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# Proposition 65 ("Prop 65") Policy and Declaration of Compliance

#### 1. Purpose

This declaration outlines Logitech's approach to compliance with California's Safe Drinking Water and Toxic Enforcement Act of 1986 ("Proposition 65"), ensuring that our products meet regulatory requirements and that customers have access to clear and accurate information regarding potential exposure to listed substances.

Our objectives can be summarized as follows.

- Ensure compliance with Proposition 65 regulations and disclosure requirements.
- Protect consumer health by assessing and mitigating exposure risks.
- Engage suppliers to verify substance use, testing, and compliance.
- Apply precautionary labeling to inform customers of potential risks.

# 2. Scope

This declaration applies to all Logitech products that are sold, distributed, or otherwise made available in California, where Proposition 65 regulations require companies to disclose the presence of certain substances known to cause cancer or reproductive harm.

# 3. Our Approach

As part of our established Hazardous Substances Management System (HSMS), we:

- Monitor Proposition 65 developments, including annual updates to the Prop 65 List.
- Review the list regularly and survey suppliers to obtain assurances and information on substance use.

When a Prop 65-listed substance is identified as potentially present in Logitech products, our internal team conducts substance characterization to:

- Understand toxicity risks.
- Assess any prescribed restrictions under RoHS, REACH, and Prop 65 (e.g., Safe Harbor Levels: NSRLs, MADLs, NOELs, SUDs, and Reformulation Thresholds).

We evaluate both:

• Magnitude of exposure (likely substance concentration).

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• Frequency of exposure (e.g., potential for prolonged skin contact).

We seek guidance from industry bodies and, where appropriate, commission third-party lab verification testing. Any restriction thresholds are incorporated into our General Specification for the Environment (GSE) Standard, which is enforced contractually across all products and manufacturing.

#### 4. Our Commitment

With this approach, we commit to ensuring:

- No significant risk to human health or customer safety.
- Application of the precautionary principle, with relevant Prop 65 labeling as a precautionary measure to ensure customer awareness.

#### 5. Our Requirements

To support compliance with Proposition 65, Logitech requires all suppliers to:

- Declare any use of substances listed under Proposition 65, including disclosure of material composition and potential exposure risks.
- Provide substance testing data and regulatory compliance certificates as requested.
- Comply with Logitech's General Specification for the Environment (GSE) Standard, which sets forth substance restrictions and reporting requirements.
- Respond to supplier surveys regarding hazardous substances and participate in due diligence processes.
- Ensure full material traceability and notify Logitech promptly of any changes that may impact compliance.

Failure to meet these requirements may result in corrective actions or removal from Logitech's approved supplier network.

## 6. Compliance Assurance

Logitech ensures compliance with Proposition 65 through a combination of:

- Supplier engagement requiring suppliers to provide substance declarations and test data.
- Risk assessment conducting internal evaluations of product materials and potential exposure risks.
- Independent testing engaging third-party laboratories for verification when necessary.
- Labeling and disclosure applying Prop 65 warnings as a precautionary measure when required, to ensure compliance with California law.



Our compliance assurance processes are reviewed regularly to align with regulatory updates and industry best practices.

## 7. Review and Update

This policy is reviewed and updated as necessary to reflect regulatory changes and industry best practices. Logitech remains committed to working with suppliers, industry groups, and regulatory bodies to ensure compliance with all applicable chemical regulations.

## 8. Further Information

For further information or compliance inquiries, please contact <u>sustainability@logitech.com</u>.

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