

Lenovo Anti-Slavery and Human Trafficking Statement

May 2026

This statement confirms the steps Lenovo has taken during Fiscal Year (FY) 2025/26 to meet the requirements of **Section 3 of the California Transparency in Supply Chains Act of 2010, the United Kingdom (UK) Modern Slavery Act (MSA) 2015, Chapter 30, Part 6, Provision 54, the Australia Modern Slavery Act 2018 and the Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act.** This statement is prepared in accordance with the UN Guiding Principles on Business and Human Rights. In this document, Lenovo confirms the steps taken to identify, prevent, mitigate and account for the risk of slavery and human trafficking in its business and its supply chain and actions that may be taken to remediate any known adverse impacts. This statement covers the activities of Lenovo and Motorola Mobility. Lenovo refers to Lenovo Group Limited together with its subsidiaries. Lenovo Group Limited is the ultimate holding company of Lenovo.

For the purposes of Part 2 of the Australian Modern Slavery Act 2018, this Statement is made on behalf of Lenovo (Australia & New Zealand) Pty Limited (ABN 70 112 394 411), Lenovo Global Technology (Australia & New Zealand) Pty Limited (ABN 90 614 012 985), Motorola Mobility Australia Pty Limited (ABN 86 139 208 361) and Lenovo Global Financial Services (Australia & New Zealand) Pty Limited (ABN 85 662 629 638).

For the purposes of Chapter 30, Part 6, Provision 54 of the U.K. Modern Slavery Act 2015, this statement is made on behalf of Lenovo Global Technology UK Limited (10219781), Lenovo Technology (United Kingdom) Limited (04912819), Motorola Mobility UK Ltd. (06969556), TTPCom Limited (03475732), TTP Communications Limited (03962172), Motorola Mobility Holdings UK Limited (10696969), Lenovo Global Financial Services (UK) Limited (16362001) and Channel Solutions and Services Ltd. (11786337).

For the purposes of Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act S.C. 2023, c. 9 this statement is made on behalf of Lenovo (Canada) Inc. (634230-2), Lenovo Global Technology (Canada) Inc. (983256-4), Motorola Mobility Canada Ltd. (755836-8), Lenovo GFS (Canada) Inc. (1708938-4) and approved pursuant to section 11, paragraph (4)(b)(ii), by a director of Lenovo Group Limited.

In the process of developing this statement we consulted all the relevant companies we own or control listed above.

Organization and Structure

Lenovo is a global technology company incorporated and listed in Hong Kong SAR, China, with headquarters in Beijing, China, and North Carolina, USA with approximately 73,500 employees worldwide, serving millions of customers every day in 180 markets.

Lenovo's business is organized into segments by business group, including the Intelligent Devices Group ("IDG"), the Infrastructure Solutions Group ("ISG") and the Solutions and Services Group ("SSG").

Lenovo's business groups are supported by corporate level functions, including global supply chain and environmental, social, and governance (ESG) teams. Further information about Lenovo, its management, investor relations, and corporate ESG commitments can be found at <https://www.lenovo.com>.

Corporate Policies

Lenovo is committed to ethical corporate citizenship and promoting strong ESG performance in its activities. Lenovo demonstrates these commitments through transparent and responsible actions driven by its values. These values respect and are informed by those of its stakeholders, including the communities with which we interact. Lenovo expects all its employees, as well as contractors and consultants who perform work on Lenovo's behalf, to report immediately any suspected violations of laws, regulations, the Lenovo Code of Conduct, or Lenovo policies. Lenovo strives to attain the highest level of ethical integrity and to this end conducts worldwide internal audits that independently validate controls and investigate abuses. Its activities are guided by the corporate policies and programs noted below.

Code of Conduct

Lenovo's [Code of Conduct](#) establishes clear expectations for ethical behavior requiring employee, as well as contractors and consultants, to uphold the highest standards of integrity in all business activities. It emphasizes the importance of (including but not limited to) reporting unlawful or inappropriate conduct, protecting intellectual property and confidential information, and fostering a workplace grounded in dignity, respect, and inclusion.

Focus on Employee Welfare

Providing a safe and healthy working environment is core to Lenovo's operating principles. Lenovo equips employees with products and equipment that are safe for use. Lenovo also focuses on implementing and improving processes and controls for preventing work-related accidents, injuries and illnesses. Lenovo's Corporate Policy #3 [Occupational Health and Safety Policy](#) focuses on creating and maintaining a workplace that provides for the health and safety of all employees and reinforces the importance it places on this at locations where Lenovo does business. Lenovo's Corporate Policy #17 [Workplace Violence](#) emphasizes that all employees, contractors, and guests are expected to refrain from violence, harassment, intimidation, or coercion.

Commitment to Diversity and Non-Discrimination

Lenovo's [Code of Conduct](#) along with Corporate Policy #2 [Commitment to Diversity and Nondiscrimination](#) provide for a work environment free of discrimination and harassment based on race, color, gender, religion, age, nationality, social or ethnic origin, sexual

orientation, gender identity or expression, marital status, pregnancy, disability or veteran status.

Sustainability Policy

Lenovo's [Sustainability Policy](#) states its commitment to ethical corporate citizenship and promoting ESG topics in all of its activities. Every organization must support this policy, and each manager, employee and any contractor performing work on behalf of Lenovo bears a personal responsibility to abide by the following principles:

- Provide a safe, healthy, and enriching working environment for its employees
- Be a fair and responsible member of the communities in which Lenovo operates
- Work with its supply chain to ensure that Lenovo's values and expectations are upheld
- Extend the benefits of Lenovo experience, products, and successes to the communities in which Lenovo operates and contributes to their development
- As employees and as a company, be ethical and responsible citizens

Human Rights Policy

Lenovo's Corporate Policy #22 [Human Rights](#) affirms the company's support for universal human rights, including those identified in the United Nations Declaration on Human Rights, and commits to extending these rights to its employees and others directly or indirectly employed in its supply chain. This policy applies to Lenovo's worldwide operations and those of its supply chain. Every Lenovo organization must support this policy including the following commitments:

- Conduct business in accordance with the United Nations Declaration of Human Rights and the principles of the United Nations Global Compact, and extend those requirements to all suppliers doing business with Lenovo
- Operate in compliance with relevant laws, regulations, and ethical standards in each jurisdiction where Lenovo conducts business
- Perform due diligence across the value chain to identify risks and avoid complicity in human rights violations
- Provide access to grievance mechanisms, investigate allegations, and escalate known cases of human rights abuse to senior leadership
- Integrate training and accountability for respecting human rights across the business and the supply chain
- Engage internal and external stakeholders to address common challenges and advance human rights practices through continuous improvement

All corporate strategies, practices, and guidelines, as well as supplier requirements, must support Lenovo's commitment to human rights. Any concerns about possible human rights violations must be reported to Lenovo management, who shall take prompt corrective action.

Supplier Code of Conduct

Lenovo expects its suppliers to meet the highest standards of responsible sourcing. Lenovo's standard contractual terms and conditions for production suppliers require compliance with Lenovo's [Supplier Code of Conduct](#). Conformance to Lenovo's Supplier Code of Conduct is assessed as part of the procurement evaluation and decision-making process. Lenovo is committed to upholding the highest standards of ethical

business conduct, including protecting the rights and well-being of all workers, including vulnerable workers. Vulnerable workers often face unique challenges, including barriers to legal protection, risks of exploitation, and difficulties in accessing fair wages and working conditions. At Lenovo, every worker in our operations and supply chain is treated with dignity, fairness, and respect. The key elements of the Lenovo Supplier Code of Conduct are as follows:

- Procurement Values and Ethical Dealings
- Conflicts of Interest and Business Integrity
- Supply Chain Security
- Human Rights
- Responsible Business Alliance
- Employment Agencies
- Climate Change
- Environmental Aspects
- Responsible Sourcing of Raw Materials
- Non-Discrimination and Non-Retaliation
- Supplier Inclusion
- Sustainability Reports, Assessments and Product Certifications
- Accessibility and Inclusive Design
- Supply Chain Due Diligence
- Raising Concerns

Partner Code of Conduct

At Lenovo, maintaining the highest ethical standards is fundamental to our business and to the trust we build with our customers, partners, and communities worldwide. This commitment to integrity extends beyond our own practices to include the conduct of our business partners. To support this goal, we have introduced the [Lenovo Partner Code of Conduct](#).

Lenovo's Partner Code of Conduct outlines the expectations and responsibilities of our business partners – ensuring alignment with our Lenovo's values on ethics, sustainability, and compliance. By adhering to these guidelines, Lenovo Partners help us maintain Lenovo's reputation for responsible and lawful conduct, supporting our dedication to integrity and accountability.

International Standards and Certifications

Lenovo supports the work of many independent, non-governmental international organizations which bring together experts to share knowledge and develop voluntary, consensus-based, market relevant international standards that support innovation and provide solutions to global challenges.

Lenovo maintains third-party certification for its internal manufacturing operations to the following standards and encourages its production suppliers to maintain certifications to these standards.

- [ISO 9001 Certification for Quality Management Systems](#)
- [ISO 14001 Certification for Environmental Management Systems](#)
- [ISO 45001 Certification for Occupational Health & Safety](#)

Responsible Business Alliance (RBA)

Lenovo believes in the benefits of having an industry standard supply chain code of conduct and therefore implements the [RBA Code of Conduct](#) internally within Lenovo global manufacturing locations and externally across its supply chain. Lenovo has been a member of RBA since 2006 and by engaging in RBA initiatives, including the Responsible Labor Initiative and the Forced Labor Due Diligence Working Group supports RBA's efforts to ensure that working conditions in the electronics industry supply chain are safe, workers are treated with respect and dignity, and that business operations are environmentally responsible, conflict free and are conducted ethically.

Identification of Risk

Lenovo's procurement activities include both direct (supporting product production) and indirect (serving internal operations) procurement. With regards to Lenovo's risk for human trafficking and slavery, the risk is largely in the external supply chain for direct procurement. This risk exists because many suppliers have access to large, lower-skilled labor pools that are vulnerable to exploitation. The risk also exists in other tiers of the supply chain, from component manufacturers, smelters, and refiners to the miners of raw materials.

Lenovo's indirect procurement activities serve its internal operations and have a smaller risk in that they represent a small fraction of its overall procurement spend, involve suppliers with higher skilled employees, and have significantly fewer supporting tiers.

With respect to Lenovo internal manufacturing locations, it has direct control over the management and labor force of these operations and believes there is a low risk for human trafficking and slavery abuses. Lenovo's line management conducts self-audits, and Lenovo Corporate Internal Audit conducts independent audits. Additionally, its manufacturing sites receive RBA independent third-party audits with RBA-approved auditors and are very visible to Lenovo's global management team.

Responsible Sourcing of Materials

Responsible sourcing is embedded into Lenovo's supply chain management business processes and is conducted in accordance with Lenovo's Policy on [Responsible Sourcing of Raw Materials](#) and [Lenovo's Cobalt Policy and Statement](#). Its Supplier ESG Scorecard includes metrics on suppliers' adherence to its Conflict Minerals expectations. This scorecard is used by Lenovo in business reviews with suppliers and provides a key input into business decisions.

Lenovo actively participates in Responsible Minerals Initiative's ([RMI](#)) programs. RMI's tools and guidance documents such as Responsible Minerals Assurance Process ([RMAP](#)) results help Lenovo address responsible sourcing risks for minerals. Lenovo supports China smelters engagement through the China SET (Smelter Engagement Team) within the RMI and by serving as the SPOC (Single Point of Contact) for both 3TG and Cobalt smelters or refiners in Asia. Lenovo continues to drive its suppliers to discontinue the use of non-conformant smelters.

Supply Chain Due Diligence

Lenovo directly validates supplier compliance with the RBA Code of Conduct. This includes formal annual supplier Self-Assessments and biennial supplier audits of compliance to the RBA Code of Conduct with independent RBA approved third party auditors and reporting with RBA tools. Auditors review the evidence gathered during the

assessment and evaluate the compliance status for each question of the assessment. The auditors prepare and provide the Validated Assessment Report, a formal document describing the assessment findings. The communicated findings identify both good practices and deficiencies related to the policies, practices, and conditions for the sections of the RBA Code of Conduct and it is the basis for the Corrective Action Plan (CAP). A non-conformance finding in the labor section of the RBA Code of Conduct does not necessarily indicate the occurrence of forced or child labor; rather, it may reflect gaps or deficiencies in the policies, procedures, or controls intended to prevent such practices. For audit findings, the manufacturing site is requested to offer a CAP within 60 days or an appropriate period. Strong and verifiable evidence must be provided to confirm that the identified issues have been effectively resolved. Lenovo tracks the progress and verifies the evidence provided to confirm that the issues were remediated. To verify the effectiveness of corrective measures taken to correct non-conformance findings in initial audit, closure audit may be required.

Continuous Monitoring: Supplier RBA Spot Check

Starting in FY 2025/26, Lenovo implemented the Supplier RBA Spot Check process for selected suppliers to further strengthen field-level oversight. These semi-announced checks are conducted in accordance with RBA standards, covering aspects including labor, health and safety, environment, ethics and management system. The process incorporates onsite observation, documents review and worker interviews, allowing for the direct verification of onsite practices. This initiative helps verify and enhance suppliers' alignment with the Lenovo Supplier Code of Conduct. For identified gaps, Lenovo mandates CAPs with defined timelines and monitors closure progress.

Reporting Possible Human Rights Violations

Concerns about possible human rights violations must be reported to Lenovo management and can also be reported through Lenovo's various reporting channels, including, but not limited to, the Ethics and Compliance Office, Human Resources, Internal Audit, the Legal Department, or the [LenovoLine](#) (Lenovo's confidential reporting hotline). Lenovo takes all allegations and concerns seriously. Lenovo's [Whistleblowing and Investigations Policy](#) outlines the process by which concerns can be raised, are reviewed and are investigated. Lenovo's oversight body, the Investigation Oversight Committee (IOC), provides oversight to ensure concerns raised are appropriately investigated and addressed.

Additional Actions

To further enhance our programs in this area, Lenovo took the following additional actions:

- Publicly disclosing and keeping up to date the comprehensive list of [Lenovo Manufacturing Sites and Suppliers](#)
- Continued efforts to encourage more suppliers to achieve RBA Silver, Gold, Platinum, or Factory of Choice status
- Continued efforts to achieve 0 RBA Priority non-conformance findings per RBA audit
- Continued efforts to achieve less than 4 Major non-conformance findings per RBA audit
- Real-time reporting of working hours and days off for many suppliers
- Implemented EcoVadis assessment tools to assess suppliers

Prevention and Mitigation of Risk

Lenovo implements multiple measures designed to minimize the risk of slavery and human trafficking and drive social responsibility within its business and its supply chain.

Responsible Partners

Lenovo generally does business with large international and national suppliers who have their own corporate ESG programs. Specifically:

- 74% of its procurement spend is with formal RBA Members
- 95% of its procurement spend is with companies who also issue public Corporate ESG Reports
- 99% of its procurement spend is with ISO 9001 certified companies
- 99% of its procurement spend is with ISO 14001 certified companies
- 98% of its procurement spend is with ISO 45001 certified companies

RBA Code of Conduct Implementation and Verification

Lenovo requires its suppliers to comply with its Supplier Code of Conduct, in which they are required to comply with the latest version of the RBA Code of Conduct to ensure that supplier working conditions are socially, environmentally, and ethically responsible. The labor section of the RBA Code of Conduct specifically addresses forced labor, child labor and human trafficking concerns.

RBA membership requirements call for an annual risk assessment on at least 80% of Tier 1 direct manufacturing suppliers by spend and annual audits on 50% of those identified as elevated risk. Lenovo's implementation exceeds this requirement. Lenovo directly validates compliance for approximately 95% of its procurement spend with self-assessments and audits, which includes many critical Tier 2 and Tier 3 suppliers who are also Tier 1 suppliers. Lenovo requires these suppliers to:

- Conduct a risk assessment using the RBA Self-Assessment Questionnaire (SAQ) annually and report the results in the RBA online tool
- Perform assessments at least at a supplier key site level
- Conduct biennial, independent, third-party RBA audits with RBA-approved auditors
- Document audit reports and corrective action plans
- Confirm closure of action plans
- Require upstream suppliers to comply with the RBA Code of Conduct

This validation and audit results reporting process forms the basis for Lenovo's evaluation of the effectiveness of its programs.

Supplier Penalties & Credits

Supplier ESG performance is included in Lenovo's quarterly supplier report cards. Suppliers are evaluated based on key indicators across RBA, environmental impact, responsible sourcing of raw materials, sustainability reporting, EcoVadis status, and other ESG factors. Leveraging an advanced ESG digital platform, Lenovo has increased the visibility of ESG performance. Suppliers representing 99 percent of production procurement spending have been monitored. Supplier ESG performance is used as an overall multiplier against the aggregate cost, quality, delivery, technology, and service scores and can significantly influence a supplier's overall rating.

Supplier Relationship Management

Lenovo also has a Lenovo Supplier Advisory Council (LSAC) where senior executives from Lenovo and approximately 49 critical suppliers (constituting about 73% of its procurement spend) meet semi-annually.

Accounting for Risk

To verify whether adverse human rights impacts are being prevented, or resolved if they occur, Lenovo is tracking the effectiveness of its programs and reports on them internally and externally. Key reporting on the supply chain includes the following examples:

Internal Reporting & Metrics

ESG performance is measured and reported to senior procurement management as follows:

- RBA Monthly Reporting:
 - Number of suppliers in the validation program
 - Percent on-time self-assessments, numbers of late self-assessments and those due within 3 months
 - Percent on-time audits, number of late audits and number due within 6 months
 - Number of late corrective action reports
 - Number of open action items, number of Priority findings, and number of supplier responsibility findings
 - Number of suppliers with late working hours / time off quarterly validation reports
 - Full supporting detail on each issue and individual supplier status
 - Working hours and time off are also reported by outsourced manufacturing suppliers via an online tool
 - Newsletter of current and upcoming events, programs, and issues
- RBA Quarterly Reporting
 - Overall year to date audit scores and yearly trends
 - By segment year-to-date audit scores (labor, environmental, occupational health and safety (OH&S), ethics, and management systems)
 - Number of Priority findings and Major findings for each cause
 - Full supporting detail of each audit finding

External Reporting

Further details on Lenovo's sustainability efforts and performance are available publicly within Lenovo's [ESG Report](#) along with other information on its [ESG Resources](#) webpage.

Training and Capability Building

Lenovo maintains ongoing online learning resources for employees on forced labor, modern slavery, human rights protection, and employment legislation, delivered through its global learning management system.

For Global Supply Chain employees and suppliers, Lenovo conducts several education and communication activities throughout the year which may include:

- Monthly newsletters

- Annual ESG training
- Annual training on Supplier Report Card penalties and credits
- Annual training on Supplier Code of Conduct
- Annual Environmental Impact training
- Annual Responsible Sourcing of Raw Materials training

External Capability Training

As noted above, a substantial portion of Lenovo's suppliers are large international and national suppliers with existing and substantial ESG programs, so the need for capability building is lessening. Furthermore, the RBA has a readily available comprehensive Learning Academy with modules on all their programs, guidance and tools. In addition to this Lenovo provides:

- Webinars for suppliers and ad-hoc education as necessary
- Semi-annual communications letters on the RBA, environmental impact, conflict minerals, Lenovo Supplier Code of Conduct expectations and program efforts
- Online learning module offering a comprehensive suite of ESG training courses

In FY 2025/26, Lenovo delivered trainings covering global ESG trends, forced labor prevention and emerging topics such as living wages and worker engagement to over 470 global sourcing managers.

In July 2025, Lenovo provided a Comprehensive Employment Training program for individuals involved in human resources and procurement activities at Lenovo's China-based manufacturing sites as well as labor agency representatives. The training covered all labor-related chapters of the RBA Code of Conduct with a focus on preventing forced and child labor, non-discrimination in recruitment, and ensuring compliance with working hours and wage requirements. Approximately 50 participants attended the in-person training session, while the same content was also delivered through a supplier webinar, reaching a broader audience of over 960 participants.

Effectiveness

Lenovo has been a member of RBA since 2006 and is an active member of several RBA workgroups. In support of this program, all Lenovo owned facilities as well as 95% of our suppliers by spend are required to undergo biennial RBA assessments. Assessments carried out on RBA member facilities and their suppliers' facilities are completed by independent RBA approved third-party auditors specially trained in social and environmental assessment and the Validated Assessment Program (VAP) protocol. A typical VAP onsite assessment at a single manufacturing facility may last 2-5 days and includes a thorough document review, interviews with management and employees and a visual site survey. RBA-approved auditors use local, native-speaking assessors where possible, and they are specially trained to spot hard-to-find VAP protocol violations like instances of forced labor. Assessments also include a review of mechanisms, controls, and processes in place to prevent child labor and forced labor at each site that is assessed. The auditors also review employee files, including working hours, overtime hours and sufficient time off and conduct individual and group interviews. In 2024 RBA introduced version 8.0 of their Code of Conduct. Lenovo has continued with adopting these standards and requires our suppliers to comply with the latest version of the RBA Code of Conduct.

During assessments conducted by independent auditors in accordance with the RBA Code of Conduct, no instances of forced labor or child labor, as defined by the

International Labour Organization (ILO), were identified at any Lenovo production facility or at the audited supplier facilities. Therefore, no remedial actions were necessary, including an assessment to determine if vulnerable families have experienced a loss of income, and other measures as described in this statement.

As of FY 2025/26, Lenovo owned facilities' average score for RBA VAP audits was 176 versus the industry average of 149. Additionally, one audited Lenovo facility was awarded platinum status and eight facilities were awarded silver status. All Lenovo owned facilities achieved Factory of Choice status.

Remediation of Adverse Impacts

In the event of supplier non-conformance to ESG requirements, several actions may take place, including:

- Immediate discontinuation of business for serious violations
- Track all audit findings to closure and require supporting evidence whenever possible
- Penalize the supplier in the quarterly supplier report card score with the ESG multiplier
- Senior Procurement management engagement with the supplier
- Executive Lenovo management engagement with the supplier

Ultimately poor ESG performance results in lower business volume and eventual discontinuation of business. It is Lenovo's experience that good ESG performance often comes together with good cost, quality, delivery and other performance attainment measures and therefore is a good business performance indicator. Suppliers with strong ESG performance coupled with robust performance overall may be rewarded with increased business volume and continuation of the business relationship.

Management approval and attestation

This disclosure summarizes the efforts Lenovo has taken in its own business, as well as its suppliers, to eradicate slavery, human trafficking, forced labor and child labor from its supply chain and promote human rights and employee welfare globally. This document has been reviewed and approved by its Board of Directors and will be published externally.

On behalf of the Board
Lenovo Group Limited



YANG Yuanqing
Director

Date: May 28, 2026