

November 2018



Lenovo's Policy on Minerals from Conflict-Affected and High-Risk Areas

Lenovo is committed to protecting the environment and the communities in which we operate. Lenovo expects our supply chain to procure minerals responsibly and to avoid sources that would directly or indirectly fund conflict. This includes conflict minerals from the Democratic Republic of the Congo and other high-risk areas worldwide. Lenovo has implemented the following policies and actions to mitigate risks in this area.

- Conduct due diligence to ensure responsible sourcing in all geographies and high-risk areas, report those efforts publicly and require our suppliers to do the same.
- Utilize the OECD Due Diligence Guidance for Responsible Supply Chains from Conflict-Affected and High-Risk Areas and encourage its use by our suppliers and others with whom we interact.
- Approve efforts of all key stakeholders, governmental bodies, industry groups and other concerned organizations (e.g., LBMA, RJC, ITRI, PPA, IPC, Enough, Resolve, Solutions for Hope, etc.) to promote peaceful, diverse and stable economies.
- Encourage a responsible and sustainable minerals trade without boycotting the DRC or adjoining countries.
- Continue investment, membership in and support of the Responsible Business Alliance (RBA) since 2006.
- Participate in the RBA Responsible Minerals Initiative (RMI) programs.
- Use the RBA Conflict Minerals Reporting Template (CMRT) and the Responsible Minerals Assurance Process (RMAP) to source from smelters validated by industry-accepted protocols only.
- Conduct outreach directly to Smelters or Refiners of conflict minerals.

In addition, Lenovo contractually requires its suppliers to:

- Comply with all environmental laws and material content restrictions.
- Implement the RBA Code of Conduct, conduct Audits with independent RBA approved 3rd party auditors and report Corrective Actions to ensure compliance for responsible sourcing of minerals.
- Require their upstream suppliers to comply with the RBA Code of Conduct.
- Have a policy to not directly or indirectly finance perpetrators of human rights abuses.
- Exercise due diligence on the source and custody of conflict minerals and to make their efforts available upon request.

Lenovo meets all legal requirements related to conflict minerals sourcing and disclosure requirements wherever our products are sold worldwide. We are committed to sourcing only conflict-free minerals and using minerals only from smelters that have been audited and verified by RMAP or equivalent programs. Lenovo expects itself and its suppliers to be conflict-free. For any unethical, unlawful or inappropriate behavior relating to conflict minerals in Lenovo's supply chain or any other sustainability concern, please contact environment@lenovo.com.

Sincerely,

A handwritten signature in black ink that reads "David B. Martin".

Global Supply Chain Sustainability Manager