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### 1.0 Company Overview

Lenovo is a global technology powerhouse, ranked at 217 in the Fortune Global 500, and a \$62 billion revenue company that employs 77,000 people worldwide focused on delivering “smarter technology for all”. Building on our success as the world’s number one PC maker, Lenovo is expanding its research into growth areas to advance “New IT” technologies (client, edge, cloud, network, and intelligence). Lenovo is determined to improve our planet and society by minimizing Lenovo’s environmental impact, promoting social equity through its business and via the Lenovo Foundation, and ensuring ethical, responsible, and transparent operations. Lenovo is devoted to conduct socially, environmentally, and ethically responsible sourcing and business practices with our products, employees, sites, and suppliers. To find out more visit [About the Company | Lenovo US](#) to read about the latest news via our [StoryHub](#).

### 2.0 Definition / Glossary

#### Definition

“Conflict minerals” are defined as raw mineral sources of tin, tantalum, tungsten and gold, which are the extracts of the minerals cassiterite, columbite-tantalite and wolframite, respectively. They are frequently referred to as “3TG”.

#### Glossary

- 3TG – Tin, tantalum, tungsten & gold
- CMRT – RMI’s [Conflict Minerals Reporting Template](#)
- Covered Countries – the Democratic Republic of the Congo and the adjoining countries
- Conflict-free – A status for which all associated conflict minerals are sourced through smelters or refiners validated by recognized responsible sourcing protocols such as RMI’s RMAP and its cross-recognized programs (e.g., RJC and LBMA) as not financing armed conflict
- DD – Due Diligence

- DRC – Democratic Republic of the Congo
- EMRT – RMI’s [Extended Minerals Reporting Template](#)
- Form SD – The U.S. Securities and Exchange Commission’s Specialized Disclosure Form
- LBMA – [London Bullion Market Association](#)
- Non-Conformant – RMI status for a smelter or refiner facility that was audited but found to be not conformant with the relevant RMAP standard
- OECD – Organization for Economic Cooperation and Development
- OECD Guidance – OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition
- RBA – [Responsible Business Alliance](#)
- RCOI – Responsible Country of Origin Inquiry
- SET – Smelter Engagement Team
- RJC – [Responsible Jewellery Council](#)
- RMAP – RMI’s [Responsible Minerals Assurance Process](#)
- RMI – [Responsible Minerals Initiative](#)
- SOR – Smelter or refiner
- SPOC – Single Point of Contact
- RSRM – Responsible Sourcing of Raw Materials
- Rule 13p-1 – Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1)
- TI-CMC – [Tungsten Industry – Conflict Minerals Council](#)

### 3.0 Program Overview

This Conflict Minerals Report of Lenovo Group Limited (Lenovo) for the calendar year 2023 is in compliance with Rule 13p-1 under the Securities Exchange Act of 1934 and Form SD. This ruling is also known as Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

Lenovo’s due diligence process is designed to align with the OECD Guidance and initiatives developed by the RBA RMI. We conduct our responsible supply chain sourcing efforts for RCOI and DD to determine if Conflict Minerals necessary to the functionality or production of products we manufactured or contracted to manufacture originated in the Covered Countries or were from recycled or scrap sources. Our Specialized Disclosure Report was signed by our Executive Director Global ESG & Regulatory Compliance.

We focused our efforts on identification, audits, and certification of SOR’s to be conflict-free by relying on independent third-party auditing programs to coordinate audits of SORs in our products supply chain:

- RMAP: Helps conduct DD and to establish business processes and protocols for SOR auditing and certification. Additionally, this program provides country of origin information identified from actual audits.

- SET Workgroup: Verifies SORs as legitimate, to conduct outreach to drive them for certification and to track the status of all auditees.
- 3TG Industry Program Alliances: Leverages other industry organization efforts on responsible sourcing which provide additional RCOI and DD information. The organizations include the LBMA, RJC, and TI-CMC.

#### **4.0 Reasonable Country of Origin Inquiry (RCOI)**

It is a common industry practice for companies in the electronics industry to utilize conflict minerals for the necessary functionality or production. As such, conflict minerals are in all our hardware products and a listing of specific products would be redundant.

Lenovo conducted a RCOI to determine if conflict minerals did originate in the Covered Countries. To conduct the RCOI, we required our suppliers to provide the CMRT & EMRT that cover all products their companies supplied or will supply to Lenovo during 2023, regardless it is company level or product level reports. The goal was to determine whether any 3TG and extended minerals (e.g., Cobalt) in our products or components originated in the Covered Countries.

In Lenovo's 2023 survey cycle, we surveyed on over 95% of our suppliers by procurement spending and achieved a 100% response rate. Responses were checked for completeness, consistency, and compliance status. We compared their responses with the RCOI data provided by the RMAP. Suppliers' conflict mineral policies were directly validated. Incomplete reports or those with non-compliance findings were returned for corrective action (e.g., policy link invalid, contained non-compliant SORs). Reported countries of origin are identified in Section 10.1 of this report.

Based on the results of RCOI and good faith efforts, Lenovo did have reason to believe that certain conflict minerals contained in our 2023 products may have originated in the Covered Countries and may not have been from recycled or scrap sources. Therefore, we conducted DD on the source and custody of conflict minerals in our products and created this Conflict Minerals Report with the required elements. Furthermore, based on DD described further in this report, we did not learn of any facts that led us to conclude that any of our products contain Conflict Minerals directly or indirectly finance or benefit armed groups in the Covered Countries.

#### **5.0 OECD Due Diligence Measures Taken**

Lenovo adopts the OECD Guidance to conduct our RSRM DD efforts. Following are the measures taken by Lenovo to comply with OECD Guidance, Dodd-Frank and the RBA to prevent the use of raw materials that may contribute to conflict.

##### **5.1 Establish Strong Management Systems**

- Lenovo has released a formal [Policy on Responsible Sourcing of Raw Materials](#) and a separated [Cobalt Policy and Statement](#), publicly states on the standard regarding responsible sourcing of conflict minerals and cobalt. Both policies can be found at: [Lenovo Sustainability Resources | Lenovo US](#).

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- Lenovo has a formal organization structure for ESG and RSRM management. Our Executive Director Global ESG & Regulatory Compliance, Global Supply Chain Sustainability Director, Global Supply Chain Strategy and Thinktank ESG team are dedicated to all RSRM initiatives. They work closely with other teams along the supply chain including Procurement Team, to collect data from suppliers and work with them for non-compliance corrective actions.
- We established a system of transparency and control over the supply chain that allows the identification of SORs. First, we execute the RBA RMI programs for RCOI to identify the SORs. Second, we survey on our supply chain annually using the CMRT & EMRT, which is the primary mechanism for identifying SORs that supply minerals to components and for assessing the risks associated. We maintain all records on a computerized database. Third, following the collection of SORs' data from suppliers, Lenovo utilizes the RMI's RMAP to gain initial insights into whether the SOR is compliant to the audit standards.
- We have taken several measures to establish and enhance our supplier engagement.
  - ✓ We have long-term relationships with most of our suppliers to build leverage and compliance. Much of our procurement spending is with a small supplier base and as such transitions are costly.
  - ✓ We established our expectations via formal communications including Lenovo responsible sourcing policies and semi-annual communication letters to suppliers. We also have a [Supplier Code of Conduct](#) which is included in Lenovo Agreements and Purchase Orders, helps to further incorporate our ESG requirements.
  - ✓ We directly validate supplier compliance with the [RBA Code of Conduct](#), which includes conflict minerals DD efforts. This included formal annual supplier Self-Assessments and biennial Supplier Audits of the code with RBA approved third party auditors and reporting with RBA on-line tools.
  - ✓ RSRM is embedded into Lenovo supply chain management business processes. Our Master Supplier ESG Scorecard includes metrics on suppliers' adherence to our RSRM expectations. This scorecard is used by Lenovo Procurement team in business reviews with suppliers and provides a key input into business decisions.
- Lenovo has several mechanisms for company or industry grievances. Internally we have corporate policies including [Environmental Affairs](#), [Whistleblowing and Investigations Policy](#) as well as a formal [Employee Code of Conduct](#) covering specific areas of focus and where to go for help. Externally we have a [Human Rights Policy](#). For industry or external grievance, we also have a contact identified in our [Supplier Code of Conduct](#) and asked concerned parties to contact the Ethics and Compliance Office at [ethics@lenovo.com](mailto:ethics@lenovo.com), LenovoLine at <https://lenovo.whispli.com/speakup> and <https://lenovo.whispli.com.cn/speakup> (for China based individuals).

## **5.2 Identify & Assess Risk**

Since there are many complex risks in ensuring a conflict-free supply chain, the OECD Guidance recognizes the difficulty for downstream companies to identify upstream actors. Lenovo's goal is to

identify the SOR in our supply chain using standard industry wide schemes as to whether the conflict minerals came from the Covered Countries.

The key resulting risks were identified as:

- Were the SOR's located in the DRC or the surrounding countries?
- Had the SOR procured ore from Covered Countries?
- Was any information provided by SOR's and multiple tiers of the supply chain sufficiently precise?
- Would basic engagement with SORs (e.g., email, telephone, internet investigation, site visits) be sufficient to provide adequate confidence of not contributing to conflict?
- Given the worldwide nature of supply chains, could the risk be presented with most SOR's matter where they are located?
- Even though a SOR was reported in our supply chain, were we certain the mineral content was actually in our products?

Through our DD efforts, we ceaselessly contacted and reminded non-responsive suppliers but also reviewed supplier responses for completeness and accuracy. For supplier' responses containing errors, inconsistencies, or incomplete information, we immediately provided feedback and requested for corrective action.

### **5.3 Design and Implement Response Strategy**

Lenovo's strategic objective to sufficiently respond to and mitigate the risk is to firstly identify all the SOR's in our supply chain, whether they are involved in our supply chain and either get them conformant or to ultimately discontinue usage of them. Lenovo's strategy to respond to the risks was as follows:

- **SOR Certification**

Lenovo actively participates in the RMI's programs. We rely on resources such as RMAP so that only compliant (conformant + active) smelters are used. We also keep investing personnel resource driving direct engagement by joining China SET in RMI and SPOC for both 3TG and Cobalt SOR in Asia, by engaging with SORs to undergo RMAP audits.

- **SOR Discontinuation**

- ✓ Since hundreds of companies and RBA/RMI members share the same SOR database, our strategy is to use the collective power to drive positive changes. In the event our outreach is not successful, Lenovo participates in joint efforts to discontinue the use of SORs which refuse to be audited and certified, and require our suppliers to do the same.
- ✓ It is important to note that there are distinct challenges to actually verify removals of SOR from supply chains. Demanding suppliers to remove non-compliant SOR ("negative efforts") provides low confidence that a smelter is removed from a supply chain and the removal stays effectuated. Lenovo recognizes that positive efforts are better in the long run for all involved parties.

- Reporting & Awareness
  - ✓ Progress on the RSRM program status is reported internally via the RSRM Bi-Monthly Update, and to executive management on an annual basis. We also use Global Supply Chain ESG Newsletter to communicate on key ESG news, events and concerns, and provide education class on RSRM for Procurement Team via online training platform.
  - ✓ We also actively feedback on our due diligence measures to customers and external stakeholders upon request.
- OECD Due Diligence Guidance

Lenovo will continue to actively promote the observance of the OECD Guidance, take measure to integrate the 5-step framework into our management systems and to ensure the widest possible dissemination of the guidance.

#### **5.4 Carry Out Independent 3rd Party Audits**

Lenovo relies on the RMAP, LBMA, RJC, and TI-CMC to coordinate third-party audits of smelters and refiners to validate the sourcing practices of such facilities in our supply chain. Through our membership in the RMI and participation in the RMI China SET workgroup, we continue to support development and implementation of responsible mineral sourcing validation programs.

#### **5.5 Report Publicly on Due Diligence**

Lenovo publicly discloses our due diligence policies and responsible sourcing efforts. We also provide information related to social and environmental responsibility on our company website and in our annual [ESG Reports](#). This report and all of Lenovo's other sustainability efforts are available at: [Lenovo Sustainability Resources | Lenovo US](#).

### **6.0 Additional Measures to be Taken**

Lenovo will take further steps in calendar year 2024 to improve our efforts and to continue our results. We have a goal of keeping our overall conflict-free posture to 100% by end of CY2024. We will:

- Continue to work closely with suppliers to obtain the necessary information on the origin of minerals contained in the materials or components used in the Covered Products.
- Continue to directly engage SORs to undergo RMAP audits through active participation in RMI workgroups. Contribute volunteer as SPOC for 3TG and cobalt refiner in Asia, who builds relationship with eligible SORs and liaise between the RMI program and SORs.
- Further automate our consolidation of supplier CMRT and EMRT data. Developing tools to increase the accuracy and efficiency in our DD process.
- Further institutionalize Cobalt as well as other extended minerals along with 3TG.



- Develop the use of EcoVadis platform to better manage and improve suppliers' overall ESG performance.

## 7.0 Limitations on Our Due Diligence Measures

Lenovo by far is not a manufacturer or nor conducts “contract to manufacture” per the Dodd-Frank definition for significantly much of our procurement spend, and we were a final assembly / test operation and our suppliers acted more as retailers. Much of our supplier relationships are better characterized as one in which Lenovo is a “sales channel” as opposed to one in which the issuer is “outsourcing manufacturing”. Much of our key parts are industry standard componentry indistinguishable for our supplier’s other customers. Nevertheless, Lenovo conducts conflict mineral DD on its supply chain regardless of these exceptions.

The requirements of OECD Guidance recognize Lenovo’s position in the overall supply chain where we sell technology products and services to end-users and act as a “downstream” retailer. For a significant portion of the parts we purchased, Lenovo had no direct influence on the parts, ingredients, or components in them. Much were industry standard product where we only specified or negotiated contractual terms with a manufacturer that did not relate to the manufacturing of the product (e.g., only price and legal terms). We did not direct the CPU, Storage, Memory, Planar, Battery and other electronic suppliers on their parts, ingredients, and components in their products other than restriction of hazardous substances.

Since Lenovo does not purchase raw or refined ore, we do not have any direct visibility to the further upstream mines of origin, the buyers / sellers / consolidators / intermediaries, the transit routes, nor to the “mid-stream” SORs. Lenovo was in fact numerous supply chain tiers away from the mines of origin and the actual mining.

Consequently, there were specific and complex challenges in terms of data accuracy, coverage, vintage, confidentiality, scope of data, languages / communications / translations as well as lack of any direct business relationships to gain direct transparency on the supply chain. As a result, the origin of conflict minerals cannot be determined from Lenovo’s position in the supply chain, with any certainty once the raw ores are smelted, refined and converted to ingots, bullion or other conflict mineral derivatives.

## 8.0 3TG SOR Key Indicators

According to Lenovo’s 2023 RCOI and DD efforts, we have identified as best possible all the SORs in the surveyed scope. We achieved Conflict-Free within the 3TG supply chain, 100% of the identified and reported conflict minerals SORs are conformant and active. The table below indicates our overall progress trend and 2023 RSRM survey cycle performance.

### 8.1 Lenovo’s 3TG Survey Cycle Performance

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Lenovo Status	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
% Conformant	50%	75%	80%	82%	89%	97%	92%	89%	94%	97%

Conflict Mineral	Total SOR	Conformant	Active	Non-Compliant	% Conformant
Ta – Tantalum	36	35	1	0	97%
S – Tin	70	67	3	0	96%
W – Tungsten	33	33	0	0	100%
Au – Gold	108	105	3	0	97%
Overall	247	240	7	0	97%

**8.2 Other Key Statistics**

- 100% 3TG conformant and active rate
- Approximately 77% of our suppliers by spending were RBA / RMI members.
- We generally cover about 95% of our procurement spend in our supply chain, most of which are also in RBA Compliance program where suppliers’ DD efforts are validated by independent 3<sup>rd</sup> party audits. This supplier base consists of Tier 1, Tier 2 and Tier 3 suppliers where we had direct procurement relationships. Some of these suppliers acted in multiple tiers. For example, a supplier may provide components to an outsourced manufacturer as well as directly to Lenovo for in-house manufacturing.
- Approximately 94% of our suppliers by spending have formal sustainability reports and are using the Global Reporting Initiative (GRI) reporting framework.
- Less than half our suppliers are legally required to comply with Dodd-Frank.
- Supplier CMRT & EMRT Response Rate: 100%
- > 95% of our suppliers use CMRT & EMRT with their suppliers, require them to be conformant and request SOR names.
- Number of suppliers with Non-Conformant / Non-Active 3TG SOR: 0
- Number of Non-Conformant / Non-Active 3TG SOR along Lenovo’s supply chain: 0
- 2 3TG SORs were compliant for 2023 but became non-compliant in the first calendar quarter of 2024. Lenovo is working with our suppliers to encourage the SORs to participate again in the RMAP program.

**9.0 Independent Private Sector Audit (IPSA)**



Lenovo designed and implemented our overall RSRM procedures based on, and in conformity with the 5-step framework of OECD Guidance. However, the design of our due diligence process materially conforms to Step 3 and 4 of the OECD Guidance applicable to a “downstream” company with little to no direct influence on SORs.

Lenovo did not conduct an IPSA because IPSA is not required for our reporting year 2023. However, we have evidenced our design and description with the content of this conflict minerals report.

## **10.0 Country of Origin and the 3TG SOR Lists**

### **10.1 Country of Origin**

Dodd-Frank requires issuers to provide their efforts to determine the SOR or location of conflict minerals and to provide the mines or locations as they are identified. However, Dodd-Frank also does recognize OECD requirements which allow then for the valid limitations of down-stream companies to identify the locations of mines. Therefore, our efforts to determine the mine of origin were:

- Identification of SOR and their locations via CMRT and EMRT from our supply chain
- Names and locations of Mines provided by the CMRT and EMRT
- Verification of legitimate SOR provided by the RMI including associated and recognize industry bodies (e.g., LBMA, RJC, TI-CMC)
- Audits / Certification of the SOR with the RMAP which provided on a limited basis the origins of minerals and only via a categorization method
  - ✓ L1 – Countries not identified as conflict regions or plausible areas of smuggling or export from these regions of 3TG
  - ✓ L2 – Countries known or plausible for smuggling or export out of the region or transit of 3TG
  - ✓ L3 – Covered Countries
  - ✓ DRC – Democratic Republic of the Congo

### **10.2 Lenovo 3TG SOR List**

It is important to note that some of the listed SOR content may not actually be in Lenovo products. However, it is our intent, whether the SOR content is in our products or not, to drive towards a precise list of SOR and require them to be validated as conflict-free conformant via the RMAP.

The 3TG SOR List, including, without limitation, all information provided therein, is provided for informational purposes only and is current as of the date set forth therein. Any inaccuracy or omission in the list is not the responsibility of the Lenovo as it is generally well recognized attaining a precise list is a complex and dynamic process. Determination of whether and/or how to use all or any portion of the list is to be made in the user’s sole and absolute discretion and responsibility.

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Lenovo does not make any representations or warranties with respect to the List. The list is provided on an "AS IS" and on an "AS AVAILABLE" basis. Lenovo hereby disclaims all warranties of any nature, express, implied or otherwise, or arising from trade or custom, including, without limitation, any implied warranties of merchantability, non-infringement, quality, title, fitness for a particular purpose, completeness or accuracy.

To the fullest extent permitted by applicable laws, Lenovo renounces any liability for any losses, expenses or damages of any nature, including, without limitation, special, incidental, punitive, direct, indirect or consequential damages or lost income or profits, resulting from or arising out of the User's use of the list, whether arising in tort, contract, statute, or otherwise, even if shown that they were advised of the possibility of such damages.

In consideration for access and use of the list, THE USER, hereby agrees to release and forever discharge Lenovo, as well as their respective officers, directors, agents, employees, volunteers, representatives, contractors, successors, and assignees, from any and all claims, actions, losses, suits, damages, judgments, levies, and executions, which the user has ever had, has, or ever can, shall, or may have or claim to have against Lenovo arising out of the list or use thereof.

If any part of any provision of these terms and conditions shall be invalid or unenforceable under applicable law, said part shall be deemed ineffective to the extent of such invalidity or unenforceability only, without in any way affecting the remaining parts of said provision or the remaining provisions of these terms and conditions.

By accessing and using the List, and in consideration thereof, the user agrees to the foregoing. Following is the List of SOR identified in our supply chains.

**Conformant Smelters**

<b>Metal</b>	<b>Smelter</b>	<b>Location</b>
Tantalum	F&X Electro-Materials Ltd.	CHINESE MAINLAND
Tantalum	Global Advanced Metals Boyertown	UNITED STATES OF AMERICA
Tantalum	TANIOBIS Co., Ltd.	THAILAND
Tantalum	TANIOBIS GmbH	GERMANY
Tantalum	Materion Newton Inc.	UNITED STATES OF AMERICA
Tantalum	TANIOBIS Japan Co., Ltd.	JAPAN
Tantalum	TANIOBIS Smelting GmbH & Co. KG	GERMANY
Tantalum	Jiujiang Tanbre Co., Ltd.	CHINESE MAINLAND
Tantalum	Mitsui Mining and Smelting Co., Ltd.	JAPAN
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CHINESE MAINLAND

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Tantalum	Ulba Metallurgical Plant JSC	KAZAKHSTAN
Tin	Alpha	UNITED STATES OF AMERICA
Tin	China Tin Group Co., Ltd.	CHINESE MAINLAND
Tin	Dowa	JAPAN
Tin	Aurubis Berango	SPAIN
Tin	Fenix Metals	POLAND
Tin	Magnu's Minerais Metais e Ligas Ltda.	BRAZIL
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA
Tin	Aurubis Beerse	BELGIUM
Tin	O.M. Manufacturing Philippines, Inc.	PHILIPPINES
Tin	PT Timah Tbk Mentok	INDONESIA
Tin	Rui Da Hung	TAIWAN
Tin	Thaisarco	THAILAND
Tin	Resind Industria e Comercio Ltda.	BRAZIL
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND
Gold	AngloGold Ashanti Corrego do Sitio Mineracao	BRAZIL
Gold	Argor-Heraeus S.A.	SWITZERLAND
Gold	Asahi Pretec Corp.	JAPAN
Gold	Asaka Riken Co., Ltd.	JAPAN
Gold	CCR Refinery - Glencore Canada Corporation	CANADA
Gold	Chimet S.p.A.	ITALY
Gold	Dowa	JAPAN
Gold	Heimerle + Meule GmbH	GERMANY
Gold	Heraeus Metals Hong Kong Ltd.	HONG KONG, S.A.R of CHINA
Gold	Ishifuku Metal Industry Co., Ltd.	JAPAN
Gold	Istanbul Gold Refinery	TURKEY
Gold	Japan Mint	JAPAN
Gold	Jiangxi Copper Co., Ltd.	CHINESE MAINLAND
Gold	JX Nippon Mining & Metals Co., Ltd.	JAPAN
Gold	LS MnM Inc.	KOREA, REPUBLIC OF

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Gold	Materion	UNITED STATES OF AMERICA
Gold	Matsuda Sangyo Co., Ltd.	JAPAN
Gold	Metalor Technologies (Hong Kong) Ltd.	HONG KONG, S.A.R of CHINA
Gold	Metalor Technologies S.A.	SWITZERLAND
Gold	Metalor USA Refining Corporation	UNITED STATES OF AMERICA
Gold	Mitsubishi Materials Corporation	JAPAN
Gold	Mitsui Mining and Smelting Co., Ltd.	JAPAN
Gold	Nihon Material Co., Ltd.	JAPAN
Gold	Ohura Precious Metal Industry Co., Ltd.	JAPAN
Gold	MKS PAMP SA	SWITZERLAND
Gold	PX Precinox S.A.	SWITZERLAND
Gold	Rand Refinery (Pty) Ltd.	SOUTH AFRICA
Gold	Royal Canadian Mint	CANADA
Gold	SEMPSA Joyeria Plateria S.A.	SPAIN
Gold	Solar Applied Materials Technology Corp.	TAIWAN
Gold	United Precious Metal Refining, Inc.	UNITED STATES OF AMERICA
Gold	Valcambi S.A.	SWITZERLAND
Gold	Western Australian Mint (T/a The Perth Mint)	AUSTRALIA
Tungsten	Wolfram Bergbau und Hutten AG	AUSTRIA
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CHINESE MAINLAND
Tungsten	Xiamen Tungsten Co., Ltd.	CHINESE MAINLAND
Tungsten	Global Tungsten & Powders LLC	UNITED STATES OF AMERICA
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CHINESE MAINLAND
Tungsten	TANIOBIS Smelting GmbH & Co. KG	GERMANY
Tungsten	Masan High-Tech Materials	VIET NAM
Tungsten	A.L.M.T. Corp.	JAPAN
Gold	Aida Chemical Industries Co., Ltd.	JAPAN
Gold	Agosi AG	GERMANY

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Gold	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN
Tungsten	Kennametal Huntsville	UNITED STATES OF AMERICA
Gold	Aurubis AG	GERMANY
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES
Gold	Boliden Ronnskar	SWEDEN
Gold	C. Hafner GmbH + Co. KG	GERMANY
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CHINESE MAINLAND
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINESE MAINLAND
Gold	Chugai Mining	JAPAN
Tin	PT Aries Kencana Sejahtera	INDONESIA
Gold	DSC (Do Sung Corporation)	KOREA, REPUBLIC OF
Gold	Eco-System Recycling Co., Ltd. East Plant	JAPAN
Tin	EM Vinto	BOLIVIA (PLURINATIONAL STATE OF)
Tin	Estanho de Rondonia S.A.	BRAZIL
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINESE MAINLAND
Tantalum	XIMEI RESOURCES (GUANGDONG) LIMITED	CHINESE MAINLAND
Gold	LT Metal Ltd.	KOREA, REPUBLIC OF
Gold	Heraeus Germany GmbH Co. KG	GERMANY
Tungsten	Hunan Chenzhou Mining Co., Ltd.	CHINESE MAINLAND
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CHINESE MAINLAND
Tungsten	Japan New Metals Co., Ltd.	JAPAN
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINESE MAINLAND
Gold	Asahi Refining USA Inc.	UNITED STATES OF AMERICA
Gold	Asahi Refining Canada Ltd.	CANADA
Gold	Kazzinc	KAZAKHSTAN
Tungsten	Kennametal Fallon	UNITED STATES OF AMERICA
Gold	Kennecott Utah Copper LLC	UNITED STATES OF AMERICA

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Gold	Kojima Chemicals Co., Ltd.	JAPAN
Tantalum	AMG Brasil	BRAZIL
Tin	Metallic Resources, Inc.	UNITED STATES OF AMERICA
Gold	Metalor Technologies (Suzhou) Ltd.	CHINESE MAINLAND
Gold	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	MEXICO
Tantalum	Metallurgical Products India Pvt., Ltd.	INDIA
Tin	Mineracao Taboca S.A.	BRAZIL
Tantalum	Mineracao Taboca S.A.	BRAZIL
Tin	Minsur	PERU
Tin	Mitsubishi Materials Corporation	JAPAN
Tantalum	NPM Silmet AS	ESTONIA
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	TURKEY
Tin	Jiangxi New Nanshan Technology Ltd.	CHINESE MAINLAND
Gold	Navoi Mining and Metallurgical Combinat	UZBEKISTAN
Tin	Operaciones Metalurgicas S.A.	BOLIVIA (PLURINATIONAL STATE OF)
Gold	PT Aneka Tambang (Persero) Tbk	INDONESIA
Tin	PT Artha Cipta Langgeng	INDONESIA
Tin	PT Babel Inti Perkasa	INDONESIA
Tin	PT Babel Surya Alam Lestari	INDONESIA
Tin	PT Bukit Timah	INDONESIA
Tin	PT Mitra Stania Prima	INDONESIA
Tin	PT Prima Timah Utama	INDONESIA
Tin	PT Refined Bangka Tin	INDONESIA
Tin	PT Sariwiguna Binasentosa	INDONESIA
Tin	PT Stanindo Inti Perkasa	INDONESIA
Tin	PT Timah Tbk Kundur	INDONESIA
Tin	PT Tommy Utama	INDONESIA
Tantalum	QuantumClean	UNITED STATES OF AMERICA

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Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINESE MAINLAND
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHINESE MAINLAND
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CHINESE MAINLAND
Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN
Tantalum	Taki Chemical Co., Ltd.	JAPAN
Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN
Tantalum	Telex Metals	UNITED STATES OF AMERICA
Gold	Shandong Gold Smelting Co., Ltd.	CHINESE MAINLAND
Gold	Tokuriki Honten Co., Ltd.	JAPAN
Gold	Torecom	KOREA, REPUBLIC OF
Gold	Umicore S.A. Business Unit Precious Metals Refining	BELGIUM
Gold	Yamakin Co., Ltd.	JAPAN
Gold	Yokohama Metal Co., Ltd.	JAPAN
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINESE MAINLAND
Tin	Tin Smelting Branch of Yunnan Tin Co., Ltd.	CHINESE MAINLAND
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINESE MAINLAND
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CHINESE MAINLAND
Gold	SAFINA A.S.	CZECHIA
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINESE MAINLAND
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CHINESE MAINLAND
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CHINESE MAINLAND
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINESE MAINLAND
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CHINESE MAINLAND
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINESE MAINLAND
Tin	CV Venus Inti Perkasa	INDONESIA
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINESE MAINLAND
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CHINESE MAINLAND
Tungsten	Asia Tungsten Products Vietnam Ltd.	VIET NAM
Tin	PT ATD Makmur Mandiri Jaya	INDONESIA



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Tantalum	D Block Metals, LLC	UNITED STATES OF AMERICA
Tantalum	FIR Metals & Resource Ltd.	CHINESE MAINLAND
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINESE MAINLAND
Gold	MMTC-PAMP India Pvt., Ltd.	INDIA
Gold	KGHM Polska Miedz Spolka Akcyjna	POLAND
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINESE MAINLAND
Tungsten	Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch	CHINESE MAINLAND
Tantalum	KEMET de Mexico	MEXICO
Tungsten	H.C. Starck Tungsten GmbH	GERMANY
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINESE MAINLAND
Tantalum	Global Advanced Metals Aizu	JAPAN
Tin	CV Ayi Jaya	INDONESIA
Gold	T.C.A S.p.A	ITALY
Gold	REMONDIS PMR B.V.	NETHERLANDS
Tungsten	Niagara Refining LLC	UNITED STATES OF AMERICA
Tin	PT Rajehan Ariq	INDONESIA
Gold	Korea Zinc Co., Ltd.	KOREA, REPUBLIC OF
Gold	TOO Tau-Ken-Altyn	KAZAKHSTAN
Tungsten	China Molybdenum Tungsten Co., Ltd.	CHINESE MAINLAND
Tin	PT Cipta Persada Mulia	INDONESIA
Tantalum	Resind Industria e Comercio Ltda.	BRAZIL
Gold	L'Orfebre S.A.	ANDORRA
Gold	Italpreziosi	ITALY
Gold	WIELAND Edelmetalle GmbH	GERMANY
Gold	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	AUSTRIA
Tin	PT Sukses Inti Makmur (SIM)	INDONESIA
Tungsten	Philippine Chuangxin Industrial Co., Inc.	PHILIPPINES
Tin	PT Menara Cipta Mulia	INDONESIA
Tantalum	Jiangxi Tuohong New Raw Material	CHINESE MAINLAND

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Gold	SungEel HiMetal Co., Ltd.	KOREA, REPUBLIC OF
Gold	Planta Recuperadora de Metales SpA	CHILE
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CHINESE MAINLAND
Gold	NH Recytech Company	KOREA, REPUBLIC OF
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CHINESE MAINLAND
Tin	PT Bangka Serumpun	INDONESIA
Tin	Tin Technology & Refining	UNITED STATES OF AMERICA
Tin	PT Rajawali Rimba Perkasa	INDONESIA
Tin	Luna Smelter, Ltd.	RWANDA
Tungsten	Lianyou Metals Co., Ltd.	TAIWAN
Tungsten	Hubei Green Tungsten Co., Ltd.	CHINESE MAINLAND
Gold	Eco-System Recycling Co., Ltd. North Plant	JAPAN
Gold	Eco-System Recycling Co., Ltd. West Plant	JAPAN
Tin	PT Mitra Sukses Globalindo	INDONESIA
Tungsten	Cronimet Brasil Ltda	BRAZIL
Tin	CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda	BRAZIL
Tin	CRM Synergies	SPAIN
Gold	Metal Concentrators SA (Pty) Ltd.	SOUTH AFRICA
Tin	Fabrica Auricchio Industria e Comercio Ltda.	BRAZIL
Tantalum	RFH Yancheng Jinye New Material Technology Co., Ltd.	CHINESE MAINLAND
Tungsten	Fujian Xinlu Tungsten Co., Ltd.	CHINESE MAINLAND
Tin	DS Myanmar	MYANMAR
Tin	PT Putera Sarana Shakti (PT PSS)	INDONESIA
Gold	Abington Reldan Metals, LLC	UNITED STATES OF AMERICA
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	CHINESE MAINLAND
Tin	PT Bangka Prima Tin	INDONESIA
Tin	PT Timah Nusantara	INDONESIA
Tin	Super Ligas	BRAZIL
Tin	PT Tinindo Inter Nusa	INDONESIA

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Gold	WEEEREFINING	FRANCE
Tin	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	CHINESE MAINLAND
Tin	HuiChang Hill Tin Industry Co., Ltd.	CHINESE MAINLAND
Gold	Gold by Gold Colombia	COLOMBIA
Tin	PT Premium Tin Indonesia	INDONESIA
Tin	Soft Metais Ltda.	BRAZIL
Tungsten	Tungsten Vietnam Joint Stock Company	VIET NAM
Gold	Coimpa Industrial LTDA	BRAZIL
Tantalum	PowerX Ltd.	RWANDA
Tungsten	Hunan Jintai New Material Co., Ltd.	CHINESE MAINLAND
Gold	Bangalore Refinery	INDIA
Tin	Mining Minerals Resources SARL	CONGO, DEMOCRATIC REPUBLIC OF THE
Tantalum	Jiujiang Janny New Material Co., Ltd.	CHINESE MAINLAND
Gold	Cendres + Metaux S.A.	SWITZERLAND
Gold	Samduck Precious Metals	KOREA, REPUBLIC OF
Gold	Umicore Precious Metals Thailand	THAILAND
Gold	Singway Technology Co., Ltd.	TAIWAN
Gold	Al Etihad Gold Refinery DMCC	UNITED ARAB EMIRATES
Gold	SAAMP	FRANCE
Gold	8853 S.p.A.	ITALY
Gold	Safimet S.p.A	ITALY
Gold	Daye Non-Ferrous Metals Mining Ltd.	CHINESE MAINLAND
Gold	Great Wall Precious Metals Co., Ltd. of CBPM	CHINESE MAINLAND
Gold	Shenzhen CuiLu Gold Co., Ltd.	CHINESE MAINLAND
Gold	ABC Refinery Pty Ltd.	AUSTRALIA
Gold	Dongwu Gold Group	CHINESE MAINLAND
Tantalum	Zhuzhou Cemented Carbide Group Co., Ltd.	CHINESE MAINLAND
Tin	Modeltech Sdn Bhd	MALAYSIA
Gold	Alexy Metals	UNITED STATES OF AMERICA

**Active Smelters**

<b>Metal</b>	<b>Smelter</b>	<b>Location</b>
Tin	White Solder Metalurgia e Mineracao Ltda.	BRAZIL
Gold	Advanced Chemical Company	UNITED STATES OF AMERICA
Gold	GGC Gujrat Gold Centre Pvt. Ltd.	INDIA
Gold	Augmont Enterprises Private Limited	INDIA
Tin	PT Belitung Industri Sejahtera	INDONESIA
Tin	Precious Minerals and Smelting Limited	INDIA
Tantalum	Guangdong Rising Rare Metals-EO Materials Ltd.	CHINESE MAINLAND

**Outreach / In-Communications Smelters: Not Applicable**

**11.0 Cobalt Due Diligence**

The mining of cobalt has been linked to OECD Annex II risks including child labor and other human rights abuses in the Covered Countries. Lenovo has implemented the OECD Guidance for the sourcing of this mineral and expects suppliers to participate in our cobalt due diligence process. As with 3TG, responsible sourcing of cobalt is a complex issue that requires industry-wide collaboration.

**11.1 Lenovo’s Cobalt Survey Cycle Performance**

Lenovo fully supports efforts of the RMI to address materials beyond 3TG. In 2023, we formally conducted a full cobalt supply chain due diligence effort by collecting Cobalt survey template from suppliers covering 95% overall spend, received 100% respond rate. We estimated that our supply chain is 58% conformant and 64% including smelters active with the RMI to become conformant.

However, as Lenovo is working hard to onboard cobalt SORs into the RMAP program, we believe that the action to take at this point is to continue to engage with cobalt SOR in our supply chain and encourage them to participate in a third-party audit program.

Our [Cobalt Policy and Statement](#) set expectations for suppliers to follow OECD Guidance for cobalt, and to participate in Lenovo’s due diligence processes and capability building efforts around responsible cobalt sourcing.

In 2024, Lenovo will continue to coordinate with the RMI as they perform risk profiles on other materials, assess their content in our products, and develop due diligence efforts to mitigate supply chain risk. We will also drive due diligence effort same as we do for 3TG and work with RMI to develop tools and programs, to assure our commitment to transparency and respect for human rights.

## 11.2 Lenovo Cobalt SOR List

### Conformant Cobalt Smelters:

Smelter	Location
Umicore Olen	BELGIUM
Umicore Finland Oy	FINLAND
Compagnie de Tifnout Tiranimine	MOROCCO
Mine de Bou-Azzer	MOROCCO
Murrin Murrin Nickel Cobalt Plant	AUSTRALIA
Gem (Jiangsu) Cobalt Industry Co., Ltd.	CHINESE MAINLAND
Lanzhou Jinchuan Advanced Materials Technology Co., Ltd.	CHINESE MAINLAND
Ganzhou Tengyuan Cobalt New Material Co., Ltd.	CHINESE MAINLAND
Guangxi Yinyi Advanced Material Co., Ltd.	CHINESE MAINLAND
Zhejiang Huayou Cobalt Company Limited	CHINESE MAINLAND
Dynatec Madagascar Company	MADAGASCAR
Quzhou Huayou Cobalt New Material Co., Ltd.	CHINESE MAINLAND
Niihama Nickel Refinery, Sumitomo Metal Mining	JAPAN
Guangdong Jiana Energy Technology Co., Ltd.	CHINESE MAINLAND
SungEel HiTech Co., Ltd.	KOREA, REPUBLIC OF
Jiangxi Jiangwu Cobalt Industrial Co., Ltd.	CHINESE MAINLAND
Ganzhou Highpower Technology Co., Ltd.	CHINESE MAINLAND
NORILSK NICKEL HARJAVALTA OY	FINLAND
Hunan Yacheng New Materials Co., Ltd.	CHINESE MAINLAND
Hunan CNGR New Energy Science & Technology Co., Ltd.	CHINESE MAINLAND
Cosmo Chemical, Ltd.	KOREA, REPUBLIC OF
CoreMax Corporation	TAIWAN
Chizhou CN New Materials and Technology Co., Ltd.	CHINESE MAINLAND
Mechema Taiwan Plant 2	TAIWAN
Harima Refinery, Sumitomo Metal Mining	JAPAN
Guizhou CNGR Resource Recycling Industry Development Co., Ltd.	CHINESE MAINLAND
Anhui Hanrui New Material Co., Ltd.	CHINESE MAINLAND

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Port Colborne Refinery	CANADA
Jingmen GEM Co., Ltd.	CHINESE MAINLAND
Zhuhai Kelixin Metal Materials Co., Ltd.	CHINESE MAINLAND
Tianjin Maolian Science & Technology Co., Ltd.	CHINESE MAINLAND
Kamoto Copper Company	CONGO, DEMOCRATIC REPUBLIC OF THE
Chemaf Etoile	CONGO, DEMOCRATIC REPUBLIC OF THE
La Compagnie de Traitement des Rejets de Kingamyambo S.A. (Metalkol S.A.)	CONGO, DEMOCRATIC REPUBLIC OF THE
Jiangsu Xiongfeng Technology Co., Ltd.	CHINESE MAINLAND
Zhejiang New Era Zhongneng Technology Co., Ltd.	CHINESE MAINLAND
Ningbo Hubang New Material Co., Ltd.	CHINESE MAINLAND
Zhejiang Greatpower Cobalt Materials Co., Ltd.	CHINESE MAINLAND
SOCIETE MINIERE DU KATANGA (SOMIKA SARL)	CONGO, DEMOCRATIC REPUBLIC OF THE
Societe pour le Traitement du Terril de Lubumbashi (STL)	CONGO, DEMOCRATIC REPUBLIC OF THE
Jervois Finland OY	FINLAND
Mutanda Mining SPRL	CONGO, DEMOCRATIC REPUBLIC OF THE
Kisanfu Mining (Kimin)	CONGO, DEMOCRATIC REPUBLIC OF THE
Jiangxi Miracle Golden Tiger Cobalt Co. Ltd.	CHINESE MAINLAND
Eti Bakir A.S	TURKEY

**Active Cobalt Smelters:**

<b>Smelter</b>	<b>Location</b>
Hunan Jinxin New Material Holding Co., Ltd.	CHINESE MAINLAND
Tenke Fungurume Mining SA	CONGO, DEMOCRATIC REPUBLIC OF THE
ICoNiChem	UNITED KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND

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Guangdong Fangyuan New Materials Group Co., Ltd.	CHINESE MAINLAND
Fujian Evergreen New Energy Technology Co.	CHINESE MAINLAND

**Outreach / In-Communications / Communication Suspended / RMI Due Diligence Review / Non Conformant Cobalt Smelters**

<b>Smelter</b>	<b>Location</b>
Glencore Nikkelverk Refinery	NORWAY
Fort Saskatchewan Metals Facility	CANADA
Hunan Brunp Recycling Technology Co., Ltd.	CHINESE MAINLAND
Nantong Xinwei Nickel Cobalt Technology Development Co., Ltd.	CHINESE MAINLAND
Gangzhou Yi Hao Umicore Industry Co.	CHINESE MAINLAND
Nanjing Hanrui Cobalt	CHINESE MAINLAND
Vale New Caledonia	NEW CALEDONIA
XTC New Energy Materials (Xiamen) LTD.	CHINESE MAINLAND
Ningbo Yanmen Chemical Co., Ltd.	CHINESE MAINLAND
Jiangxi Rui da Xinnengyuan Technology Co., Ltd.	CHINESE MAINLAND
Xiangtan Huacheng Nickel Cobalt New Material Co., Ltd.	CHINESE MAINLAND
Fairsky Industrial Co., Limited	CHINESE MAINLAND
Mechema Taiwan Plant 1	TAIWAN
Mechema Korea, Co., Ltd.	KOREA, REPUBLIC OF
Mechema Chemicals shang-yu	CHINESE MAINLAND
Mechema Chemicals (Thailand) Co., Ltd.	THAILAND
PT Mechema Indonesia	INDONESIA
Hefei Rongjie Metal Technology Co., Ltd.	CHINESE MAINLAND
Vale - Long Harbour Processing Plant (LHPP)	CANADA
W&Q Metal Products Co., Limited	CHINESE MAINLAND
Vital Materials Workshop	CHINESE MAINLAND
METAL MINES SARL	CONGO, DEMOCRATIC REPUBLIC OF THE



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MKM - La Miniere de Kalumbwe Myunga	CONGO, DEMOCRATIC REPUBLIC OF THE
Ruashi Mining SAS	CONGO, DEMOCRATIC REPUBLIC OF THE
Hunan Shiji Yintian New Material Co., Ltd.	CHINESE MAINLAND
JSC Kolskaya Mining and Metallurgical Company (Kola MMC)	RUSSIAN FEDERATION
Zhejiang Power New Energy Materials Co., Ltd.	CHINESE MAINLAND
Vital Materials Plant	CHINESE MAINLAND

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