

DATE: **October 2014**



SUBJECT: **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 world-wide. Lenovo and 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 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.
- Support efforts of key stakeholders, including governmental bodies, industry groups and other concerned organizations, 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 Electronics Industries Citizenship Coalition (EICC), of which Lenovo has been a member since 2006.
- Participate in the EICC Conflict Free Sourcing Initiative (CFSI) programs.
- Use the EICC Conflict Minerals Reporting Template (CMRT) and the Conflict-Free Smelter Program (CFSP) to only source from smelters validated by industry acceptable protocols.
- Demonstrate leadership with these actions to drive continual improvement within China.

In addition, Lenovo contractually requires its suppliers to:

- Comply with all environmental laws and material content restrictions.
- Implement the EICC Code of Conduct, conduct EICC Audits and report Corrective Actions to ensure compliance for responsible sourcing of minerals.
- Require their upstream suppliers to comply with the EICC 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 working towards sourcing only conflict-free minerals and to use minerals only from smelters that have been audited and verified by CFSP 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, please contact [environment@lenovo.com](mailto:environment@lenovo.com).

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

David B. Martin – Supply Chain Procurement Sustainability Manager  
1009 Think Place  
Morrisville, NC 27560