

CONFLICT MINERALS REPORT OF LENOVO GROUP UNLIMITED

IN ACCORD WITH RULE 13P-1 UNDER THE SECURITIES EXCHANGE ACT OF 1934

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1.0 Overview

Lenovo is a global company that is incorporated and headquartered in Hong Kong, with operational centers located strategically around the world to drive Lenovo's global/local business approach. We have about 54,000 employees serving customers in more than 160 countries.

Lenovo is devoted to conduct socially, environmentally and ethically responsible sourcing and business practices with our products, employees, sites, and suppliers. A full overview of Lenovo including our products, culture, and management as well as our Conflict Minerals policy can be found on www.lenovo.com.

This Conflict Minerals Report of Lenovo Group Limited (Lenovo) for calendar year 2015 is in accordance with Rule 13p-1 under the Securities Exchange Act of 1934 ("Rule 13p-1"). This ruling is also known as Dodd-Frank or SEC 1502.

Lenovo has utilized the Organization for the Economic Cooperation and Development (OECD) Guidance for conflict minerals and the Electronics Industry Citizenship Coalition (EICC) programs to conduct our responsible supply chain sourcing efforts for Reasonable Country of Origin Inquiry (RCOI) and Due Diligence efforts. Both programs are internationally recognized and industry standard practices and act as the design framework of our conflict mineral program and our due diligence efforts.

This conflict mineral report does not attempt to explain the all elements of above OECD guidance or the EICC programs, but the information may be obtained from the following links:

- <http://www.oecd.org/corporate/mne/GuidanceEdition2.pdf>
- <http://www.conflictreesourcing.org/>

Our specialized disclosure was signed by our Director of Regulatory Affairs, Sustainability & Corporate Safety and Standards.

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2.0 Definition / Glossary

Definition

Conflict minerals are defined as raw mineral sources of Tin, Tantalum, Tungsten and Gold that are determined to be financing conflict in the Democratic Republic of the Congo or an adjoining country. They are frequently referred to as 3TG.

Glossary

- CFSI – Conflict Free Smelter Initiative
- CMRT – Conflict Minerals Reporting Template
- CFSP – Conflict Free Smelter Program
- CC – Covered Countries (also known as the adjoining countries of the DRC)
- DD – Due Diligence (Verify / Check)
- DRC – Democratic Republic of the Congo
- EICC – Electronics Industry Citizenship Coalition (<http://www.eiccoalition.org/>)
- OECD – Organization for the Economic Cooperation and Development (www.oecd.org)
- RCOI – Responsible Country of Origin Inquiry (Survey / Ask)
- SET – Smelter Engagement Team
- SOR – Smelter or Refiner
- 3TG – Tin, Tantalum, Tungsten & Gold

3.0 Reasonable Country of Origin Inquiry (RCOI)

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

Lenovo conducted a Reasonable Country of Origin inquiry (RCOI) to determine if conflict minerals did originate in the Democratic Republic of the Congo (DRC) or the Covered Countries (CC). We used the EICC Conflict Free Sourcing Initiative (CFSI) program for RCOI by using the Conflict Minerals Reporting Template (CMRT) which is widely used by the industry. We also required our suppliers to use the CMRT's with their supplier bases.

In our RCOI, we surveyed 90% of our suppliers by spending amounts and achieved a 100% response rate from surveyed suppliers (95% of core business was surveyed and recent acquisitions decreased the overall program coverage). Responses were checked for completeness, consistency and issues. Supplier conflict mineral policies were directly validated. Incomplete CMRT's or those with other issues were returned for corrective action (i.e. policy link invalid). Reported countries of origin are identified in Section 110 Country of Origin and Smelter and Refiner lists. Also identified Smelters or Refiners (SOR's) have been provided to the CFSI to ensure engagement by the Smelter Engagement Team (SET).

4.0 Conflict-Free Determination

Based on the RCOI and good faith efforts, Lenovo did have reason to believe that the conflict minerals may have originated in the DRC or the CC. Therefore, we conducted Due Diligence (DD) on the source and custody of conflict minerals in our products and created this Conflict Minerals Report (CMR) with the required elements. Compliant suppliers are only identified as conflict-free if they have been audited by the CFSI or other relevant and approved industry bodies.

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Furthermore, based on due diligence described further in this report, Lenovo has not yet fully determined that the conflict minerals have not financed or benefited armed groups in the region. However we did achieve 100% conflict-free with the reported and verified Tantalum smelters. Furthermore, we estimate that we are 75% conflict-free with all our products.

5.0 OECD Due Diligence Standard Implementation

Lenovo conforms to the OECD guidance entitled, "OECD Due Diligence Guidance for Responsible Supply Chains for Minerals from Conflict-Affected and High-Risk Areas".

The guidance and associated requirements recognizes our position in the overall supply chain where Lenovo sells technology products and services to end-users where we act as a final "downstream" retailer. A significant portion of the parts we buy, Lenovo exercises no influence on the parts, ingredients or components in them. Most is generic product where we only specified or negotiated contractual terms with a manufacturer that did not relate to the manufacturing of the product (e.g. price and legal terms). For example we do not direct Intel how to design, source and make CPU's.

More specifically, Lenovo did not purchase raw or refined ore, and we did no direct purchasing in the DRC or adjoining countries. We did not have any direct visibility to the further "upstream" mines of origin, the buyers/sellers/consolidators/intermediaries, the transit routes, and the "mid-stream" Smelter's or Refiners. Lenovo is in fact is not only numerous supply chain tiers away from the mines of origin, but we were many tiers removed from Smelters or Refiners (SOR's) as well.

Therefore Lenovo by far is not a manufacturer or nor "contracts to manufacture" per the Dodd-Frank definition, and we were a final assembly/test operation and acted more as a retailer.

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 containing derivatives.

The OECD Due Diligence Guidance clearly recognizes this complexity and further states:

- Downstream companies who may find it difficult to identify actors upstream from their direct suppliers (due to their size or other factors), may engage and actively cooperate with other industry members with whom they share suppliers or downstream companies with whom they have a business relationship to carry out the recommendation in this section (identify & assess) in order to identify the SOR's in their supply chain and assess their due diligence practices. Companies may also identify through industry validation schemes the SOR's that meet the requirements of this Guidance in order to source from them.

As a result of our supply chain position and recognizing the complexities allowed by OECD guidance, Lenovo conducted RCOI to trace to SOR's, and we focused our efforts on identification, audits and certification for SOR's to be conflict-free compliant. Upon identification Lenovo used the following EICC CFSI programs efforts for smelter audits and certification:

- Conflict Free Smelter Program (CFSP) to help conduct DD and to establish business process and protocol for SOR auditing and certification. Additionally this program provided country of origin information identified from actual audits.

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- Smelter Engagement Team (SET) workgroup efforts to verify smelters as legitimate, to conduct outreach to drive them for certification and to track the status of all smelters/refiners.
- 3TG Industry Program Alliances: Leveraging other industry organization efforts on conflict-minerals which provide additional RCOI and DD information. The organizations included the London Bullion Market Association (LBMA), the Responsible Jewelers Council (RJC), and the Tungsten Industry – Conflict Minerals Council (TI-CMC).

6.0 OECD Measure Taken

Following are the measures taken by Lenovo to comply with OECD, Dodd-Frank and EICC to prevent the use of conflict free minerals contributing to conflict. Several of these details are also provided in our annual Sustainability report.

6.1 Establish Strong Management Systems

- We have created a formal and public Conflict Minerals Policy which may be found at:
 - ✓ [Conflict Minerals Policy](#)
- Lenovo had a formal organization structure for Sustainability and Conflict Minerals. There is a Chief Sustainability Officer, a Director of Regulatory Affairs, Sustainability & Corporate Safety and Standards, Corporate Global Environmental Affairs department and Procurement team for execution of conflict minerals programs, actions and reporting.
- We established within Lenovo a system of controls and transparency over the supply chain that allowed the identification of SOR's of conflict minerals. First, we executed the EICC CFSI programs for RCOI to identify the SOR's. Second, we maintained all records on a computerized database. Third, through the use of the EICC reporting web application (EICC-ON), we had an electronic information sharing application with suppliers.
- We have taken several measures to establish and to continue to enhance our supplier engagement. First 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 had a Lenovo Supplier Advisory Council of our Top 20 suppliers who meet with our senior executive engagement semi-annually. Second, we established our expectations via formal communications, supplier EICC Agreements and our Lenovo policy. Third, we ensured compliance with Supplier Annual Self-Assessments reported through EICC tools (i.e. EICC-ON), Supplier Biennial Audits (with EICC approved third party auditors), and the associated Corrective Action Plans. During 2015 we strengthened our efforts by executing a new EICC supplier agreement terms and conditions to extend the EICC Code on Responsible Sourcing of Minerals (Ethics #7). Specifically we amended our existing agreement to include that suppliers shall:
 - ✓ The supplier shall conduct reasonable efforts to be conflict-free and to require their suppliers to be conflict-free.
 - ✓ The supplier shall use the EICC CMRT with their suppliers to trace the chain of custody of conflict mineral in their supply chain, to consolidate the information to generate and to report the supplier's company CMRT report.

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- ✓ The supplier shall require their Tier 1 suppliers additionally to use the CMRT with their suppliers.
- ✓ The supplier then shall use these inquiries to identify the smelters in their supply chain and to conduct reasonable efforts to source from smelters validated "conflict-free" by a recognized industry program or body such as the EICC Conflict Free Smelter Program (CFSP) or similar organizations.

Also we commenced integration of new supplier bases obtained through two recent company acquisitions (former IBM System X division and Motorola Mobility).

- For company or industry grievances, Lenovo has several company mechanisms. Internally we have several corporate policies (e.g. Reporting Unlawful or Inappropriate Conduct, Environmental Affairs, etc.) as well as a formal employee Code of Conduct covering 33 specific areas of focus and where to go for help. For industry or external grievance, we have a contact identified in our conflict minerals policy and asked concerned parties to contact "**environment@lenovo.com.**"

6.2 Identify & Assess Risk

Since there are many complex risks in ensuring a conflict-free supply chain, and the OECD Due Diligence guidance recognizes the difficulty of downstream companies to identify upstream actors, Lenovo's goal was to identify the SOR's in our supplier chain using standard industry wide schemes and whether the conflict minerals came from the DRC or adjoining countries

The key resulting risks were then:

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

Another risk associated with our efforts on risk identification and risk response is whether the reporting of our actions is comprehensive, complete and met external stakeholders (e.g. Customers, Non-Governmental Organizations, etc.)

6.3 Design/Implement Response Strategy

Therefore Lenovo's strategic objective to sufficiently respond to and to mitigate the risk was to understand all the SOR's in our supply chain and either get them certified or ultimately discontinue usage of them. The initiatives designed to drive towards that objective were as follows:

Lenovo's strategy to respond to the risks was as follows:

- Smelter/Refiner Certification

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- ✓ We continued the use of CFSP programs so that only conflict-free compliant smelters are used and leveraged the Smelter Engagement Team (SET) workgroup efforts on compliant smelters, outreach smelters, alleged smelters and active smelters.
- Smelter/Refiner Discontinuation
 - ✓ Since many of the SOR's are shared by hundreds of companies and many EICC/CFSI members, our strategy is to use our collective power to drive positive changes. In the event those efforts are not successful, Lenovo will participate in joint efforts to discontinue use of those smelters who refuse to be audited and certified. It is important to note that there are distinct challenges to actual and verified removals of SOR's from supply chains. The CFSI recognizes positive efforts are better in the long-run for all involved parties.
- Internal Reporting & Awareness
 - ✓ On-Demand: Announcements of key events such as CMR posting, CMRT status.
 - ✓ Monthly Metrics: Reporting of annual CMRT survey status of kickoff and completion
 - ✓ Newsletters: Quarterly key news, events, concerns and key links
 - ✓ Education: Semi-Annual education sessions
 - ✓ Program Status: Semi-Annual on programs status and latest events
 - ✓ Management: Annual Lenovo sustainability review
- External Reporting
 - ✓ Public Conflict Minerals Policy and Conflict Minerals Report.
 - ✓ Program information was provided externally and will continue to be provided publicly in our Corporate Sustainability Report, Corporate Annual Report and Supply Chain Sustainability on our internet webpages.
 - ✓ We also provided and will provide our due diligence measures to Customers and external stakeholders upon request.
 - ✓ Maintain our public policy on Conflict Minerals.
- OECD Due Diligence Guidance
 - ✓ Lenovo will continue to actively promote the observance of the guidance, take measures to integrate the 5-step framework into our management systems and to ensure the widest possible dissemination of the guidance.
- Key Stakeholder Expectations
 - ✓ We reviewed the assessment of industry and Lenovo previous conflict minerals reporting from key external stakeholders (e.g. Responsible Sourcing Network/Sustainalytics, Assent Compliance/Tulane University and Green Status Pro) and took action to ensure compliance to their expectations.

6.4 Carry Out Independent 3rd Party Audits

As noted above, Lenovo will use the CFSP and the SET drive audits of smelter/refiners. Please see section 8.0 for the status of SOR's supply chain and section 11.0 for the list of the actual SOR's.

6.5 Report Publicly on Due Diligence

As noted above, Lenovo publishes publicly our due diligence policies and practices efforts. This reporting and all of Lenovo's other sustainability efforts are available at: [Lenovo Social Responsibility Resources](#).

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7.0 Additional Measures to be Taken

Lenovo will take further steps in calendar year 2016 to improve our efforts and results. We have a goal of improving our overall conflict-free posture by 10 points in CY2016. (See CY201 results in Section 8.0 below).

First, we will implement a new supplier code of conduct refreshing our current code to ensure full coverage of social, environmental and ethical requirements for responsible sourcing elements. Our general supplier code previously did not have a strong contractual linkage, and our supplier EICC agreements which specifically drove conflict minerals due diligence were targeted to be executed on about 95% of our procurement business. This new code will be contractual obligations for all suppliers and also includes a grievance mechanism. This code has already been published and can be found at http://www.lenovo.com/social_responsibility/us/en/Supplier_Code_of_Conduct.pdf

Second as previously noted, recent company acquisitions increased our overall supplier base and reduced our overall conflict mineral program coverage. We will drive to ensure 95% coverage of all suppliers by spending is covered in our RCOI and DD efforts including newly acquired businesses.

Third, due to the complexity of multiple supplier sustainability programs along with Conflict Minerals (e.g. EICC Code of Conduct and Environmental Impact of GHG/Water/Waste), we will create a master supplier report card of 25+ key indicators across the programs to identify the best performing as well as the least performing suppliers in the sustainability space.

Forth, we will increase our direct participation in the CFSI and SET team efforts. We will assign a resource to join the team conduct more direct outreach with SOR's. We anticipate that in CY2016 we will take some actions to formally request removal/discontinuation of SOR's from the supply chain.

Finally we will commence efforts to enlarge our due diligence on conflict mineral another supply chain risks (i.e. Cobalt) to ensure Lenovo is not contributing to negative societal impacts.

Progress on these efforts will be publicly reporting in our annual Corporate Sustainability Report.

8.0 Smelter and Refiner Key Indicators

From Lenovo's RCOI and DD efforts we have identified most of the SOR's in our supply chain and determined how many are conflict-free compliant. The below table indicates our CY2015 performance. It is important to note that many SOR's who are reported in supply chains do not actual refine and process ore and have to be validated as legitimate SOR's before we proceed to audit and certifications. Therefore some SOR's are "alleged" to be SOR's, and we track our performance both ways.

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Conflict Mineral	Total	Compliant	Active	Legitimate	Alleged	% Conflict Free
Ta - Tantalum	42	42	0	0	0	100%
S - Tin	101	58	11	8	24	57% with Alleged 75% without Alleged
W - Tungsten	39	26	10	2	1	67% % with Alleged 68% without Alleged
Au - Gold	120	76	10	25	9	63% with Alleged 68% without Alleged
Overall	302	202	31	35	34	63% % with Alleged 75% without Alleged

While 21 of the known SOR's that do source mineral ore from the DRC/CC, all are conflict-free compliant. The list of smelters/refiners and their country of origin are included in Section 11.0 of this report.

9.0 Independent Private Sector Audit (IPSA)

The objective of the IPSA is to express an opinion or conclusion as to whether the:

- *Design* of the issuer's due diligence framework is in conformity with, in all material respects, the criteria set forth in the nationally or internationally recognized due diligence framework used by the issuer, and
- *Description* of the due diligence measures it performed is consistent with the due diligence process that the issuer undertook and actually performed the work described.

Lenovo designed and implemented our overall conflict minerals procedures based on, and in conformity with the five step framework of OECD. However the design of our due diligence process materially conforms to Steps 3 and 4 of the OECD Guidance applicable to a "downstream" company with little to no direct influence on smelters/refiners.

Lenovo did not conduct an IPSA because we did not achieve a conflict-free determination, and IPSA's are not required until then. However we have evidenced our design and description with the content of this conflict minerals report.

10.0 Responsible Sourcing Network (RSN) / Enough Expectations.

These two non-governmental stakeholders have articulated expectations they have for issuer's conflict minerals reports to ensure sufficient granularity in the reporting of policies, programs and efforts. Following is a summary of Lenovo's compliance to these expectations. It is Lenovo's intent to comply with these expectations as best possible and several have been addressed in the CMR content above.

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While the aforementioned expectations are a couple of years old they are still valid. Furthermore, it is also important to note that Lenovo has actively addressed the current expectations expressed by RSN and other interested stakeholders (e.g. Responsible Sourcing Network, Sustainalytics, Assent Compliance, add Green Status Pro) in our CMR.

10.1 Conflict Minerals Policy & Program

Key Elements

Lenovo has a comprehensive conflict minerals policy that:

- Articulated our commitment to responsible sourcing.
- Committed to exercising supply chain due-diligence.
- Implemented a supply chain transparency system that allows for identification of smelters.
- Program included the description of steps to identify, assess, mitigate and respond to risks.
- Policy was publicly disclosed and easy to locate.
- Policy was applicable across the company.

Best Practices

Our policy and program included:

- Commitment to source conflict-free 3TG from covered countries and from smelters.
- Commitment for responsible sourcing in all communities we operation and not just the 3TG covered countries and to comply with all laws.
- Policy and supplier expectations and requirements (contractual obligations) were referenced in supplier agreements.
- Maintaining records a minimum of 5 years is stated.

Key Indicators

- Publicly disclosed and easy to find:
 - ✓ Our [Conflict Minerals Policy](#) was included on our internet website along with all our [Social Responsibility Resources](#).
- Key elements of this expectations document were included in the policy and program:
 - ✓ Our policy and program was created with these expectations, as well as OECD, Dodd-Frank and EICC expectations.
- Percentage of need to know company staff have been made aware and educated:
 - ✓ 100% of pertinent employees are made aware of news, current topics, program status and key links to supporting documentation on a quarterly basis.
- Percentage of suppliers that have received a copy of the policy and program and have been educated.
 - ✓ While quantitative metrics are not tracked, >90% of our spend has been provided our policy and program and requested to participate in our program. Also 75% of our procurement spend were EICC/GeSI members should have already been educated, and we attained a 100% response rate for our CMRT surveys.

10.2 Reasonable Country of Origin Inquiry (RCOI)

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Lenovo conducts an industry standard method of RCOI and steps to reduce the amount of products containing 3TG material of not yet determined origin.

Key Elements

- As noted in this report Lenovo used EICC protocols of the CFSI and participates in that workgroup efforts.
- We have noted that as an electronics company, 3TG is necessary to the functionality to all our hardware products.
- This CMR provides the framework and steps to reduce the 3TG materials of not yet determined origin.
- Quality control checks for red flags are done on a best can do basis. However our primary response actions are to get all identify SOR's certified to be conflict free. We will continue to drive for high response rates on CMRT's and provided SOR lists. It is our intent that no supplier is considered conflict-free compliant until all the identified smelters become conflict-free compliant via CFSP or equivalent formally recognized programs.

Best Practices

- As noted, Lenovo is following the best practices of OECD and CFSI.
- Lenovo is publicly releasing the list and country of 3TG smelters in our supply chain in this report

Key Indicators

- Percentage of products containing 3TG.
 - ✓ Generally 100% of our hardware products contain 3TG.
- Number of 3TG products that have had their supply chains surveyed and Percentage of Smelters Identified.
 - ✓ Approximately 90% of overall procurement spend has been surveyed which therefore should cover most if not all of our 3TG products and smelters. We estimate, considering the numerous suppliers in our supply chain, their individual response rates and the scope/depth of their transparency, that we have reported 75% of the universe. However, given that there is a high correlation of the same smelters in many of our peer companies (and limited number of SOR's), we feel that that remaining 25% would report the same set of SOR's to a high degree.
 - ✓ It is also important to note that the number of Alleged SOR's has decreased from 104 to 34 SOR's from CY2014 to CY2015.
- Percentage of 3TG products with indeterminate 3TG.
 - ✓ Most of our products have some level of 3TG that has not yet been determined to be conflict free.
- Percentage of 3TG suppliers that have responded to a supply survey.
 - ✓ 100% of our suppliers requested to provide CMRT information have responded.
- Percentage of suppliers using material from CFS-verified smelters.
 - ✓ Virtually all of our suppliers are using material from a CFSP verified suppliers.
 - ✓ We estimate that 75% of the legitimate smelters in our supplier chain are CFSP compliant.
- Participation in the CFSP or equivalent program.
 - ✓ CFSI, CFSP, LBMA, RJC, TI-CMC or any other EICC recognized equivalent are the only programs we utilize and require 100% participation.

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10.3 Due Diligence

Key Elements and Best Practices

As noted in this CMR, Lenovo used the EICC Code of Conduct, OECD, CFSI, CMRT, CFSP policies and programs to conduct RCOI and Due Diligence and to drive towards complete conflict-free compliant operations.

Our response to the risk is continual improvement in CMRT response metrics and the percentage of conflict-free compliant smelters, refiners and the suppliers who use them.

Our supplier contract language included the following:

- Has received, read and understands the EICC code of conduct.
- Is compliant with the EICC, and will remain compliant with the EICC code of conduct.
- Subscribe to EICC Tool to input EICC Self-Assessment Questionnaire (SAQ) responses.
- Conduct a self-audit from an EICC-approved third party auditor an EICC-approved third party auditor.
- Provide a copy of the audit results to Lenovo.
- Implement a corrective action plan to ensure all non-conformances are resolved.
- Ensure Tier one Suppliers become compliant with the EICC.
- Ensure Tier one Suppliers conduct a self-audit from an EICC-approved third party auditor.
- Supplier shall implement a management system to continuously improve its EICC conformance and to address all non-conformances.
- Have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country.
- Participants shall exercise due diligence on the source and chain of custody of these minerals.
- Make their due diligence measures available to customers upon customer request.

Key Indicators

In our view the risk is non-CFS certification and risk response is drive to CFSP certification or to discontinuation. This will include supplier outreach as best possible.

- % of suppliers not in compliance with our policy and program efforts: 0%
- % of suppliers that have adopted a conflict minerals policy: 94%
- % of suppliers that have adopted a policy consistent with Lenovo: 94%
- % of suppliers undergoing remediation: 0% at this time
 - ✓ As noted above, the EICC strongly recognizes the difficulty for significantly downstream companies to truly remove a Smelter from the supply chain and that a positive working framework to be conflict-free compliant is the preferred route. However as noted earlier, we do anticipate taking some action to demand Smelter compliance as the initial steps to actual future removal attempts.
- % of smelters that are not participating: 25% (included Legitimate / Not Active)

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- Number of validated smelters that are not / are not sourcing from the covered countries.
 - ✓ Not sourcing from DRC/CC: 181
 - ✓ Sourcing from DRC/CC: 21
 - ✓ Rest are unknown and not disclosed by CFSP

10.4 In-Region Clean Minerals Trade

Lenovo primarily supported clean minerals trade through the following initiatives:

- Full compliance with Section 1502 of the Dodd-Frank Act even though:
 - ✓ Lenovo does not file reports with US SEC
 - ✓ A significant portion of our procurement is "retail" and not "contract to manufacture"
 - ✓ Requiring all suppliers to conduct CMRT/CFSP even though only 58% are required to file with the SEC
- Compliance OECD Due Diligence Guidance steps.
- Requiring smelters to be CFSP or other equivalent program to be conflict-free compliant.
- Member of EICC since 2006 and participation in CFSI work group to drive a common multi-industry and multi-stakeholder approach to our supply chains.
- Contractual requirements with our suppliers to follow the EICC Code of Conduct Compliance and requiring their suppliers to do so as well which includes conflict minerals policies and due diligence.

11.0 Country of Origin and the Smelter and Refiner Lists

11.1 Country of Origin

Dodd-Frank requires issuers to provide the efforts to determine the mine 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 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's and their locations via CMRT's from our supply chain
- Names and locations of Mines provided by the CMRT
- Verification of legitimate SOR's provided by the CFSI including associated and recognize industry bodies (e.g. LBMA, RJC, TI-CMC)
- Audits / Certification of the SOR's with the CFSP which provide 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 – DRC or adjoining countries (Covered Countries)
 - ✓ DRC – Democratic Republic of the Congo

The mine origin countries, identified by the CMRT's, are noted in the table below. The mine locations as identified by CFSP audits (as noted above), indicated 21 SOR's sourcing in the DRC/CC all of which are certified conflict-free compliant.

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Argentina	Germany	Portugal
Australia	Guyana	Russia
Belarus	India	Rwanda
Belgium	Indonesia	Sierra Leone
Bolivia	Japan	South Africa
Brazil	Korea	Spain
Canada	Malaysia	Switzerland
Chile	Mexico	Taiwan
China	Mozambique	Thailand
Colombia	Namibia	USA
Côte d'Ivoire	Nigeria	Vietnam
DRC	Peru	Zimbabwe
Estonia	Philippines	
Ethiopia	Poland	

10.2 Smelter and Refiner List ("The List")

Following is the List of SOR's identified in our supply chains. It does not include Alleged SOR not yet validated as legitimate.

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, along with all other EICC CFSI members to drive towards a precise list of SOR's and require them to be validated as conflict-free compliant via the CFSP.

The 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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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,

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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 EICC and/or GeSI, as well as their respective officers, directors, agents, employees, volunteers, representatives, contractors, successors, and assigns, resulting from 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.

Compliant Smelters

Metal	Smelter Name	Smelter Country
Tungsten	A.L.M.T. TUNGSTEN Corp.	JAPAN
Gold	Aida Chemical Industries Co., Ltd.	JAPAN
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.	GERMANY
Tin	Alpha	UNITED STATES
Gold	AngloGold Ashanti Córrego do Sítio Mineração	BRAZIL
Gold	Argor-Heraeus SA	SWITZERLAND
Gold	Asahi Pretec Corporation	JAPAN
Gold	Asaka Riken Co., Ltd.	JAPAN
Gold	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	TURKEY
Gold	Aurubis AG	GERMANY
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES
Gold	Boliden AB	SWEDEN
Gold	C. Hafner GmbH + Co. KG	GERMANY
Gold	CCR Refinery - Glencore Canada Corporation	CANADA
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	CHINA
Tungsten	Chaozhou Xianglu Tungsten Industry Co., Ltd.	CHINA
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.	CHINA
Gold	Chimet S.p.A.	ITALY
Tin	China Tin Group Co., Ltd.	CHINA
Tin	China Yunnan Tin Co Ltd.	CHINA
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA
Tantalum	Conghua Tantalum and Niobium Smeltry	CHINA
Tin	Cooperativa Metalurgica de Rondônia Ltda.	BRAZIL
Tin	CV Ayi Jaya	INDONESIA
Tin	CV Gita Pesona	INDONESIA
Tin	CV Serumpun Sebalai	INDONESIA

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Tin	CV United Smelting	INDONESIA
Tin	CV Venus Inti Perkasa	INDONESIA
Tantalum	D Block Metals, LLC	UNITED STATES
Gold	Doduco	GERMANY
Gold	Dowa	JAPAN
Tin	Dowa	JAPAN
Tantalum	Duoluoshan	CHINA
Gold	Eco-System Recycling Co., Ltd.	JAPAN
Gold	Elemetal Refining, LLC	UNITED STATES
Tin	Elmet S.L.U. (Metallo Group)	SPAIN
Tin	EM Vinto	BOLIVIA
Tantalum	Exotech Inc.	UNITED STATES
Tantalum	F&X Electro-Materials Ltd.	CHINA
Tin	Fenix Metals	POLAND
Gold	FSE Novosibirsk Refinery	RUSSIAN FEDERATION
Tungsten	Fujian Jinxin Tungsten Co., Ltd.	CHINA
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	CHINA
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA
Tungsten	Ganzhou Yatai Tungsten Co., Ltd.	CHINA
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA
Tantalum	Global Advanced Metals Aizu	JAPAN
Tantalum	Global Advanced Metals Boyertown	UNITED STATES
Tungsten	Global Tungsten & Powders Corp.	UNITED STATES
Tantalum	Guangdong Zhiyuan New Material Co., Ltd.	CHINA
Tantalum	Guizhou Zhenhua Xinyun Technology Ltd., Kaili branch	CHINA
Tantalum	H.C. Starck Co., Ltd.	THAILAND
Tungsten	H.C. Starck GmbH	GERMANY
Tantalum	H.C. Starck GmbH Goslar	GERMANY
Tantalum	H.C. Starck GmbH Laufenburg	GERMANY
Tantalum	H.C. Starck Hermsdorf GmbH	GERMANY
Tantalum	H.C. Starck Inc.	UNITED STATES
Tantalum	H.C. Starck Ltd.	JAPAN
Tungsten	H.C. Starck Smelting GmbH & Co.KG	GERMANY
Tantalum	H.C. Starck Smelting GmbH & Co.KG	GERMANY
Gold	Heimerle + Meule GmbH	GERMANY
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA
Gold	Heraeus Ltd. Hong Kong	HONG KONG
Gold	Heraeus Precious Metals GmbH & Co. KG	GERMANY

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Tantalum	Hi-Temp Specialty Metals, Inc.	UNITED STATES
Tungsten	Hunan Chenzhou Mining Group Co., Ltd.	CHINA
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.	CHINA
Tungsten	Hydrometallurg, JSC	RUSSIAN FEDERATION
Gold	Ishifuku Metal Industry Co., Ltd.	JAPAN
Gold	Istanbul Gold Refinery	TURKEY
Gold	Japan Mint	JAPAN
Tungsten	Japan New Metals Co., Ltd.	JAPAN
Gold	Jiangxi Copper Company Limited	CHINA
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA
Tin	Jiangxi Ketai Advanced Material Co., Ltd.	CHINA
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA
Tantalum	Jiujiang Tanbre Co., Ltd.	CHINA
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA
Gold	Johnson Matthey Inc.	UNITED STATES
Gold	Johnson Matthey Limited	CANADA
Gold	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	RUSSIAN FEDERATION
Gold	JSC Uralelectromed	RUSSIAN FEDERATION
Gold	JX Nippon Mining & Metals Co., Ltd.	JAPAN
Gold	Kazzinc	KAZAKHSTAN
Tantalum	KEMET Blue Metals	MEXICO
Tantalum	Kemet Blue Powder	UNITED STATES
Tungsten	Kennametal Huntsville	UNITED STATES
Gold	Kennecott Utah Copper LLC	UNITED STATES
Tantalum	King-Tan Tantalum Industry Ltd.	CHINA
Gold	Kojima Chemicals Co., Ltd.	JAPAN
Tantalum	LSM Brasil S.A.	BRAZIL
Gold	LS-NIKKO Copper Inc.	KOREA, REPUBLIC OF
Tin	Magnu's Minerais Metais e Ligas Ltda.	BRAZIL
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CHINA
Gold	Materion	UNITED STATES
Gold	Matsuda Sangyo Co., Ltd.	JAPAN
Tin	Melt Metais e Ligas S/A	BRAZIL
Tin	Metallic Resources, Inc.	UNITED STATES
Tin	Metallo-Chimique N.V.	BELGIUM
Tantalum	Metallurgical Products India Pvt., Ltd.	INDIA
Gold	Metalor Technologies (Hong Kong) Ltd.	CHINA
Gold	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE

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Gold	Metalor Technologies SA	SWITZERLAND
Gold	Metalor USA Refining Corporation	UNITED STATES
Gold	METALÚRGICA MET-MEX PEÑOLES, S.A. DE C.V	MEXICO
Tin	Mineração Taboca S.A.	BRAZIL
Tantalum	Mineração Taboca S.A.	BRAZIL
Tin	Minsur	Peru
Gold	Mitsubishi Materials Corporation	JAPAN
Tin	Mitsubishi Materials Corporation	JAPAN
Tantalum	Mitsui Mining & Smelting	JAPAN
Gold	Mitsui Mining and Smelting Co., Ltd.	JAPAN
Tantalum	Molycorp Silmet A.S.	ESTONIA
Gold	Moscow Special Alloys Processing Plant	RUSSIAN FEDERATION
Gold	Nadir Metal Rafineri San. Ve Tic. A.Ş.	TURKEY
Gold	Nihon Material Co., Ltd.	JAPAN
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA
Tungsten	Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC	VIET NAM
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND
Tin	O.M. Manufacturing Philippines, Inc.	PHILIPPINES
Gold	Ohura Precious Metal Industry Co., Ltd.	JAPAN
Gold	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	RUSSIAN FEDERATION
Tin	OMSA	BOLIVIA
Gold	PAMP SA	SWITZERLAND
Tantalum	Plansee SE Liezen	AUSTRIA
Tantalum	Plansee SE Reutte	AUSTRIA
Gold	Prioksky Plant of Non-Ferrous Metals	RUSSIAN FEDERATION
Gold	PT Aneka Tambang (Persero) Tbk	INDONESIA
Tin	PT Aries Kencana Sejahtera	INDONESIA
Tin	PT Artha Cipta Langgeng	INDONESIA
Tin	PT ATD Makmur Mandiri Jaya	INDONESIA
Tin	PT Babel Inti Perkasa	INDONESIA
Tin	PT Bangka Prima Tin	INDONESIA
Tin	PT Bangka Tin Industry	INDONESIA
Tin	PT Belitung Industri Sejahtera	INDONESIA
Tin	PT BilliTin Makmur Lestari	INDONESIA
Tin	PT Bukit Timah	INDONESIA
Tin	PT Cipta Persada Mulia	INDONESIA
Tin	PT DS Jaya Abadi	INDONESIA
Tin	PT Eunindo Usaha Mandiri	INDONESIA
Tin	PT Inti Stania Prima	INDONESIA

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Tin	PT Justindo	INDONESIA
Tin	PT Mitra Stania Prima	INDONESIA
Tin	PT Panca Mega Persada	INDONESIA
Tin	PT Prima Timah Utama	INDONESIA
Tin	PT REFINED BANGKA TIN	INDONESIA
Tin	PT Sariwiguna Binasentosa	INDONESIA
Tin	PT Sumber Jaya Indah	INDONESIA
Tin	PT Tambang Timah	INDONESIA
Tin	PT Timah	INDONESIA
Tin	PT Tinindo Inter Nusa	INDONESIA
Tin	PT Tommy Utama	INDONESIA
Tin	PT Wahana Perkit Jaya	INDONESIA
Gold	PX Précinox SA	SWITZERLAND
Tantalum	QuantumClean	UNITED STATES
Gold	Rand Refinery (Pty) Ltd.	SOUTH AFRICA
Gold	Republic Metals Corporation	UNITED STATES
Tin	Resind Indústria e Comércio Ltda.	BRAZIL
Tantalum	RFH Tantalum Smeltry Co., Ltd.	CHINA
Gold	Royal Canadian Mint	CANADA
Tin	Rui Da Hung	TAIWAN
Gold	Schone Edelmetaal B.V.	NETHERLANDS
Gold	SEMPSA Joyer?a Plater?a SA	SPAIN
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHINA
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CHINA
Gold	Singway Technology Co., Ltd.	TAIWAN
Tin	Smelter Not Listed	INDONESIA
Gold	SMM	JAPAN
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals	RUSSIAN FEDERATION
Tin	Soft Metais Ltda.	BRAZIL
Gold	Solar Applied Materials Technology Corp.	TAIWAN
Tantalum	Solikamsk Magnesium Works OAO	RUSSIAN FEDERATION
Tantalum	Taki Chemicals	JAPAN
Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN
Tungsten	Tejing (Vietnam) Tungsten Co., Ltd.	VIET NAM
Tantalum	Telex Metals	UNITED STATES
Tin	Thaisarco	THAILAND
Gold	The Refinery of Shandong Gold Mining Co., Ltd.	CHINA
Gold	Tokuriki Honten Co., Ltd.	JAPAN
Tantalum	Ulba	KAZAKHSTAN
Gold	Umicore Brasil Ltda.	BRAZIL

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Gold	Umicore Precious Metals Thailand	THAILAND
Gold	Umicore SA Business Unit Precious Metals Refining	BELGIUM
Gold	United Precious Metal Refining, Inc.	UNITED STATES
Gold	Valcambi SA	SWITZERLAND
Tungsten	Vietnam Youngsun Tungsten Industry Co., Ltd.	VIET NAM
Tin	VQB Mineral and Trading Group JSC	VIET NAM
Gold	Western Australian Mint trading as The Perth Mint	AUSTRALIA
Tin	White Solder Metalurgia e Minera??o Ltda.	BRAZIL
Tungsten	Wolfram Bergbau und H?tten AG	AUSTRIA
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA
Tungsten	Xiamen Tungsten Co., Ltd.	CHINA
Tungsten	Xinhai Rendan Shaoguan Tungsten Co., Ltd.	CHINA
Gold	YAMAMOTO PRECIOUS METAL CO., LTD.	JAPAN
Tantalum	Yichun Jin Yang Rare Metal Co., Ltd.	CHINA
Gold	Yokohama Metal Co., Ltd.	JAPAN
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA
Tantalum	Zhuzhou Cemented Carbide	CHINA
Gold	Zijin Mining Group Co., Ltd. Gold Refinery	CHINA

Active Smelters

Metal	Smelter Name	Smelter Country
Gold	Advanced Chemical Company	UNITED STATES
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN
Tin	An Vinh Joint Stock Mineral Processing Company	VIET NAM
Gold	Cendres + Métaux SA	SWITZERLAND
Gold	Daejin Indus Co., Ltd.	KOREA, REPUBLIC OF
Tungsten	Dayu Weiliang Tungsten Co., Ltd.	CHINA
Gold	Do Sung Corporation	KOREA, REPUBLIC OF
Tin	Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company	VIET NAM
Gold	Faggi Enrico S.p.A.	ITALY
Tin	Feinhütte Halsbrücke GmbH	GERMANY
Tungsten	Ganzhou Non-ferrous Metals Smelting Co., Ltd.	CHINA
Tin	GeJiu JinYe Mineral Company	CHINA
Tin	Gejiu Kai Meng Industry and Trade LLC	CHINA
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CHINA
Tungsten	Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji	CHINA
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA

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Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CHINA
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA
Tungsten	Kennametal Fallon	UNITED STATES
Gold	Metalor Technologies (Suzhou) Ltd.	CHINA
Gold	Navoi Mining and Metallurgical Combinat	UZBEKISTAN
Tin	Nghe Tinh Non-Ferrous Metals Joint Stock Company	VIET NAM
Tin	Phoenix Metal Ltd.	RWANDA
Tungsten	Pobedit, JSC	RUSSIAN FEDERATION
Gold	Samdok Metal	KOREA, REPUBLIC OF
Tungsten	Sanher Tungsten Vietnam Co., Ltd.	VIET NAM
Tin	Smelter not listed	UNITED KINGDOM
Gold	Torecom	KOREA, REPUBLIC OF
Tin	Tuyen Quang Non-Ferrous Metals Joint Stock Company	VIET NAM
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA

Outreach Smelters

Metal	Smelter Name	Smelter Country
Gold	Abington Reldan Metals, LLC	UNITED STATES
Gold	Accurate Refining Group	UNITED STATES
Gold	Caridad	MEXICO
Gold	Chugai Mining	JAPAN
Tin	CNMC (Guangxi) PGMA Co., Ltd.	CHINA
Gold	Daye Non-Ferrous Metals Mining Ltd.	CHINA
Tin	Estanho de Rondônia S.A.	BRAZIL
Gold	Gansu Seemine Material Hi-Tech Co., Ltd.	CHINA
Tungsten	Ganxian Shirui New Material Co., Ltd.	CHINA
Gold	Geib Refining Corporation	UNITED STATES
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CHINA
Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.	CHINA
Gold	Great Wall Precious Metals Co., LTD.	CHINA
Gold	Guangdong Jinding Gold Limited	CHINA
Gold	Guoda Safina High-Tech Environmental Refinery Co., Ltd.	CHINA
Gold	Hangzhou Fuchunjiang Smelting Co., Ltd.	CHINA
Tin	Huichang Jinshunda Tin Co., Ltd.	CHINA
Gold	Hunan Chenzhou Mining Group Co., Ltd.	CHINA

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Gold	Hwasung CJ Co., Ltd.	KOREA, REPUBLIC OF
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Company Limited	CHINA
Tungsten	Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	CHINA
Gold	Korea Metal Co., Ltd.	KOREA, REPUBLIC OF
Gold	Kyrgyzaltyn JSC	KYRGYZSTAN
Gold	L' azurde Company For Jewelry	SAUDI ARABIA
Gold	Lingbao Gold Company Limited	CHINA
Gold	Lingbao Jinyuan Tonghui Refinery Co., Ltd.	CHINA
Tin	Linwu Xianggui Smelter Co	CHINA
Gold	Luoyang Zijin Yinhui Gold Refinery Co., Ltd.	CHINA
Gold	Morris and Watson	NEW ZEALAND
Tin	Nankang Nanshan Tin Manufactory Co., Ltd.	CHINA
Gold	Penglai Penggang Gold Industry Co., Ltd.	CHINA
Tin	PT Pelat Timah Nusantara Tbk	INDONESIA
Gold	SAMWON METALS Corp.	KOREA, REPUBLIC OF
Gold	Shandong Tiancheng Biological Gold Industrial Co., Ltd.	CHINA
Gold	Tongling Nonferrous Metals Group Co., Ltd.	CHINA
Gold	Yunnan Copper Industry Co., Ltd.	CHINA

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