

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 around the world. 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 can be found on www.lenovo.com.

This Conflict Minerals Report of Lenovo Group Limited (Lenovo) for calendar year **2018** 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 Responsible Business Alliance (RBA) programs to conduct our responsible supply chain sourcing efforts for Reasonable Country of Origin Inquiry (RCOI) and Due Diligence (DD) efforts. The programs are internationally recognized and industry standard practices and act as the design framework of our conflict mineral program.

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

- <http://www.oecd.org/corporate/mne/mining.htm>
- www.responsiblebusiness.org

Our Specialized Disclosure was signed by our Director of Environmental, Sustainability & Compliance.

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2.0 Definition / Glossary

Definition

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

Glossary

- CMRT – Conflict Minerals Reporting Template
- CC – Covered Countries (also known as the adjoining countries of the DRC)
- DD – Due Diligence (Verify / Check)
- DRC – Democratic Republic of the Congo
- OECD – Organization for the Economic Cooperation and Development (www.oecd.org)
- RBA – Responsible Business Alliance (www.responsiblebusiness.org)
- RCOI – Responsible Country of Origin Inquiry (Survey / Ask)
- RMAP – Responsible Minerals Assurance Process (RMAP)
- RMI – Responsible Minerals Initiative (www.responsiblemineralsinitiative.org)
- SET – Smelter Engagement Team
- SOR – Smelter or Refiner
- 3TG – Tin, Tantalum, Tungsten & Gold
- CRT – Cobalt Reporting Template

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 the necessary functionality or production of such products. As such, conflict minerals are in all our hardware products and a 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 Responsible Business Alliance (RBA) Responsible Minerals Initiative (RMI) program for RCOI by using the Conflict Minerals Reporting Template (CMRT), which is widely used by industry. We also required our suppliers to use the CMRT's with their supplier bases.

In our RCOI, we surveyed 95% of our suppliers by spending amounts and achieved a 100% response rate. 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 10.0 of this report.

4.0 Conflict-Free Disclosure

Based on the RCOI and good faith efforts, Lenovo did have reason to believe that the conflict minerals had 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. 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 estimated that our supply chain is 89% conflict-free with all our products.

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Lenovo did not focus only on “product specific” supplier CMRT’s as to reduce the working number of smelters and improve our numbers. We believed it was more socially responsible to report all SOR in our supply chain, whether they actually provide content in our products or not, to further conduct DD as required.

5.0 OECD Due Diligence Standard Implementation

Lenovo adopts 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. For a significant portion of the parts we purchased, Lenovo had no direct influence on the parts, ingredients or components in them. Most 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. price and legal terms). For example, we did not direct the CPU, Storage, Memory, Planar, Battery and other electronic suppliers how to design, source and manufacture their components.

More specifically, Lenovo did not purchase raw or refined ore, and we did no direct purchasing in the DRC or CC. We did 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” Smelter’s or Refiners (SOR). Lenovo was in fact not only numerous supply chain tiers away from the mines of origin, but we were many tiers removed from SOR as well.

Therefore Lenovo by far is not a manufacturer or nor conducts “contract to manufacture” per the Dodd-Frank definition, and we were a final assembly/test operation and our suppliers acted more as retailers.

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.

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

- “The Guidance recommends that downstream companies identify, to the best of their efforts, and review the due diligence process of the smelters/refiners in their supply chain and assess whether they adhere to due diligence measures put forward in this Guidance. Downstream companies may participate in industry-wide schemes that assess smelters/refiners’ compliance with this Guidance and may draw on the information these schemes provide to help them fulfill the recommendations in this Guidance.

This distinction reflects the fact that internal control mechanisms based on tracing minerals in a company’s possession are generally unfeasible after smelting, with refined metals entering the consumer market as small parts of various components in end-products. By virtue of these practical difficulties, downstream companies should establish internal controls over their immediate suppliers and may coordinate efforts through industry-wide initiatives to build leverage over sub-suppliers, overcome practical challenges and effectively discharge the due diligence recommendations contained in this Guidance.”

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

- Responsible Minerals Assurance Process (RMAP) to help conduct DD and to establish business processes and protocols for SOR auditing and certification. Additionally this program provided country of origin information identified from actual audits.
- 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 Measures Taken

Following are the measures taken by Lenovo to comply with OECD, Dodd-Frank and RBA to prevent the use of conflict free minerals contributing to conflict.

6.1 Establish Strong Management Systems

- We have created a formal and public Conflict Minerals Policy which may be found at:
 - ✓ www3.lenovo.com/us/en/social_responsibility/Conflict_minerals_statement.pdf
- Lenovo had a formal organization structure for Sustainability and Conflict Minerals. There was a Chief Sustainability Executive, a Director of Corporate CSR, an autonomous Global Operations program team and Procurement for execution of conflict minerals programs, actions and reporting.
- We established within Lenovo a system of transparency and controls over the supply chain that allowed the identification of SOR of conflict minerals. First, we executed the RBA RMI programs for RCOI to identify the SOR. Second, we maintained all records on a computerized database. Third, through the use of the RBA reporting web application (RBA On-line), we had an electronic information sharing application with suppliers.
- We have taken several measures to establish and to continue to 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 had a Lenovo Supplier Advisory Council of our Top 20 suppliers who met with our senior executives semi-annually.

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- ✓ We established our expectations via formal communications, supplier RBA Agreements and our Lenovo policy. We established a new and comprehensive Supplier Code of Conduct and stipulated it in our contracts.
 - ✓ We directly validated supplier compliance with the RBA Code of Conduct, which includes conflict minerals DD efforts (Ethics #7). 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 (i.e. RBA On-Line). Corrective Action Plans were received for all audits and action closure status was reported monthly.
 - ✓ During 2018, we increased our demand on suppliers to discontinue the use of non-conformant smelters.
 - ✓ During 2018, we successfully integrated Lenovo Compal Future Center (LCFC) joint venture to Lenovo overall conflict mineral program.
 - ✓ In conjunction with RMI, Lenovo conducted a Cobalt Pilot run, and covered all main battery suppliers, 65% overall spend.
 - ✓ Lenovo invested personnel resource driving China smelters engagement by joining China SET team in RMI and SPOC (Single Point of Contact) for Cobalt SOR in Asia.
- 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, Human Rights, etc.) as well as a formal employee Code of Conduct covering 33 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 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 in our supplier chain using standard industry wide schemes as to whether the conflict minerals came from the DRC or adjoining countries.

The key resulting risks were then:

- Were the SOR actually located in the DRC or the surrounding countries?
- Had the SOR procured ore from those locations?
- Was any information provided by SOR 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 worldwide nature of supply chains, could the risk could be present with most SOR matter where they are located?
- Even though an SOR was reported in our supply chain, were we certain the minerals processes were actually in our products?

6.3 Design/Implement Response Strategy

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Therefore Lenovo's strategic objective to sufficiently respond to and to mitigate the risk was to understand all the SOR in our supply chain, whether they were actually in our supply chain or not and either get them certified or to 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
 - ✓ We continued the use of RMAP programs so that only conflict-free compliant smelters are used and leveraged the Smelter Engagement Team (SET) workgroup efforts on non-compliant and non-active SOR.
- Smelter / Refiner Discontinuation
 - ✓ Since hundreds of companies and many RBA/RMI members share many of the same SOR, 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 from supply chains. Demanding suppliers to remove non-compliant SOR ("negative efforts") provides low confidence that a smelter is actually removed from a supply chain and the removal stays effectuated. Lenovo recognizes positive efforts are better in the long-run for all involved parties.
- Internal Reporting & Awareness
 - ✓ Program Status: Reporting of annual CMRT survey status of kickoff and completion
 - ✓ Newsletters: Monthly key news, events, concerns and key links
 - ✓ Education: Semi-Annual education sessions for all employees
 - ✓ Monthly Metrics: Bi-Monthly program status and latest events
- 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 Resources on our webpages.
 - ✓ We also provided and will provide our due diligence measures to Customers and external stakeholders upon request.
 - ✓ Maintain our public policies on Conflict Minerals and Cobalt.
- 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.

Lenovo did not discriminate or limit action to only SOR that we believed were only in our products to improve our reported statistics. We took action on all reported SORs in our supply-chain whether their materials were truly in our products or not. We believed it was more socially responsible to report all SOR in our supply chain, regardless if they actually provided content in our products or not, to further conduct DD as required.

6.4 Carry Out Independent 3rd Party Audits

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As noted above, Lenovo will use the RMAP and the SET drive audits of smelter/refiners. Please see section 8.0 for the status of SOR supply chain and section 10.0 for the list of the actual SOR.

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](#).

7.0 Additional Measures to be Taken

Lenovo will take further steps in calendar year 2019 to improve our efforts and to continue our results. We have a goal of improving our overall conflict-free posture to 95% by end of CY2019. And we will

- Continue to increase positive outreach to non-compliant / non-active SOR to assist, educate and motivate them to become active and certified.
- Conduct more directive engagement with our suppliers who have non-compliant SOR.
- Developing tools to increase the accuracy and efficiency in our DD process.
- Integrate Lenovo joint ventures – Fujitsu (FCCL) into our company level CM program.
- Institutionalize Cobalt along with 3TG.
- Contribute volunteer as SPOC (Single Point of Contact) for cobalt refiner in Asia, which plays important roles in RMI, who builds relationship with eligible SORs (Smelters or Refiners) and liaise between the RMI program and SORs.
- Finally, in conjunction with RMI, Lenovo will determine additional minerals and materials to conduct Due Diligence.

8.0 Smelter and Refiner Key Indicators

From Lenovo's RCOI and DD efforts we have identified most of the SOR in our supply chain and determined how many are conflict-free compliant. The below table indicates our overall progress trend and CY2018 performance.

Lenovo Status	2013	2014	2015	2016	2017	2018
% Conflict Free	37%	50%	75%	80%	82%	89%

Conflict Mineral	Total SOR	Conformant	Active	Out-Reach In-Comms	% Compliant
Ta – Tantalum	40	40	0	0	100%
S – Tin	78	72	1	5	92%
W – Tungsten	41	39	0	2	95%
Au – Gold	122	100	3	19	82%
Overall	281	251	4	26	89%

Our progress in 2018 was limited due to two causes. First, we on-boarded several new suppliers who did not have robust conflict mineral DD programs. Second, several previously compliant SORs became non-conformant during the year.

Other Key Statistics

- Approximately 67% of our suppliers by spending were RBA / RMI members

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- We generally cover about 95% of our procurement spend in our RBA programs where suppliers DD programs are validated by independent 3rd 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. About 60% of our procurement spend acted in a Tier 2 role but may have acted in a Tier 1 role as well. About 30% of our procurement spend acted in a Tier 3 role. Simply put our conflict mineral DD efforts are executed deeper into our supply chain than Tier 1.
- Approximately 80% 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 Response Rate: 100%
- >95% of our suppliers use the CMRT with their suppliers, require them to be conflict-free and request SOR names
- # of Suppliers with Non-Compliant / Non-Active SOR: 10
- # of Non-Compliant / Non-Active SOR: 26
- Reporting: Bi-Monthly status reports were provided to the procurement teams.
- Education: All pertinent personnel educated semi-annually
- Newsletters: Updates were provided monthly as part of our standard RBA Code of Conduct Reporting

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 full 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.

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However, Lenovo did pass the UL EPEAT (Electronic Product Environmental Assessment Tool) review on conflict minerals sections (4.10.2.1 - 4.10.2.3) on public disclosure, in-region participation, and achieved 90% conflict free and active.

10.0 Country of Origin and the Smelter and Refiner Lists

10.1 Country of Origin

Dodd-Frank requires issuers to provide their 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 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's from our supply chain
- Names and locations of Mines provided by the CMRT
- 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 – DRC or adjoining countries (Covered Countries)
 - ✓ DRC – Democratic Republic of the Congo

10.2 Smelter and Refiner List ("The List")

Following is the List of SOR identified in our supply chains.

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, is to drive towards a precise list of SOR and require them to be validated as conflict-free compliant via the RMAP.

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.

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.

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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, 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.

Conformant Smelters

Metal	Smelter	Country
Gold	Aida Chemical Industries Co., Ltd.	JAPAN
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.	GERMANY
Gold	AngloGold Ashanti Corrego do Sitio Mineracao	BRAZIL
Gold	Argor-Heraeus S.A.	SWITZERLAND
Gold	Asahi Pretec Corp.	JAPAN
Gold	Asahi Refining Canada Ltd.	CANADA
Gold	Asahi Refining USA Inc.	UNITED STATES OF AMERICA
Gold	Asaka Riken Co., Ltd.	JAPAN
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
Gold	Chimet S.p.A.	ITALY
Gold	DODUCO Contacts and Refining GmbH	GERMANY
Gold	Dowa	JAPAN
Gold	Eco-System Recycling Co., Ltd.	JAPAN
Gold	Heimerle + Meule GmbH	GERMANY
Gold	Heraeus Metals Hong Kong Ltd.	CHINA
Gold	Heraeus Precious Metals GmbH & Co. KG	GERMANY
Gold	Ishifuku Metal Industry Co., Ltd.	JAPAN
Gold	Istanbul Gold Refinery	TURKEY
Gold	Japan Mint	JAPAN
Gold	Jiangxi Copper Co., Ltd.	CHINA
Gold	JSC Uralsktromed	RUSSIAN FEDERATION
Gold	JX Nippon Mining & Metals Co., Ltd.	JAPAN
Gold	Kazzinc	KAZAKHSTAN

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Gold	Kennecott Utah Copper LLC	UNITED STATES OF AMERICA
Gold	Kojima Chemicals Co., Ltd.	JAPAN
Gold	LS-NIKKO Copper Inc.	KOREA, REPUBLIC OF
Gold	Materion	UNITED STATES OF AMERICA
Gold	Matsuda Sangyo Co., Ltd.	JAPAN
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	MEXICO
Gold	Metalor Technologies (Hong Kong) Ltd.	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	Moscow Special Alloys Processing Plant	RUSSIAN FEDERATION
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	TURKEY
Gold	Nihon Material Co., Ltd.	JAPAN
Gold	Ohura Precious Metal Industry Co., Ltd.	JAPAN
Gold	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	RUSSIAN FEDERATION
Gold	OJSC Novosibirsk Refinery	RUSSIAN FEDERATION
Gold	PAMP S.A.	SWITZERLAND
Gold	Prioksky Plant of Non-Ferrous Metals	RUSSIAN FEDERATION
Gold	PT Aneka Tambang (Persero) Tbk	INDONESIA
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	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHINA
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals	RUSSIAN FEDERATION
Gold	Solar Applied Materials Technology Corp.	TAIWAN, PROVINCE OF CHINA
Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN
Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN
Gold	The Refinery of Shandong Gold Mining Co., Ltd.	CHINA
Gold	Tokuriki Honten Co., Ltd.	JAPAN
Gold	Umicore Brasil Ltda.	BRAZIL
Gold	Umicore Precious Metals Thailand	THAILAND
Gold	Umicore S.A. Business Unit Precious Metals Refining	BELGIUM
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
Gold	Yamakin Co., Ltd.	JAPAN
Gold	Yokohama Metal Co., Ltd.	JAPAN
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CHINA

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Gold	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN
Gold	Daejin Indus Co., Ltd.	KOREA, REPUBLIC OF
Gold	DSC (Do Sung Corporation)	KOREA, REPUBLIC OF
Gold	Geib Refining Corporation	UNITED STATES OF AMERICA
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CHINA
Gold	Kyrgyzaltyn JSC	KYRGYZSTAN
Gold	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE
Gold	Metalor Technologies (Suzhou) Ltd.	CHINA
Gold	Samduck Precious Metals	KOREA, REPUBLIC OF
Gold	Torecom	KOREA, REPUBLIC OF
Gold	Al Etihad Gold Refinery DMCC	UNITED ARAB EMIRATES
Gold	Cendres + Metaux S.A.	SWITZERLAND
Gold	Emirates Gold DMCC	UNITED ARAB EMIRATES
Gold	Korea Zinc Co., Ltd.	KOREA, REPUBLIC OF
Gold	MMTC-PAMP India Pvt., Ltd.	INDIA
Gold	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	AUSTRIA
Gold	SAXONIA Edelmetalle GmbH	GERMANY
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CHINA
Gold	Singway Technology Co., Ltd.	TAIWAN, PROVINCE OF CHINA
Gold	T.C.A S.p.A	ITALY
Gold	WIELAND Edelmetalle GmbH	GERMANY
Gold	Advanced Chemical Company	UNITED STATES OF AMERICA
Gold	HeeSung Metal Ltd.	KOREA, REPUBLIC OF
Gold	Marsam Metals	BRAZIL
Gold	SAAMP	FRANCE
Gold	Italpreziosi	ITALY
Gold	AU Traders and Refiners	SOUTH AFRICA
Gold	SungEel HiMetal Co., Ltd.	KOREA, REPUBLIC OF
Gold	Planta Recuperadora de Metales SpA	CHILE
Gold	Safimet S.p.A	ITALY
Gold	L'Orfebvre S.A.	ANDORRA
Gold	REMONDIS PMR B.V.	NETHERLANDS
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	CHINA
Tantalum	Exotech Inc.	UNITED STATES OF AMERICA
Tantalum	F&X Electro-Materials Ltd.	CHINA
Tantalum	Global Advanced Metals Aizu	JAPAN
Tantalum	Global Advanced Metals Boyertown	UNITED STATES OF AMERICA
Tantalum	Guangdong Zhiyuan New Material Co., Ltd.	CHINA
Tantalum	H.C. Starck Co., Ltd.	THAILAND
Tantalum	H.C. Starck Tantalum and Niobium GmbH	GERMANY

CONFLICT MINERALS REPORT OF LENOVO GROUP UNLIMITED

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

Tantalum	H.C. Starck Hermsdorf GmbH	GERMANY
Tantalum	H.C. Starck Inc.	UNITED STATES OF AMERICA
Tantalum	H.C. Starck Ltd.	JAPAN
Tantalum	H.C. Starck Smelting GmbH & Co. KG	GERMANY
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA
Tantalum	Jiujiang Tanbre Co., Ltd.	CHINA
Tantalum	KEMET Blue Powder	UNITED STATES OF AMERICA
Tantalum	LSM Brasil S.A.	BRAZIL
Tantalum	Metallurgical Products India Pvt., Ltd.	INDIA
Tantalum	Mineracao Taboca S.A.	BRAZIL
Tantalum	Mitsui Mining and Smelting Co., Ltd.	JAPAN
Tantalum	NPM Silmet AS	ESTONIA
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA
Tantalum	QuantumClean	UNITED STATES OF AMERICA
Tantalum	RFH Tantalum Smeltery Co., Ltd./Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINA
Tantalum	Solikamsk Magnesium Works OAO	RUSSIAN FEDERATION
Tantalum	Taki Chemical Co., Ltd.	JAPAN
Tantalum	Telex Metals	UNITED STATES OF AMERICA
Tantalum	Ulba Metallurgical Plant JSC	KAZAKHSTAN
Tantalum	Guangdong Rising Rare Metals-EO Materials Ltd.	CHINA
Tantalum	D Block Metals, LLC	UNITED STATES OF AMERICA
Tantalum	KEMET Blue Metals	MEXICO
Tantalum	FIR Metals & Resource Ltd.	CHINA
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA
Tantalum	Resind Industria e Comercio Ltda.	BRAZIL
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	CHINA
Tantalum	Asaka Riken Co., Ltd.	JAPAN
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA
Tantalum	Jiangxi Tuohong New Raw Material	CHINA
Tantalum	Jiujiang Janny New Material Co., Ltd.	CHINA
Tantalum	Power Resources Ltd.	MACEDONIA, THE FORMER YUGOSLAV REPUBLIC OF
Tin	Alpha	UNITED STATES OF AMERICA
Tin	China Tin Group Co., Ltd.	CHINA
Tin	PT Premium Tin Indonesia	INDONESIA
Tin	CV United Smelting	INDONESIA
Tin	Dowa	JAPAN
Tin	Metallo Spain S.L.U.	SPAIN
Tin	EM Vinto	BOLIVIA (PLURINATIONAL STATE OF)

CONFLICT MINERALS REPORT OF LENOVO GROUP UNLIMITED

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

Tin	Fenix Metals	POLAND
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA
Tin	Magnu's Minerai's Metais e Ligas Ltda.	BRAZIL
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA
Tin	Melt Metais e Ligas S.A.	BRAZIL
Tin	Metallo Belgium N.V.	BELGIUM
Tin	Mineracao Taboca S.A.	BRAZIL
Tin	Minsur	PERU
Tin	Mitsubishi Materials Corporation	JAPAN
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND
Tin	O.M. Manufacturing Philippines, Inc.	PHILIPPINES
Tin	Operaciones Metalurgical S.A.	BOLIVIA (PLURINATIONAL STATE OF)
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 Tin Industry	INDONESIA
Tin	PT Belitung Industri Sejahtera	INDONESIA
Tin	PT Bukit Timah	INDONESIA
Tin	PT DS Jaya Abadi	INDONESIA
Tin	PT Inti Stania Prima	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 Stanindo Inti Perkasa	INDONESIA
Tin	PT Timah Tbk Kundur	INDONESIA
Tin	PT Timah Tbk Mentok	INDONESIA
Tin	PT Tinindo Inter Nusa	INDONESIA
Tin	Rui Da Hung	TAIWAN, PROVINCE OF CHINA
Tin	Soft Metais Ltda.	BRAZIL
Tin	Thaisarco	THAILAND
Tin	White Solder Metalurgia e Mineracao Ltda.	BRAZIL
Tin	Yunnan Tin Company Limited	CHINA
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA
Tin	CV Ayi Jaya	INDONESIA
Tin	CV Gita Pesona	INDONESIA
Tin	CV Venus Inti Perkasa	INDONESIA
Tin	Gejiu Jinye Mineral Company	CHINA
Tin	Gejiu Kai Meng Industry and Trade LLC	CHINA

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Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CHINA
Tin	Metallic Resources, Inc.	UNITED STATES OF AMERICA
Tin	PT Bangka Prima Tin	INDONESIA
Tin	PT Karimun Mining	INDONESIA
Tin	PT Sumber Jaya Indah	INDONESIA
Tin	PT Tommy Utama	INDONESIA
Tin	Resind Industria e Comercio Ltda.	BRAZIL
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CHINA
Tin	CV Dua Sekawan	INDONESIA
Tin	PT Rajehan Ariq	INDONESIA
Tin	Gejiu Fengming Metallurgy Chemical Plant	CHINA
Tin	Guanyang Guida Nonferrous Metal Smelting Plant	CHINA
Tin	HuiChang Hill Tin Industry Co., Ltd.	CHINA
Tin	Huichang Jinshunda Tin Co., Ltd.	CHINA
Tin	Modeltech Sdn Bhd	MALAYSIA
Tin	Jiangxi New Nanshan Technology Ltd.	CHINA
Tin	PT Kijang Jaya Mandiri	INDONESIA
Tin	PT Tirus Putra Mandiri	INDONESIA
Tin	PT Menara Cipta Mulia	INDONESIA
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CHINA
Tin	PT Lautan Harmonis Sejahtera	INDONESIA
Tin	PT Sukses Inti Makmur	INDONESIA
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CHINA
Tin	PT Bangka Serumpun	INDONESIA
Tungsten	A.L.M.T. Corp.	JAPAN
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.	CHINA
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA
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	Global Tungsten & Powders Corp.	UNITED STATES OF AMERICA
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CHINA
Tungsten	Hunan Chenzhou Mining Co., Ltd.	CHINA
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.	CHINA
Tungsten	Japan New Metals Co., Ltd.	JAPAN
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA
Tungsten	Kennametal Huntsville	UNITED STATES OF AMERICA
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CHINA
Tungsten	Tejing (Vietnam) Tungsten Co., Ltd.	VIET NAM
Tungsten	Wolfram Bergbau und Hutten AG	AUSTRIA
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA

CONFLICT MINERALS REPORT OF LENOVO GROUP UNLIMITED

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Tungsten	Xiamen Tungsten Co., Ltd.	CHINA
Tungsten	Xinhai Rendan Shaoguan Tungsten Co., Ltd.	CHINA
Tungsten	H.C. Starck Tungsten GmbH	GERMANY
Tungsten	H.C. Starck Smelting GmbH & Co. KG	GERMANY
Tungsten	Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji	CHINA
Tungsten	Hydrometallurg, JSC	RUSSIAN FEDERATION
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA
Tungsten	Jiangxi Xinheng Tungsten Industry Co., Ltd.	CHINA
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA
Tungsten	Kennametal Fallon	UNITED STATES OF AMERICA
Tungsten	Niagara Refining LLC	UNITED STATES OF AMERICA
Tungsten	Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC	VIET NAM
Tungsten	ACL Metais Eireli	BRAZIL
Tungsten	Moliren Ltd.	RUSSIAN FEDERATION
Tungsten	Philippine Chuangxin Industrial Co., Inc.	PHILIPPINES
Tungsten	Unecha Refractory metals plant	RUSSIAN FEDERATION
Tungsten	Woltech Korea Co., Ltd.	KOREA, REPUBLIC OF
Tungsten	South-East Nonferrous Metal Company Limited of Hengyang City	CHINA
Tungsten	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	CHINA
Tungsten	Ganzhou Haichuang Tungsten Co., Ltd.	CHINA

Active Smelters

Metal	Smelter	Country
Gold	Chugai Mining	JAPAN
Gold	Bangalore Refinery	INDIA
Gold	KGHM Polska Miedz Spolka Akcyjna	POLAND
Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.	CHINA

Outreach / In-Communications Smelters

Metal	Smelter	Country
Gold	Refinery of Seemine Gold 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
Gold	Kazakhmys Smelting LLC	KAZAKHSTAN
Gold	Lingbao Gold Co., Ltd.	CHINA
Gold	Lingbao Jinyuan Tonghui Refinery Co., Ltd.	CHINA

CONFLICT MINERALS REPORT OF LENOVO GROUP UNLIMITED

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Gold	Luoyang Zijin Yinhui Gold Refinery Co., Ltd.	CHINA
Gold	Penglai Penggang Gold Industry Co., Ltd.	CHINA
Gold	Sabin Metal Corp.	UNITED STATES OF AMERICA
Gold	Shandong Tiancheng Biological Gold Industrial Co., Ltd.	CHINA
Gold	Tongling Nonferrous Metals Group Co., Ltd.	CHINA
Gold	Yunnan Copper Industry Co., Ltd.	CHINA
Tin	An Vinh Joint Stock Mineral Processing Company	VIET NAM
Tin	Estanho de Rondonia S.A.	BRAZIL
Tin	Nghe Tinh Non-Ferrous Metals Joint Stock Company	VIET NAM
Tin	Tuyen Quang Non-Ferrous Metals Joint Stock Company	VIET NAM
Tungsten	Jiangxi Dayu Longxintai Tungsten Co., Ltd.	CHINA
Gold	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	RUSSIAN FEDERATION
Gold	Caridad	MEXICO
Gold	HwaSeong CJ CO., LTD.	KOREA, REPUBLIC OF
Gold	L'azurde Company For Jewelry	SAUDI ARABIA
Gold	Samwon Metals Corp.	KOREA, REPUBLIC OF
Tungsten	Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	CHINA
Tin	Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company	VIET NAM

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UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549
FORM SD
SPECIALIZED DISCLOSURE REPORT



Lenovo Group Limited

Non-Applicable: Lenovo is not subject to the SEC Disclosure Requirement

State or other jurisdiction of incorporation or organization	Commission File Number File Number	IRS Employer US TIN 52-2449153
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23rd Floor, Lincoln House, Taikoo Place, 979 King's Road, Quarry Bay, Hong Kong

Address of principal executive offices

David Martin

919-294-2474

Name and telephone number, including area code, of the person to contact in connection with this report.

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2018.

Introduction

Lenovo is a US\$45 billion global Fortune 500 company and a leader in providing innovative consumer, commercial, and enterprise technology. We have three business groups at Lenovo. The Intelligent Devices Group (IDG) encompasses the PC and Smart Devices Business Group (PCSD), including PCs, tablets, augmented and virtual reality (AR/VR), and smart devices, and the Mobile Business Group (MBG) for smartphones. The second group is the Data Center Business Group (DCG), which includes servers, storage, networking, software and services, and thirdly the Lenovo Capital and Incubator Group (LCIG) which drives innovation through investments in startups. We have about 54,000 employees serving customers in more than 160 countries.

Lenovo is devoted to conduct socially, environmentally and ethically responsible 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 <https://www3.lenovo.com/us/en> as follows:

Company Overview

<https://www3.lenovo.com/us/en/lenovo/>

Conflict Minerals Policy

https://www3.lenovo.com/us/en/social_responsibility/Conflict_minerals_statement.pdf

Section 1 - Conflict Minerals Disclosures

In 2018, Lenovo utilized the following internationally recognized framework for our conflict minerals efforts:

- OECD Due Diligence Guidance for Responsible Supply Chains for Minerals from Conflict-Affected and High-Risk Areas

Lenovo also utilized industry standard protocols for responsible sourcing programs to help drive a common industry approach complementing hundreds of other major international company's efforts, to optimize for a more efficient and effective due diligence effort and to address key non-governmental organization's expectations. The protocols were:

- Responsible Business Alliance (RBA) Programs
 - ✓ Responsible Minerals Initiative (RMI)
 - ✓ Conflict Minerals Reporting Template (CMRT)
 - ✓ Responsible Minerals Assurance Process (RMAP)

Lenovo is committed to working towards sourcing only minerals from conflict-free compliant sources that are audited and verified by recognized independent bodies. Our efforts are summarized in this Specialized Disclosure and described in further detail in the Lenovo Conflict Minerals report.

We have concluded in good faith that during 2018 Lenovo:

- a) Had contracted to manufacture products in which conflict minerals were necessary to the functionality or production of such products and therefore conducted a Reasonable Country of Origin Inquiry (RCOI).
- b) Based on a comprehensive RCOI, Lenovo had not yet fully determined that "conflict minerals did not originate in the Democratic Republic of the Congo or an adjoining country" or "did come from recycled or scrap sources".
- c) Therefore, Lenovo conducted Due Diligence (DD) on the source and custody of our conflict minerals in our products and created a Conflict Minerals Report (CMR) with the required elements.
- d) It is important to note that Lenovo, while complying with the Dodd-Frank ruling across our operations, had exceeded the requirements thereof in three regards:
 - i. Lenovo is not subject to the ruling requirements and has not filed reports to the Security Exchange Commission in 2018 or any prior year.



- ii. While only less than half of our suppliers based on spending must legally comply with Dodd-Frank, we contractually required due diligence with suppliers and all their upstream suppliers.
- iii. We complied with the ruling even though most of Lenovo’s procurement operations are not “contract to manufacture” and are more purchase complete/final assembly and as such are not subject to the ruling. Much of the procurement spend was for industry standard parts not manufactured specifically for Lenovo. The majority of our procurement and supplier contracts do not specify materials, parts, ingredients, or components as we did not specify contract terms that directly related to manufacturing of the product. We only stipulated prices, warranties, legal and other standard terms.

Section 2 – Conflict Minerals Report

Lenovo’s Conflict Minerals Reports may be located at:

https://www3.lenovo.com/us/en/social_responsibility/Lenovo-Conflict-Minerals-Update

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SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

Lenovo Group Limited

Registrant

Signature

May 31, 2019

Date

Robert J. Taylor
Director Environmental, Sustainability & Compliance

Name and Title (Printed)

*** End of Document ***