

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



**Lenovo Group Limited**

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

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

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Address of principal executive offices

**David Martin**

**919-294-2474**

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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](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](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**

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Registrant

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Signature

**May 31, 2019**

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Date

**Robert J. Taylor**  
**Director Environmental, Sustainability & Compliance**

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Name and Title (Printed)

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