



June 2019

Lenovo Cobalt Policy and Statement

Lenovo is committed to responsible social, environmental and ethical sourcing in our supply chain and to protecting human rights in everything we do. We expect our supply chain to procure minerals and materials responsibly and to avoid all forms of slavery and forced labor, including child labor.

In particular, we support efforts to prevent human rights abuses associated with Cobalt mining.

We demonstrate this through our support of universal human rights principles, supplier contractual requirements, membership in key industry organizations and implementation of policies, programs and tools to identify, prevent, mitigate and address risks. Our specific actions include:

Support of Human Rights Principles

Lenovo supports the following principles:

- United Nations Universal Declaration of Human Rights (and is signatory to the UN Global Compact)
- International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- United States Federal Acquisition Requirements (FAR) on Combating Human Trafficking
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- Lenovo Human Rights Policy (https://www.lenovo.com/us/en/social_responsibility/human_rights_policy/)

Responsible Business Alliance

Lenovo has been a supporting member of the RBA since 2006. The RBA Code of Conduct directly addresses all forms of forced labor, child labor, humane treatment and safety. We implement the Code within our supply chain internally and externally and formally use all RBA programs, tools and methodologies for assessments and audits. All Lenovo manufacturing locations are assessed and audited by independent 3rd party and RBA approved auditors. Externally we similarly validate compliance of approximately 95% by procurement spend including critical Tier 2 and 3 suppliers. Our supplier responsible sourcing requirements are contractually executed in our legal agreements, purchase orders and supplier code of conduct, which directly addresses Human Rights, Conflict Minerals, and Supply Chain Working Conditions. (https://www.lenovo.com/us/en/pdf/social_responsibility/Supplier_Code_of_Conduct.pdf)

Responsible Minerals Initiative (RMI) and Cobalt

As we have fully supported all industry and government efforts on Conflict Minerals of Tin, Tantalum, Tungsten and Gold (3TG) in the Democratic Republic of the Congo and the covered countries, we will fully support and utilize associated RMI programs and tools for cobalt. The RMI currently working closely with multiple Cobalt stakeholders and is developing the same programs as 3TG. Specifically the RMI has:

- Has formally defined “cobalt smelters or refiners”, identified about 100 entities.
- Established due diligence practices and provided a roadmap for us to manage cobalt risks. The OECD Guidance 5-step approach can equally be applied to cobalt.
- Developed initial tools to implement this due diligence including publish Cobalt Reporting Template, Cobalt Refiner List and Risk Mitigation Protocol.

Looking forward in 2019, RMI will continue to:

- Focus on implementation and upstream risk management
- Outreach to both fine and crude refiners
- Develop risk Mitigation Protocol and applications in different pilot projects.
- Support in-region delegation visit
- Leverage new technology such as block chain, also increase the interest to use block chain and revise the block chain guidelines.

In calendar year 2018, Lenovo has taken the same steps to mitigate human rights risks in our cobalt supply chain as for 3TG, specifically we have:

- Implemented Due Diligence Framework
 - ✓ Followed same OECD 5-step guidelines as for Conflict Minerals

- ✓ Launched the Cobalt Reporting Template (CRT) to collect cobalt refiners in battery supply chain, covering suppliers, which represented about 65% percent of our procurement spend.
- ✓ Identified 11 smelters and provided the information to the RMI.
- ✓ Reported on cobalt due diligence according to OECD in 2018
- Participated in Industry Initiatives
 - ✓ Active member in the Responsible Minerals Initiative (RMI) to develop standard due diligence tools and audit protocols
- Engaged with Cobalt Refiners
 - ✓ Worked directly with refiners in our supply chain to undergo RMI audits that assure responsible sourcing of cobalt

Lenovo is a participating member of the RMI cobalt efforts, and approximately 65% of our suppliers by procurement spend are also members of the RMI. In 2020, we plan to fully integrate our Cobalt due diligence efforts identical to the mature 3TG programs and will:

- Reissue the cobalt sourcing survey to all suppliers with cobalt content including battery suppliers and out-sourced manufacturers
- Continue to active engagement with RMI Cobalt work group and address any identified risks
- Encourage our upstream suppliers to trace back their supply chains to the refiners and ask them to conduct third-party audits if they have not done so
- Reach out to suppliers and cobalt refiners in Lenovo supply chain, train and educate them on cobalt due diligence, understand the potential risks and how to follow the OECD Guidance

Sincerely,



Global Supply Chain Sustainability Manager





联想钴矿政策和声明

联想致力于在我们的供应链进行对社会、环境和道德负责的采购，并在我们所做的每一件事中保护人权。我们期望我们的供应链负责地采购矿物和材料，避免一切形式的奴役和强迫劳动，包括童工。

我们尤其支持在防止与钴矿开采有关的侵犯人权的努力。

我们支持普遍的人权原则、供应商合同要求、成为关键行业组织的成员、执行政策、项目和工具来识别、预防、减轻和处理风险来证明。我们的具体行动包括：

支持人权原则

联想支持以下原则：

- 联合国世界人权宣言(是联合国全球契约的签署者)
- 国际劳工组织(ILO)关于基本原则和工作权利的宣言
- 美国打击人口贩运的联邦采购要求(FAR)
- 经合组织对受冲突影响和高风险地区负责任的矿产供应链的尽职调查指导
- 联想人权政策(https://www.lenovo.com/us/en/social_responsibility/human_rights_policy/)

负责任的商业联盟

自 2006 年以来，联想一直是负责任商业联盟成员。负责任商业联盟的行为准则直接涉及所有形式的强迫劳动、童工、人道待遇和安全。我们在供应链内部和外部都遵循该行为准则，并正式使用所有 RBA 项目、工具和方法进行评估和审计。所有联想制造基地都由独立的第三方和 RBA 批准的审核公司进行评估和审计。在外部，我们同样基于采购费用(包括关键的 2 级和 3 级供应商)验证大约占我们总采购费用 95% 的供应商的合规性。我们的供应商负责任的采购要求是在我们的法律协议、采购订单和供应商行为准则中依据合同执行的，直接涉及到人权、冲突矿物和供应链工作条件。

(https://www.lenovo.com/us/en/pdf/social_responsibility/Supplier_Code_of_Conduct.pdf)

负责任矿物倡议(RMI)和钴

由于我们充分支持刚果民主共和国和上述国家在冲突矿物锡、钽、钨和金(3TG)方面的所有工业和政府努力，我们将充分支持和利用与钴矿相关的 RMI 项目和工具。RMI 目前正与多个钴矿项目的利益相关者密切合作，并正在开发与 3TG 相同的项目。具体来说，RMI 已经：

- 正式定义了“钴矿冶炼厂或精炼厂”，确定了大约 100 家实体。
- 建立尽职调查实践，为我们管理钴矿风险提供了路线图。经合组织的 5 步指导法同样适用于钴矿。
- 开发了初始工具来实施这项尽职调查，包括发布钴报告模板、钴精炼商列表和风险缓解协议。

展望 2019 年，RMI 将继续：

- 专注于实施和上游风险管理
- 向精炼厂和粗炼厂沟通
- 在不同的试点项目中开发风险缓解方案 and 应用程序。
- 支持区域内代表团访问
- 利用区块链等新技术，增加使用区块链的兴趣，修改区块链指南。

在 2018 年，联想采取了与 3TG 相同的步骤来降低钴供应链中的人权风险，具体来说，我们有：

- 实施尽职调查
 - ✓ 遵循经合组织五步指南对于冲突矿物的知道
 - ✓ 启动钴矿冶炼厂的报告收集，覆盖电池供应商，大约占比 65% 的联想采购总数。
 - ✓ 识别了 11 家冶炼厂并向 RMI 提供了相关信息
 - ✓ 于 2018 年，报告了根据经合组织指导的钴矿尽职调查
- 参与行业活动
 - ✓ 负责人矿产项目的活跃成员，参与开发标准的尽职调查工具和审计要求

- 与钴冶炼厂密切沟通
 - ✓ 直接我们供应链中的钴冶炼厂沟通，从而接受 RMI 审计以确保钴矿的负责任采购

联想是负责任矿产中钴矿项目的参与成员之一，我们采购的供应商中大约 65%也是 RMI 的成员。到 2020 年，我们计划充分整合我们已经成熟的 3TG 项目以及钴矿的尽职调查工作，并将：

- 重新要求所有含钴的供应商(包括电池供应商和外包制造商)来发布钴矿的来源调查
- 继续与负责人矿产的钴矿工作组积极合作，应对任何已发现的风险
- 鼓励我们的上游供应商追溯其供应链到冶炼厂，并要求他们进行第三方审计
- 联系联想供应链中的供应商和冶炼厂，对他们进行钴尽职调查方面的培训和教育，了解潜在的风险以及如何遵循经合组织的指导



全球供应链可持续发展经理

