

LENOVO GLOBAL GIFT, ENTERTAINMENT, CORPORATE HOSPITALITY AND TRAVEL POLICY

Effective Date: May 16, 2016

Contact Lenovo's Ethics and Compliance Office (ECO), ethics@lenovo.com, if you have any questions regarding this policy.

Who does this policy apply to?

This policy applies to all Lenovo employees (including full-time, part-time, temporary, and supplemental), consultants, and contractors. "Lenovo" includes the Lenovo Group Limited and all of its subsidiaries, present and future. Throughout this policy, the term "Lenovo representative" means anyone who must follow this policy.

Statement of Policy

We all have a responsibility to act with trust and integrity, to follow the law wherever we do business, and to make sure we spend Lenovo's money wisely. Lenovo's Code of Conduct (the Code) states we should never offer, give or accept gifts, entertainment, corporate hospitality, or travel, also known as business courtesies, that are or could appear to be bribes, or that could appear to improperly influence our business partners' or our objectivity in making business decisions. This Global Gift, Entertainment, Corporate Hospitality and Travel Policy provides rules to ensure you follow applicable laws and the Code of Conduct whenever you offer, give or accept business courtesies while working for Lenovo.

Lenovo is subject to anti-corruption laws that require us to follow special rules, described below, when providing any business courtesies to [Government Officials](#). Check these special rules before you act.

More restrictive rules may apply to business courtesies depending on the country, organization, Lenovo business unit or functional group, or your Lenovo manager. You are responsible for following all such rules for providing business courtesies. [Lenovo country-specific policies](#) for providing business courtesies in China and certain other countries are set forth in Lenovo's Gift, Entertainment, Corporate Hospitality and Travel Country Table. If a specific country is not listed, the rules in this Lenovo Global Gift, Entertainment, Corporate Hospitality and Travel policy apply.

This policy does not apply to business courtesies that are provided internally. These are governed by Lenovo's Travel Policies.

Failure to comply with this policy may result in civil and criminal penalties for Lenovo and the individuals involved, and is grounds for disciplinary action, including termination.

What Activities Are Covered by this Policy?

This policy applies to all gifts, entertainment, corporate hospitality and travel, also referred to as "business courtesies," offered, given, or accepted between Lenovo representatives and third parties with whom Lenovo representatives interact, including customers, channel partners,

suppliers, vendors and Government Officials.

- **What are Gifts?** Gifts include anything of value offered, given, or accepted by a Lenovo representative.

Examples of gifts:

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| ● Cash or cash equivalents | ● Jewelry | ● Promotional items |
| ● Gift Cards | ● Redeemable vouchers | ● Loans |
| ● Transportation or fuel | ● Tobacco or alcohol | ● Tickets to sports, music, or cultural events |
| ● Vacations and weekend excursions | ● Free or discounted Lenovo or other company products | ● Free or discounted use of Lenovo facilities and equipment |

- **What is Entertainment?** Entertainment is any activity with participation by both a Lenovo representative and a third party (such as a current or prospective customer, channel partner, supplier, or Government Official). If the activity or meal does not include both a Lenovo representative and a third party, it is a gift, and the rules in this policy relating to providing or accepting gifts should apply.

Examples of Entertainment

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| ● Meals | ● Concerts | ● Sporting Events |
| ● Vacations and leisure travel | ● Recreational activities like golf and tennis | ● Spa outings |

- **What is Corporate Hospitality and Travel?** Corporate hospitality and travel include domestic or international trips provided by Lenovo to any third party or travel accepted by any Lenovo employee, contractor, or consultant while doing work for Lenovo, where the travel serves a legitimate business purpose above and beyond developing relationships. When Lenovo is providing the corporate hospitality or travel, usually the legitimate business purpose will be to demonstrate or promote a specific Lenovo product or service. When evaluating corporate hospitality and travel under this policy, include all expenses that will be provided or accepted, such as logistics support, airfare, ground transportation, accommodation or lodging, meals, per diems, any incidental expenses such as tips, and entertainment or leisure activities that take place during the travel. If there is no legitimate business purpose above and beyond developing relationships (for example, a trip to the Super Bowl), then the corporate hospitality and is a gift or entertainment (depending on whether a Lenovo representative participates), and the rules in this policy relating to gifts or entertainment should apply.

Examples of Corporate Hospitality and Travel

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| <ul style="list-style-type: none"> • Study Tours | <ul style="list-style-type: none"> • Channel Partner Conferences | <ul style="list-style-type: none"> • Factory Tours |
| <ul style="list-style-type: none"> • Training Trips | <ul style="list-style-type: none"> • Speaking engagements | <ul style="list-style-type: none"> • Industry conferences |
| <ul style="list-style-type: none"> • Industry Events (Consumer Electronics Show, Mobile World Congress, TechWorld) | <ul style="list-style-type: none"> • Sponsored customer or supplier visits | <ul style="list-style-type: none"> • Trips for members of the media to attend product launches |

Who is a Government Official?

This policy provides specific rules for providing business courtesies to Government Officials, to ensure we comply with the anti-bribery laws that apply in many countries where we do business. The definition of Government Official under anti-bribery laws tends to be broad and includes employees of government-owned and government controlled companies that are Lenovo's customers.

Government Officials include:

- Employees of any level of government
 - Examples:
 - police officers
 - members of the military
 - customs inspectors
 - tax auditors
 - employees of government consumer safety organizations
 - appointees to government boards
- Employees of government-owned or controlled businesses or institutions
 - Examples:
 - state-owned oil and gas companies (ex. Petrobras or Statoil)
 - government-owned telecom companies (ex. China Mobile)
 - government hospitals
 - government-owned media companies or newspapers (ex. Beijing Daily)
 - Public schools, universities, or research institutes
- Representatives of public international organizations, including the United Nations International Olympic Committee, and the World Bank
- Employees, representatives or advisors of a political party
- Candidates for political office
- Members of royal families
- Close relatives (including parents, sibling, spouse, or child) or the significant other of any of the above

For more information on interactions with Government Officials, review Lenovo's [Anti-Corruption/Bribery Policy](#) or contact the ECO or the Legal Department.

Rules for All Gifts, Entertainment, Corporate Hospitality and Travel

Anytime we offer, provide or receive any business courtesies, we must follow these rules:

- **Special rules when dealing with Government Officials** Review the specific rules in this policy on dealing with Government Officials and check with your local Legal Department representative before giving any business courtesies to Government Officials.
- **No Cash Gifts** We may never provide or accept cash or cash equivalents, such as gift cards, redeemable vouchers, gift certificates, or loans.
- **Customary, Moderate, Infrequent and Legitimate** Any business courtesies we provide or accept must be customary and appropriate in the country where they are offered. The appropriateness of a business courtesy will depend on regional differences in business customs but also on the business situation and the position of the people involved. If you have questions about whether a business courtesy is customary and appropriate, contact the ECO or the Legal Department for guidance. Business courtesies must also be of moderate value, as defined below, infrequent and must serve a legitimate business purpose.
- **No Bribes** It is never acceptable to offer, provide, solicit, or accept bribes, kickbacks or anything of tangible or intangible value in order to improperly obtain or retain any business or other advantage (such as winning business, securing favorable tax treatment, or receiving a competitor's bid information), or to cause the recipient to act improperly or unlawfully. We must always make sure we avoid the appearance of corruption or a conflict of interest when offering, giving, or accepting business courtesies.
- **Follow the Law and Our Business Partners' Policies** You are responsible for ensuring that all business courtesies provided or accepted do not directly or indirectly violate any laws, rules, or our business partners' or Lenovo's policies.
- **Business Courtesies For Relatives, Spouses or Significant Others** No business courtesies, including Lenovo products provided for demonstration or promotional purposes, may be provided to the spouse, family member, significant other or any close relative of Commercial Third Parties or Government Officials. Your spouse, family member, or significant other or any other close relative may not accept gifts from a third party that does business with Lenovo. The only exception is the infrequent attendance of an immediate family member, spouse or significant other of a Commercial Third Party or Lenovo employee at Commercial events where it would be customary for a family member, spouse or significant other to attend.
- **Follow Processes when Providing Free or Heavily Discounted Lenovo Products** Giving away Lenovo products at no charge (meaning that the products are not subsequently purchased or returned and are given as an outright gift) or at heavily discounted prices creates a bribery and corruption risk for Lenovo. Lenovo has different rules, discussed below, depending on whether the Lenovo product is provided to a commercial third party or to a Government Official.
- **Accurate Reporting** All business courtesies provided by any Lenovo representative must be purchased with Lenovo funds, must be supported by receipts and appropriate backup documentation, and be properly recorded in Lenovo's books and records. All business courtesies must comply with this policy as well as the requirements set forth in the Lenovo Travel Policy that applies to your country or business unit.

- **Approval for Business Courtesies During Active Bid Process or Pending Tender**
The ECO and the Law Department must approve any business courtesies involving a third party involved in a pending competitive bid or tender process with Lenovo.
- **Third Party Vendors Arranging Business Courtesies must Comply with this Policy** All third party vendors that assist Lenovo with providing business courtesies, such as travel agencies, public relations firms, or marketing firms, must comply with this policy and with Lenovo's travel and reimbursement policies. All third party vendors must provide invoices that list all the specifics of an event including the name of travelers or attendees to events as well as their titles and organizations, the venue, details about the business courtesies provided, and the monetary value of each part of the event.
- **No Inappropriate Business Courtesies** We may not provide or accept any business courtesies that are illegal, or inconsistent with Lenovo's brand and company values so that offering or accepting the courtesy would reflect poorly on Lenovo if the details were made public. We may not provide or accept sexually-oriented entertainment.
- **Approval for Exceptions to Policy** Any exceptions to this policy must be approved by Lenovo's Chief Ethics and Compliance Officer.

Policy on Offering, Giving, and Accepting Gifts

- **Commercial (non-governmental) Third Parties: Offering, Giving or Accepting Gifts (SEE BELOW FOR RULES ON PROVIDING GIFTS TO GOVERNMENT OFFICIALS)**
 - Always consider whether the value, frequency or timing of the gift you are offering, giving, or accepting creates the appearance of impropriety.
 - You may not provide or accept more than two gifts from any commercial third party (including customers, channel partners, suppliers, or vendors) in a twelve month period.
 - You may provide or accept gifts worth US \$50 or less without approval from your direct manager, unless your manager, country, or business function has more restrictive rules.
 - You may provide or accept gifts above US \$50 up to US \$200 with approval from your direct manager.
 - Gifts valued above US \$200 raise the risk of appearing improper, creating a conflict of interest, and even looking like a bribe. gifts valued above US \$200 may not be provided or accepted unless approved by your direct manager and a manager in your direct reporting line at the level of regional or country General Manager or Business Unit Vice-President or higher.
 - Contact the ECO (ethics@lenovo.com) if you believe there are special circumstances involving gift-giving not addressed by this policy.

- **Commercial Third Parties: Providing Free or Heavily Discounted Lenovo Products**
 - Any free or heavily discounted Lenovo products provided to commercial customers or business partners (not Government Officials) must be provided for legitimate business purposes such as for promotion or demonstration of a Lenovo product or service. You must get the appropriate approvals designated by your region, country or business unit before providing any free or discounted Lenovo products to a commercial third party. Each Lenovo department must keep appropriate business records of the products provided to any third parties.

- **Government Officials: Offering, Giving or Accepting Gifts**
 - In order to comply with international anti-corruption laws and standards, Lenovo discourages offering gifts to Government Officials. In most cases, before offering any gifts to Government Officials, you must obtain approval from the ECO and the General Counsel for your region. However, in limited cases, you may provide gifts to Government Officials without pre-approval from the ECO or the General Counsel for your region **if all of the following circumstances are met**:
 1. You have consulted your Geo Legal Department to ensure that the gift is permitted by applicable law.
 2. Your manager has provided written pre-approval.
 3. The item is worth no more than US \$50.
 4. The item is not provided with the intent to improperly obtain or retain any business or other advantage (such as winning business, securing favorable tax treatment or receiving a competitor's bid information), or to cause the recipient to act improperly or unlawfully.
 5. The total value of gifts provided to an individual recipient has not exceeded US \$75 in one year. Check with the ECO, or Government Relations to find out how many business courtesies have been provided to the Official to whom you would like to provide a gift.
 6. The gift is permitted by the recipient's organization.
 7. The Government Official has not received more than four offerings of entertainment and gifts from Lenovo in the last 12 months (including all business courtesies, with each gift or entertainment offering counting as one offering).
 8. The gift is provided openly and is not concealed from either Lenovo or the Government Official's organization.
 9. The gift complies with the general rules included in this policy, and is not cash or a cash equivalent.
 10. The gift is not prohibited by any country, business or function specific gift policy.
 - Any gifts provided to Government Officials must be reported to Government

Relations and the ECO, including a description of the gift, the monetary value of the gift, the date the gift was provided, the name, title, and organization of the recipient, and the business purpose of the gift.

- Any gifts to Government Officials that do not fit into the pre-approval guidelines provided above **MUST** be approved in advance, in writing, by the ECO and General Counsel for your region. If you propose to provide a gift that requires pre-approval by the ECO, you must contact the ECO far enough in advance to allow the ECO to review the legality of the proposed gift. You can also submit your request through this [form](#).
- **Government Officials: Providing Free or Heavily Discounted Products to Government Officials**
 - Lenovo products provided to Government Officials are subject to the same rules as gifts to Government Officials, plus the following additional restrictions:
 - Lenovo products may be provided to Government Officials only for the purpose of promoting, explaining or demonstrating the capability of the products.
 - You may never give Lenovo products worth more than US \$50 as gifts to Government Officials unless you have obtained pre-approval in writing from your direct manager, the ECO, and the General Counsel for your region. If you propose to provide a Lenovo product that requires the pre-approval by the ECO, you must contact the ECO far enough in advance to allow the ECO to review the proposed action. You can also submit your request through this [form](#).
 - The Lenovo Department providing the products must keep a record of all products provided, and provide this information to Government Relations and the ECO, including a description of the product, the monetary value of the product, the date the product was provided, the name, title, and organization of the recipient, and the business purpose of providing the product.
 - Any Government Official receiving Lenovo products must acknowledge the following in writing:
 1. The products are being provided for promotion and demonstration purposes.
 2. The products are being provided to the Government Entity and not to an individual Government Official or employee of that entity.
 3. By accepting the product, the recipient may receive a request to complete a technical review or survey about the product.
 4. The recipient agrees to return the product to Lenovo within six months of delivery if return is requested.

Policy on Lenovo-Sponsored Raffles or Lucky Draw Events For All Third Parties

- Lenovo products or other gifts may be provided in bonafide random drawings, raffles, or lucky draws if the drawing is not designed to reward any specific third party including customers, suppliers, business partners or Government Officials; the drawing is objectively managed; and the drawing is approved in advance by the ECO and the General Counsel of your region. This restriction does not apply to internal Lenovo random drawings designed to award products or other gifts to Lenovo employees or contractors.
 - Check with your local Legal Department on local rules on raffles, contests and lucky draws before proceeding. In China, Lenovo may not provide products or other gifts in any random drawings, raffles, or lucky draws that exceed 5,000 RMB in value.

Policy on Offering, Providing, and Accepting Entertainment

- **Commercial (Non-governmental) Third Parties: Offering, Providing, and Accepting Entertainment**
 - entertainment must be moderate, infrequent, consistent with Lenovo's values and appropriate in the context of the business. As the value of the entertainment provided increases, so does the risk that providing the entertainment creates an appearance of impropriety.
 - Providing food and non-alcoholic beverages to commercial third parties visiting Lenovo facilities valued up to US \$20 per person, while the Commercial Third Parties are on Lenovo's premises, is permitted, and does not count as entertainment under this policy.
 - Other than above, your direct manager must pre-approve any entertainment expenses involving commercial third parties that you plan to incur or wish to participate in. Additionally, any entertainment provided or accepted over US \$500 per person must be approved in writing by a manager in your direct reporting line at the level of regional or country General Manager or Business Unit Vice-President or higher.
 - Any expenses associated with entertainment provided by Lenovo must be submitted in compliance with the requirements set out in the Lenovo Travel Policy for your region. In particular:
 - When Lenovo is providing the entertainment, and multiple employees or contractors are present, the most senior Lenovo employee is responsible for making the corresponding payment and submitting the expense report to his or her direct manager for approval.
 - The expense report for the event must provide:
 - the specific business purpose of the meal
 - the name(s) and title(s) of all attendees
 - the company or organizational affiliation of all attendees
 - the name and location where the event took place
 - the exact amount and date of the expense

- **Government Officials: Offering, Providing, and Accepting Entertainment**

- Providing food and non-alcoholic beverages to Government Officials visiting Lenovo facilities valued up to US \$20 or less per person, while Government Officials are on Lenovo's premises is permitted and does not count as entertainment under this policy.
- In order to comply with international anti-corruption laws and standards, Lenovo discourages providing entertainment to Government Officials. In most cases, you must obtain pre-approval from the ECO and the General Counsel of your region before offering, giving or accepting entertainment involving Government Officials. In limited cases, you may provide entertainment to Government Officials without pre-approval from the ECO and the General Counsel of your region **if all of the following circumstances are met:**

1. You have consulted your local Legal Department to ensure that the entertainment is permitted by applicable law and by the recipient's organization.
2. The entertainment is approved by your direct manager.
3. The entertainment consists of meals and/or drinks only.
4. The cost of meals and drinks does not exceed US \$50 per person. You must follow the per attendee country/market guidelines provided in the Lenovo Global Travel Policy for your region if it provides lower per person limits.
5. The entertainment is not provided with the intent to improperly obtain or retain any business or other advantage (such as winning business, securing favorable tax treatment or receiving a competitor's bid information), or to cause the recipient to act improperly or unlawfully.
6. The Government Official has not received more than four offerings of entertainment and gifts from Lenovo in the last 12 months (including all gifts and entertainment, with each gift or entertainment offering counting as one offering). Check with your manager, the ECO, or Government Relations to find out how many business courtesies have been provided to the official to whom you would like to provide entertainment.
7. The entertainment is provided openly and is not concealed from either Lenovo or the Government Official's organization.
8. You record the purpose of the entertainment in your expense reports, and identify each Government Official, including the Official's full name, job title or function (whichever is known), and full name of organization.
9. The entertainment is not prohibited by any country, business or function specific entertainment or gift policy.

- All entertainment for Government Officials that does not fit into the guidelines provided above must be pre-approved in writing by the ECO, General Counsel for your region, and the manager in your direct reporting line at the level or

regional or country General Manager or Business Unit Vice-President or higher. You must contact the Legal Department and the ECO far enough in advance to allow a review of the proposed entertainment. You can also submit your request through this [form](#).

- All entertainment provided to Government Officials must be reported to Government Relations and the ECO including a description of the entertainment, the per attendee value of the entertainment, the date the entertainment was provided, the name, title, and organization of the attendees, and the business purpose of the entertainment.

Policy on Offering, Providing or Accepting Corporate Hospitality and Travel

- **Commercial (Non-Governmental) Third Parties: Offering, Providing, and Accepting Corporate Hospitality and Travel**
 - All corporate hospitality and travel offered, provided, or accepted related to commercial third parties must be approved in advance in writing by your direct manager and/or the manager in your direct reporting line at the level of regional or country General Manager or Business Unit Vice-President or higher
 - Any corporate hospitality and travel must serve a legitimate business purpose above and beyond developing relationships and may not be provided solely as a gift, for entertainment, recreation, or a non-Lenovo business purpose.
 - The number of business days spent on non-business events must be strictly limited and in proportion to the amount of time spent on business activities.
 - Lenovo or the third party offering the travel may not pay any expenses for any spouses, family members, or personal guests to accompany the traveler for any portion of the travel.
 - Payments for all approved expenses for airfare, transportation, meals, accommodation, or incidentals shall be made directly to the provider of services and not to the individual receiving the corporate hospitality and travel. Any exceptions to this rule must be pre-approved by the ECO and the Legal Department representative for your Geo or business unit.
 - Class of travel provided to commercial third party representatives should be equivalent to the class of travel that would be provided to Lenovo employees under the Lenovo Global Travel Policy for your region.

Government Officials: Offering, Providing, and Accepting Corporate Hospitality and Travel

Any corporate hospitality and travel provided by Lenovo to any Government Officials (including government customers) must comply with the following requirements. This includes pre-paid travel included in purchase contracts from government agencies.

- All corporate hospitality and travel for Government Officials must be approved in advance by the ECO, the General Counsel for your Region, and a manager in your direct reporting line at the level of regional or country General Manager or

Business Unit Vice-President or higher. You must submit any request for travel sufficiently in advance to allow time for review.

- Any corporate hospitality and travel paid for, hosted by or otherwise sponsored by Lenovo must serve an appropriate business purposes above and beyond developing relationships and there must be a valid business purpose related to Lenovo on each stop on the itinerary.
- The number of business days spent on non-business events must be strictly limited. corporate hospitality and travel for Government Officials to locations typically considered tourist or vacation destinations will be highly scrutinized for business relevance and are likely not to be approved.
- The travelers should be selected by the government entity, and not by Lenovo.
- The length of the travel must be commensurate with the business purpose. The timing of the travel must be reasonably connected with the timing of the business purpose.
- A Lenovo escort should accompany the travelers during regular business hours and during all Lenovo-sponsored evening and weekend entertainment.
- Lenovo may not pay any expenses for any spouses, family members, or personal guests to accompany the traveler for any portion of the travel.
- Payments for all approved expenses for airfare, transportation, meals, accommodation, or incidentals shall be made directly by Lenovo to the provider of services unless the ECO and the General Counsel of your region authorize an exception.
- Class of travel provided to Government Officials should be equivalent to the class of travel that would be provided to Lenovo employees under the Lenovo Travel Policy that applies to your region.
- Process to Approve travel by Government Official
 - All expenses related to any travel and hospitality provided to any Government Officials, including government customers and journalists working for government-owned media companies, must be approved in writing, in advance by the ECO, the Vice-President overseeing the Geo or Business Unit that will sponsor the travel or hospitality, and the General Counsel for the region.
 - All requests for Lenovo-sponsored travel for Government Officials must be submitted to the ECO through this [form](#). All required approvals must be obtained before the proposed departure date of the travel.
 - Corporate hospitality and travel for Government Officials who are not customers or representatives of the media, including regulators or elected officials, must be approved by Lenovo Government Relations.
 - Any changes to the proposed corporate hospitality and travel after final ECO approval must be reported to the ECO for review and re-approval.
 - After the corporate hospitality and travel has taken place, a copy of the actual expenses incurred (including receipts and invoices) must be submitted to the Vice-President of your Business Unit and the Business Unit CFO and the final costs must be reconciled to the approved itinerary.

Country-specific Gifts, Entertainment, Corporate Hospitality and Travel Country Table is available [here](#) or from the ECO.