

# RESPONSIBLE MINERALS SOURCING 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 57,000 employees serving customers in more than 180 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](http://www.lenovo.com).

This Conflict Minerals Report of Lenovo Group Limited (Lenovo) for calendar year **2019** 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](http://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](http://www.oecd.org))
- RBA – Responsible Business Alliance ([www.responsiblebusiness.org](http://www.responsiblebusiness.org))
- RCOI – Responsible Country of Origin Inquiry (Survey / Ask)
- RMAP – Responsible Minerals Assurance Process (RMAP)
- RMI – Responsible Minerals Initiative ([www.responsiblemineralsinitiative.org](http://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.

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However, we did achieve 100% conflict-free with the reported and verified Tantalum smelters. Furthermore, we estimated that our supply chain is 97% conflict-free with all our products.

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 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. Much 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. only price and legal terms). For example, we did not direct the CPU, Storage, Memory, Planar, Battery and other electronic suppliers on their parts, ingredients and components in their products other than restriction of hazardous substances.

Lenovo did not purchase raw or refined ore in the DRC, CC, or any other country. 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.

Lenovo by far is not a manufacturer or nor conducts “contract to manufacture” per the Dodd-Frank definition for significantly much of our procurement spend, and we were a final assembly/test operation and our suppliers acted more as retailers. Much of our supplier relationships are better characterized as one in which Lenovo is a “sales channel” as opposed to one in which the issuer is “outsourcing manufacturing”. As noted above much of our key parts are industry standard componentry indistinguishable for our supplier’s other customers. Nevertheless, Lenovo conducts conflict mineral due diligence on 95% of our procurement spend regardless of these exceptions.

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

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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."

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's to be conflict-free conformant. 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: <https://www.lenovo.com/us/en/sustainability-resources>
- 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.

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- 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 40 suppliers who met with our senior executives semi-annually.
  - ✓ We established our expectations via formal communications, supplier RBA Agreements and our Lenovo conflict minerals policy. We also have a formal Supplier Code of Conduct which further incorporates our requirements.
  - ✓ 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 2019, we increased our demand on suppliers to discontinue the use of non-conformant smelters. We also directly engaged with smelters and refiners to undergo RMAP audits.
  - ✓ We actively participated in the RMI's programs. RMI's tools and guidance documents helped Lenovo address responsible sourcing risks for minerals.
  - ✓ We integrated a joint venture – Fujitsu (FCCL) and their suppliers into our company level Responsible Sourcing program.
  - ✓ Lenovo kept investing personnel resource driving China smelters engagement by joining China SET (smelter engagement team) in RMI and SPOC (Single Point of Contact) for both 3TG and 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 ([https://www.lenovo.com/us/en/social\\_responsibility/human\\_rights\\_policy/](https://www.lenovo.com/us/en/social_responsibility/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 supply 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's actually located in the DRC or the surrounding countries?

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- Had the SOR procured ore from DRC or CC?
- 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 worldwide nature of supply chains could the risk be presented with most SOR's matter where they are located?
- Even though an SOR was reported in our supply chain, were we certain the mineral content was actually in our products?

#### **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, whether they were actually **in our supply chain or not** and either get them conformant 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 conformant smelters are used and leveraged the Smelter Engagement Team (SET) workgroup efforts on non-conformant and non-active SOR.
- Smelter / Refiner Discontinuation
  - ✓ Since hundreds of companies and many RBA/RMI members share many of the same SOR's, 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-conformant 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 Responsible Minerals Sourcing Policy and 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

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- ✓ 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 SOR's 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 3<sup>rd</sup> Party Audits**

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'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: <https://www.lenovo.com/us/en/sustainability-resources>.

#### **7.0 Additional Measures to be Taken**

Lenovo will take further steps in calendar year 2020 to improve our efforts and to continue our results. We have a goal of improving our overall conflict-free posture to 98% by end of CY2020. And we will:

- Increase our smelter engagement efforts, targeting smelters and refiners at risk of non-renewal and encouraging those yet to be audited.
- Developing tools to increase the accuracy and efficiency in our DD process.
- Institutionalize Cobalt along with 3TG.
- Continue to directly engage smelters and refiners to undergo RMAP audits through active participation in RMI workgroups. Contribute volunteer as SPOC (Single Point of Contact) for 3TG and 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.
- Further automate our consolidation of supplier CMRT data.

#### **8.0 Smelter and Refiner Key Indicators**

From Lenovo's RCOI and DD efforts we have identified as best possible all of the SOR's in our supply chain and determined how many are conflict-free conformant. The below table indicates our overall progress trend and CY2019 performance.

Lenovo Status	2014	2015	2016	2017	2018	2019
% Conflict Free	50%	75%	80%	82%	89%	97%

Conflict Mineral	Total SOR	Conformant	Active	Out-Reach In-Comms	% Conformant
Ta – Tantalum	39	39	0	0	100%
S – Tin	80	77	1	2	96%

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W - Tungsten	43	42	1	0	98%
Au - Gold	111	106	1	4	95%
Overall	273	264	3	6	97%

#### Other Key Statistics

- Approximately 78% of our suppliers by spending were RBA / RMI members
- We generally cover about 95% of our procurement spend in our RBA programs where suppliers DD programs are validated by independent 3<sup>rd</sup> 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.
- 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 CMRT with their suppliers, require them to be conflict-free and request SOR names
- # of Suppliers with Non-Conformant / Non-Active SOR: 15
- # of Non-Conformant / Non-Active SOR: 6
- 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 Program execution 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

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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.

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 greater than 90% conflict free. .

#### **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 conformant 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.

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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.

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.

#### Lenovo 3TG Smelter List:

##### Conformant Smelters

Metal	Smelter	Country
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	CHINA
Tantalum	F&X Electro-Materials Ltd.	CHINA
Tantalum	Global Advanced Metals Boyertown	UNITED STATES OF AMERICA
Tantalum	H.C. Starck Co., Ltd.	THAILAND
Tantalum	H.C. Starck Tantalum and Niobium GmbH	GERMANY
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	Jiujiang Tanbre Co., Ltd.	CHINA
Tantalum	Mitsui Mining and Smelting Co., Ltd.	JAPAN
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA
Tantalum	Solikamsk Magnesium Works OAO	RUSSIAN FEDERATION
Tantalum	Taki Chemical Co., Ltd.	JAPAN
Tantalum	Ulba Metallurgical Plant JSC	KAZAKHSTAN
Tin	Alpha	UNITED STATES OF AMERICA
Tin	China Tin Group Co., Ltd.	CHINA
Tin	Dowa	JAPAN
Tin	Metallo Spain S.L.U.	SPAIN
Tin	Fenix Metals	POLAND
Tin	Magnu's Minerais Metais e Ligas Ltda.	BRAZIL
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA

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Tin	Metallo Belgium N.V.	BELGIUM
Tin	Mineracao Taboca S.A.	BRAZIL
Tin	Minsur	PERU
Tin	Mitsubishi Materials Corporation	JAPAN
Tin	O.M. Manufacturing Philippines, Inc.	PHILIPPINES
Tin	Operaciones Metalurgicas S.A.	BOLIVIA (PLURINATIONAL STATE OF)
Tin	White Solder Metalurgia e Mineracao Ltda.	BRAZIL
Tin	PT Mitra Stania Prima	INDONESIA
Tin	PT Refined Bangka Tin	INDONESIA
Tin	PT Timah Tbk Kundur	INDONESIA
Tin	PT Timah Tbk Mentok	INDONESIA
Tin	Rui Da Hung	TAIWAN, PROVINCE OF CHINA
Tin	Soft Metais Ltda.	BRAZIL
Tin	Thaisarco	THAILAND
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CHINA
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	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	Ma'anshan Weitai Tin Co., Ltd.	CHINA
Tin	Melt Metais e Ligas S.A.	BRAZIL
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND
Tin	Resind Industria e Comercio Ltda.	BRAZIL
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	Asaka Riken Co., Ltd.	JAPAN
Gold	CCR Refinery - Glencore Canada Corporation	CANADA
Gold	Chimet S.p.A.	ITALY
Gold	Dowa	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	JX Nippon Mining & Metals Co., Ltd.	JAPAN
Gold	Kojima Chemicals Co., Ltd.	JAPAN
Gold	LS-NIKKO Copper Inc.	KOREA, REPUBLIC OF

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Gold	Materion	UNITED STATES OF AMERICA
Gold	Matsuda Sangyo Co., Ltd.	JAPAN
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	Nihon Material Co., Ltd.	JAPAN
Gold	Ohura Precious Metal Industry Co., Ltd.	JAPAN
Gold	PAMP S.A.	SWITZERLAND
Gold	PX Precinox S.A.	SWITZERLAND
Gold	Rand Refinery (Pty) Ltd.	SOUTH AFRICA
Gold	Royal Canadian Mint	CANADA
Gold	SEMPA Joyeria Plateria S.A.	SPAIN
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHINA
Gold	Solar Applied Materials Technology Corp.	TAIWAN, PROVINCE OF CHINA
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
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA
Tungsten	Xiamen Tungsten Co., Ltd.	CHINA
Tungsten	A.L.M.T. Corp.	JAPAN
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA
Tungsten	Ganzhou Huaxing Tungsten Products 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	H.C. Starck Smelting GmbH & Co. KG	GERMANY
Tungsten	Japan New Metals Co., Ltd.	JAPAN
Tungsten	Kennametal Huntsville	UNITED STATES OF AMERICA
Tungsten	Masan Tungsten Chemical LLC (MTC)	VIET NAM
Tungsten	Tejing (Vietnam) Tungsten Co., Ltd.	VIET NAM
Tungsten	Wolfram Bergbau und Hutten AG	AUSTRIA
Gold	8853 S.p.A.	ITALY
Gold	Advanced Chemical Company	UNITED STATES OF AMERICA
Gold	Al Etihad Gold Refinery DMCC	UNITED ARAB EMIRATES
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN
Gold	Asahi Refining Canada Ltd.	CANADA
Gold	Asahi Refining USA Inc.	UNITED STATES OF AMERICA
Gold	AU Traders and Refiners	SOUTH AFRICA

**RESPONSIBLE MINERALS SOURCING REPORT OF LENOVO GROUP UNLIMITED**

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

Gold	Aurubis AG	GERMANY
Gold	Bangalore Refinery	INDIA
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES
Gold	Boliden AB	SWEDEN
Gold	C. Hafner GmbH + Co. KG	GERMANY
Gold	Cendres + Metaux S.A.	SWITZERLAND
Gold	DODUCO Contacts and Refining GmbH	GERMANY
Gold	DS PRETECH Co., Ltd.	KOREA, REPUBLIC OF
Gold	DSC (Do Sung Corporation)	KOREA, REPUBLIC OF
Gold	Eco-System Recycling Co., Ltd. East Plant	JAPAN
Gold	Emirates Gold DMCC	UNITED ARAB EMIRATES
Gold	Geib Refining Corporation	UNITED STATES OF AMERICA
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CHINA
Gold	LT Metal Ltd.	KOREA, REPUBLIC OF
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CHINA
Gold	Italpreziosi	ITALY
Gold	JSC Uralelectromed	RUSSIAN FEDERATION
Gold	Kazzinc	KAZAKHSTAN
Gold	Kennecott Utah Copper LLC	UNITED STATES OF AMERICA
Gold	KGHM Polska Miedz Spolka Akcyjna	POLAND
Gold	Korea Zinc Co., Ltd.	KOREA, REPUBLIC OF
Gold	Kyrgyzaltyn JSC	KYRGYZSTAN
Gold	L'Orfebre S.A.	ANDORRA
Gold	Marsam Metals	BRAZIL
Gold	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE
Gold	Metalor Technologies (Suzhou) Ltd.	CHINA
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	MEXICO
Gold	MMTC-PAMP India Pvt., Ltd.	INDIA
Gold	Moscow Special Alloys Processing Plant	RUSSIAN FEDERATION
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	TURKEY
Gold	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	AUSTRIA
Gold	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	RUSSIAN FEDERATION
Gold	OJSC Novosibirsk Refinery	RUSSIAN FEDERATION
Gold	Planta Recuperadora de Metales SpA	CHILE
Gold	Prioksky Plant of Non-Ferrous Metals	RUSSIAN FEDERATION
Gold	PT Aneka Tambang (Persero) Tbk	INDONESIA
Gold	REMONDIS PMR B.V.	NETHERLANDS
Gold	SAAMP	FRANCE
Gold	Safimet S.p.A	ITALY

**RESPONSIBLE MINERALS SOURCING REPORT OF LENOVO GROUP UNLIMITED**

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

Gold	Samduck Precious Metals	KOREA, REPUBLIC OF
Gold	SAXONIA Edelmetalle GmbH	GERMANY
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CHINA
Gold	Singway Technology Co., Ltd.	TAIWAN, PROVINCE OF CHINA
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals	RUSSIAN FEDERATION
Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN
Gold	SungEel HiMetal Co., Ltd.	KOREA, REPUBLIC OF
Gold	T.C.A S.P.A	ITALY
Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN
Gold	The Refinery of Shandong Gold Mining Co., Ltd.	CHINA
Gold	Tokuriki Honten Co., Ltd.	JAPAN
Gold	Torecom	KOREA, REPUBLIC OF
Gold	Umicore Brasil Ltda.	BRAZIL
Gold	Umicore Precious Metals Thailand	THAILAND
Gold	Umicore S.A. Business Unit Precious Metals Refining	BELGIUM
Gold	WIELAND Edelmetalle GmbH	GERMANY
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CHINA
Tin	CV Ayi Jaya	INDONESIA
Tin	CV Dua Sekawan	INDONESIA
Tin	CV Gita Pesona	INDONESIA
Tin	CV United Smelting	INDONESIA
Tin	CV Venus Inti Perkasa	INDONESIA
Tin	EM Vinto	BOLIVIA (PLURINATIONAL STATE OF)
Tin	Gejiu Fengming Metallurgy Chemical Plant	CHINA
Tin	Gejiu Kai Meng Industry and Trade LLC	CHINA
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CHINA
Tin	Gejiu Zili Mining and Metallurgy Co., Ltd.	CHINA
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CHINA
Tin	Jiangxi New Nanshan Technology Ltd.	CHINA
Tin	Metallic Resources, Inc.	UNITED STATES OF AMERICA
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 Babel Surya Alam Lestari	INDONESIA
Tin	PT Bangka Prima Tin	INDONESIA
Tin	PT Bangka Serumpun	INDONESIA
Tin	PT Bangka Tin Industry	INDONESIA
Tin	PT Belitung Industri Sejahtera	INDONESIA
Tin	PT Bukit Timah	INDONESIA
Tin	PT DS Jaya Abadi	INDONESIA

**RESPONSIBLE MINERALS SOURCING REPORT OF LENOVO GROUP UNLIMITED**

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

Tin	PT Inti Stania Prima	INDONESIA
Tin	PT Karimun Mining	INDONESIA
Tin	PT Kijang Jaya Mandiri	INDONESIA
Tin	PT Menara Cipta Mulia	INDONESIA
Tin	PT Panca Mega Persada	INDONESIA
Tin	PT Premium Tin Indonesia	INDONESIA
Tin	PT Prima Timah Utama	INDONESIA
Tin	PT Rajawali Rimba Perkasa	INDONESIA
Tin	PT Rajehan Ariq	INDONESIA
Tin	PT Sariwiguna Binasentosa	INDONESIA
Tin	PT Stanindo Inti Perkasa	INDONESIA
Tin	PT Sukses Inti Makmur	INDONESIA
Tin	PT Sumber Jaya Indah	INDONESIA
Tin	PT Tinindo Inter Nusa	INDONESIA
Tin	PT Tirus Putra Mandiri	INDONESIA
Tin	PT Tommy Utama	INDONESIA
Tin	Thai Nguyen Mining and Metallurgy Co., Ltd.	VIET NAM
Tin	Tin Technology & Refining	UNITED STATES OF AMERICA
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA
Tin	Yunnan Tin Company Limited	CHINA
Tin	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	CHINA
Tungsten	ACL Metais Eireli	BRAZIL
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.	CHINA
Tungsten	Fujian Jinxin Tungsten Co., Ltd.	CHINA
Tungsten	Ganzhou Haichuang Tungsten Co., Ltd.	CHINA
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA
Tungsten	H.C. Starck Tungsten GmbH	GERMANY
Tungsten	Hunan Chenzhou Mining Co., Ltd.	CHINA
Tungsten	Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji	CHINA
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.	CHINA
Tungsten	Hydrometallurg, JSC	RUSSIAN FEDERATION
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA
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 OF AMERICA
Tungsten	KGETS Co., Ltd.	KOREA, REPUBLIC OF
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CHINA
Tungsten	Moliren Ltd.	RUSSIAN FEDERATION
Tungsten	Niagara Refining LLC	UNITED STATES OF AMERICA

**RESPONSIBLE MINERALS SOURCING REPORT OF LENOVO GROUP UNLIMITED**

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

Tungsten	Philippine Chuangxin Industrial Co., Inc.	PHILIPPINES
Tungsten	Unecha Refractory metals plant	RUSSIAN FEDERATION
Tungsten	Woltech Korea Co., Ltd.	KOREA, REPUBLIC OF
Tungsten	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	CHINA
Tungsten	Xinhai Rendan Shaoguan Tungsten Co., Ltd.	CHINA
Tantalum	Jiangxi Tuohong New Raw Material	CHINA
Tantalum	Guangdong Rising Rare Metals-EO Materials Ltd.	CHINA
Tantalum	Exotech Inc.	UNITED STATES OF AMERICA
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA
Tantalum	D Block Metals, LLC	UNITED STATES OF AMERICA
Tantalum	Global Advanced Metals Aizu	JAPAN
Tantalum	Guangdong Zhiyuan New Material Co., Ltd.	CHINA
Tantalum	LSM Brasil S.A.	BRAZIL
Tantalum	Mineracao Taboca S.A.	BRAZIL
Tantalum	Telex Metals	UNITED STATES OF AMERICA
Tantalum	KEMET Blue Metals	MEXICO
Tantalum	Metallurgical Products India Pvt., Ltd.	INDIA
Tantalum	QuantumClean	UNITED STATES OF AMERICA
Tantalum	FIR Metals & Resource Ltd.	CHINA
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA
Tantalum	KEMET Blue Powder	UNITED STATES OF AMERICA
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	CHINA
Tantalum	Asaka Riken Co., Ltd.	JAPAN
Tantalum	Resind Industria e Comercio Ltda.	BRAZIL
Tantalum	PRG Dooel	NORTH MACEDONIA, REPUBLIC OF
Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINA
Tin	PT Lautan Harmonis Sejahtera	INDONESIA
Tungsten	Asia Tungsten Products Vietnam Ltd.	VIET NAM
Gold	Chugai Mining	JAPAN
Gold	Eco-System Recycling Co., Ltd. North Plant	JAPAN
Gold	Eco-System Recycling Co., Ltd. West Plant	JAPAN
Tungsten	Hunan Litian Tungsten Industry Co., Ltd.	CHINA
Tungsten	Lianyou Metals Co., Ltd.	TAIWAN, PROVINCE OF CHINA
Tantalum	NPM Silmet AS	ESTONIA

**Active Smelters**

Metal	Smelter	Country
Tin	Precious Minerals and Smelting Limited	INDIA
Gold	SAFINA A.S.	CZECH REPUBLIC

## RESPONSIBLE MINERALS SOURCING REPORT OF LENOVO GROUP UNLIMITED

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

Tungsten	Jiangxi Xianglu Tungsten Co., Ltd.	CHINA
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#### Outreach / In-Communications Smelters

Metal	Smelter	Country
Tin	Dongguan CiEXPO Environmental Engineering Co., Ltd.	CHINA
Tin	Modeltech Sdn Bhd	MALAYSIA
Gold	Guangdong Jinding Gold Limited	CHINA
Gold	NH Recytech Company	KOREA, REPUBLIC OF
Gold	Abington Reldan Metals, LLC	UNITED STATES OF AMERICA
Gold	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	RUSSIAN FEDERATION

#### 11.0 Cobalt

The mining of cobalt has been linked to OECD Annex II risks including child labor and other human rights abuses in the DRC. Lenovo has implemented the OECD Due Diligence Guidelines for the sourcing of this mineral and expect suppliers to participate in our cobalt due diligence processes. As with 3TG, responsible sourcing of cobalt is a complex issue that requires industry-wide collaboration.

In 2018, we conducted our first Due Diligence effort on Cobalt using RMI pilot tools, on battery suppliers and other commodities covering 65% overall procurement spend. We learned that most cobalt refining was concentrated in China, the RMAP participation rate for Cobalt refiners was very low, and about 77% of non-conformant smelters needed to be outreached and convinced to participate in RMAP. We shared our pilot run results and cobalt refiners list with RMI to help them build their list of eligible cobalt refiners as well as further develop the RMAP standard for cobalt. During this time, we created Lenovo's Cobalt Responsible Sourcing Policy (<https://www.lenovo.com/us/en/sustainability-resources>). The policy set expectations for suppliers to follow OECD Due Diligence Guidelines for cobalt, and to participate in Lenovo's due diligence processes and capability building efforts around responsible cobalt sourcing.

During 2019, Lenovo conducted a full cycle of Cobalt survey collection, covered 95% overall spend, received 86% respond rate. We estimated that our supply chain is 17% conformant and 69% including smelters active with the RMI to become compliant.

In 2020, Lenovo will continue to drive due diligence effort same as we do for 3TG and work with RMI to develop tools and programs, to assure our commitment to transparency and respect for human rights.

#### Lenovo Cobalt Smelter List:

##### Conformant Cobalt Smelters:

Smelter	Country
Umicore Olen	BELGIUM
Umicore Finland Oy	FINLAND
A.L.M.T. Corp.	JAPAN

**RESPONSIBLE MINERALS SOURCING REPORT OF LENOVO GROUP UNLIMITED**

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

Japan New Metals Co., Ltd.	JAPAN
Wolfram Bergbau und Hutten AG	AUSTRIA
Xiamen Tungsten Co., Ltd.	CHINA

**Active Cobalt Smelters:**

Smelter	Country
Gem (Jiangsu) Cobalt Industry Co., Ltd.	CHINA
Guangxi Yinyi Advanced Material Co., Ltd.	CHINA
Ganzhou Tengyuan Cobalt New Material Co., Ltd.	CHINA
Guangdong Jiana Energy Technology Co., Ltd.	CHINA
Jingmen GEM Co., Ltd.	CHINA
Quzhou Huayou Cobalt New Material Co., Ltd.	CHINA
Tianjin Maolian Science & Technology Co., Ltd.	CHINA
Murrin Murrin Nickel Cobalt Plant	AUSTRALIA
SungEel HiTech Co., Ltd.	KOREA, REPUBLIC OF
Zhejiang Huayou Cobalt Co., Ltd.	CHINA
Lanzhou Jinchuan Advanced Materials Technology Co., Ltd.	CHINA
Ganzhou Highpower Technology Co., Ltd.	CHINA
Jiangsu Xiongfeng Technology Co., Ltd.	CHINA
Nantong Xinwei Nickel Cobalt Technology Development Co., Ltd.	CHINA
New Era Group Zhejiang Zhongneng Cycle Technology Co., Ltd.	CHINA
Zhuhai Kelixin Metal Materials Co., Ltd.	CHINA
Hunan Zoomwe New Energy Science & Technology Co., Ltd.	CHINA
Hunan Yacheng New Materials Co., Ltd.	CHINA

**Outreach / In-Communications Cobalt Smelters**

Smelter	Country
Gangzhou Yi Hao Umicore Industry Co.	CHINA
Dynatec Madagascar Company	MADAGASCAR
Hunan Brunp Recycling Technology Co., Ltd.	CHINA
JSC Kolskaya Mining and Metallurgical Company (Kola MMC)	RUSSIAN FEDERATION
XTC New Energy Materials (Xiamen) LTD.	CHINA
Glencore Nikkelverk Refinery	NORWAY
Jiangxi Jiangwu Cobalt industrial Co., Ltd.	CHINA
Sumitomo Metal Mining	JAPAN
NORILSK NICKEL HARJAVALTA OY	FINLAND
Port Colborne Refinery	CANADA
Fort Saskatchewan Metals Facility	CANADA

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