

LENOVO ANTI-CORRUPTION/ BRIBERY 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 may not offer, promise, authorize, provide or accept bribes or improper gifts in any form in our work for Lenovo. We also may not ask or allow anyone including our business partners (such as agents, consultants, channel partners, vendors, or service providers) to offer, promise, authorize, provide or accept improper gifts or bribes on our behalf. This policy applies to any interactions we have on behalf of Lenovo, including interactions with Government Officials and with individuals in the private or commercial sector.

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.

General Prohibition on Bribery

Lenovo and any Lenovo representative may not offer, promise, authorize, provide or accept, either directly or indirectly, a bribe or anything of value (or engage in actions that give the appearance of offering, promising, authorizing, providing or accepting a bribe or anything of value) to a Government Official or other individual, including those in the private or commercial sector, or another entity in order to improperly influence that individual to act favorably towards Lenovo, including to obtain or retain business, or to secure any improper advantage for Lenovo. Lenovo representatives may not solicit, request, authorize, or agree with a third party to make any such promise, offer, authorization, provision or acceptance on Lenovo's behalf.

No Lenovo representative may, directly or indirectly, request, agree to receive, or accept a bribe, including anything of value (or engage in actions that give the appearance of requesting, agreeing to receive or accepting a bribe or anything of value) from a third party with the intent of being influenced in the performance of his or her functions at Lenovo.

A bribe can be anything of tangible or intangible value. Anything of value could include cash equivalents (for example gifts cards or redeemable vouchers), gifts, entertainment, travel (including travel overseas and to tourist destinations), accommodations, loans, gold (or other

precious metals) or jewelry, a donation to someone's favorite charity, guest passes to a private club, home repairs, political contributions, or jobs or internships for family members.

Comply with Laws, Regulations, and Treaties Wherever Lenovo Does Business

The provisions of this policy apply everywhere Lenovo does business with no exceptions. In addition, we must follow all applicable laws, regulations, and international treaties that apply wherever Lenovo does business. This policy does not address the specific provisions of all the laws, regulations, and treaties Lenovo must comply with every place we do business. Check with the ECO or your Geo Legal Department to make sure you know any additional rules that apply to your country or the country in which you are doing business.

Definition of Government Officials

Take special care when dealing with Government Officials. Many countries where we do business have very strict anti-bribery laws that regulate how we interact with Government Officials. While in some locations, providing gifts and entertainment to Government Officials is an appropriate part of doing business, it could be violating anti-bribery laws in others. Therefore, even in countries where it may be customary to provide gifts and entertainment to Government Officials, due to the far-reaching anti-bribery laws, the Lenovo policies must be strictly followed in all countries.

The definition of Government Official under anti-bribery laws is very broad. For the purposes of this policy, a "Government Official" includes anyone, regardless of rank and regardless of whether the person is paid or unpaid, who falls into one of the categories listed below:

- Officers and employees of any local, provincial, or national government including police officers, members of the military, customs inspectors, tax auditors, employees of government consumer safety organizations, and appointees to government boards.
- Employees or representatives of government-owned or controlled businesses or institutions, including employees of government-owned telecom companies, government hospitals, media companies, and public schools and universities.
- Employees or representatives of public international organizations, including the United Nations, the International Olympic Committee, and the World Bank.
- People working on behalf of a government or public international organization such as an official advisor to a government.
- Employees or representatives of a political party.
- Candidates for political office.
- Members of royal families.
- Close relatives (including parents, sibling, spouse, or child) or the significant other (including for example, romantic partners and close personal friends) of any of the above.

Accounting and Record-Keeping

All Lenovo transactions must be accurately recorded in Lenovo's books and records, and must, in reasonable detail, accurately and fairly reflect company and financial transactions. We must

follow all laws, regulations, standards, internal controls, and Lenovo accounting and financial reporting policies.

- No one at Lenovo may establish any undisclosed or unrecorded accounts (such as “off the books accounts”) on behalf of the company for any purpose.
- Never try to conceal (or do anything that could appear to be an attempt to conceal) the nature of any business courtesy (including any gifts, entertainment, or travel) provided to anyone, including any Government Officials. Make sure to record the name, title, and organization of anyone receiving a gift or business courtesy and list the purpose of providing the courtesy.
- False, misleading, or artificial entries may not be made in Lenovo’s books and records for any reason.
- Ensure that any vendor, consultant, or other third party working for Lenovo submits accurate invoices and records documenting any goods or services provided on behalf of Lenovo with a reasonable level of specificity.
- Follow all Lenovo policies when submitting financial transactions. Ensure that you provide sufficient evidence to show the business justification and details of each transaction including contracts, forms, and backup documentation.

Any exceptions or possible violations in Lenovo’s accounting books and records must be reported immediately to the ECO, your local Legal Department, Lenovo Internal Audit, or to the LenovoLine.

No Direct Payments of Any Size to Government Officials

This policy expressly prohibits anyone at Lenovo from making any payment, of any size, large or small, directly to a Government Official for any reason, including to expedite routine, non-discretionary government actions such as processing visas; obtaining permits and licenses; providing police protection or mail service; or scheduling inspections associated with contract performance. These types of payments are sometimes referred to as “facilitating” or “grease” payments. This restriction does not apply to fees associated with official processes approved by governments for expediting services. Contact the ECO or your local Legal Department if you have any questions about what constitutes an appropriate payment.

Use of Business Intermediaries

Lenovo can be held criminally liable if a bribe or anything of value is offered, promised, authorized, provided or accepted through third parties acting on Lenovo’s behalf. All Lenovo business intermediaries including agents, representatives, channel partners, consultants, and service providers must comply with this policy. All Lenovo business intermediaries that will interact with Government Officials on Lenovo’s behalf must go through any due diligence process designated by your local Legal Department or the ECO.

Gifts, Entertainment, Corporate Hospitality, and Travel and other Business Expenditures

All gifts, entertainment, corporate hospitality and travel provided or accepted by anyone at Lenovo, and any business expenditure including payments or reimbursements to commercial

third parties (non-government) and Government Officials must comply with Lenovo's Global Gift, Entertainment, Corporate Hospitality and Travel Policy. This includes Lenovo's sponsorship of education programs, conferences, or training where a third party or Government Official could receive something of value; any expenditures related to the execution or performance of a contract with a government entity; or any donations or gifts of products, services, money or any business courtesy of any value to any third party including a government agency or a public international organization.

Political Contributions

We may not provide Lenovo funds, assets, services, or facilities for the benefit of a candidate for public office, a political party or a party official unless permitted by applicable law and approved in advance in writing by Lenovo Government Relations. We may not provide anything of value to any political parties, party officials, or candidates for the purpose of obtaining, retaining, or directing business to Lenovo or any other specific entity.

Charitable Contributions

Charitable contributions must never be used to conceal a bribe or other improper purpose. All charitable contributions (including contributions of money and donations of Lenovo products, equipment, or anything of value) must be reviewed for business justification, appropriateness of the recipient, and compliance with applicable laws.

We must follow these rules when making charitable contributions for Lenovo:

- Proposals for charitable contributions must be submitted in writing to and approved by an executive in the business unit making the donation (Vice President or above) and the Geo or Business Unit Chief Financial Officer (CFO) according to established procedures.
- Donations must never create the appearance of a bribe, kickback, or other corrupt practice.
- Donations must never be used to directly procure future Lenovo business or otherwise be made with the intent to obtain or retain business, secure an improper advantage, or induce anyone to act improperly.
- All charitable organizations receiving donations must be screened by the ECO to determine that (i) it is a legitimate charitable organization and (ii) it has no connection to a Government Official (or a close relative of an official) who is in a position to act or make a decision in favor of Lenovo.
- Charitable contributions must also be accurately recorded in Lenovo's books and records.
- Donations must be consistent with Lenovo's Conflict of Interest Policy. [\[insert link\]](#)
- In case of any doubt, confirm in advance the donation is lawful under the written laws and regulations of the country/locality where the donation will be made with your local Legal Department.

Sponsorships

Sponsorship, as used in this policy, refers to any arrangement whereby Lenovo provides anything of value including financial support, products, services, use of Lenovo facilities to a third party (including charitable organizations) in return for the right to associate Lenovo's image, brands or products with an activity, or to receive some other lawful benefit, such as participation in an event.

All sponsorships must follow the appropriate internal Lenovo approval process. In addition, when providing sponsorships, we must follow these rules:

- Never offer or provide a sponsorship to improperly influence anyone or to obtain an improper advantage.
- Never provide a sponsorship that creates the appearance of a bribe, kickback or other corrupt practice.
- Ensure that any sponsorship is consistent with Lenovo's brand and core values.
- Ensure that all sponsorship agreements are documented in writing, and that payments are made to the entity receiving the sponsorship and not any individual.
- Follow this policy and the Global Gift, Entertainment, Corporate Hospitality, and Travel Policy when giving away anything Lenovo receives in exchange for the sponsorship such as products or tickets to the event that is being sponsored.

Mergers, Acquisitions, and Joint Ventures

Lenovo may be held liable for past bribery or other violations committed by any company Lenovo acquires and may be held liable for the actions of any joint ventures in which Lenovo has an interest. In addition, Lenovo may be held liable for any bribery or other violations that occur after an acquisition, from the first day forward. Accordingly, Lenovo must review, as part of the acquisition due diligence process or as part of the formation, investment in, operation of, or oversight of a joint venture, certain aspects related to the target company's or the joint venture's compliance with anti-bribery and anti-corruption laws and whether the target or joint venture partner has weaknesses in accounting, record keeping, or internal controls or whether Government Officials (or close relatives of Government Officials) are employed by the target's or joint venture partner's business (either as owners, directors, or employees). Please contact the Corporate Lenovo Legal Department for further guidance regarding acquisition or joint venture due diligence. After the closing, Lenovo must address any issues that were not resolved by the diligence, and work to integrate the new business as appropriate into Lenovo's compliance program and internal controls.

Recognize Situations that Require Heightened Awareness

We must be alert to circumstances or situations that may indicate violations of this policy or applicable law. Whenever we come across these circumstances or situations, also known as "red flags," we should check with the ECO or your local Legal Department to ensure we are following Lenovo Policy and the law.

Examples:

- Requests from third parties for unusual financial arrangements, including to make payments to another third party or to a bank account not located in the country where the services were rendered.
- Requests from third parties for unusually high commissions or fees, or unusual discounts.
- Lack of transparency in expense and accounting records.
- Refusal of a third party to provide detailed invoices.
- A Government Official recommends or requires hiring a consultant or multiple subcontractors without clear business justification.

Report Any Concerns or Potential Violations

You have an obligation to report any concerns or violations of this policy. You have several resources to make a confidential report including:

- Your manager (provided your manager is not involved in the violation) or another manager you trust
- Ethics and Compliance Office (ECO)
- Human Resources
- LenovoLine (where reports can be made anonymously in many countries)
- The Legal Department