

# CODE OF CONDUCT

**Lenovo**<sup>™</sup>

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Dear Team,

For the past several years, Lenovo has been steadily growing, becoming one of the world's largest and most respected makers of PCs, smartphones, tablets and servers, and providers of cloud services. We have more customers in more places buying more devices than ever before. With our bigger business and higher profile comes not only great opportunity, but also great responsibility.

That is why we must have a clear, strong, consistent Code of Conduct.

This Code reflects an extension of our culture of integrity and our continued commitment to ethical business practices and complying with the law. We expect all of our employees and representatives to understand and comply with our Code and exercise good judgment when making business decisions. The Code summarizes the principles and policies that govern our company. This Code must apply to every business decision in every area of the company worldwide. Please use this Code and the resources described in it to help answer your questions or address your concerns.

As we continue to transform, our Code and values remain steadfast. We must keep our momentum and continue winning by doing business ethically, honestly, with integrity, and in full compliance with all laws and regulations.

We all have the responsibility to raise compliance and ethical concerns. Lenovo prohibits retaliation against any employee who, in good faith, seeks guidance or reports a concern.

Lenovo will keep rising, keep winning, and together we will achieve our greatest aspirations. Great companies operate with great integrity. That is my expectation - and that is how we will keep growing, winning and achieving our bold aspirations for many years to come.

Sincerely,

A handwritten signature in black ink, appearing to read 'Yang Yuanqing'.

Yang Yuanqing  
Chairman & CEO  
Lenovo

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# OUR CULTURE AND GUIDING PRINCIPLES

**Lenovo**<sup>™</sup>

# We Are Lenovo

We do what we say.  
We own what we do.  
We wow our customers.  
说到做到，尽心尽力，成就客户。

**Lenovo**



Serving Our Customers  
服务客户



Innovation  
开拓创新



Entrepreneurship  
创业精神



Teamwork with Integrity & Trust  
诚信共赢

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# HOW WE ACT WITH INTEGRITY

## FOLLOW THE LAW, THE CODE AND OUR POLICIES

We behave honestly, by obeying the law, our policies, our Code of Conduct and by always doing the right thing. We do not engage in unfair business practices or illegal activities like fraud, theft, bribery, insider trading or harassment. We never abandon our ethical values for the sake of profits or personal gain.

## MUTUAL RESPECT

We treat each other with fairness, dignity and respect. We value individual differences and the quality of ideas and innovation that come from those differences.

## ACCOUNTABILITY

We honor commitments, deliver on our promises and take responsibility for decisions. We never use a contractor, consultant or other third party to perform any illegal act or violate Lenovo policy.

## COURAGE

We report any situation or action that we believe violates our policies, the Code of Conduct or the law. We never retaliate against those who speak up.

## ETHICAL LEADERSHIP

Regardless of our position or level, we rely on Lenovo's values and Code of Conduct as our guide. We consider the consequences of our decisions on Lenovo's reputation. We avoid conflicts between our personal interests and those of Lenovo.

## COMMITMENT TO CONSUMERS AND COMMUNITIES

We always focus on the needs of consumers, our customers and the communities where we do business.



# INTRODUCTION

At Lenovo, the Code of Conduct (the Code) is the cornerstone of our commitment to conducting business legally, ethically and with integrity. The Code applies to all employees (including full-time, part-time, and supplemental or temporary) of Lenovo Group Limited and its subsidiaries, present and future. We also require all consultants and contractors working for Lenovo to follow the Code in connection with their work for Lenovo.

Any violation of this Code is a serious matter. A breach can put the company, our employees and our products or services at substantial risk. Every employee is accountable for his or her own behavior.

Failure to follow the Code, or violation of the policies described in the Code, can result in disciplinary action, including termination of employment. Failure of any contractor or consultant to follow the Code can result in termination of their relationship with Lenovo.

We must never conceal anyone's failure to comply with the Code, Lenovo policies or the law. We should never ask or allow a third party to act on Lenovo's behalf in any way that would violate the Code, Lenovo policies or the law.

The Code is a starting point, and is not intended to describe every law, policy, procedure or business process that applies to your work at Lenovo. Make sure you know the rules that apply to you.

In addition to following the Code, each of us has an important responsibility to know and follow the laws that apply, wherever we work. If you have questions about the laws that apply to your activities, contact the Legal Department.





# ADDITIONAL MANAGER RESPONSIBILITIES

As a manager at Lenovo, you lead by example, creating a work culture that promotes integrity and reinforces the Code and our supporting policies.

- You will ensure your employees know what is expected of them, are comfortable seeking guidance when they have questions and can raise concerns without fear of retaliation.
- You may never engage in - or allow - retaliation against someone for making a report of suspected misconduct.
- You will ensure that your employees and contractors complete all required ethics training.
- As a manager, you have a special obligation to report and respond to any behavior that you think could violate the law, the Code or our policies.
- If you feel unsure of the answer to an employee's question or concern, contact the resources listed in the Code.



## ETHICS AND COMPLIANCE PROGRAM

Lenovo's Ethics and Compliance Office (ECO) administers Lenovo's ethics and compliance program. The ECO monitors and enforces employee compliance with the Code and Lenovo policies. The ECO also answers employee questions, provides training and policy guidance and serves as a channel for reporting unethical, suspicious or illegal behavior.

## REPORTING CONCERNS AND SEEKING GUIDANCE

You should promptly report any conduct that:

- Seems unethical, illegal or suspicious
- May violate the Code
- May violate any policies or procedures

You can raise concerns at any time with:

- Your manager (provided your manager is not involved in the violation) or another manager you trust
- The Ethics and Compliance Office (ECO) ([ethics@lenovo.com](mailto:ethics@lenovo.com))
- Human Resources
- The **LenovoLine**
- The Legal Department
- In China, you can report misconduct to Lenovo's Independent Commission Against Corruption (ICAC) ([ICAC@lenovo.com](mailto:ICAC@lenovo.com))



# THE LENOVOLINE

The **LenovoLine** allows you to report a concern or ask a question 24 hours a day 7 days a week, either online or by telephone. The LenovoLine is operated by an independent, outside company. Information received through the LenovoLine is referred to Lenovo's ECO. Every report is assessed and taken seriously. The LenovoLine is committed to protecting your confidentiality, to the extent possible. You can raise issues anonymously if you prefer. Although your name is not required to address most concerns, a more thorough investigation can be conducted if you identify yourself.

Due to legal restrictions, anonymous reporting through the LenovoLine is not permitted in certain countries. Some countries also limit the types of issues that can be reported using this resource. If the LenovoLine is not available in your country, please contact one of the other available Lenovo resources. If you have any questions about which resources to use, contact the ECO.

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## Contact the LenovoLine by phone:

To call from the US, dial  
1-800-230-2464

To call from China, dial  
400-120-0213

For dialing instructions from other countries, visit the "Legal" section of Lenovo Central.

<http://lenovocentral.lenovo.com/compliance/lenovoline.shtml>

## Contact the LenovoLine on the website:

To make a report or inquiry using the secure  
LenovoLine website, visit

<https://www.integrity-helpline.com/lenovo.jsp>.



» Q. Why is it important to report misconduct?

A: We all have a responsibility to do the right thing and protect Lenovo's reputation. If you promptly report any suspected violation of the Code, policy or the law, you will help prevent or limit damage to Lenovo.

» Q. What if my culture discourages speaking up?

A: It is not always easy to find the courage to speak up and report a concern, but as an employee or individual working with Lenovo, you are expected and encouraged to do so; it is an essential part of our Code. While cultural norms may vary, our Code and the importance of doing the right thing never varies.

## ATTENTION:

Any of the following statements could be a sign of trouble. If you hear anyone say these things, speak up!

- I know it's against policy, but this is just how things get done here--it's local custom
- It's ok if they [our business partners]--and not us--violate the Code and the law
- It's not my problem; someone else should say something
- No one will find out
- It seems suspicious, but I don't have any proof
- Reporting won't change anything; it would just distract from getting the job done
- We couldn't function or win business if we followed all of the rules; they just slow things down
- Meeting our launch date is more important than following the rules
- The more confidential details I share with others about our new products, the more excitement we can generate

Reach out to your manager, the **LenovoLine**, the ECO, Human Resources or the Legal Department for the right course of action. If you are unsure who to contact, contact the ECO.



## INVESTIGATING AND RESOLVING ISSUES

When necessary, Lenovo will investigate issues raised by employees or others. All employees, contractors and consultants are required to cooperate fully with investigations and audits conducted by Lenovo or governmental authorities. This means providing information, Lenovo-issued equipment such as computers or smartphones, documents and personal interviews. Failure to cooperate, including misleading, lying, destroying or altering documents or records, or failing to respond promptly to requests for information by investigators or auditors is grounds for disciplinary action up to and including termination of employment. Lenovo may report misconduct to the appropriate authorities. Consult the ECO or the Legal Department before responding to non-routine requests for audits, investigations or information from parties outside of Lenovo.

## NO RETALIATION

Lenovo does not tolerate retaliation against any employee, consultant or contractor for reporting an issue or raising a concern he or she believes to be true, cooperating with an investigation or audit, or refusing to participate in activities that violate the Code, laws or company policies. This policy protects anyone who makes a report in good faith, even if he or she is found to be mistaken. Anyone who engages in retaliation will be subject to disciplinary action, including termination of employment. If you believe you were retaliated against, immediately report the matter to the ECO.

» Q. What are some examples of retaliation?

A: Retaliation can take many forms including:

- Demotions
- Undesirable assignments
- Inappropriate performance ratings
- Termination of employment
- Verbal harassment
- Intimidation
- Threats

» Q. I raised a compliance concern about my manager to my local HR Partner. My manager has now started raising issues with my performance that he never raised before. What should I do?

A: Let HR or the ECO know about your concerns, even if you aren't sure. Your concern will be investigated and if you are being retaliated against, action will be taken to protect you.



# OUR EMPLOYEES

## FAIR TREATMENT

We believe in treating each other with respect and dignity. We judge all applicants and employees by their qualifications, demonstrated skills and achievements without regard to race, color, religion, gender, gender identity or expression, national origin, ethnicity, sexual orientation, sex, age, disability, veteran status, marital status or any other characteristic protected by local law. When necessary, Lenovo will provide reasonable accommodations for employees with disabilities or those with special religious requirements. All employees help to create a positive work environment by adhering to these standards.

## DIVERSITY

We are proud to actively promote diversity in our workforce and the workforces of those with whom we do business. We respect and value individuals for their diverse backgrounds, experiences, styles, approaches and ideas. We rely upon diversity to inspire innovation that drives our business, enhance our competitive advantage and serve consumers across the world.

 **COMMITMENT TO  
DIVERSE BUSINESS  
RELATIONSHIPS  
POLICY**



# HARASSMENT-FREE WORKPLACE

Lenovo will not tolerate discrimination or harassment of any individual with whom we have a business, service or professional relationship. This includes discrimination or harassment based on race, color, religion, gender, gender identity or expression, national origin, ethnicity, sexual orientation, sex, age, disability, veteran status, marital status or any other characteristic protected by local law. We do not tolerate unwelcome verbal or physical conduct of a sexual nature. When a co-worker's conduct makes us uncomfortable, we speak out. If we experience or observe workplace harassment, we should report the incident to our manager, any other member of management, HR or the ECO. Lenovo takes harassment claims seriously and will investigate them thoroughly. Employees who engage in harassment, discrimination or inappropriate behavior are subject to disciplinary action, including termination of employment.



**COMMITMENT TO  
DIVERSITY AND  
NON-DISCRIMINATION  
POLICY**

Harassment can be physical, verbal or visual conduct that creates an intimidating, offensive, abusive or hostile environment.

Harassment can take many forms. Some examples of harassing behaviors include:

- Unwanted requests for dates
- Displaying or sharing offensive or pornographic pictures or images
- Unwanted touching
- Offensive or inappropriate language, comments or jokes

Lenovo managers are required by Lenovo and in some cases, by local law, to report any harassment as soon as they become aware of the situation to Human Resources or to the ECO so the issue can be appropriately investigated.

## HEALTH, SAFETY & SECURITY OF EMPLOYEES

We are committed to providing a safe and healthy work environment and preventing accidents. We must observe the safety and health rules and practices that apply to our job and protect ourselves and our coworkers, including immediately reporting accidents, injuries and unsafe conditions.

A safe and secure work environment also means a workplace free from violence. With the exception of Lenovo security personnel and law enforcement, Lenovo prohibits the possession, concealment or use of any firearm or other weapon on Lenovo premises (including parking lots and other outside spaces) or in any location outside the home when conducting Lenovo business. Report any violence, intimidation or threats of violence as soon as possible to Lenovo Security or the Legal Department.

 **RESPONSIBILITY FOR  
EMPLOYEE HEALTH  
AND SAFETY POLICY**

 **WORKPLACE  
VIOLENCE  
POLICY**

## ALCOHOL & SUBSTANCE ABUSE

Lenovo expects employees to report to work able to perform their duties and free from the influence of alcohol, illegal drugs or the abuse of prescribed or over-the-counter drugs. Using, possessing, buying, or selling illegal drugs or abusing controlled substances while on the job, on Lenovo premises, operating Lenovo property (including company vehicles) or engaging in Lenovo business is prohibited and is grounds for disciplinary action, including termination of employment. [Check the policies that apply to your location for additional guidance.](#)



# OUR INVESTORS

## CONFLICTS OF INTEREST

We should avoid situations that may involve a conflict, or even an appearance of a conflict, between our personal interests and Lenovo's legitimate business interests. Immediately disclose any situation that may be or could appear to be, a conflict of interest to your manager and the ECO or Legal Department and remove yourself from any related decision-making process.

When faced with a potential conflict of interest, ask yourself:

- Does this benefit (or could it be perceived to benefit) me, my family or another business, in conflict with Lenovo's legitimate business interests?
- Would this activity, if publicized, harm my reputation, my ability to do my job or embarrass Lenovo?

 **CONFLICTS  
OF INTEREST  
POLICY**





## EXAMPLES OF CONFLICTS OF INTEREST:

- Having an employment, contracting or consulting relationship with a Lenovo competitor, supplier or customer
- Holding a substantial financial interest in a Lenovo competitor, supplier or customer
- Performing non-Lenovo work or soliciting non-Lenovo business while working on Lenovo time
- Using Lenovo assets, including equipment, telephones, materials or proprietary information for unauthorized personal use or outside work
- Accepting any cash, gifts, entertainment or benefits that have more than a nominal value from any competitor, supplier or customer of Lenovo
- Using opportunities discovered through Lenovo employment for personal gain at the expense of Lenovo
- Hiring, managing or supervising a relative or romantic partner
- Awarding Lenovo business to a relative's business



» Q. I took a second job working as an independent contractor for a company that sells various products. Before taking the job, I received approval from my Lenovo manager. I recently learned that the company will start manufacturing components which may be sold to Lenovo or to its competitors. Do I need to disclose this to my Lenovo manager as well?

A: Yes. Even though you did the right thing initially by obtaining approval for the outside employment, the circumstances have changed and now present a potential conflict of interest. You should consult your manager or the ECO.

## OUTSIDE EMPLOYMENT

Any outside business activity must be strictly separate from employment at Lenovo, not compete with Lenovo's interests, and should not harm your job performance at Lenovo. We must follow local Lenovo policies on taking outside employment or participating in outside business ventures. We may not work for or receive payment for services from any third party who interacts with Lenovo, including Lenovo's suppliers, customers, competitors or regulators without prior written approval from management. We may not use Lenovo assets for any outside business activity without prior written approval from management.

## BOARD MEMBERSHIPS

Serving on a board of directors or similar body for an outside business, organization (including trade industry associations and standard-setting boards) or government agency, can also create a conflict of interest and requires advance review by the ECO and approval from Lenovo's management at the level of Vice President or higher. Serving as a director of a publicly traded company or any company that is a supplier to or customer of Lenovo requires the approval of the CEO and General Counsel of Lenovo. Lenovo encourages our employees to be active in their communities and, where appropriate, assume leadership positions in community or non-profit organizations, provided this service does not create a conflict between their duties to Lenovo and their duties to the outside organization.



## FAMILY MEMBERS & CLOSE PERSONAL RELATIONSHIPS

If our family members, romantic partners or people with whom we are in close personal relationships are or may become involved in business activity related to Lenovo, including acting as a Lenovo supplier, customer or vendor, we should immediately disclose the nature of the relationship to management and HR and must remove ourselves from any related decision-making process. If we supervise or are in a position to exercise influence over any aspect of the performance, compensation or advancement of a family member, romantic partner or someone with whom we have a close personal relationship, we must report this relationship to a Human Resources Vice President at Lenovo.



» Q. My brother's wife runs a company that provides cleaning services. Can I be involved in hiring her company to work for Lenovo?

A: No. It creates a conflict of interest between your desire to help your brother's wife and your objectivity in selecting the best company. You should disclose your relationship and remove yourself from the selection process. The cleaning company may then compete for Lenovo's business with other qualified vendors.



» Q. I would like to make a small investment in Dell stock. Any problems?

A: No. Small investments in public companies that compete with Lenovo are fine as long as you are not basing your decision on confidential information learned through your position at Lenovo. If you have questions about whether your investment could cause a conflict, contact the ECO for guidance.

» Q. I'd like to make an investment in my friend's company that competes with Lenovo. The investment will give me 25% of the equity in the business and the ability to influence how the business operates. Any problems with this?

A: Yes, there is a problem. This business competes with Lenovo and your investment in it is likely to cause, or appear to cause, you to act in ways that support your friend's company, which would be harmful to Lenovo's interests.

## PERSONAL INVESTMENTS

Our personal financial investments must not influence, or appear to influence, our independent judgment on behalf of Lenovo. When determining whether a personal investment creates a conflict of interest, consider the relationship between the business of the outside company, Lenovo's business and what you do at Lenovo. Consider whether the company has a business relationship with Lenovo that you can influence and the extent to which the company competes with Lenovo.

If there is any doubt about how an investment might be perceived, disclose it as soon as possible to your manager, the ECO or the Legal Department for guidance.

We are also prohibited from directly or indirectly buying, or otherwise acquiring rights to any property or materials, when we know that Lenovo may be interested in pursuing such an opportunity.



# CONNECTED TRANSACTIONS PROCESS

We must comply with Lenovo's Worldwide Connected Transactions Process. Before contracting or transacting with any external entity or individual (including vendors, suppliers or customers) we must check to determine if the individual or entity is included on Lenovo's List of Connected Persons. If an entity or individual is on the list, you must immediately report the transaction to Lenovo's Company Secretary Office before committing or entering into the contract or agreement.

 **LENOVO WORLDWIDE  
CONNECTED TRANSACTIONS  
PROCESS**



# ACCURACY OF BUSINESS RECORDS

Investors count on Lenovo to provide shareholders with accurate, timely and understandable information about the company's financial condition. We rely on every employee to ensure that all books, records and accounts conform both to required accounting principles and to Lenovo's system of internal controls. We must never conceal or falsify any Lenovo business records.

All business records and communications should be clear, truthful and accurate. Our communications must avoid exaggeration, guesswork and insulting remarks or characterizations of people and companies. We should not include judgments about the law or any potential legal liability in our communications unless we have been authorized to do so by the Legal Department.

Business records must be retained and destroyed according to Lenovo's record retention policy unless directed differently by the Legal Department.

Contact your manager, Internal Audit, the ECO, or the Legal Department or make a confidential report through the [LenovoLine](#), immediately, if you suspect that:

- Any Lenovo book, record or account has been falsified or improperly altered or destroyed or
- Improper or illegal action has been taken related to accounting or financial reporting

» Q. You tried hard to close a big sale before the end of the quarter. Unfortunately, the customer was on vacation and did not accept or sign the contract until after the quarter had ended. Your manager wants your team to meet its numbers and asked you to date the paperwork back to last quarter. Should you do this?

A: Definitely not. It is improper to record false sales or false dates. Dates, costs and revenues must be recorded accurately in the proper time period. If a sale is not yet final, it should not be recorded as final.

## Did you know?

Business records include financial books, records, accounts, receipts, expense reports, texts, emails, notes, time cards and quality, safety and personnel records. They may even include your posts on social media.



» Q. Does Lenovo's Insider Trading Policy apply to buying or selling stock in other companies?

A: Yes. For example, let's say you learn during discussions about a new hardware purchase that a customer plans a major expansion. If you purchase stock in the customer's company, share this information with a friend or tell the friend to buy stock in the company, it could be insider trading.

## INSIDER INFORMATION & SECURITIES TRADING

In the course of our employment with Lenovo, we may learn non-public information (also called "inside information") about Lenovo or other companies, including our customers, suppliers or business partners. In some cases, if this confidential information became public, it could affect the price of Lenovo's or another company's stock. The use or sharing of such non-public information about Lenovo or another company for your or another's benefit is called "insider trading."

All Lenovo employees are prohibited from engaging in insider trading, even if you will not financially benefit from the information being shared. Engaging in insider trading can hurt Lenovo and Lenovo's shareholders and may also subject you to civil and criminal penalties.

 **CONTINUOUS  
DISCLOSURE POLICY**

 **PRACTICAL GUIDANCE  
ON THE OPERATION  
OF THE CONTINUOUS  
DISCLOSURE POLICY**

 **TRADING IN  
SECURITIES POLICY**





# AUTHORITY TO MAKE LENOVO COMMITMENTS

Lenovo's management system, contracting processes and delegations of authority are designed to provide the appropriate controls needed for Lenovo to run our business effectively, comply with laws and protect Lenovo from waste, fraud and abuse.

We must keep to the limits of our authority to act on behalf of Lenovo and must not take any action to exceed or avoid those limits. These delegations of authority set out the rules for which organizations and line management have authority to approve pricing and certain other contract terms and conditions.

You are not allowed to make oral or written business commitments outside of these processes, such as side deals. In addition, all commitments must be visible to Lenovo Accounting to ensure the accuracy of Lenovo's books and records.



## DELEGATION OF AUTHORITY POLICY

» Q. Can I split purchase orders in order to avoid delegation of authority limits or speed up the approval process if I'm just trying to help the Company operate faster?

A: No. We must accurately record each of our business transactions. No Lenovo entry should be made to conceal or disguise the true nature of a transaction regardless of your reasoning.



# PROTECTING COMPANY ASSETS

We have a responsibility to protect any Lenovo asset entrusted to us from loss, damage, misuse or theft. Examples of company assets include:

- Physical assets like our products, facilities, equipment, computers and communications systems
- Financial assets such as funds, credit cards or bank accounts
- Lenovo's intellectual property including our trademarks, copyrights and patents
- Lenovo proprietary information such as trade secrets, "know how," prototypes, internal and external communications, digital information, hard copy documents, oral discussions and interactions via social media channels
- Customer, consumer, supplier and employee personal information

Lenovo's physical and information security policies protect our assets from theft, loss, damage or misuse. If there is theft, loss, damage or misuse of company assets, we are responsible for immediately reporting the occurrence to the Corporate Security Department.

We must never use company assets or funds for purposes which violate the law or applicable policies or procedures. We must not use any Lenovo intellectual property without proper authorization. We should never use company assets to create, store or send content that is illegal or which others might find offensive. If we leave Lenovo for any reason, we must return all Lenovo assets.

» Q. I have a side business that has been vetted and approved by Lenovo management. Can I use my Lenovo-issued computer to complete certain tasks related to my side business outside of my Lenovo work hours?

A: No, you may not use Lenovo assets, including your Lenovo-issued computer, to further outside business ventures.



## LENOVO INFORMATION & COMMUNICATION SYSTEMS

Lenovo's information and communication systems, including telephones and connections to the Internet, are vital to Lenovo's business and should only be used for appropriate business-related purposes. We may use them for conducting Lenovo business or for other incidental purposes authorized by our management such as occasional personal use of the telephone, email and the Internet that does not interfere with company work. We may not use Lenovo systems to visit Internet sites that feature sexual content, gambling or that advocate intolerance of others. We also may not use them in a manner that interferes with anyone's productivity.

» Q. I sometimes send emails to my spouse and friends to make personal plans. May I use my Lenovo computer to do this?

A: Yes, as long as any personal use is infrequent and does not interfere with your or your co-workers' job performance. Remember, Lenovo has the right to monitor its email systems, so you may prefer to use your personal email for non-work related communications.



# PRIVACY & DATA PROTECTION

Lenovo respects the privacy of our customers, consumers and employees consistent with privacy and data protection laws and Lenovo privacy policies. Our customers, consumers and others must be able to trust that we will only collect, store, share and use their personal information for defined legitimate business purposes and to support and enhance our relationships with them. We do not sell our consumers' or customers' personal information. We appropriately safeguard our consumers' and customers' information and comply with internal policies and applicable laws.

In addition, we protect and appropriately use the personal information of our employees consistent with all legal requirements. However, employees are advised that workspace and items provided to us by Lenovo, including computers, email systems and telephone voice mail, are the property of Lenovo. Therefore, Lenovo management reserves the right to access, review the contents of files, desks and lockers, and monitor telephone and computer systems, consistent with the law, this Code, and any other applicable Lenovo policies.

If you believe that customer, consumer or employee data is being compromised, contact the Legal Department, the ECO or make a report using the [LenovoLine](#).



» Q. My team is working on launching a new software experience for our tablet products that will really improve the consumer's experience. However, to enable that experience, it must collect some user data, including personal information. How do I make sure this software complies with Lenovo's privacy standards and legal requirements?

A: Protecting consumers' privacy and security aren't simply legal requirements—they are part of our Core Values of trustworthiness and integrity. When developing, launching, marketing and supporting our products, we must determine how any user data collection may impact our consumers' privacy rights, their trust in our brand, and our responsibilities (and those of our vendors and partners) to appropriately use and safeguard user data. Contact the Legal Department, the Product Security Team or Information Security for more information on how to make sure we are protecting consumer privacy and security.

# LENOVO INTELLECTUAL PROPERTY RIGHTS

Business opportunities and inventions developed through work belong first to Lenovo, except as otherwise agreed by Lenovo. Developing or helping to develop inventions or other intellectual property, during or after work hours, that: 1) relate to Lenovo's existing or reasonably anticipated products or services, 2) relate to your position at Lenovo or 3) are developed using Lenovo's corporate resources, are subject to the provisions of your employee agreements. Ownership of patents remains with Lenovo even after we leave Lenovo.



# LENOVO CONFIDENTIAL & RESTRICTED INFORMATION

Keeping Lenovo's confidential and restricted information secret gives us an important competitive advantage in the marketplace. Lenovo's confidential or restricted information includes information about Lenovo that is not generally known to the public and information that business partners, customers, suppliers and vendors have entrusted to us.

Unauthorized access, disclosure, loss or use of confidential or restricted information can seriously harm Lenovo, as well as our suppliers, consumers, customers and employees. We must safeguard sensitive information by marking it appropriately, keeping it secure and limiting access to those who have a specific need to know to do their jobs, even within Lenovo. These obligations continue even after employment or assignment ends. You may not take paper files or electronic media containing confidential and restricted information if you leave the company for any reason. You may not make copies of confidential or restricted information unless you are specifically authorized to do so.

Sometimes we need to share confidential information with people outside the company, for example, to work effectively with a commercial business partner. In such instances, check with your manager before you share any information. We should make sure a valid non-disclosure agreement is in place before we share any information, and we should limit the information as much as possible. Consult the applicable non-disclosure agreement and contact your manager or the Legal Department for help.

Just as we protect our own confidential or restricted information, Lenovo respects and confidential or restricted information of others, including our employees, consumers, customers, suppliers and other third parties. We may only use, copy or disclose third-party information in compliance with a valid non-disclosure agreement.

» Q. My manager has asked me to prepare our department's budget, which means that I will need to get information about the salaries of some of my colleagues. May I also get information about the salaries of other coworkers in other departments or comment to a co-worker about his or her salary?

A: Absolutely not. While preparing a detailed budget presents a legitimate business need to obtain certain confidential employee information, you must keep this information confidential and share it only with those who have a business need to know it. You must not use the project as an opportunity to view, share or comment on sensitive and confidential information about other employees.



Avoid Inadvertent Disclosure—Be careful as you may disclose non-public information and secrets without realizing it. You could be overheard in a public place or someone could see your computer or phone screen without your knowledge. Avoid discussing confidential information in airplanes, buses, trains, taxis, airports, restaurants, restrooms, elevators and company common areas. Even small pieces of information may be pieced together to form a complete picture.

Employees attending conferences, symposiums and industry events should use caution when interacting with industry colleagues. Even sharing information with family and friends on projects and assignments may present a breach of confidentiality.

 **INFORMATION  
SECURITY  
POLICY**

 **CLASSIFICATION  
OF LENOVO  
INFORMATION**

## Did you know?

Much of the information we use every day in our jobs at Lenovo is confidential and must be protected. Here are some examples:

- Research and technical data
- Business plans or strategies
- Customer lists
- Contracts with customers
- Vendor or supplier internal information
- Commodity and product volumes
- Current projects
- Human Resources data
- Financial results and projections
- Future or unreleased products (prototypes)
- Product roadmaps and development plans
- Undisclosed product specifications
- Inventions or trade secrets
- Information concerning potential acquisitions
- Data collected from consumers or from active devices in the field



# THE MARKETPLACE

## GIFTS, ENTERTAINMENT, CORPORATE HOSPITALITY & TRAVEL

Our relationships with suppliers, customer and others must be based entirely on sound business decisions and fair dealing. Business gifts, entertainment and corporate hospitality can help build relationships, but they can also make it harder to be objective about the person or company providing them. We may never:

- Solicit, offer, accept or provide any gifts, entertainment, corporate hospitality or travel if it will obligate or appear to obligate the person who receives it.
- Solicit, offer, accept or provide to anyone cash or cash equivalents, lavish or frequent gifts or entertainment, or anything that might look like a bribe.
- Provide or accept sexually-oriented gifts or entertainment.



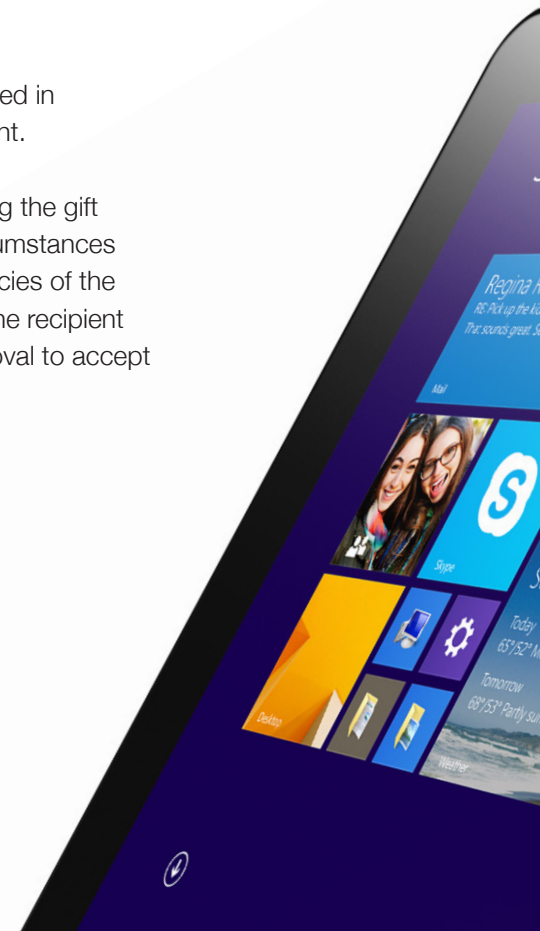
### GIFT, ENTERTAINMENT, CORPORATE HOSPITALITY AND TRAVEL POLICY



# GIVING & RECEIVING GIFTS

Lenovo employees, consultants or contractors may not offer gifts to, or receive gifts from, our suppliers, customers or other business-related entities unless all of the following four conditions as well as the conditions of the Global Gift, Entertainment, Corporate Hospitality and Travel Policy are met:

1. Moderate value. This value varies by country. An inexpensive courtesy gift such as a promotional item has a “moderate value” anywhere. Check the Global Gift, Entertainment, Corporate Hospitality and Travel Policy or contact the ECO for guidance on what gifts may be accepted or provided.
2. Customary and appropriate. The item is considered a customary and appropriate business gift in the country where it is offered and offering or accepting it would not reflect poorly on Lenovo if the details were made public.
3. No favored treatment. The gift is not offered in expectation of special or favored treatment.
4. Legal and approved. Offering or accepting the gift is legal in the location and under the circumstances where given and does not violate the policies of the giver or the recipient, and the giver and the recipient have both received the appropriate approval to accept the gift.



» Q. One of our suppliers that is currently negotiating the renewal of a large contract with Lenovo has offered me two tickets to the World Cup. Can I accept them?

A: It depends. In this situation, it could be perceived that the tickets were offered as a bribe to secure the outcome of the contract renewal, so you should not accept the tickets. If we were not in the middle of negotiations with the supplier, we should seek out approval from our direct manager before accepting the tickets. Gifts or entertainment above certain limits may also have additional approvals required. Consult the Global Gift, Entertainment, Corporate Hospitality and Travel Policy or contact the ECO for guidance.

## ENTERTAINMENT & TRAVEL

With appropriate approval, you may give or accept customary entertainment or business courtesies, such as meals, provided the expenses are reasonable and are not prohibited by law or by either party's policies or standards of conduct. You must receive pre-approval from your manager before accepting any travel from or providing any travel to any customers, suppliers, vendors or other third parties.



## PROVIDING GIFTS, ENTERTAINMENT OR TRAVEL TO GOVERNMENT OFFICIALS OR EMPLOYEES

Laws concerning providing gifts, hospitality and travel to government officials (which include executives and employees of government-owned corporations, newspapers, television stations, universities and other entities affiliated with governments, and public international organizations like the U.N.) are complex and can vary from country to country. In many cases, it is illegal and improper to provide gifts to government officials. We need to take special care in this highly regulated area, as Lenovo wishes to avoid even the appearance of impropriety. No gift or business courtesy may be provided to a government official or employee unless the four conditions on page 33 are met and only if allowed under the Lenovo Global Gift, Entertainment, Corporate Hospitality and Travel Policy.

Contact the ECO, the Legal Department or Government Affairs for guidance about the rules that apply in your area.

If you are offered cash or cash equivalents, or a gift that has more than nominal value or which is not customarily offered to others, tell your manager immediately. Appropriate arrangements will be made to return or dispose of what has been received and the supplier or customer will be reminded of Lenovo's gift policy.

"Gifts" can be anything of value, including tangible items, services, meals, entertainment, hospitality, transportation, use of vacation facilities, home improvements, membership fees or dues, tickets, internships, discounts, charitable donations, offers of employment and gift certificates. The list of things that might be considered a gift is endless. An extravagant or expensive gift or extravagant entertainment should not be accepted, regardless of the effect it will have on your business judgment. Consult your manager, the ECO or the Legal Department with questions.



# ANTI-CORRUPTION LAWS & BRIBERY

We comply with the anti-corruption treaties and laws of the countries in which we do business. We will not directly or indirectly offer or give anything of value to any person, including to government officials, to influence official action or to secure an improper advantage as defined by applicable laws. “Government officials” include any government employee; candidate for public office; or employee of government-owned or controlled companies, public international organizations or political parties. Anything of value includes cash or cash equivalents, gifts, meals, travel, political or charitable contributions and job offers for government officials’ relatives. These requirements apply both to Lenovo employees and representatives and to our channel partners, agents or other third parties working on Lenovo’s behalf no matter where they are doing business.

No Lenovo employee or representative will suffer any retaliation for refusing to pay or take a bribe or kickback, even if this results in a loss of business to Lenovo.

Lenovo prohibits making any direct payments of any size to government officials, either directly or through a third party, including to expedite routine non-discretionary government actions including 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.



» Q. A government employee suggested that he would strongly encourage his employer to award us a contract if a “donation” is made to one of his manager’s favorite charities. What should I do?

A: Do not agree to the request as it is most likely a request for a bribe. Any suggestion or request for funds that is not defined for an appropriate business purpose, including charitable donations, may be used improperly as a bribe. End the conversation and immediately report the matter to ECO or the Legal Department.

» Q. My manager wants to give a gift to an official who participated in an event at our factory. Is that acceptable?

A: It depends on the gift. In some cases, you may provide a gift of nominal value, such as a token with the Lenovo logo to an official, but you must make sure that any gifts comply with Lenovo’s Code of Conduct and Gift, Entertainment, Corporate Hospitality and Travel policy. We must be very careful in this area as gifts to government employees/officials create a high risk for the company and may be seen as a bribe.



» Q. I am told that government approvals cannot be obtained in some countries without making a payment to a government official. Is it permissible to hire a consultant to help with government approvals, and simply not ask him where the money goes?

A: No. There is nothing improper about using consultants but the law prohibits bribery payments made directly or indirectly. You cannot allow third parties to make improper payments for Lenovo, and you should always know what a consultant is doing on Lenovo's behalf.

## GOVERNMENT CUSTOMERS

Many governments around the world have laws, regulations and contractual requirements that apply to the purchase of products from private suppliers like Lenovo. These laws are intended to ensure that governmental entities can buy products and services at competitive prices and to protect against attempts to improperly influence the bid process. Lenovo must comply with all applicable procurement laws, rules and contractual requirements when selling products to government entities—which may include schools, hospitals and other entities in addition to government agencies. Be familiar with local laws, regulations and Lenovo guidelines applicable to government sales in your geography. If you need guidance, consult the Legal Department.



# PRODUCT & QUALITY SERVICE

Lenovo is committed to quality and achieving consumer satisfaction by delivering superior products and experiences.



## REPRESENTATIONS REGARDING LENOVO PRODUCTS

We must ensure that all representations we or our agents make about Lenovo products and services, such as about speed, battery life and durability are truthful and accurate. This includes representations made in marketing or product literature, verbally, on the Internet, in social media or sales presentations. We must never make deliberately misleading or false claims about Lenovo's or our competitors' products, and when commenting about our products on social media, **we should never misrepresent our affiliation with Lenovo, and where required by law, we should disclose that we are employees of Lenovo.**



## TREATING OUR BUSINESS PARTNERS WITH INTEGRITY

We treat consumers, customers, competitors and suppliers fairly in all of our activities. We will not manipulate or abuse confidential information. We base our decisions on legitimate business-related criteria, not on personal relationships or interests. In deciding among competing suppliers of any size, we should weigh the facts honestly and impartially and follow Lenovo's procurement process. We seek to do business with organizations that comply with applicable laws and follow principles consistent with the ones in this Code.



# EXTERNAL COMMUNICATIONS/ MEDIA RELATIONS

We will not make statements to the news media on Lenovo's behalf, or provide company information to outside parties, without authorization. Good judgment and common sense must always be used when posting on social media outlets. Remember, once a statement is posted, it cannot be retracted. Consider how the public will view your comments. Review Lenovo's Social Media Guidelines on [lenovocentral.com](http://lenovocentral.com). Contact the Legal Department or Corporate Communications with questions.



- Communications with journalists and the media are only managed by Lenovo Communications.
- Communications with securities or financial analysts and with shareholders are only managed by Lenovo Investor Relations.
- Communications with outside lawyers and law enforcement are only managed by Lenovo's Legal Department or Corporate Security.



# PROTECTING INFORMATION & INTELLECTUAL PROPERTY BELONGING TO OTHERS

While we can gather information available in the general marketplace, we may not use any illegal or improper means to acquire a competitor's trade secrets or other confidential or competitive information. Improper solicitation or intelligence-gathering could subject you or Lenovo to civil and criminal legal penalties. Employees joining Lenovo after having worked for any other company may not share any of the other company's trade secrets or other confidential information with Lenovo.

If we obtain information that may constitute a trade secret or confidential information of another business, even by mistake, or if we have questions about the legality of information gathering, we must consult the ECO or the Legal Department.

Materials we use every day are protected by copyright law, including software, books, audio and video files, trade journals and magazines. At Lenovo, we respect and work to protect others' copyrights and do not copy, alter or distribute copyrighted material without the permission of the copyright owner. If you acquire software for your personal use, do not copy any part of such software in any work you do for Lenovo, nor should we place such software on any Lenovo-owned computer system or other Lenovo property.



» Q. Lenovo just hired a sales manager from one of our competitors. He knows their product and sales road map for the next year. If he shares this information, can we adjust our plan to compete accordingly?

A: No. We may not ask new employees to share confidential information belonging to their previous employer, and they certainly should not provide it.

# FAIR COMPETITION

As a global corporate citizen, Lenovo is responsible for complying with what are called “antitrust” or “competition” laws. Under these laws, agreements among competitors that restrict trade or price competition are illegal.

Lenovo employees must maintain independence of judgment and action in designing, producing, pricing and selling our products and services and must avoid even the appearance of colluding or making an agreement with a competitor. Local laws may vary, but the following principles apply everywhere Lenovo does business.

» Q. At a recent conference, I met an old friend who is now vice president for a competitor. During the conversation, he volunteered some information about their pricing strategy and future pricing trends. I quickly told him this was an inappropriate conversation and walked away, and then left a voicemail for my contact in the Lenovo Legal Department. Was I overreacting?

A: You did the right thing. If you find yourself in a meeting where competitors are discussing pricing strategy, you should leave immediately and contact the Legal Department immediately about what happened. Even if you don't use the information, there may be a perception that you are participating in activities prohibited by competition laws, which can create legal issues for you or Lenovo.

## **Do not make agreements with competitors**

No employee should enter into an agreement or discussion with any competitor that would set prices, limit the availability on the market of goods or services or agree to boycott a customer or supplier.

## **Avoid sharing competitively sensitive information**

Employees should not discuss any competitive information with a competitor including: prices or discounts; terms of sale including credit, profits, profit margins or costs; allocation of customers or markets; boycotts; customers; suppliers; market share; distribution practices; bids or intents to bid; sales territories or markets; selection, classification, rejection or termination of customers.

## **Do not make false or deceptive comments regarding competitors**

We must ensure that our statements about Lenovo's competitors are based upon current, accurate, complete and relevant data. To avoid even the appearance of impropriety, we do not comment on another company's business reputation or financial or legal problems.

## **Be careful when entering pricing agreements with resellers**

Setting or attempting to influence resellers' prices or margins may violate competition laws. Seek advice from the Legal Department for guidance specific to your region. If you have questions with regard to any of these guidelines contact the Legal Department.



» Q. A supplier has asked me to put a low value on a shipping invoice so that the supplier doesn't have to pay duties. Since we didn't buy the equipment and Lenovo won't be the importer, does it matter what value is used?

A: You must always list the accurate values on any documents or records, including shipping invoices. You must never falsify invoices for any reason, including lowering or circumventing customs' duties, fees or charges or for expediting transit times. If you have questions about what to do, contact Global Trade Regulation in the Legal Department.

» Q. If an employee carries a product in his briefcase to deliver to another Lenovo employee in another country, does that mean the product will be "imported" and does it require special consideration?

A: Yes, any product that is not for your personal use is subject to the relevant import/export requirements and procedures. Seek guidance from Global Trade Regulation in the Legal Department.

## IMPORT & EXPORT CONTROLS

We comply with all applicable import and export laws, regulations, and restrictions. Import and export laws apply to:

- Products, services, information, technology, payments for goods or services, countries or third parties (including people) we do business with.
- Technical data relating to the design, production and use of products or services.

When we travel internationally on company business, we, and the items we carry with us, are subject to laws governing what we import and export. Employees are responsible for knowing the laws that pertain to them. When in doubt, employees should contact Global Trade Regulation in the Legal Department.



# COMMUNITY & SOCIETY

## THE ENVIRONMENT

We are committed to promoting and maintaining environmentally responsible manufacturing and other business practices for the benefit of our customers, consumers, employees and the communities in which we operate. We strive for continual improvement by developing specific programs that address the environmental cost and impact of our activities, products and services.



**ENVIRONMENTAL  
AFFAIRS  
POLICY**



**LENOVO  
SUSTAINABILITY  
REPORTS**



## POLITICAL PROCESS

As a global business, Lenovo maintains good relationships with governments around the world and strives to be a good corporate citizen everywhere we operate. Lenovo Government Relations is responsible for coordinating Lenovo's communications, lobbying and other interactions with government officials and policy makers. Lenovo employees should not lobby, communicate with public officials on policy matters, make political contributions, provide equipment or services or engage in political activities on Lenovo's behalf except in accordance with applicable law or policy and in coordination with Lenovo Government Relations. Of course, you may participate in political activities on an individual basis, with your own resources, and on your own time.

For additional information or guidance, please contact the Legal Department or Government Relations.



**GOVERNMENT RELATIONS, POLITICAL CONTRIBUTIONS, AND PARTICIPATION IN POLITICS**

## ANTI-MONEY LAUNDERING

Money laundering is a process designed to conceal an illegal source of money to make it appear legitimate. Lenovo will not directly or indirectly participate in such practices. Use good judgment when dealing with customers or business partners, and immediately report any unusual or suspicious activities including large payments in cash, arrangements for payment to be made by someone not involved in the transaction and payments made from unusual sources and in different currencies than those provided for in a contract. Direct any questions or concerns to the ECO or Legal Department.

## COMMITMENT TO HUMAN RIGHTS

Lenovo is committed to respecting human rights and conducting business legally, ethically and with integrity. As part of this commitment, Lenovo operates with respect to the universal human rights identified in the UN Declaration on Human Rights and in accordance with the UN Global Compact. Lenovo does not permit the use of child labor, forced labor or physical punishment in any Lenovo operations.

 **HUMAN RIGHTS  
POLICY**

## COMMITMENT TO COMMUNITY

We are proud of Lenovo's contributions to the quality of life and culture as well as the economic and social development of the communities where we do business. Lenovo encourages each of our facilities to become actively involved in their community by sponsoring and participating in initiatives that contribute to a better quality of life. Lenovo strongly encourages our employees to support this goal by volunteering and participating in charitable and community activities as well as professional development associations.

When engaging in community activities, we may encounter situations covered by the Code. For example, we should follow the guidance regarding "conflicts of interests" and may not use Lenovo resources for any outside activities without permission. When we participate in an activity that Lenovo does not sponsor, we should not imply the company's support without the appropriate authorization.

» Q. A large charitable organization recently purchased some computers from Lenovo. As the sales manager, can I show my appreciation by making a donation from my sales budget?

A: Charitable contributions that are linked to sales or potential sales could hurt Lenovo's reputation and are improper. Lenovo's charitable contributions should be determined based on the organization's need, Lenovo's ability to help and a number of other factors. For further guidance, contact the Government Relations Department, Legal Department or ECO.



## WHERE TO GO FOR HELP

We work hard to foster an environment of open, honest communication. If you have a concern related to the Code or about a legal, compliance or business conduct issue, you have several options. What matters most is that you ask the question or raise the concern. Confidentiality will be maintained to the extent possible, given the company's need to investigate and resolve the issue raised and to comply with the law. You can speak with:

- Your manager (or another manager you trust)
- The Lenovo ECO ([ethics@lenovo.com](mailto:ethics@lenovo.com))
- Human Resources
- Lenovo Legal Department
- Lenovo Internal Audit
- The **LenovoLine**
- In China, you can report misconduct to Lenovo's Independent Commission Against Corruption ([ICAC@lenovo.com](mailto:ICAC@lenovo.com))

## NO RETALIATION

If you seek advice, raise a concern relating to a potential compliance issue, or report suspected misconduct in good faith, you are doing the right thing. We strongly encourage such actions. Lenovo will not tolerate retaliation against you. Anyone engaging in retaliation will be subject to disciplinary action including termination of employment.

