

<b>Type:</b> Global Policy	<b>Category:</b> Corporate Policy
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# Lenovo Whistleblowing and Investigations Policy

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## 1. Principles

- 1.1 Lenovo Group Limited (including all of its subsidiaries present and future, hereinafter “Lenovo” or the “Company”) is committed to maintaining high standards of openness, transparency, probity and accountability. The Company strongly encourages and expects all employees (including full-time, part-time, temporary and supplemental), as well as contractors and consultants who perform work on Lenovo’s behalf, to report concerns and actual or suspected conduct that seem unethical, illegal, suspicious or that may violate Lenovo’s Code of Conduct, policies or procedures, including misconduct, malpractice or improprieties by any employee and/or external parties in any matter relating to the Company.
- 1.2 Employees of the Company at all levels should conduct themselves with integrity, impartiality and honesty.
- 1.3 If and when appropriate, Lenovo will conduct an internal investigation to determine whether specific behavior is consistent with applicable laws and Lenovo standards. This Policy applies to all Lenovo internal investigations.

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## 2. Purpose

- 2.1 This Whistleblowing and Investigations Policy (this “Policy”) aims to complement Lenovo’s Code of Conduct and to govern, deal with and address fair and proper concerns raised by Whistleblowers (as defined below) and actual or suspected conduct reported by them that seem unethical, illegal, suspicious or that may violate Lenovo’s Code of Conduct, policies or procedures, including misconduct, malpractice or improprieties by any employee and/or external parties in any matter relating to the Company. It also provides guidance with respect to the way internal investigations will be conducted by the Company.

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## 3. Definitions and Scope

- 3.1 Whistleblowers (each a “Whistleblower”) may include: (1) employees of the Company; (2) business counterparts of the Company, including but not limited to (a) vendors of goods or services to the Company (including their employees); (b) customers of the Company (including their employees); and (3) consultants and contractors to the Company (including their employees).
- 3.2 This Policy applies, but is not limited to, concerns about possible improprieties in financial reporting, internal controls or other matters within the Company including, but not limited to, the following:
  - violation of Lenovo’s Code of Conduct or other rules of conduct, policies or procedures applicable within the Company;
  - breach of applicable laws and/or legal or regulatory requirements;
  - criminal offenses, breach of civil law and miscarriage of justice;
  - malpractice, impropriety or fraud relating to accounting, auditing, financial matters and internal controls;
  - misuse of or leakage of Lenovo or third-party confidential or proprietary information;
  - endangerment of the health and safety of an individual;
  - damage caused to the environment;
  - conduct involving bribery or corruption, money laundering and terrorist financing;
  - harassment or discrimination;

- breach of privacy and security of network and information systems;
- improper conduct or unethical behavior likely to prejudice the standing of the Company; and
- deliberate concealment of any of the above, which may implicate any employee at all levels and divisions of the Company, or any external parties related to the Company.

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## 4. Reporting Mechanisms

- 4.1 Reporting Mechanisms: Lenovo's Code of Conduct provides various means by which a Whistleblower may raise concerns. These include:
- the manager of an employee raising an issue (or another trusted manager);
  - the Lenovo Ethics and Compliance Office (ECO) ([ethics@lenovo.com](mailto:ethics@lenovo.com));
  - the Lenovo Human Resources Department;
  - the Lenovo Legal Department;
  - the Lenovo Internal Audit Department;
  - the LenovoLine (<https://www.integrity-helpline.com/lenovo.jsp>); and
  - in China Lenovo's Independent Commission Against Corruption ([ICAC@lenovo.com](mailto:ICAC@lenovo.com)).
- 4.2 Any Whistleblower who has a legitimate concern about improprieties in financial reporting, internal controls or other matters within the Company (such as those described in paragraph 3.2 above) can raise it in confidence.
- 4.3 A report made by the Whistleblower should, to the extent possible, be in writing and include specific, accurate and relevant information in relation to the activity(ies) and person(s) involved so that, if appropriate, an investigation can be undertaken into the concern raised, including the identity of the Whistleblower. Whistleblowers are however able to submit reports orally and/or in person via the methods, persons, or departments listed in paragraph 4.1.
- 4.4 The Company does not encourage anonymous reporting since it will be difficult for the Company to follow up and obtain further information to make a proper assessment. However, the Company will accept anonymous reporting, where legally permissible, and in the circumstances where a Whistleblower has made an anonymous report, a means of contact (such as an anonymous email address) should be provided to facilitate the initial assessment (and subsequent investigation) of the report. There may be limitations on the extent of any investigation if anonymity is maintained throughout any investigation.
- 4.5 Any concern should be initially reported via one of the methods described in paragraph 4.1 above. The concern will be logged into the investigations system of record and processed via the established Lenovo Investigation Oversight Committee (IOC) procedure for processing and investigating such concerns. The IOC will, after gathering sufficient details, assign the complaint to the appropriate group within the IOC for further action based on IOC processes, guidelines and policies. The Internal Audit team will report on cases at each meeting of the Audit Committee of the Board of Directors (the "Audit Committee").
- 4.6 If the concern involves the ECO of the Company, or the Whistleblower believes that it would not be otherwise appropriate to use one of the methods described in paragraph 4.1 above, the Whistleblower may raise the concern directly to the Audit Committee by submitting it to the Lenovo Company Secretary. The Audit Committee will consider the report made to it by the Whistleblower (directly or indirectly through the IOC of the Company) and decide on the appropriate investigation arrangement.
- 4.7 The Company will acknowledge the receipt of the report from the Whistleblower within the timeframe anticipated by the respective applicable local laws and regulations (usually within several business days) in order to ensure the Whistleblower that his/her report has been received and is being processed.

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## 5. Investigation Procedures

- 5.1 The IOC establishes and maintains the internal investigations processes, guidelines and policies and is responsible for reasonably assuring internal investigations comply with these standards. Generally, investigations will be based on IOC processes, guidelines and policies. Depending upon the particular circumstances of a complaint, a separate investigation process may be followed as authorized by the Audit Committee or the IOC to investigate the matter in a timely and fair manner.
- 5.2 The format and the length of an investigation will vary depending upon the nature, complexity and particular circumstances of each complaint made. Resources are not required to be allocated to investigate allegations that were previously reviewed if there is no new material information, new material information is not provided in good faith, or new information is determined to be inconsequential.
- 5.3 Internal investigations may be conducted by assigned Lenovo personnel, or independent attorneys, accountants, investigators, or other third parties that are retained to conduct or assist in an investigation.
- 5.4 A Whistleblower who reports a concern may be asked to provide more information during the course of the investigation.
- 5.5 If IOC processes, guidelines or policies require the filing of a final report, it should be included in the investigations system of record. Depending on the particular circumstances of the complaint, a final report, with recommendations for change or improvement (if any), may be produced to the Audit Committee. The Audit Committee will then review the final report and if appropriate, make recommendations to the Board.
- 5.6 Subject to the terms of this Policy and limitations under applicable laws, the Whistleblower who reports the concern will be advised of the outcome of the investigation. Except as otherwise required by applicable laws, the IOC retains full discretion regarding the extent of information provided to the Whistleblower regarding the investigation.
- 5.7 The internal investigation conducted by the Company should not jeopardize any future investigation by a law enforcement agency. If, after having considered the facts available, the Company is of the opinion that a criminal offence has been committed, it will seek legal advice to determine if it is necessary or appropriate to, and if so, it will, refer the matter to the appropriate law enforcement agency. Once the matter is referred to a law enforcement agency, the Company may not be able to take further action on the matter, including notifying the Whistleblower of the referral.
- 5.8 Auditable records of all reports made by Whistleblowers, the corresponding investigations or follow-up actions taken and the outcome of investigations should be kept by the ECO of the Company in the investigations system of record or other appropriate repository.
- 5.9 The Company will ensure impartiality and competence of the personnel managing the reporting channels and handling the report. The respective workforce will be provided with appropriate information on the existence and proper usage of reporting channels.
- 5.10 The Company should respond to and follow up on reports within the timeframe anticipated by the respective local laws and regulations.

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## 6. Cooperation by Employees

- 6.1 All employees (full-time, part-time, supplemental, and temporary), consultants and contractors are required to cooperate fully with investigations and audits conducted by Lenovo. This may mean providing access to Lenovo-issued equipment (such as computers or smartphones), documents and participating in interviews.

- 6.2 Failure to cooperate in the investigative process, 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.
- 6.3 If an employee is contacted by a third-party related to a request for information by an outside or independent audit, investigation or regulatory agency, the employee must notify either Ethics and Compliance or the Legal Department as soon as possible, and in any event before responding to any inquiries by the third-party. In situations where advance notification is not possible, the employee must contact Ethics and Compliance or the Legal Department as soon as possible.

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## 7. Confidentiality and Retaliation

- 7.1 The Company will make every effort to treat all reporting under this Policy in a strictly confidential manner. The identity of the Whistleblower making the report or complaint will not be disclosed without such Whistleblower's consent, unless the Company is required to do so under applicable laws or regulations, for the purpose of the Company obtaining legal advice or legal representation, or as otherwise consistent with an effective investigation of the report or complaint. The Company will maintain such confidentiality also for the person named in the report or complaint, as well as for any third parties referenced.
- 7.2 All reporting under this Policy should also be kept confidential by the Whistleblower.
- 7.3 Lenovo will not tolerate harassment, retaliation or any type of discrimination or adverse action against a Whistleblower or an employee, consultant, or contractor who in good faith (a) makes an internal report under this Policy; (b) provides information or assists in an investigation regarding such a report; or (c) files, testifies, or participates in a legal or administrative proceeding related to such matters. The Company will make every reasonable effort to ensure fair treatment of the Whistleblower and protect the Whistleblower from dismissal, demotion and other forms of retaliation. Anyone who victimizes or retaliates against a Whistleblower who has genuinely raised concerns in accordance with this Policy will be subject to disciplinary actions (including the possibility of dismissal).

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## 8. Data Protection

- 8.1 Depending on the location of the Whistleblower or the legal entity to which the report relates, the personal data associated with the report will be likely governed under one or many overarching data protection regulations. The Company will make sure that, in each case, handling of personal data in the context of the report investigation will satisfy all applicable data protection laws.
- 8.2 The Company should, in each case, only be collecting relevant and proportionate information, i.e., not more information than necessary. The Company also encourages the Whistleblowers to provide only relevant information in the context of the reported behavior, rather than non-related and excessive information. In any case, the Company will implement relevant quality check mechanisms, involving an initial check of the information reported and keeping only the information that is relevant to the case.
- 8.3 The Company will also provide to applicable individuals relevant information about how it processes their personal data, as required by applicable data protection regulations or other laws, as soon as practically possible. However, it is possible that informing the accused person at an early stage might under certain circumstances jeopardize the investigation. In these cases, the deferral of information should be decided on a case-by-case basis and the reasons for any restriction should be documented.
- 8.4 The Company will apply appropriate technical and organizational security measures in order to

protect information contained in the report. Mainly, it will ensure that only authorized personnel have access to the information (need-to-know basis), will use reliable technology and vendors providing sufficient safeguards, and ensure that the involved personnel are properly trained and bound by the confidentiality obligations.

- 8.5 The records containing personal data will be kept as described in paragraph 5.7 above, however for no longer than required by applicable local laws and regulations and respective Lenovo standards and policies.
- 8.6 For more information about processing of personal data in the context of handling the reports, please, read the Lenovo Data Privacy Policy available [here](#).

## 9. Untrue Allegations

- 9.1 In raising a concern or report pursuant to this Policy, the Whistleblower should exercise due care to ensure the accuracy of any information provided.
- 9.2 If the Whistleblower is mistaken about the concern raised, they will not be at risk of losing their job or suffering any form of retaliation as a result, provided that they are acting in good faith.
- 9.3 If the Whistleblower deliberately raises false or malicious allegations, disciplinary actions (including the possibility of dismissal) will be taken against them.

## 10. Disclosure of this Policy

- 10.1 The Policy will be published on the Company’s intranet site for employees and publicly on the Company’s website ([www.lenovo.com](http://www.lenovo.com)).

## 11. Implementation and Review of this Policy

- 11.1 The IOC shall have overall responsibility for the implementation, monitoring and periodic review and update of this Policy and to ensure that effective arrangements are in place for fair and independent investigations of relevant matters and appropriate follow-up actions.

## 12. Approval History

Version Number	Effective Date	Approved by
1.0	February 14, 2023	Lenovo Executive Committee