



Corporate Social Responsibility Policy

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For Lenovo Global Technology (India) Private Limited

Amit Luthra

Managing Director and member of CSR Committee

DIN: 09622522

Date: 29.01.2024

1. Context

Lenovo is committed to ethical corporate citizenship and to promoting sustainability in all its activities. We demonstrate these commitments through transparent and responsible management of our social, environmental, and economic values. These values respect and are informed by those of all our stakeholders, including the communities with which we interact.

Lenovo enables social investment programs that support education, research, entrepreneurship, and disaster relief.

Lenovo invests in advancing **Science, Technology, Engineering/ English, Math's Education** programs, **increasing access to technology and opportunity** for diverse underserved populations and empowering communities we work and interact with to improve their lives.

Lenovo and our employees support the needs of the communities where we live and do business through select social investment opportunities that leverage our innovation leadership and global culture. Lenovo is committed to enhancing employee awareness on all aspects of responsibility to encourage values that persuade our staff to devote their time to services involving volunteering. Our employees engage in various outreach social, environmental, and educational programs including disaster relief in the local communities. We define our Corporate Social Responsibility (CSR) by following the "making the world better because of Lenovo" principle.

1.1 Vision:

Building a responsible future with Lenovo and Motorola

1.2 Mission:

Lenovo's Corporate Social Responsibility (CSR) mission is to empower diverse, underserved, and underprivileged population by increasing access to Science, Technology, Engineering/English and Mathematics education to empower underserved and underprivileged communities with technology & opportunity in which we operate to improve their way of living. Lenovo and its employees are committed to helping those less fortunate and when disaster strikes to lending a hand to those who are in difficult circumstances.

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2. Objective of the Policy

In alignment with the vision of the company, Lenovo, through its CSR initiatives will strive to support the long-term economic, social and environmental health of our company and the communities in which we operate.

This CSR policy will help establish a consistent Corporate Social Responsibility (CSR) framework in alignment with Section 135 of the Companies Act 2013 by articulating the key focus areas for Lenovo CSR in alignment to Schedule VII of Companies Act, 2013 and serve as a guidance to help define, implement, monitor and report all CSR projects undertaken under this policy.

This policy will be applicable to all CSR programs and initiatives undertaken by Lenovo and entities in India at various locations where Lenovo and its group offices are located for the benefit of diverse communities in India. The framework will enable implementation of the CSR projects either directly or through capability assessed implementation agencies or chosen not for profit as implementation partners who are either a registered trust, or a registered society, or a section 8 company with an established track record of at least 3 years in similar programs or projects.

The policy will clarify the scope and applicability of the policy, CSR governance structure, define the manner in which the CSR funds will be budgeted & allocated, scope of implementing partners & CSR projects, implementation & monitoring of the projects, treatment of unspent funds & surplus if any from the total allocated amount for CSR projects and review & amendment of the policy.

3. Scope of the Policy

This CSR policy document is applicable to the following entities currently in place and any other entities that maybe set up.

- Lenovo (India) Private Limited
- Motorola Mobility India Private Limited
- Lenovo Global Technology (India) Private Limited

The core areas for Lenovo's CSR Policy are in alignment to the Schedule VII of the Companies Act 2013, including those in **Annexure A** of this policy:

For Lenovo Global Technology (India) Private Limited

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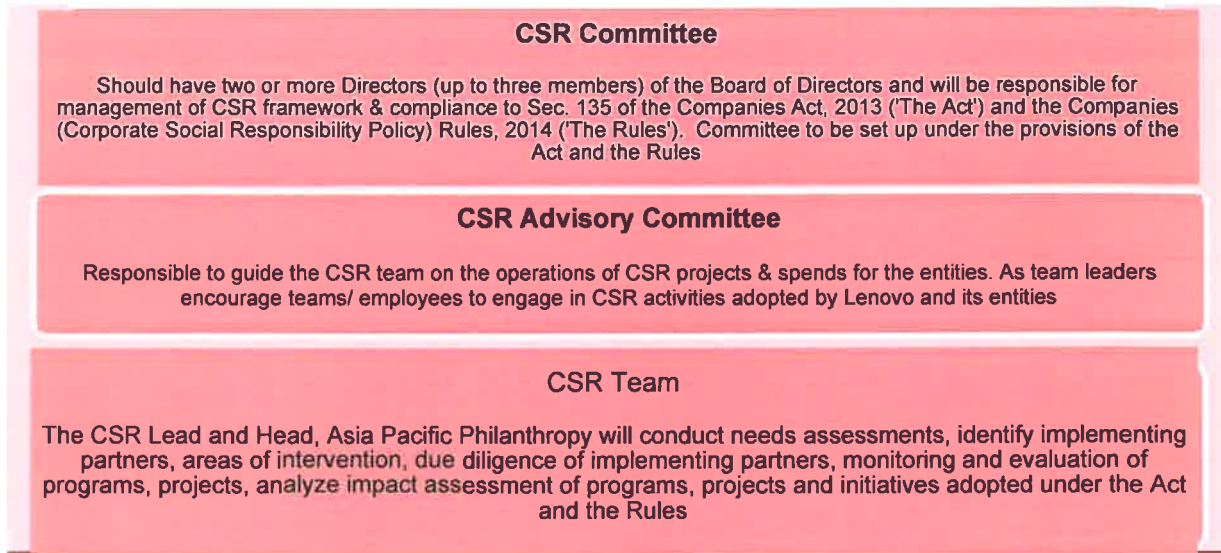
Managing Director and member of CSR Committee

DIN: 09622522

Date: 29.01.2024

4. Governance Structure

Accordingly, Lenovo and all entities will work closely with the CSR committee of the Board to implement the CSR activities that are approved by the Board of Lenovo.



4.1 Board of Directors of Lenovo

Members with Lenovo and other India entity Boards' known as the CSR Committee will be responsible for management of CSR framework and compliance to Section 135 of the Companies Act, 2013 ('The Act') and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (The Rules), which will follow:

The Responsibilities of Board of a CSR-eligible company include the following:

- approve the CSR policy;
- disclose contents of such policy in its report and also place it on the company's website, if any;
- ensure that the activities included in the CSR policy are undertaken by the company;
- ensure that the company spends, in every financial year, at least two per cent of the average net profits of the company made during the three immediately preceding financial years;
- satisfy itself regarding the utilization of the disbursed CSR funds; and

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Amit Luthra
 Managing Director and member of CSR Committee

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- if the company fails to spend at least two per cent of the average net profits of the company, the Board shall, in its report made under clause (o) of sub-section (3) of Section 134, specify the reasons for not spending the amount and transfer the unspent CSR amount as per provisions of sections 135(5) and 135(6) of the Act.

Additionally, in case of ongoing projects, the responsibilities of the Board include:

- Identification of ongoing projects;
- Year-wise allocations of funds;
- Transferring the unspent money to a separate bank account as prescribed under sub-section (6) of section 135;
 - monitoring the implementation of the projects with reference to the approved timelines and year-wise allocation; and
 - making modifications, if any, for smooth implementation of the projects within the overall permissible time-period.

Refer to Annexure B for the current Board of Directors of the entities.

4.2 CSR Advisory Committee

The CSR Committee at the Board level will be supported by the CSR Advisory Committee who will guide the CSR Team. The functions of the CSR Advisory Committee will be as follows:


- Provide appropriate feedback to projects identified by the CSR Team.
- Advise where relevant on the CSR policy of the company from time to time and
- Provide appropriate feedback to the Board on the annual action plan in pursuance of its CSR policy which shall include items as mentioned in rule 5(2) of the Companies (CSR Policy) Rules, 2014.

4.3 CSR Team

Responsibilities of the CSR Team will include:

- Formulating the CSR Policy document and making amendments as required
- Work across cross-functional teams (Legal, HR, Finance, Vendor Management, Procurement, etc.) in the organization and external stakeholders to co-ordinate, implement and manage CSR projects.

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- Build strategy and strong partnerships to ensure and increase the impact of the company's CSR activities.
- Identifying organizations, due diligence of the implementing partners and conducting needs assessments for programs, projects and initiatives being selected
- Periodically review project progress and report to the CSR Committee
- Recommend the amount of expenditure to be incurred on CSR activities.

4.4 Frequency of meetings:

The CSR Advisory Committee will meet at least four times a year to evaluate the projects presented by the CSR Team, including present plan for Board approval and share update on the progress of the projects. approval.

The CSR Committee shall meet at least once every financial year and with atleast two members which include the CEOs and / or directors of each CSR-eligible corporate entity.

5. CSR Budget and Funding:

The CSR Committees & the Board of Directors for the above listed entities have agreed to spend, in every financial year, at least 2% of the average net profits made during the three immediately preceding financial years. For new entities where the period of three financial years since its incorporation has not been completed, during such immediately preceding financial years, in pursuance of its Corporate Social Responsibility Policy.

5.1 Treatment of unspent CSR amount: Any unspent CSR amount pertaining to any financial year, the Board will specify the reasons for not spending in the annual report and shall deal with the unspent amount in the following manner as specified in the FAQ section 7.1.

| Nature of unspent amount | Action required | Timelines |
|---|---|--|
| Unspent amount pertaining to 'ongoing projects. | Transfer such unspent amount to a separate bank account of the company to be called as 'Unspent CSR Account'. | Within 30 days from the end of the financial year. |

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| | | |
|--|--|---|
| Unspent amount pertains to 'other than ongoing projects. | Transfer unspent amount to any fund included in the Schedule VII of the Act. | With 6 months from the end of the financial year. |
|--|--|---|

A. Funds under Schedule VII includes

1. Swachh Bharat Kosh
2. Clean Ganga Fund
3. Prime Minister's National Relief Fund (PMNRF)
4. Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund)
5. Any other fund set up by the Central Government and notified by the Ministry of Corporate Affairs, for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities, and women.

The proposed spend at an entity level will be aggregated for each company. Any surplus arising from the CSR Activities will not be treated as business profits and guidance as per clause 5.1 will be followed.

The Committee is entitled to recommend a higher amount than that specified in the Companies Act 2013 based on financial and other considerations.

5.2 Treatment of Surpluses

Any surplus generated from CSR projects undertaken shall be channelized into the CSR corpus. These funds shall further only be used in development of the CSR projects and shall not be added to the profits of the Company.

This sum shall be spent by Lenovo and its entities in pursuance of its obligation towards the Corporate Social Responsibility Policy within a period of three (3) financial years from the date of such transfer, failing which Lenovo and its entities shall transfer the same to a Fund specified in Schedule VII, within a period of 30 days from the date of the completion of the third financial year.

The above stated clause 5 is subject to any amendments as notified from time to time under the Indian Companies Act, 2013.

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6. CSR Implementing & Monitoring:

The CSR Advisory Committee will advise the CSR team on CSR mandates, will short list the organizations evaluated as potential partners and will manage the operations of the CSR spends for the entities with implementing plans drawn up by the CSR team.

The CSR Committees for respective entity will review the annual project list and provide its approval for execution. The CSR Team will provide quarterly report on the progress & project implementation.

The modalities of execution for all projects will be defined in partnership with the executing agency. The preferred option for Lenovo and its entities is to allow the Charity Partner (implementing partner) to lead the on-field execution while the Lenovo CSR team will perform monitoring & evaluation, project management and impact assessment internally and or through a third-party vendor providing such services.

Each project will be formally evaluated based on impact, timely completion & quality of work as per the project proposal. The implementation schedule for such projects will be individually defined & measured. All Charities under the program will be obligated to send monthly/ quarterly reports on the fund spend, impact, project status and upcoming challenges. The Lenovo CSR Team will monitor independently the utilization & spends by providing Quarterly Updates to the CSR Committees.

An annual exercise will be conducted to review the roadmap for the current year based on the previous year's performance and impact which will cover:

- Creation of a summary report for previous year's performance
- Selection of focus areas for the year with well-defined approach for the year that provides a roadmap to achieve the stated objectives;
- Selection of implementing partners with an annual budget;
- Tracking of expenses and regular periodic review of expenses against the annual budget;
- Monitoring progress of initiatives with strong processes for funds transfer to beneficiaries and implementation partners;
- Measuring end-beneficiary impact and auditing effectiveness of implementing partners;
- Updating Lenovo's website with updated CSR policy and Annual CSR Plan;

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- Ensuring compliance with regulatory requirements and publishing of the Annual Report on CSR as per Annexure II (updated in September 2022 amendment to the rules). And Form CSR-2 to be filed with MCA as a separate e-Form till the time it is not made an addendum to Form AOC-4.

6.1 Impact Assessment:

As per Rule 8(3) of the Companies (CSR Policy) Rules, 2014, the Board will follow the below definitions to conduct impact assessment, which will be conducted by an independent agency. The Impact Assessment shall be carried out project-wise only in cases fulfilling the definitions. In other cases, the Board will choose to undertake impact assessment on a voluntary basis.

- if the company minimum average CSR obligation is of Rs. 10 Crores or more in the immediately preceding 3 financial years; and
- Companies having CSR project outlays of minimum Rs. 1 crore and which have been completed not less than 1 year before undertaking impact assessment.

7. Implementing Partners

Partnering with registered trust or registered society or Section 8 Company that operates in Lenovo's core CSR areas of interest and or under Schedule VII of the CSR Act, 2013 with at least three (3) years track record and having CSR-1 registration with MCA. These partners will provide support for project identification, execution, on-ground implementation, monitoring & evaluation as per indicators identified and measure impact on the basis of pre-defined metrics. Due diligence of these organizations will be conducted either internally or through a third-party organization that provides such services. The implementing partners may have to provide regular data on pre-defined indicators to Lenovo and its entities or through a third-party organization that provides such services. All programs and projects being initiated through implementing partners will be undertaken through contracts and Memorandum of Understanding for the project period timelines.

8. CSR Projects:

CSR programs and projects will be designed for a minimum of two to three years to gauge and deliver measurable impact on the communities in which the interventions

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are being adopted and to build impactful partnerships. In exceptional cases, where the need is high, projects with a 12-month span could be considered.

9. Review and Amendment in the Corporate Social Responsibility Policy:

The CSR Boards of Lenovo and its entities shall review the CSR policy annually and may amend or modify this policy in whole or in part so long as it is not inconsistent with the provisions of the Act and Rules as and when notified by the Ministry of Corporate Affairs. The amendments as per CSR rules 2021 and 22 have been incorporated in this policy version.

10. Local CSR Policy & Procedures:

Lenovo and its entities operate in many markets and geographies and there is an overall intention to comply with applicable requirements. Accordingly, if a provision of this policy conflicts with the applicable local legal requirements, Lenovo and its entities will adopt country specific policies on this subject to accommodate local regulations / legal requirements.

For any queries and clarifications, please contact: csrindia@lenovo.com

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Annexure A: Companies Act – Schedule VII (Section 135)

Activities which may be included by companies in their Corporate Social Responsibility Policies Activities relating to: —

- (i) eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water;
- (ii) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- (iii) promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- (iv) ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water 48[including contribution to the Clean Ganga Fund setup by the Central Government for rejuvenation of river Ganga;
- (v) protection of National Heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional arts and handicrafts;
- (vi) measure for the benefit of armed force veterans, war widows and their dependents. (Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows];
- (vii) training to promote rural sports, nationally recognized sports, Paralympic sports and Olympics sports;
- (viii) contribution to the Prime Minister's National Relief Fund (or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund)

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or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Schedule Tribes, other backward classes, minorities and women;

- (ix) Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and contributions to public funded Universities, Indian Institute of Technology (IITs), National Laboratories and Autonomous Bodies (established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of Scientific and Industrial Research (CSIR), Department of Atomic Energy (DAE), Defence Research and Development Organisation (DRDO), Department of Science and Technology (DST), Ministry of Electronics and Information Technology) engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs);
- (x) rural development projects.
- (xi) slum area development.
- Explanation:- For the purposes of this item, the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.*
- (xii) disaster management, including relief, rehabilitation, and reconstruction activities.

References: (is only for reference)

- Companies Act 2013
- Companies (Amendment) Act, 2019 dated 31.07.2019 (Not yet Notified).
- Section 135 of Companies Act 2013
- Schedule VII of Companies Act 2013
- Leading Practice
- Companies (Corporate Social Responsibility Policy) Rules 2014
- Corrigenda MCA, 31 March 2014
- Notification MCA, 27 Feb 2014
- Notification MCA, 6 Aug 2014
- General Circular No. 21/2014 MCA
- Corrigenda MCA, 31 March 2014

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- *Notification MCA, 27 Feb 2014*
- *Notification MCA, 6 Aug 2014*
 - *Notified vide Gazette notification dated 02 April 2014 vide circular of Ministry of Corporate Affairs dated 31 March 2014.*
- *Notified vide notification by Ministry of Corporate Affairs dated 24 October 2014*
- *Notified vide notification by Ministry of Corporate Affairs dated 24 October 2014*
- *Notified vide The Gazette of India circular by Ministry of Corporate Affairs dated 6 August 2014*

For Lenovo Global Technology (India) Private Limited

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DIN: 09622522

Date: 29.01.2024

Annexure B – List of focus areas and members of CSR Board and Committee

| Lenovo (India) Private Limited | | |
|--|--|---|
| Focus Areas | CSR Advisory | CSR Committee |
| Technology in Quality Education | Subhankar Roy Chowdhury Executive Director, AP Geo HR | Shailendra Katyal, Vice President and Managing Director, India Region |
| Youth mobilization through skill development | Shrikanth Dhanakshirur Director India Manufacturing | |
| Skilling/ upskilling and reskilling | Bhavya Misra, Head, Human Resources - India | Ajay Sehgal, Executive Director - ISO Commercial Business India Meenakshi Dagar, Chief Financial Officer, India |

| Motorola Mobility India Private Limited | | |
|---|---|--|
| Focus Areas | CSR Advisory | CSR Committee |
| Education & Skill Development | Subhankar Roy Chowdhury Executive Director, AP Geo HR | Prashanth Mani Executive Director Asia Pacific Geo Lead, MBG |
| Healthcare & related programs requiring mobility technology | Harsh Bansal MBG CFO - Asia Pacific Bhavya Misra HR Head - India | Dinesh Kumar Bansal Chief Financial Officer, MBG |

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| Lenovo Global Technology (India) Private Limited | | |
|---|---|---|
| Focus Areas | CSR Advisory | CSR Committee |
| Technology in Quality Education Youth mobilization through skill development Female Skilling / Female Entrepreneuers | Bhavya Misra Head, Human Resources - India Meenakshi Dagar Chief Financial Officer, India PCSD | Amit Luthra Managing Director, ISG India Jayesh Prakash Khatri Chief Financial Officer, ISG Lingamneni Srinivas Rao Director, Presales and Solutions |

ANNEXURE C

ANNEXURE – II

FORMAT FOR THE ANNUAL REPORT ON CSR ACTIVITIES TO BE INCLUDED IN THE
BOARD'S REPORT

FOR FINANCIAL YEAR COMMENCING ON OR AFTER THE 1ST DAY OF APRIL, 2020

1. A brief outline of the Company's CSR
Policy of the Company

2. The composition of the CSR Committee:

| SL no | Name of Director | Designation/Nature of Directorship | Number of CSR meetings held during the year | Number of CSR meetings attended during the year |
|----------|------------------|---------------------------------------|---|---|
| | | | | |
| | | | | |

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Date: 29.01.2024

| | | | | |
|--|--|--|--|--|
| | | | | |
| | | | | |

3. Provide the web-link where Composition of CSR committee, CSR Policy and CSR projects approved by the board are disclosed on the website of the company:

4. Provide the executive summary along with web link of Impact assessment of CSR projects carried out in pursuance of sub-rule (3) of rule 8 of the Companies (Corporate Social Responsibility Policy) Rules, 2014, if applicable: _____

5.

- Average net profit of the Company as per Section 135(5) – INR
- Two percent of average net profit of the company as per section 135(5) – INR
- Surplus arising out of the CSR projects or programmes or activities of the previous financial year – Nil
- Amount required to be set off for the financial year –
- Total CSR obligation for the financial year [(b)+(c)-(d)] – INR

6.

- Amount spent on CSR Projects (Both Ongoing Project and other than Ongoing Project)- INR _____ (On-going INR _____ + other than on-going INR _____)
- Amount spent on Administrative Overheads – INR
- Amount spent on Impact Assessment, if applicable – INR
- Total amount spent for the Financial Year [(a)+(b)+(c)] – INR

e. CSR amount spent or unspent for the financial year.

| Total Amount Spent for the Financial Year. (In Rs.) | Amount Unspent (in Rs.) | | | | |
|---|---|------------------|--|--------|------------------|
| | Total Amount transferred to Unspent CSR Account as per sub section (6) of section 135 | | Amount transferred to any fund specified under Schedule VII as per second proviso to sub-section (5) of section 135. | | |
| | Amount | Date of Transfer | Name of the fund | Amount | Date of Transfer |
| | | | | | |

f. Excess amount for set off, if any –

| SL No | Particulars | Amounts (In Rs) |
|-------|-------------|-----------------|
| | | |

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| | | |
|-----|---|--|
| i | Two percent of average net profit of the company as per section 135(5) | |
| ii | Total amount spent for the Financial Year | |
| iii | Excess amount spent for the financial year [(ii)-(i)] | |
| iv | Surplus arising out of the CSR projects or programmes or activities of the previous financial years, if any Excess Spent during the FY carried | |
| v | Amount available for set off in succeeding financial years [(iii)-(iv)] | |

7. Details of Unspent CSR amount for the preceding three financial years:

| Sl. No. | Preceding Financial Year. | Amount transferred to Unspent CSR Account under section 135 (6) (in Rs.) | Amount spent in the reporting Financial Year (in Rs.). | Amount transferred to any fund specified under Schedule VII as per section 135(6), if any | Amount remaining to be spent in succeeding financial years. (in Rs.) |
|---------|---------------------------|--|--|---|--|
| | | | | | |

8. Whether any capital assets have been created or acquired through Corporate Social Responsibility amount spent in the Financial Year:

Yes No

If yes, enter the number of Capital assets created/ acquired.

Furnish the details relating to such asset(s) so created or acquired through Corporate Social Responsibility amount spent in the Financial Year:

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| Sl No | Short particulars of the property or asset (s) [including complete address and location of the property] | Pin code of the property or asset(s) | Date of Creation | Amount of CSR amount spent | Details of entity/Authority/beneficiary of the registered owner | | |
|-------|--|--------------------------------------|------------------|----------------------------|---|------|--------------------|
| (1) | (2) | (3) | (4) | (5) | (6) | | |
| | | | | | CSR Registration Number, if applicable | Name | Registered address |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |

(All the fields should be captured as appearing in the revenue record, Flat No. House No, Municipal office/Municipal Corporation/Gram Panchayat are to be specified and also the area of the immovable property as well as boundaries)

9. Specify the reason(s), if the company has failed to spend two per cent of the average net profit as per section 135(5)–

| | | |
|---|-----------------------------------|---|
| Sd/- (Chief Executive Officer or Managing Director or Director). | Sd/- (Chairman CSR Committee). | Sd/- [Person specified under clause (d) of sub-section (1) of section 380 of the Act] (Wherever applicable). |
|---|-----------------------------------|---|

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Approved list of CSR Projects
Lenovo Global Technology India Private Limited – FY 22-23

| Sr. No. | Sync with Schedule VII Activities | Brief details of project | | | |
|---------|-----------------------------------|--------------------------------|----------------------|----------------------------------|--|
| SL No. | | Name of Project | Thematic Area | Execution Modalities | Description of Program |
| 1 | Promoting Education | Hands On STEM Learning Program | Quality of Education | Agastya International Foundation | Using iMobile vans, engaging under privileged students in Bangalore, Gurgaon, and Mumbai cities with STEM curriculum, supporting Science Centre in Bangalore and engaging students in peri-urban and rural areas with Lab-on-a-Tab |

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| | |
|-----------------|---------------------------|
| Version No.: | 1.0 |
| Updated as of: | November 2019 |
| Created by: | CSR Team – Pratima Harite |
| Approved by: | CSR Committee |
| Approved as of: | May 2020 |
| Last updated: | October 2020 |

| | |
|-----------------|---------------------------|
| Version No: | 2.0 |
| Updated as of: | November 2022 |
| Created by: | CSR Team – Pratima Harite |
| Approved by: | CSR Committee |
| Approved as of: | 17 th Aug 2022 |
| Last updated: | October 2020 |

| | |
|-----------------|---------------------------------|
| Version No: | 2.1 |
| Updated as of: | August 2023 |
| Created by: | CSR Team – Pratima Harite |
| Approved by: | CSR Committee |
| Approved as of: | 11 th September 2023 |
| Last updated: | 17 th Aug 2022 |

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Lenovo

| | |
|-----------------|---------------------------------|
| Version No: | 2.2 |
| Updated as of: | January 2024 |
| Created by: | CSR Team – Pratima Harite |
| Approved by: | CSR Committee |
| Approved as of: | 17 th January 2024 |
| Last updated: | 11 th September 2023 |


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