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# Lenovo Anti-Bribery and Corruption (“ABAC”) Policy

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## 1. Purpose

Lenovo has zero tolerance for bribery and corruption. We may not solicit, offer, promise, authorize, provide or accept bribes, improper gifts or an undue advantage in any form (either directly or indirectly) in our work for Lenovo. We also may not ask or allow anyone including our business partners (such as suppliers, agents, consultants, channel partners, vendors, or service providers) to solicit, offer, promise, authorize, provide or accept bribes, improper gifts or an undue advantage in any form (either directly or indirectly) on our behalf. This policy applies to any interactions we have on behalf of Lenovo, including interactions with Government Officials and with individuals in the private or commercial sector.

Failure to comply with this policy may result in civil and criminal penalties and reputational damage for Lenovo and the individuals involved, and is grounds for disciplinary action, including termination, or referral to law enforcement agencies for serious breaches.

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## 2. Scope

This policy applies to all Lenovo employees (including full-time, part-time, temporary, and supplemental), consultants, and contractors. “Lenovo” includes the Lenovo Group Limited and its subsidiaries. Throughout this policy, the term “Lenovo representative” means anyone who must follow this policy.

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## 3. Policy

### 3.1 General Prohibition on Bribery

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

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

A bribe is anything of value offered or provided with a corrupt intent to influence an action or inaction or secure an improper business advantage. A bribe can be anything of tangible or intangible value. Anything of value could include cash or cash equivalents (for example gifts cards or redeemable vouchers), gifts, entertainment, travel (including travel overseas and to tourist destinations), accommodations, special discounts, loans, gold (or other precious metals) or jewelry, a donation to

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

The improper purpose for which a payment is made or accepted does not need to be achieved for there to be a crime, the mere offer or promise of anything of value may be illegal or violate other Lenovo policies (see, for example, Section H. Gifts, Entertainment, Corporate Hospitality, and Travel and other Business Expenditures). The use of personal funds or other resources in an attempt to circumvent any requirements under this Policy is strictly prohibited.

### **3.2 Comply with Laws, Regulations, and Treaties Wherever Lenovo Does Business**

The provisions of this policy apply everywhere Lenovo does business with no exceptions. In addition, we must follow all applicable laws, regulations, and international treaties that apply wherever Lenovo does business, including the Prevention of Bribery Ordinance (Cap 201 of the Laws of Hong Kong), amongst other relevant laws.

This policy does not address the specific provisions of all the laws, regulations, and treaties Lenovo must comply with every place we do business. Check Lenovo's Ethics and Compliance Office ("ECO") or your Geo Legal Department to make sure you know any additional rules that apply to your country or the country in which you are doing business.

### **3.3 Definition of Government Officials**

Lenovo representatives must take special care when dealing with Government Officials. Many countries where we do business have very strict anti-bribery laws that regulate how we interact with Government Officials. Business Courtesies can be an appropriate way to express respect for Third Parties with whom we do business, but they also have the potential to impair judgment and objectivity and, in some cases, can be considered bribes, especially in interactions with Government Officials. Therefore, even in countries where it may be customary to provide gifts and entertainment to Government Officials, due to the far-reaching antibribery laws, Lenovo policies must be strictly followed in all countries.

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

- Officers and employees of any local, provincial, or national government including police officers, municipal employees, members of the military, customs inspectors, tax auditors, employees of government consumer safety organizations, and appointees to government boards.
- Employees or representatives of government-owned or controlled businesses or institutions, including employees of government-owned telecom companies, government hospitals, media companies, and public schools and universities.
- Regulators or persons acting in an official capacity on behalf of regulators such as licensing, tax and customs agencies, commissions, or departments.
- Employees or representatives of public international organizations, including the United Nations, the International Olympic Committee, and the World Bank.
- People working on behalf of a government or public international organization such as an official advisor to a government.
- Employees or representatives of a political party.
- Candidates for political office.
- Members of royal families.

### **3.4 Accounting and Record-Keeping**

All Lenovo transactions must be accurately recorded in Lenovo's books and records, and must, in reasonable detail, accurately and fairly reflect company and financial transactions. We must follow all laws, regulations, standards, internal controls, and Lenovo accounting and financial reporting policies.

- No one at Lenovo may establish any undisclosed or unrecorded accounts (such as “off the books accounts”) on behalf of the company for any purpose.
- Do not conceal or hide an improper payment by intentionally omitting the payment or falsely describing it as a legitimate payment. False, misleading, or artificial entries may not be made in Lenovo’s books and records for any reason.
- You must accurately record the name, title, and organization of anyone receiving a gift or business courtesy and list the purpose of providing the courtesy.
- Ensure that any vendor, consultant, or other third party working for Lenovo submits accurate invoices and records documenting any goods or services provided on behalf of Lenovo with a reasonable level of specificity.

Follow all Lenovo policies when submitting financial transactions. Ensure that you provide sufficient evidence to show the business justification and details of each transaction including contracts, forms, and backup documentation. Any exceptions or possible violations in Lenovo’s accounting books and records must be reported immediately to the ECO, your local Legal Department, Lenovo Internal Audit, Lenovo’s Independent Commission Against Corruption (“ICAC”) in China or through the LenovoLine.

### **3.5 No Direct Payments of Any Size to Government Officials**

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

### **3.6 Use of Business Intermediaries**

Lenovo can be held criminally liable if a bribe or anything of value is solicited, offered, promised, authorized, provided or accepted through third parties acting on Lenovo’s behalf. All Lenovo business intermediaries including agents, representatives, channel partners, consultants, and service providers must comply with this policy. No business intermediary that Lenovo engages may solicit, offer, promise, authorize, provide or accept bribes, improper gifts or an undue advantage in any form (either directly or indirectly) on our behalf.

To mitigate this risk, Anti-Bribery and Corruption due diligence must be conducted on any business intermediary that Lenovo engages or seeks to engage that poses heightened bribery and corruption risk.

It is necessary for Lenovo to conduct Anti-Bribery and Corruption Due Diligence to better understand potential business intermediaries. Lenovo uses a risk-based approach to determine when Anti-Bribery and Corruption due diligence is required and the corresponding level of review. Due diligence is conducted to identify potential red flags that could signify financial, regulatory, or reputational risk to Lenovo. Third party participation is required dependent upon the level of due diligence review. Anti-Bribery and Corruption due diligence must be completed prior to contract signature with the business intermediary. Depending on the outcome of the due diligence review, additional risk mitigation measures may apply.

### **3.7 Offers of Employment or Work Experience**

Offers of employment or work experience (e.g., internships, shadow opportunities) may pose, in certain circumstances, bribery and corruption risk, particularly in connection with Government

Officials and those referred by Government Officials. Lenovo employees may not make offers of employment or work experience in order to obtain an improper business advantage or to influence any action or inaction. Employees must not accept anything of value for referring a candidate for any employment opportunity or work experience outside of established candidate referral programs administered by Human Resources. Candidates for employment or work experience that are referred by, or connected to, current or former Government Officials or other external parties cannot receive improper preferential treatment. All hiring practices must be carried out in accordance with Lenovo's established recruiting and hiring processes.

### **3.8 Gifts, Entertainment, Corporate Hospitality, and Travel and other Business Expenditures**

All gifts, entertainment, corporate hospitality and travel provided or accepted by anyone at Lenovo to or from any Third Party, and any business expenditure including payments or reimbursements to commercial third parties (non-government) and Government Officials must comply with Lenovo's Global Gift, Entertainment, Corporate Hospitality and Travel Policy ("Gifts Policy"). This includes Lenovo's sponsorship of education programs, conferences, or training where a third party or Government Official could receive something of value; any expenditures related to the execution or performance of a contract with a government entity; or any donations or gifts of products, services, money or any business courtesy of any value to any third party including a government agency or a public international organization.

### **3.9 Political Contributions**

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

### **3.10 Charitable Contributions**

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

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

- Proposals for charitable contributions must be submitted using the Lenovo Donation Compliance Form via Lenovo's Philanthropy team or the process as applicable in your respective Geo.
- Donations must never create the appearance of a bribe, kickback, or other corrupt practice.
- Donations must never be used to directly procure future Lenovo business or otherwise be made with the intent to obtain or retain business, secure an improper advantage, or induce anyone to act improperly.
- All charitable organizations receiving donations must be screened by the ECO to determine that (i) it is a legitimate charitable organization and (ii) it has no connection to a Government Official (or a close relative of an official) who is in a position to act or make a decision in favor of Lenovo.
- Charitable Contributions must also be accurately recorded in Lenovo's books and records.
- Donations must be consistent with Lenovo's [Conflict of Interest Policy](#).
- In case of any doubt, confirm in advance the donation is lawful under the written laws and regulations of the country/locality where the donation will be made with your local Legal Department.

### 3.11 Sponsorships

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

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

- Never offer or provide a sponsorship to improperly influence anyone or to obtain an improper advantage.
- Never provide a sponsorship that creates the appearance of a bribe, kickback or other corrupt practice.
- Ensure that any sponsorship is consistent with Lenovo's brand and core values.
- Ensure that all sponsorship agreements are documented in writing, and that payments are made to the entity receiving the sponsorship and not any individual.

Follow this policy and the Global Gift, Entertainment, Corporate Hospitality and Travel Policy when giving away anything Lenovo receives in exchange for the sponsorship such as products or tickets to the event that is being sponsored.

### 3.12 Mergers, Acquisitions, and Joint Ventures

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

### 3.13 Recognize Situations that Require Heightened Awareness

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

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

### 3.14 Training

Training is an integral component of any compliance program. Depending on the employee's role and responsibilities, tailored ABAC training may be provided

### 3.15 Report Any Concerns or Potential Violations

You have an obligation to report any concerns or violations of this policy. Lenovo strictly prohibits any form of retaliation for reports made in good faith.

You have several resources to make a confidential report including:

- Your manager (provided your manager is not involved in the violation) or another manager you trust
- Ethics and Compliance Office ("ECO") ([ethics@lenovo.com](mailto:ethics@lenovo.com))
- Human Resources
- LenovoLine (<https://www.integrity-helpline.com/lenovo.jsp>)
- The Legal Department
- The Lenovo Internal Audit Department
- In China, Lenovo's Independent Commission Against Corruption ("ICAC") ([ICAC@lenovo.com](mailto:ICAC@lenovo.com)).

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## 4. Questions

For further guidance, please visit the Ethics and Compliance page on Lenovo Central or contact Lenovo's Ethics and Compliance Office (ECO) at [ethics@lenovo.com](mailto:ethics@lenovo.com), if you have any questions or comments regarding this Policy.

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## 5. Related Policies and Procedures

- Ethics and Compliance Office Policy
- Conflicts of Interest Policy
- Global Gift, Entertainment, Corporate Hospitality, and Travel Policy
- Lenovo Code of Conduct
- Lenovo Charitable Giving Guidelines

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## 6. Approval History

Version Number	Effective Date	Approved by
1.0 <sup>1</sup>	February 14, 2023	Lenovo Executive Committee

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<sup>1</sup> This is the first version of the Policy since it was elevated to a Corporate Policy by the Lenovo Executive Committee. Previous versions of the Policy were governed by the Executive Ethics Committee.