

POL-00174 - Lenovo Statement Concerning Waste of Electrical and Electronic Equipment (WEEE)

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Lenovo's commitment to operating sustainably does not end at product purchase. We offer environmentally sound product take-back and recycling programs to business and consumer customers, respectively, in many countries around the world. These offerings are designed to satisfy specific customer and geographic needs while maximizing the reuse, recycling, and/or environmental disposal of replaced and end-of-life products, parts, and waste of electrical and electronic equipment (WEEE).

Lenovo's Commitment

Lenovo is committed to a safe and healthy environment and strives to ensure compliance with WEEE legislation across the world. Lenovo and all products sold by Lenovo will comply with WEEE legislation by:

- designing our equipment with consideration to future dismantling, recovery, reuse and recycling requirements;
- marking our products with the required symbols and informing users of their obligation to separate WEEE from general waste and dispose of it through provided recycling systems;
- reporting information as required by each legislation;
- facilitating the collection, recycling and disposal of WEEE from private households and other than private households (businesses) as defined by applicable regulations;
- providing information to treatment centers according to the requirements defined by local regulations.

Lenovo continues to work with WEEE consortia, recycling suppliers and our distributors / resellers to provide efficient processes for complying with WEEE obligations and we continue to refine those processes. Lenovo closely monitors developments regarding upcoming WEEE regulations and their transposition into national laws, as well as changes to existing WEEE and Ecodesign regulations, to ensure we continue meeting upcoming requirements by the date they become effective.

Global WEEE – Marking and Compliance

Lenovo complies with WEEE marking and other requirements in all geographies where we do business. The WEEE marking on Lenovo products applies to all countries with WEEE and e-waste regulations (e.g., European Directive 2012/19/EC, India E-Waste Management Rules, various US state and Canadian provincial regulations, etc.). Lenovo products are labeled in accordance with local regulations concerning WEEE, as applicable. These regulations determine the framework for the return and recycling of used products as applicable within each geography. Specifically required labels are applied to various products to indicate that the product is not to be thrown away as general waste, but rather put in the established collective systems for reclamation.

For more information on Lenovo's product recycling programs by country, please visit:

<http://www.lenovo.com/recycling>

The European Union's Directive on Waste Electrical and Electronic Equipment

(WEEE)

The EU Directive 2012/19/EC (also referred to as “WEEE recast” or WEEE 2”) of the European Parliament and of the Council of 4 July 2012 on waste electrical and electronic equipment (WEEE) came into force on August 13, 2012 and has been transposed into national law by EU member states. Directive 2012/19/EC replaced Directive 2002/96/EC, which had been in force since February 13, 2005 and was repealed with enforcement of WEEE2. The EU WEEE Directive was created to improve the collection, reuse and recycling of WEEE throughout the EU, and to reduce the level of non-recycled waste.

The directive gave some flexibility to EU member states in implementing their individual WEEE regulations, which lead to varying implementation requirements by country and may involve considerations beyond those reflected in this document. This statement is not intended and shall not be interpreted or construed to be legal advice or to be legally binding on Lenovo or any third party.

EU WEEE: Obligations for Buyers of Electrical and Electronic Equipment

As of 13 August 2005, in each EU member state where a WEEE scheme has been implemented, disposal of EEE waste other than in accordance with the scheme is prohibited. Generally, the schemes require collection and recycling of a broad range of EEE products, including personal computers. Lenovo PCs (desktops, notebooks, tablets, and similar products) fall within the scope of the directive and the implemented member state regulations. All such Lenovo products that have reached end-of-life must not be disposed as general waste, but instead put into the collection and recycling system provided in the relevant jurisdiction.

EU WEEE: Collection and Recycling of WEEE

Lenovo takes responsibility for the collection and recycling of WEEE where Lenovo is legally responsible for those obligations. In other countries, where the Business Partner is the legally responsible party, we expect the Lenovo Business Partner to take responsibility for all applicable obligations related to the importing and sale of Lenovo products including notification of authorities, reporting, showing registration numbers and/or visible fees on customer invoices, and collection and treatment of WEEE.

Where Lenovo is responsible for the collection and treatment of WEEE, Lenovo has established different processes depending upon whether the WEEE is from private households or other than private households (businesses).

EU WEEE: WEEE from Private Households

For WEEE from private households in EU countries where Lenovo imports products, Lenovo has met its obligations by joining national consortia in applicable countries and funding its share of their activity. Typically, these consortia collect waste from municipal collection points and arrange for its reuse, treatment or environmentally conscious disposal. WEEE may be brought by private households to municipality collection points and/or consortia collection points if they are offered in the local jurisdiction, or WEEE may also be returned to larger EEE retailers who accept WEEE when selling a new equivalent product or on a general basis (the customer should check with a retailer near them on actual take-back possibilities).

EU WEEE: WEEE from Other Than Private Households

For other than private household WEEE in the EU, Lenovo meets its obligations in those countries by joining consortia (where available for such purposes) or contracting with the European Advanced Recycling Network (EARN) to provide collection and treatment services for WEEE from eligible businesses.

In the EU, for electrical and electronic equipment (EEE) purchased before 13 August 2005, Lenovo will arrange for collection and treatment without charge to the customer (regardless of manufacturer) if part of a 1:1 replacement sale. For all Lenovo products put

on the market after 13 August 2005, Lenovo will arrange for the collection and treatment of the products regardless of whether a Lenovo replacement product is purchased. Other arrangements or agreements differing from the above may be agreed on contractual level if they are in scope of the directive or local jurisdiction. It is a requirement that the products to be collected are in a condition that will not endanger those collecting them.

WEEE Compliance in Other Geographies

China WEEE

The Regulations for the Administration of the Recovery and Disposal of Waste Electric and Electronic Products have been adopted at the Executive Meeting of the State on August 20, 2008. The Regulations are effective as of January 1, 2011.

The State implements a system of recovery by multiple channels and centralized disposal with respect to waste electric and electronic products. The recovery and disposal of, and any activities in relation to, the waste electric and electronic products listed in the Catalogue of Waste Electric and Electronic Products for Disposal 2014 shall be governed by these Regulations.

For more information on China WEEE, please visit:

<http://support.lenovo.com.cn/activity/551.htm>

Americas WEEE

In the Americas, WEEE regulations are managed at different levels based on jurisdiction, including country, state, provincial, territory, and city requirements. Lenovo is committed to meeting our recycling obligations in the Americas and has established a comprehensive network of programs to meet these requirements.

For full details on local recycling options in the Americas, please visit

www.lenovo.com/recycling and select your country.

India WEEE

India WEEE is enforced from 1st May 2012 as the first WEEE in the country through the India E-waste (Management & Handling) Rules, 2011. This law is amended and repealed by E-waste (Management) Rules, 2016. Lenovo ensures it will meet the requirements under this law. To meet its obligation, Lenovo offers free PC recycling thru its authorized recycling partner and promotes reuse and recycling of end-of-life products.

For full details on local recycling options, please visit www.lenovo.com/recycling and select India from the country dropdown menu.

Russia

Russia has a single recycling law that covers recycling and return of WEEE, batteries and packaging. Effective from January 2015, in Russia the Law on Waste Production and Consumption N 89-FZ1998, as amended by N 458-FZ, introduced the extended producer responsibility (EPR) principle. This places take-back and recycling obligations on producers/importers. Lenovo complies with the legal requirements directly or via Lenovo Business Partners in Russia.

For recycling possibilities in Russia, please contact your local municipality