

April 2023

Lenovo Cobalt Policy and Statement

Lenovo is committed to responsibly and ethically sourcing in our supply chain and to protecting human rights in everything we do. We expect our supply chain to procure minerals and raw materials responsibly and to avoid all forms of slavery and forced labor, including child labor.

In particular, we support efforts to prevent human rights abuses associated with Cobalt mining. We demonstrate this through our support of universal human rights principles, supplier contractual requirements, membership in key industry organizations, and implementation of policies, programs and tools that identify, prevent, mitigate and address risks. Our specific actions include:

Support of Human Rights Principles

Lenovo supports the following human rights principles:

- [United Nations Universal Declaration of Human Rights](#)
- [International Labor Organization \(ILO\) Declaration on Fundamental Principles and Rights at Work](#)
- [United States Federal Acquisition Requirements \(FAR\) on Combating Human Trafficking](#)
- [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)
- [Lenovo Human Rights Policy](#)

Responsible Business Alliance

Lenovo has been a supporting member of the Responsible Business Alliance (RBA) since 2006. The [RBA Code of Conduct](#) directly addresses all forms of forced labor, child labor, humane treatment and safety. We implement the Code within our supply chain internally and externally and formally use all RBA programs, tools and methodologies for assessments and audits. All Lenovo manufacturing locations are assessed and audited by independent 3rd party and RBA approved auditors. Externally we similarly validate compliance of approximately 95% by procurement spend including critical Tier 2 and 3 suppliers. Our supplier responsible sourcing requirements are contractually executed in our legal agreements, purchase orders and [Supplier Code of Conduct](#), which directly addresses Human Rights, Conflict Minerals, and Supply Chain Working Conditions.

Responsible Minerals Initiative and Cobalt

As a participating member of the Responsible Minerals Initiative (RMI), Lenovo has fully supported all industry and government efforts on Conflict Minerals of Tin, Tantalum, Tungsten and Gold (3TG) in the Democratic Republic of the Congo and the covered countries. We are also supporting and utilizing associated RMI programs and tools for cobalt. The RMI is currently working closely with multiple Cobalt stakeholders and is developing the same programs as for 3TG. Specifically, the RMI has:

- Formally defined “cobalt smelters or refiners”, identified over 100 entities.
- Established due diligence practices and provided a roadmap for us to manage cobalt risks. The OECD Guidance 5-step approach can equally be applied to cobalt.
- Developed initial tools to implement this due diligence including [Extended Minerals Reporting Template \(EMRT\)](#), [Cobalt Refiner List](#) and Risk Mitigation Protocol.

Lenovo has been taking the same steps to mitigate human rights risks in our cobalt supply chain as for 3TG, specifically we are:

- Implementing due diligence frameworks including OECD 5-step guidelines, and reporting on cobalt supply chain using EMRT (covering suppliers represent about 95% of our procurement spend)
- Participating in industry initiatives to develop standard due diligence tools and audit protocols
- Engaging with cobalt refiners, encouraging them to undergo the Responsible Minerals Assurance Process (RMAP) or equivalent audits that assure responsible sourcing of cobalt
- Providing training and education on cobalt due diligence to suppliers, helping them understand the potential risks and OECD Guidance.

Sincerely,



Lenovo Global Supply Chain Sustainability Director



联想钴业政策和声明

联想致力于在我们的供应链中以负责任和道德的方式进行采购，并在我们所做的每一件事中保护人权。我们期望我们的供应链负责地采购矿物和原材料，避免一切形式的奴役和强迫劳动，包括使用童工。

特别地，我们支持努力防止与钴矿开采有关的侵犯人权行为。我们通过支持普遍的人权原则、供应商合同要求、加入主要行业组织，以及实施识别、预防、减轻和解决风险的政策、项目和工具来证明这一点。我们的具体行动包括：

对人权原则的支持

联想支持以下人权原则：

- [联合国世界人权宣言](#)
- [国际劳工组织（ILO）关于工作中的基本原则和权利宣言](#)
- [美国联邦采购要求（FAR）关于打击人口贩运的规定](#)
- [经合组织对受冲突影响和高风险地区矿物负责任供应链的尽职调查指南](#)
- [联想人权政策](#)

负责任商业联盟

自 2006 年以来，联想一直是负责任商业联盟（RBA）的成员。[RBA 行为准则](#) 直接涉及所有形式的强迫劳动、童工、人道待遇和安全。我们在内部和外部的供应链都遵循该行为准则，并正式使用所有 RBA 项目、工具和方法进行评估和审计。所有联想制造基地都由独立的第三方和 RBA 批准的审核公司进行评估和审计。在外部，我们同样基于采购金额（范围包括关键的二级和三级供应商）验证大约占我们总采购额 95% 的供应商的合规性。我们的供应商负责的采购要求在我们的法律协议、采购订单和《[供应商行为准则](#)》中均依据合同执行，其中直接涉及人权、冲突矿物和供应链工作条件。

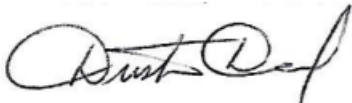
负责任矿物倡议和钴

作为负责任矿产倡议（RMI）的参与成员，联想充分支持所有行业和政府对于刚果民主共和国和相关国家在冲突矿物锡、钽、钨和金（3TG）方面的努力。我们也充分支持和利用 RMI 关于钴的项目和工具。RMI 目前正与多个钴矿项目的利益相关者密切合作，并持续开发与 3TG 相同的项目。具体而言，RMI 已经：

- 正式定义“钴矿冶炼厂或精炼厂”，确定了 100 多家实体；
- 建立了尽职调查实践，为我们管理钴矿风险提供了路线图。经合组织的五步指导法同样适用于钴矿；
- 开发了实施尽职调查的初始工具，包括[扩展矿物报告模板（EMRT）](#)、[钴精炼商名单](#)和[风险缓解协议](#)。

联想一直在采取与管理 3TG 相同的步骤来降低我们钴供应链中的人权风险，具体而言，我们正在：

- 实施包括经合组织五步指南在内的尽职调查框架，并使用 EMRT 报告钴供应链的情况（覆盖的供应商占我们采购支出的 95%）；
- 参与行业倡议，制定标准的尽职调查工具和审计协议；
- 与钴精炼商接触，鼓励他们接受负责任的矿物保证程序（RMAP）或同等计划。



联想全球供应链可持续发展总监