Global Gift, Entertainment, Corporate Hospitality and Travel Policy

Exchanging Business Courtesies with Third Parties

For guidance on internal exchanges and business travel, review Lenovo's Travel and Expense Policy.

1. SCOPE

This Global Gift, Entertainment, Corporate Hospitality and Travel Policy ("Policy") applies to Lenovo Group Limited and its subsidiaries, present and future ("Lenovo"), to all Lenovo employees (including full-time, part-time, supplemental and temporary), and to all Lenovo consultants and contractors in connection with their work for Lenovo ("Lenovo Representatives"). Lenovo employees who manage relationships with consultants or contractors are responsible for ensuring the compliance of the consultants or contractors with this Policy in connection with their work for Lenovo.

This Policy applies to all Gifts, Entertainment, Corporate Hospitality and Travel, (also referred to as "Business Courtesies"), solicited, offered, accepted or provided between Lenovo Representatives and Third Parties with whom Lenovo Representatives interact, such as distributors, agents, resellers, channel partners, suppliers, current or prospective customers, consultants, contractors and Government Officials.

This Policy does not apply to internal exchanges among Lenovo employees, such as holiday gifts between coworkers.

2. POLICY STATEMENT

Lenovo is committed to conducting business legally, ethically, and with integrity and to following the law wherever we do business. Lenovo's business relationships must be based on sound business factors and fair dealing. 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.

Lenovo Representatives may only solicit, offer, accept or provide Gifts, Entertainment, Corporate Hospitality or Travel for a Legitimate Business Purpose. Bribes or attempts to bribe are never allowed. Lenovo Representatives must be diligent to avoid situations where a Business Courtesy may be perceived as a bribe.

This Policy provides requirements to ensure Lenovo Representatives follow the Lenovo Code of Conduct ("Code") and all applicable laws. If a direct manager, business unit, region or country has implemented stricter rules, the more restrictive rules prevail. Rules or local policies that are less restrictive than this Policy are not allowed.

Lenovo is subject to anti-corruption laws that require Lenovo Representatives to follow special rules when providing a Business Courtesy to Government Officials. Always proceed with caution and obtain the approvals required by this Policy prior to providing anything of value to a Government Official.

For questions related to this Policy, contact Ethics and Compliance or the Legal Department for guidance before proceeding.

3. DEFINITION OF ADDITIONAL KEY TERMS

CORPORATE HOSPITALITY AND TRAVEL - all domestic or international travel and expenses solicited, offered, accepted or provided between a Lenovo Representative and a Third Party where the Corporate Hospitality or Travel serve a Legitimate Business Purpose, for example, to demonstrate a specific Lenovo product or service.

The value of Corporate Hospitality and Travel includes all related expenses, such as logistics support, airfare, ground transportation, accommodations or lodging, meals, per diems, entry fees, Gifts, Entertainment, and any incidental expenses such as tips.

Examples of Corporate Hospitality and Travel include:

- Airfare to attend a product training or product launch
- Train tickets to attend a service demonstration
- Travel costs or entry fees associated with attendance at industry events such as the Consumer Electronics Show or Mobile World Congress

ENTERTAINMENT - any recreational, social or sporting activity solicited, offered, accepted or provided between a Lenovo Representative and a Third Party with *participation by both parties*. If the activity includes only a Third Party or only a Lenovo Representative, it is a Gift, and the rules in this Policy relating to Gifts apply.

Examples of Entertainment include:

- Meals and drinks such as breakfasts, lunches, dinners, coffee, cocktail hours, and snacks
- Events and shows such as music concerts, cultural or holiday shows
- Recreational or sporting activities such as rounds of golf, fishing excursions, Entertainment at karaoke bars; motorsports events, and football games

GIFTS - anything of value solicited, offered, accepted or provided between a Lenovo Representative and a Third Party.

Gifts of cash or cash equivalents, such as gift cards, gas cards, gift vouchers and loans, are never allowed. No Lenovo Representative may solicit, offer, accept or provide cash or cash equivalents.

As an exception to the general prohibition against exchange of gifts of cash or cash equivalents, vouchers for mooncakes or food baskets may be exchanged with Third Parties in connection with the China Spring Festival or the Mid-Autumn Festival if: (i) the value of the voucher is less than RMB 300; and (ii) the voucher expressly reflects that it cannot be sold or redeemed for cash value.

Examples of Gifts include:

- Promotional items such as Lenovo-branded backpacks, golf balls, hats, shirts, pens
- Holiday gift baskets of snacks and other food items
- Mooncakes
- Tobacco or alcohol
- Lenovo products
- Tickets or access to sporting events, music concerts, cultural events or holiday shows for personal use where there will not be participation by both a Lenovo Representative and a Third Party

GOVERNMENT OFFICIALS - Government Officials are broadly defined, often not immediately recognizable, and are not just senior-level government employees or representatives. All employees of government-owned or government-controlled entities are considered Government Officials. Employees of entities that appear to be private entities but that are owned or controlled by the government are also Government Officials.

In certain countries (e.g., China and Brazil), Government Officials also include personnel engaged in public service at state-owned corporations, enterprises, institutions, and people's organizations, personnel from these entities assigned to engage in public service in non-state-owned corporations, enterprises, institutions, and social organizations, and other working personnel engaged in public service.

Examples of Government Officials include:

- Government employees; Representatives or advisors of a political party; Candidates for political office; Members of royal families
- Police officers; Members of the military; Customs inspectors; Tax auditors; Government consumer safety organization employees; Appointees to government boards
- Employees of government-owned or controlled businesses or institutions such as government-owned telecom companies (e.g., China Mobile); State-owned oil and gas companies (e.g., Petrobras); Government-controlled hospitals; Government-owned media companies, television stations or newspapers; Public schools, universities, or research institutions
- Representatives of public international organizations such as The United Nations; The International Olympic Committee; The World Bank
- Close relatives or significant others (parents, siblings, children, spouse, romantic partners, close personal friends) of any of the above.

LEGITIMATE BUSINESS PURPOSE - any lawful business goal, interest or objective of Lenovo that does not violate Lenovo's Code, policies, or applicable law.

THIRD PARTY - any individual who is not a Lenovo employee and who interacts with Lenovo or a Lenovo Representative, such as distributors, agents, resellers, channel partners, suppliers, current or prospective customers, consultants, contractors, and Government Officials.

4. STANDARDS FOR ALL GIFTS, ENTERTAINMENT, CORPORATE HOSPITALITY AND TRAVEL

Lenovo Representatives must comply with the following rules when interacting with Third Parties.

4.1 BUSINESS COURTESIES MUST MEET SPECIFIC CRITERIA

Any Business Courtesy solicited, offered, accepted or provided by Lenovo Representatives must be infrequent, customary and appropriate (including the value of the Business Courtesy), not offered in expectation of special or favored treatment, and serve a Legitimate Business Purpose.

Lenovo Representatives may not solicit, offer, accept or provide any Business Courtesy that is illegal, sexually oriented, a bribe or intended to be a bribe, or in any other way inconsistent with Lenovo's Code or company values. Business Courtesies must also be customary and appropriate for the particular business situation, the country where they are offered, and for the position of the representatives involved.

Always consider whether the value, frequency or timing creates even the appearance of impropriety and if the exchange would reflect poorly on Lenovo if the details were made public.

4.2 NO BRIBES

It is never acceptable to, directly or indirectly through any party (e.g., agent, distributor, advisor, consultant), solicit, offer, accept or provide a bribe, kickback or anything of value with the intent to improperly obtain or retain any business or other advantage (such as winning business, securing favorable tax treatment, or receiving a competitor's bid information), or to cause or intend to cause the recipient to act improperly or unlawfully. Personal services, promises of future employment, personal business opportunities, and charitable or political contributions may under certain circumstances be considered bribes. Lenovo Representatives must avoid even the appearance of corruption when soliciting, offering, accepting or providing any Business Courtesy.

4.3 NO BUSINESS COURTESIES TO FAMILY MEMBERS

No Business Courtesy may be knowingly solicited, offered, accepted or provided to the spouse, romantic partners, parents, siblings, children, close relatives or significant other ("Family Members") of any Third Party. Family Members of Lenovo Representatives may also not solicit, offer, accept or provide Business Courtesies to a Third Party.

4.4 OBTAIN PROPER APPROVALS

Always obtain proper approvals as established in this Policy. See Section 4.9 for details on required approval levels.

4.5 MAINTAIN ACCURATE BUSINESS RECORDS

All Business Courtesies provided by Lenovo must be properly recorded in Lenovo's books and records. Lenovo Representatives may not circumvent the approval, review and reimbursement process by providing Business Courtesies with their own funds or by utilizing any other party. All Business Courtesies must be supported by receipts and appropriate documentation. Business Courtesies must comply with this Policy and all applicable Travel and Expense Policies.

When Lenovo is providing the Entertainment the most senior Lenovo employee present is responsible for making the corresponding payment and submitting the expense report to her/his direct manager for approval.

4.6 COMPLY WITH POLICIES AND LAWS

All Business Courtesies must comply with Lenovo's Code, Lenovo's policies, all applicable laws, and applicable Third-Party policies. In certain countries, for example, it is unlawful to offer or provide anything of value to a Government Official. Lenovo Representatives are responsible for ensuring that all Business Courtesies do not, directly or indirectly, violate these standards. Direct questions to the Legal Department or Ethics and Compliance.

4.7 CORPORATE HOSPITALITY AND TRAVEL PROVIDED TO OR FROM THIRD PARTIES

Any Corporate Hospitality and Travel must serve a Legitimate Business Purpose and must be pre-approved, in writing, by your direct manager and the regional or country General Manager or Business Unit Vice President (or higher) in your reporting line. See the Approval Summary, below. In addition:

- The amount of time spent on non-business activities and events should be limited.
- Corporate Hospitality and Travel expenses for any Family Members, or personal guests to accompany the traveler for any portion of the travel, are not allowed.
- All payments for approved Corporate Hospitality and Travel related expenses (airfare, transportation, meals, accommodations, incidentals) must be made directly to the provider of services and not to the individual receiving the Corporate Hospitality and Travel.
- The class of travel and accommodations provided should comply with Lenovo's Travel and Expense Policy.

4.8 FREE OR HEAVILY DISCOUNTED LENOVO PRODUCT

Any free or heavily discounted Lenovo products provided to Third Parties must be provided for Legitimate Business Purposes such as demonstration and testing of a Lenovo product or service.

For Commercial (Non-Governmental) Third Parties

The pre-approval process established by the applicable business unit, region or country for providing free or heavily discounted Lenovo products to commercial (non-governmental) Third Parties must be followed. Lenovo departments are required to maintain appropriate business records of any free or heavily discounted Lenovo product provided to Third Parties.

For Government Officials

Lenovo products may be provided to Government Officials for the purpose of promoting, explaining or demonstrating the capability of the products. If the Lenovo product is not provided for this purpose, then it is a Gift. Lenovo products should be provided to the Government Entity, not to a particular Government Official, the recipient may be requested to provide a technical review or survey about the product, and the product will be returned to Lenovo if requested.

Ethics and Compliance approval, per the Government Approval Process, must be obtained prior to providing any free or heavily discounted Lenovo product (as a Gift or for demonstration purposes) to Government Officials.

4.9 APPROVAL SUMMARY: PROVIDING AND ACCEPTING BUSINESS COURTESIES TO OR FROM THIRD PARTIES

For information related to additional approvals needed prior to interactions with Government Officials, see Section 5. The exchange of any value during a pending competitive bid or tender raises additional concerns. Contact the Legal Department for guidance.

Gifts and Entertainment	Less than $100 USD	No pre-approval required.
Gifts and Entertainment	$100 USD - $250 USD	Providing - Written pre-approval by direct manager is required. In situations where written pre-approval by direct manager is not possible (e.g., an impromptu business dinner), written approval after the exchange is required. Accepting - Written pre-approval by direct manager is preferred. In situations where written pre-approval by direct manager is not possible (e.g., receipt of an unexpected gift), written notification to direct manager after the exchange is required.
Gifts and Entertainment	More than $250 USD but less than $500 USD	Providing - Written pre-approval by direct manager and regional or country General Manager or Business Unit Vice President (or higher) in reporting line is required. In situations where written pre-approval is not possible (e.g., an impromptu event), written approval after the exchange is required. Accepting - Written pre-approval by direct manager and regional or country General Manager or Business Unit Vice President (or higher) in reporting line is preferred. In situations where written pre-approval is not possible (e.g., receipt of an unexpected gift), written notification to direct manager after the exchange is required.

Gifts and Entertainment	$500 USD or more	Providing - Written pre-approval by direct manager, regional or country General Manager or Business Unit Vice President, and Senior Vice President (or higher) in reporting line is required. In situations where written pre-approval is not possible, (e.g., an unforeseen opportunity to entertain), written approval after the exchange is required. Accepting - Written pre-approval by direct manager, regional or country General Manager or Business Unit Vice President, and Senior Vice President (or higher) in reporting line is preferred. In situations where written pre-approval is not possible, (e.g., receipt of an unexpected invitation to sporting event), written notification to direct manager after the exchange is required.
Free or Discounted Lenovo Product	Any Value	Providing - Written pre-approval must be obtained prior to providing the product as required by the applicable business unit, region or country process.
Corporate Hospitality and Travel	Any Value	Providing or Accepting - Written pre-approval by direct manager and regional or country General Manager or Business Unit Vice President (or higher) in reporting line is required.
Government Officials	Any exchange of any value, including Lenovo Products	Management approvals as noted above, plus written pre-approval by Ethics and Compliance per the Government Approval Process.

Note: All amounts noted above are standards per person. Written management approval should contain the name of the third-party individual, company or organization, type of expense, business purpose, projected value and date (see training for examples).

Senior Executives (SVP and above) require pre-approval by their direct manager and Lenovo's Chief Ethics and Compliance Officer for any Business Courtesy solicited, offered, accepted or provided to or from Third Parties in excess of $1,000 USD per person. SVP and above must also obtain Ethics and Compliance approval as outlined in the Government Approval Process prior to exchange of any value with a Government Official.

5. ADDITIONAL STANDARDS FOR INTERACTIONS WITH GOVERNMENT OFFICIALS

BUSINESS COURTESIES FOR GOVERNMENT OFFICIALS

In order to assist in ensuring compliance with international anti-corruption laws and standards, Lenovo discourages offering or providing Business Courtesies to Government Officials. Offering or

providing Business Courtesies to a specific Government Official must be infrequent, typically not more than twice in the preceding 12-month period.

All Hospitality and Travel for Government Officials must be held in an appropriate venue. For example, extravagant or renowned venues, luxury hotels, and vacation destinations should be avoided.

Before offering or providing any Business Courtesy, free or discounted Lenovo product, or pre-paid hospitality or travel included in purchase contracts to any individual you believe to be a Government Official, in addition to the appropriate management approvals required by Section 4.9 above, you must receive approval from Ethics and Compliance. To request Ethics and Compliance approval, follow the steps to obtain approval as outlined in the Government Approval Process. In some jurisdictions, local laws may not permit certain types or amounts of Business Courtesies to Government Officials.

If a consultant or contractor does not have access to the Government Approval Process, the Lenovo employee who manages the relationship with the consultant or contractor will be responsible for requesting and obtaining Ethics and Compliance approval.

All approval requests must be submitted sufficiently in advance to allow time for review and approval. Generally, requests for approval should be submitted **at least ten business days in advance** of making the proposed offer.

If you incur an expense related to a Government Official prior to obtaining approval from Ethics and Compliance, you must still follow the Government Approval Process after incurring the expense.

6. LENOVO-SPONSORED RAFFLES OR LUCKY DRAW EVENTS FOR ALL THIRD PARTIES

Lenovo products or other Gifts may be provided in bona fide random drawings, raffles, or lucky draws if the drawing is not designed to reward any specific Third Party; the drawing is objectively managed; and the drawing receives written pre-approval by Ethics and Compliance and the Legal Department. This restriction does not apply to internal Lenovo random drawings.

In China, Lenovo may not provide products or other Gifts in any random drawings, raffles, or lucky draws that exceed 50,000 RMB in value.

Check with your corresponding Business Group and Legal Department for local rules on random drawings, raffles, and lucky draws before proceeding.

7. EXCEPTIONS TO THIS POLICY

All proposed exceptions to this Policy must be approved by Lenovo's Chief Ethics and Compliance Officer. Requests for an exception may be submitted to ethics@lenovo.com.

8. CONSEQUENCES FOR NONCOMPLIANCE

Failure to comply with this Policy may result in civil and criminal penalties for Lenovo, Lenovo Representatives, and all individuals involved and provides grounds for disciplinary action, including termination of employment, or termination of contractual relationship.

9. ADDITIONAL RESOURCES

Additional resources are available to support compliance with this policy:

- Training Program for Employees (English, Simplified Chinese)
- Training Program for Managers (English, Simplified Chinese)
- Government Approval Process (English, Simplified Chinese)
- Quick Guide (English, Simplified Chinese)

10. REPORTING VIOLATIONS OF THIS POLICY & COMMITMENT TO NON-RETALIATION

All suspected and known violations of this Policy must be reported using any of the methods described in the Code. Lenovo Representatives can raise concerns at any time by contacting:

- Your manager (if your manager is not involved) or another manager you trust
- Ethics and Compliance (ethics@lenovo.com)
- Human Resources
- The LenovoLine
- The Legal Department
- In China, Lenovo's Independent Commission Against Corruption (ICAC@lenovo.com)

Lenovo does not tolerate retaliation against any employee, consultant or contractor for reporting an issue or raising a concern he or she believes to be true, cooperating with an investigation or audit, or refusing to participate in activities that violate the Code, laws or company policies.

VERSION/RELEASE HISTORY

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