

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549
FORM SD
SPECIALIZED DISCLOSURE REPORT

Lenovo Group Limited



Non-Applicable: Lenovo is not subject to the SEC Disclosure Requirement

State or other jurisdiction of
incorporation or organization

Commission File Number
File Number

IRS Employer
US TIN 52-2449153

23rd Floor, Lincoln House, Taikoo Place, 979 King's Road, Quarry Bay, Hong Kong

Address of principal executive offices

Dustin Deal

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Name and telephone number, including area code, of the person to contact in connection with this report.

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2022.

Introduction

Lenovo (HKSE: 992) (ADR: LNVGY) is a US\$70 billion revenue global technology powerhouse, ranked #171 in the Fortune Global 500, employing 75,000 people around the world, and serving millions of customers every day in 180 markets. Focused on a bold vision to deliver smarter technology for all, Lenovo has built on its success as the world's leading PC player by expanding into new growth areas of infrastructure, mobile, solutions and services. This transformation together with Lenovo's world-changing innovation is building a more inclusive, trustworthy, and sustainable digital society for everyone, everywhere. To find out more visit [About the Company | Lenovo US](#) to read about the latest news via our [StoryHub](#).

- The Intelligent Devices Group (IDG) is a global operation comprised of the PCs and Smart Devices (PCSD) business unit and the Mobile Business Group (MBG). We have more than 30 years of experience in PCs and nearly 40 years of experience with mobile phones. Our portfolio of products, solutions, software, and services ranges from PCs and smartphones to smart collaboration and augmented and virtual reality (AR/VR) solutions.

- The Infrastructure Solutions Group (ISG) is a smart infrastructure solutions provider to organizations of all sizes, includes servers, storage, networking and software.
- The Solutions & Services Group (SSG) focused on Smart Verticals & Services, which will spearhead the company's transformation by delivering incremental business across smart verticals, attached services, managed services and our "as a service offerings" including DaaS and Truscale™.

Lenovo is devoted to conduct socially, environmentally, and ethically responsible sourcing and responsible business practices with our products, employees, sites, and suppliers. A full overview of Lenovo including our products, culture, and management as well as our Conflict Minerals policy can be found on [About the Company | Lenovo US](#) or [Lenovo Sustainability Resources | Lenovo US](#).

Conflict Minerals Policy: [Lenovo's Policy on Responsible Sourcing of Raw Materials](#)

Section 1 - Conflict Minerals Disclosures

In 2022, Lenovo utilized the internationally recognized [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#) framework for our conflict minerals efforts.

Lenovo also utilized industry standard protocols for responsible sourcing programs to help drive a common industry approach complementing hundreds of other major international company's efforts, to optimize for a more efficient and effective due diligence effort and to address key non-governmental organization's expectations. The protocols include:

[Responsible Business Alliance](#) (RBA) Programs

- ✓ [Responsible Minerals Initiative](#) (RMI)
- ✓ [Conflict Minerals Reporting Template](#) (CMRT) & [Extended Minerals Reporting Template](#) (EMRT)
- ✓ [Responsible Minerals Assurance Process](#) (RMAP)

Lenovo is committed to working towards sourcing only minerals from conflict-free compliant sources that are audited and verified by recognized independent bodies. Our efforts are summarized in this Specialized Disclosure and described in further detail in the Lenovo Conflict Minerals report.

We have concluded in good faith that during 2022 Lenovo:

- a) Based on the results of RCOI and good faith efforts, Lenovo did have reason to believe that certain conflict minerals contained in our 2022 products may have originated in the Covered Countries and may not have been from recycled or scrap sources.
- b) Therefore, Lenovo conducted Due Diligence on the source and custody of our conflict minerals in our products and created a Conflict Minerals Report with the required elements.
- c) It is important to note that Lenovo, while complying with the Dodd-Frank ruling across our operations, had exceeded the requirements thereof in three regards:
 - i. Lenovo is not subject to the ruling requirements and has not filed reports to the Security Exchange Commission in 2022 or any prior year.



- ii. While only less than half of our suppliers based on procurement spending must legally comply with Dodd-Frank, we contractually required due diligence with suppliers and all their upstream suppliers.
- iii. We complied with the ruling even though most of Lenovo’s procurement operations are not “contract to manufacture” and are more purchase complete/final assembly and as such are not subject to the ruling. Much of the procurement spend was for industry standard parts not manufactured specifically for Lenovo. The majority of our procurement and supplier contracts do not specify parts, ingredients, or components as we did not specify contract terms that directly related to manufacturing of the product. We only stipulated prices, warranties, legal and other standard terms.

Section 2 – Conflict Minerals Report

Lenovo’s 2022 Conflict Minerals Report is located at:

[Lenovo Sustainability Resources | Lenovo US](#)

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SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

Lenovo Group Limited

Registrant

Signature

24 May 2023

Date

Mary Jacques, Executive Director Global ESG & Regulatory Compliance

Name and Title (Printed)

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