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Lenovo Artificial Intelligence (AI) Policy

1. Purpose

Lenovo is committed to the responsible development and use of Artificial Intelligence (AI) as a powerful and important tool for the enhancement of human capabilities. As with any new, breakthrough technology, we recognize that AI creates both benefits and risks for individual users, Lenovo, and society at large. This Policy and any associated standards and guidelines set out the driving principles that will ensure our work with AI meets the highest standards of ethics, legality, safety, security, privacy, and accountability.

2. Scope

This Policy applies to all Lenovo employees, consultants, and contractors. "Lenovo" includes Lenovo Group Limited and its subsidiaries worldwide. Throughout this Policy, "we" means anyone who must follow this policy.

AI is a computer system that performs actions normally associated with human intelligence. Subsets of AI include, but are not limited to, machine learning that can make decisions without explicit programming and deep learning that can make decisions without feature engineering or explicit programming – usually using neural networks.

Any product, service, or offering that uses AI to make predictions or classifications based on input data is an "AI system". The principles outlined in this Policy apply when Lenovo: (a) develops or acquires an AI system, (b) incorporates an AI system into a Lenovo product or service offering, or (c) deploys or otherwise uses an AI system (Lenovo- and/or third party-developed) to facilitate Lenovo operations. Examples include use of generative AI to create code, content, or materials; use of AI tools to screen candidates for hire; and Lenovo's development of AI tools, algorithms, and service features.

The provisions of this Policy apply everywhere Lenovo conducts business, with no exceptions. The development, implementation, and use of AI systems must follow all applicable laws and regulations and must comply with Lenovo's Code of Conduct and certain other applicable Corporate Policies referenced below.

3. Policy

Responsible Use of AI

3.0 We will not use AI in ways that harm people or put them or their rights at risk.

Lenovo prohibits AI systems that: (a) deploy subliminal or manipulative techniques, (b) exploit a person's vulnerabilities, (c) discriminatorily classify people based on their social behavior, socio-economic status, or sensitive personal information such as race or ethnicity, (d) use or were trained on biometric data indiscriminately scraped from social media or publicly-available information, or (e) involve the collection of sensitive personal data to enable profiling of individuals.

AI systems that pose a significant risk to a person's health, safety, or civil rights will be evaluated with additional scrutiny and risk-mitigation analysis.

3.1 We will ensure that our AI is fair, transparent, explainable, and efficient.

Principles that will serve as the basis for evaluating all AI systems throughout the organization include:

3.1a Diversity and Inclusion

Lenovo encourages responsible stewardship of trustworthy AI systems in pursuit of beneficial outcomes for individuals whose data is processed by an AI system ("subjects"), users, society, and the environment. Therefore, AI systems will be designed, implemented, and used in ways that prevent and mitigate bias and discrimination, directly or by proxy, based on characteristics protected by law such as race, color, religion, gender, gender identity or expression, national origin, ethnicity, sexual orientation, sex, age, disability, veteran status, or marital status. In determining whether to develop, use, or implement an AI system, Lenovo will evaluate it (e.g., data sets, algorithms, user interfaces) to ensure the AI system mitigates bias and ensures fair and equal treatment for all users.

AI systems must be evaluated in terms of their impact on subjects, users, society, and the environment. We will regularly review and address potential biases in AI algorithms, data sources, and decision-making frameworks to ensure fairness and equitable outcomes. Before implementation and throughout the lifecycle of an AI system, we will assess impact based on its intended use case, the end-users and/or subjects affected by the AI system, and geographic areas where the system may be deployed or used.

AI systems will be designed in a manner that avoids unfair biases, protects against the marginalization of vulnerable groups, and guards against prejudice and discrimination. By prioritizing diversity and inclusion, we strive to build AI systems that are fair and equitable, thus benefiting Lenovo, along with our employees and customers, and the broader society we serve.

3.1b Accountability and Reliability

We will assess the impact on subjects, users, and the environment throughout the lifecycle of an AI system. AI systems must include capabilities that support informed oversight and control. We will appropriately test, validate, and implement mechanisms to detect and rectify biases, errors, or unintended consequences in AI systems. By upholding accountability, we aim to build trust, drive innovation, and contribute to the responsible advancement of AI at Lenovo.

3.1c Explainability

We will strive to create and use AI systems that are explainable. Explainable AI uses processes and methods that allow users to understand, in a meaningful way, the facts and inferences behind an AI system's action. There are many different approaches to the development of AI, and some are more inherently explainable than others; a system's explainability may vary throughout its development and operation.

To the greatest extent practicable, our AI systems will be designed, implemented, and used in a way that allows for explanation of the system's decisions or outcomes. Where applicable, Lenovo may leverage explainability tools to understand the reasoning behind decisions or predictions made by an AI system.

3.1d Transparency

AI systems at Lenovo will be transparent. We will establish mechanisms to ensure transparency of the capabilities and limitations on AI systems to ensure users can make informed choices about them. More specifically, users should be: (a) informed that they are interacting with AI, (b) provided with information about how their data will be handled by the AI, (c) informed of any choices they can make regarding their interactions with AI, and (d) made aware of any rights they may have to challenge an AI-generated outcome.

AI systems should have measures in place addressing traceability during their lifecycles. They should also have measures in place to continuously assess the quality and sourcing of the data input into the AI system. The data sets and processes that yield the AI system's decisions, including data gathering, data labeling, and any algorithms used, should be documented to allow for traceability and transparency. To the extent possible, AI systems should be transparent, and should be openly communicated to those directly and indirectly affected.

3.1e Environmental and Social Impact

We will consider the impact of AI systems on the environment. We will evaluate an AI system for considerations including sustainability, conservation, and ecological stability.

Throughout the AI system lifecycle, we will also consider values such as governmental and social integrity, human rights, and the rule of law. Lenovo will implement mechanisms and safeguards that are appropriate to the context and consistent with the state of art.

By adopting a responsible approach to AI, we aim to mitigate environmental and societal risks, and to be at the forefront of sustainable innovation.

3.2. We will ensure that there is proper human oversight throughout the lifecycle of an AI system.

We firmly believe in the indispensable role of human oversight in the development and use of AI. We recognize that AI systems, while powerful and transformative, remain tools to be used in support of human endeavor and must be guided by human judgment and ethical considerations. Therefore, we will establish mechanisms for human intervention to ensure proper oversight, validity of AI outcomes, detection of potential biases, and human intervention when necessary to detect and rectify biases, errors, or unintended consequences. Significant decisions should not be based solely on the output of any AI system without human intervention.

By ensuring proper human oversight, we strive to instill trust, accountability, and fairness in our AI systems, empowering us to make informed decisions that benefit our customers, users, employees, and society as a whole.

Legal Compliance

3.3 We will protect people's privacy at all stages of the AI Lifecyle.

Privacy is an individual's right to determine for themselves when, how, and to what extent information about them is communicated to and used by others. Lenovo Corporate Policy #4 on Data Privacy sets forth Lenovo's guiding privacy principles, which include considering from the start how a proposed project or product, including an AI system, will impact the privacy of subjects whose personal data will be processed by Lenovo or a Lenovo product.

AI systems will collect and retain data from individuals only where there is a legitimate purpose, and then only to the minimum extent needed to fulfill that purpose. Wherever applicable, informed consent will be required before an AI system collects or processes personal data. AI systems will be designed to help users comply with privacy requirements, including providing to subjects the reasonable ability to review, correct, amend, or delete their personal data processed by an AI system. AI systems that process personal data will be monitored (post-release) for compliance with these principles and for data privacy incidents.

3.4 Our AI will be developed and used with robust security protections.

Technical robustness and safety require that AI systems preemptively address risks including, but not limited to, the unpredictability of AI performance and cybersecurity. We will establish standards to be used in the review, development, and operation of AI systems to ensure they are safe and reliable.

AI systems are subject to appropriate data governance and management practices as established in Corporate Policy #21 on Lenovo Product and Solutions Security Policy and as additionally required by the Legal Department and the Chief Security Office,

3.5. We will ensure that our AI respects and protects our own and others' confidential information and intellectual property.

Intellectual property concerns arise at all phases of AI development and use, including data selection and acquisition, model training and development, and operations and output. The AI systems we develop and use will comply with our Corporate Policy #6 on Intellectual Property.

A. Data and Inputs

We will own or have permission to use all data we use to train or operate AI systems. In the case of AI developed by third parties, we must both: (1) have a valid license from the supplier of the AI technology, including approved security, privacy, and intellectual property terms, and (2) conduct appropriate diligence to ensure that the developer data was rightfully obtained and used.

Importantly, this means that our **employees may not use publicly-available versions of any generative AI tool – like ChatGPT, Midjourney, and many others – for work purposes**. **Only AI tools specifically licensed and approved by Lenovo may be used.**

B. Operation and Use

We will ensure that our AI systems are not given inappropriate information or prompts, including: (1) third-party information in Lenovo's control not authorized for such use, (2) Lenovo confidential or restricted information, if the AI system is not approved for such use, (3) personal information of Lenovo employees, customers, or others who have not explicitly consented to such use, or (4) prompts or directions that would tend to create problematic, biased, or infringing results.

C. Results and Output

We will use AI systems as tools and enabling systems for our employees. In order to be protected as intellectual property, the results and decisions of AI systems may not be treated as the direct final product to be used by Lenovo or presented outside Lenovo. This is particularly important for valuable technical materials (e.g., source code, novel innovations, or inventions), economic or business outputs (e.g., financial analyses, risk assessments), or public-facing materials (e.g., marketing and branding materials, public filings). These materials are created by and the responsibility of humans, even where AI systems help in their creation.

3.6. Our AI will be developed and used in strict compliance with applicable laws.

Lenovo is dedicated to the highest standards of legal compliance in all of our worldwide operations. The laws and regulations governing AI are in a state of flux around the world and vary substantially between jurisdictions. We must comply with applicable laws and regulations in the jurisdictions where we conduct business.

Oversight and Governance

3.7 We will establish and maintain governance and review organizations to administer this Policy quickly and robustly.

This Policy will be enforced by a designated senior executive of the Company who will lead and drive its governance and implementation including:

A. **AI Ethics and Bias Mitigation:** Addressing ethical concerns, and coordinating compliance, governance, and transparency processes related to AI applications, ensuring that AI algorithms and models are fair, transparent, and unbiased.

B. **AI Legal and Regulatory Compliance:** Implementing policies and controls across the Company to ensure compliance with the letter and spirit of all applicable laws and regulations.

C. **Data Management and Governance:** Tasked with ensuring that the Company's data infrastructure is capable of handling AI applications. Establishing data governance policies to maintain data quality, security, and compliance.

This Policy will be reviewed periodically to monitor and account for changes in the regulatory landscape, commercial and technical environment, and changes in our business. Pursuant to the Lenovo Policy on Corporate and Departmental Policies, this policy must be reviewed at least annually.

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4. Related Policies and Procedures

- Lenovo Code of Conduct
- Corporate Policy #4 on Data Privacy
- Corporate Policy # 6 on Intellectual Property
- Corporate Policy #15 on Information Security
- Corporate Policy #21 on Lenovo Product and Solutions Security
- Corporate Policy #23 on Product Diversity

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5. Approval History

Version Number	Effective Date	Approved by
1.0	May 25, 2024	Lenovo Executive Committee