



Corporate Social Responsibility Policy

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1. Context

Lenovo is committed to ethical corporate citizenship and to promoting sustainability in all its activities. We demonstrate these commitments through transparent and responsible management of our social, environmental, and economic values. These values respect and are informed by those of all our stakeholders, including the communities with which we interact.

Lenovo enables social investment programs that support education, research, entrepreneurship and disaster relief.

Lenovo invests in advancing **Science, Technology, Engineering/ English, Math's Education** programs, **increasing access to technology and opportunity** for diverse underserved populations and empowering communities we work and interact with to improve their lives.

Lenovo and our employees support the needs of the communities where we live and do business through select social investment opportunities that leverage our innovation leadership and global culture. Lenovo is committed to enhancing employee awareness on all aspects of responsibility to encourage values that persuade our staff to devote their time to services involving volunteering. Our employees engage in various outreach social, environmental and educational programs including disaster relief in the local communities. We define our Corporate Responsibility by following the "making the world better because of Lenovo" principle.

1.1 Vision

Building a responsible future with Lenovo and Motorola

1.2 Mission

Lenovo's CSR mission is to empower diverse, underserved and underprivileged population by increasing access to Science, Technology, Engineering/English and Mathematics education to empower underserved and underprivileged communities with technology & opportunity in which we operate to improve their way of living. Lenovo and its employees are committed to helping those less fortunate and when disaster strikes to lending a hand to those who are in difficult circumstances.



For Motorola Mobility India Private Limited

Prashanth Mani
Managing Director and member of CSR Committee
DIN: 08199463
Date: 30.10.2020

2. Objective of the Policy

In alignment with the vision of the company, Lenovo, through its CSR initiatives will strive to support the long-term economic, social and environmental health of our company and the communities in which we operate.

This CSR policy will help establish a consistent Corporate Social Responsibility (CSR) framework in alignment with Section 135 of the Companies Act 2013 by articulating the key focus areas for Lenovo CSR in alignment to Schedule VII of Companies Act, 2013 and serve as a guidance to help define, implement, monitor and report all CSR projects undertaken under this policy.

This policy will be applicable to all CSR programs and initiatives undertaken by Lenovo and entities in India at various locations for the benefit of diverse communities in India. The framework will enable implementation of the CSR projects either directly or through capability assessed implementation agencies or chosen not for profit as implementation partners who are either a registered trust, or a registered society, or a section 8 company with an establish track record of at least 3 years in similar programs or projects.

The policy will clarify the scope and applicability of the policy, CSR governance structure, define the manner in which the CSR funds will be budgeted & allocated, scope of implementing partners & CSR projects, implementation & monitoring of the projects, treatment of unspent funds & surplus if any from the total allocated amount for CSR projects and review & amendment of the policy.

3. Scope of the Policy

This CSR policy document is applicable to the following entities currently in place and any other entities that maybe set up

- Lenovo (India) Private Limited
- Motorola Mobility India Private Limited
- Lenovo Global Technology (India) Private Limited

3.1 Core Areas

The core areas for Lenovo's CSR Policy are in alignment to the Schedule VII of the Companies Act 2013, including those in **Annexure A** of this policy:

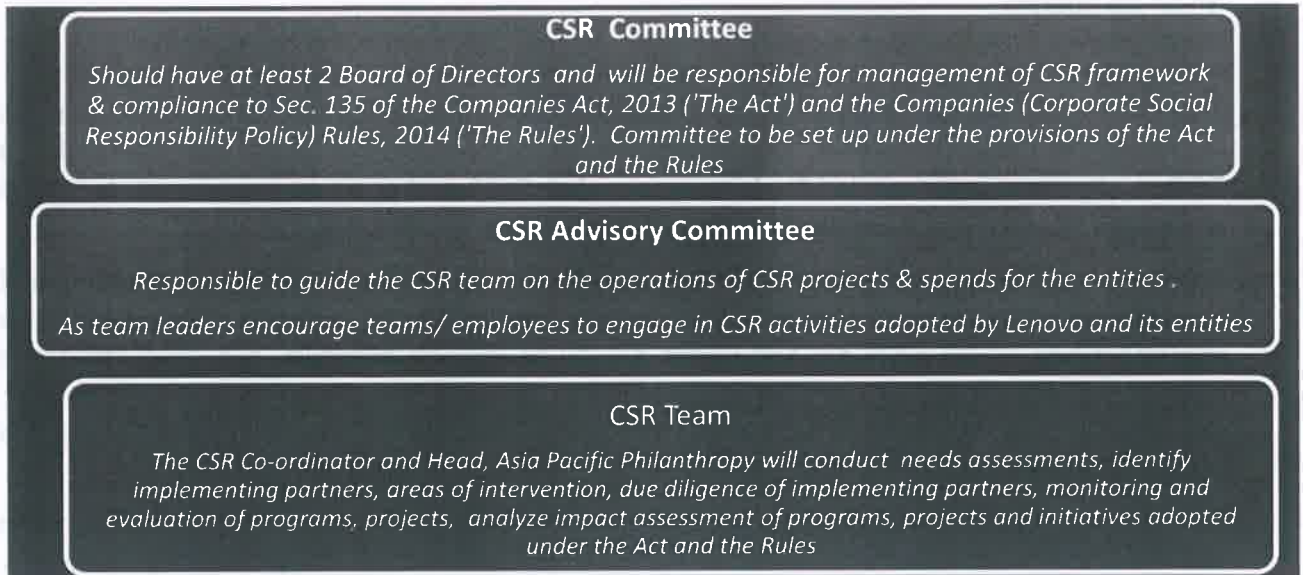


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4. Governance Structure

Accordingly, Lenovo and all entities will work closely with the CSR committee of the Board to implement the CSR activities that are approved by the Board of Lenovo.



4.1 Board of Directors of Lenovo

Members with Lenovo and other India entity Boards' known as the CSR Committee will be responsible for management of CSR framework and compliance to Section 135 of the Companies Act, 2013 ('The Act') and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (The Rules), which will decide and approve all decisions related to CSR, including approval of the CSR Policy, approval for CSR spend plans and projects and approving the annual CSR report to be submitted as per regulatory compliance. This Committee will be set up under the provisions of the Act and the Rules and will periodically review the progress of the projects under CSR and report CSR activities in the Directors' report as per format mandated by the Companies (CSR) Rules, 2014. Refer to Annexure B for the current Board of Directors of the entities.

4.2 CSR Advisory Committee

The CSR Committee at the Board level will be supported by the CSR Advisory Committee who will guide the CSR Team. The CSR Advisory Committee will advise the CSR team to ensure measures are taken to implement CSR activities and recommendations to the CSR Committee for approval of these projects under CSR mandates as well as report progress on CSR activities to the CSR Committee on a periodic basis

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4.3 CSR Team

Responsibilities of the CSR Team will include:

- Formulating the CSR Policy document and making amendments as required
- Work across cross-functional teams (Legal, HR, Finance, Vendor Management, Procurement, etc.) in the organization and external stakeholders to co-ordinate, implement and manage CSR projects.
- Build strategy and strong partnerships to ensure and increase the impact of the company's CSR activities
- Identifying organizations, due diligence of the implementing partners and conducting needs assessments for programs, projects and initiatives being selected
- Periodically review project progress and report to the CSR Committee

4.4 Frequency of meetings:

The CSR Advisory Committee will meet at least 4 times a year to evaluate the projects presented by the CSR Team, share update on the progress of the projects and present plan for Board approval.

The CSR Committee shall meet at least once every financial year.

5. CSR Budget and Funding:

The CSR Committees & the Board of Directors for the above listed entities have agreed to spend, in every financial year, at least 2% of the average net profits of Lenovo and its entities made during the three immediately preceding financial years. For new entities where the period of three financial years since its incorporation has not been completed, during such immediately preceding financial years, in pursuance of its Corporate Social Responsibility Policy.

In case of unspent amount **not related to any on-going project within Lenovo and its entities** then such amounts shall be **transferred to a Fund specified in Schedule VII, within a period of six months** of the expiry of the financial year.

The proposed spend at an entity level will be aggregated for each company. Any surplus arising from the CSR Activities will not be treated as business profits and guidance as per clause 5.1 will be followed

The Committee is entitled to recommend a higher amount than that specified in the Companies Act 2013 based on financial and other considerations.

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5.1 Treatment of Surpluses

Any surplus generated from CSR projects undertaken shall be channelized into the CSR corpus. These funds shall further only be used in development of the CSR projects and shall not be added to the profits of the Company.

This sum shall be spent by Lenovo and its entities in pursuance of its obligation towards the Corporate Social Responsibility Policy within a period of three (3) financial years from the date of such transfer, failing which Lenovo and its entities shall transfer the same to a Fund specified in Schedule VII, within a period of 30 days from the date of the completion of the third financial year.

The above stated clause 5 is subject to any amendments as notified from time to time under the Indian Companies Act, 2013.

6. CSR Implementation & Monitoring:

The CSR Advisory Committee will advise the CSR team on CSR mandates, will short list the organizations evaluated as potential partners and will manage the operations of the CSR spends for the entities with implementing plans drawn up by the CSR team.

The CSR Committees for respective entity will review the annual project list and provide its approval for execution. The CSR Team will provide quarterly report on the progress & project implementation.

The modalities of execution for all projects will be defined in partnership with the executing agency. The preferred option for Lenovo and its entities is to allow the Charity Partner to lead the on field execution while the Lenovo CSR team will perform monitoring & evaluation, project management and impact assessment internally and or through a third party vendor providing such services.

Each project will be formally evaluated based on impact, timely completion & quality of work as per the project proposal. The implementation schedule for such projects will be individually defined & measured. All Charities under the program will be obligated to send monthly/ quarterly reports on the fund spend, impact, project status and upcoming challenges. The Lenovo CSR Team will monitor independently the utilization & spends by providing Quarterly Updates to the CSR Committees.

An annual exercise will be conducted to review the roadmap for the current year based on the previous year's performance and impact which will cover:

- Creation of a summary report for previous year's performance
- Selection of focus areas for the year with well-defined approach for the year that provides a roadmap to achieve the stated objectives
- Selection of implementing partners with an annual budget
- Tracking of expenses and regular periodic review of expenses against the annual budget

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- Monitoring progress of initiatives with strong processes for funds transfer to beneficiaries and implementation partners
- Measuring end-beneficiary impact and auditing effectiveness of implementing partners
- Ensuring compliance to regulatory requirements and publishing of annual CSR reports.

7. Partners

7.1 Implementing Partner

Partnering with registered trust or registered society or Section 8 that operate in Lenovo's core CSR areas of interest and or under Schedule VII of the CSR Act, 2013 with at least three (3) years track record. These partners will provide support for project identification, execution, on-ground implementation, monitoring & evaluation as per indicators identified and measure impact on the basis of pre-defined metrics. Due diligence of these organizations will be conducted either internally or through a third party organization that provides such services. The implementing partners may have to provide regular data on pre-defined indicators to Lenovo and its entities or through a third-party organization that provides such services. All programs and projects being initiated through implementing partners will be undertaken through contracts and Memorandum of Understanding for the project period timelines.

1. CSR Projects

CSR programs and projects will be designed for a minimum of 2 to 3 years to gauge and deliver measurable impact on the communities in which the interventions are being adopted and to build impactful partnerships. In exceptional cases, where the need is high, projects with a 12-month span could be considered.

2. Review and Amendment in the Corporate Social Responsibility Policy

The CSR Boards of Lenovo and its entities shall review the CSR policy annually and may amend or modify this policy in whole or in part so long as it is not inconsistent with the provisions of the Act and Rules as and when notified by the Ministry of Corporate Affairs

3. Local CSR Policy & Procedures

Lenovo and its entities operate in many markets and geographies and there is an overall intention to comply with applicable requirements. Accordingly, if a provision of this policy conflicts with the applicable local legal requirements, Lenovo and its entities will adopt country specific policies on this subject to accommodate local regulations / legal requirements.

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For any queries and clarifications, please contact: csrindia@lenovo.com

Annexure A: Companies Act – Schedule VII (Section 135)

Activities which may be included by companies in their Corporate Social Responsibility Policies Activities relating to:—

- (i) eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water;
- (ii) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- (iii) promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- (iv) ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water 48[including contribution to the Clean Ganga Fund setup by the Central Government for rejuvenation of river Ganga;
- (v) protection of National Heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional arts and handicrafts;
- (vi) measure for the benefit of armed force veterans, war widows and their dependents. (Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows];
- (vii) training to promote rural sports, nationally recognized sports, Paralympic sports and Olympics sports;
- (viii) contribution to the Prime Minister's National Relief Fund (or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Schedule Tribes, other backward classes, minorities and women;
- (ix) Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and contributions to public funded Universities, Indian Institute of Technology (IITs), National Laboratories and Autonomous Bodies (established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of Scientific and Industrial Research (CSIR),

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Department of Atomic Energy (DAE), Defence Research and Development Organisation (DRDO), Department of Science and Technology (DST), Ministry of Electronics and Information Technology) engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs);

(x) rural development projects.

(xi) slum area development.

Explanation.- For the purposes of this item, the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.

(xii) disaster management, including relief, rehabilitation and reconstruction activities.

References: (is only for reference)

- Companies Act 2013
- Companies (Amendment) Act, 2019 dated 31.07.2019 (Not yet Notified).
- Section 135 of Companies Act 2013
- Schedule VII of Companies Act 2013
- Leading Practice
- Companies (Corporate Social Responsibility Policy) Rules 2014
- Corrigenda MCA, 31 March 2014
- Notification MCA, 27 Feb 2014
- Notification MCA, 6 Aug 2014
- General Circular No. 21/2014 MCA
- Corrigenda MCA, 31 March 2014
- Notification MCA, 27 Feb 2014
- Notification MCA, 6 Aug 2014
- Notified vide Gazette notification dated 02 April 2014 vide circular of Ministry of Corporate Affairs dated 31 March 2014.
- Notified vide notification by Ministry of Corporate Affairs dated 24 October 2014
- Notified vide notification by Ministry of Corporate Affairs dated 24 October 2014
- Notified vide The Gazette of India circular by Ministry of Corporate Affairs dated 6 August 2014



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Annexure B – List of focus areas and members of CSR Board and Committee

Lenovo (India) Private Limited

Focus Areas	CSR Advisory	CSR Committee
Technology in Quality Education Youth mobilization through skill development Women Entrepreneurs	Subhankar Roy Chowdhury Shrikanth R. Dhanakshirur Amit Doshi Rohit Sandal	Rahul Agarwal Nitin Garg Alok Garodia (resigned as on 30.09.2020)

Motorola Mobility India Private Limited

Focus Areas	CSR Advisory	CSR Committee
Education & Skill Development Healthcare & related programs	Subhankar Roy Chowdhury Pathy RVC Shrikanth R. Dhanakshirur	Prashanth Mani Rama Pillai Chima Pillai Shashank Sharma (resigned as on 19.7.2019)

Lenovo Global Technology (India) Private Limited

Focus Areas	CSR Advisory	CSR Committee
Technology in Quality Education Youth mobilization through skill development Women Entrepreneurs	To be formulated	Vivek Sharma Shobhashri Manduru Krishnaih Shivasankar Krishnamurthi

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Managing Director and member of CSR Committee
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Approved by:	CSR Committee
Approved as of :	May 2020
Last updated:	October 2020



For Motorola Mobility India Private Limited

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**CSR Projects approved by Board – Motorola Mobility India Private Limited
for FY20-21**

Sl No	Name of Project	Item from list of activities under Scheduled VII	Amount allocated for the project	Mode of Implementation
				Through Implementing Agency
1	Remote Learning Program	COVID Relief, Promoting Education	744,000	1. ATMA Foundation 2. AGAPE 3. Meghshala 4. Kasturi Trust
2	STEM Learning and Science Center	Promoting Education	1,400,000	Agastya International Foundation
3	Technology support for Teacher Training	Promoting Education	2,216,000	Meghshala Trust
4	Skill development of migrant workers on digital literacy	Livelihood Enhancement	580,000	Give India
5	Campus to Corporate Careers Program	Employment enhancing vocation skills especially among women, Empowering women	1,000,000	TNS India Foundation
6	Teacher Upskilling Program	Promoting Education	1,232,812	ICT Academy of Tamil Nadu
7	COVID 19 Project	COVID Relief	300,000	World Vision India
8	Project Monitoring and Evaluation Cost	NA	450,000	Nextgen Project Management Systems Private Limited
9	CSR Agency Cost	NA	511,201	Infiniminds
			84,34,013	

Applicable Budget (2% of Avg net profits)	84,34,000
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