

LENOVO GROUP LIMITED

(the “Company”)

SHAREHOLDERS COMMUNICATION POLICY

(the “Policy”)

(As adopted by the Board of Directors on February 8, 2012)

1. Introduction and Purpose

This Policy aims to set out the standards and the requirements of the Company in relation to communicating with its shareholders, both individual and institutional (collectively, “Shareholders”).

The Company believes that effective communication with Shareholders is essential for enhancing investor relations and investor understanding of the business performance and strategies of the Company and its subsidiaries (collectively, “Group”). The Company also recognizes the importance of transparency and timely disclosure of corporate information, which will enable Shareholders and investors to make the best investment decisions. To achieve this, the Company communicates with Shareholders through various formal channels of communication to ensure fair disclosure and comprehensive and transparent reporting of its performance and activities.

2. General Policy

- 2.1 The board of directors of the Company (“Board”) shall maintain an on-going dialogue with Shareholders and the investment community, and will regularly review this Policy to ensure its effectiveness.
- 2.2 Information shall be communicated to Shareholders and the investment community mainly through the Company’s financial reports, annual general meetings and other general meetings that may be convened, as well as by making available all the disclosures submitted to The Stock Exchange of Hong Kong Limited and its corporate communication documents ^{Note} on both the Company’s and Hong Kong Exchanges and Clearing Limited’s websites.

Note: Corporate communication documents refer to any document issued or to be issued by the Company for information or action of holders of any of its securities, including but not limited to annual/interim reports, notices, listing documents, circulars and other publications.

- 2.3 Effective and timely dissemination of information to Shareholders and the investment community shall be ensured at all time.

3. Communication Strategies

Enquiries

- 3.1 Shareholders should direct their questions about their shareholdings to Tricor Abacus Limited, the share registrar of the Company.
- 3.2 Shareholders and the investment community may at any time make a request for the Company's information to the extent such information is publicly available.
- 3.3. Shareholders and the investment community can contact the Company at any time by email, phone or in writing to make any query in respect of the Company. The contact details of designated company executives available to provide information to Shareholders and the investment community upon request are included at the end of this Policy.

Corporate Communication Documents

- 3.4 Corporate communication documents will be provided to Shareholders in plain language and in both English and Chinese versions to facilitate Shareholders' understanding. Shareholders have the right to choose the language (either English version or Chinese version only or both English and Chinese versions) or means of receipt of the corporate communication documents (in hard copy or through electronic means).
- 3.5 Shareholders are encouraged to receive corporate communication documents electronically which helps conserve the environment, save costs and facilitate timely and effective communications.
- 3.6 Corporate communication documents are made available on the Company's website www.lenovo.com/hk/publication and Hong Kong Exchanges and Clearing Limited's website www.hkexnews.hk to enable broader access to Company information by investors and other stakeholders.

Company Website

- 3.7 A dedicated Investor Relations section http://www.lenovo.com/ww/lenovo/investor_relations.html is available on the Company's website. Information on the Company's website is updated on a regular basis.
- 3.8 Information released by the Company to Hong Kong Exchanges and Clearing Limited is also posted on the Company's website immediately thereafter. Such information includes financial statements, results announcements, circulars and notices of general meetings etc.
- 3.9 Relevant news releases, company financial statements, results announcements, financial data and investment presentations for the preceding years will be available on the Company's website.

Teleconference and Webcasts

- 3.10 Where appropriate, the Company will utilize teleconferencing and/or webcasting for analyst/media briefings. Webcasts of the Company's quarterly, interim and annual results briefings are available on the Company's website.

Meetings with Shareholders

- 3.11 The annual general meeting and other general meetings of the Company are the primary forum for communication by the Company with its Shareholders and for Shareholder participation. The Board encourages Shareholders to participate in general meetings as it provides a valuable opportunity to discuss the Company, its corporate governance and other important matters.
- 3.12 All notice of meetings and related explanatory information will be posted on the Company's website upon dispatch to Shareholders. The Company will endeavour to draft notices and accompanying explanatory information in a matter that is clear and concise so it will be easy to understand.
- 3.13 To facilitate effective communication at general meetings, appropriate arrangement for the annual general meetings shall be in place to encourage Shareholders' participation and the Shareholders will be provided a reasonable opportunity to ask questions of the Directors.
- 3.14 The Chairman of the Board as well as chairmen of the Board committees or in their absence, other members of the respective committees and, where applicable, the independent professional consultant should be present and available to answer questions at general meetings. The external auditors should also be present to address Shareholders' queries about the conduct of the audit, the preparation and content of the auditors' report, the accounting policies and auditor independence at the general meetings.

Investment Community Communications

- 3.15 Investor/analysts briefings and one-on-one meetings, global investor road shows, conference calls, site visits, annual analyst roundtable etc. will be available on a regular basis in order to facilitate communication between the Company, Shareholders and the investment community, and to enhance equity analysts' in-depth understanding in its specific business segment.
- 3.16 As a standard part of the investors relations program to maintain a constant dialogue of the Group's performance and objectives, senior executives hold regular briefings and attend conferences with institutional investors and financial analysts.

4. Contacts Details

Shareholders, investors and members of the public should direct their questions about their shareholdings to our Share Registrar. The contact details for the Share Registrar are:

Tricor Abacus Limited
17/F, Far East Finance Centre
16 Harcourt Road, Hong Kong

Telephone: (852) 2980 1333
Facsimile: (852) 2810 8185
Email: is-enquiries@hk.tricorglobal.com
Website: www.tricoris.com

If your query relates to investor relations, please contact us at:

Group Investor Relations
Lenovo Group Limited
23rd Floor, Lincoln House, Taikoo Place,
979 King's Road, Quarry Bay,
Hong Kong
Telephone: (852) 2590 0228
Facsimile: (852) 2516 5384
Email: ir@lenovo.com

Or if your query relates to the corporate governance items on the website, please contact us at:

Company Secretary
Lenovo Group Limited
23rd Floor, Lincoln House, Taikoo Place,
979 King's Road, Quarry Bay,
Hong Kong
Telephone: (852) 2516 4700
Facsimile: (852) 2219 9766
Email: companysecretary@lenovo.com

5. Review and Amendments of the Policy

- 5.1 The Nomination and Governance Committee has been delegated with authority by the Board to oversee and regularly review this Policy and recommend any changes to the Board for its consideration and approval.
- 5.2 Any amendment to this Policy must be approved by the Board.