

	Global Policy	Prepared by Amanda Lockley & Marie Enemark Olsen Date 06/01/2025	Approved by Annette Stube Date 09/05/2025	Version	Page
				1	1/2

The LEGO Group Policy Statement on Conflict Minerals

At the LEGO Group, we aim to have a positive impact on society and the environment and protect the LEGO Brand by implementing the Responsible Business Principles (RBP) across our supply chain, licensing business and production sites. We want to conduct business in a responsible way and do our utmost to prevent and mitigate adverse human rights impacts wherever we operate. This is embedded in our values and our 'People & Planet Promise' and is reflected in our long-standing membership of the UN Global Compact.

In alignment with the EU Conflict Minerals Regulation, we commit to annual public disclosures on our mineral supply chain due diligence efforts. Our disclosures will adhere to best practices, aiming to ensure transparency and accountability across our supply chain. As affiliate members of the **Responsible Business Alliance (RBA)**, we follow the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. We are committed to ensuring that minerals used in our products are sourced responsibly and do not contribute to conflicts in the Democratic Republic of Congo (DRC), surrounding countries, or any other conflict-affected and high-risk areas (CAHRAs). We recognise that mineral profits in such regions may be used to finance violence and humanitarian crisis, and we are actively working to prevent these outcomes through rigorous supply chain due diligence. The term conflict minerals refer to the following: Wolframite (Tungsten), Coltan (Tantalum), Cassiterite (Tin), and Gold (also known as **3TG**). The LEGO Group uses electronic and metal components in a number of products, all of which are purchased from third-party suppliers. A small proportion of these components may contain 3TG. The LEGO Group is a member of the Responsible Minerals Initiative (RMI) through which we implement minerals supply chain due diligence using industry recognized tools and resources, such as the [Conflict Minerals Reporting Template](#) (CMRT) tool and an electronic due-diligence tool, the Responsible Minerals Assurance Process (RMAP), to audit smelters, which are a key element in the supply chain for determining the origin of relevant minerals. Education and guidance related to conflict minerals management and how to use the reporting tools will be provided to suppliers.

The LEGO Group does not prohibit sourcing of 3TG from DRC and surrounding countries but requires suppliers to use smelters and refiners that are part of the **Responsible Minerals Assurance Process (RMAP)** or an equivalent globally recognised programme as approved by the LEGO Group.

The LEGO Group requirements on conflict-free mineral sourcing

We request all suppliers and licensing partners producing electronic or metal components for LEGO® products to comply with the following requirements:

- To undertake risk-based due-diligence to disclose whether 3TG are used in the components they supply to the LEGO Group
- To uphold transparency and declare the source and origin of any 3TG used in components supplied to the LEGO Group
- To ensure that 3TG are sourced from 'conflict free' smelters and refiners
- To provide supporting data that accurately reflects supplier sourcing practices
- To undergo an RMAP audit if new smelters and refiners are identified



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			1	2/2

The declaration on 3TGs must be in a format and frequency as determined by the LEGO Group. We reserve the right at any time to require additional documentation and to conduct appropriate audits to verify the type and source of minerals and metals used in products supplied to the LEGO Group.

If we become aware of a supplier using 3TG minerals that are not sourced through the RMAP or an equivalent program recognized by the LEGO Group, we will work closely with the supplier to address and remediate the situation promptly. The LEGO Group is committed to supporting suppliers in strengthening their responsible sourcing practices. If, after collaborative efforts, a supplier does not demonstrate progress in meeting our conflict minerals policy and fails to address risks associated with high-risk areas, we may terminate the relationship following clear procedures.