Responsibility and Human Rights Policy

Objective
Since our founding, the LEGO Group has operated under the spirit: *Only the best is good enough*. As a family owned company it has been critical never to compromise this focus. The values and principles behind our Corporate Responsibility Policy have governed the way we operate and behave towards our stakeholders. Our explicit policy is to comply with the letter as well as the spirit of laws and regulations in the countries where we operate and to act in an ethical manner.

Global developments call on us to state the Human Rights part of our responsibility commitment even more specifically. We know that every day we impact human beings globally through our products, operations and business relationships. We want - and have a responsibility – to ensure that the impact is positive. The LEGO Group does its utmost to prevent and mitigate adverse human rights impacts and capitalize on the positive ones.

This policy reflects our continued commitment to our LEGO Brand Framework and to the UN Global Compact, the UN ‘Respect, Protect, and Remedy Framework’ and it’s ‘Guiding Principles’. It supports the gradual process of integrating the appropriate and required due diligence principles into our daily work. The policy covers all aspects of our value chain. It applies to all LEGO branded products and services.

The LEGO Group Way
The LEGO Brand Framework supports our responsibility, human rights commitments and promises to our stakeholders. Some stakeholders are more affected, negatively and positively, by our activities than others:

- **Children (Play Promise).** We provide play materials to children, and the best interest of the child is at the core of our values. It is of paramount importance to us that children’s rights are respected in our activities. This means never compromising the quality and safety of our products and safeguarding the children we engage directly with. Also, we recognise our unique position to support some child rights proactively – our main focus is Children’s development and the importance play has in this connection.

- **Employees (People Promise).** The LEGO Group is strongly committed to ensure that all LEGO employees are treated with equal respect and dignity and enjoy decent and motivating working conditions. Our ambition is to remain a workplace of high standards where the international labour rights of employees are highly prioritized and realized.

- **Partners (Partner Promise).** We require that our suppliers and close partners treat their employees in line with this Policy and we promote responsible sourcing. Suppliers and close partners sign our Supplier Code of Conduct - and we engage in dialogue and based on risk evaluations conduct third-party audits to monitor its implementation, while we seek to increase our leverage in the chain.

- **Local communities (Planet Promise).** We strive to minimize the negative and provide a positive impact on global society and the local communities impacted by our operations and presence. A respectful stakeholder dialogue underpins our work, and ensures that we engage constructively and openly with the stakeholders affected.
To secure Governance and Accountability, we continuously strive to integrate responsibility and human rights into the core business and embed operational management into relevant functions of the organisation. This includes maintaining, implementing and monitoring performance against the commitments of this Policy.

Where to find more information / whom to contact:
Senior Vice President, Robbert N. Stecher
Corporate Affairs