



<b>Corporate Policy</b>	Document Owner	Approved by Date	Review date	Effective date	Version	Language	Page
	Tim Brooks Prepared by Mikaela King-Stevens	Corporate Compliance Board 11/4/2022	11/4/2024	1/1/2023	1	English	1
Title	Human Rights and the Rights of Children Policy						
Location	Covers all legal entities						

## Human rights and the rights of children

### Policy Objectives:

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, principles and promises behind our [LEGO brand framework](#) governs the way we operate and underpins our corporate responsibility, human rights commitments and how we behave towards our stakeholders which is outlined in our Play, People, Partner and Planet Promises.

The LEGO Group is committed to maintaining the highest ethical standards in everything we do and conducting business with high integrity, social responsibility and in adherence with anti-corruption standards.

We know that every day we impact people and the environment globally through our products, operations, and business relationships. We want - and have a responsibility - to not only ensure that the impact is positive and to acknowledge the potential risks of adverse impacts on human rights and the rights of children. The LEGO Group therefore understands the importance and our commitment to do the utmost to assess, address, prevent and mitigate adverse impacts, and maximise the positive ones, in all our business dealings.

As the first toy company to join in 2003, this policy reflects our continued commitment to the UN Global Compact alongside our LEGO Brand Framework and the UN Guiding Principles (UNGPs) on Business and Human Rights: implementing the 'Respect, Protect, and Remedy Framework'. We integrate these due diligence principles into our daily work, to allow for pro-active management of risks in our value chain. The policy therefore covers all aspects of our value chain and applies to all LEGO branded products and services.

### **The LEGO Group Human Rights commitments:**

- The LEGO Group have a long-term commitment to the **UN Global Compact**, the **UN Guiding Principles on Business and Human Rights**, the **UN Children's Rights and Business Principles** and the Sustainable Development Goals.
- We are **committed to comply with the letter as well as the spirit of laws and regulations in the countries where we operate**, ensuring we are meeting human rights principles and international human rights standards where these are higher than the law. We are dedicated to only working with suppliers and partners that share this commitment
- We are committed to providing **access to grievance** for employees, workers in our supply chain and our customers to enable the reporting and addressing of any human rights concerns.
- We are committed to co-ordinating with stakeholders to provide **access to remedy** where appropriate
- We are committed to taking a **zero-tolerance approach to forced or child labour<sup>1</sup>** in our supply chain
- Our commitment to **respecting and supporting Children's rights** is of the highest priority to the LEGO Group, wherever we may have a direct impact, or where our partners act on our behalf. An essential part of this commitment is our effort to combat exploitation of children in any form. Respecting and supporting children's rights includes but is not limited to the right to play, education, family life, privacy, an adequate standard of living and to be protected from abuse and harm.

### Key Impact Areas:

#### **We aim to positively impact all throughout our value chain:**

##### **1) Our People**

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.

<sup>1</sup> Based on ILO Conventions 33, 138, 182; ILO Recommendations 146, 190; UN Convention of the Rights of the Child; The Children's Rights and Business Principles 1, 2, 10.



<b>Corporate Policy</b>	Document Owner	Approved by Date	Review date	Effective date	Version	Language	Page
	Tim Brooks Prepared by Mikaela King-Stevens	Corporate Compliance Board 11/4/2022	11/4/2024	1/1/2023	1	English	2
Title	Human Rights and the Rights of Children Policy						
Location	Covers all legal entities						

- [People & culture policy](#) - This policy defines the ambition, and direction of the LEGO Group on our company's approach to our people, organisational culture and leadership, ensuring that the LEGO Group is a high standard workplace.
- [Diversity & Inclusion \(D&I\) policy](#) - Diversity and Inclusion in the workplace are vital in reaching, inspiring, and developing all children. We succeed together in a diverse workplace where everyone can reach their full potential. Our two global D&I priorities are to value differences and improve representation.

## 2) Our Suppliers

We require that our suppliers and partners treat their employees in line with this Policy and we promote responsible sourcing in respect to both social and environmental impacts. Acceptance of and compliance with the LEGO Group Responsible Business Principles forms an integral part of every business agreement

- [Responsible Business Principles \(RBP\)](#) - Our RBP set out our expectations for our own production sites, suppliers and partners and covers 12 principles relating:
  - Ethics - Transparency & Integrity
  - People - Worker Right and Well-being
  - Children - Child Safeguarding & Family Friendly Workplaces
  - Environment - Caring for the environment

The RBP is based on national laws, international standards and applicable UN and International Labour Organisation (ILO) conventions. Suppliers and partners are responsible for ensuring compliance to the Responsibility Foundations in their own operations but also for conducting appropriate due diligence within their own supply chain, applying the Responsibility Foundations or comparable standards.

- [Conflict Minerals policy](#) - Our conflict minerals policy sets our expectations for third-party suppliers who supply electronic and metal components for several LEGO products. We follow the OECD<sup>2</sup> Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and we expect our suppliers to follow this same framework to ensure practices are in place to reasonably assure that products and components supplied to the LEGO group are sourced from conflict-free mines, smelters, and refiners.

## 3) Children

At the LEGO Group we want to inspire and develop the builders of tomorrow, and to do this, the best interest of the child<sup>3</sup> is at the core of everything we do. It is of paramount importance to us that children's rights are always respected and that we pro-actively promote the rights of children. This means creating positive change through empowering and supporting children in our communities to become creative, engaged and lifelong learners through play, as well as never compromising the quality and safety of our physical and digital products.

We are committed to Children's safety and to safeguarding children and young people whenever they meet the LEGO® Brand. This goes for both using our products, interacting with our employees, or visiting our sites and we ensure our systems and procedures always live up to the strictest demands and best practice. We have an essential role in promoting children's well-being and empowering children to navigate a digital world of increasing complexity by building new safe digital offerings. We collaborate with external experts and partners to continually assess our impacts and consult with children when doing so to ensure sustainable solutions can be realized.

There is zero tolerance for child abuse or exploitation. Child Labour<sup>4</sup> in any form is prohibited in our supply chain as detailed in the LEGO Group RBP, whereby our Child Labour Remediation processes is outlined.

## 4) Our Community & the Environment

We strive to minimize the negative and provide a positive impact on global society and the local communities impacted by our operations including creating positive social change through local engagement activities

<sup>2</sup> OECD: Organisation for Economic Co-operation and Development

<sup>3</sup> 'Children' are defined as anyone under the age of 18. 'Child Labour' prohibition as per our RBP requires "the minimum age of workers is not less than the age of completing of compulsory schooling and, in any case, not less than 15 years"

<sup>4</sup> Based on ILO Conventions 33, 138, 182; ILO Recommendations 146, 190; UN Convention of the Rights of the Child; The Children's Rights and Business Principles 1, 2, 10)



<b>Corporate Policy</b>	Document Owner	Approved by Date	Review date	Effective date	Version	Language	Page
	Tim Brooks Prepared by Mikaela King-Stevens	Corporate Compliance Board 11/4/2022	11/4/2024	1/1/2023	1	English	3
Title	Human Rights and the Rights of Children Policy						
Location	Covers all legal entities						

focused on learning through play. At the LEGO Group, we also want to play our part in building a sustainable future and making a positive impact on the planet our children will inherit. We believe that our Environmental and Social responsibilities are inherently linked and that we have a duty to ensure that human rights and the rights of children are duly considered when progressing in our environmental ambitions.

- [Environmental Policy](#) - We are working hard to achieve our environmental sustainability ambitions surrounding materials, packaging, carbon efficiency and zero waste. We strive to ensure high environmental standards across our value chain within our products, packaging, operations and suppliers.

### **Implementation & Due Diligence Processes**

The LEGO Group supports the UNGP approach to due diligence and as such follows guidance set out by the OECD due diligence guidance for responsible business conduct; we recognise the need to have processes in place to identify, prevent, mitigate, and account for how the impact on human rights is addressed. It is understood that this is an ongoing process, as risks change over time in line with operational changes or external influences. The LEGO Group is committed to implementing this policy through:

- Embedding Responsible Business Principles in ways of working and integrating into our business practices
- Monitoring the Responsible Business Principles through third party audits in our own sites, our direct suppliers and licensing partners to identify and assess adverse impacts and ensure requirements are met.
- Providing clear access to grievance channels (for employees, workers in supply chain and external stakeholders including consumers) to enable any human rights concerns to be reported and addressed. This includes our [LEGO Compliance Line](#); our global accessible channel for reporting concerns securely and safely. This is a confidential service which we communicate widely so grievances can be raised by all at any time.
- A respectful stakeholder dialogue ensuring constructive engagement with those affected by our activities
- Continuously assess and mitigate our impacts on children as a specific and vulnerable stakeholder group
- Collaborating with suppliers and affected/impacted stakeholders to provide access to remedy.
- Maintaining robust processes to address any critical non-conformities identified in our supply chain, however where no effort is taken to remediate, upholding the right to terminate the business relationships
- Providing capability building programmes for suppliers and internal colleagues
- Communicating transparently to stakeholders our aims, challenges and successes in regard to human rights, through our annual Sustainability Progress Report and further reporting such as the Modern Slavery Statement

### **Governance**

We continuously strive to integrate social and environmental responsibility including human rights and the rights of Children 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.

Although day to day management is through the teams in Environmental Responsibility & Social Responsibility supported by the wider organisation, our board of directors retain the ultimate authority and accountability, approving sustainability commitments, targets and reporting. This is supported by our Corporate Compliance Board and the internal audit committee by monitoring compliance with legislation within Corporate Social Responsibility Areas and reviewing and making recommendation on data governance, sustainability targets and reporting.

We aim to continually strengthen how we assess and address risks in our operations and value chain and as such will periodically review and update where necessary policies, processes and procedures related to Human Rights and the rights of children

### **Where to find more information / whom to contact:**

VP, Head of Environmental Responsibility – Tim Brooks  
VP, Head of Social Responsibility – Diana Ringe Krogh