



Policy	Document Owner	Approved by Date	Review date	Effective date	Version	Language	Page
	Cecilia Weckstrom	Loren I. Shuster 3/18/2020	3/18/2022	3/18/2020	1.0	English	1
Title	Diversity and Inclusion in the Workplace						
Location	Covers all legal entities						

Diversity and Inclusion in the Workplace

Purpose

At the LEGO Group, our mission is to inspire and develop the builders of tomorrow. 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.

Diversity encompasses e.g. age, gender, experience, education, ethnicity, religious, cultural backgrounds. Lifestyle and family responsibilities are other critical dimensions. We work with a broad definition of diversity and our goal is to increase representation of all dimensions to reflect the increasingly diverse global marketplace we operate in. Our priority is building a diverse and inclusive culture of play, where everyone feels valued; they belong and can contribute fully.

Scope

This policy applies to LEGO A/S and its subsidiaries.

The LEGO Group Way

Diversity and inclusion are fundamental to our Mission; People Promise and the success of our business. We work with two global priorities: valuing differences and improving representation. The first priority speaks to our commitment to building inclusive behaviours while our priority on improving representation addresses the need to continue to improve our processes and ways of working to ensure equal opportunities for all. Our approach has five levers:

- **Engage our employees in diversity and inclusion.** We want our employees to play an active part in shaping the diversity and inclusion agenda. Task forces, events and communication are essential to building awareness and ownership at all levels.
- **Build inclusion capability within our organisation.** Our leadership model emphasises the importance of inclusion. We each play a part in creating a safe space for everyone to be seen, heard, valued and respected. Leadership is the act of energising everybody every day and a responsibility we all share as employees of the LEGO Group. We strive to build inclusive behaviours in all employees through training and communication. We tailor training to address the needs and responsibilities of people leaders, recruiters, HR business partners and employees.
- **Balance global and local priorities.** We work with a Diversity & Inclusion Council, representing our diverse organisation and many locations. The Council drives global priorities and works with local and regional needs, to ensure relevance and accelerate our progress.
- **Improve HR system and processes.** Equal opportunity is critical to successful recruitment and career development. We strive to develop an organisation where employees with different backgrounds, knowledge, experiences, perspectives and beliefs can all realise their full potential. To support these goals, we continue to improve our systems, processes and daily work. We ensure the language in our job adverts is gender-neutral, strive for balanced short-



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lists and interview panels and make our commitment to diversity and inclusion visible. We invest in everyone and make lifelong learning and career development solutions available to all. We have upgraded succession planning and track pay equity globally. Our priority is providing a fair and respectful approach across all areas.

- **Monitor progress through HR metrics and insights.** On inclusion, specific questions are part of our annual employee engagement (Pulse) survey. We set and track targets for employee motivation and satisfaction every year. Additionally, we monitor and work with a subset of questions from the Pulse survey related to belonging, inclusion and psychological safety as our Inclusion Index. We strongly believe that building positive team dynamics that leverage differences and encourages the best contributions from everyone are critical to delivering on the promise of diversity and inclusion. On diversity, we have several initiatives that change and grow based on the needs of the business. One aspect is working with our talent pipeline to support a diverse population of employees. We publish our progress every year in our responsibility report.

Reporting concerns

We do not tolerate discrimination, harassment or bullying. We want all employees to share their experience and perspectives in a respectful, fair, and safe environment. For further details on our policies, including what constitutes discrimination, harassment or bullying, and our grievance procedures, please refer to your local employee handbook.

We all have a duty of care for one another and for the LEGO Group. In general, if you see or hear anything inappropriate please speak to your people leader. If you are uncomfortable doing so you can contact employee relations, your PO&D partner or the Head of Diversity & Inclusion. If you prefer to report an issue anonymously you can use the LEGO compliance line. The LEGO Compliance line is available for employees only. Business partners and other external parties, please report potential issues to legal compliance via this email address: legal.compliance@lego.com.

The LEGO Group prohibits retaliation against any individual who, in good faith, reports a suspected issue. Any instance of retaliation against an employee for reporting a concern in good faith violates our Code of Ethical Business Conduct. Such cases must be reported. However, we will not tolerate false accusations. Also, reporting an issue will not absolve an employee from the consequences of his/her own misconduct.

Roles and responsibilities

- The overall responsibility for the Diversity & Inclusion in the Workplace policy rests with the Chief People Officer (CPO).
- The CPO is part of The Corporate Compliance Board and is the highest decision authority with respect to non-compliance issues in the LEGO Group and it reports directly to the Board of Directors. The Corporate Compliance Board reviews any major non-compliance issues including the development of non-compliance reports every quarter, required by external regulations and internal policies, and sets the direction for company activities within the stewardship and compliance agenda.



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- Head of Diversity and Inclusion – responsible for the Group diversity and inclusion policy and day-to-day global D&I initiatives.
- PO&D – People Operations and Development – responsible for people processes and organisational development.
- People leaders and employees – responsible for upholding LEGO values and policies in own organisation and daily work.

Where to find more information / whom to contact

Please refer to the LEGO Responsibility Report for targets, progress and specific initiatives. More information is available to our employees through local HR policies.

Chief People Officer, People Operations & Development
Senior Director, Head of Diversity and Inclusion

Revision History

Version	Modifications	Modified by
x.y	Changes made to the document	Name of modifier