



Global Policy	Prepared by Amanda Lockley & Anne-Mette Lehm Laursen Date 06/10/2022	Approved by Tim Brooks Date 27/10/2022	Version	Page
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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 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 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.

The LEGO Group is committed to maintaining the highest ethical standards in everything we do, and sourcing conflict-free metals and minerals is part of this commitment. 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 taking steps to ensure that minerals used in our products do not support conflicts in the Democratic Republic of Congo (DCR) or surrounding countries, where profits from mining these minerals are used to finance the ongoing violence and humanitarian crisis in that region. 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 OECD-aligned minerals supply chain due diligence using industry recognized tools and resources. We conduct the necessary due diligence related to conflict minerals, as well as integrating related requirements into our supply chain management systems. Education and guidance related to conflict minerals and the reporting tool will be provided to suppliers.

The LEGO Group does not prohibit sourcing of 3TG from DCR 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 disclose whether 3TG are used in the components they supply to the LEGO Group
- To 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 reflect supplier sourcing practices
- To potentially undergo an RMAP audit if new smelters and refiners are identified

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 that are not part of the RMAP or equivalent programme approved by the LEGO Group, we will take appropriate actions to remedy the situation in a timely manner. The LEGO Group aims to support suppliers in developing their responsible sourcing processes. However, suppliers that do not take appropriate steps to comply with the LEGO Group policy on conflict minerals will be terminated.