



The LEGO Group Communication Letter on Expected Ethical, Social and Environmental Conduct

Version September 2017

To all partners of the LEGO Group,

Only the best is good enough. The LEGO Group is committed to maintaining the highest ethical standards and doing business with high integrity, social responsibility and in adherence with anti-corruption standards. Acting with integrity upholds a long company tradition and reflects our company's values of imagination, creativity, fun, learning, caring and quality.

We expect LEGO employees and partners working together with us to apply high ethical standards and principles of integrity, honesty and legality in all that they do as outlined below. We also expect our partners to ensure that anyone they engage with to perform work for the LEGO Group, also adhere to the same standards and principles.

Anti-Bribery and Corruption

The use of bribery is not accepted, including facilitation payments. Bribery is defined as anything of value given with a purpose of improperly influencing any act or decision. Corruption raises serious moral, economic and political concerns, damages trust, undermines good governance, hinders development and distorts competition. The LEGO Group is potentially accountable for your behavior if a bribe was offered or accepted in relation to a LEGO contract.

Anti-Trust/Competition Compliance

Always respect and comply with the relevant competition compliance/antitrust rules of the countries in which you operate, including, but not limited to, those rules which prohibit agreements with competitors regarding pricing, terms or conditions of sale, or allocation of products, business markets, customers or territories.

Anti-Harassment, Bullying, Victimization & Discrimination

Do not tolerate any kind of harassment, bullying, victimisation or discrimination against anyone that works for or with you. This applies in the workplace and in any work-related setting outside the workplace, e.g. business trips and work related social events.

Anti-Money Laundering

Participation in money laundering is prohibited. Money laundering is an activity that occurs when money acquired through illegal activities, including terrorism, is channeled through legal business activities. All financial transactions must be documented and made in accordance with applicable laws and regulations.

Charitable Donations

Charitable donations must never be linked to any tender or sales process, and donations must never be made with the expectation of any gain – financial or otherwise.

Children's Rights

There must be a zero tolerance for child abuse or exploitation in any form. Children must always be treated decently and respectfully. Interaction with children, both in the physical and digital worlds, must be conducted in a safe and appropriate environment.



Confidential Information

Confidential and/or business critical information must be safeguarded and must not be communicated to anyone, who are not permitted to see or know about it. Confidential information includes details about our strategy, technology, products, prices or business associates, etc.

Conflicts of Interest

Situations that creates a conflict between personal interests and business interests must be avoided.

Financial Control and Accuracy of Records

Business transactions worldwide must be properly authorized and be completely and accurately recorded on the company's books and records in accordance with International Financial Reporting Standards.

Gifts, Hospitality & Entertainment

Gifts, hospitality and entertainment must not have – or be perceived as having - undue influence on business decisions. Never directly or indirectly accept nor offer gifts, hospitality and entertainment that could be intended (or even be reasonably interpreted) as a reward or encouragement for a favor or preferential treatment, or that could create a sense of expectation or obligation on the person receiving the gifts, hospitality or entertainment.

Human Rights

Steps must be taken to protect human rights wherever you do business. The LEGO Group specifically expects suppliers to operate in keeping with our Social & Environmental Responsibility Expectations below.

Political Contributions

The LEGO name or trademark must not be used for political activities of any kind. Contributions to political parties or politicians are not allowed on behalf of the LEGO Group.

Social & Environmental Responsibility

All workers must be treated fairly and with respect. This includes payment of fair wages and avoidance of excessive working hours. They have the right to work in a safe environment, free from any form of harassment or discrimination. The use of child labor or any form of forced labor is strictly prohibited.

Steps must be taken to prevent and mitigate the environmental impacts of activities and products including systems to ^(a) reduce waste, energy and emissions, ^(b) handle chemicals in an environmentally safe way, ^(c) handle and dispose hazardous waste in an environmentally safe manner, ^(d) recycle and reuse materials and products and ^(e) implement environmental friendly technologies where possible.

For more details on the LEGO Group's expectations regarding ethical, social and environmental conduct, please contact ethics@LEGO.com.

Sincerely,

The LEGO Group
Business Conduct & Ethics