The LEGO Group CODE OF CONDUCT

Version 4.0

Introduction

True to its motto – “Only the best is good enough” - the LEGO Group intends to live up to its commitment in a new and changing world in which globalization and stakeholders set the agenda for growth and prosperity. The LEGO Group Code of Conduct encourages LEGO vendors to create and promote commitment to responsible production and business principles. The purpose is to ensure that vendors and their subcontractors produce components and supply services to the LEGO Group in an ethical manner. In this way, the LEGO Group also wishes to promote and support the principles in the Universal Declaration of Human Rights and the International Labour Organisation (ILO) conventions.

Acceptance of and compliance with this Code of Conduct form an integral part of every Business Agreement with the LEGO Group. The Code of Conduct establishes a minimum requirement and the LEGO Group urges its vendors to strive for continued improvement within all areas covered by this Code of Conduct.

The LEGO Group has taken a lead in the global toy industry by joining the UN initiative, Global Compact, in the summer of 2003. The Global Compact was announced in 1999 as a UN initiative for the business community to help promote sustainable development in the world. The LEGO Group’s participation in this initiative is relevant to the content of the Code of Conduct. The Global Compact lays down 10 principles in four important areas: human rights, labour rights, environment and anti-corruption. The LEGO Group urges all vendors to support Global Compact.

It is essential to the LEGO Group that the men and women, who take part in the production of LEGO products and components, whether in our own factories or in factories owned by vendors and their subcontractors, are treated decently and with dignity.

The LEGO Group will regularly make information on the compliance to Code of Conduct publicly available.
Application
The LEGO Group adheres to the principles of this Code of Conduct and requires that our vendors do the same by securing relevant corporate policies and setting up appropriate management systems to ensure that the requirements of the LEGO Group Code of Conduct can be met.

Vendors shall be responsible for ensuring that their subcontractors comply with the LEGO Group Code of Conduct. In the following, the term “vendor” includes any subcontractor of any vendor.

Legal Compliance
Vendors must comply with all applicable local laws, regulations and industry standards. The LEGO Group encourages its vendors to comply with ILO and UN Conventions.

Publication
Vendors must take appropriate action to ensure that the content and understanding of the LEGO Group Code of Conduct are communicated to all employees e.g. by posting on blackboards and training.

Employment Practices
Child labour must not be engaged in or benefited from.

The minimum age for fulltime employment shall not be less than the age of completion of compulsory schooling and, in any case, shall not be less than 15 years (or 14 years where established by local laws in accordance with the ILO developing-country exception). Employees under 18 years of age are not to be involved in hazardous work or to work at night regardless of the number of hours worked. For this kind of work, workers must be older than 18 years of age and vendor must comply with all local laws and regulations.

The minimum age for light work/spare time employment (work that does not interfere with education) shall not be less than 13 years (or 12 years where established by local laws in accordance with the ILO developing-country exception).

Children under the minimum fulltime employment age already employed at the time of detection must be offered education in combination with work on a part-time basis. If the child is below the local minimum age for light work/spare time employment, a redundancy payment must be provided by the vendor to the child or its family in combination with education. The LEGO Group will assist the vendor in implementing a socially responsible, corrective action plan.

In all types of work, vendor must seek to establish types of work, work schedules and labour intensity with special consideration to the worker’s young age.
If child labour is detected, then, in addition to other actions pursuant to this Code of Conduct, the LEGO Group reserves the right to involve local or international organizations to secure a proper remediation process.

The LEGO Group generally encourages the creation of apprenticeship programs compliant with local laws and regulations.

\[ILO: \text{C79, C138, C182, R146}\]

\textbf{Forced Labour and Freedom of Movement}

Forced or compulsory labour must not be used or benefited from.

Forced or compulsory labour is defined as work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered him-self voluntarily.

Employees must have the freedom of movement during the course of their employment. Guards must only be posted for normal security reasons to protect employees and the property of the company.

Personal papers, work deposits or compensation to employees must not be withheld, thereby preventing the employees from ending their employment.

\[ILO \text{ C29, C105}\]

\textbf{Coercion and Disciplinary Practices}

Physical punishment, threats of violence or other forms of mental or physical coercion or abuse must not be used.

Monetary fines or deduction in compensation as a means of disciplinary measure is not allowed.

\textbf{Discrimination}

Discrimination, directly or indirectly, in hiring and employment practices on grounds of race, colour, sex, language, religion, political or other opinion, age, national, social or ethnic origin, property, sexual orientation, birth or other status must not be engaged in or supported.

It must not be required that female employees are subjected to mandatory pregnancy tests.

It must not be required that employees are subjected to mandatory HIV/AIDS tests.

\[ILO \text{ C100, C111, C143, C158, C159}\]

\textbf{Wages, Benefits & Holidays}

Employees shall be paid a decent living wage and at least the minimum wage required under local laws and regulations. Additionally all benefits required by local laws and regulations must be provided. Wages must be paid in legal tender and not less frequently than on a monthly basis. In situations in which the
legal minimum wage does not cover a decent living wage, vendors are encouraged to provide their employees with adequate compensation to meet these needs.

Employees are entitled to sick and maternity leave as provided by local laws and regulations.

[ILO C26, C131]

**Working Hours**

LEGO Group has a fundamental belief that the maximum allowable working hours in a week shall not on a regular basis exceed 48 hours with a maximum of 60 hours per week, including overtime. Overtime hours are to be worked solely on a voluntary basis, and must be planned in a way that ensures safe and humane working conditions. Working hours must be compensated consistent with local laws and regulations.

However, the LEGO Group does accept that supplier’s employees can work more than 60 hours if it is voluntary and are permitted according to local laws and regulations.

Consecutive working days must be in accordance with local laws and regulations and, as a minimum; employees must be entitled to at least one day off per week.

[ILO C1, C14]

**Employment Terms**

Employees must be provided with written confirmation of employment terms, if and as required by local laws and regulations.

**Freedom of Association and the Right to Collective Bargaining**

The rights of the employees to choose to be a member of a trade union and to bargain collectively as permitted by local laws and regulations must not be interfered with or restricted. In situations or countries in which the rights regarding freedom of association and collective bargaining are restricted by law, parallel means to freedom of association and collective bargaining must be facilitated for all personnel by the vendor.

[ILO C87, C98, C135, C154]

**Freedom of Expression**

Retaliation practices must not be used to prevent employees from expressing dissatisfaction with their working conditions openly and in a loyal manner. Employees must be allowed to notify inspectors of any violations to this Code during monitoring visits without any retribution.

Grievance procedures must be established that provide employees with effective means to challenge disciplinary sanctions imposed upon the employees. Decisions resulting from the use of such procedures must be accepted and abided by.
**Health and Safety**

A safe and healthy working environment must be provided, in compliance with all local laws and regulations.

One or more management representatives are responsible for establishing written policies and procedures regarding health, safety, welfare and general facilities and that these policy topics are adhered to.

[ILO C155, R164, R190]

**Environment**

Local laws and regulations regarding the protection of the environment must be complied with. Vendors must strive to have management systems in place and to:
- reduce waste, energy and emissions to air, ground and water;
- handle chemicals in an environmentally safe way;
- handle, store and dispose of hazardous waste in an environmentally safe manner;
- contribute to the recycling and reuse of materials and products;
- implement environmental friendly technologies.

**Corruption and Bribery**

Bribes must not be offered, promised, given, accepted, condoned, knowingly benefited from, or demanded.

**Monitoring and Evaluation**

The LEGO Group will actively monitor and audit vendors at any time to verify compliance with this Code of Conduct. Vendors shall maintain, on site, any documentation that may be necessary to demonstrate compliance with the LEGO Group Code of Conduct.

All vendors are required to provide full access to on-site inspection, including unannounced visits, by the LEGO Group and/or its designated representatives; access to all records that might determine compliance or non-compliance with the LEGO Group Code of Conduct; access to randomly selected employees for confidential interviews during monitoring visits.

The results of all monitoring visits will be documented in a monitoring report. If an on-site inspection reveals non-compliance with this Code of Conduct the LEGO Group will enter into a constructive dialogue with the vendor in question in order to improve conditions. The LEGO Group will request adequate action plans to correct issues of non-compliance and will undertake follow-up inspections to verify that improvements are made.

________________________________________
Date

________________________________________
Vendor