

# Child protection policy



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## Objective

The LEGO Foundation engages with thousands of children within the context of the range of children's activities organised by our employees and strategic partners. We, the LEGO Foundation, are committed to taking the necessary actions to support child protection — actions aligned with this Child Protection Policy, the LEGO Brand Framework and the children's rights and business principles.

At the LEGO Foundation, we care about the well-being and safety of children and recognise our fundamental duty to care for the children with whom we engage. This Policy is our commitment to protecting these children from fundamental abuse of their rights or dignity. The LEGO Foundation has a zero tolerance policy for child abuse in any form. People working for or affiliated with the LEGO Foundation must always treat children decently and respectfully.

This policy aims to prevent, respond to and resolve any potential child abuse during children's interaction with the LEGO Foundation or LEGO Foundation employees by:

- Communicating and enforcing a zero tolerance policy for child abuse, exploitation, neglect and violence
- Promoting a common understanding of child protection issues within the LEGO Foundation context
- Facilitating best practice development across the business areas where we engage with children
- Strengthening our child protection governance, documentation and accountability

## Definition of child protection

"Child protection" is a broad term used to describe policies, standards, guidelines and procedures aimed at safeguarding children. It aims to prevent, respond to and resolve the exploitation, neglect, abuse and violence experienced by children in all settings.

## Scope of the child protection policy

The LEGO Foundation operates in different geographical contexts where ideas and legislation related to children and child protection vary. The LEGO Foundation strives to provide a positive experience for all children, and they must be treated with dignity and respect, no matter where we operate.

In accordance with the UN Convention on the Rights of the Child, a child is classed as an individual below the age of 18. This policy covers all children we engage with directly and indirectly through our strategic partners. It also includes any young people below the age of 18 who work or cooperate with the LEGO Foundation or our partners.

The key focus areas are:

- Physical abuse or ill-treatment — e.g. hitting or shaking a child
- Emotional abuse or ill-treatment — e.g. conveying to a child that he/she is worthless or inadequate
- Neglect — e.g. inadequate care or supervision, leaving a child in a dangerous situation
- Sexual abuse — sexual activity with a child below 18 years or below the age of consent in the country of operation, whether or not the child gives consent
- Commercial or other exploitation — e.g. conducting marketing that misleads children
- Online protection — e.g. inadequate data protection, online bullying or exposure to inappropriate content or contact

It is mandatory that all LEGO Foundation employees comply with this policy, including paid, unpaid, part-time and full-time employees, volunteers, interns and trustees. It is also mandatory that all LEGO Foundation partners, agency employees, contractors, consultants and others acting on behalf of the LEGO Foundation comply with this policy.

Failure to comply with this policy can result in a loss for the LEGO Foundation, the LEGO Group and/or its strategic partners, and can lead to disciplinary sanctions. In addition, the LEGO Foundation will comply with all appropriate procedures and applicable legislation.

Child abuse is intolerable and all LEGO Foundation employees and partners or affiliated parties are expected to comply with the law. It is management's responsibility to ensure that this policy is reflected in the way our business operates and in how our employees and partners behave locally. However, all adults engaged with the LEGO Foundation have an individual responsibility to safeguard children in their job, irrespective of their individual roles.

While the Child Protection Policy defines our overall commitment and expectations, it is our intention that implementation of the policy is facilitated by the LEGO Foundation implementation plan set out below by gradually developing and working with key partners to establish best practice guidelines. Guidance includes:

- Recruitment processes for screening relevant candidates to prevent unsuitable individuals from working with children within activities related to the LEGO Foundation
- Training for employees who have frequent contact with children, nurturing a child protection culture
- Contractual requirements guiding the behaviour of LEGO Foundation employees and strategic partners, so they are aware of and commit to the behaviour expected when they engage with children
- Instruments to monitor and report incidents and document precautions taken

To ensure accountability towards children, the LEGO Foundation continuously strives to integrate child protection into the core business and embed operational management into relevant functions of the organisation. This includes maintaining, implementing and monitoring performance with respect to the commitments of this policy.

The LEGO Foundation cooperates with KIRKBI Legal Affairs when providing initial guidance and training to support roll-out in the business. In case of any concerns that a child may be at risk, or if local laws challenge and contradict compliance with this policy, the LEGO Foundation Excellence Team must be consulted.

Supported by the LEGO Foundation Excellence team, this policy will be implemented in the LEGO Foundation in the most relevant way. Special attention must be given in business units with systematic and direct child engagement.

Even with the most robust mechanisms and procedures in place, incidents may still arise or situations may still create cause for concern. All employees, whether paid or unpaid, are accountable for immediately reporting breaches or suspicions of breaches of this policy to their immediate manager or to the LEGO Foundation Compliance Line and, if appropriate, to the national authorities.

## LEGO Foundation child protection principles

The LEGO Foundation:

- is committed to protecting children and ensuring that they can experience quality care and nurturing relationships.
- has put in place a policy, principles and guidelines for protecting children in all aspects of work of the LEGO Foundation staff, strategic partners, individuals and volunteers to ensure the wellbeing of children impacted by our work.
- defines child protection as respecting and protecting children and young people from maltreatment, preventing impairment of their health and cognitive, physical, social and emotional development and ensuring that children and young people feel safe to play, learn and grow.

In part of implementing the Child Protection Policy the LEGO Foundation:

- agrees that the Leadership Team and People Leaders should promote child protection and must ensure that all staff members are aware of the LEGO Foundation Child Protection Policy, Principles and Guidelines.
- decides that in the event that the LEGO Foundation Child Protection Policy standards are stricter than national legislation and/or there is a conflict between national law and the LEGO Foundation Child Protection Policy, the LEGO Foundation staff members and eligible partners should immediately consult with the LEGO Foundation.
- recognizes a child as a human being under the age of 18 years.
- considers child protection the responsibility of every individual working with children on behalf of the LEGO Foundation.
- screens all relevant LEGO Foundation employees
- provides appropriate training/information for relevant employees, volunteers and partners
- requires relevant strategic partners to comply to the LEGO Foundation Child Protection Policy, Principles and Guidelines in contracts or statements
- requires all individuals/entities to whom this policy applies to report all concerns of abuse or potential child abuse to the relevant LEGO Foundation person or authority
- has put in place an incident reporting system for child protection

## LEGO Foundation child protection guidelines

LEGO Foundation staff, partners and other individuals representing the LEGO Foundation must never:

- hit, otherwise physically assault, or physically abuse children.
- engage in sexual activity or have a sexual relationship with anyone under the age of 18 years or below the age of consent in the country of operation. Mistaken belief in the age of a child is not a defense.
- develop relationships with children which could in any way be deemed exploitative or abusive
- act in ways that may be abusive in any way or may place a child at risk of abuse.
- use language, make suggestions or offer advice which is inappropriate, offensive or abusive
- behave physically in a manner which is inappropriate or sexually provocative

- have a child/children with whom they are working to stay overnight at their home unsupervised unless exceptional circumstances apply and previous permission has been obtained from the immediate manager
- sleep in the same bed as a child with whom they are working
- sleep in the same room as a child with whom they are working unless exceptional circumstances apply and previous permission has been obtained from the immediate manager
- do things for children of a personal nature that they can do themselves
- condone, or participate in, behaviour of children which is illegal, unsafe or abusive
- act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse
- discriminate against, show unfair differential treatment or favour to particular children to the exclusion of others.
- spend excessive time alone with children away from others in a manner which could be interpreted as inappropriate
- expose a child to inappropriate images, films and websites including pornography and extreme violence
- place themselves in a position where they are made vulnerable to allegations of misconduct

This is not an exhaustive or exclusive list. Staff, partners and other representatives should at all times avoid actions or behaviour, which may allow behaviour to be misrepresented, constitute poor practice or potentially abusive behaviour.

LEGO Foundation staff, partners and other individuals representing the LEGO Foundation must:

- listen, value and respect all children.
- talk with children, not to children.
- be friendly and smile.
- know the culture in which you are working and the appropriate behaviour and language around children.
- listen to children carefully if a child has a concern
- as a member of staff or a volunteer make the event a safe, fun, creative, learning and positive experience.
- encourage and praise achievements
- keep a friendly and positive attitude to the children
- let children know you are there to help them.
- make sure the children can easily find you and identify you as LEGO Foundation event staff.
- always remember, that you are representing the LEGO Foundation and the LEGO values.