

Anti-harassment policy



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Summary

The LEGO Foundation values positive working relationships consistent with the Foundation values. The LEGO Foundation does not tolerate any kind of harassment, bullying, victimisation or discrimination occurring in the workplace or and in any work-related setting outside the workplace, e.g. when representing the LEGO Foundation at business trips and in work-related social events.

All employees and non-employees at third parties acting on behalf of the LEGO Foundation, have a right to work in an environment free from the demoralizing effects of harassment or unwelcome offensive or improper conduct. Therefore, the LEGO Foundation expects that all relationships will be professional and free of bias, prejudice and harassment.

All employees have a personal responsibility to live up to the standards set out in this policy and for ensuring that non-employees at third parties acting on behalf of the LEGO Foundation, are aware of the principles contained within it. Third parties are signing the Code of Conduct main principles in their contract. People managers have a leadership role and are responsible for preventing harassment, bullying, victimisation or discrimination and taking prompt action, when needed.

All employees and non-employees at third parties acting on behalf of the LEGO Foundation must report breaches or suspected breaches of this policy as described below in the section on 'Handling Breaches'.

Purpose/Objective

The purpose of this policy is to make employees of the LEGO Foundation and non-employees at third parties acting on behalf of the LEGO Foundation, aware of behaviours that constitute harassment, bullying, victimisation or discrimination, and responsibility in preventing and managing such occurrences.

The intended outcome is a work environment in which all individuals are treated with respect and dignity free from all forms of harassment, bullying, victimisation or discrimination.

The LEGO Foundation will make every reasonable effort to ensure that all concerned are familiar with this policy and are aware that any complaint received about a violation of this policy will be investigated and resolved appropriately.

Scope

This policy covers harassment, bullying, victimisation or discrimination occurring in the workplace or and in any work-related setting outside the workplace (including situations originating from work-related relations), e.g. when representing the LEGO Foundation at business trips and in work-related social events. This policy applies to all employees of the LEGO Foundation and non-employees at third parties acting on behalf of the LEGO Foundation, regardless of the country or jurisdiction where they are based. Furthermore, this policy covers all possible communication channels and platforms used as a tool for harassment.

Each of us has a personal responsibility to live up to the standards set out in this policy and for ensuring that non-employees at third parties acting on behalf of the LEGO Foundation, are aware of the principles contained within it. Third parties are signing the Code of Conduct main principles

in their contract. People managers have a leadership role and are responsible for preventing harassment, bullying, victimisation or discrimination and taking prompt action if needed.

This policy covers:

- Any behaviour or series of behaviours that offend, humiliate, intimidate, belittle, undermine, scare, exclude, or shame anyone they are directed at, or anyone who sees or overhears them; and
- Any behaviour or series of behaviours which may constitute any form of discrimination.

This policy does not cover:

- Work-related interpersonal conflicts and occasional differences of opinion or disagreement with decisions which may be more appropriately addressed with HR or direct management.
- Reasonable and appropriate corrective management or performance feedback that addresses poor workplace performance or behaviour that requires corrective action.
- Enforcement of lawful and reasonable directions.

Breaches

Engaging in harassment, bullying, victimisation or discrimination occurring in the workplace or and in any work-related setting outside the workplace constitutes a breach of this policy and may result in disciplinary action including but not limited to:

- Mediation
- Counselling
- Apologies
- Written warnings
- Termination of employment

In some instances, harassment, bullying, victimisation or discrimination may also amount to a criminal offence and legal actions. If laws have been violated, the LEGO Foundation will co-operate fully with the appropriate authorities.

Disciplinary action will be taken against any individual who is found to have authorised, condoned, participated in or concealed actions that breach this policy and who retaliate, directly or indirectly, or encourage others to retaliate against an employee or non-employees at third party who reports a breach.

Handling breaches

When faced with harassment, bullying, victimisation or discrimination, the employee may opt for different courses of actions. He/she may attempt, in a first instance, to resolve the situation informally, or he/she may decide to lodge a formal complaint directly. Below are described options at the disposal of the employee, who decides which option is the most appropriate for his/her situation:

- Tell the harasser that the behaviour is unacceptable, and that it must stop. It is important to say these things to the harasser otherwise they may interpret your silence as consent. If you would feel too uncomfortable saying these things to the harasser, this will not mean that you don't have a valid claim.
- Report the behaviour or incident as soon after the event as possible to either:
 - Someone in a formal leadership capacity at the LEGO Foundation (your manager or manager's manager)
 - HR
 - [The LEGO Foundation Compliance Line](#)

When you report an incident to LEGO Foundation Compliance Line:

You can report with your name or anonymous (by creating a new email address).
The information you provide is sent to the Head of Legal of KIRKBI for appropriate review.
Reports are handled promptly and discreetly.
After reporting, you receive a confirmation email for follow-up.
If you report anonymously, please check and use the anonymous email to contact the LEGO Foundation Compliance Line again within the next week providing the Head of Legal of KIRKBI with the ability to ask you follow-up questions.

All employees or non-employees at third parties acting on our behalf have an obligation to immediately report any knowledge of breaches or suspected breaches of this policy. Non-employees at third parties should report through their LEGO Foundation employee contact.

The LEGO Foundation will handle all reports discreetly and will make every effort to protect, within the limits allowed by law, the identities of anyone reporting a possible breach. There will be no retaliation from the company for making a report. Any employee reporting in good faith a possible breach shall not be disciplined for submitting a report provided the employee is not involved in the breach.

Requirements

It is expected that employees of the LEGO Foundation and non-employees at third parties acting on behalf of the LEGO Foundation, are aware of behaviours that constitute harassment (incl. sexual harassment), bullying, victimisation or discrimination as discussed below (see definitions end of document), and they are aware of their responsibility in preventing and managing such occurrences.

It is particularly important for every employee and non-employees at third parties to conduct himself or herself in a culturally sensitive, tolerant and respectful way towards each other being particularly sensitive to actions that may be acceptable in one culture but are not in another. In all cases, care should be taken to consider if dialogue is an option to solve a potential situation.

Examples of bullying and harassment include but is not limited to:

- Verbal slandering by ridiculing or maligning a person or his or her family; persistent name calling that is hurtful, insulting or humiliating; using a person as butt of jokes; abusive and offensive remarks.
- Physical by pushing, shoving, kicking, poking, tripping, assaulting or threatening of physical assault, damaging to a person's work area or property.
- Exclusion by socially or physically excluding or disregarding a person in work-related activities.
- Repeatedly putting unreasonable pressure on staff that you manage, for example, imposing unachievable deadlines to stress employee.

Examples of sexual harassment include but is not limited to:

- Sexually oriented comments or gestures, including sexually explicit jokes.
- Physical conduct of a sexual nature ranging from unnecessary touching to sexual assault.
- Offensive phone call(s), text message(s), letter(s) or e-mail message(s).
- Showing or displaying obscene or offensive images or texts.
- Sexual advance(s), proposition(s) or pressure(s).

Roles and responsibilities

Overall accountability for compliance with the anti-harassment policy sits with the Legal Counsel.

Employees in leadership roles should always demonstrate ethical behaviour in their daily duties and ensure that their team including engaged non-employees at third parties acting on behalf of the LEGO Foundation are aware of this policy and understand it. They should also encourage open discussion regarding conduct & ethics and recognise and address incidents of unethical behaviour.

The LEGO Foundation Leadership Team must ensure that organisation set-up and appropriate procedures to support this policy are established.

Definitions (non-exhaustive list)

The following terms and definitions are used in this document:

Bullying	Bullying is offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power which is meant to bully others by fear, to threaten them, to undermine, to humiliate or injure them. This can include aggressive behaviour, intimidation, persistent criticism, undermining in front of colleagues and spreading malicious rumours.
Discrimination	Discrimination is treating a certain person or group differently based on factors such as age, race, religion or belief, national or ethnic origin, colour, gender, sexual orientation, gender reassignment, marital or civil partnership status, maternity and paternity, disability or political affiliation.
Harassment	<p>Harassment is unwanted conduct related to sex, gender reassignment, colour, race, nationality or ethnic or national origins, disability, sexual orientation, religion or belief, age or any other personal characteristic which:</p> <ul style="list-style-type: none">• has the purpose of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person; or• is reasonably considered by that person to have the effect of violating his or her dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for him or her, even if this effect was not intended by the person responsible for the conduct.
Victimisation	Victimisation is treating someone less favourably than others because he or she has, in good faith, complained (whether formally or otherwise) that someone has been bullying or harassing him/her or someone else, or supported someone to make a complaint or given evidence in relation to a complaint. This would include isolating someone because he or she has made a complaint or giving him or her worse work.
Sexual harassment	Sexual harassment is unsolicited and unwelcome sexual advances, requests for sexual favours, or other verbal or physical conduct of a sexual nature.