



The LEGO Group

Modern Slavery Statement

2025



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Introduction

Since 1932, the LEGO Group has been committed to creativity, quality, and integrity in every aspect of our business. We hold ourselves and our partners to the highest standards, ensuring that the human rights of individuals working throughout our value chain are respected.

The LEGO Group's approach to human rights due diligence is guided by, and implemented in accordance with, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. We recognise our responsibility to prevent the use of any form of forced labour or child labour. We are committed to the UN Global Compact, and work to protect workers and communities throughout our entire value chain including our own operations, direct and indirect suppliers, as well as licensing partners. We are committed to ensuring that all workers involved in the creation of LEGO® products experience fair, decent, and safe working conditions.

Our 2025 Modern Slavery Statement reflects this commitment, outlining the steps we take to address the risks of any form of modern slavery within our operations and supply chains.

In 2025, we found no instances directly related to child labor, forced labor, or modern slavery in our own operations or value chain.

This document covers the full operations of the LEGO Group, including the UK subsidiary LEGO Company Limited, the Australian subsidiary LEGO Australia Pty. Ltd, the Norwegian subsidiary LEGO Norge AS and the Canadian subsidiary LEGO Canada Inc., all of which are under the parent company of LEGO A/S. It sets out the steps taken by the LEGO Group to continue the work to assess, prevent, and mitigate the risks of modern slavery and human trafficking in business operations and supply chains, during the fiscal year from 1 January 2025, ending 31 December 2025.

This statement has been published in accordance with the requirements of the UK Modern Slavery Act (2015), the California Transparency in Supply Chains Act (2010), the Commonwealth Modern Slavery Act (2018) for Australia, The Norwegian Transparency Act (2022), and the Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act (2024).

Additional information in relation to specific subsidiaries is required in compliance with local legislation.

LEGO Australia Pty. Ltd. with an office based in North Sydney, New South Wales provides sales, marketing, and operations services with 79 employees and is incorporated under the laws of New South Wales.

LEGO Canada Inc. provides sales of LEGO products on the Canadian market with 374 employees incl. those in its office in Ontario and in the LEGO Brand Retail stores across Canada. LEGO Canada Inc. is a 100% owned subsidiary of LEGO A/S established under the laws of the province of Ontario. LEGO Australia Pty. Ltd., and LEGO Canada Inc. do not own or control any other entities.

Management and relevant employees of LEGO Australia Pty. Ltd., and LEGO Canada Inc. were involved in the preparation of this statement through the LEGO Group Human Rights & ESG Compliance team (Human Rights Team). LEGO A/S is the parent company of these two subsidiaries and as such when ensuring human rights standards in contracts with suppliers, this includes suppliers to our Australian, and Canadian entities, where alignment to the LEGO Group policies and expectation must be ensured.

Please see **LEGO Web** for appendices for LEGO Canada Inc. and LEGO Norge AS.

Value Chain and Company Structure



The LEGO Group is a privately held family-owned Danish company founded by Ole Kirk Kristiansen in 1932. The LEGO Group is owned by LEGO Holding A/S (75%) and the LEGO Foundation Investments A/S (25%). As of 31 December 2025, the annual revenue was 83.5 bDKK. Our mission is to 'inspire and develop the builders of tomorrow' by providing the best and safest play experiences to children while also delivering on our commitments to our people, partners, and the planet.

Factory	Colleagues	Function	Supplies
Billund, Denmark	705	Moulding	Europe, Middle East & Africa
Kladno, Czechia	3,164	Processing & packing	Europe, Middle East & Africa
Nyíregyháza, Hungary	3,210	Moulding, processing & packing	Europe, Middle East & Africa
Monterrey, Mexico	6,367	Moulding, processing & packing	The Americas
Jiaxing, China	1,396	Moulding, processing & packing	China and Asia
Ho Chi Minh City, Vietnam	748	Moulding, processing & packing	Asia
Colonial Heights, Virginia, USA (Temporary packing facility)	501	External packing facility	Americas
Chester, Virginia, USA (New factory opening in 2027)	Up to 1,760	Moulding, processing & packaging	Will supply Americas

Governance & Policies

Click here to find the appendices for LEGO Norge AS - Norway Transparency Act, and the joint statement for LEGO Canada Inc.



The LEGO Group's Corporate Policy Framework is guided by the LEGO® Brand Framework with a focus on contributing to a sustainable future and making a positive impact on society.

- The 'Human Rights and Children's Rights Policy' applies globally to all LEGO employees and value chain partners. This policy outlines our commitment to respecting human rights and promoting children's rights throughout our operations, value chain, and all legal entities. It is aligned with international human rights standards, including the Universal Declaration of Human Rights, the International Labour Organization (ILO) Core Conventions, the UN Convention on the Rights of the Child, and the UNICEF-backed 'Children's Rights and Business Principles'.
- The LEGO Group 'Code of Ethical Business' sets out mandatory expectations and principles on ethical conduct. It applies to all employees and third parties acting on behalf of the LEGO Group and sets out high ethical standards grounded in integrity, honesty and legality.
- The '**Responsible Business Principles**' (RBP) serves as our code of conduct, establishing clear expectations for our production sites, suppliers, and partners. The 12 Principles encompass our minimum requirements based on internationally recognised human rights, ethics, environmental practices, national laws, international standards, and applicable UN and ILO Conventions.

- The 'Conflict Minerals Policy' commits our operations and supply chain to source only from smelters and refiners that meet recognised standards. This ensures traceability of minerals in our supply chain, compliance with EU regulations and adherence to OECD guidelines and industry standards. As members of the Responsible Minerals Initiative & Responsible Business Alliance we require suppliers to implement OECD-aligned Minerals Supply Chain Due Diligence.

Governance Structure

The LEGO Group Corporate Compliance Board (CCB) approves all Sustainability and Human Rights policies while the Board of Directors (BoD) approves targets and monitors progress through the appointed Audit Committee (AC).

The CCB is the highest decision authority in the LEGO Group with respect to non-compliances and reports directly to the BoD. For an overview of our Sustainability Governance, see page 16 in the LEGO Group Annual Report 2025.

Due Diligence Processes

Maintaining robust and continuous processes to identify, prevent, mitigate, and account for any potential harm to people and the planet is of critical importance to the LEGO Group. In line with industry standards and our legal obligations, we conduct systematic and ongoing due diligence.

Our approach to Environmental and Human Rights Due Diligence (EHRDD) is anchored in six key steps, applied across our processes:

- **Commit:** We demonstrate a clear commitment to protecting and respecting human rights and the environment.
- **Embed:** Our commitments are integrated into operational procedures and policies.
- **Identify & Assess:** We employ a systematic approach to identify the most salient risks and impacts.
- **Address:** We take proactive measures to prevent, cease, mitigate, and remediate any identified risks and harms.
- **Track:** We establish key performance indicators (KPIs) to monitor the effectiveness of our risk management and mitigation efforts.
- **Report:** We transparently share information about risks and the actions taken to address them, both internally and externally.

Human rights considerations are embedded in our policies and risk management systems, including supplier risk assessments and audits, as well as our enterprise risk management process.

The LEGO Group is committed to meaningful engagement with stakeholders throughout the due diligence and remediation processes. This engagement is important for identifying and understanding the root cause of risks and existing harms. We also collaborate with expert partners to address complex issues when necessary, ensuring that our responses are appropriate and effective.

Through stakeholder feedback we continuously refine our systems and strengthen our commitment to preventing forced labour, child labour and modern slavery.

2025 actions

Throughout 2025, we have been building on our systematic human rights due diligence approach in alignment with expected future EU CSDDD requirements. Key actions include:

- We initiated a responsible recruitment pilot in high-risk regions for vulnerable workers e.g. migrant and contract labour, with selected third-party warehousing distribution partners.
- Strengthened our due diligence process for high-risk sourcing categories by acquiring an external specialised forced labour intelligence screening tool that is being integrated into our purchasing platforms.
- Strengthened our Responsible Sourcing Program with a major update of our Responsible Business Principles (RBP) particularly focusing on developing comprehensive processes and tools to identify, assess and prioritise findings.
- Leveraged memberships of multistakeholder initiatives to identify and share the best approaches to enhancing worker protection. Initiatives include the Responsible Business Alliance, the UN Global Compact, and partnerships with the Ethical Supply Chain Program who we have worked with to strengthen the Family Friendly Factory programme.
- Enhanced our enterprise risk management process to include a stronger focus on harm to people in our value chain in line with UN Guiding Principles (UNGPs). Working Conditions, Child and Forced labour are identified as key areas to monitor in our own operations and value chain.

2026 plans

In 2026 we will continue our efforts, including:

- Update our Human Rights and Children's Rights Policy.
- Develop the LEGO Group's new Human Rights strategy.
- Complete responsible recruitment pilot and address findings in collaboration with distribution suppliers. We will use the findings to inform our strategy development.

Risk Assessment & Management

Assessing and Managing Own Operations, Supplier and Partner Risk

We continuously assess our human rights risks and monitor our own operations and suppliers to ensure that requirements are met. We do so through a combination of third-party audits, internal assessments, capability building and regular dialogue to ensure that requirements are understood, and stakeholders are equipped to meet our expectations.

The LEGO Group's specific audit methodology is based on the Responsible Business Principles (RBP) and focuses on areas of concern within modern slavery, such as employment practice for vulnerable workers including migrant workers. Supplier audits are conducted based on a risk-based approach using multiple factors that will determine the applicability and frequency of audits:

- Geographic risks.
- Industry risks associated with the specific sector.
- Product risks related to the inputs and production processes involved.
- Enterprise level risks related to governance and management systems in place.

Suppliers in scope are:

- Suppliers of direct materials for the production of LEGO® sets, which include resin, packaging and electronic parts.
- Selected suppliers of indirect goods and services that are identified as high risk and using third party risks assessment.

- Licensing partners who are required to submit verified third-party audits of the manufacturing sites where goods are produced.

Our direct suppliers are predominantly located in Europe, Mexico, and China and a list of suppliers is made public on LEGO.com. In 2025, we had 121 direct suppliers.

Furthermore, we contractually require full visibility from our sub-suppliers and licensing partners for all facilities where the LEGO brand is present.

We apply the same standards and third-party audits to our own operations which include both directly employed and contracted workers.

In 2025, we had a focus on audit and capability building with direct suppliers, linked to agency workers. We engaged selected suppliers to address the specific risks to agency workers and provided them with training on related topics and human rights due diligence.

Grievance Mechanism

Grievance mechanisms play an important role in identifying and mitigating risks and serve as a channel for all employees, workers in our value chain, and external stakeholders to safely raise issues and report suspected violations of our RBP and applicable laws or regulations.

Grievances and reports can be filed confidentially and without fear of retaliation via:

- Online: [LEGO Group Speak Up Compliance Line](#).
- Online: LEGO Group Supply Chain Incident reporting website.
- Email: responsibility@LEGO.com.
- The Ethical Supply Chain Program (ESCP)

enables workers in China, Indonesia and Vietnam to also file their reports via their program.

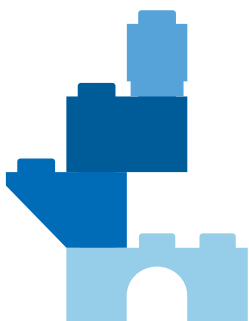
Information on the grievance mechanisms is provided to employees via training and active targeted campaigns to raise awareness. We also regularly conduct surveys to verify that all employees are aware of the various grievance mechanisms available. We conduct ongoing due diligence around the effectiveness of supplier grievance mechanisms through verification of policies and procedures and worker engagement.

We have provided licensing partners access to our supply chain helpline, and trained partners on our grievance policy and investigation toolkit.

In 2025, the LEGO Group received 24 grievances from upstream activities. Each case was thoroughly investigated and addressed through a tailored remediation plan, developed to ensure appropriate and effective resolution. All grievances have been successfully resolved or are currently in progress. No grievances were directly related to modern slavery.

Managing Identified Risks and Impacts

When assessments or audits identify risks or non-compliance with the RBP, they are graded based on severity; low, medium, high and critical. Forced or child labour are classified as zero-tolerance (critical) issues and will result in a production stop whilst we take immediate action to further evaluate the severity and implement a robust remediation plan that the supplier must commit to. Mitigation is managed by LEGO Group teams in collaboration with the relevant suppliers, and 3rd party specialists if necessary.



Measuring Effectiveness & Remediation

To ensure that our practices are efficient and relevant to our current risks, we track our progress annually through our established Key Performance Indicator (KPI) called '% of Suppliers with higher-risk non-conformities'. The KPI reflects compliance with the Responsible Business Principles (RBP) in our direct supply chain and captures the identified higher risk non-conformities incl. instances of modern slavery, forced labour, or human trafficking. The findings are identified through third-party audits and serve as a baseline for evaluating the level of risk in our supply chain.

The KPI is reported annually in our **Annual Report** page 35 and validated through a long-established accountability and governance structure.

In 2025, 20% of supplier audits found higher-risk non-conformities against a target of 33%. Higher-risk non-conformities refer to any non-conformities found in audits graded as critical or high risk per our grading matrix. None of the

identified higher-risk non-conformities were directly connected to modern slavery, forced labour, child labour or human trafficking.

This year demonstrates an improvement against 2024 where higher-risk non-conformities were identified at 26% of audited suppliers. This reflects our continuous investments in the Responsible Sourcing program and sets the foundation for us to expand the program to new categories and locations in 2026.

Beyond monitoring our externally shared KPI, we also track additional metrics to ensure the effectiveness of our detection and prevention processes. These include:

- Monitoring the number of critical non-conformities found in audits.
- Tracking the number of engagements activities with our supply chain in terms of training.
- Monitoring grievance cases reported through our various channels.
- Tracking the resolution rate of non-conformities identified during audits.

Remediation

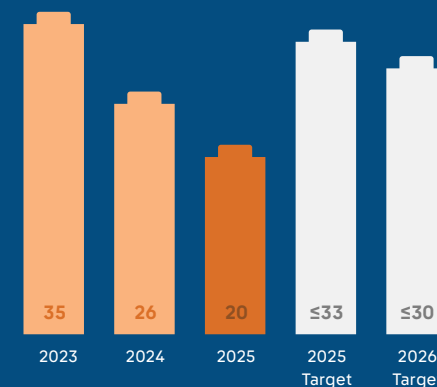
In 2025 we continued to support our suppliers in addressing and resolving remediation issues through proactive engagement, targeting capability-building programs, detailed guidance, and regular monitoring of key data points.

Among the identified non-conformities, excessive working hours was the most common finding. We investigated this further to understand root causes, particularly whether forced labour was a contributing factor. Our evaluation confirmed that in all instances, working hours were voluntary and that forced labour was neither a contributing factor nor an outcome of issues identified with working hours.

While higher-risk non-conformities related to excessive working hours are limited and, in this case not linked to forced labour, we recognise that it can significantly affect workers and their families. To address this, we are committed to supporting our suppliers in implementing robust measures to bring working hours within reasonable and sustainable limits.



Suppliers with higher risk non-conformities | % |



Training

The LEGO Group's Responsible Business Principles (RBP) e-learning is a training module designed for all salaried LEGO Group employees, covering modern slavery issues such as forced and child labour risks.

In 2025 we refreshed the e-learning to align with our updated RBP and commenced a phased roll out, beginning with key procurement colleagues in teams managing our direct suppliers. In 2025, all members of those teams participated in webinars on the updated RBP.

Regular updates on topics relevant to the RBP are provided to the LEGO Group's Procurement and Licensing teams. These activities ensure that the latest knowledge and guidelines are effectively integrated into interactions with suppliers and partners.

Board Approval

This statement covers the LEGO Group and all subsidiaries, and as such the LEGO Group Board of Directors has approved this statement on behalf of all subsidiaries.

The statement was approved by the LEGO Group Board of Directors on 4 March 2026.



Thomas Kirk Kristiansen
Chair of the Board

