

The LEGO Group Way

At the LEGO Group, we are proud of our products and play experiences and believe that these make a positive difference in children's lives (creativity, development, and learning).

We want to live up to consumer's high expectations and provide fun and engaging, as well as, safe and responsible play experiences for children all over the world.

We want to inspire and develop the builders of tomorrow. In order to meet TLG's long-term goal of reaching 300 million children by 2032, we need to ensure our marketing efforts are sustainable. We will never sacrifice our values for short-term gains.

Marketing communications are an essential tool in engaging and interacting with consumers. It is important for us to have a dialogue with parents and children about our products and to illustrate the types and extent of play experiences they can expect from LEGO products. However, when communicating with children, we have to be sensitive to the fact that children may perceive messages differently from adults. Therefore, we want a responsible marketing approach across all platforms and channels – our own and our partners. Children are the LEGO Group's vital concern; thus we recognize the need for specific safeguards to prevent misleading, exploitative, or aggressive marketing practices towards children.

This policy is a living document guided by our brand framework and aspiration that only the best is good enough. This Responsible Marketing Policy is to be applied globally in conjunction with local laws, other relevant TLG corporate policies and industry best practices.

We believe in transparency as a key enabler that drives change and best practice sharing. We have used UNICEF's Children's Rights and Business Principles, in particular principle six requiring business to "Use marketing and advertising that respect and support children's rights", to guide our child engagement activities and to execute our commitment to responsible marketing.

We also ensure compliance with other global initiatives such as the International Chamber of Commerce's code, as well as other interest groups which seeks to promote best practices and raise awareness on the subject of responsible marketing.

General rules for responsible marketing to children policy

Scope of the Policy

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

The key focus areas are:

1. Ensuring Honesty and Truthfulness
2. Promoting Safe Play

3. Being Socially Responsible
4. Securing Data Privacy

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

Failure to comply with this Policy can result in a loss for TLG or its strategic partners and can lead to disciplinary sanctions. In addition, TLG will comply with all appropriate procedures and applicable legislation.

Ensuring Honesty and Truthfulness

TLG always takes into account the level of knowledge, sophistication and maturity of the audience to which the message is primarily directed. Children, especially younger ones, may have a limited capacity for evaluating the credibility of the information they receive, as well as its commercial nature.

Unreasonable expectations of product quality or performance must not be conveyed either directly or indirectly. Realizing that children are imaginative, and that make-believe play constitutes an important part of the growing up process TLG takes great care not to exploit the imaginative qualities of children.

Identification of Marketing Communications

- Ensure marketing communications targeted at children are clearly identifiable for children if it is not otherwise clear from the presentation and context.
- Use clear and age-appropriate messaging and visuals when we communicate with our audience, including apps and games.
- When using influencers (bloggers, vloggers) follow the guidelines from Social Media BU within BMD.[link to policy/guide]
- Do not use children as brand ambassadors.
- TLG creates strong stand-alone stories and characters (TV series and webisodes) tied to select LEGO properties. The entertainment content must not be used directly in marketing communications.
- Products derived from or associated with entertainment content primarily directed to children should not be advertised during or adjacent to a program or webisode containing the entertainment content.
- We do not allow marketing in schools.
- We may sponsor school events, where they are of a charitable and/or educational character and not perceived as being an attempt of marketing.

Inexperience and Credulity

- Marketing and terms from TLG must be communicated in a way that is clearly understood by the intended audience.
- Ensure that statements, audio or visuals about the characteristics of the product or services are not likely to mislead a child or create unreasonable expectations of product performance;
- Make sure that reality and fantasy are clearly distinguishable in marketing communications;
- Tip-a-friend/refer-a-friend functions on websites, mobile applications and other channels owned and operated by TLG can be used towards children under the age of 16 years according to marketing guidelines[link to guidelines]

Promoting Safe Play

TLG prioritises safe play, whilst also appreciating the importance of imitation, exploration and experimentation for children. To ensure children's safety, we must take care that we do not encourage children to engage in hazardous activities via our marketing. All marketing must signal high quality play experiences.

Avoidance of Harm

- Marketing must not appear to condone or incite violent or unlawful behaviour.
- TLG will only market through channels that it views as appropriate for the intended audience in terms of age, appropriateness of the content, and consistency with TLG values and TLG business plans.
- We do not link to websites/apps that contain harmful or illegal content and/or are not suited for children.
- We only engage with children on social media platforms, such as in the LEGO Life mobile app, and other spaces with similar safety levels after seeking preapproval from TLG legal and Child Safety.
- We do not combine LEGO bricks and DUPLO bricks in marketing material as it can lead to the supposition that the assembled product is safe for children.

Being Socially Responsible

Ensure that our marketing to children is socially responsible, respects human dignity and promotes positive social behaviour, attitudes and healthy lifestyles.

General Principles on Social Responsibility

- Marketing should respect human dignity and diversity. It should not incite or condone any form of discrimination, including that based upon ethnicity, national origin, religion, age, disability or sexual orientation
- Marketing must represent gender equality and avoid stereotypical representation
- Marketing should not contain any sexually offensive material and should avoid any materials or verbal statements of a sexual nature.
- Humour may be used in advertising and marketing communications but only insofar as it does not stigmatize, humiliate or undermine any person or group of persons.
- Marketing should not suggest that possession or use of a product will give a child advantages over other children, or that not possessing the product will have the opposite effect.

Respect parents and caregivers' authority

- Ensure that marketing communications do not undermine the authority, responsibility, judgment of parents and caregivers;
- If children appear in or are involved in marketing communications, make sure to have all necessary consent requirements in place.
- Make sure that marketing communications do not include any direct exhortation to children to persuade adults to buy products for them, also known as pestering.

Securing Data privacy

TLG respects the privacy rights of all of our consumers and embeds this respect for privacy into all stages of the marketing lifecycle, with a special focus on children. Principles such as transparency, security, data minimization, privacy by design and privacy by default are essential for TLG when handling privacy data.

- All privacy data handled by TLG will be done through LEGO System A/S as the data controller and with other TLG entities as data processors.
- All handling of privacy data has to comply with the TLG Binding Corporate Rules (BCR) Privacy Policy encompassing, among others, the Children Online Privacy Protection Act (COPPA).
- All websites, mobile applications and other digital services owned and operated by TLG will prominently display the TLG Privacy Policy and relevant privacy certification, if any.
- We do not use personal profiling/behavioural advertising on children for the purpose of direct marketing without having obtained prior verifiable parental consent (VPC) from parent or legal guardian.
- Contextual advertising on websites, mobile applications and other channels owned and operated by TLG are only allowed on the basis of a user's anonymous behaviour and do not lead to the identification of the user.
- Only use VPC mechanisms approved by TLG legal and Child Safety teams.
- The TLG Privacy Policy is readily available to consumers at LEGO.com - [\[link to policy\]](#)

Governance

Ownership

The Responsible Marketing to Children Policy is owned by the Corporate Compliance Board ("CCB"). The day-to-day management of this policy shall be the responsibility of the Responsible Marketing to Children Group.

The Responsible Marketing to Children Group will consist of relevant stakeholders appointed by the head of BMD who will also head up the Group.

Education & Awareness/business enabling

The Responsible Marketing to Children Group provides training in the TLG Responsible Marketing to Children Policy to empower LEGO employees and third parties to fully understand and apply the policy.

The training is mandatory for employees in commercial communications.

The following relevant policies can be found on the TLG Policy Portal [\[link\]](#)

- Child Protection Policy,
- Privacy Policy,
- Digital Child Safety Policy,
- Brand Manual Policy, and
- The Traffic Light Policy.

The following guidelines can be found on the TLG corporate intranet site:

- TLG Digital Child Safety guidelines, [\[link\]](#)
- Legal marketing guidelines, [\[link\]](#)
- Data privacy guidelines, [\[link\]](#) and
- Influencer Playbook guidelines, [\[link\]](#)

Other policies and guidelines might apply.

PRIVATE AND CONFIDENTIAL

Accountability

The Responsible Marketing to Children Group shall periodically report its activities and dealings related to the administration of and compliance with the Responsible Marketing to Children Policy to the CCB.

TLG will be audited on a regular basis by internal and external auditors on marketing compliance. The findings of these audits are included in the development of our training tools for marketers and the annual Corporate Responsibility report.

Who to contact

Questions on this policy should be forwarded to the responsible legal business partner for the specific CM area – [link]