



Child safeguarding policy

Objective

The LEGO Foundation is committed to ensuring the safety, dignity, and well-being of all children. We uphold a zero-tolerance approach to any form of child abuse, exploitation, neglect, or violence—offline or online. This policy outlines the standards and expectations that guide safeguarding practices in all interactions involving LEGO Foundation employees, partners, and representatives.

Definition

Child safeguarding refers to preventing, responding to, and addressing abuse, neglect, exploitation, or violence against children. A child is defined as any individual under the age of 18.

Scope

This policy applies to all LEGO Foundation employees—whether full-time, part-time, paid, unpaid, interns, volunteers or trustees—as well as partners, contractors, consultants, agencies, and any individuals acting on behalf of the LEGO Foundation. It also applies to all children who are directly or indirectly engaged through our programmes, partners, or digital platforms. The policy holds across all countries and contexts in which the LEGO Foundation operates.

Key Areas of Safeguarding

Safeguarding efforts aim to prevent and respond to physical abuse, emotional abuse, neglect, sexual abuse, exploitation,

and risks that occur both offline and online. This requires establishing appropriate policies, procedures, and practices to ensure protection and accountability.

Responsibilities

The LEGO Foundation leadership team is responsible for promoting and upholding the Child Safeguarding Policy and ensuring that employees are informed and compliant. All employees must safeguard children in all interactions, report concerns immediately and participate in required training.

Organisational responsibilities, including for LEGO Foundation partners, include screening relevant employees, providing ongoing training, embedding contractual safeguarding requirements and ensuring effective systems for reporting and addressing incidents.

Digital safeguarding includes conducting regular risk assessments of digital platforms, ensuring age verification and parental consent where required, handling children's data securely, monitoring digital environments to prevent exposure to harmful content, maintaining clear digital reporting procedures, and training employees on digital risks, including AI-related threats.



Prohibited Behavior

At the LEGO Foundation we do not accept the following behaviour

- ▶ Physically harming or threatening a child
- ▶ Engaging in sexual activity or relationships with anyone under 18
- ▶ Developing exploitative or abusive relationships
- ▶ Using inappropriate, offensive, or abusive language
- ▶ Behaving in sexually provocative ways
- ▶ Performing personal tasks children can do on their own
- ▶ Condoning illegal, unsafe, or abusive behaviour
- ▶ Shaming, humiliating, or emotionally abusing children
- ▶ Neglecting a child, e.g. through inadequate care or supervision, or leaving a child in a dangerous situation
- ▶ Showing favouritism or discrimination
- ▶ Spending excessive unsupervised time alone with a child
- ▶ Exposing children to inappropriate or harmful digital content
- ▶ Engaging in private, unsupervised digital communication with children
- ▶ Sharing or creating inappropriate digital content involving children
- ▶ Using AI or digital tools to create harmful, misleading, or abusive content involving children
- ▶ Commercial or other exploitation – e.g. conducting marketing that misleads children.

This is not an exhaustive or exclusive list. Employees, 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.

Required Behavior

At the LEGO Foundation we expect the following behavior

- ▶ Treat children with dignity and respect
- ▶ Be friendly, supportive, and approachable
- ▶ Respect cultural norms and local expectations
- ▶ Listen attentively and take children's concerns seriously
- ▶ Ensure that activities are safe, positive, and inclusive
- ▶ Remain visible and easily identifiable during events

Reporting Concern

Any concerns or suspicions must be reported immediately to the relevant manager or to

head.grants.legal@legofoundation.com

and, where appropriate, to national authorities.