



Progress Report 2011

The LEGO Group





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The LEGO Group

Welcome to Progress Report 2011

This Progress Report 2011 and the Annual Report 2011 constitute the reporting commitments of the LEGO Group in 2011.

The purpose of the Progress Report 2011 is to provide our stakeholders with a fair and balanced picture of our sustainability efforts in 2011. The report provides an overview of our activities, practices, goals and results.

The Progress Report 2011 also serves as our annual communication on progress in sustainability, as required by the United Nations Global Compact. The report is the statutory statement on Corporate Social Responsibility according to section 99a of the Danish Financial Statements Act.

The report is developed in accordance with the main reporting principles of the Sustainability Reporting Guidelines from the Global Reporting Initiative (GRI). And we are inspired by the voluntary standard AA1000 Accountability Principles drawn up by the Institute of Social and Ethical Accountability (AccountAbility).

The basis of the report, the scope, and the materiality determination are all based on a dialogue with main stakeholders about issues that are material to them.

For the 2011 report, we have applied the same model as we have used during the last three years for selecting sustainability content.



Read more about this at
<http://aboutus.lego.com/sustainability>



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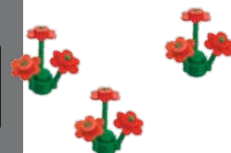
Read more about our sustainability work here:
<http://aboutus.lego.com/sustainability>

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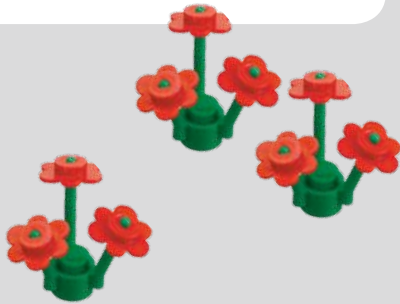
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Product recalls

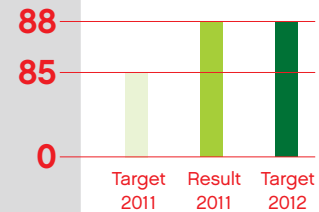
0

In 2011, the LEGO Group once again reached its target of 0 product recalls. We calculate product recalls as launched products recalled from the market due to product safety issues. Product recalls are calculated per stock keeping unit.



Recycled waste

as percentage of total registered waste



Our recycled waste percentage shows the recycled quantities of waste compared to total quantities of waste.

Injury rate

2.0

Target 2011

2.1

Result 2011

1.8

Target 2012

We calculate the injury rate as the number of occupational injuries per million hours that result in at least one day's absence following the day of the injury.



2011 highlights

Building on the success of previous years, we set ourselves a series of ambitious targets for 2011. We have made progress, but there are also targets we did not meet.

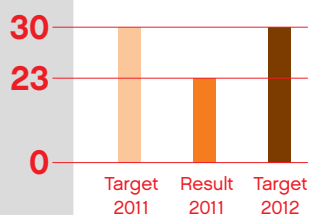
Because the safety of children is our primary concern, we have a goal of zero product recalls. All parts of the LEGO Group are focused on this goal, and we are proud to have reached it again in 2011.

We have an ambitious vision of reducing the amount of waste we produce and increasing the amount of

waste we recycle. In 2011, we recycled 88% of the total waste, compared to our target of 85%.

A high degree of energy efficiency is important for us as it makes good sense for the climate, the environment and the bottom line. We have made great strides in previous years and despite improving energy efficiency by a further 2.4%, we did not meet our ambitious target of 5% in 2011. Maintaining improvements at the same rate has been difficult and is expected to remain so. As a consequence, we have reduced our target for 2012 to 2.5%.

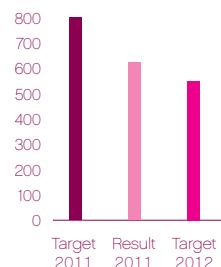
Female directors+ promotions



We did not reach our target of ensuring that at least 30% of promotions to top management levels went to females.

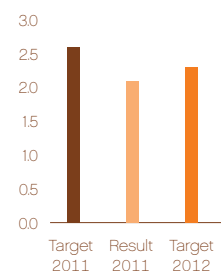


Consumer complaint call rate



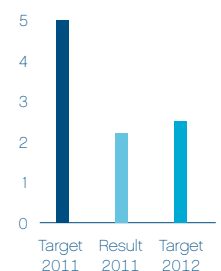
The consumer complaint call rate is the number of consumer complaints received relating to products launched in 2011 as a parts per million (ppm) of the number of products sold in the launch year.

Sick leave



Sick leave is the number of hours lost due to the employees' own illness calculated as a percentage of the total hours worked.

Energy efficiency improvement



We set a high target for 2011. We calculate the energy efficiency improvement as the rate between energy consumption and raw materials used.

We have been working for years towards our 2015 target to be among the top ten companies for employee health and safety. In 2011 we achieved an all-time low injury rate of 2.1, but just missed our ambitious target of 2.0.

Moreover, we have seen a considerable fall in the number of hours that employees are absent because of illness, well within our target.

Motivation and commitment among LEGO employees was again at a very high level in 2011, which is a key

factor in reaching our goals. We are working to ensure diversity in many dimensions, but failed to meet our target for the percentage of females promoted to director levels and above.



Read more at
<http://aboutus.LEGO.com/sustainability>

Sustainability - the LEGO way

It is deeply embedded in the values of the LEGO Group to leave a positive impact on our surroundings. We are in the business of play and our vision is to invent the future of play. Children are our role models. They reinvent the world and themselves in it over and over again, surprising themselves and others by what they can create and do. We want to leave them a future that will enable them to achieve their full human potential.

Since our foundation, we have been working consciously and deliberately with sustainability, signing the UN Global Compact in 2003 and striving to address its ten principles. In 2006 we issued our first sustainability report and have since tracked our progress every year.

Our efforts in the area of sustainability follow on from the way we run our business – 'The LEGO way', where only the best is good enough. In 2009 we made four main promises to our stakeholders. These set the direction for everything we do, also when it comes to our sustainability efforts.

By delivering on our promises we are well on our way to achieving our vision of 'Inventing the future of play'.

When we defined the sustainability agenda in late 2009, we found it important to also define a few, focussed overall targets primarily with the purpose of setting the direction for the organisation.

Our overall targets

0 product recalls

Top 10 on employee health and safety

Support learning for **101** million children

Minimum **100%** renewable energy

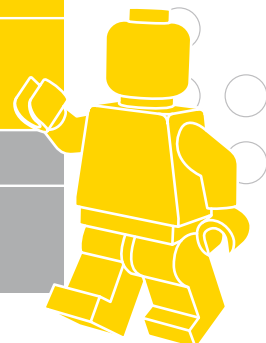
0 waste



You can read more about our targets at <http://aboutus.LEGO.com/sustainability>

The four promises are defined as part of our LEGO® Brand Framework:

Mission	Inspire and develop the builders of tomorrow	
Vision	Inventing the future of play	
Promises	Play Promise Joy of building. Pride of creation	Partner Promise Mutual value creation
	Planet Promise Positive impact	People Promise Succeed together
Spirit	Only the best is good enough	
Values	Imagination - Creativity - Fun Learning - Caring - Quality	





Message From the CEO

The LEGO Group achieved a record-breaking profit for 2011. It is essential for us to create good financial results in order to secure the health of the company. We can

only do so by continuously working to develop our sustainability efforts, while striving towards our Planet Promise of leaving a positive impact.

Since we were established, it has been of the utmost importance for our owners to create value for all stakeholders: first and foremost for our core target group, consumers who experience the unique, fun and developing play experience when engaging with our products; employees who can put their skills and creativity into play in the workplace; customers and other partners with whom we jointly create mutual value; and the environment surrounding us whether it is by reducing greenhouse gas emissions or working to find better solutions to how we design, produce and distribute our products.

We believe that the most important positive impact we as a company have is through our products. LEGO® products offer children something special on top of being a great play material. They offer systematic creativity. The steady evolutionary process of continuously supporting and developing children's creativity is at the core of our innovation process, which we endeavour to continuously improve. We regard our core products as sustainable, based on their long durability, and a compatibility that goes back more than 50 years.

The sustainability ambitions we have set out to reach therefore also centre on our core products and their impact from purchase of raw materials, to design and production, to distribution and to the play experience they bring to children of all ages.

For most sustainability areas we have made good progress during the past year, for example in waste and employee satisfaction. However, we have set high ambitions, and not all targets have been reached. This is the case within gender diversity and injury rates. Thus, there is no time for complacency.

As with everything we do, our sustainability ambitions are based on our company spirit: 'Only the best is good enough'. Therefore, we will continue to set high ambitions in order to increase our positive impact.

In 2011 we started a journey of creating an even more adaptable LEGO Group, which will also makes us a more sustainable business. This change continues into 2012 and will have great implications for most of our employees as well as many stakeholders. We did this in order to work more effectively when addressing the five adaptive challenges facing us. These are: globalisation with a particular focus on Asia, digitalisation, marketing integration and core innovation. Our Planet Promise will remain in focus as we tackle these challenges.

With this Progress Report, we hold ourselves accountable to our stakeholders and report on how we have delivered on the promises we have made. Business acumen and prudence are prerequisites for long-term respect, recognition, and success in society. We have a well-designed and well-executed corporate governance in place which should help to ensure that, in addition to advancing on our own sustainability targets, we also live up to our commitment to the 10 principles of the UN Global Compact. We signed the Compact in 2003 as the first company in the industry and continue to support this initiative.

In 2012, we celebrate the 80th anniversary of the LEGO Group. In the years to come, we will keep pursuing our vision of inventing the future of play and do so in a balanced way that supports long-term sustainability. Succeeding in that will be the foundation for our success in the coming 80 years.

Jørgen Vig Knudstorp
President and CEO

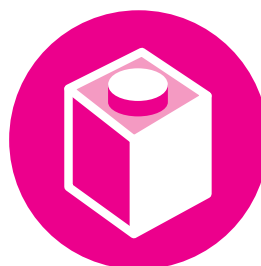
Our sustainability issues

In 2011 we have changed our reporting structure from reporting through our value chain in 2010, to this year reporting on eight sustainability issues relevant to our business. We believe this structure improves the transparency of our sustainability efforts. The way we go about our daily business and our strategic decisions impact all these issues. The eight sustainability issues will help you navigate through this report.

Environment, pages 18-21. In the LEGO Group we want to leave a positive impact on the environment. Focus is on resources, as this has vital importance for future environmental demands.

Sustainable play, pages 12-17. We have strong opinions about Play. We believe that the LEGO Group should produce and market high quality products that last for generations and are safe online and offline. It is about continuing to develop a systematic approach to creativity and play to enhance learning and to help pass on the joy of play from generation to generation.

Stakeholder dialogue, pages 32-35. We engage with our stakeholders with respect, listening and engaging in an open and honest dialogue on issues that matter to our stakeholders in order to meet or exceed their expectations. We have a responsibility that goes beyond the value chain of our products.



Sustainable play



Environment



Stakeholder dialogue



Human rights

Human rights, pages 36-38. We actively take part in the promotion of internationally agreed human rights. We fully acknowledge that we have a responsibility to ensure respect for human rights in our operations. Human rights align well with many of our core values and we made a formal commitment to human rights by signing the UN Global Compact in 2003.

Climate, pages 22-25. Our most important stakeholders are children. They have a right to a healthy and rich environment both now and in the future. We acknowledge our contribution to man-made climate change, and are concerned about the consequences. We are therefore focused on saving energy at production sites and offices, and are working towards securing using renewable energy sources to, as a minimum, balance our electricity consumption at the latest in 2020 to leave a positive impact.



Climate



Employees

Employees, pages 26-31. We strive to improve the well-being, job satisfaction and development of our employees, while recruiting, welcoming and integrating new employees to our organisation. We recognise the rapid growth of our business has only been made possible by the skill, dedication and commitment of our people.



Governance

Governance, pages 39-40. We maintain professional management of our company, including a strong and competent board of directors in line with leading management practices, also with regard to good corporate governance.



The LEGO Foundation

The LEGO Foundation, pages 41-44. In the LEGO Foundation we work to inspire and develop the builders of tomorrow. We do so by working with three different funding programs: Care for Children in Need, Care for Education, and Care for LEGO Local Communities. The LEGO Foundation holds 25% of the LEGO Group shares.

Sustainable play

Throughout 2011 we worked on developing new corporate standards such as the new position on marketing to children. This chapter is about how we maintain consumer confidence in our products and how we work with systematic creativity and learning for children.

Selected sustainable play data

Product recalls

Target 2011

We calculate product recalls as launched products recalled from the market due to product safety issues. Calculated per stock keeping unit.

0

Result 2011

The LEGO Group has in 2011 stayed within our target of 0 product recalls.

0

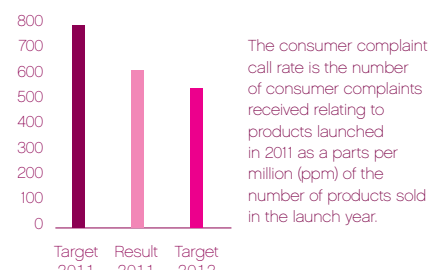
Target 2012

The LEGO Group continues to have a focus on 0 product recalls in 2012.

0

Other selected relevant data

Consumer complaint call rate



Net Promoter Score Index®

120 index

The index shows how likely consumers are to recommend a LEGO product or service to others.

For full data on sustainable play read data overview, page 45.

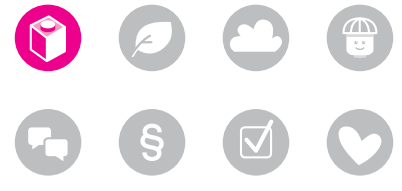
We have strong opinions about play. Our origin and authenticity is expressed in the name: LEGO (a shortened form of the Danish words *Leg* and *godt*, or play well). We believe the LEGO Group should produce and market high-quality products that last for generations and are safe both online and offline. We continue to develop a systematic approach to creativity and play to enhance learning and to help pass on the joy of play from generation to generation. We call this Sustainable Play.

All LEGO® bricks are compatible across time and product line, giving each brick a very long lifetime.

LEGO bricks never become redundant, as each one can be reused to build new ideas and to unfold children's creativity. Bricks that are not passed on to family or friends are often sold second-hand. We call this Sustainable Play. The resilience and long-life of LEGO products supports our Play Promise by extending play value over time. It also opposes a culture of 'play and throw away', helping to support our Planet Promise.

Learning through systematic creativity

Our mission is to 'Inspire and develop the Builders of Tomorrow' by stimulating children's systematic



creativity. The LEGO Learning Institute is part of the LEGO Group and supports this mission by conducting research on how children can express creativity through systems of play and learning. The ambition is to bring knowledge and insight to new audiences, while at the same time generating helpful feedback to the people who design and build our play experiences. Over the years a profound understanding of how children learn and play has been accumulated.

In 2011 the LEGO Learning Institute researched the Future of Learning with leading experts in play, learning and children's cognitive development. This foundational study emphasises the importance of creative leadership in learning. In the course of the year, the Institute held several working seminars with both LEGO employees and external academic partners on the Future of Learning and its previous report, The Future of Play. The results of the Future of Learning project will be publicly available in 2012, and the LEGO Group is seeking to stimulate many initiatives around creative learning in 2012.



Since its beginning more than 30 years ago, LEGO Education has been responding to demands from pre-schools, schools and after-school facilities to address important areas of the curriculum. In 2011 LEGO Education continued to extend its global reach with several major projects, including introducing LEGO Education WeDo™ to science and technology teaching in 20,000 primary schools across Peru.

CASE

Children's private speech and play

In 2011, the Billund-based LEGO Learning Institute intensified its academic collaboration with the University of Cambridge and Dr David Whitebread. In a project on Private Speech and Play, supported by the LEGO Foundation, a new study has initiated a series of experiments to evaluate how open-ended play stimulates children's 'private speech'.

This research describes the relationship between what children are doing with their hands through play, and what they are thinking about when playing. This indication of 'children speaking out loud' when playing by themselves, signifies a the start of a process of self-regulation, which is important for cognitive development, school readiness and the general ability of children to manage their emotions and social behaviour, explains Bo Stjerne Thomsen, Senior Research Manager LEGO Learning Institute.



Bo Stjerne Thomsen, Senior Research Manager, LEGO Learning Institute

FOCUS

Build The Change: Building our Green City of the Future

More than 800 school children came together in Melbourne in Australia in November 2011 to build the green city of tomorrow out of LEGO® bricks. The children focused on green parks, alternative power stations, pleasant places to sit and enjoy life, and finally green and sustainable houses.

The children were building their ideas at the Build The Change event, 'Green City of the Future'. The event coincided with the official Danish Business delegation's visit to Australia named 'State of Green, Join the Future. Think Denmark' headed by Their Royal Highnesses, the Danish Crown Prince Frederik and Crown Princess Mary. The Royal couple came to see the work that the children had done and showed great interest in the ideas behind the creations.

LEGO Education, the Danish Art Agency and ARTPLAY had arranged the Build The Change event in Melbourne in partnership. The event was designed to give the general public a chance to build their ideas and dreams for a greener city in the future. As many as 2,400 people participated.

– These children are the next generation to take over and it is important to stimulate their ability to think out of the box in order to find innovative and creative solutions to the challenges they will meet in the future. From listening to the present voice of children we can improve the future. Now we just need to ensure that their voices are heard, says Camilla Torpe, event manager and creator of the event.

The Build The Change programme was launched

in 2009 and introduced building with bricks as a tool to communicate and express ideas. Participants – mainly children – build the changes they want to see in their own communities.

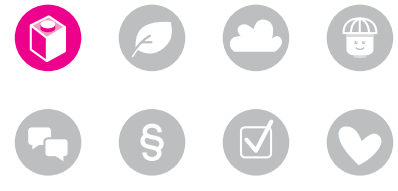
Build The Change events are organised between the LEGO Group and selected partners and focus on many different topics. Through the programme the LEGO Group hopes to foster systematic creativity and imagination among children. Besides creating awareness about LEGO Education and its learning products,



HRH Princess Mary took an interest in LEGO® MINDSTORMS®.
Photo: Robert Cianflone/AP/Polfoto.

the event in Melbourne also provided the children with the opportunity to reflect on how to build a green future.

In 2012 the plan is to establish a joint venture with the city of Manchester in the United Kingdom to initiate a Build The Change event that will serve as a source of inspiration for an urban renewal plan in Manchester. Children and their families will be invited to build their ideas for a better city.



Quality systems in place

The LEGO Group imposes high standards on design, development and production of LEGO products. All LEGO play materials comply with the European and the US toy regulations. All play materials must as a minimum comply with all toy standards, national as well as international. Our ISO 9001 certified quality management system forms the basis for quality control and continuous monitoring. The system ensures quality through random sampling, including counting elements, building models and assessing moulding quality. We want to ensure that external partners comply with our guidelines not only with regard to quality and safety but also with regard to our strong opinions about children and play.

Meeting our consumers' needs and exceeding their expectations

Our ambition is to create life-long play experiences. This is why it is crucial that our products are durable, while providing interesting and fun play. We have a strong focus on the needs of our consumers in developing our products and it is important for us to exceed our consumers' expectations of our products and the LEGO brand. We maintain an open dialogue with our consumers in order to get a sense of their needs and expectations.

We want to constantly improve our products and we have a history of collaborating with consumers to create new products. In 2011 we launched our 'Closing the Loop' programme as a way to get more feedback from consumers. Adults buying our products in stores can volunteer to be contacted shortly after their purchase by a LEGO employee, who will ask them about their experience. Our main objective is to gather information that can help us shape our products to meet the consumers' expectations.

Consumer complaints

We also measure consumer satisfaction through the Consumer Complaints Call Rate. Since 2005 we have collected, analysed and systematically categorised consumer complaints to detect a pattern and designate main areas for development. Thanks to a substantial amount of data, we are now better able to track which product lines score high and low in the Net Promoter Score (read more page 43), and make



targeted adjustments and improvements. The Consumer Complaint Call Rate has been reduced over the past three years. The target for the Consumer Complaint Call Rate in 2011 was below or equal to 800 ppm and the result was 623 ppm. Our target for 2012 is to be below or equal to 550.

We continue to react on consumer feedback to improve the play experience.

Product safety

Product safety is a top priority and is relevant both for our physical products and our online and digital products. It is crucial that our consumers trust in the quality of all LEGO products and that they are safe for children. Product safety is an important element of product development, quality management and partnerships. However, we aim to do much more than just meet regulations – we want to meet and exceed all consumer expectations of the quality and safety of our products, with regard to design, play patterns and usability. As a global company we need to comply with a variety of local and regional product safety legislation. Some of this is achieved by following internationally acknowledged safety standards and supporting the further development of such standards.

The LEGO Group is a member of the Toy Industries of Europe (TIE) and the US Toy Industry Association (TIA), and chairs the European committee for standardization of toy safety. As a member of CEN and ISO, we are engaged in promoting safety in the toy sector by helping to define safety standards for toys.

In 2013, an updated version of the European Toy Safety Directive will come into effect. The new regula-



Build The Change was launched in 2009 and introduced building with bricks as a tool to allow children to communicate and express ideas about the changes they want to see in their own communities.

tions have more stringent demands for materials. We have spent 2011 screening our material portfolio and verifying compliance of each raw material to meet these demands by 2013.

Product recalls are a strong indicator of quality and safety and we have only had two product recalls over the past eight years. In 2011 we met our target of zero product recalls, and this will be our target for 2012 as well.

In 2011, we formalised the LEGO Partnership Traffic Light into a corporate standard in order to signal internally that the LEGO Partnership Traffic Light is global and must be adhered to by all LEGO employees. For many years, the LEGO Partnership Traffic Light has been used to ensure that the LEGO Group manages its business outside its core categories in a controlled and structured way.

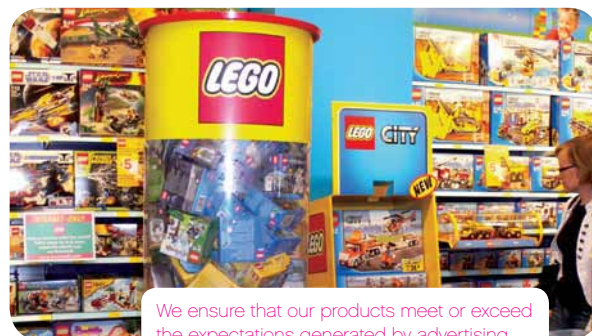
The categories within the LEGO Partnership Traffic Light cover many different business areas. Internal stakeholders from Global Quality, Corporate Affairs, Corporate Communications, Legal, and Brand Development highlight concerns within their area of responsibility continuously in order to ensure that we get a 360 degree perspective on external partner opportunities.

Marketing to children

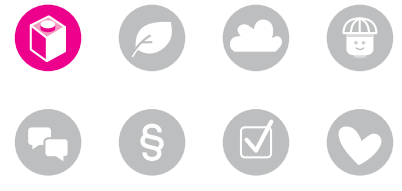
Marketing and advertising allow us to show children the play experiences they can expect from a LEGO product. However, when communicating with children, we are sensitive to the fact that children perceive marketing messages differently from adults. We want

to make sure that when an advertised product is purchased, it will meet or exceed the expectations generated by advertising. By doing so we also believe that we can prevent disappointments and uphold the loyalty of LEGO builders.

The LEGO Group is a member of the Responsible Advertising and Children Programme, and we are committed to acting in accordance with legislation as well as self-regulation, such as the International Chamber of Commerce's (ICC) code of advertising and marketing communication practice. Self-regulation within advertising is a key component of ensuring that marketing communications are carried out responsibly. Self-regulation exists in the US with the Children's Advertising Review Unit (CARU), in most European countries and many jurisdictions around the world, and sets up regulation that goes over and above legal requirements. Since 2002 we have supported the organisation Media Smart, which develops



We ensure that our products meet or exceed the expectations generated by advertising.



and donates teaching resources about the interpretation of commercial messages. Media Smart in the UK has also developed material about online marketing and the need to protect your data. In 2011, a lesson on body image was developed by Media Smart to teach young people about the influence of media and advertising on body image.

In 2011 we introduced a corporate standard and principles for marketing to children in order to strengthen the internal awareness of our values and principles when it comes to marketing to children. We have always worked actively on ensuring that our marketing practices are responsible and live up to our stakeholder's expectations. However, with an increasingly digital and global world we found that it was worthwhile to ensure that our principles are clearly stated. And our new standard is a reminder to all of our employees of the rules we all need to follow in everyday marketing practices.

The guidelines are related to three main issues: inexperience and credulity; avoidance of harm; and social values. Across all channels, our marketing efforts must not exploit the natural credulity and inexperience of children by e.g. failing to disclose information about the need for additional purchases. Additionally, children and youngsters must not be portrayed in unsafe situations or encouraged to engage in hazardous activities. Finally, our marketing efforts must not suggest that our products will give children a physical, psychological or social advantage over other children.

Online safety

We have a focus on online protection when we develop our digital platforms. We support and comply with the Federal Trade Commission's Child Online Privacy Protection Act (COPPA) as well as articles of the 1989 United Nation's Children's Rights Convention, stating that children have the right to participate in play and the right to protection.

Before 2010, our main focus was on securing children's safety in the digital world by constructing and keeping a safe environment on the digital platforms. But children interact more and more in the digital world, which represents an important part of their public sphere. This is why we expanded the focus on digital safety in 2011. Children spend more and more

time playing online. They see it as a natural extension of the physical world and boundaries between the two are blurring. As a commercial company we need to make our products available for children in their digital playroom and be present in the social media, but it is a challenge to combine this with our high standards on child safety. Because we adhere to COPPA rules, we do not engage directly with children under the age of 13 on third-party social media platforms because we have been unable to fully moderate and protect children in this sphere.



Read more about sustainable play at
<http://aboutus.LEGO.com/sustainability>



Weapons and violence

Boys' interest in weapons between the ages of four and nine is considered by academics to be a phase in their development. Learning about how to handle conflicts, aggression and weapons is often part of a LEGO play experience, but only as a means to achieve the goal, whether it is rescuing citizens, finding treasure or saving the universe.

We have strict rules for the use of weapons and violence in our products. The LEGO play experience must never be related to real world modern warfare, killing, torture or cruelty to animals. In 2011 we expanded the LEGO brand guidelines with regard to use, expression and form of violence and weapons. The standard consists of guidelines already known to our employees, but now these guidelines serve as an explicit basis for product development and communication.

Environment

In 2011 our environmental work included increasing our efforts in recycling waste at our factories, reducing the size of our packaging and preparing wood-based packaging and print to use solely FSC materials.

Selected environmental data

Recycled waste

Target 2011

Our recycled waste percentage shows the recycled quantities of waste disposed compared to total quantities of waste disposed.

85%

Result 2011

We managed to recycle more waste in 2011 than targeted for.

88%

Target 2012

We have set our target for 2012 according to our result in 2011.

88%



For full data on the environment read data overview, page 45.

Other selected relevant data

Raw materials

49*

* 1,000 tonnes

We calculate raw materials as plastic granulate used in manufacturing at LEGO sites. Our use of raw materials has increased from 42* in 2010.

Water consumption

225*

* 1,000 m³

We calculate our water consumption as the quantity of water supplied to the LEGO Group.

In the LEGO Group we want to leave a positive impact on the environment. Our focus is on resources as this has vital importance for future environmental demands. We work to ensure that our business is prepared to deliver on these requirements. Our ultimate long-term goal is zero waste.

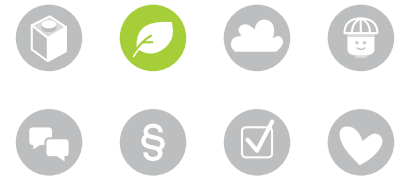
For decades we have been focused on the durability, long life and compatibility of our products, which gives them a unique starting point. However, we still seek to create more environmentally-friendly products and to reduce the waste we generate.

We do have an inevitable impact on the environment: from purchase of raw materials, to design of

products, to the production process, packaging and distribution and finally to end of life. With our Planet Promise in mind, we work at reducing these impacts while focusing our environmental initiatives in order to ensure that we leave a positive impact overall.

Our production

All our production facilities are certified according to the environmental standard, ISO 14001. Each production plant in the LEGO Group adheres to our environmental policies in order to reduce our impact on the environment. In 2012 we are gearing up to ensure that our offices outside production facilities also adhere



to all environmental policies. To make sure that we reach our ambitious targets by 2015, we are planning to initiate two global projects on waste and employee health and safety in 2012. The projects will build up our capacity and capability with regard to waste sorting as well as on continuously safeguarding the health and safety of our employees.

However, we still need to improve to reach our ambition of zero waste. One of the initiatives to meet this target in production is the formation of Green Teams at several local LEGO sites in 2011.

The Green Team members are responsible for encouraging and implementing new ideas on how to reduce waste and energy consumption. The idea is that the teams send clear messages about the environment and encourage small changes in behaviour that will, in turn, evolve into fundamental changes in the mindset of our people. In 2011 the work of the Green Teams has been a great success, especially at the plants in Hungary and Mexico. In both locations Green Teams have involved many employees.

Our global material approval process

Having a comprehensive raw materials list for our products is extremely helpful when we take our products through our global material approval process. We have used this process to test materials for many years, but from 2012 we will also be looking at the environmental toxicology impact as part of this process.

We review all materials and assess them in order to make sure that they fulfil the high demands of being included in LEGO® products. In 2011 we began working on further central procedures to strive for higher standards by measures such as internal off-gas testing used in the Health and Safety assessment, and initiating the use of Life Cycle Assessment as part of the evaluation. This has contributed to an improvement of the global material approval process.

Zero waste

Zero waste means that it should be possible for 100% of waste from the LEGO Group to be recycled and used in other products. We see this as a long-term ambition that may not be achievable in practice, but remains our ultimate goal. We have improved the percentage of recycled waste in 2011 to 88% from 87% in 2010 at our productions sites. In 2011 the total amount of waste was 11,055 tonnes, compared with 9,644 tonnes of waste in 2010. The increase in total waste is not just a result of the growth in production, but also an increase in waste from building activities at all sites.

As the design of a LEGO product and its packaging has high impact on the waste generated downstream in the supply chain, we also strive to work towards our goal of zero waste during the design phase. We have started our journey in two main areas: by optimizing our elements and packaging.



Design for Disassembly of LEGO elements

Design for Disassembly is about designing a product so it can be separated into base elements of materials at its end-of-life. Each element can then be reused as raw material for new products. When it comes to sub-assemblies and the electronic elements of our products, we also see an opportunity to encourage innovation by our suppliers to support cost reductions and environmental optimisation at the same time. In 2011 we began working with Life Cycle Assessments (LCA) to evaluate the effects of an element's design on the environment over its life. LCA can help us make decisions on a more informed basis when we design our products.

Sustainable packaging

We have made great advances to increase the use of recycled materials and our primary packaging (LEGO boxes) already contains on average around 75% recycled materials.

FOCUS

Smaller boxes meet consumer needs and save CO₂ and waste

The Green Box project started as a project to reduce the size of LEGO® boxes to meet demands from retailers and consumers who wanted less packaging material. With it comes the potential to save over 1,000 tonnes of carbon emissions from packaging and over 2,500 tonnes of cardboard waste once it has been fully implemented in 2013.

Throughout 2011, the LEGO Group has been working to develop and test the Green Box project in order to be able to fully implement it globally in 2013. The project focuses on reducing the size of boxes, but as the project developed it became clear that there were obvious environmental benefits too.

Preliminary trials indicate that this project could help save around 1,000 tonnes on carbon emissions from packaging material and over 2,500 tonnes post-consumer waste.

– We can see that by taking box sizes down, we save significantly on volume. This has a positive impact on how much paper we have to buy for packing material, on how many boxes we can stack on pallets and finally, on how many products we can pack in trucks when we distribute, says Carsten Rasmussen, Senior Vice President and General Manager, EU Production.

Calculations of the total carbon emissions regarding the total lifecycle of the packaging materials indicate that the carbon footprint of the packaging materials will be reduced.

As the boxes are smaller, more can be filled into trucks distributing LEGO® products, which in turn means fewer trucks on the roads.

– We have 40,000 product movements every day globally, and with the smaller boxes we can move more with fewer trucks, says Carsten Rasmussen.

In order to improve packaging even more, Carsten Rasmussen and his team are currently testing the plastic bags containing bricks inside the box, known as pre-packs. The tests are looking for ways to reduce

the amount of air in the pre-pack bags, while keeping up the high requirements for product safety.

Less packaging material = less waste

By reducing the amount of packaging material, the amount of post-consumer waste will also be reduced.

– We are extremely happy with these positive effects on our environmental impact. Combined with the fact that we will now also start using FSC-certified material for all wood-based

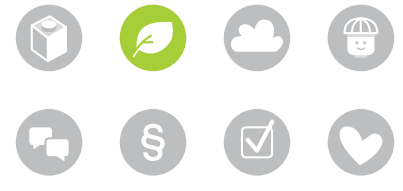
packaging and print, we see this project as a great leap towards creating a positive impact for the future, says Jes Faltum, Director, Sustainability Development, Corporate Affairs.



LEGO employees Carina Lysgaard and Franz Kock from the Green Box project show the difference between old and new LEGO boxes.



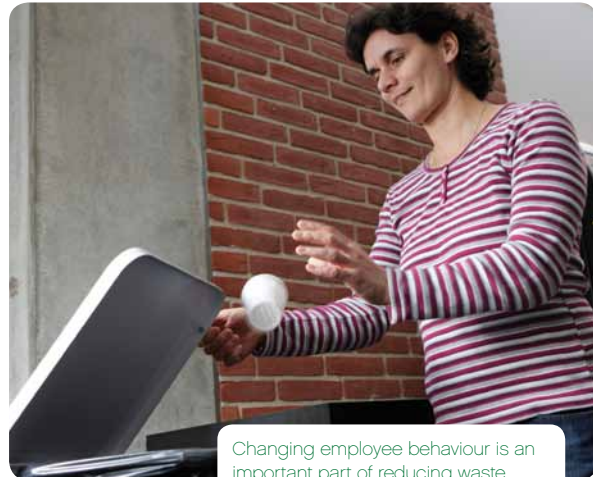
Read more about the environment at
<http://aboutus.LEGO.com/sustainability>



In 2011 we joined FSC Denmark, the Danish office of the Forest Stewardship Council, as part of our plan towards achieving 100% FSC-certified sources for main wood-based packaging and print materials. We chose to join FSC because of the high level of trust it has internationally.

In 2011 the LEGO Group was criticized by Greenpeace for using mixed tropical hardwood from a supplier in Indonesia. According to Greenpeace, mixed tropical hardwoods were found in one LEGO product, a book produced under licence by one of our licensing partners.

We entered into a dialogue with Greenpeace and further developed our three-step plan: first to reduce the impact of our packaging on the world's forests already put forward in our Progress Report 2010; second, to maximize the use of recycled packaging material; and third, to also ensure that all fibre, including any virgin fibre used, comes from FSC sources.



Changing employee behaviour is an important part of reducing waste.



Read more about the environment at <http://aboutus.LEGO.com/sustainability>

POINT OF VIEW

Greenpeace

One of the world's most bio-diverse habitats, the Indonesian tropical rain forest, is being pulped and turned into paper packaging. Driving this destruction is Asian Pulp and Paper (APP). Greenpeace's investigation found tropical APP fibre in packaging from the LEGO Group.

The LEGO Group reacted quickly. It had some clear advantages compared to the other companies. Firstly, it was already thinking in terms of reducing its paper use, to increase share of recycled and to only use certified virgin fibre.

Secondly, because it makes most of its products in its own factories, it could quickly confirm that the use of rainforest fibre had been confined to license products. This direct ownership allowed the company to enact its new paper policy, while other toy companies took months investigating the required change.



Dan Belusa, Greenpeace

Climate

Our climate work in 2011 has concentrated on reducing our total energy consumption, with focus on energy savings through new initiatives, such as engaging employees and dedicated work towards securing renewable energy sources.

Selected climate data

Energy efficiency improvement

Target 2011

We set a high target for 2011. We calculate the energy efficiency improvement as the rate between energy consumption and raw materials used.

+5%

Result 2011

We did not meet our target in 2011.

+2.4%

Target 2012

We have adjusted our target in 2012

2.5%



For full data on the climate, read data overview, page 45.

Other selected relevant data

Total energy consumption at production sites

198 GWh

This is our total energy consumption in the form of electricity and heating supplied to the LEGO Group.

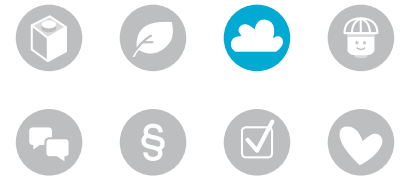
GHG emission

96* tonnes

* 1,000 tonnes CO₂-equivalents.

Our most important stakeholders are children. They have a right to a healthy and rich environment both now and in the future. We acknowledge our contribution to man-made climate change, and are concerned about the consequences. We are therefore focused on saving energy at production sites and offices and are working towards securing renewable energy sources to, as a minimum, balance our electricity consumption at the latest in 2020 to leave a positive impact. We have a target of using 100% renewable energy in 2020.

In a step towards that and creating transparency for our own and other corporations' activities on the climate agenda we joined WindMade™ as a founding partner in 2011 with the ambition of establishing a standard for how companies can demonstrate their renewable energy commitment and performance. We succeeded in this ambition during 2011 and the first WindMade standard is now a reality. The process has brought important progress for the LEGO Group through informative dialogue and knowledge sharing with NGOs and professionals globally. This will help



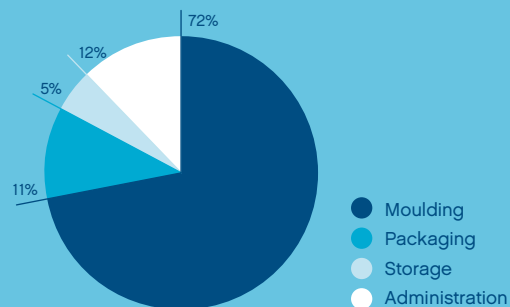
us greatly in our work towards our target to use 100% renewable energy. In 2012 the LEGO Group will play a less active role in WindMade as it has now commercialised and delivered on our ambition. We will still support the initiative as a founding partner.

Energy efficiency and consumption

Between 2007 and 2010 we have made great strides, improving energy efficiency significantly. Maintaining improvements at the same high yearly rate has been difficult and is expected to remain so. Our target for energy efficiency, set in 2007, has been to improve by 5% yearly towards 2015. Despite improving by a further 2.4% in 2011, we have not met our ambitious target of 5%.

The main reason behind this is that we increased our total use of energy by 10% in 2011, keeping pace

Our energy usage by main areas



This figure shows in which parts of our business we used the most energy in 2011.



Better cooling for our employees has adversely impacted our energy efficiency in 2011.



with the growth of our business. The expansion of our Mexico plant in particular has significantly contributed to this increase through the implementation of comfort cooling as part of our People Promise. Moreover, approximately half of our planned energy efficiency projects were stopped, or delayed unexpectedly.

We will make continuous investments in improving energy efficiency, but the gains will be harder to achieve. For 2012 we have adjusted our target to 2.5%, focusing on improvement projects within energy efficiency. The search for new and big innovations to once again significantly increase our energy efficiency will continue in parallel.

Greenhouse Gas Account

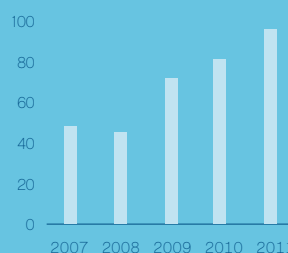
In 2011 we calculated the Greenhouse Gas (GHG) Account for the LEGO Group for the year 2010. The goal of the study was to estimate the GHG account throughout the value chain. It covers the relevant direct and indirect GHG emissions from activities within the organizational boundaries, from the reporting company, and upstream and downstream.

The calculations are based on the guidelines outlined in the GHG Protocol Corporate Accounting and Reporting standard published by WBCSD/WRI. To the extent possible, it includes Scope 1, 2 and 3 emissions and it comprises the accounting and reporting of the greenhouse gases covered by the Kyoto Pro-

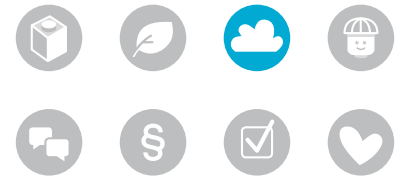
tol. The accuracy of the calculations enables the LEGO Group to identify where in our value chain we need to focus in order to reduce our greenhouse gas emissions.

The GHG account indicates that a large contribution stems from upstream activities related to the raw materials we use, amounting to approximately 60% of the GHG account. Emissions from processing of the raw material, bulk transport, distribution and other core activities amount to approximately 30% of the GHG account. Based on these findings we have iden-

GHG emission (1000 tonnes CO₂-equivalents)



Our CO₂-emissions have grown due to general growth of our business. We have seen a growth in emissions in 2011 because of increased volumes produced at our Mexican plant.



tified the following focus areas in the attempt to reduce the GHG burden account for the LEGO Group.

Improving transport

In 2010 we set up a benchmark model to compare our logistics contractors directly. This system creates a competitive environment where smart-thinking for better transport solutions is easier to evaluate and implement. During 2010 we worked closely with one of our transport providers in Europe to test a new system which reduces the distance travelled by unload-

ed trucks when products are brought to and from our European Distribution Centre in the Czech Republic.

We have also worked to secure transportation capacity and improve the options for environmentally-sound rail transportation. This is why we have used the system of intermodal transport.



Read more about climate at
<http://aboutus.LEGO.com/sustainability>

CASE

Mexico's Green Team reduces energy

At the LEGO factory in Mexico, a new Green Team manned by engaged employees saw the light of day in 2011. The Mexican Green Team's mission is to find ways to reduce energy consumption. During 2011 the team began by installing internal electricity meters. The meters provide the team with a detailed overview of where the factory needs to focus to reduce energy consumption. The collection of data from 2011 will be used for a new plan for energy reduction in 2012.

Mexican employees, unused to the idea of reducing energy, weren't sure at first why they needed to focus on energy consumption and many of them were not completely sure what to do. To engage his colleagues better the leader of the Green Team, Jesus Ramirez, arranged weekly meetings, each with a new topic, as well as training sessions.

– The weekly meetings, information, and training have truly made a positive impact on my colleagues, because they now know exactly what targets we are reaching for and most importantly why! Now we are all committed to reducing energy and we get positive feedback from everyone, explains Jesus Ramirez.



Jesus Ramirez, Leader of the Green-Team, Mexico

Employees

In 2011 we continued our work towards our 2015 target to be among the top ten companies in the world for employee safety. We also worked to improve the well-being, job satisfaction and development of existing employees, focussing on empowerment and collaboration and we worked to integrate new employees.

Selected employee data

Injury rate

Target 2011

We calculate the injury rate as the number of occupational injuries resulting in at least one day's absence following the day of the injury.

2.0

Result 2011

We are at an all-time low for injury rate, but did not reach our target for 2011.

2.1



Target 2012

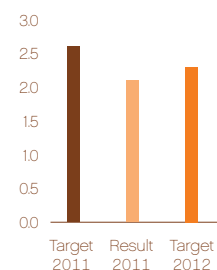
We have set an ambitious 2012 target.

1.8

For full data on employees read data overview, page 45.

Other selected relevant data

Sick leave



Sick leave is the number of hours lost due to the employees' own illness calculated as a percentage of total hours worked.

Motivation and satisfaction

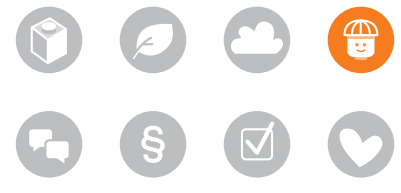
At the end of the reporting year we survey our employees regarding among other things their motivation and satisfaction. The number shows how many index points we are above our international benchmark.

+14

The employees in the LEGO Group are the building blocks of our success. We recognise the rapid growth of our business has only been made possible by the skill, dedication and commitment of our people. In the next few years we expect to welcome around 5,000 new colleagues and it is very important that each and every one of our new colleagues understands and lives our unique LEGO culture. Two main issues are in focus regarding our employees: We want to improve the motivation and skills of our employees. And we continuously improve safety. This is all part of realising our People Promise to succeed together.

Safety at the LEGO Group

At the LEGO Group safety comes first; not only with regard to the products, but also with regard to our employees. We have set a target to be among the top 10 companies in 2015 for employee safety. We are OHSAS 18001 (Occupational Health and Safety Management System) certified at all LEGO sites with more than 100 employees. This certification ensures our commitment to continuous implementation and improvement of the way we manage our health and safety systems. We measure our employees' safety



by looking at several indicators, including the number of injuries with absence and the absence rate due to injuries. While the number of injuries with absence in 2011 fell to 36 from 44, the absence rate due to injuries rose to 0.35 per 1,000 working hours in 2011 from 0.29 in 2010. This failed to meet our target of 0.26 for the year. The increase is a reflection of an increase in the severity of the injuries, requiring our employees to take more time off work.

In 2011 the injury rate fell to 2.1 injuries per million working hours, from 3.0 injuries per million working hours in 2010. However, this was slightly above our 2011 target of 2.0.

We saw a greater number of injuries among our office workers, mainly in Denmark, but also at our brand retail stores. In the first half of 2011 alone there were no fewer than six reports of office accidents in Billund resulting in periods of absence, greater than the whole of 2010. To remedy this, in 2012 we have planned further campaigns to highlight safety awareness in offices, but also in LEGO® Brand Retail stores. Our offices in the UK, the US and Germany have not had one single accident in 2011 resulting in absence.

However, in production we have seen some tremendous improvements as a result of an ongoing campaign to encourage our production workers to take ownership of safety improvements, to regard responsibility as a collective matter and to pay attention to safety in everyday work life. This proactive safety approach has been introduced as the way to change culture, attitude and behaviour.

We have embedded a focus on proactive safety as part of our Performance Management Programme. Production employees are now obliged to report safe-

ty observations each month. And employees in selected areas have to undergo our training programme 'Safety Plus'. The programme combines theory-based knowledge about safety and practical exercises in groups. Focus is on raising awareness about prevention of accidents. We have rolled out the tool called '15 seconds' in selected areas of the organization in order to train employees to reflect upon safety and inappropriate habits for 15 seconds every day.

We believe that our collective actions will lead to a change in behaviour, resulting in reductions in injuries and absence due to injuries in 2012. The target for 2012 is to reach less than 1.8 injuries per million working hours, which is even lower than the 2011 target, and to reach an absence rate due to injury of less than or equal to 0.2 per 1,000 working hours. This target is stricter for us than the target we set for 2011. Though we did not make the target this year, our continuing focus on problem areas makes us believe it is possible to do so in 2012.

EHS non-conformities at main LEGO sites

In 2011, we received 10 major Environment, Health and Safety non-conformities from our external certification company. Six of these were related to environment, and four were related to health and safety. Nine of these were in Billund and one in Kladno. In 2012 we will have a special focus on Billund for improving



FOCUS

Increased Focus on diversity in 2012

A diverse body of employees is a key factor to the success of a global company such as the LEGO Group. From 2012 the focus on diversity at all levels in the company – and with special attention on director level and above – will be enforced.

It is about people from Asia, Europe and the US. It is about women and men. It is about professional backgrounds and different personalities. Such diversity is important for the LEGO Group to match the world in which business is made and to support better decision making. Jørgen Vig Knudstorp, the CEO of the LEGO Group explains:

– In the future we need to address these diversity challenges when hiring and promoting leaders. From now on all leaders have to explain why they cannot find at least one candidate amongst the last three with a 'diversity profile'. By emphasising the importance of following the policy and by speaking out loud about cultural biases we believe that we will be able to recruit an even more diverse body of leaders, says Jørgen Vig Knudstorp.

Re-organising for the future

In 2011 the LEGO Group began a large re-organisation. The re-organisation has focused on becoming more adaptable and more effective. One of the major effects of the re-organisation process has been the expansion of Group management from six to 22 members.

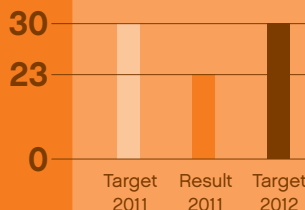
One of the unforeseen consequences of this move has been the fact that the LEGO Group now has a Group management with no women.

– We are highly concerned about diversity in two main areas. We keep a high focus on both cultural and gender diversity, says Jørgen Vig Knudstorp and continues:

– I believe that we are on the right track towards improvement. The fact that no women were appointed to the new management reflects that in the past we have not had a strong enough focus on developing

our female employees' talents. We have this now. We believe that in three years' time we will be able to harvest the benefits of our new internal recruitment focus on women for director level and above.

Female directors+ promotions

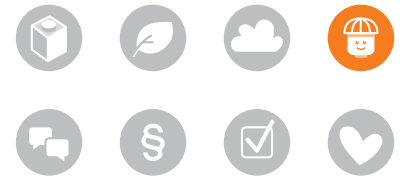


Attracting diversity can be a challenge

One side of the coin is to develop female talent. Another side consists of attracting women as part of a diverse body of talents in general. Troels Wendelbo, Director, HR Insights & Planning, Executive HR explains:

– We need to challenge ourselves when recruiting new directors. We need to attract more diverse candidates externally. We know that diversity is a parameter at all management levels in order to build the necessary pipeline of talents for the organisation.

The average staff turnover in the LEGO Group is low, which means that it takes time to change the diversity ratio. Also the hidden cultural barriers, such as the human propensity to select people reflecting themselves, need to be uncovered in order to instigate change.



these matters. The environmental non-conformities showed that additional resources should be dedicated to address the findings, and an environmental manager was hired to secure future compliance.

Occupational health of the LEGO employees

In 2011 we also looked more in detail at the occupational health of our employees. Occupational health involves both the health and safety of our employees. We take some of the responsibility for the health of our employees upon us at Group level, in order to reduce sick leave and improve the well-being of our employees. We regard this responsibility as a chance to remind our employees about the necessity of a healthy lifestyle and we provide them with concrete opportunities to act. Our employees are encouraged to suggest improvements or express ideas on how to improve our working environment.

In 2011, we encouraged our employees to engage in various locally arranged activities such as becoming a member of the local LEGO cycle team, running during the lunch hour or joining the local LEGO gym to work out. Other local initiatives were healthy food alternatives in the canteens, no sweets in the workplace, quit-smoking courses and weight-loss programmes. Our employees are encouraged to suggest improvements or express ideas on how to improve our working environment.

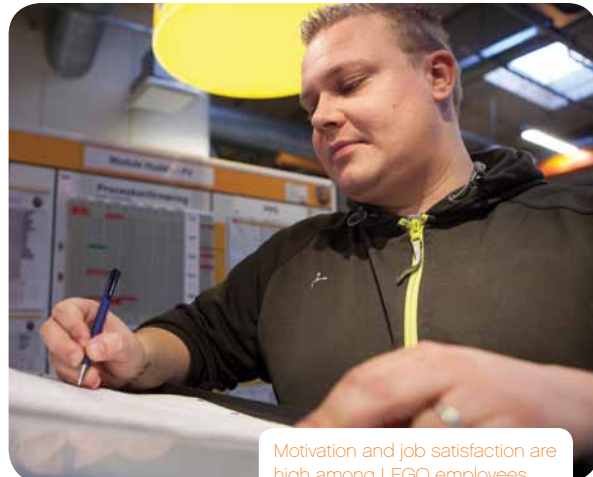
Motivation and satisfaction

Highly motivated and satisfied employees are the building blocks of our success today. In our annual Employee Pulse survey a high level of motivation and satisfaction among our employees is evident. We measure our performance against the general labour markets in a point system, and we have a long-term target of being 10 points ahead of our benchmarks.

We can see from the Pulse that it is the same things that motivate people all over the organisation from Mexico to New Zealand and from production worker to top-level management.

A total of 93% of employees took part in Employee Pulse in 2011, which shows high engagement. As was the case last year, the overall level of motivation and satisfaction rose to +14 in 2011 from +12 last year.

An increase in motivation, satisfaction and engagement is related to our values, culture and reputation,



according to our employees. Across the world, our employees said that having an extraordinary job with exciting tasks and great colleagues, while working for a company with a strong culture and values is highly motivating and satisfying.

During the last three years, we have had a strategic focus within our people and culture agenda to embed and embrace our culture as formulated in our People Promise. We use our employees' own subjective assessment of our company culture from the Pulse results to measure our People Promise. In the third year of this initiative, we have seen this score improve from 51% to 66%, meaning that two thirds of all departments experience our culture even stronger today than in former years. This is below the rather ambitious target set of 80%, but more than satisfactory. Most importantly, we do not find huge motivational discrepancies between either different job levels, business units, nationalities or length of service across the company.

Work-life balance

Our employees also report on how they experience the balance between their life at work and outside work. Our target for 2011 was to achieve an employee score on work-life balance of 0-5 points above the global benchmark. The results show that we have achieved six points above.

Despite this high score, we are well aware of the challenges in keeping a healthy balance. It is impos-



The mould workshop in Billund has been the focus in a proactive safety campaign in 2011.

sible to define a standard work-life balance as each individual has different circumstances at work and at home. One of the potential pitfalls of being a highly-motivated organisation is the risk of employees pushing themselves and each other too hard, driven both by personal enthusiasm and by strong commitment to the many, often exciting and rewarding, tasks at hand. Some employees might be so engulfed in their job at periods that they are at risk of being stressed or burned out. To combat this we focus on a frequent dialogue between employees and managers. We have also focused on expanding virtual workplaces and are constantly exploring alternatives to long distance commutes and business trips abroad by working together in smart and virtual ways.

Cultural and gender diversity

The LEGO Group is an international company and we want our employees to reflect the variety of society in general with regards to culture, backgrounds and way of thinking.

We have a strong focus on diversity in respect of culture and gender in order to strengthen the organisation and our relationships to our stakeholders. In recent years we have focused on how to secure and improve our recruitment of women to positions at leadership level or above. We have measured our progress in two dimensions; namely the overall number of female directors in the LEGO Group and the number

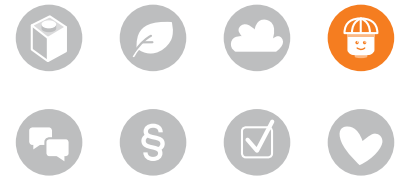
of female new-hires and promotions at director level and above. We have seen general progress with regard to female recruitment in new director positions.

In 2010 we achieved 32% female recruitment for director level and above, which indicates that recruitment in the LEGO Group is moving in the right direction to meet our high ambitions with regard to gender diversity at this level. This result formed the basis for setting the target for 2011 as high as at least 30%. While we succeeded in recruiting a good number of highly competent female directors in 2011, we achieved only 23%. The primary challenge for the LEGO Group is to recruit women to these positions externally. Only 14% of those recruited externally for new positions were female while the percentage was 29% for internally recruited staff. Even though the results show that reaching our target is a challenge, we are not lowering our ambition. The target for 2012 is to attain 30% or more women for positions at director level and above.

Though we do not set targets for our cultural diversity, in 2011, we hired a larger amount of employees with a cultural diverse background at manager levels and above than ever before.

Attracting and integrating new talent globally

The number of employees in the LEGO Group increased by 947 in 2011. The increase is attributable to the large increase in activities in connection with



the considerable sales growth. Our challenge is to attract qualified applicants for vacancies, select the right people for the jobs, and integrate them into the LEGO culture.

Attracting new employees includes marketing the LEGO Group as an attractive workplace – and one of the tools is to provide new, personalised content in the jobs section of www.LEGO.com. On average, 60-70 vacancies are available at any given time. We also now appear on job-related social media such as LinkedIn. Our aim is to position the LEGO Group as one of the world's most progressive employers. The new job site is an important step on the way. It was launched on December 1 2010 and has reached approximately 50,000 unique visits a month – especially from the US, Germany and Denmark. One of the benefits is that applications for jobs in Denmark from other countries are on the increase.

When we hire a new employee, we immediately provide them access to a special website where they can learn more about the LEGO culture and history. And as a new initiative in 2011, the new employees

will from the first working day be teamed up with a 'Brick-Mate' - a colleague who can help them with the big and small issues in figuring out the organisation as a newcomer.

These are some of the initiatives of the "on-boarding" strategy designed to help new recruits get aboard and into their new jobs. Further initiatives include the launch of two other internal websites: one for leaders whose job includes taking on new employees, the other is a site new employees can visit after they start working for the company. The new strategy focuses on three phases in our recruitment of a new employee: attracting candidates, selecting the right people, and finally settling the successful candidates in their new jobs. It is built on the framework of our best practices of how we onboard new employees.



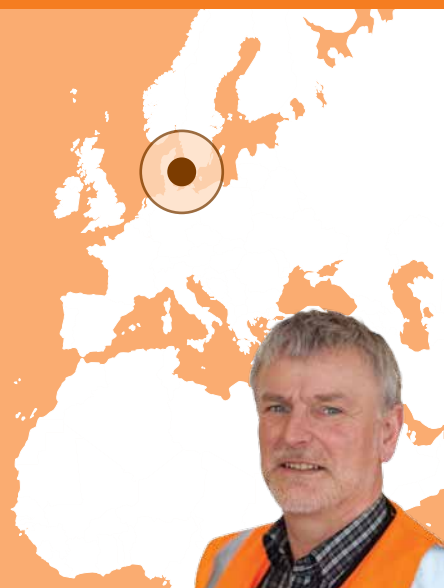
Read more about employees at <http://jobs.LEGO.com>

CASE

Proactive safety as the means to an improved safety culture

Throughout 2011 the LEGO Group has kept a strong focus on safety in the mould workshop in Billund. The aim has been to reduce the injury rate by improving the safety culture. Employees took part in a safety workshop identifying problems and solutions.

– Since the launch, all 91 employees have had to report one safety observation a month. The we select and award the best observation. I am sure that this initiative and our explicit focus on safety has improved our safety culture. Now it's on everyone's mind and it's OK to care and interfere. I think this has contributed to the fact that our injury rate has been significantly reduced, says Arne Jensen, Manager of Mould and Maintenance.



Arne Jensen, Manager of Mould and Maintenance

Stakeholder dialogue

Throughout 2011 we have been working to further improve the regulations on toy safety. We have engaged in continuous dialogue with all of our stakeholders and through a number of surveys, conversations and discussions learned more about them and their expectations of us.

Being in a respectful dialogue with stakeholders and our surrounding community is of foremost importance for the LEGO Group. We are committed to being open and honest, and to reaching high transparency when we communicate with our stakeholders, e.g. NGOs, consumers and fans, suppliers, and public authorities.

The LEGO Group gets great inspiration and input from every stakeholder, whether through online communities, employees, partnerships or other forums. Our products' journey from distribution centres to the hands of a LEGO builder has to pass through several of our stakeholders such as distributors, retailers and buyers. The success of this journey is defined by the way we co-operate closely with our partners and communicate and advertise effectively and responsibly.

Lobbying activities

We work to ensure that our lobbying activities always seek to benefit all stakeholders and are conducted in a transparent and professional manner. We partici-

pate in toy-related lobbying activities in external associations with focus on critical standards, changes in legislation, or other initiatives that may influence the LEGO® brand.

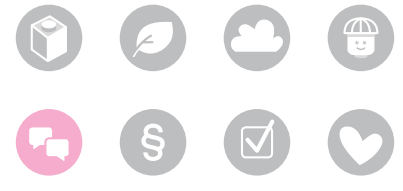
Our primary focus is on regulatory developments within intellectual property rights, toy safety and marketing to children. We are interested in ensuring that the framework conditions for the toy industry are sensible and workable. As an example we support strict rules on toy safety to ensure the highest possible level of safety for children, but new rules must also still be possible to implement. We believe that with our long history of producing safe toys we have key knowledge and competencies to contribute to the process of developing new rules.

We participate in international and regional associations such as the Toy Industries of Europe, TIE, the Toy Industry Association, TIA, the European brand organisation, AIM, and the World Federation of Advertisers, WFA. We also take active part in the development of new toy safety standards in the European Committee

for Standardisation, CEN and the International Organisation for Standardisation, ISO, and the American Standard for Testing and Materials, ASTM.

The focus in 2011 has mainly been on explaining what the LEGO Group is doing in relation to chemicals and product safety and we have primarily communicated with the European Commission, NGOs, and the American authorities. The reason for this is the continued focus on chemicals and product safety, and input from toy companies on the best approach on managing chemicals is requested by a number of stakeholders. We have had a good dialogue with the authorities about the level of documentation that can be considered satisfactory in regards to the product





safety area. We find these discussions very fruitful as they inform us about the expectations from our stakeholders and give us an opportunity to explain our approach and to make informed decisions on how we can improve.

Dialogue with NGOs

We have had a constant dialogue with national and international NGOs throughout the year. We value this dialogue as it helps us to improve employees' rights, working conditions as well as our environmental performance. And it helps increase the understanding of these potentially complicated issues.

Tax and other economic impacts

Tax is a major aspect of business in the community. On the wider agenda, the economic impact of our business on society is based on the direct and indirect employment and associated money flows, including tax paid. It is fundamental to us that our relationships with the local communities in which we operate are based on trust, mutual respect, and a cooperative spirit. We respect the laws and pay the taxes required from us. The corporation tax bill for the LEGO Group in 2011 was DKK 1,381 million.

Engaging with consumers

In 2011 the LEGO Group focused on aligning our direct contact with consumers through the LEGO Club, brand retail stores, our VIP loyalty scheme and LEGO Community Engagement and Events.

We also began a process of getting even closer to our consumers by studying how they perceive and use our products where they meet them – whether online, in stores or through consumer service.

There are millions of articles, videos and photos about LEGO elements and models on the web and on social media networks, but the LEGO Group has only had a sporadic presence featuring individual product lines or initiatives. In 2011 we introduced a corporate approach, employing a social media strategist, implementing guidelines for engaging on social media networks and a social media 'drivers licence' for employees. Being present in social media is part of our overall strategy to increase engagement with our consumers and improve the overall consumer experience. It is also a great possibility for us to gain valu-



able insight into our consumers' interests. Without our employees' active engagement on our different social media platforms we will not succeed. To enable the social media strategy internally we have trained 125 employees as certified social media users.

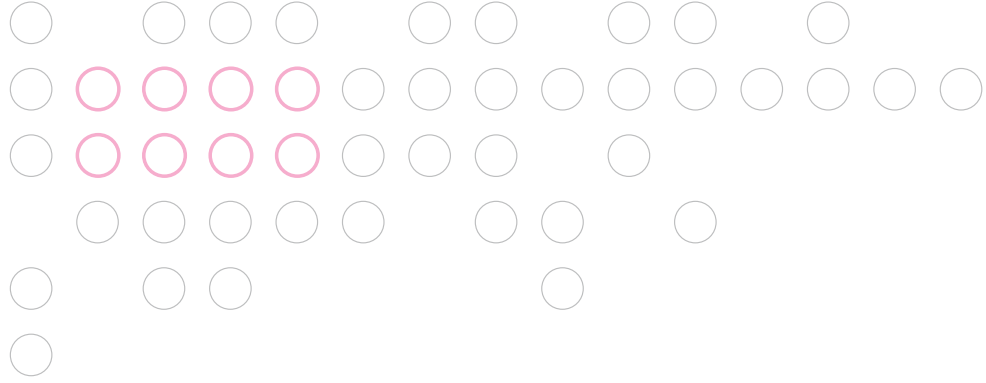
The LEGO Group launched several different social media sites in 2011. One of these is LEGO CUUSOO, which is a website which allows the LEGO Group to source ideas from all around the world by asking people what they think we should be producing. Another site is ReBrick, a social bookmarking service, which was launched as a further step along the road of collaboration with LEGO fans and consumers. The focus

POINT OF VIEW

Walmart

The LEGO Group is the best in the industry at really helping us to manage our business through all metrics including modular productivity goals, sales goals, etc. The main challenge is to work further out with us; often The LEGO Group is too far along in the production process to make changes to products, including exclusives and new item shipments.

Andy Prince, Sr. Category Director
for Boys, Games and Summer Seasonal, Walmart



is on sharing and celebrating what consumers create with LEGO bricks. ReBrick will make it easier to navigate, enjoy and be inspired by the content created by LEGO fans and also help create connections between people in the LEGO community.

Consumer satisfaction

We measure consumer satisfaction through the Net Promoter Program® which is a system of continuously listening to consumer feedback, acknowledging that we heard them, learning from it, taking action, and letting consumers and others within the company know what we did to improve their future experiences. About 500,000 consumers in 2011 told us how likely they were to recommend our products or services to others and why or why not.

We failed to meet the target of index 124 or above in 2011, with the final index ending at 120, at the same level as 2010.

The Net Promoter (NP) Program has proven to be very effective in collecting feedback from consumers, using these insights to drive business decisions and actions, and letting our consumers know that we heard them and took action. Net Promoter Score (NPS) is the key metric used to track consumer satisfaction and loyalty with our products and services. NPS serves as an early warning indicator for the health of a business as it is closely linked to future sales. It is logical: if someone is satisfied with us, they will return, buy again, and tell their friends.

It is even more important that we hear from unhappy consumers and react quickly so we can take action, apologize and make it right. This is how we will earn their loyalty and repeat business. The Net Promoter Program raises employees' awareness and motivates them to consider the impact on consumer satisfaction and long term loyalty when making business decisions.

CASE

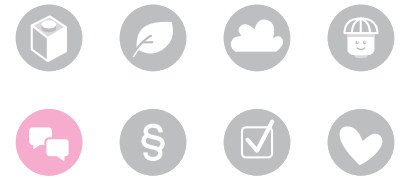
LEGO® bricks make a difference in townships in South Africa

For many years the LEGO Group has had great co-operation in South Africa with Hands on Technologies, both as a business partner and with regard to charity work through The LEGO Foundation. Hands on Technologies is a distributor for LEGO Education products. The problem was that many less privileged children from townships had never seen LEGO® bricks before and did not know how to use them.

- We have been able to constantly improve the learning with LEGO Charity boxes, e.g. by developing instruction material for teachers. The children are now able to build their future. We gave them 101 activities they can do with the LEGO bricks and general training, says Brent Hutchenson, MD Hands on Technologies and adds:
- We see that when the children are playing with LEGO bricks they change their attitude and they have a desire to learn new things.



Brent Hutchenson, MD Hands on Technologies, South Africa



The LEGO Group will continue to raise the bar to create the best possible products and experiences for our consumers.

Knowing our customers better

To make sure we listen and act on retail customer feedback, we have institutionalized an annual health check of our relationship with our main customers; the Customer Pulse Survey. The Pulse provides us with information on expectations for our future business, the effectiveness of our marketing efforts and the quality of our partnerships. It gives us valuable input on how we are performing on our Partner Promise.

In 2011, the Customer Pulse survey showed an increase in overall satisfaction, rising to 126 index points from 123 in 2010, with a base in 2005 figures. This beat the 2011 target of 124 index points. A target for 2012 had not been set as the Progress Report was published. The Customer Pulse figures for Products, Marketing, Service, Partnership and Value were all at the same level as 2010 or higher (see page 45 for details). In 2011 we also conducted a stakeholder survey in three markets: Denmark, the US and Germany, to gain more knowledge about their perceptions and expectations of our sustainability work. We did this in order to ensure that we improve our communication about sustainability to our stakeholders, as more and more of our stakeholders demand specific information from us in this area. The survey taught us, among other things, that we can improve and intensify the level of communication about sustainability issues to our customers. We will be working on developing this area in 2012.

Co-operation in 2011

During 2011, the LEGO Group has collaborated and started partnerships with some of the world's largest companies and organisations working towards common goals of promoting education, science, technology and creativity to children.

The LEGO Group's three-year partnership with NASA reached a milestone last year when the first LEGO models were delivered to the International Space Center orbiting the earth.

The models will be used in eight educational activities conducted by ISS crew members and available to teachers around the world. The first activities were



posted to LEGOSpace.com in 2011, the others will follow during 2012.

A second project in the joint outreach and educational programme was the launch of three LEGO Minifigures as passengers on the deep-space probe, Juno. The specially-constructed aluminium Minifigures of the Roman god Jupiter, his wife Juno and 'father of science' Galileo Galilei will help raise awareness about Juno's mission to improve understanding of our solar system's beginnings by revealing the origin and evolution of Jupiter. Juno and the Minifigures' journey will also be featured on LEGOSpace.com.

The LEGO Group also supported the first Google Online Science Fair to inspire scientific exploration among the next generation of scientists and engineers. The science fair celebrates scientific talent, creates scientific role models and unites students around the world in the quest for learning. The event was the largest online science fair in the world, attracting with more than 7,500 entries from more than 90 countries.

The LEGO Group is also sponsoring this year's fair, which is even more global in scope. Submissions will be accepted in 13 languages and there will be 90 regional finalists – 30 each from the Americas, EMEA and APAC.



Read more about stakeholder dialogue at <http://aboutus.LEGO.com/sustainability>

Human rights

In 2011 we began developing a strategy for human rights. The strategy has included the development of a draft policy on human rights, the start-up of a value chain impact assessment process and a review of our Code of Conduct.

Human rights play an increasingly important role in the global sustainability agenda. In recent years we have experienced a growing expectation from society in general and NGOs that we actively take part in the promotion of internationally agreed human rights.

We fully acknowledge that we have a responsibility to ensure respect for human rights in our operations. Human rights align well with many of our core values and we made a formal commitment to human rights by signing the UN Global Compact in 2003, committing us to ten universally accepted principles in the areas of human rights, labour rights, environment and anti-corruption.

Human rights strategy

The LEGO Group began the process of developing a human rights strategy in 2011. The overall objective of the strategy is to ensure that we have the right measures in place when it comes to ensuring respect for human rights in our operations. The completed strategy will outline the approach that the LEGO Group intends to take on human rights, and draw up those activities that we believe are essential for us in order

to meet our commitments. We expect the strategy to be finalised and adopted in 2012.

While all human rights are equally important, we realise that some stakeholder groups are more affected than others by our activities and at risk of having their rights infringed upon. Similarly, we have a greater opportunity to support the promotion of some human rights than others.

Our strategy will for that reason focus on our employees, our consumers (the children), our suppliers and people in local communities affected by our operations.

Human rights impact assessment process

A key component of the strategy is a human rights impact assessment of our value chain, a process which we began in 2011. The impact assessments will first identify actual and potential areas where we risk negatively affecting human rights. Second, the assessment will identify leadership opportunities where we can have a positive impact by promoting certain human rights.

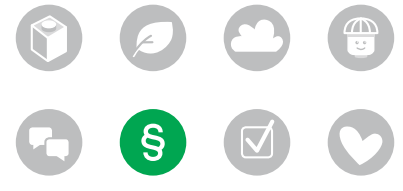
During 2011 we have developed a tool box for conducting human rights impact assessment, including a preliminary human rights risk assessment of our value chain. The next step will be to assess to what extent our policies, guidelines and processes appropriately address the human rights risks we face. We expect to finalize the process in 2012.

The impact assessment process will lead to a list of potential risks and leadership opportunities, which will inform the finalization of the human rights strategy. An example of a potential risk could be when we expand our business and production sites and buy new land. An example of a leadership opportunity could be supporting the promotion of children's right to education.

Our Code of Conduct covers:

- Child labour
- Compensation and working hours
- Discrimination
- Coercion and harassment
- Forced and compulsory labour, including human trafficking
- Health and safety
- Freedom of association
- The environment
- Anti-corruption





Children's rights

Focus on children's rights and businesses' impact on children's rights has gained momentum in 2011. This is reflected in the Business and Children's Rights Principles, an initiative started by the UN Global Compact in Co-operation with UNICEF and Save the Children. The Principles will be launched in March 2012 and encompass those areas where a business potentially impacts children's rights, negatively as well as positively. In 2011 we participated in the consultation process of the Business and Children's Rights Principles and we are following the initiative closely.

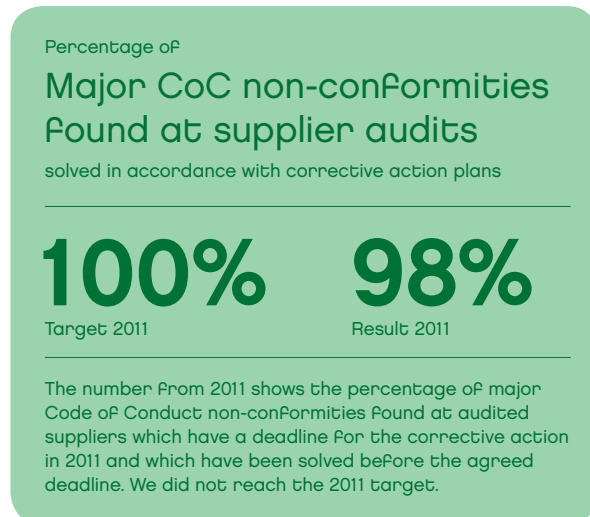
In 2011 we developed a corporate standard on marketing to children, which clarifies our position on this issue and ensures that when we market our products to children, we do it in a respectful and sensible way.

We expect that we in 2012 will continue and even reinforce our focus on supporting children's rights. We hope to do that in dialogue with our stakeholders, such as UNICEF and Save the Children.

Our Code of Conduct

We encourage our suppliers and business partners to respect their employees' human rights, and this includes providing them with decent working conditions.

Since 1997 we have required that our suppliers and business partners sign our Code of Conduct. We



monitor compliance with the Code of Conduct via independent on-site audits and engage in proactive co-operation and capacity building of our suppliers to promote sustainable supply chains. In 2011 we started to conduct 5-10 un-announced audits on a trial basis. This audit form has shown to be very successful and will be continued in 2012.

If there are conditions which do not meet our requirements, the supplier must draw up an action plan in dialogue and with the assistance of the LEGO



All our suppliers and business partners sign our Code of Conduct.

Group, including a timetable for corrections. This will be combined with a follow-up visit to check whether conditions have improved. Through a combination of action plans and follow-up visits, the LEGO Group is helping to secure a programme of steady improvement in the working conditions of its suppliers and business partners.

Our 2011 target for the resolution rate of the major non-conformities found at our suppliers was 100%. However, since we failed to close one major non-conformity we finalized the year with a resolution rate of 98%. The reason for this was that we expected to phase out a supplier where a non-conformity had been identified, but by the end of the year we realized that it was necessary to postpone the phasing-out until mid-February. The non-conformity will be closed in February 2012. Due to increase in production, the LEGO Group has increased the supplier portfolio in 2011. Many of these suppliers are located in human rights high-risk countries which has resulted in

an increase of Code of Conduct audits. However, in general we find fewer and fewer non-conformities at our regular supplier base. We believe that the main reason is the long-term relationship with our strategic suppliers base, which has been made possible through a joint effort to raise their performance. The stakeholder analysis that we conducted in 2011 shows among other things that ethical responsibility is important for our consumers. These findings led us to start work on refining our Code of Conduct management system in 2011. In addition to refining the Code of Conduct our focus has been on describing in more detail the various processes that we and our suppliers need to follow. We believe that further detail in our Code of Conduct will benefit the employees of our suppliers.

A major focus for us in 2011 has been to comply with the international standards on working hours in China, which prescribe a 60 hours working week, including overtime. We have seen difficulties with some of our suppliers in keeping within this standard. Due to the financial crisis, orders come in very late and it is difficult for suppliers to hire workers at short notice. Furthermore, people are no longer willing to travel far for jobs. These facts increase pressure on the workers already there.

This challenge has been discussed with all strategic suppliers. We are in a close dialogue to help them improve this issue for their workers, which includes looking at their working processes.

In 2012 the LEGO Group will continue to engage in capacity building and training of suppliers to address the challenges they may face in adhering to the standards of our Code of Conduct. Our aim is to ensure supplier ownership of good working conditions in their workplaces. We will also train workers in order to empower them to take a stronger role in asserting and protecting their own rights.

POINT OF VIEW

Stop Toying Around!

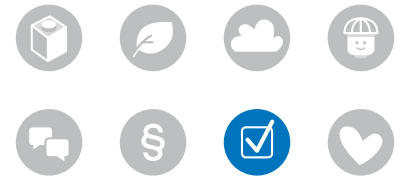
After more than a year of involvement with the LEGO Group, the "Stop Toying Around!" Campaign remains convinced of the ongoing dialogue. Dialogue builds trust. But dialogue is not a means in itself. Dialogue needs to continue while serious, sustainable improvements are achieved. Transparency and dialogue about positive changes are essential for supporters of the campaign, to decide whether the LEGO Group deserves their trust as a toy company with real commitment to high ethical standards that include factory workers in China.



Claudia Bonk, International Coordinator



Read more about human rights at
<http://aboutus.LEGO.com/sustainability>



Governance

In 2011 we continued to focus on good governance in a family-owned business, working with a professional management and cross-functional bodies to ensure transparency and follow up on our policies, standards and directions.

As a family-owned business it is important that we maintain professional management of our company, including a strong and competent board of directors in line with leading management practices, also with regard to good corporate governance.

Good governance in a family-owned company

Since the establishment of the LEGO Group in 1932, the company has been privately owned by the Kirk Kristiansen family. Our approach to good corporate governance is focused on combining the strengths and benefits of being privately owned with good corporate governance for listed companies. The LEGO Group and its owners are interested in managing the company in line with globally leading management practices, also with regard to corporate governance.

The benefits associated with being privately owned with few owners include having owners close to the business with strong industry knowledge and strong values, which can be inspiring and supporting for the development of the company and the employees. Other benefits are the ability for long-term focus, to move fast and be agile with regards to changes in the business environment.

Board of Directors

The LEGO Group Board of Directors consists of seven members. Three of these are considered dependent on the company; two due to ownership, and one due to being in the management of the parent company. The Chairman and three other members are considered to be independent.

As a family-owned business it is important to maintain a professional management of the company, including a strong and competent board of directors. One of the ways to support this is the practice the board has had for many years of electing the Chairman from among the independent board members. In general the company works to ensure a professional board management, including definition of required

board competencies to ensure a diverse and complementary composition of the board, regular board self-assessments, competitive compensation to the board of directors and clear and specific rules on mandate for each of the management bodies in the LEGO Group.

Furthermore, as a family-owned company, the LEGO Group is more exposed to the risks involved in the handover from one generation to the next. To mitigate this risk, a plan is prepared and implemented that results in high involvement of the next generation of the family owners in company matters related to the ownership.

Business integrity training

98%	100%	79%
Result 2010	Target 2011	Result 2011

Since 2009 we have had a target to secure the dedication to our business integrity among our leaders. We want to make sure that all employees at director level and above receive training in business integrity every two years.

In 2011 our business integrity programme was updated and a major group of employees at director level and above was due to complete a retraining in the last quarter. Due to the focus on changing the organisation in the last quarter (read more on page 40) several of these directors failed to complete the planned re-training bringing the number of trained directors in the organisation down to 79%. It is however, planned to reschedule the training and the target for 2012 will therefore remain at 100%.

Besides the employees at director level and above, several employees working directly with customers and suppliers have completed the training programme.



Corporate Management

The LEGO Group Management Board and Corporate Management were changed during 2011. The latest major organisational change was in 2005, and since then the LEGO Group has experienced significant growth both in number of employees and in revenue.

The biggest change in the new organisation is a new Corporate Management team, consisting of 22 members instead of previously six. Furthermore, the number of organisational layers has been reduced to ensure a flatter organisation, which ensures both a broader and a deeper perspective on the realities of business, while making it simpler and faster to make decisions.

The structure of the LEGO Group has also changed. Previously it had five business areas; Global Supply Chain (GSC), Markets & Products (M&P), Community, Education & Direct (CED), Corporate Center (CC) and Corporate Finance (CF). In the future, the LEGO Group will be organised in three areas:

- Operations
- Marketing
- Business Enabling

The new LEGO Group Management Board consists of the President and CEO, Jørgen Vig Knudstorp, the CFO (the CEO is also temporarily acting CFO), the COO, Bali Padda and the CMO, Mads Nipper. The Group Management Board together with 18 Senior Vice Presidents forms the new Corporate Management, which is the daily management body within the LEGO Group. The Management Board refers to the Board of Directors.

The cross-functional nature of the new corporate management facilitates collaboration, quick decision-making and clear authority delegation.

The LEGO Group has a corporate compliance board which has members from Corporate Management, including the CFO and the head of Corporate

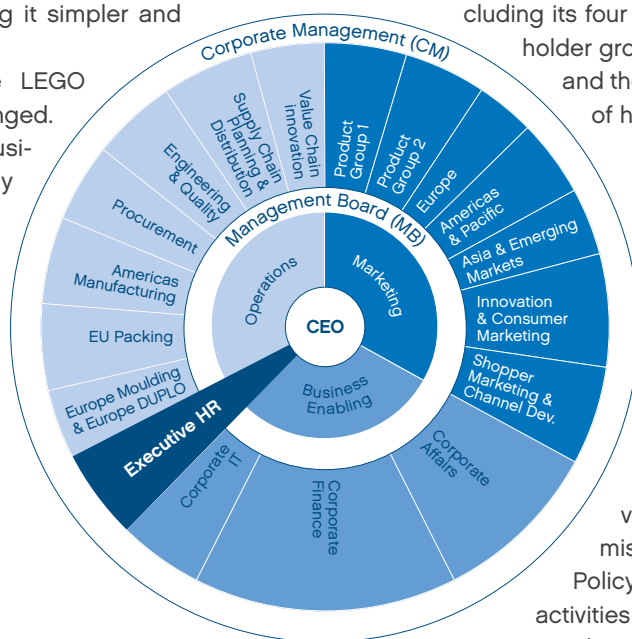
Legal Affairs. It has an explicit obligation to report to the Board of Directors on compliance matters.

Creating value with four promises

There is strong focus on ensuring the balance between the value created for the owners, compared to value creation for the remaining stakeholders of the company such as consumers, employees, customers and other partners. There is a sincere belief in the owner family that creating value for the company's stakeholders will also result in long-term value creation for the owners. The LEGO Brand Framework, including its four promises to various stakeholder groups, supports this thinking, and therefore is an important part of how we do business.

Policies

The LEGO Group has a framework of 12 corporate policies, which all provide position and guidance on various sustainability issues. For example our Responsibility Policy ensures that our spirit and company values are never compromised. Our Health and Safety Policy helps to ensure that all our activities are planned and executed in accordance with a healthy and safe working environment.

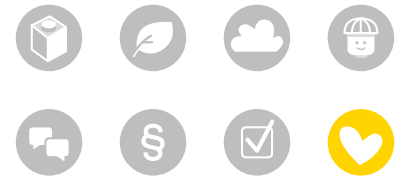


Whistle Blower

About five years ago, the LEGO Group introduced its whistle-blower function. This gives employees the opportunity to speak out about behaviour that they consider to be in violation of the guidelines that safeguard the integrity and policies of the LEGO Group, as well as any law or regulation. It is up to the employee to decide whether he or she wants to be anonymous. All reports are sent directly to the head of the LEGO Group's Corporate Legal Affairs.



Read more about governance at <http://aboutus.LEGO.com/sustainability>



The LEGO Foundation

In 2011, The LEGO Foundation reached out to 600,000 children – exceeding this year's target of 470,000 children. The total value of donations from The LEGO Foundation in 2011 was DKK 46 million in product donations and DKK 29 million in financial support.

The LEGO Foundation is a non-profit organisation that through its investment company owns 25% of the LEGO Group. The LEGO Foundation also manages three different donation programmes. In The LEGO Foundation, we believe that all children have the right to play and learn. Under the headline “We Care and Share” we make LEGO® products accessible and applicable for less privileged children around the world through our donation programmes such as Care for Children in Need, Care for Education and Care for LEGO Local Communities.

The work of The LEGO Foundation is based on the LEGO Brand Framework and like the LEGO Group, our mission is to “Inspire and develop the builders of

tomorrow”. This way, we provide the children of the world with the tools to help them take responsibility for their own lives – empowering them to be the architects and constructors of the future society.

The LEGO Foundation donates LEGO products all over the world, helping thousands of children, and organising activities that offer children and adults good experiences and insight into the many creative learning opportunities inherent in LEGO products. We enhance the education of the less privileged children via research programmes, systematic learning materials and supplementary education of teachers. It is The LEGO Foundation target to reach out to one million children in 2015.



Children in a slum area in Hyderabad, India, playing with LEGO® DUPLO® bricks received from private donors and the LEGO Foundation.



Related Foundations

In 2011 The LEGO Foundation also administered a number of related foundations.

Ole Kirk's Foundation supports non-profit and charitable, social, cultural, church-related, humanitarian and educational purposes, mainly in Denmark. One of the original purposes of the Foundation was to develop the local community around the LEGO Group into an attractive living environment for its employees. Ole Kirk's Foundation accepts applications from the general public, and caring for the weak and vulnerable in society is an important aspect in its work. The total value of Ole Kirk's Foundation donations in 2011 was DKK 33.6 million.

Edith & Godtfred Kirk Christiansens Foundation was formed in 1978 with the purpose of supporting non-profit and charitable projects. The Foundation supports a large number of cultural and church-related projects in Denmark and internationally. As regards cultural projects, the Foundation gives priority to new ideas and initiatives that enhance the quality of life and human values, especially as regards children, young people and families. Examples of the projects supported by the Foundation are the Center for ADHD and funding the establish-

ment of an SOS Children's Village in Jimma, Ethiopia. In 2011, the total value of donations by the Edith & Godtfred Kirk Christiansen's Foundation was DKK 15.9 million.

Each year, LEGO employees in Denmark can nominate projects for the **LEGO Employees' Anniversary Grant**. The grant's funds come from a collection among LEGO employees in Denmark in connection with the LEGO Group's 50th anniversary. The purpose is to give employees an opportunity to get involved in and submit projects that they consider important and interesting. The projects are typically small-scale projects where focus is on nearness and involving people they know, who have committed themselves to trying to make a difference for others.

In 2011, a total of DKK 250,000 was donated to 16 very wide-ranging projects – all nominated by LEGO employees. Recipients were causes such as a water pump run by solar cells for a school in Gambia and mattresses and beds for an orphanage in India, a centre for AIDS victims in Thailand, and a waste disposal system to improve health in a village in Guatemala.

Care for Children in Need

Running charity programmes often calls for in-depth knowledge of local practices. Therefore, the Care for Children in Need programme continues our co-operation with external organisations to help prioritize and successfully distribute LEGO Charity boxes.

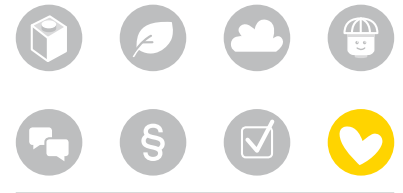
During 2011, The LEGO Foundation reached out to about 78 countries in five continents.

We signed a three-year collaboration agreement with UNHCR. The LEGO Foundation and UNHCR have been working together to bring LEGO Play boxes and DUPLO toys to child refugees and asylum seekers as well as stateless children and returning and internally displaced children being assisted and protected by

UNHCR. As an example, in co-operation with Save the Children we sent 1,800 boxes of LEGO Play boxes and LEGO DUPLO Play boxes to Dadaab in Kenya. Together with UNCHR we sent 1,200 boxes to Kakuma, also in Kenya. The LEGO Foundation has also contributed DKK 1 million to UNHCR emergency relief in the Horn of Africa, thought to be one of the worst humanitarian crises in the world today.

Care for Education

The Care for Education programme supports the development and improvement of underprivileged school systems by introducing and implementing the LEGO Learning System. By doing so, the communities



and school systems can provide an education that will motivate children to become self-directed, motivated learners, with the interest and capacity to become active citizens in their society.

The programme enters into long-term partnerships with ministries of education, NGOs, foundations or private companies with the same philanthropic goals as the LEGO Foundation. Through collaboration with local governments, we train and support teachers in practicing a child-centered educational approach. Our Care for Education programme combines product donations in combination teacher training, support, for infrastructure and research. The Care for Education programme covers age groups from early childhood to high school.

We support projects in various countries from Mexico to Ukraine and South Africa. One of several projects in China is a collaboration with the Ministry of Education that focuses on creativity and technology in schools. Another China project has in 2011 reached out to 50-60,000 children in migrant and village kindergartens in some of the poorest and most remote provinces of China. In Southern India, Tamil Nadu, we support 100 primary schools and high schools for casteless children and we have trained all teachers in ten selected play schools.

Care for LEGO Local Communities

Ever since Ole Kirk Kristiansen founded the LEGO Group in 1932, the family has been very much aware of their responsibility towards the local communities in which their employees live. The purpose of 'Care for LEGO Local Communities' is to take concrete local action, showing compassion and human interest, especially in the children in local communities.

The activities in Care for LEGO Local Communities have received a warm welcome from employees, because they are proud to be able to help make a difference in their own communities and experience the impact of their efforts at close hand. Decisions on which projects should receive help from LEGO employees each year are made by the employees themselves through the works councils.

Capital of Children

Through three generations, the Kirk Kristiansen family has believed in the importance of a strong engage-



Care for Education combines product donation with education. Our project in China is now up and running in 25 Chinese provinces.

POINT OF VIEW

UNHCR

– Engagement, efficiency and expertise are the values that guide the co-operation between the United Nations refugee agency (UNHCR) and The LEGO Foundation and make our multi-faceted partnership unique. The partnership is guided by our common vision that all children, everywhere, receive the quality education, development and well-being that is their right. Adding another layer to the partnership, the financial support of The LEGO Foundation to UNHCR's life-saving emergency relief in the Horn of Africa was a very timely response to the massive and urgent needs there. We are very proud of working with The LEGO Foundation and appreciate the enormous work of former LEGO employees and staff of the foundation.



Pia Prytz Phiri, UNHCR's regional representative for the Baltic and Nordic countries

ment in the Billund community. The vision of making Billund an international as well as national gathering point for children, creativity, play and learning began to take shape in 2011. Billund Municipality (Denmark) and The LEGO Foundation will each invest DKK 6 million in the new private-public partnership over the coming three years.

In 2012, the present Billund town hall building will be refashioned into an open knowledge centre, the Institute of Play & Innovation Science. The Institute of Play & Innovation Science will aim to attract researchers and businesses and create a space for experimentation making it possible for children of all ages to experience the learning of the future.

All of Billund Municipality can and will benefit from the Capital of Children. To give one good example, The LEGO Foundation has decided to donate a LEGO Lab to all schools in Billund Municipality in connection with the project. A LEGO Lab is a completely new specialist classroom which will give the students an opportunity to work far more creatively with problem solving, thereby bringing other competences into play in the learning process.



Read more about The LEGO Foundation at <http://LEGOFonden.dk>

CASE

The best reward is a child's smile

Each year The LEGO Foundation has supported more and more projects in the local community around the LEGO factory in Kladno, Czech Republic. The goal is to make the LEGO presence felt in the region and the projects focus on supporting and improving children's lives, creativity and development as well as improving their leisure time and making hospital stays more bearable and enjoyable.





Amongst this year's projects are providing LEGO® bricks for hospitalized children; building better access to the grammar school in Kladno to allow disabled children in wheelchairs to attend classes; and furnishing the foster home in Ledce – including help to build a new PC room for the children with active participation of local LEGO employees.

– Helping people, especially children, is the most beautiful of all work. There is no better reward than a child's smile. It is easy to just donate money, but there's no motivation. Therefore, we not only support children's homes financially, but we are also actively involved with the children in improving their environment. We are involved in painting their rooms and assembling their furniture, explains Jana Vlasáková, Works Council Chairman in Kladno.



Jana Vlasáková, Works Council Chairman, Kladno

Performance data

Stakeholder	Note ^{a)}	Measures	Results 2009	Results 2010	Targets 2011	Results 2011	Targets 2012
 Consumer		Consumer measures					
		Number of product recalls	1	0	0 ●	0	0
		Consumer complaint call rate, ppm	930	779	<= 800 ●	623	<= 550
		Net Promoter Score Index ^{b)}	126	120	>= 124 ●	120	^{c)}
 Employee		Employee profile measures					
	1	Number of employees	8,616	9,843		10,790	
	1	Female	45.3%	48.6%		47.4%	
	1	Male	54.7%	51.3%		52.6%	
		Average age	36.7	36.5		36.4	
	2	Rate of employee turnover	10.4%	9.3%		8.1%	
		Director level and above promotions (externally recruited or internally appointed) of female employees	20%	32%	>= 30% ●	23%	>= 30%
		Health & safety measures					
		Sick leave	2.9%	2.2%	<= 2.6% ●	2.1%	<= 2.3%
	3	Number of injuries with absence	61	44		36	
	4	Injury rate	4.8	3.0	<= 2.0 ●	2.1	<= 1.8
		Absence rate due to injuries	0.51	0.29	<= 0.26 ●	0.35	<= 0.20
		Employee commitment measures					
		Employees Pulse					
		- Work life range to global scorecard (LEGO EEI)	+3	+4	+0 ●	+6	+0
		- Motivation & Satisfaction range to global scorecard (LEGO EEI)	+11	+12	+10 ●	+14	+10
		- People Promise (departmental improvement rate)		51%	>= 80% ●	66%	^{d)}
		- Employee Net Promoter Score (LEGO EEI)					+0
 Partner		Business integrity measure					
		Percentage of Director level and above at LEGO sites trained in business integrity biennially	69%	98%	100% ●	79%	100%
		Key ESG measures at LEGO sites					
	5	Number of audits conducted at main LEGO sites	23	20		20	
	5	Number of major quality non-conformities found at main LEGO sites	0	5	0 ●	1	^{e)}
	5	Number of major EHS non-conformities found at main LEGO sites	0	8	0 ●	10	^{e)}
	5	Number of major CoC non-conformities found at main LEGO sites	1	1	0 ●	0	^{e)}
		Percentage of major quality, EHS and CoC non-conformities found at audits at main LEGO sites solved in accordance with corrective action plans					100%
		Key ESG measures in supply chain					
	6	Total number of core and extended line suppliers	231	117		154	
	7	Number of quality audited suppliers	2	33		47	
	7	Number of CoC audited suppliers	48	33		61	
		Number of major quality non conformities found at suppliers	3	26		33	
	8	Number of major CoC non conformities found at suppliers	36	66		64	
		Percentage of major quality non-conformities found at supplier audits solved in accordance with corrective action plans		100%	100% ●	100%	100%
		Percentage of major CoC non-conformities found at supplier audits solved in accordance with corrective action plans		100%	100% ●	98%	100%
 Surrounding environment		Customer satisfaction measures					
		Customer Pulse					
		- Overall satisfaction	123	123	>= 124 ●	126	127
		- Products	106	105		105	
		- Marketing	107	107		107	
		- Service	117	121		127	
		- Partnership	111	109		109	
		- Value	113	110		112	
		Resource measures					
		Raw material, plastic, 1,000 tonnes ^{g)}	36	42		49	
		Water consumption, 1,000 m3	116	220		225	
		Total energy consumption at production sites, GWh ^{g)}	155	174		198	
		Energy efficiency improvement	-	-	+5% ●	+2.4%	+2.5%
		Waste, tonnes	7,970	9,644		11,055	
		Recycled waste in percentage of total registered waste	88%	87%	>=85% ●	88%	>=88%

a) Please refer to the "Notes to performance data" section.

b) The NPS for 2010 was calculated using different measuring points than previous years. In order to compare results the 2010 results have been recalculated.

c) The NPS definition for 2012 has changed using different measuring points and weighting by consumer impacts. 2011 is new baseline (index 100). The target for 2012 is 102.

d) Measure is omitted due to changes in organisational set-up. New measure and target from 2012 is Employee Net Promoter Score (LEGO EEI).

e) Targets are omitted and new measure is Percentage of major quality, EHS and CoC non-conformities found at audits at main LEGO sites solved in accordance with corrective action plans.

f) 2009 and 2010 numbers have been updated due to changes in definition of material types.

g) 2010 number has been slightly corrected.

● Target met ● Target not met

Notes to performance data

Note 1, Total no. of employees

	2011	2010	2009
Female	5,118	4,790	3,900
Male	5,672	5,053	4,716
Total	10,790	9,843	8,616
Asia	219	184	160
Americas and Oceania	3,286	2,751	2,245
Europe	7,285	6,908	6,211
Total	10,790	9,843	8,616
Top management	50	47	46
Management	335	310	302
Other	10,405	9,486	8,268
Total	10,790	9,843	8,616

Note 2, New hires, rehires and terminations

	2011	2010	2009
New hires and rehires	1,754	2,731	1,780
Terminations	759	753	515

The number of employees dismissed by the LEGO Group in 2011 has been calculated at 336. (2010: 367) and 2009: 169)

Note 3, Number of injuries with absence

	2011	2010	2009
Americas	10	6	7
Europe	26	38	54
Total	36	44	61

Note 4, Injury rate per million working hours

	Q4/2011	2010	2009
Americas	2.4	1.8	2.2
Europe	2.0	3.3	5.6
Total	2.1	3.0	4.8

Note 5, Third party audits for main LEGO sites

	Certifications			Code of Conduct
	ISO 9001	ISO 14001	OHSAS 18001	
Billund, Denmark	1	1	1	n/a
Kladno (MC), Czech republic	1	1	1	n/a
Kladno (Production), Czech republic	1	1	1	n/a
Nyregyhaza, Hungary	1	1	1	n/a
Monterrey, Mexico	1	1	1	1
Hong Kong, China	1	n/a	n/a	n/a
Slough, UK	n/a	n/a	1	n/a
Enfield, USA	n/a	n/a	1	n/a
Munich, Germany	n/a	n/a	1	n/a
Total number of audits	6	5	8	1
Total number of major non conformities	1	6	4	0

Note 6, Total no. of suppliers split on Code of Conduct risk, end of 2011

	Direct	Extended	Total
China/Hong Kong	16	22	38
Mexico	13	0	13
Total high risk countries	29	22	51
Czech Republic	8	0	8
Hungary	7	0	7
Italy	3	0	3
Japan	0	0	0
Korea	2	0	2
Poland	3	0	3
Slovakia	2	0	2
Romania	1	0	1
Taiwan	0	1	1
USA	7	0	7
Total intermediate risk countries	33	1	34
Austria	2	0	2
Canada	1	0	1
Denmark	30	1	31
Germany	16	1	17
Great Britain	2	2	4
Netherlands	2	0	2
Switzerland	3	0	3
Sweden	9	0	9
Total low risk countries	65	4	69
Total	127	27	154

Only active suppliers with production in high and intermediate risk countries are audited.

Note 7, Total no. of BOM suppliers audited

	Code of Conduct	Quality
Total number of BOM audits	61	47
High risk countries	47	
Intermediate risk countries	14	

Note 8, Total no. of major Code of Conduct non-conformities found at suppliers

High risk countries	57
Intermediate countries	7
Total	64

The audits create a dialogue with the suppliers, and the major non-conformities set the main focus for the continuous improvement process.

The 64 major non-conformities for the Code of Conduct area can be summarized as:

- 16 related to working hours
- 4 related to wages
- 1 related to environment
- 27 related to health & safety
- 5 related to underage labour
- 1 related to freedom of association
- 4 related to employment terms
- 2 related to disciplinary practices
- 4 related to integrity, transparency and corruption

Definitions and calculation methods

Data have been calculated by consolidating data for the parent company (LEGO A/S) with data for all subsidiaries. The consolidation is based on data of a uniform nature and calculated using the same methods. However, data relating to health and safety only include data from plants with more than 100 employees. Similarly, environmental data only comprise production facilities. The measurement method remains unchanged from last year.

Data measurement methods and the basis of calculations are addressed below;

Consumers

Number of product recalls

Product recalls are calculated as launched products recalled from the market due to product safety issues and calculated per stock keeping unit.

Consumer complaint call rate

The consumer complaint call rate is calculated as the number of consumer complaints received relating to products launched in the year of reporting as a parts per million (ppm) of the number of products sold in the launch year. Due to the substantial Christmas trade, and in order to give a true and fair view, complaints received in January of the following year are also included in the calculation, corresponding to a 13-month period.

Net Promoter Score Index®

In connection with consumer contacts and the LEGO Group's online sales, randomly selected consumers are asked how likely they are, on a scale from 0-10 (10 = best), to recommend the purchased product or service to others. The development in promoters - level 9 and 10 - minus the development in the detractors - level 6-0 - is calculated and is shown in this Progress Report with 2005 as index basis.

Employees

Number of employees

Comprises all employees paid by the LEGO Group, including permanently employed staff, contractually employed staff, and trainees. The statement is calculated at the end of the year and measured as headcount.

Job classification

Senior Management comprises all Vice Presidents or levels above. Management comprises Senior Directors and Directors. The director level and above consists of Senior Management and Management. Other employees are included in the group "Others".

Rate of employee turnover

Employee turnover is measured as the number of permanent employees who have voluntarily left the LEGO Group during the reporting period compared to the average number of permanent employees during the reporting period. The average is calculated on the basis of monthly data. The number of new employments and rehires as well as dismissals is also stated.

Sick leave

Sick leave is calculated as time lost due to the employees' own illness. The sick leave is calculated as the number of absence hours as a percentage of the total number of working hours excluding holidays and non-business days. Only data from sites with more than 100 employees and LEGO Brand Retail stores are included.

Injury rate per million working hours

The number of occupational injuries is calculated as the number of occupational injuries resulting in at least one day's absence following the day of the injury. The rate of occupational injuries is calculated per million working hours. Only data from sites with more than 100 employees and LEGO Brand Retail stores are included.

Absence rate due to injuries

The number of absence hours as a consequence of occupational injuries. The rate is calculated per 1,000 working hours, and the absence is calculated from the day following the injury. Only data from sites with more than 100 employees and LEGO Brand Retail stores are included.

Director level and above promotions (externally recruited or internally appointed) of female employees

The number of female director levels and above promotions (externally recruited or internally appointed) is shown as a percentage of all promotions into the director level and above group of employees.

Employee Pulse

At the end of the reporting year, a survey, the Employee Pulse, is carried out in which all employees are asked to evaluate the LEGO Group as a workplace. The questions cover a wide range of the areas included in the LEGO Group strategy and measure the employees' motivation and commitment. The results are used to identify significant target areas at Group and departmental level.

New measure is Employee Net Promoter Score (E-NPS) based on the results for the Pulse question *"I would recommend the LEGO Group as an employer to other people"*. The E-NPS is calculated by subtracting number of detractors (1-6 on the 10-point scale) from the number of active promoters (answering 9-10). The 13 largest LEGO Group employment countries are included in the calculation.

Partners

Percentage of director level and above at LEGO sites trained in business integrity biennially

The percentage is calculated as director level and above (employed for more than three months) having completed the e-learning programme in Business Conduct biennially as a percentage of all director level and above (employed for more than three months) in the LEGO Group.

Number of audits conducted at main LEGO sites

The number of audits conducted at LEGO sites is calculated as third party audits connected to the certification process or voluntary Code of Conduct audits.

Number of major non-conformities found at main LEGO sites (Quality/EHS/CoC)

The number of major quality, EHS and Code of Conduct non-conformities found during third party audits conducted at LEGO sites.

Percentage of major quality, EHS and Code of Conduct non-conformities found at audits at main LEGO sites solved in accordance with corrective action plans

The percentage of major quality, EHS and Code of Conduct non-conformities found by third party audits at main LEGO sites which have a deadline for the corrective action in the reporting year and which have been solved within the agreed deadline.

Data relating to suppliers and business partners

The number of suppliers includes the LEGO Group's active direct suppliers calculated at the end of the reporting period. The number is broken down into direct suppliers and extended line suppliers. Direct suppliers deliver bill of material (BOM) components whereas extended line suppliers primarily deliver merchandise. Suppliers do not include indirect purchases. The number of suppliers who have been audited is calculated as the number of suppliers visited with a view to formalized monitoring and reporting of compliance with quality standards or Code of Conduct. The number of significant discrepancies is reported. These form the basis of the continued dialogue with the suppliers in order to continuously work on improvements.

Percentage of major quality non-conformities found at supplier audits solved in accordance with corrective action plans

The percentage of major quality non-conformities found at suppliers which have a deadline for the corrective action plan in the reporting year and which has been solved within the agreed deadline.

Percentage of major Code of Conduct non-conformities found at supplier audits solved in accordance with corrective action plans

The percentage of major Code of Conduct non-conformities found at audited suppliers which have a deadline for the corrective action in the reporting year and which have been solved before the agreed deadline. Non-conformities found at ICTI Care certified suppliers are not included.

Customer Pulse

To obtain an evaluation of the cooperation with retail customers in the reporting year, they are asked to give their perceived evaluation of the LEGO Group during January and February of the following year. The survey is used to track performance within the following six categories: 1) Overall satisfaction, 2) Products - questions are asked regarding innovation, packaging, assortment size etc. 3) Marketing - performance is tracked on the effectiveness of customer, in-store and promotion marketing etc. 4) Service - customers rate the LEGO Group regarding e.g. order lead-time, quality in delivery, on-time delivery etc. 5) Partnership - performance is tracked on joint planning, information sharing etc. 6) Value - questions related to stock turns, trading terms etc. are in focus. The consolidated data are shown in this Progress Report with 2005 as index basis.

Surrounding environment

Raw materials

Raw materials are calculated as plastic granulate used in manufacturing at LEGO sites.

Water consumption

Water consumption is calculated as the quantity of water supplied to the LEGO Group. Only data from LEGO Group sites with production are included.

Energy consumption

Energy consumption is calculated as the total energy in the form of electricity and heating supplied to the LEGO Group. Only data from the LEGO Group sites with production are included.

Energy efficiency improvement

The energy efficiency improvement is calculated as the rate between energy consumption and raw materials used. The data is shown with the previous year as baseline. Only data from LEGO Group sites with production are included.

Waste

Waste is calculated as the recorded quantities of waste disposed from the LEGO Group. Only data from LEGO Group sites with production are included.

Recycled waste

The recycled waste percentage is calculated as the recycled quantities of waste disposed compared to total quantities of waste disposed. Only data from LEGO Group sites with production are included.

Assurance statement

Assurance Statement for LEGO Group's stakeholders from the independent auditor.

We have reviewed the consolidated non-financial data of the LEGO Group's Progress Report for 2011 as expressed on pages 45-46.

Criteria for preparation of the Progress Report's non-financial data

The criteria for preparation of the Progress Report's non-financial data are the accounting policies described on pages 47-48. These contain information concerning which of the Group's business areas and activities are included in the reporting, types of data, and Management's reasons for choosing the data included. The non-financial data are factored in accordance with the accounting policies described on pages 47-48.

Delegation of responsibility

Company Management is responsible for preparing the Progress Report's non-financial data, including for establishing registration and internal control systems with a view to ensuring reliable reporting, specifying acceptable reporting criteria as well as choosing data to be collected. Our responsibility is, on the basis of our work, to express an opinion on the 2011 Progress Report's non-financial data.

Scope of our work

We have planned and completed our work in accordance with the International Auditing Standard ISAE 3000 (assurance engagements other than audits or review of historical financial information) for the purpose of obtaining limited assurance that the non-financial data presented on pages 45-46 have been computed in accordance with the stated criteria.

The obtained assurance is limited compared to that of an engagement with reasonable assurance. Our work has thus - based on assessment of materiality and risk - comprised inquiries regarding applied registration systems and procedures, review of data used in connection with preparation of the 2011 non-financial data, and

review of underlying documentation, including review of whether the scope of the 2011 non-financial data complies with described accounting policies for the 2011 non-financial data. During the review process, we have visited entities in Billund, Kladno and Enfield.

Conclusion regarding the 2011 Progress Report's non-financial data

Based on our review, nothing has come to our attention causing us not to believe that the consolidated non-financial data of the Progress Report of LEGO Group for 2011 have been presented in accordance with the stated criteria.

Copenhagen, 21 February 2012

PricewaterhouseCoopers
Statsautoriseret Revisionspartnerselskab



Henrik Kragh
State Authorised Public Accountant



Birgitte Mogensen
State Authorised Public Accountant

GRI and Global Compact overview and index

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Annual Report

In the Annual Report you will find detailed information on the LEGO Group's financial results for 2011.

<http://aboutus.lego.com>