

# **LENNOX** BUSINESS PARTNER CODE OF CONDUCT

Lennox International Inc. (“Lennox”) is committed to doing the right thing for our stakeholders - our employees, customers, business partners, shareholders, and the communities where we work and live. We do business ethically, honestly, and in accordance with applicable laws, regulations, and our Core Values of Integrity, Respect, and Excellence, which we define as:

## **INTEGRITY**

### **Accountability**

We deliver on our commitments.

### **Positive Engagement**

We energize and motivate others.

### **Trust**

We are always honest, ethical, and safe.

## **RESPECT**

### **Customer Experience**

We earn the loyalty of our customers.

### **Sustainability**

We care for our community and planet.

### **Talent**

We foster belonging and create opportunities to grow.

## **EXCELLENCE**

### **Innovation**

We embrace original ideas and creative solutions.

### **Quality**

We strive for continuous improvements.

### **Results**

We prioritize superior outcomes for our stakeholders.

We select business partners whose values and business practices align with these standards. Just as our [Code of Business Conduct](#) lays out expectations for our Lennox employees, this Business Partner Code of Conduct lays out expectations for our contractors, temporary employees, dealers, suppliers, distributors, third party intermediaries, joint venture partners, and other business partners (collectively, “Business Partners”). If a Business Partner fails to comply with Lennox’ Business Partner Code of Conduct, Lennox reserves the right to terminate the relationship with the Business Partner.

## **LAWS AND REGULATIONS**

Business Partners are expected to follow applicable laws and regulations wherever they do business and maintain books and records that accurately reflect all transactions related to Lennox.

## **ANTI-BRIBERY/CORRUPTION**

Lennox does not tolerate bribery or corruption from its employees or Business Partners. Business Partners acting on behalf of Lennox must comply with the U.S. Foreign Corrupt Practices Act, U.K. Bribery Act, and other applicable bribery, corruption, and kickback laws. Bribes can come in many forms (not just money) and are not always obvious. A gift, a job, a trip, a charitable contribution, or even favorable contract terms – anything of value – could be considered a bribe if offered to get or keep business or to gain an unfair advantage. Lennox prohibits bribery of government officials, as well as bribery between private parties and individuals. Business Partners must avoid giving anything of value to a government official on Lennox' behalf.

Lennox' Anti-Bribery/Corruption and Use of Third Party Intermediaries Policy is available [here](#). We encourage our Business Partners to have a similar policy in place.

## **ANTITRUST AND FAIR COMPETITION**

We expect Business Partners to comply with applicable antitrust, fair competition, and trade practice laws. Generally, these laws prohibit certain types of arrangements or discussions with competitors, customers, and suppliers that can unfairly restrict competition, including price fixing, price discrimination, bid rigging, group boycotts, tying arrangements, and market allocation.

## **CONFLICT MINERALS**

We expect our Business Partners to determine if their products contain conflict minerals, which include tin, tantalum, gold, and tungsten, and if so, implement supply chain due diligence processes to ensure that minerals are sourced responsibly and do not finance armed conflict or related human rights abuses in the Democratic Republic of Congo or an adjoining country.

Lennox' Conflict Minerals Policy is available [here](#). We expect our Business Partners to have a similar policy in place.

## **INSIDER TRADING**

We expect our Business Partners to comply with insider trading laws and to have systems in place to prevent their employees from trading securities based on material non-public (“inside”) information of Lennox or any other company. Inside information includes information not known to the public that has a reasonable likelihood to be considered important in an investor's decision to buy, hold, or sell securities.

## **TRADE COMPLIANCE**

We expect our Business Partners to follow applicable laws and regulations governing global trade for import and export matters wherever they operate or do business. This includes ensuring accurate and complete markings, labels, and documentation of goods, compliance with relevant economic sanctions and embargoes, and not participating in boycotts prohibited by the United States, Canada, Mexico, or the European Union.

## **HUMAN RIGHTS**

We expect our Business Partners to uphold basic human dignity, treat people with respect, promote equal opportunity for all, and prohibit the use of child labor, forced labor, and human trafficking within their operations and supply chain in adherence to International Labor Organization's Declaration on Fundamental Principles and Rights at work and the UN Guiding Principles on Business and Human Rights.

Lennox' Human Rights Policy is available [here](#). We encourage our Business Partners to have a similar policy in place.

## **SAFETY AND HEALTH**

We expect our Business Partners to comply with applicable safety and health laws and regulations and provide a safe and healthy work environment for their workers, Lennox employees, and others who could be affected by their activities.

## **HARASSMENT AND DISCRIMINATION**

We expect our Business Partners to prohibit harassment and discrimination based on age, race, color, sex, sexual orientation, gender identity and expression, genetic information, national origin, religion, disability, and any characteristic protected by applicable law.

## **DIVERSITY AND INCLUSION**

We expect our Business Partners to promote a workforce reflective of the communities in which they work and customers they serve and to foster an inclusive work environment.

## **FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

We expect our Business Partners to recognize and respect their workers' voluntary right to bargain collectively as well as their voluntary right to join or not join labor organizations in compliance with applicable laws and without intimidation.

## **WAGE AND HOUR**

We expect our Business Partners to provide fair compensation and benefits and comply with applicable wage, work hour, overtime, and benefit laws.

## **PRIVACY**

We expect our Business Partners to collect, use, and process personal information of Lennox' employees, customers, and third parties in accordance with applicable privacy laws.

## **ENVIRONMENT**

We expect our Business Partners to comply with applicable environmental laws and regulations and operate in a manner that minimizes their impact on the planet. Depending on the nature of their business, this may include recycling and reusing waste, preserving natural resources, reducing emissions generated by their activities, and avoiding or minimizing the use of hazardous substances.

## CONFIDENTIAL INFORMATION

We expect our Business Partners to protect Lennox' confidential information from improper disclosure and misuse. Confidential information includes all non-public information that might be of use to competitors or harmful to Lennox or its customers if disclosed. Our Business Partners should not disclose to Lennox confidential information of other companies unless authorized.

## CONFLICTS OF INTEREST

Lennox employees are expected to make impartial business decisions based on the best interest of Lennox and to avoid conflicts of interest, including those involving Business Partners. Business Partners should disclose actual, potential, or apparent conflicts of interest to Lennox and avoid activities that could be seen as unfairly influencing Lennox business decisions. For example, a Business Partner should not offer a gift to a Lennox employee during a business negotiation.

## MANAGING RISK

Having a Code of Business Conduct with supporting policies and processes, training employees on areas of risk related to your business, and conducting due diligence on business partners are best practices in ensuring compliance with applicable laws, rules, and regulations. Business Partners are expected to implement these measures commensurate with the size and nature of their business and engage business partners whose values align with this Code.

## REPORTING

If a Business Partner believes a Lennox employee's behavior or actions go against our Core Values or the law, they should promptly report it to a member of Lennox management or the Lennox Ethics & Compliance team at 1 (972) 497-7500 or [ethics@lennox.com](mailto:ethics@lennox.com). They can also report matters 24/7 in their preferred language through our third-party provider by:

- Visiting [www.lennox.ethicspoint.com](http://www.lennox.ethicspoint.com) or
- Calling our EthicsLine toll free at 1-855-LII-ETHICS (1-855-544-3844) from the U.S. or Canada. Click [here](#) for a list of international numbers.

The Webform and EthicsLine allow for anonymous reporting where permitted by law.

We expect our Business Partners to provide similar reporting options for their employees to raise internal legal and ethical concerns within their own organization and to prohibit retaliation against employees who speak up in good faith.

**TOGETHER, WE CAN WIN  
THE RIGHT WAY.**