

**SUBJECT:** **Human Rights Policy**

**APPLIES TO:** Lennox International Inc. and its operating subsidiaries

**APPROVED BY:** Chief Legal Officer

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### STATEMENT OF PURPOSE

To provide guidelines and outline our commitment regarding human rights throughout our operations and supply chain.

### SCOPE

This policy applies to Lennox International Inc. and its operating subsidiaries (“Lennox”).

### POLICY

**Introduction – Respecting and Protecting Human Rights:** As a global corporate citizen whose core values are Integrity, Respect, and Excellence, we have a responsibility to respect and uphold basic human dignity and human rights, including the rights of women and minorities, throughout our operations and supply chain. We do this in alignment with and adherence to:

- the UN Guiding Principles on Business and Human Rights (“UNGPs”),
- the UN Global Compact’s Ten Principles and the Sustainable Development Goals,
- the Universal Declaration of Human Rights,
- the OECD Guidelines for Multinational Enterprises,
- international labor standards, like the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, and
- applicable laws and regulations.

We expect suppliers, distributors, and other business relationships (collectively, “Business Partners”) to respect and uphold these principles and encourage them to adopt similar policies within their own businesses. Our [Code of Business Conduct](#) and [Business Partner Code of Conduct](#) provide additional guidance for what we expect from our employees and Business Partners, respectively. We will continue to grow existing programs and implement measures in this area. We are committed to engaging with stakeholders on human rights matters related to our business, where appropriate.

**Child and Forced Labor:** We do not tolerate the use of child labor, forced labor, or human trafficking within our operations and supply chain. We prohibit the employment of individuals under the minimum age allowed by applicable law. Our policies follow regulations, including the UK Modern Slavery Act 2015.

**Safety and Health:** One of our most important priorities is ensuring that every one of our employees around the world goes home safe at the end of each day. We are committed to providing a safe and healthy work environment from product design and manufacturing to installation and service. We constantly assess safety and maintain a healthy work environment through vigilance, training and awareness campaigns, policies and procedures, safety committees and champions, adherence to applicable laws, and regular observations and audits.

**Diversity and Inclusion:** We believe diversity and inclusion efforts play a critical role in the ongoing pursuit of equality. We support advancement opportunities to all persons and base employment decisions (e.g., recruitment, hiring, placement, development, training, compensation, and advancement) on merit, qualifications, and abilities.

**Harassment and Discrimination:** We are devoted to maintaining a work environment free from physical or mental harassment and intimidation. We do not allow discrimination on the basis of age, race, ethnicity, color, sex, sexual orientation, gender identity and expression, genetic information, national origin, religion, disability, or any other characteristic protected by applicable law.

**Wage and Hour:** When it comes to the workers who produce our products, we know that fair pay contributes to families, communities, and our business. We show our commitment to a living wage by complying with local and federal regulations, such as minimum wage and overtime payments. We conduct annual benchmarking to ensure our pay and benefits allow us to attract and retain the best talent in the industry.

**Freedom of Association and Collective Bargaining:** In accordance with the UN Global Compact's Principle Three, we recognize and respect employees' voluntary right to bargain collectively as well as their right to join or not join labor organizations in compliance with applicable laws and without intimidation.

**Privacy:** We respect the legitimate right to privacy and collect, use, and process personal information of Lennox' employees, customers, and third parties in accordance with applicable privacy laws.

**Environment:** We are committed to minimizing the environmental impact of our operations and continuously advancing sustainability in our products, services, and operations. This commitment includes recycling and minimizing waste, preserving natural resources like water, reducing emissions generated by our activities, and avoiding or minimizing the use of hazardous substances. We see access to clean air and water as basic human rights.

**Workplace Security and Security Arrangements:** Security safeguards for employees are provided, as needed, and maintained with respect for employee privacy and dignity. To the extent that private or public security providers are used, we expect such providers to respect human rights and the principles in this policy.

**Reporting Suspected Violations and Other Ethical Concerns:** We are committed to promoting a work environment where employees and others feel safe to report violations and participate in investigations without fear of retaliation. If you have a question or believe a Lennox employee or Business Partner is violating our values, this Policy, or applicable laws, you have a responsibility to act by contacting:

- A member of the Lennox Ethics & Compliance team (directly or at +1-972-497-7500 or [ethics@lennox.com](mailto:ethics@lennox.com)) or
- A member of the Lennox Legal Department

You can also report matters through EthicsPoint, which is provided by an independent third-party, is available 24/7 in a number of languages, and gives you the option to remain anonymous where allowed by law. EthicsPoint can be accessed:

- Online at [www.lennox.ethicspoint.com](http://www.lennox.ethicspoint.com) or
- By phone, toll free at 1-855-LII-ETHICS (1-855-544-3844) from the U.S. or Canada; visit <https://bit.ly/LIIGlobalEthicsLine> for a list of international numbers

Pick the option that is most comfortable for you. The important thing is to speak up! Lennox does not allow retaliation against employees for reporting violations or suspected violations.