

Lennox International Inc. (“LII”) 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

WE ARE HONEST AND ACCOUNTABLE. THAT’S HOW WE DO BUSINESS.



RESPECT

WE VALUE OUR COWORKERS, CUSTOMERS, BUSINESS PARTNERS, COMPETITORS, AND THE COMMUNITIES WHERE WE WORK AND LIVE. WE CHAMPION DIVERSITY AND INCLUSION.



EXCELLENCE

WE EXPECT HIGH PERFORMANCE FROM OUR EMPLOYEES AND BUSINESS PARTNERS AND HIGH QUALITY IN OUR PRODUCTS AND SERVICES. WE DELIVER VALUE TO OUR SHAREHOLDERS AND OTHER 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 LII 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”).

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 LII.

ANTI-BRIBERY/CORRUPTION

LII does not tolerate bribery or corruption from its employees or Business Partners. Business Partners acting on behalf of LII 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. LII 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 LII's behalf.

LII's 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.

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.

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



WAGES AND HOUR

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

FREEDOM OF ASSOCIATION

We expect our Business Partners to respect their workers' voluntary right to join or not join labor organizations in compliance with applicable laws.

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, LII employees, and others who could be affected by their activities.

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.

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.

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.

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.

CONFIDENTIAL INFORMATION

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

PRIVACY

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



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 LII 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.

CONFLICTS OF INTEREST

LII employees are expected to make impartial business decisions based on the best interest of LII and to avoid conflicts of interest, including those involving Business Partners. Business Partners should disclose actual, potential, or apparent conflicts of interest to LII and avoid activities that could be seen as unfairly influencing LII business decisions. For example, a Business Partner should not offer a gift to an LII 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 an LII employee’s behavior or actions go against our core values or the law, they should promptly report it to a member of LII management or the LII Ethics & Compliance Office at 1 (972) 497-7500 or ECO@lennoxintl.com. They can also report matters 24/7 in their preferred language through our third-party provider by:

- Visiting www.lennoxintl.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.**

