

**SUBJECT:** Conflict Minerals Policy

**APPLIES TO:** Lennox International Inc. and Its Operating Subsidiaries

**APPROVED BY:** Chief Legal Officer

TRACKING:	ORIGINAL DATE ISSUED	REVISION DATE	POLICY NO.	SUPERSEDES:	PAGES:
	July 5, 2022	NA	NA	NA	2

## INTRODUCTION

The Democratic Republic of Congo (“DRC”) and surrounding countries are rich in natural resources including the minerals from which tin, tungsten, tantalum, and gold (collectively, “Conflict Minerals,” as defined by U.S. Law) are derived. Armed groups, responsible for violence and human rights violations in the region, control a small amount of these Conflict Minerals and use the profits from their sale to fund their activities.

Lennox International Inc. is committed to conducting business with respect for human rights and in accordance with applicable laws, as outlined in our Code of Business Conduct, Business Partner Code of Conduct, and Human Rights Policy. As part of this commitment, we take steps to ensure our sourcing of any Conflict Minerals is done responsibly and does not help finance armed conflict or related human rights abuses in the DRC and surrounding countries of Angola, Burundi, Central African Republic, Congo Republic, Rwanda, South Sudan, Tanzania, Uganda, and Zambia (collectively with DRC, “Covered Countries”). We publicly disclose information related to the use of Conflict Minerals originating in the Covered Countries to the U.S. Securities and Exchange Commission.

## SCOPE

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

## POLICY

LII does not source Conflict Minerals directly from smelters or refiners. We have established a Conflict Minerals compliance program to help ensure suppliers conduct responsible conflict-free sourcing. We expect our suppliers to comply with applicable laws and to conduct due diligence on their respective supply chains.

LII abides by procedures under the Conflict-Free Smelter Initiative (“CFSI”) and relevant principles of the internationally recognized Organization for Economic Co-operation and Development (“OECD”) framework. We require suppliers to provide us with country of origin and smelter or refiner information (if applicable) for the materials or components they supply. We compare the smelters or refiners used by our suppliers with the CFSI list of compliant smelters to confirm responsible sourcing of Conflict Minerals. We also conduct additional due diligence, including assessing records for completeness and consistency. If a supplier refuses to adhere to this policy or non-compliance is detected, we reevaluate use of their materials in future projects.

Similarly, as a supplier ourselves, LII is committed to assisting customers' efforts to adhere to their legal obligations and responsible sourcing of Conflict Minerals. The processes and systems in place will assist in providing appropriate information to support customers' compliance efforts.

## **REPORTING SUSPECTED VIOLATIONS AND OTHER ETHICAL CONCERNS**

We are committed to the humanitarian goal of helping to end violent conflict in the Covered Countries. If you have a question or believe an LII 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 LII Ethics & Compliance Office (directly or at +1-972-497-7500 or [ECO@lennoxintl.com](mailto:ECO@lennoxintl.com)) or
- A member of the LII 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.lennoxintl.ethicspoint.com](http://www.lennoxintl.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! LII does not allow retaliation against employees or others for reporting suspected violations or participating in investigations.