

SUBJECT: Environmental, Health & Safety – Policy & Approach

APPLIES TO: All Facilities

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STATEMENT OF PURPOSE

Unite Towards “ZERO HARM IN ALL WE DO”

At Lennox, the health and safety of our employees is our utmost priority. We are committed to a safe workplace and support our safety goals through planning, training, performance management, and employee engagement.

Our commitment to preserve our natural environmental resources is unwavering. We drive sustainable development in our operations, promote renewable energy consumption, reduce our water footprint, and recycle materials to support a circular economy.

Driving innovation excellence in our products, services, and operations is at the core of our business strategy and embedded into our processes. Our processes are resilient and regularly reviewed. With appropriate oversight from Corporate EHS, Operations and Executive Leadership, and the Board of Directors our processes are robustly and fully engaged.

SCOPE

This document applies to Lennox and its operating subsidiaries, regardless of location.

OUR GOAL

Lead in safety, environmental compliance, and innovative sustainability efforts.

OUR COMMITMENT

Unite towards zero harm to our people, communities, and the planet in an ethical, responsible, and sustainable manner.

GUIDING BEHAVIORS IN ACTION FOR EHS

Specific behavior expectations for EHS are aligned with the Lennox Code of Business Conduct, Core Values, and Guiding Behaviors:

- **Positive Engagement:** We promote safety as everyone’s responsibility.
- **Sustainability:** We reduce our environmental impact through our operations and products, promote social responsibility, and maintain ethical business practices.
- **Innovation:** We leverage technology for process improvement and risk reduction.
- **Trust:** We will not compromise environmental, health, or safety values for profit or production.

APPROACH

Environmental, Health and Safety Management System (EHS):

Our EHS Management System (EHS-MS) aligns with the principles of the ISO 45001 and 14001 standards and describes our governance, process, and performance indicators as they relate to EHS at Lennox. We continue to improve our processes by focusing on risk identification and reduction using information and data from: risk assessments, observations, audits, inspections, and incidents. When an incident occurs, we identify and analyze the multiple causes of risk and implement sustainable corrective actions.

Compliance with the EHS-MS is verified through:

- Internal targeted assessments and audits which are conducted and overseen by Corporate EHS.
- External audits conducted at locations that are selected annually based on those locations that are identified as having the greatest opportunities for improvement.

Lennox's EHS Management System includes the following elements:

- Monitoring and measuring EHS performance and actions to prevent or correct non-conformance, while maintaining thorough records.
- Complying with all applicable local and federal laws and regulations governing employee safety and environmental protection.
- Maintaining a comprehensive EHS compliance program, including standards, procedures, and audits.
- Encouraging the use of non-polluting technologies and waste minimization in the design of products and processes.
- Promoting the conservation of resources and protection of the environment through recycling, reuse, and proper disposal of materials.
- Identifying potential hazards and environmental impacts associated with our operations, products, wastes, or services, and proactively addressing public concerns.
- Continuing to improve EHS performance, considering technical developments, scientific understanding, consumer needs, and community expectations.
- Providing job-specific training and education on EHS processes and procedures to promote awareness and address inherent risks present at each facility.
- Promoting consultation and participation of employees in the development of the EHS-MS.
- Maintaining clear procedures for internal and external communication of EHS information and incidents.

ROLES & RESPONSIBILITIES

To achieve and sustain our goal of *Zero Harm in All We Do*, everyone must be actively involved and held accountable for activities that impact our environment or the safety of themselves and others.

Leadership: Leadership oversight is provided by our CEO and Board of Directors. At the beginning of each year, our CEO reviews company-wide EHS plans with Business Segment Presidents, HR leadership, and operations leadership. Throughout the year, our Board and Public Policy Committee review our program and performance against established targets.

Lennox Corporate EHS: Corporate EHS is responsible for oversight and implementation of our EHS management system. Our EHS management system continuously improves. We develop, review, and set time frames to achieve objectives, reduce our environmental impact and employee injuries and promote projects to sustainably develop our business. While we look at root causes and implement corrective action immediately in case of an incident, we also review incident and risk data, documentation, training, and corrective actions with C-level executives and site/business management. Throughout the year, our Corporate EHS team coordinates regular meetings, audits, and site visits with operational and business leadership to discuss specific EHS topics, review incidents, and share best practices. Corporate EHS also manages, implements, and supports site EHS audits at selected factories and sites within our dispersed businesses. Annually, the Corporate EHS Team guides all factories and businesses in completing EHS plans for the coming year. Site Operations leadership review plans with C-level executives and Segment Presidents.

Site/Business Operations & EHS: Site/Business Operations and EHS teams are responsible for oversight and implementation of our EHS Management System within their entity. Operations and EHS are expected to educate employees, encourage them with recognition, celebrate milestones, and coach for performance improvement. Leaders are also expected to encourage their team members and foster an environment of open dialogue, where employees can contribute their best efforts to make positive changes. Leaders implement activity-based measurements to evaluate current processes and identify areas for improvement. By focusing on improving the effectiveness of our processes and procedures, we continuously improve and achieve our EHS goals.

Employees: Environmental and safety impacts should be considered in all work activities. We strive to create an environment where employees naturally follow procedures and work rules. To protect employees, the environment, and company assets, we encourage employees to report risks and incidents and provide feedback to each other and their leaders as outlined in the employee handbook. Our employees have an active role in helping us reduce energy, water, waste usage.

Our Partners: We expect our vendors, business partners, contractors, service providers, and distributors to uphold their commitment to comply with our EHS policies as embodied in our [“Lennox Supplier Sustainability Expectations”](#).

INITIATIVES & GOALS

Cross functional teams develop environmental initiatives and sustainability goals. Safety initiatives and goals are developed by Corporate EHS. Initiatives and goals are reviewed by the Lennox CEO and communicated across the organization. We track, dashboard, and communicate our progress towards our goals and initiatives. Each of our facilities regularly reports all required data completely and accurately. Lennox will never intentionally mislead stakeholders regarding our performance.

CHEMICAL RESPONSIBILITY

We monitor and maintain compliance with all chemical control laws and product hazard communication legal requirements. Chemical labeling and handling policies and processes have been communicated. Hazardous substances and associated wastes are identified and managed properly. Each new chemical introduced to a facility must be reviewed and approved before it may be brought on site and used in our products or processes. Safety Data Sheets are required for all purchased materials and chemicals and are reviewed by our EHS team. All employees who work with potentially hazardous chemicals receive applicable training, and we conduct appropriate periodic industrial hygiene monitoring.

DOCUMENT REVIEW

This document will be reviewed at least annually and updated as appropriate.

QUESTIONS

Questions should be directed to Lennox Corporate EHS or Communications.