Lennox International Reporting FAQs

We know that speaking up takes courage. It's also the right thing to do and what's expected of each Lennox International (LII) employee in order to maintain our ethical culture and protect our reputation. When we're all committed to speaking up, it becomes part of the culture – it's just what we do. These FAQs are designed to give you insight into the reporting process, so you know what to expect.

What's the purpose of LII's reporting options?
LII is committed to doing business the right way – aligned with our core values as outlined in the Code of Business Conduct. These reporting options are here so you can:

- Report issues that go against the law or our Code
- Ask questions when the right course of action is unclear
- Disclose potential conflicts of interest upfront

How can I report a concern or seek guidance related to LII's Code of Business Conduct?
To make things easy, LII offers several options:

- You can reach out directly to a manager, a member of the Human Resources Department, a member of the Legal Department, or a member of the Ethics & Compliance Office
- You can contact the Ethics & Compliance Office by phone at +1 (972)-497-7500 or by email at ECO@lennoxintl.com
- You can file a report with EthicsPoint, which is provided by an independent third-party, allows you to remain anonymous in most locations (if you choose), and is available 24/7 in a number of languages. EthicsPoint can be accessed online at www.lennoxintl.ethicspoint.com or by phone at 1-855-LII-ETHICS (1-855-544-3844) from the US or Canada; visit https://bit.ly/LIIGlobalEthicsLine for a list of international numbers

Pick the option that's most comfortable to you. The important thing is to speak up.

How do I disclose a potential conflict of interest – like outside employment/work, working with relatives and close friends, romantic relationships at work, gifts and entertainment, or ties to competitors and business partners?
The easiest option is to click the "Disclose a Conflict of Interest" button on the EthicsPoint webform (www.lennoxintl.ethicspoint.com). However, you can use any of the reporting options listed above. Once disclosed, the Ethics & Compliance Office, Human Resources, and your manager will work with you to evaluate the conflict and determine how best to address it.

Can you give me some examples of issues I should report?
We understand that "Code issues" can seem broad; here are some examples:

- Financial, accounting, or audit irregularities
- Falsification of documents or records
- Fraud or theft
- Bribery/corruption/kickbacks
- Misuse of confidential information or company resources
- Conflicts of interest
- Discrimination/harassment
- Retaliation
- Safety or environmental hazards, including workplace violence
- Human rights violations

Refer to the Code for additional topics.

I'm not really sure if what I observed violates our Code. What should I do?
Raise your concern. There is no harm in having someone evaluate the situation. It's better to speak up and be wrong than stay silent.

What kind of proof do I need before I raise an issue?
You don't need proof. Your responsibility is to speak up, and ours is to investigate the concern. Just provide as much detail as you can (*e.g.*, the name or title of the person engaging in the behavior, names of any potential witnesses, a description of the concerning behavior, the approximate date, time, and location of the behavior, any relevant documentation). The investigation team will prompt you for additional details, if necessary.

Can I report anonymously?
Yes, you can report concerns or questions anonymously* online or by phone through EthicsPoint, which is managed by an independent third-party. Anonymous means anonymous. EthicsPoint does not track or maintain identifying information from the reporter such as IP addresses, phone numbers, etc. Rather, all EthicsPoint reporters, including anonymous reporters, are issued a "report key" that they can use to check the status of their case and review and respond to follow-up questions from the investigation team.

Will my report be kept confidential?
Yes. The identities of the reporter and others involved, as well as the details of the report will only be shared on a need-to-know basis (*e.g.*, as necessary to conduct a full and fair investigation, or as legally required by law).

What if my concern involves a manager/HR; won't they see the report and know I submitted it?
No. Implicated parties <u>do not</u> receive a copy of the report, nor are they assigned to the investigation team. Generally, under our "need-to-know" approach, only the investigation team and members of the Ethics & Compliance Office see the report.

Will I be protected from retaliation?
Yes. We want employees to feel comfortable asking questions and reporting concerns, so we can ensure the Company is living up to its core values. LII prohibits retaliation against employees (and others where protected by law) who – in good faith – participate in an investigation, report a concern, or ask a question. In other words, you will not be terminated, demoted, moved to a different shift, excluded from meetings or communications, receive a negative performance evaluation, etc. because of your good faith report or participation in an investigation. If you suspect you or someone else is being retaliated against, report it immediately.

What is "good faith"?
Good faith means that you act with Integrity – reporting actual concerns that you believe to be true and accurately representing your facts and recollections. Reports can be made in good faith even if they are <u>not</u> ultimately substantiated.

Do I have to talk to my manager before I can use one of the other reporting options?
No. While your manager is often in the best position to address your questions or concerns, LII does not require you to follow a "chain of command" when it comes to reporting; you can reach out to anyone listed on the previous page. Pick the option that is best for you. The important thing is to speak up.

*Note that some countries (primarily in the E.U.) limit anonymous reporting in certain circumstances.

Can I report my concerns to outside agencies, or does LII require I report internally first?
While internal reporting is encouraged and gives LII a chance to understand and address your concern, nothing in this or any other document is intended to prohibit you from reporting concerns to outside government agencies at any time.

After I report my concern, what happens next?
LII's Ethics & Compliance Office will review your report and assign it to the correct team for investigation or handling – whether it be the Ethics & Compliance Office themselves, Human Resources, Legal, Asset Protection, or a combination. The investigators will review the case, determine whether additional information is required, and conduct the investigation. If the allegation is substantiated, corrective action will be taken.

Will I be interviewed?
The investigation team may need to interview you, by phone or in person, to better understand your concerns or to clarify information that arises during the investigation. If you have chosen to report anonymously, the investigation team can communicate with you through EthicsPoint.

I am part of an active investigation. Can I talk about it with other employees?
To protect the integrity of the investigation, we ask that you not share details with other employees – particularly other witnesses – until the investigation is concluded. The investigation team is responsible for contacting and speaking to any relevant witnesses. If there are people who you think should be interviewed, please tell the investigation team.

What if I remember something important after I file a report? Is there a way to provide more information?
Yes. You can share additional details with the investigation team at any point during the investigation by phone, email, or using your EthicsPoint "report key".

How long will the investigation take?
We strive to complete investigations within 30 days. That said, the speed of the investigation ultimately depends on the complexity of the allegations, the availability of witnesses, how quickly the reporter responds to follow-up questions from the investigation team, etc.

What happens after the investigation is concluded?
Once an investigation is concluded, the reporter is typically notified, either directly or via a message posted in EthicsPoint. While the reporter may receive high-level findings (*e.g.*, substantiated or unsubstantiated), any specific disciplinary actions against other employees will not be discussed.
The Ethics & Compliance Office reviews all closed cases to ensure consistency of the investigative process, discipline, and other corrective actions.

What happens if my concern is not substantiated?
Your concerns are important to us – even if they are not ultimately substantiated. In fact, similar to "near miss" safety reporting, unsubstantiated concerns can reveal additional training opportunities and process improvements that can prevent more serious situations in the future. So please – speak up!

If you have additional questions, please reach out to the Ethics & Compliance Office. We're here to help!