



INDIGENOUS PEOPLES PROTECTION POLICY

Commitment to Respect, Empowerment, and Sustainable Engagement with Indigenous Communities

Introduction

Lennox Group LLC recognizes the invaluable contributions, enduring history, and profound cultural heritage of Indigenous Peoples worldwide. As a global entity, we are committed not only to complying with international standards and local laws but also to upholding the highest ethical practices in our engagement with Indigenous communities. Our Indigenous Peoples Protection Policy lays the foundation for respectful, meaningful, and mutually beneficial relationships. This policy aims to ensure that our operations, projects, and partnerships honor the rights, traditions, and well-being of Indigenous Peoples, while fostering sustainable development and social equity.

Purpose and Objectives

The core purpose of the Lennox Group LLC Indigenous Peoples Protection Policy is to establish comprehensive guidelines that protect the rights and interests of Indigenous Peoples in all company activities. Our objectives include:

- Ensuring free, prior, and informed consent (FPIC) for all projects affecting Indigenous lands and resources.
- Promoting equitable participation, capacity building, and socio-economic development for Indigenous communities.
- Preserving and respecting Indigenous cultural heritage, knowledge, and traditions.
- Facilitating fair and transparent communication in all company dealings with Indigenous Peoples.
- Preventing adverse impacts on Indigenous Peoples and their environments caused by company operations.
- Supporting Indigenous self-determination and governance.



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Scope of the Policy

This policy applies to all Lennox Group LLC employees, contractors, partners, and subsidiaries, regardless of location. It covers all business activities—including exploration, development, construction, operations, procurement, and community engagement—that may affect Indigenous Peoples or their lands, territories, and resources.

Key Principles

Respect for Indigenous Rights

Lennox Group LLC acknowledges the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and the International Labour Organization Convention 169. We commit to respecting the rights of Indigenous Peoples, including land rights, self-determination, cultural integrity, and the right to participate in decisions affecting their lives.

Free, Prior, and Informed Consent (FPIC)

Before initiating any project or activity that may impact Indigenous Peoples, Lennox Group LLC will seek their free, prior, and informed consent. This involves:

- Providing complete and understandable information regarding the nature, scope, and potential impacts of proposed activities.
- Allowing sufficient time for communities to consider information and consult internally.
- Respecting community decision-making processes and traditional leadership.
- Documenting consent or dissent and incorporating it into project planning.

Cultural Heritage Protection

We recognize that Indigenous cultures represent living traditions with deep-rooted connections to the land and environment. Our commitments include:

- Identifying and mapping sites of cultural, spiritual, and historical significance in consultation with Indigenous communities.



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- Ensuring that company activities do not desecrate, damage, or disrupt these sites.
- Supporting cultural preservation initiatives and integrating traditional knowledge into project design and management.

Non-Discrimination and Equity

Lennox Group LLC prohibits discrimination based on ethnicity, culture, language, gender, or socioeconomic status. We strive for inclusive and equitable policies that promote equal opportunities for Indigenous Peoples in employment, education, and business partnerships.

Environmental Stewardship

The health of Indigenous communities is intricately linked to the health of their environments. Our environmental commitments include:

- Conducting rigorous environmental and social impact assessments (ESIAs) in partnership with Indigenous stakeholders.
- Implementing mitigation measures to minimize negative impacts.
- Restoring and rehabilitating affected lands and supporting community-led environmental monitoring programs.

Engagement and Participation

Community Engagement Mechanisms

Lennox Group LLC values the knowledge and perspectives of Indigenous communities. We strive for ongoing, genuine engagement by:

- Establishing regular communication channels and community liaison offices.
- Hosting public consultations, workshops, and participatory planning sessions.
- Offering translation and interpretation services to accommodate linguistic diversity.

Capacity Building and Empowerment

We commit to investing in the capacity and skills of Indigenous Peoples through:



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- Educational scholarships, vocational training, and leadership development programs.
- Supporting Indigenous entrepreneurship and local procurement.
- Partnering with Indigenous organizations for project implementation and monitoring.

Grievance Mechanisms and Remedy

Lennox Group LLC provides accessible, transparent, and culturally appropriate grievance mechanisms for Indigenous Peoples to raise concerns about company activities. These mechanisms include:

- Dedicated grievance officers and community liaison personnel.
- Clear procedures for submitting, tracking, and resolving complaints.
- Timely, fair, and respectful investigation and resolution of grievances.
- Options for mediation and independent review when needed.

Monitoring, Reporting, and Accountability

Monitoring and Evaluation

The company will regularly monitor compliance with this policy through:

- Annual self-assessment and third-party audits.
- Impact evaluations conducted with Indigenous participation.
- Continuous improvement plans based on feedback and lessons learned.

Transparency and Reporting

Lennox Group LLC is committed to transparent disclosure of its activities and impacts related to Indigenous Peoples. We will:

- Publish annual reports detailing progress, challenges, and case studies.
- Share findings with Indigenous communities and external stakeholders in accessible formats.



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Accountability and Governance

Responsibility for implementing and upholding this policy lies with the highest levels of company leadership. This includes:

- Appointment of a senior executive with accountability for Indigenous relations.
- Regular policy reviews and updates in consultation with Indigenous representatives.
- Mandatory training on Indigenous rights and cultural competency for all staff.

Partnerships and Collaboration

Lennox Group LLC believes in the power of partnership and collaboration to achieve positive outcomes. We will:

- Work closely with Indigenous organizations, governments, and civil society.
- Support joint decision-making and co-management of resources where appropriate.
- Share best practices and learnings across sectors and regions.

Continuous Improvement and Future Commitments

This policy is a living document. Lennox Group LLC is dedicated to ongoing learning, adaptation, and innovation in our relationships with Indigenous Peoples. We welcome feedback and commit to:

- Reviewing this policy at least every three years, or sooner if required by changing circumstances or community input.
- Exploring new ways to support Indigenous self-determination, economic development, and cultural resilience.
- Building a workplace culture that values diversity, respect, and reconciliation.

Conclusion

Lennox Group LLC recognizes that the protection and empowerment of Indigenous Peoples are not only moral and legal imperatives, but essential to sustainable business and



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social harmony. By upholding this Indigenous Peoples Protection Policy, we aim to contribute to a fairer, more inclusive, and more respectful world for present and future generations.

