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I. PURPOSE

Modine Manufacturing Company is committed to its responsibility to be an employer of choice and we are convinced that this is an important factor for the long-term success of our company. To fulfill this responsibility, Modine needs to remain competitive in order to be a value-based company. In that regard, we have agreed on the following global principles concerning our employees and the environment in which they work.

II. SCOPE

This policy applies to all employees of Modine Manufacturing Company and its worldwide subsidiary companies.

III. POLICY STATEMENT

A. Equal Opportunities

It is the policy of Modine to offer equal employment opportunity to all qualified employees and applicants, regardless of race, color, religion, national origin, sex, sexual orientation, age, disability or other protected characteristics. Our employment decisions will be based on business reasons, such as qualifications, talents and achievements and will comply with local and national employment laws.

B. Equal Pay for Work of Equal Value

The employment policies and practices of Modine have been and will continue to be such to ensure that no distinctions are made in rates of pay, opportunities for advancement (including training, promotion and transfer) and all other terms or conditions of employment.

C. Equal Chances Within a Global Company

Modine is a global company and supports employees willing to accept assignments in foreign Modine locations. We facilitate the transfer of our employees and their families in a manner that allows them a safe and positive assignment in the foreign country.

D. Non-Violent Working Environment

Modine requires a working environment free of threats, intimidation, harassment, or acts of violence against other employees, vendors, customers, visitors, or Company property. It is

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explicitly against our policy to bring weapons onto Company property or to any Company functions.

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E. Respect for the Individual

Modine is committed to treating each individual employee with fairness and respect and expects the same treatment among employees. A respectful workplace is about more than compliance with the law. Any harassing conduct, whether verbal, physical, or visual, that is based upon a person's status, such as sex, sexual orientation, color, race, ancestry, religion, national origin, age, disability, marital status, veteran status, citizenship, or other protected group status, or which is in any other manner not appropriate will not be tolerated by Modine

F. Safe and Healthy Working Environment

Modine is committed to continuous safety improvement resulting in the prevention of injuries and illnesses and the establishment of safe and healthy working conditions. Modine will insure a working environment free of drugs. No employee shall be engaged in the illegal use of drugs on or off the job. No employee shall report to work under the influence of or impaired by alcohol or any other substance that could prevent the employee from conducting work activities safely and effectively.

IV. COMPLIANCE RESPONSIBILITY

Every manager, supervisor, and employee shares responsibility for maintaining a safe, productive, and drug free work environment. It is each employee's responsibility to support this policy and to report immediately to his or her supervisor or their Human Resources Manager any instances, which may violate the letter or intent of this policy.