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I. PURPOSE

Modine Manufacturing Company (“Modine”) is committed to be an employer of choice in the communities around the world in which we operate. Maintaining a work environment that is respectful, fair, and safe for our employees is a key element of this commitment. In alignment with our core values, the following policy statements have been developed in support of maintaining a **Positive Work Environment** at each of our global locations. All local policies and procedures on related topics should align with, and support, this global policy (“Policy”).

II. SCOPE

This Policy applies to all employees of Modine and our worldwide subsidiary companies.

III. POLICY STATEMENT

A. Equal Opportunities


We offer equal employment opportunity to all qualified employees and applicants, regardless of race, color, religion, national origin, gender, sexual orientation, age, disability, gender identity, marital status, veteran status, citizenship or other protected characteristics. Our employment decisions will be based on business reasons, such as qualifications, talents and achievements and will comply with all local and national employment laws.

B. Equal Pay for Work of Equal Value

Likewise, we prohibit unlawful discriminatory actions taken in regard to rates of pay, opportunities for advancement (including training, promotion and transfer) and all other terms or conditions of employment. In addition, our practices regarding employee classification and the payment of wages/salary at our global locations will comply with the statutory requirements established by local wage and hour law at that location.

C. Equal Chances within a Global Enterprise

We are a global enterprise and support the willingness of our employees to accept assignments at locations globally, as required by our business needs. We facilitate the transfer of our employees and their families in a manner that allows them a safe and positive assignment in a foreign country.

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D. Non-Violent Working Environment

We require a working environment free of threats or acts of physical violence against other employees, vendors, customers, visitors, or our property. This includes behavior outside of the workplace, such as on business travel or at work-related meetings or social functions. It is explicitly against this Policy to bring weapons onto our property or to any of our functions, except as explicitly permitted in other written company policies in accordance with local laws.

E. Respect for Individual Differences

We recognize that individual differences bring unique and valuable perspectives to our enterprise, and strive to maintain an inclusive and collaborative work environment, in support of these differences. We are committed to respecting these differences and expect the same treatment among employees. Any inappropriate or discriminatory conduct, whether verbal, physical, or visual, that is based upon an individual's race, color, religion, national origin, gender, sexual orientation, age, disability, gender identity, marital status, veteran status, citizenship or other protected group status will not be tolerated by us.

F. Anti-Discrimination, Anti-Harassment, and Anti-Bullying/Mobbing

This Policy covers discrimination, harassment, and bullying/mobbing which occurs in the workplace and outside of the workplace, such as on business trips, or at work-related events. It covers discrimination, harassment, and bullying/mobbing by employees, including supervisors and managers, of other employees, contractors and members of the public, such as vendors and customers. It also covers discrimination, harassment, and bullying/mobbing by third parties such as customers, suppliers or visitors of our employees.

The core principle is that employees must treat others with dignity and respect and should, themselves, be treated with dignity and respect. Employees should always consider whether their words or conduct could be offensive.

The intent of the person who engages in such conduct does not determine if there is a violation of this Policy. What matters is how the conduct is perceived and whether a reasonable person would find the conduct offensive, and compromising of their dignity.

DISCRIMINATION AND HARASSMENT

As a general rule, "**discrimination**" includes treating someone differently because of a person's characteristic that is protected by applicable law, such as their age, race, color, gender, religion, national origin, disability, pregnancy, etc. In some cases, it may also arise when a criteria, that is neutral on its face, has an adverse impact on persons with one or more of the personal characteristics.

As a general rule, "**harassment**" is severe or pervasive conduct, based on a person's characteristic protected by applicable law (such as those mentioned in the previous

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paragraph), that is unwanted or offensive, that has the purpose or effect of violating a person’s dignity or creating an intimidating, humiliating, hostile or offensive environment, or because they are required to submit or refuse to submit to such offensive behavior as a condition of employment.

Examples of potential harassment:

- Unwanted and inappropriate physical contact or horseplay, including touching, pinching, pushing, grabbing, unnecessary brushing against someone, invading personal space and physical or sexual assault;
- Unwelcome sexual advances or suggestive behavior, and suggestions that sexual favors may further a career or that a refusal may hinder it;
- Stalking or persecuting a person with unwanted attentions, gifts or messages;
- Continued suggestions for dating, romance or social activity after it has been made clear that the suggestions are unwelcome;
- Sending or displaying material that is pornographic or that reasonable people find offensive (including emails, text messages, video clips and images sent by mobile phone or posted on the internet);
- Offensive or intimidating comments or gestures, or insensitive jokes or pranks that undermine the dignity of the person;
- Mocking, mimicking or belittling a person’s disability or age;
- Racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic, social, linguistic or religious group, or gender;
- Outing or threatening to out someone as gay or lesbian; and/or
- Shunning someone, for example, by deliberately excluding them from a conversation or a workplace social activity.


Persons may be harassed even if they are not the intended target. For example, a person may be harassed by racist jokes about a different ethnic group if they create an offensive environment for him or her.

BULLYING/MOBBING

“**Bullying**” or “**Mobbing**” (i.e., abusive conduct) is offensive, intimidating, malicious or insulting behavior involving the misuse of power that would make a reasonable person feel vulnerable, upset, humiliated, undermined or threatened. “Power” does not always mean being in a position of authority, but can include both personal strength and the power to coerce through fear or intimidation. Bullying/Mobbing can take the form of physical, verbal and non-verbal conduct.

Examples of potential bullying/mobbing/abusive conduct:

- Shouting at, being sarcastic towards, ridiculing or demeaning others;
- Physical or psychological threats;
- Acts of physical or psychological violence;
- Creation of arbitrary standards for one person, imposing unrealistic demands, micromanaging work or using supervision to intimidate a person;
- Inappropriate, exaggerated or untrue derogatory remarks about someone’s performance, particularly in front of others;
- Sabotage of work;

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- Abuse of authority or power by those in positions of seniority;
- Deliberately excluding someone from meetings or communications without good reason, or encouraging others to do so; and/or
- Stealing credit for another's work.

Legitimate, reasonable and constructive criticism of someone's performance or behavior, or reasonable instructions given to someone in the course of their employment, will not amount to bullying, mobbing or abusive conduct on their own. In many jurisdictions, a malicious motive is required.

G. Combating Trafficking in Persons


We strictly prohibit the trafficking of persons, the use of forced labor, or the procuring of commercial sex acts. Additionally, the United States Government has adopted a zero tolerance policy regarding Contractors and Contractor employees that engage in or support severe forms of trafficking in persons, procurement of commercial sex acts, or use of forced labor, as more fully set out in the United States' Federal Acquisition Regulation (FAR) 52.222-50(b). In the event a contract with the United States Government is involved, we will immediately disclose to the contracting officer and agency Inspector General, any credible evidence we receive from any source that alleges an employee, a subcontractor, a subcontractor's employee or their agent has violated the above-referenced zero tolerance policy, as well as the actions we've taken against such employee, subcontractor, subcontractor's employee or agent, pursuant to FAR 52.222-50.

H. Safe and Healthy Working Environment

We are committed to continuous safety improvement resulting in the prevention of injuries and illnesses and the establishment of safe and healthy working conditions.

Employees should report to work fit for duty and free of any adverse effects of alcohol or illegal drugs. The use, purchase, sale, possession, distribution, transfer, or manufacture of illegal drugs during working time, while on our property, while operating our machinery or vehicles, or while conducting our business is strictly prohibited. Employees are prohibited from consuming alcohol or being under the influence of alcohol during working time and/or while operating our machinery or vehicles. Employees are prohibited from performing work duties while taking prescription drugs, over-the-counter drugs, or other substances that adversely affect the employee's ability to safely and effectively perform their job duties. However, it shall not be a violation of this Policy for an employee with a current and valid prescription for a drug to use, possess, or be under the influence of such drug in the manner and for the purposes prescribed, if such use does not affect the employee's performance or create a risk to the safety of the employee or to others. Employees are responsible for learning the possible effects of prescription and non-prescription drugs they intend to use. Medicine shall be in its original container and shall be in the employee's name and shall have the doctor's name and prescription number on the label and should not be used in a manner other than prescribed.

I. Reporting A Breach Of This Policy

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Everyone has a responsibility to help protect our reputation and to prevent unethical or unlawful actions from happening. We realize that it is difficult to raise a sensitive issue, especially if it involves a supervisor or manager, a coworker or a situation in your work area. However, if you have any information about activities or behavior that conflict with or could be perceived to conflict with this Policy or a law or regulation, you have a duty to let us know.

You should report actual or perceived conflicts with this Policy, including incidents of discrimination, harassment or retaliation to your supervisor, your supervisor's supervisor or to a member of the Human Resources, Compliance or Legal teams.

However, If you are not comfortable doing so, or you would prefer to report anonymously, you may use our global Ethics Helpline. Please see: <https://secure.ethicspoint.com/lrn/media/en/gui/16966/index.html> to report on-line or via telephone.

We take all allegations of violations of this Policy seriously and will address them promptly. Any investigation will be conducted with the greatest degree of discretion consistent with completing a fair and thorough investigation.

Failure to comply with this Policy may subject an individual to discipline, up to and possibly including dismissal for cause, whether or not the individual's failure to comply results in a violation of law.

You also have the option to report a potential violation or retaliation/victimization to a local governmental agency.

J. RETALIATION

THERE WILL BE NO RETALIATION AGAINST ANY PERSON REPORTING, IN GOOD FAITH, A SUSPECTED VIOLATION OF OUR VALUES OR LEGAL OBLIGATIONS, INCLUDING THIS GLOBAL POLICY.

IV. COMPLIANCE RESPONSIBILITY

All employees are responsible for supporting the principles contained in this Policy and working with fellow employees to continually ensure compliance with this Policy.

Management serves as a role model for supporting these principles and is responsible for monitoring the level of compliance with this Policy within their areas of responsibility.