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I. PURPOSE

As described in our Code of Conduct ("Code"), Modine is committed to upholding high standards of moral and ethical behavior by its employees, suppliers, customers and partners. This Reporting and Investigation Policy ("Policy) is established to provide worldwide, consistent methods for employees and others to report any matters they believe may violate our Code or legal obligations, and for the investigation and resolution of all such reports. Each Modine subsidiary may supplement this Policy as required to comply with local laws. Individuals should refer to locally approved policies, and ask the Human Resources or Legal Department if individuals are unaware of local policies.

II. SCOPE

This Policy applies to all reports that relate to an alleged violation of our Code or legal obligations ("Reports"), and which are made through any of the channels listed in Section III.A. While it is acceptable for individuals with other concerns to utilize any of the communication channels identified below, the Company encourages individuals to report concerns about matters unrelated to Code or legal obligations to a member of their immediate management or a Human Resources representative for resolution in the ordinary course.

III. POLICY STATEMENT

All employees, customers, suppliers, and other interested parties including job applicants, former employees, consultants/advisors, volunteers, and third parties associated or connected with any of the persons listed above, such as relatives or union representatives, are strongly encouraged to provide any Reports immediately, through any of the communication channels listed below. It is expected that the responsible person identified below in Section III.A. will promptly provide any Reports to the Modine Business Ethics Committee (the "Ethics Committee"). Upon receipt, Modine will promptly and thoroughly investigate and resolve such Reports in accordance with this Policy and any additional local policy where applicable. Modine will treat Reports with as much discretion as reasonably possible and prohibits retaliation against individuals who make a good-faith Report.

A. Communication Channels

Modine encourages reporting through one of the following channels:

- An employee's immediate supervisor or that supervisor's supervisor
- The employee's plant manager
- Any Human Resources manager
- The appointed personnel in charge ("Whistleblowing Manager")
- Director of Internal Audit
- General Counsel, Chief Compliance Officer or any in-house lawyer employed by Modine
- o Chief Executive Officer
- Chief Financial Officer
- Ethics Helpline:
 - Toll-Free Number: 888-779-8055 (US/Canada only, international callers please reference dialing instructions for local access number)

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- To make a Report online: <u>www.ethicspoint.com</u>.
- The Ethics Committee:
 - By email <u>BusinessEthics@modine.com</u>.
 - By mail:
 - Modine Business Ethics Committee C/o General Counsel 1500 DeKoven Avenue Racine, Wisconsin USA 53403-2552

In addition to the above, additional communication channels may be listed and communicated by each Modine subsidiary. These communication channels provide timely notice to appointed Modine representative for a prompt and thorough investigation.

Reports can be made in writing, electronically, or orally. Oral internal Reports are made via telephone lines or voice messaging systems or, at the request of the whistleblower, through a direct meeting (face-to-face) set within a reasonable time. In Europe, the oral Report must be documented by the Whistleblowing Manager by full transcription which may be verified, rectified or confirmed by the whistleblower.

B. Reporting

Anyone who discovers or suspects actions or omissions that they reasonably believe violates our Code or legal obligations should make a Report through one of the channels noted above.

Reports made anonymously will be kept anonymous unless the reporter decides to provide his/her name during the investigation. The appointed investigators, Whistleblowing Manager, and Ethics Committee can obtain more facts and better determine the situation and any needed actions when they can communicate directly with the person reporting the matter of concern. Appointed investigators and Whistleblowing Managers shall be as discreet as possible under the circumstances and in full compliance with applicable local law, including maintaining the confidentiality of the identity of the reporting person, the person(s) involved and the person(s) mentioned in the Report, as well as the content of the Report and the related documentation.

Any person making a Report should:

- not attempt to contact the subject of the Report or witnesses or investigate the matter
- treat the Report with as much discretion as reasonably possible, including avoiding discussions of the case, facts, suspicions, or allegations with anyone not listed as part of the communication channels, above, unless specifically asked to do so by the individuals responsible for the investigation. It is critical we respect the privacy of all during the course of an investigation.
- C. Investigation Responsibilities
 - *The Ethics Committee* has the primary responsibility for the investigation of all Reports.

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- a. The Ethics Committee may satisfy this responsibility with the assistance of the Chief Compliance Officer, the Director of Internal Audit, the Company's Human Resources Department, the Company's Legal Department, and/or internal or external resources, as needed.
- b. The following country specific collaborations and inclusions are also required:
 The relevant Whistleblowing Manager must be consulted for Reports in
 - all EU plants.
 In addition, reports relating to Italy CIS entities must be done in collaboration with the Italian Supervisory Body.
- c. The Ethics Committee, or designee, must timely respond to the reporter and promptly investigate the matter being reported.
- All employees are expected to cooperate fully and communicate truthfully. While those conducting an investigation will be as discreet as possible under the circumstances, absolute confidentiality is not promised.
- All employees who are involved in the investigation are expected to treat the investigation and underlying situation with as much discretion as reasonably possible, including avoiding discussions of the case, facts, suspicions, or allegations with anyone not listed as part of the communication channels, above, unless specifically asked to do so by the individuals responsible for the investigation. It is critical we respect the privacy of all during the course of an investigation.

D. Resolution

If the investigation substantiates a violation of Modine's Code or legal obligations, the Ethics Committee will issue a report to appropriate Modine executives and, if appropriate, to the Board of Directors, through the Audit Committee. Such report shall include recommended corrective measures, with final decisions to be made in consultation with legal counsel, senior management and/or the Board of Directors or a Committee thereof.

- Any officer, director or employee found to have violated our Code and/or legal obligations will be subject to appropriate discipline, up to and including termination.
- In the event a third party (such as a supplier or customer) is found to have violated our Code or our legal obligations, Modine may reassess its relationship with that third party, as appropriate, including potential termination of its relationship with such third party.
- The Company may elect to prosecute or refer the matter to the appropriate law enforcement and/or regulatory agencies for independent investigation, if deemed appropriate after consultation with legal counsel, senior management and/or the Board of Directors or a Committee thereof.
- E. Retaliation is Not Permitted

MODINE WILL NOT TOLERATE RETALIATION AGAINST ANY PERSON REPORTING, IN GOOD FAITH, A SUSPECTED VIOLATION OF MODINE'S CODE OR LEGAL OBLIGATIONS. Any suspected retaliation should be reported through any of the channels listed in Section III.A.

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IV. COMPLIANCE RESPONSIBILITY

All employees are responsible for supporting the principles contained in this Policy and working with fellow employees to continually monitor the Company's compliance. Management serves as role model for supporting these principles and is responsible for monitoring compliance with this Policy within their area(s) of responsibility.

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.

By establishing and adhering to this Policy, Modine aims to foster a culture of transparency, integrity, and responsibility, ultimately safeguarding its reputation and promoting trust among its stakeholders.

Individuals are encouraged to report suspected violations of policy to their supervisor, human resources contact, Internal Audit, and/or the Modine Ethics Line without fear of retaliation. Whistleblower protection mechanisms are in place to safeguard the identity and rights of individuals reporting concerns.