

Lost or Stolen Modine Device?

As you know, security is very important at Modine. If your Modine-provided portable device, (such as a laptop, mobile phone, etc.), is lost or stolen, **you must report it immediately.**

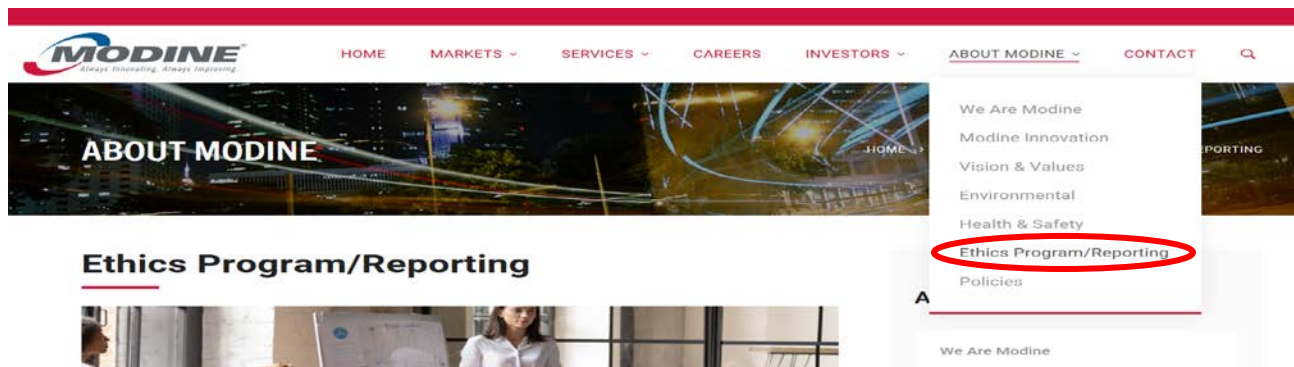
- If the loss or theft of a Modine-provided portable device occurs during your normal business hours, contact both your local HR Manager and your local IT team.
- If the loss or theft of a Modine-provided portable device occurs any other time (nights/weekends/holidays/vacations), contact the Ethics Helpline.
- In either situation, please state what happened and when, include your name, contact information, and whether or not a police report has been or will be filed.

The Ethics Helpline is available 24 hours/day, 365 days/year and is supported in multiple languages. Choose the appropriate option below and file a report within the EthicsPoint Reporting System.

The Ethics Helpline information can be found on the front page of [InsideModine](#):



Or, on [Modine.com](#) under *About Modine/Ethics Program/Reporting*:



Ethics Program/Reporting



Modine is committed to doing business the right way.

Modine has established programs and processes to support our highly ethical culture. Our code and global policies are located [here](#). We welcome comments, questions, or concerns.

TO ANONYMOUSLY REPORT AN ETHICAL CONCERN OR COMMUNICATE DIRECTLY WITH MODINE'S BUSINESS ETHICS COMMITTEE, PLEASE VISIT [ETHICSPPOINT REPORTING SYSTEM](#).

To ensure your privacy and allow you to report unethical or illegal activities safely and honestly with an organization's management or the board of directors while maintaining your anonymity and confidentiality, we provide you with this link to NAVEX. NAVEX Global is certified under the EU-U.S. and Swiss-U.S. Privacy Shield Programs through the United States Department of Commerce as having security measures in place to address EU privacy initiatives and other global privacy directives.

About Modine

We Are Modine

Vision & Values

Environmental

Health & Safety

Ethics Program/Reporting

Policies

Markets

HVAC

(Note: When you click on the *ETHICSPPOINT REPORTING SYSTEM* link you will be directed to a website hosted by our third party partner, NAVEX Global. If you access the Helpline from Modine.com, you will need to search for and select "Modine Manufacturing Company.")

At the very top of the first page, please choose your language:



Then, follow the on-screen instructions.

ATTENTION! This webpage is hosted on EthicsPoint's secure servers and is not part of the Modine Manufacturing Company website or intranet.

make a Report

Select the country in which you are located.

- Select -

Follow-up on a Report

Code of Conduct





Our Commitment

Modine has a long history of financial stability, dating back to our founding in 1916. Our business efforts are forged with an eye toward the future and are grounded in the principles of running an accountable and responsible corporation. To help us fulfill our responsibility, Modine has taken additional steps in establishing worldwide methods for employees and others to report any matters they believe may not be in line with Company values or legally acceptable standards. These include the following:

- Questionable or Improper Accounting and/or Auditing
- False Financial Reporting
- Business Conflicts of Interest
- Improper use of Confidential Information
- Insider Trading
- Fraud
- Product Tampering
- Bribery
- Actual or Threatened Illegal Acts or Criminal Violations
- Threats of Workplace Violence
- Workplace Harassment or Discrimination
- Environmental, Health or Safety Concerns
- Violations of Company Policy



Once you've answered the initial questions, if you wish to file your report over the internet (instead of talking to a person) you will be asked to choose an issue. Scroll down to "Data Privacy and Protection" and click on the arrow.

 Conflicts of Interest	This involves a situation in which an employee of the Company has a conflict of interest, that has neither been disclosed, nor been specifically permitted by the Company. A conflict of interest exists if an employee has an interest outside of work that interferes with work responsibilities and may affect his/her judgment on behalf of the company or is otherwise in violation of Company's conflict of interest policy. For example, a conflict of interest may exist if a family member of an employee is associated with a supplier. This includes business opportunities as well as gifts and entertainment concerns.
 Corporate Responsibility	This involves an actual or perceived violation of legal, regulatory, or any other requirements placed upon the Company, including environment, health & safety; product quality & safety; supply chain; political activities; conflict minerals; modern slavery; OSHA, HIPAA; human trafficking, etc.
 Data Privacy and Protection	This involves any theft, misuse or improper release/sharing of any personal data of any employee or third party.
 Fraud or Accounting Irregularities	This involves any potential accounting/control/auditing irregularity that may be a violation of law such as Sarbanes-Oxley, or other similar law and/or regulation, in any jurisdiction.

After that, you will need to complete the remaining information.

If you have any questions about the process or need further clarification, please contact either:

Andrew Detloff, Manager, Global Information Security
262-636-1352 (office), 262-308-7537 (mobile), Andrew.J.Detloff@modine.com

or

Kelsey Murphy, Senior Compliance Counsel
262-636-1577 (office), 312-504-7587 (mobile), Kelsey.C.Murphy@modine.com

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