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## I. PURPOSE

Modine Manufacturing Company (the “Company”) is a global company specializing in thermal management systems and components with a long history of and a strong commitment to operating with the highest ethical standards. The Company’s Code of Conduct (accessible at [www.modine.com](http://www.modine.com) ) (the “Code”) sets forth our guiding ethical principles and reflects our shared commitment to honesty, integrity, transparency and accountability. The Code applies to all directors, employees and those associated with or doing business on behalf of the Company, including the Company’s subsidiaries and affiliates.

The Company is committed to sourcing components and materials from suppliers that share the values expressed in our Code, which includes the respect of human rights. The Company has established a conflict minerals compliance program that is designed to follow the framework established by the Organization for Economic Cooperation and Development (OECD).

In July 2010, the United States passed the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Act”). Under the Act, all U.S. public companies are required to make certain disclosures regarding their purchase and use of Tin, Tantalum, Tungsten and Gold (together, the “3TGs”). The intent of the Act is to draw attention to the use of minerals mined in the Democratic Republic of Congo or adjoining regions, which directly or indirectly benefit armed groups that are responsible for severe human rights violations, and encourage U.S. companies to cease any use of 3TGs originating from this region that benefit armed groups.

## II. SCOPE


This policy applies to all of the Company’s suppliers, globally.

## III. POLICY STATEMENT

In order to assist the Company in its efforts to comply with the requirements and spirit of this Act, the Company expects the following of all of its suppliers across the globe:

- To commit to being or becoming “conflict free” by sourcing Tin, Tantalum, Tungsten and Gold from smelters that have been certified as “conflict-free” by an independent third party.
- To obtain declarations and evidence from all sub-suppliers in their supply chain and be prepared to share this evidence upon request from the Company.
- To complete an EICC/GeSI Conflict Minerals Reporting Template (CMRT) certifying the supplier’s conflict-free status and provide supporting documentation regarding the countries of origin of any tin, tantalum, tungsten and gold that the supplier includes in products sold to the Company. The latest version of the industry standard CMRT can be found at [www.responsiblemineralsinitiative.org](http://www.responsiblemineralsinitiative.org).
- To cooperate with the Company’s chosen compliance partner for any given reporting year.

Suppliers that fail to comply with these requirements may be subject to new business

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hold and a reconsideration of the Company's relationship with the supplier.

#### **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.

#### **V. OTHER (if applicable)**

##### **Additional Information and Resources**

Additional information on the Company's conflict minerals program can be obtained at <http://www.modine.com/web/en/supplier-policies.htm> or by contacting [conflictminerals@modine.com](mailto:conflictminerals@modine.com).

Information on the U.S. Conflict Minerals Rules can be obtained at <http://www.sec.gov/rules/final/2012/34-67716.pdf>.

