

Modine Supplier Code of Conduct



Table of Contents

GENERAL RESPONSIBILITIES	2
General Disclaimer	2
KEY EXPECTATIONS	3
Legal & Regulatory Compliance Practices	3
Privacy and Data Protection:	3
Trade	3
Antitrust:	3
Anti-Corruption:	3
Fraud and Deception:	3
Human Rights & Fair Labor Practices	3
Women's, Minority Groups', and Indigenous Peoples' Rights	4
Respecting Land Rights	4
Child Labor	4
Forced Labor & Trafficking in Persons	4
Conflict Minerals	5
Counterfeit Parts	5
Hiring & Employment Practices	5
Freedom of Association & Right to Collective Bargaining	5
Harassment	5
Compensation and Working Hours	6
Health & Safety	6
Environment	6
Business Practices & Ethics	7
Cybersecurity	7
Data Privacy	7
Gifts and Gratuities	7
Conflicts of Interest	7
Insider Trading	7
Confidential Information & Protection of Assets	7
Maintain Accurate Records	8
Supplier Management System	8
Supply Chain Transparency	8
Communication	8
CONTACT INFORMATION	8
Non-compliance reporting	8



MODINE SUPPLIER CODE OF CONDUCT

COMMITTED TO DOING BUSINESS THE RIGHT WAY

At Modine, we do business the right way, with no compromise. We expect that our employees and business partners, including our suppliers, comply with the laws, rules, regulations, and Modine policies of the countries and locations in which they operate. As a supplier, you must comply with the requirements set forth in this Supplier Code of Conduct (“Code”) and your contractual obligations to us. Additionally, Modine is a signatory to the United Nations Global Compact, and we expect all suppliers to respect internationally recognized human rights and promote compliance within their sphere of influence. In this Code, we strive to conform to the standards of the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the International Labour Organization’s Fundamental Principles and Rights at Work and the Universal Declaration of Human Rights, including the International Bill of Human Rights.

Modine suppliers must be familiar with the business practices of their suppliers and subcontractors, and operate according to this Code. Companies with whom we do business must embrace this commitment to integrity by complying with the code and training their employees on these topics.— . Modine requires its suppliers to provide timely and accurate data to Modine upon request. Modine may discontinue its relationship with suppliers who fail to comply with this Code.

General Disclaimer

This Code is in no way intended to conflict with or modify the terms and conditions of any existing contract between Modine and its suppliers. Unless otherwise stated in such contract, in the event of a conflict, suppliers shall adhere to the contract terms.

KEY EXPECTATIONS

Legal & Regulatory Compliance Practices

All Modine suppliers must conduct their business activities in full compliance with all applicable laws and regulations while conducting business with and/or on behalf of Modine, and must, without limitation, meet the following requirements:

Privacy and Data Protection: Comply with all applicable data protection laws, including the European Union's General Data Protection Regulation ("GDPR") and the California Consumer Privacy Act ("CCPA"). Suppliers must protect the confidential and proprietary information of others, including personal information, from unauthorized access, destruction, use, modification, and disclosure, through appropriate physical and electronic security procedures.

Trade: Comply with all international and local rules, regulations, and controls on any technology transfers (physical or electronic), exports, re-exports, imports, anti-boycott laws and sanctions. Supplier must not violate the export laws of the United States, United Kingdom, European Union, or other applicable jurisdiction. Modine is committed to complying with all laws administered by the U.S. Treasury Department's Office of Foreign Assets Control and all other governmental entities imposing economic sanctions and trade embargoes against designated countries, entities and persons ("Economic Sanctions Laws"). Our suppliers must comply with and certify that they comply with and shall continue to comply with, all applicable Economic Sanctions Laws and shall provide Modine with proof of such compliance upon request.

Antitrust: Conduct business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which they conduct business. Modine is committed to following the letter and the spirit of the law and promotes fair competition in the marketplace.


Anti-Corruption: Conduct business in full compliance with the U.S. Foreign Corrupt Practices Act ("FCPA"), the United Kingdom Bribery Act 2010 ("Bribery Act") and/or any other anti-corruption and anti-money laundering laws that govern the jurisdictions in which Modine suppliers conduct business (together the "Acts"). Depending upon business circumstances, these Acts can apply to Modine's activities across the globe, even though a law is enacted by one particular country, and the activities occurred in another country. Supplier shall comply with the Acts as if such laws applied to the supplier. Bribes, kickbacks, and similar payments are strictly prohibited. This ban applies even when local laws may permit such activity.

Fraud and Deception: Refrain from seeking to gain any advantage of any kind by acting fraudulently, deceiving people, or making false claims, or allow anyone else to do so. This includes defrauding or stealing from Modine, a customer or any third party, and any kind of misappropriation of property.

Human Rights & Fair Labor Practices

We expect all suppliers to respect internationally recognized human rights and ensure compliance within their sphere of influence. In this Code, we strive to conform to the standards of the United





Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the International Labour Organization's Fundamental Principles and Rights at Work and the Universal Declaration of Human Rights, including the International Bill of Human Rights.

Women's, Minority Groups', and Indigenous Peoples' Rights

Our organization is committed to upholding the principles of equality and non-discrimination, ensuring that all individuals are provided with equal opportunities in all aspects of employment and participation. Discrimination, harassment, or any adverse action based on gender, race, ethnicity, or indigenous identity is strictly prohibited. We provide reasonable accommodations to address the specific needs related to these protected categories. Modine is dedicated to continuous education and training to promote an inclusive environment and mandates the confidential reporting of any violations of this policy.

Respecting Land Rights

Suppliers must avoid practices involving forced eviction or the unjust deprivation of land, forests, or water resources. Activities related to the acquisition, development, or utilization of land, forests, and waters should not result in the displacement of local communities or the infringement upon their access to these vital resources. Rather, suppliers should implement measures to protect the rights of affected population areas and ensure that all resource management practices are conducted in a manner that respects both legal standards and the social and governmental rights of the communities involved.

Child Labor

Child labor must not be used under any circumstance. In the absence of local law, suppliers may not employ workers under the age of 14. Workers under the age of 18 may not perform work likely to jeopardize their health, safety, or education. If an employee is found to be under the legal working age, steps will be taken to ensure the child is enrolled in a proper education system.

Forced Labor & Trafficking in Persons

Modine strictly prohibits the trafficking of persons, the use of forced labor, the withholding of identity documents, or the procuring of commercial sex acts. Suppliers must not facilitate or participate in human trafficking; use forced, involuntary, or slave labor; or purchase materials or services from companies using forced, involuntary, or slave labor. Suppliers must not engage in deceptive recruiting practices, including misleading or defrauding potential workers about the nature of the work or asking them to pay recruitment fees. Suppliers must be able to certify that materials included in their products comply with the slavery and human trafficking laws of the country or countries in which they do business.

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.

Conflict Minerals

We are committed to comply with regulatory and customer requirements regarding the prohibition and restriction of substances, including hazardous substances and conflict minerals. Suppliers are expected to comply with Modine's Conflict Minerals Policy and to ensure that the goods provided to Modine are in compliance with requirements covered under the scope of all relevant regulations.

Suppliers should establish a policy to reasonably assure that conflicts minerals, which currently includes tin, tungsten, tantalum and gold, which may be contained in the products they manufacture, do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses. Suppliers should exercise, as may be directed by law, due diligence on the source and chain of custody of these minerals and therefore at a minimum require the same from their next tier suppliers. Upon request from Modine, suppliers are expected to report a chain of custody for relevant materials.

Counterfeit Parts

We expect our suppliers to develop, implement, and maintain effective methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products. In addition, suppliers shall provide notification to recipients of counterfeit product(s) when warranted, and exclude them from the delivered product.

Hiring & Employment Practices

Suppliers must prohibit discrimination based on race, color, gender, national origin, age, disability, union membership, religion, citizenship, political affiliation, veteran status, maternity, sexual orientation, marital status, gender identity or expression or other protected characteristics. Suppliers must accommodate all disabilities to the extent required by law.

Modine suppliers are expected to support diversity and equal opportunity in their workplaces.

Supplier's hiring practices must include verification of a worker's legal right to work in the country and ensure that all mandatory documents, such as work permits, are available.

Freedom of Association & Right to Collective Bargaining


Our suppliers must respect workers' rights to freedom of association, collective bargaining, and peaceful assembly (including the right to refrain from such activities) in accordance with local legal requirements and responsibilities.

Harassment

A core Modine principle is that employees must treat others with dignity and respect and should, themselves, be treated with dignity and respect. Modine likewise expects its suppliers to treat all workers with dignity and respect. Modine requires that suppliers investigate and take sufficient action when harassing or bullying behavior has been reported. Suppliers must not engage in physical abuse or discipline, the threat of physical abuse, or sexual or other harassment. Verbal abuse or other forms of intimidation are prohibited.

Our suppliers have a responsibility to prevent unethical or unlawful actions from happening. Our very strong expectation is that our suppliers voice any concerns to us (see "Contact Information" below). We expect our suppliers to provide an environment that allows employees to raise concerns without fear of





retaliation. Where it is allowed by law, suppliers should have a system that allows employees to anonymously report their concerns.

Compensation and Working Hours

Our suppliers must comply with applicable wage and hour labor laws and regulations governing employee compensation and working hours, including overtime. We require our suppliers to not engage in unlawful discriminatory actions taken regarding rates of pay, opportunities for advancement (including training, promotion, and transfer) and all other terms or conditions of employment. In addition, Modine requires suppliers' practices regarding employee classification and the payment of wages/salary at its global locations to comply with the statutory requirements established by local wage and hour law at that location.

Health & Safety

Our suppliers must provide workers with a safe and healthy work environment. They should take proactive measures that support accident prevention and minimize health risk exposure. Our suppliers must ensure their operations comply with all laws related to health and occupational safety.

Modine requires its suppliers to:

- Take a proactive approach to promptly resolving health and safety issues.
 - Promote and maintain safety systems and, through a behavior-based approach, achieve
 - personal accountability and responsibility for safety at all levels in the supplier's organization.
 - Educate and train all employees to ensure appropriate safe practices are followed.
 - Implement continuous safety improvements resulting in the reduction of injury and illness risk.
 - Support the continual improvement of supplier's health and safety performance.
- Comply with or surpass all applicable governmental health and safety regulations and other requirements.

Environment

Modine recognizes its social responsibility to protect the environment. We are committed to minimizing the impact of our manufacturing operations on human health and the environment and to implement improvements for environmental protection that are consistent with our business principles and values.

Our suppliers are also expected to conduct their operations in a way that minimizes the impact on natural resources, biodiversity, and protects the environment, customers, and employees. They must ensure their operations comply with all applicable laws related to air emissions, water discharges, toxic substances, soil quality, noise emissions and hazardous waste disposal.

We require our suppliers to:

- o Take a proactive approach to resolving environmental issues.
- o Educate and train employees to adhere to sound environmental practices.
- o Consider environmental aspects during product development.
- o Design products with end-of-life considerations for easy disassembly and efficient recycling or safe disposal whenever possible.
- o Partner with Modine to meet our goals, including material use, recycling, reuse, and end-of-life.
- o Conserve resources, reduce energy use and emissions and work towards decarbonization

- Prevent pollution, reduce the use of toxic chemicals, and minimize waste.
- Use water in a responsible manner and work to reduce water usage.
- Fulfill all compliance requirements.
- Continually improve their Environmental Management System.
- Provide timely and accurate data upon request.
- Ensure that Tier 2 suppliers adhere to similar standards.

Business Practices & Ethics

Cybersecurity

All employees, business partners, and suppliers must follow strict cybersecurity practices to protect sensitive data and systems. This includes maintaining data confidentiality, using strong access controls, and complying with security policies. Systems and devices should be kept updated and secure.

Data Privacy

Data privacy rules must be followed to protect personal and sensitive information. All data must be handled according to privacy laws, ensuring it is collected, stored, used, and disposed of properly. Access to personal data should be limited to those who need it and strong security measures like encryption are highly encouraged.

Gifts and Gratuities

We ask that our suppliers use good judgment when exchanging business courtesies. Gifts, meals, entertainment, hospitality, and trips that are lavish or lack transparency or a legitimate purpose may be viewed as bribes, may create the appearance of a conflict of interest, or may be perceived as an attempt to improperly influence decision making. Never give anything to gain an improper business advantage. Gifts and entertainment are generally acceptable so long as the value is truly trivial or nominal, the frequency is not excessive, and there are no circumstances that could lead a reasonable person to believe the gift or entertainment is being provided to influence judgment.

Conflicts of Interest


Our suppliers must be honest, direct, and truthful when answering questions from Modine about relationships with Modine employees. Suppliers should disclose available information about conflicts of interest, including disclosure of a financial interest of any Modine employee in any of supplier's business. Suppliers should not deal directly with any Modine employee whose spouse, domestic partner, other family member or relative holds a financial interest in the supplier.

Insider Trading

Insider trading is strictly prohibited. Under U.S. federal securities laws, you cannot buy or sell Modine or another company's securities when in possession of information about Modine or another company that is (1) not available to the investing public; and (2) could influence an investor's decision to buy or sell the security.

Confidential Information & Protection of Assets

We expect our suppliers to preserve, protect and responsibly use all Modine assets they have access to. This includes tangible as well as intangible assets, such as our brands, technology, business information



and intellectual capital. Proper management of confidential information is critical to the success of both Modine and suppliers. Suppliers must not make unauthorized disclosures of trade secrets or other sensitive information belonging to Modine or our customers – either during their contract with Modine or thereafter. When sharing Modine information with others such as sub-suppliers, our suppliers must ensure appropriate controls are in place to protect Modine interests.

Our suppliers may not use the Modine trademark, images, or other materials to which Modine owns the copyright, unless explicitly authorized by Modine in writing.

Maintain Accurate Records

Suppliers are expected to create accurate records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. Records should be retained based on the applicable retention requirements.

Supplier Management System

We expect our suppliers to have a management system that ensures they comply with applicable laws, regulations, and Modine policies; conform to this Code; and identify and reduce operational risks related to this Code. The supplier management system should also promote continuous improvement and compliance with changing laws and regulations. System training for employees should be provided.

Supply Chain Transparency

Supply chain transparency is required to confirm compliance with this Code. To monitor this, Modine may request documentation, conduct onsite audits, review, and approve corrective action plans, and verify implementation of corrective action. This includes, but is not limited to, supporting Modine's reporting requirements pertaining to restricted substances and conflict minerals. Suppliers commit to providing regulatory, compliance and sustainability information upon request, and completing sustainability assessments as directed.

Communication

Suppliers are expected to assist Modine in enforcing this Code by communicating its principles to their supervisors, employees, and suppliers.

Contact Information

Any supplier may direct questions or comments about our Code to their supply management representative.

Non-compliance reporting

Modine is committed to ensuring that all its stakeholders are able to report grievances and we are committed to provide appropriate remedies when non-compliance occurs. We also encourage suppliers to establish a grievance mechanism in their own operations. Violations of this Code can be reported confidentially through the Modine Helpline®. The Modine Helpline® is an internet and telephone service that has been created to allow any Modine employee or supplier an opportunity to report significant company issues in a confidential manner. By calling (888) 779-8055 (US/Canada only, international callers please reference dialing instructions for local access number), suppliers will be put in touch with a representative from EthicsPoint to collect and report information to Modine's Ethics Committee. To make a report online, please go to <https://www.modine.com/about-modine/ethics-program-reporting/>.

To contact Modine's Ethics Committee directly: **Modine Business Ethics Committee**
c/o General Counsel
1500 DeKoven Avenue
Racine, Wisconsin USA 53403-2552.
ethicscommittee@modine.com

The Ethics Committee will handle reported matters in a confidential manner, and will endeavor to preserve anonymity, if desired, in a manner consistent with the best interests of the parties involved and legal requirements.

Modine will not permit any retaliation against any individual who, in good faith, makes a report to the Ethics Committee.

EthicsPoint is NOT a 911 or Emergency Service:

Do not use this site to report events presenting an immediate threat to life or property. Reports submitted through this service may not receive an immediate response. If you require emergency assistance, please contact your local authorities.

Publication Date: June 2025