I. PURPOSE

This policy affirms Modine's commitment to responsible governance, human rights, and environmental stewardship. Modine adheres to internationally recognized standards, including the Ten Principles of the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. Modine´s actions and decisions are driven by our purpose: Engineering a cleaner, healthier world.

II. SCOPE

This policy applies to all employees of Modine Manufacturing Company and its worldwide subsidiary companies.

III. POLICY STATEMENT

A. Governance & Ethical Conduct

Modine conducts its business in an ethical, professional, and sustainable manner through a robust governance structure.

1. Oversight: The company's Board of Directors oversees its sustainability and human rights strategy. The Business Ethics Committee is responsible for policy implementation and compliance.
2. Code of Conduct: The Modine Code of Conduct guides the company's daily operations and sets the foundation for its ethical and legal obligations. Modine provides all employees with mandatory annual training on the Code.
3. Anti-Corruption: Modine prohibits corruption in all forms, including bribery, extortion, embezzlement, or any other means of obtaining an improper advantage.
4. Reporting & Non-Retaliation: Modine provides confidential and anonymous channels for employees and stakeholders to report concerns or grievances without fear of retaliation. The company protects "whistleblower" confidentiality and thoroughly investigates all reports. Reports can be made via the Helpline at 888-779-8055 (U.S./Canada) or online through www.ethicspoint.com.

B. Human Rights & Labor

Modine respects and supports internationally recognized human rights in all its activities.

1. Forced Labor & Human Trafficking: Modine maintains a zero-tolerance policy for all forms of forced or compulsory labor. Employment is voluntary, and workers may terminate their employment in accordance with local law without threat or penalty. Modine prohibits unreasonable restrictions on workers' freedom of movement.
2. Child Labor: Modine upholds the effective abolition of child labor. The company verifies proof of age at the time of hiring.
3. Health, Safety & a Positive Work Environment: Modine provides a safe, healthy, and positive work environment free from harassment, abuse, and unlawful discrimination.

4. This standard extends to all security personnel, who must perform their duties with respect for human rights.
5. Fair Wages & Working Hours: Modine complies with all applicable wage, hour, and benefits laws. The company provides wages and benefits that meet or exceed legal requirements. Wages are paid on a regular, documented schedule. Standard working hours, excluding overtime, shall not exceed the maximum set by local law. Overtime is compensated at a premium rate in accordance with legal requirements. Workers are provided with legally mandated rest periods, time off, and public holidays.
6. Freedom of Association, Collective Bargaining & Social Dialogue: Modine respects the legal right of employees to freely associate, form, join, or not join a union, and to bargain collectively. The company fosters constructive social dialogue with its employees and their representatives. No employee will face discrimination or retaliation based on their membership or non-membership in any worker organization.
7. Inclusion: Modine promotes a globally diverse and inclusive workforce, free from discrimination based on race, gender, pregnancy, sexual orientation, age, disability, ethnicity, religious beliefs, or other legally protected characteristics.

C. Environmental Stewardship

Modine actively works to minimize its environmental impact through conservation, pollution prevention, and sustainable innovation.

1. Climate Action & Energy Reduction: Modine commits to proactive management of greenhouse gas emissions and energy consumption and sets public targets to drive performance.
2. Water Stewardship: Modine promotes responsible use of water and works to reduce consumption across its operations.
3. Pollution Prevention & Waste Reduction: The company actively prevents pollution, reduces the use of toxic chemicals, and minimizes waste.
4. Sustainable Products & Innovation: Modine considers environmental impacts during product development and designs products for efficient manufacturing, use and end-of-life.

D. Responsible Supply Chain

Modine extends its commitment to sustainability and human rights throughout its supply chain.

1. Supplier Expectations: Modine requires its suppliers and business partners to adhere to the principles outlined in this policy and the Modine Supplier Code of Conduct.
2. Human Rights Due Diligence: The company conducts a human rights due diligence process, including regular supplier assessments, to identify and evaluate potential risks and ensure compliance.
3. Economic Inclusion: Modine promotes economic inclusion and diversity within its supply chain by providing opportunities for local businesses.

E. Transparency & Accountability

Modine commits to transparency by setting clear goals, measuring performance, and engaging with stakeholders.

a. Public Reporting: The company reports on its sustainability efforts and progress through its annual Sustainability Report.
b. Goal Setting: Modine sets targets that support the UN Sustainable Development Goals and other global priorities.
c. Stakeholder Engagement: The company engages with independent external stakeholders to ensure its data and reporting remain objective and credible.

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.