

		Global Policy		
Title:	Trade Compliance		Responsible Party: Trade Compliance Counsel	
Next Review Date:	October 2018	Last Review Date:	October 2016	Page 1 of 2

I. PURPOSE

This trade compliance policy reflects our commitment to operate in accordance with Modine’s Code of Ethics and Business Conduct. It also recognizes that failure to meet trade compliance requirements can have serious consequences for Modine, including damage to the company’s reputation, monetary penalties, and suspension/revocation of the company’s exporting or importing privileges with a resulting negative impact to our suppliers and customers. Thus, we are committed to the implementation, maintenance and continuous improvement of a robust global trade compliance program which integrates compliance activities into Modine’s business processes.

II. SCOPE

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

III. POLICY STATEMENT

A. Export Compliance

- All exports are to be accurately declared to the relevant officials of the export country, if applicable, under the laws of the export country;
- Shipping documentation shall accurately describe item(s) being shipped as well as the export classification and authorization, if applicable; and
- Modine shall have proper authorization to export or re-export items or technology controlled by government regulations, including the International Trade in Arms Regulations (a/k/a the ITAR) and the Export Administration Regulations (a/k/a the EAR) in the United States. Such exports or re-exports may include intra-company and/or intra-country technology transfers to foreign persons - even if they are Modine employees.

B. Import Compliance

- All imports are to be accurately described to the relevant officials of the import country, if applicable, under the laws of the import country;
- All Customs entries shall accurately state all required information, including the importer of record’s name and address, importer number, quantity, value, classification, duty preference eligibility, and country of origin for the imported items; and
- Modine shall have proper authorization to import items or technology controlled by government regulations.

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C. Sanctions Compliance

Modine shall not participate in transactions in which the destination, end-use, or end-user is subject to a sanctions program, including, but not limited to, those programs maintained by United States' Office of Foreign Assets Control (a/k/a OFAC).

D. Anti-Boycott Compliance

- Any requests received by a Modine employee to support a trade boycott of any country are to be reported to the Modine Business Ethics Committee (the "Ethics Committee"), in accordance with the Reporting and Investigation policy; and
- The Ethics Committee shall assess whether any such requests to participate in a boycott could violate applicable anti-boycott regulations or otherwise could negatively impact Modine.
- Modine shall not participate in any trade boycott without the prior written approval of the Ethics Committee.

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 trade compliance. Management serves as role model for supporting these principles and is responsible for monitoring the level of compliance with this policy within the area of their responsibility.