		Global Policy		
Title:	Reporting and Investigation		Responsible Party: Director, Global Compliance & Ethics Programs	
Next Review Date:	October 2020	Last Review Date:	October 2018	Page 1 of 3

I. PURPOSE

As described in our Code of Conduct (“Code”), Modine is committed to the highest standards of moral and ethical behavior by its employees, suppliers, customers and partners. This policy is established to provide worldwide, consistent methods for employees and others to report any matters they believe may violate our Code or legal obligations, and for the investigation and resolution of all such reports.

II. SCOPE

This policy applies to all reports that are made through any of the channels listed in Section III and that relate to any alleged violation of our Code or legal obligations. This policy is limited in scope to reports that relate to an alleged violation of our Code or legal obligations (“Reports”). While it is acceptable for individuals with other concerns to utilize any of the communication channels identified below, it is the Company’s expectation that individuals will report those other concerns primarily to a member of their immediate management or an HR representative for resolution.


III. POLICY STATEMENT

All employees, customers, suppliers, and other interested parties are strongly encouraged to provide any Reports immediately, through any of the communication channels listed below. It is expected that a member of Modine’s management will promptly provide any Reports to the Modine Business Ethics Committee (the “Ethics Committee”). Upon receipt of such reports Modine will promptly and thoroughly investigate and resolve such reports in accordance with this Policy.

A. Communication Channels

Reports should be made to any of the following:

- An employee’s immediate supervisor or that supervisor’s supervisor
- The Employee’s Plant Manager
- Any Human Resources Manager
- Director, Global Compliance & Ethics Programs
- Director of Internal Audit
- General Counsel
- Chief Executive Officer
- Chief Financial Officer
- Ethics Helpline –
 - toll free (888 779-8055) (US/Canada only, international callers please reference dialing instructions for local access number)
 - To make a report online: www.ethicspoint.com.
- The Ethics Committee by mail or by email ethicscommittee@na.modine.com .

		Global Policy		
Title:	Reporting and Investigation	Responsible Party: Director, Global Compliance & Ethics Programs		
Next Review Date:	October 2020	Last Review Date:	October 2018	Page 2 of 3

To contact the Business Ethics Committee directly by mail:

Modine Business Ethics Committee
 C/o General Counsel
 1500 Dekoven Avenue
 Racine, Wisconsin USA 53403-2552.

B. Reporting

Anyone who discovers or suspects activity or omission that violates our values or legal obligations may remain anonymous. However, investigations typically are more successful when the Ethics Committee can communicate with the person reporting the matter of concern.

Any person making a “Report” should:


- not contact the suspected individual in an effort to determine facts or demand restitution; or
- treat the Report with as much discretion as reasonably possible, including avoiding discussions of the case, facts, suspicions, or allegations with anyone not listed as part of the communication channels, above, unless specifically asked to do so by the individuals responsible for the investigation. It is critical we respect the privacy of all during the course of an investigation.

The Company will handle all reported matters in a discreet manner.

THERE WILL BE NO RETALIATION AGAINST ANY PERSON REPORTING, IN GOOD FAITH, A SUSPECTED VIOLATION OF MODINE’S VALUES OR LEGAL OBLIGATIONS.

C. Investigation Responsibilities

- *The Ethics Committee* has the primary responsibility for the investigation of all Reports. The Ethics Committee may satisfy this responsibility with the assistance of the Director, Global Compliance and Ethics Programs, the Director of Internal Audit, the Company’s Human Resources Department, the Company’s Legal Department, and/or outside resources as needed.
- *All employees* are expected to cooperate fully and communicate truthfully. While those conducting an investigation will be as discrete as reasonably necessary, absolute confidentiality is not promised. All employees are expected to assist in preserving the Company’s attorney-client privilege.

		Global Policy		
Title:	Reporting and Investigation	Responsible Party: Director, Global Compliance & Ethics Programs		
Next Review Date:	October 2020	Last Review Date:	October 2018	Page 3 of 3

D. Resolution

If the investigation substantiates a violation of our values or legal obligations occurred, the Ethics Committee will issue a report to appropriate Modine executives and, if appropriate, to the Board of Directors, through the Audit Committee. Such report shall include one or more recommended course(s) of action, with final decisions to be made in consultation with legal counsel, senior management and/or the Board of Directors or a Committee thereof.

- Any officer, director or employee found to have violated our values and/or legal obligations will be subject to appropriate discipline, up to and including termination.
- In the event a 3rd party (such as a supplier or customer) is found to have violated our values or our legal obligations, Modine may alter its relationship with that 3rd party as appropriate, including a potential termination of its relationship with such 3rd Party.
- Decisions to prosecute or refer the examination results to the appropriate law enforcement and/or regulatory agencies for independent investigation will be made as appropriate with legal counsel, senior management and/or the Board of Directors or a Committee thereof.

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 the level of compliance with this policy within the area of their responsibility.