

		Global Policy		
Title:	Positive Work Environment		Responsible Party: Vice President Human Resources	
Next Review Date:	October, 2020	Last Review Date:	October, 2018	Page 1 of 3

I. PURPOSE

Modine Manufacturing Company is committed to be an employer of choice in the communities around the world in which we operate. Maintaining a work environment that is respectful, fair, and safe for our employees is a key element of this commitment. In alignment with our company's core values, the following policy statements have been developed in support of maintaining a **Positive Work Environment** at each of our global locations. All local policies and procedures on related topics should align with, and support, this global policy.

II. SCOPE

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

III. POLICY STATEMENT

A. Equal Opportunities

It is the policy of Modine to offer equal employment opportunity to all qualified employees and applicants, regardless of race, color, religion, national origin, gender, sexual orientation, age, disability, gender identity, marital status, veteran status, citizenship or other protected characteristics. Our employment decisions will be based on business reasons, such as qualifications, talents and achievements and will comply with all local and national employment laws.

B. Equal Pay for Work of Equal Value

The employment policies and practices of Modine prohibit unlawful discriminatory actions taken in regard to rates of pay, opportunities for advancement (including training, promotion and transfer) and all other terms or conditions of employment. In addition, the policies and practices regarding employee classification and the payment of wages/salary at our global locations will comply with the statutory requirements established by local wage and hour laws at that location.

C. Equal Opportunities within a Global Company

Modine is a global company and supports employees willing to accept assignments in foreign Modine locations as required by our business needs. We facilitate the transfer of our employees and their families in a manner that allows them a safe and positive assignment in the foreign country.

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D. Non-Violent Working Environment

Modine requires a working environment free of threats or acts of physical violence against other employees, vendors, customers, visitors, or Company property. This includes behavior outside of the workplace, such as on business travel or at work-related meetings or social functions. It is explicitly against our policy to bring weapons onto Company property or to any Company functions, except as explicitly permitted in other written company policies in accordance with local laws.

E. Respect for Individual Differences

Modine recognizes that individual differences bring unique and valuable perspectives to our company, and strives to maintain an inclusive and collaborative work environment in support of these differences. The company is committed to recognizing and respecting these differences and expects the same treatment among employees. Any inappropriate or discriminating conduct, whether verbal, physical, or visual, that is based upon an individual's race, color, religion, national origin, gender, sexual orientation, age, disability, gender identity, marital status, veteran status, citizenship or other protected group status will not be tolerated by Modine.

F. Anti-Harassment / Anti-Bullying

Modine requires a working environment free of harassing or bullying behavior by our employees, vendors, customers, visitors. This includes behavior outside of the workplace, such as on business travel or at work-related meetings or social functions.

Harassing or bullying behavior is a serious, severe or pervasive behavior that is unwanted or offensive and has the purpose or effect of creating an intimidating, hostile, threatening, or offensive work environment. Harassment of any kind, including that based upon an individual's race, color, religion, national origin, gender, sexual orientation, age, disability, gender identity, marital status, veteran status, citizenship or other protected group status will not be tolerated at Modine.

G. Combating Trafficking in Persons

Modine strictly prohibits the trafficking of persons, the use of forced labor, or the procuring of commercial sex acts. 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, Modine will immediately disclose to the contracting officer and agency Inspector General

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(IG) 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.

H. Safe and Healthy Working Environment

Modine is committed to continuous safety improvement resulting in the prevention of injuries and illnesses and the establishment of safe and healthy working conditions.

Modine will insure a working environment free of drugs. No employee shall be engaged in the illegal use of drugs on or off the job. No employee shall report to work under the influence of or impaired by alcohol or any other substance that could prevent the employee from conducting work activities safely and effectively.

IV. COMPLIANCE RESPONSIBILITY

All employees are responsible for supporting the principles contained in this policy and working with fellow employees to continually ensure 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. Employees who are found to have violated this policy are subject to disciplinary actions commensurate with such violations.