



Policy Regarding Conflict Minerals

Background

Modine Manufacturing Company (“Modine”) is a global company specializing in thermal management systems and components with a long history of and a strong commitment to operating with the highest ethical standards. Modine’s Code of Conduct and Business Ethics (accessible at www.modine.com) (the “Code”) sets forth our guiding ethical principles and reflects our shared commitment to honesty, integrity, transparency and accountability. The Code applies to all directors, employees and anyone else associated with or doing business on behalf of Modine, including Modine’s subsidiaries and affiliates.

Modine is committed to sourcing components and materials from suppliers that share the values expressed in our Code, which includes the respect of human rights. We have established a conflict minerals compliance program that is designed to follow the framework established by the Organisation for Economic Cooperation and Development (OECD).

In July 2010, the United States passed the Dodd-Frank Wall Street Reform and Consumer Protection Act. Part of that law requires all U.S. public companies to make certain disclosures regarding their purchase and use of so-called “Conflict Minerals” (Tin, Tantalum, Tungsten and Gold). The intent of the Act is to draw attention to the use of minerals mined in the Democratic Republic of Congo or adjoining regions, which directly or indirectly benefit armed groups that are responsible for severe human rights violations, and encourage U.S. companies to cease any use of Conflict Minerals originating from this region. Other countries are considering similar action.

Supplier Requirements

In order to assist Modine in its efforts to comply with the requirements and spirit of this Act, Modine expects the following of all of its suppliers across the globe:

- To commit to being or becoming “conflict free” by sourcing Tin, Tantalum, Tungsten and Gold from conflict-free smelters only.
- In support of this conflict free declaration, to obtain declarations and evidence from all sub-suppliers in your supply chain and be prepared to share this evidence upon request from Modine.
- To complete a Conflict Mineral Reporting Template (CMRT) declaration certifying the supplier’s conflict-free status and provide supporting documentation regarding the countries of origin of any tin, tantalum, tungsten and gold that you purchase for Modine. The latest version of the industry standard CMRT can be found at www.conflictreesourcing.org.
- To cooperate with Assent Compliance, the partner Modine has selected for supplier Conflict Mineral reporting for the 2016 calendar year. Assent Compliance will contact suppliers with details on the reporting process and training resources available to support your reporting.

Suppliers that fail to comply with these requirements may be subject to new business hold.

Additional Information and Resources

Additional information on Modine’s conflict minerals program can be obtained at <http://www.modine.com/web/en/supplier-policies.htm> or by contacting conflictminerals@na.modine.com.

Information on the Conflict Minerals Rules can be obtained at <http://www.sec.gov/rules/final/2012/34-67716.pdf>