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Title:	Trade Compliance		Responsible Party: Trade Compliance Counsel	
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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, civil and criminal penalties, 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. Modine’s contracted parties shall comply with all applicable law regarding export, import, sanction, anti-boycott compliance.

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;
- Modine will maintain relevant export documentation as appropriate;
- All exports shall comply with all applicable laws and regulations;
- Any applicable export taxes shall be paid; 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, relevant EU laws and regulations, and any applicable local government laws and regulations. Exports or re-exports that require authorization may include intra-company and/or intra-country technology transfers to foreign persons - even if they are Modine employees.

B. Import Compliance

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- 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;
- Modine will maintain relevant import documentation as appropriate;
- All imports shall comply with all applicable laws and regulations;
- Modine shall make any necessary post-entry adjustments; and
- Modine shall make any appropriate duty and import tax payment, including any Anti-Dumping (ADD) and Counter-vailing Duties (CVD).
- Modine shall have proper authorization to import items or technology controlled by government regulations.

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), nor in transactions which involve forced labor; and
- Following standard company procedures, Modine will screen relevant business parties against sanctions lists.

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;
- 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; and
- Modine shall not participate in any trade boycott without the prior written approval of the Ethics Committee.

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E. Training

Modine will train relevant employees on the subjects above as appropriate.

F. Audit

Modine will audit compliance with the above as appropriate.

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.