

## Product Compliance Statement

Dear Business Partner,

Modine's actions and decisions are driven by our purpose: engineering a cleaner, healthier world. Our strategic journey requires a unifying force that grounds us, inspires us and energizes us as we address the world's most important challenges through innovative products and services with superior quality and performance.

As a producer of products used in most major global markets, Modine is subject to numerous technical regulations and standards. Our commitment to customers is to provide products that comply with safety, environmental and technical regulatory requirements.

In light of the above, as an European legal entity, Modine CIS Italy Srl manufactures its products in accordance to the requirements of the following regulations (where applicable and among others also agreed on a case-by-case basis).

Modine's customer base has an high focus on REACH Regulation:

- it requires the identification of Substances of Very High Concern (SVHC) contained in articles above the threshold 0.1% w/w or the Annex XVII restricted substance thresholds that are manufactured and marketed in the EU (Legal Reference EC 1907/2006);
- SCIP submission under the EU Waste Framework Directive (WFD) (2018/851): Companies supplying products containing REACH SVHC on the EU market are required to submit additional product and SVHC information to the European Chemical Agency, regardless of manufacturing origin;

and further attention is given by Modine to the following requirements:

- EU RoHS 10 Substances Amendment Directive (EU) 2015/863: (Legal Reference Directive 2011/65/EU and (EU) 2015/863);
- Regulation (EU) 2019/1021 on Persistent Organic Pollutant (POP);
- Toxic Substances Control Act (TSCA);
- California's Safe Drinking Water and Toxic Enforcement Act of 1986 (California Proposition 65/Cal Prop 65); Regulation (EU) 2017/821 on Conflict Minerals (established supply chain due diligence obligations for tin, tantalum, tungsten, their ores, and gold from conflict and high-risk areas)/ Dodd-Frank Wall Street Reform and Consumer Protection Act;
- Regulation (EU) No 528/2012 on Biocidal Products (Regulation on the making available on the market and use of Biocidal Products)
- EU Critical Raw Materials (CMR) - As of 2020, the European Commission has identified 30 substances as Critical Raw Materials;
- Precious Metals (Rhodium, Platinum, Gold, Palladium, Iridium, Osmium, Rhenium, Ruthenium, Germanium, Beryllium, Silver, Indium, Gallium, Tellurium, Bismuth, Mercury);
- Rare Earth Elements (REE) (Scandium, Yttrium, Lanthanum, Cerium, Praseodymium, Neodymium, Promethium, Samarium, Europium, Gadolinium, Terbium, Dysprosium, Holmium, Erbium, Thulium, Ytterbium, Lutetium);



- France Anti-Waste for a Circular Economy law (AGEC), Decree 2022-748;
- Nano-particles (or nanomaterials) declaration of the presence;
- PFAS (Per- and polyfluoroalkyl substances) propositions of restriction or mitigation on the use.

Full Material Disclosures (“FMD”) are elaborated and available through CDX tool (Compliance Data Exchange Software). Specific requests about the use of the CDX tool or product’s technical compliance can be submitted to: [regulatorycompliance-pocet@modine.com](mailto:regulatorycompliance-pocet@modine.com).

Modine's Management System considers various international standards, and the following are implemented:

- Quality management system - ISO 9001:2015 (Amaro, Pocenia, San Vito al Tagliamento and Torreglia plants);
- Environmental management system - ISO 14001:2015 (Amaro, Pocenia, San Vito al Tagliamento and Torreglia plants);
- Energy management system - ISO 50001:2018 (Amaro, Pocenia, San Vito al Tagliamento and Torreglia plants);
- Occupational Health and Safety management systems - ISO 45001:2023 (Amaro, Pocenia, San Vito al Tagliamento and Torreglia plants).

Modine is currently working on obtaining the Gender Equality certification in accordance to UNI/PdR 125:2022.

In addition to the above, Modine is actively promoting environmental sustainability and implementing solutions to reduce carbon emissions; among other activities, we have obtained the Bronze level as per Ecovadis Sustainability Assessment.

We recognize our responsibility to help protect the planet and we are strongly committed to minimizing the impact our products have on the environment. Modine is already working with its business partners like suppliers, customers and other stakeholders to reduce its environmental footprint. Please visit our website to acknowledge our Code of Conduct, Company Policies and Sustainability Report, and feel free to contact [sustainability@modine.com](mailto:sustainability@modine.com) for comments or questions regarding this report.

Pocenia, April 24<sup>th</sup>, 2025

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