

	CORPORATE POLICY
	Rev: D
Policy Title: Political Contributions	Effective Date: March 22, 2024
	Function: Legal, Compliance and Corporate Development
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1.0 OVERVIEW

The purpose of this Political Contributions policy (this “Policy”) is to ensure that all political donations, lobbying and civic activity made or conducted by or on behalf of ITT Inc. (“ITT” or the “Company”) within the United States are consistent with all applicable federal, state and local laws and with corporate political accountability and transparency standards. This Policy sets forth the key principles and practices applicable to ITT.

2.0 SCOPE

This Policy applies to all employees of ITT, its subsidiaries and divisions within the United States.

3.0 ROLES & RESPONSIBILITIES

ITT’s Nominating and Governance Committee (the “N&G Committee”) is responsible for the approval and oversight of this Policy and will review any related disclosures on an annual basis. ITT’s Vice President and Deputy General Counsel (the “Deputy General Counsel”) is responsible for ensuring the implementation of, and overall compliance with this Policy within ITT with the support of the General Counsels for the Industrial Process and Connect and Control Technologies Value Centers. The Deputy General Counsel will be responsible for any necessary disclosures under this Policy and will work with the Company’s Communications team to update such disclosures on ITT’s website.

4.0 POLICY

4.1 *Political Contributions*



ITT employees are prohibited from using corporate funds to make contributions to political parties, political action committees, or candidates for state, local, or federal office. ITT employees are also prohibited from making any contributions from corporate funds to organizations classified under the Internal Revenue Code as Section 527 entities, to any ballot initiatives, or for independent political expenditures, including electioneering communications. In addition, ITT will not maintain its own employee-funded political action committee.

The Company generally refrains from contributing to Internal Revenue Code Section 501(c)(4) organizations and employees are prohibited from using corporate funds to contribute to such organizations without a proper business purpose and will not make payments to support any political agenda or activities of such organizations, if any. The Company will disclose any exceptions hereto on an annual basis.

ITT actively supports corporate citizenship initiatives in communities and encourages employees to be active in civic and community activities, including participation in the political and democratic process. However, employees may only do so in their own name and on their own personal time, unless participating in a Company-approved grassroots initiative or unless ITT is specifically permitted by law to participate, and the employee(s) has obtained advance approval from ITT's General Counsel or ITT's Vice President and Deputy General Counsel.

4.2 *Trade Associations*

ITT may pay membership fees and make other contributions (e.g., for conferences and trainings), including on behalf of its employees, to certain U.S. trade associations organized under Section 501(c)(6) of the Internal Revenue Code ("Trade Associations"). ITT will pay membership fees only to Trade Associations that management has determined are meaningful to ITT's business and its employees' professional development and not to support any political agenda or activities of such Trade Associations, if any. Each year, the Deputy General Counsel will be responsible for creating a list of Trade Associations to which ITT pays membership dues in excess of \$25,000 annually and the amount of ITT's contributions that each such Trade Association estimates are used for non-deductible purposes, and will work with the Company's Communications team to update such disclosures on ITT's website.

ITT's participation with such Trade Associations does not mean the Company endorses such Trade Association's entire agenda or the views of its leaders or other members.

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4.3 *Lobbying*

From time to time, ITT may engage in discussions with all levels of governments on particular public policy issues. When ITT determines it is in the best interest of the Company, ITT may work with governments to provide information and perspective that supports ITT’s point of view through lobbyist and grassroots communications.

All lobbying efforts or activities that resemble lobbying on behalf of ITT must be approved in advance by ITT’s General Counsel or ITT’s Vice President and Deputy General Counsel.

4.4 *Governance*

Any material amendments to this Policy will require the approval of the N&G Committee.

Exceptions to this Policy may be granted by ITT’s Chief Executive Officer or General Counsel upon a determination that the use of corporate resources for political purposes will promote the interests of the Company and align with ITT’s policies and values without regard for the private political preferences of members of management. If ITT does make political contributions, the Company’s Deputy General Counsel will be responsible for creating a list of contributions and ensuring disclosure on ITT’s website.