

	CORPORATE POLICY
	Rev: C
Policy Title: <p style="text-align: center;">Conflict Mineral Policy</p>	Effective Date: January 30, 2023 Function: <p style="text-align: center;">Legal, Compliance & Corporate Development</p>
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1.0 OVERVIEW

1.1 PURPOSE

This Conflict Mineral Policy establishes the position of ITT Inc. and its wholly-owned subsidiaries and affiliates it controls (together, "ITT") related to Conflict Minerals: ITT will not knowingly manufacture products with raw materials or components containing tin, tungsten, tantalum and/or gold ("3TG") that finance certain Armed Groups involved in the conflict in the Democratic Republic of Congo ("DRC") and Adjoining Countries (the "DRC Region").

This Conflict Mineral Policy also creates the governance framework for:

- a. Complying with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (the "Dodd-Frank Act"), and the Conflict Minerals Final Regulations adopted by the U.S. Securities and Exchange Commission ("SEC") on August 22, 2012 ("CM Regulations"), and
- b. Assisting ITT customers in meeting their own compliance obligations under the Dodd-Frank Act and the CM Regulations by providing information about the 3TG content and supply chain sourcing for ITT Products.

1.2 SCOPE

The Dodd-Frank Act and CM Regulations require U.S. publicly traded companies to disclose in SEC filings which products they manufacture or contract to manufacture each year that contain certain minerals that are financing conflict in the DRC or an Adjoining Country as further defined in the law and regulations.

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ITT is a registrant that files reports with the SEC under Sections 13(a) (15 U.S.C. 78m(a)) or 15(d) (15 U.S.C. 78o(d)) of the Securities Exchange Act of 1934, as amended.

1.3 KEY TERMS

Adjoining Country. The term Adjoining Country means a country that shares an internationally recognized border with the DRC, presently including Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

Armed Group. The term Armed Group means an armed group that is identified as a perpetrator of serious human rights abuses in annual Country Reports on Human Rights Practices under sections 116(d) and 502B(b) of the Foreign Assistance Act of 1961 (22 U.S.C. 2151n(d) and 2304(b)) relating to the DRC or an Adjoining Country.

Conflict Minerals. The term Conflict Minerals means:

(i) Columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, which are limited to tin, tungsten and tantalum, unless the U.S. Secretary of State determines that additional derivatives are financing conflict in the DRC or an Adjoining Country; or

(ii) Any other mineral or its derivatives determined by the U.S. Secretary of State to be financing conflict in the DRC or an Adjoining Country.

ITT Products. The term means products manufactured by ITT or contracted to be manufactured by ITT.

RCOI. The term RCOI means a reasonable country of origin inquiry.

2.0 POLICY STATEMENT

ITT, along with governments, non-governmental organizations, the investment community and other corporations, is concerned with potential human rights violations, such as forced labor, human trafficking, child labor and the role armed conflicts may play in such violations in the countries in which we do business. As such we are committed to complying with the requirements of the Dodd-Frank Act and the CM Regulations. ITT will not knowingly manufacture products with raw materials or components containing 3TG that finance Armed Groups involved in the conflict in the DRC Region.

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Due to the complexities of the mining process and because ITT does not purchase conflict minerals directly from smelters or mines, we must rely on sourcing information provided by our suppliers. If, during a RCOI, a supplier provides information to ITT that it has supplied 3TG from an uncertified smelter in the DRC Region to us, ITT will take commercially reasonable steps to ensure that the supplier has changed its sourcing, or ITT will look for an alternative supplier.

3.0 INTERNALLY CONSISTENT POSITIONING

Reflecting the values embodied in our Code of Conduct, our Supplier Expectation Protocols, and our Human Rights policy, ITT affirms our on-going commitment to avoid the knowing use of Conflict Minerals that directly or indirectly finance or benefit Armed Groups in the DRC region.

ITT also supports industry-wide approaches to this problem, including the Responsible Minerals Assurance Process and other initiatives.

In accordance with our Anti-Corruption Policy, ITT will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.

4.0 ROLES & RESPONSIBILITIES

Because 3TG are necessary to the functionality or production of certain ITT Products, ITT shall:

- a. determine which ITT Products contain 3TG,
- b. conduct RCOI and appropriate supply chain due diligence to determine if the ITT Products containing 3TG contain Conflict Minerals,
- c. annually file a report on Form SD with the SEC disclosing that information and post the Conflict Minerals Report on www.itt.com, and
- d. provide such information about ITT Products upon written request from customers.

In furtherance thereof ITT’s responsibilities, each of ITT’s Value Centers will be responsible for:

- a. identifying ITT Products that may contain 3TG,
- b. communicating with suppliers to confirm 3TG content and make RCOIs,

- c. performing appropriate due diligence about the sources of 3TG in raw materials and/or components purchased by ITT, and
- d. responding timely to internal and external (e.g., customer) requests for Conflict Minerals' certifications

ITT expects that our suppliers will be responsible for:

- a. complying with ITT's requests for information in a timely fashion,
- b. providing certifications where possible,
- c. assisting ITT in performing RCOIs, and
- d. conducting appropriate due diligence about the sources of 3TG in the raw materials and/or components supplied to ITT and contained in ITT Products.

5.0 SUPPORTING DOCUMENTS

Title
Human Rights Policy
Anti-Corruption Policy
Supplier Expectation Protocols

6.0 SUPERSEDED DOCUMENTS

Document Number & Revision	Title

7.0 CHANGE LOG

Document all modifications to this policy in DESCENDING order (most recent to oldest), and include when policy was initially released and expired.

Date	Rev	Change Made	Reason	Name
1/30/23	C	Revisions to reflect current practice	Periodic Review	T. Okasha
8/31/16	B	Minor Revisions	Policy Optimization Project	D. Bagatta
6/2/14	A	Updated text	Conform to Form SD	J. Lenzi