

	<b>CORPORATE POLICY</b>
	Rev: E
Policy Title:  <p style="text-align: center;"><b>Human Rights Policy</b></p>	Effective Date: <b>July 31, 2017</b>  Function:  <p style="text-align: center;"><b>Human Resources</b></p>
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## 1.0 OVERVIEW

Human rights are the standards of treatment to which all people are entitled, and ITT Inc. (together with its subsidiaries "ITT") is committed to identifying, preventing and addressing actual or potential negative human rights impacts within our sphere of influence.

Although human rights are principally the responsibility of national governments, human rights have become increasingly important for global businesses. Wherever ITT operates, we fully support and adhere to the principles of the Universal Declaration of Human Rights, the United Nations Global Compact and the International Labour Office International Labour Standards.

ITT shall serve as a positive influence in the communities in which we operate, demonstrating by our actions our belief that human rights violations are both avoidable and unacceptable. ITT will work to identify and do business with supply chain partners who aspire to conduct their business in a similar manner.

## 2.0 SCOPE

This ITT Human Rights Policy (this "Policy") is intended to operate in conjunction with ITT's Purpose and Principles, other ITT corporate policies, and the ITT Code of Conduct.

This Policy applies to all ITT employees and supply chain partners within ITT's sphere of influence around the world.

## 3.0 ROLES & RESPONSIBILITIES

ITT has long addressed our belief in human rights, dignity, and fairness in our employment practices, non-discrimination policies, minimum age requirements, fair compensation policies, and our policies on health, safety and security of our employees and our facilities.

ITT supports, respects, and will comply with local laws and regulations in all locations where we do business. We respect the sovereignty of governments throughout the world and the responsibility of such governments to protect the rights, welfare and health of their citizens; however, we expect our employees to abide by both the letter and spirit of ITT's Purpose and Principles, ITT's Code of Conduct and ITT's policies and processes in their

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dealings worldwide, which in some cases may be above and beyond what is required by local laws and regulations.

#### 4.0 KEY TERMS

**United Nations Global Compact:** a strategic policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labor, environment and anti-corruption.

**Universal Declaration of Human Rights:** a declaration adopted by the United Nations General Assembly on 10 December 1948, comprising 30 articles that outline a comprehensive perspective of human rights.

**International Labour Office International Labour Standards:** a system of labour standards aimed at promoting opportunities for women and men to obtain decent and productive work in conditions of freedom, equality, security and dignity.

**Good Faith** – Concerns submitted with an absence of malice or malicious intent; in the belief that a violation may be occurring.

#### 5.0 POLICY

##### 5.1 Human Rights

ITT is committed to conducting our business in a manner that respects and advances human rights based on the United Nations Global Compact, the Universal Declaration of Human Rights and the International Labour Office International Labour Standards that our values and operating principles directly support.

ITT will not willingly or knowingly assist in any violation of human rights, nor benefit from human rights abuses committed by another party, nor remain silent when human rights violations are being committed.

##### 5.2 Labor

ITT is committed to the freedom of association and the recognition of the right to collective bargaining provided by law.

ITT is committed to the elimination of all forms of forced and compulsory labor including but not limited to prison and bonded labor.

ITT is committed to the strict prohibition of human trafficking and effective abolition of child labor.

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ITT is committed to providing safe and secure working conditions for employees, contractors, and all others working on ITT's behalf.

ITT is committed to complying with all applicable wage and hour laws.

ITT is committed to the elimination of discrimination with respect to employment and occupation, including not making employment-related decisions based on any characteristics protected by applicable law, such as age, color, gender, gender identity, national origin, physical or mental disability, race, religion, sexual orientation or any other legally protected personal basis.

**5.3 Raising Concerns**

In order to identify, prevent and address actual or suspected human rights violations within our sphere of influence, any and all persons are requested to report such concerns through various processes which ITT makes available, including an anonymous external reporting system, as outlined in the Code of Conduct, and in the ITT Speaking Up Policy.

All persons who wish to report suspected human rights violations in Good Faith, can do so anonymously and confidentially, to the extent permitted by national law, and will be protected from retaliation as outlined in the ITT Code of Conduct.

Furthermore, ITT will investigate all reported issues and will take appropriate action against any employee who violates the human rights of others.

**6.0 RULES FOR GOVERNMENT CONTRACTS AND SUBCONTRACTS**

**6.1 Background**

ITT performs U.S. government prime contracts and subcontracts on a regular basis. Such government agreements are generally subject to Federal Acquisition Regulation ("FAR") clause 52.222-50, Combating Trafficking in Persons, which specifies specific, government contractor-unique requirements implementing the U.S. government's policy against human trafficking. This Section 6 identifies these requirements, which ITT has determined shall apply to ITT's performance of all U.S. government contracts and subcontracts.

**6.2 Additional Definitions (Applicable to Section 6 Only)**

"agent" means any individual, including a director, officer, employee, or independent contractor, authorized to act on behalf of ITT.

“**coercion**” means (1) threats of serious harm to or physical restraint against any person, (2) any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person, or (3) the abuse or threatened abuse of the legal process.

“**commercial sex act**” means any sex act on account of which anything of value is given to or received by any person.

“**debt bondage**” means the status or condition of a debtor arising from a pledge by the debtor of his or her personal services or of those of a person under his or her control as a security for debt, if the value of those services as reasonably assessed is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited and defined.

“**employee**” means an ITT employee directly engaged in the performance of work under a U.S. Government contract or subcontract who has other than a minimal impact or involvement in contract performance.

“**forced Labor**” means knowingly providing or obtaining the labor or services of a person (1) by threats of serious harm to, or physical restraint against, that person or another person, (2) by means of any scheme, plan, or pattern intended to cause the person to believe that, if the person did not perform such labor or services, that person or another person would suffer serious harm or physical restraint; or, (3) by means of the abuse or threatened abuse of law or the legal process.

“**involuntary servitude**” includes a condition of servitude induced by means of (1) any scheme, plan, or pattern intended to cause a person to believe that, if the person did not enter into or continue in such conditions, that person or another person would suffer serious harm or physical restraint, or (2) the abuse or threatened abuse of the legal process.

“**severe forms of trafficking in persons**” means (1) sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age, or (2) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

“**sex trafficking**” means the recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act.

**6.3 Additional Policy Requirements for ITT U.S. Government Contracts**

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The U.S. government has adopted a policy prohibiting trafficking in persons by its contractors, contractor employees, and their agents. In accordance with this U.S. government policy, ITT, its employees and agents shall not:

- (1) engage in severe forms of trafficking in persons during the period of performance of a U.S. Government contracts or subcontracts;
- (2) procure commercial sex acts during the period of performance of any U.S. Government contract or subcontract;
- (3) use forced labor in the performance of a U.S. Government contract or subcontract;
- (4) destroy, conceal, confiscate, or otherwise deny access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- (5)(i) use misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work; (ii) use recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- (6) charge employees recruitment fees;
- (7)(i) fail to provide return transportation or pay for the cost of return transportation upon the end of employment— (A) for an employee who is not a national of the country in which the work is taking place and who was brought into that country for the purpose of working on a U.S. Government contract or subcontract (for portions of contracts performed outside the United States); or (B) for an employee who is not a U.S. national and who was brought into the U.S. for the purpose of working on a U.S. Government contract or subcontract, if the payment of such costs is required under existing temporary worker programs or pursuant to a written agreement with the employee (for portions of contracts performed inside the U.S.), except that

(ii) the requirements of the foregoing paragraph(7)(i) shall not apply to an employee who is—(A) legally permitted to remain in the country of employment and who chooses to do so; or (B) exempted by an authorized official of the contracting agency from the requirement to provide return transportation or pay for the cost of return transportation;

(iii) the requirements of the foregoing paragraph (7)(i) are modified for a victim of trafficking in persons who is seeking victim services or legal redress in the country of employment, or for a witness in an enforcement action related to trafficking in persons. ITT shall provide the return transportation or pay the cost of return transportation in a way that does not obstruct the victim services, legal redress, or witness activity. For example, ITT shall not only offer return transportation to a witness at a time when the witness is still needed to testify. This paragraph does not apply when the exemptions at the foregoing paragraph (7)(ii) of this clause apply.

(8) Provide or arrange housing that fails to meet the host country housing and safety standards; or

(9) If required by law or contract, fail to provide an employment contract, recruitment agreement, or other required work document in writing. Such written work document shall be in a language the employee understands. If the employee must relocate to perform the work, the work document shall be provided to the employee at least five days prior to the employee relocating. The employee’s work document shall include, but is not limited to, details about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons.

**6.4 Notice to Employees of U.S. Government Policy**

ITT shall notify its employees and agents working on U.S. government contracts and subcontracts of (i) the U.S. government's policy prohibiting trafficking in persons, described in Section 6.3 above; and (ii) the actions that will be taken against employees or agents for violations of this policy. Such actions may include, but are not limited to, removal from the contract, reduction in compensation, or termination of employment.

**6.5 Notice to U.S. Government Of Violations**

ITT shall inform the applicable U.S. Government Contracting Officer and agency Inspector General immediately of -

(i) any credible information it receives from any source (including host country law enforcement) that alleges an ITT employee, subcontractor, subcontractor employee, or their agent has engaged in conduct that violates the policy in Section 6.3 above; and (ii) any actions taken against an ITT employee, subcontractor, subcontractor employee, or their agent pursuant to this clause.

**6.6 Compliance Plan and Annual Certification**

There are additional FAR requirements for a specific compliance plan document and annual certification that the contractor is in compliance with its obligation under FAR 52.222-50. However, because ITT does not have non-COTS contracts over \$500,000 with performance taking place OCONUS, nor does it anticipate entering into these types of contracts, these requirements are not applicable and not further described here. If ITT does enter into a non-COTS contract over \$500,000 with performance to take place OCONUS, which is subject to FAR 52.222-50, then ITT Legal must be notified to complete the requirements of the clause.

**7.0 SUPPORTING DOCUMENTS**

Title
Code of Conduct
Speaking up Policy
Human Rights FAQ

**8.0 SUPERSEDED DOCUMENTS**

Title

**9.0 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
July 31, 2017	E	Added provisions relating to compliance with FAR clause 52.222-50	Update	D. McKinney
August 29, 2016	D	Minor Revisions adding International Labour Standards reference and Good Faith definition.	Update	D. DeMeritt
August 24, 2012	C	Minor Revisions	ITT Spin-off	D. DeMeritt

Date	Rev	Change Made	Reason	Name
Mar 15, 2011	B	Modified section 2.3	More clarity about use of EthicsPoint	T. McDaniel
Feb 25, 2011	A	New Policy		J. Lenzi