

	CORPORATE POLICY
Policy Number: 29-01	Rev: A
Policy Title: Conflict Mineral Policy	Effective Date: June 2, 2014
	Function: Corporate Responsibility
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1.0 OVERVIEW

1.1 PURPOSE

This Conflict Mineral Policy establishes ITT Corporation's (ITT) position related to Conflict Minerals:

- a. 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 adjacent countries (the "DRC Region").

This Conflict Mineral Policy also creates the governance framework for:

- b. 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
- c. 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 Democratic Republic of the Congo 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 US Securities and Exchange Commission under Sections 13(a) (15 U.S.C. 78m(a)) or 15(d) (15 U.S.C. 78o(d)) of the Exchange Act.

Because tin, tungsten tantalum and/or gold (“3TG”) are necessary to the functionality or production of certain products manufactured by ITT or contracted to be manufactured for ITT (“ITT Products”), ITT shall:

- a. determine which ITT Products contain 3TG,
- b. conduct reasonable country of origin inquiries (“RCOI”), and appropriate supply chain due diligence,
- 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.

1.3 ROLES & RESPONSIBILITIES

The ITT internal Conflict Minerals team (Corporate Responsibility, Supply Chain, Operations and Legal) will develop a framework from which to work with our supply chain partners to take reasonable steps to determine whether raw materials and components purchased by ITT contain 3TG sourced by said supply chain partners in a way that would directly or indirectly finance Armed Groups responsible for serious human rights abuses in the DRC or the DRC Region.

Each of ITT’s Value Centers will be responsible for:

- a. working within this corporate Conflict Mineral framework strategy,
- b. identifying ITT Products that may contain 3TG,
- c. communicating with suppliers to confirm 3TG content and make reasonable country of origin inquiries,
- d. performing appropriate due diligence about the sources of 3TG in raw materials and/or components purchased by ITT, and
- e. responding to 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 where possible certifications,
- c. assisting ITT in performing reasonable country of origin inquiries, and

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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.

1.4 KEY TERMS

3TG. The term 3TG means tin, tungsten, tantalum and/or gold.

Adjoining Country. The term Adjoining Country means a country that shares an internationally recognized border with the Democratic Republic of the Congo ("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 Democratic Republic of the Congo 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 Secretary of State determines that additional derivatives are financing conflict in the Democratic Republic of the Congo or an adjoining country; or
- (ii) Any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country.

2.0 POLICY

ITT, along with governments, NGOs, 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 is committed to responding to customer requests for information about the 3TG contents of ITT Products, and assisting ITT customers in complying with their own reporting obligations under the Dodd-Frank Act and the CM Regulations.

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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. ITT expects its business dealings with suppliers and contractors to be based on fairness, honesty, lawfulness, safety, environmental stewardship and social consciousness, including respect for human rights.

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

2.1 Internally Consistent Positioning

Reflecting the values embodied in our Code of Conduct, our Supplier Expectation Protocols, and ITT’s Human Rights policy 22-02, ITT affirms our on-going commitment to avoiding 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 Conflict Free Smelter Program and other initiatives.

In accordance with our Anti-Corruption policy 27-01, 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.

3.0 SUPPORTING DOCUMENTS

Doc Number	Title
22-02	ITT Human Rights Policy

Doc Number	Title

4.0 SUPERSEDED DOCUMENTS

Document Number & Revision	Title

5.0 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
6/2/14	1	Updated text	Conform to Form SD	J. Lenzi