



ITT's Supplier Code of Conduct

Purpose and Applicability

The purpose of ITT's Supplier Code of Conduct is to provide ITT suppliers with clear expectations of conduct across legal, regulatory, company policy and business paradigms. This forms the foundation for cooperation between ITT and its suppliers to envision a work environment all can take pride in; a company others respect and admire, and a world made better by our actions. This



document applies to all ITT businesses worldwide. Please refer to our website [ITT.com](https://www.itt.com) and the list of subsidiaries in Exhibit 21 to the company's most recent 10-K report which is available online at [sec.gov](https://www.sec.gov).

ITT is committed to providing ITT customers with the highest quality products and services; and we view our suppliers as extensions of our company and an essential part of our extended value chain and commitment to quality.



We expect our suppliers to demonstrate strong values and commit to the ethical principles outlined in this Supplier Code of Conduct. We expect our suppliers to comply with the sound business practices we embrace, follow the law and conduct activities in a manner that respects human rights.

ITT's Supplier Code of Conduct applies to all suppliers across the ITT enterprise and it complements all of the other related information provided by ITT. If there are any questions, please contact your ITT buyer.

ITT reserves the right to change ITT's Supplier Code of Conduct at any time and the electronic version posted on [ITT.com](https://www.itt.com) contains the most current and controlling version of this document. ITT also reserves the right to assess ITT suppliers in an effort to better understand their actions, policies and/or procedures which contribute to appropriate performance on several issues herein. Any such ITT supplier assessment will be treated confidentially but may serve as a data point for ITT in deciding to continue a business relationship with a supplier. It is recommended that ITT suppliers speak with their ITT buyers about these principles, or periodically access [ITT.com](https://www.itt.com) for the latest version of ITT's Supplier Code of Conduct.

Normative Reference

This document is to be interpreted in the context of the International Organization for Standardization ISO Standard – ISO9001:2015.

The ITT Code of Conduct

ITT suppliers are expected to behave in a manner consistent with ITT’s Code of Conduct and equally commit to strive to do the right thing always. Under the ITT Code of Conduct, suppliers, their employees & their supply chains are expected to:

- Be truthful.
- Strictly adhere to the letter and spirit of all laws.
- Provide high-quality products and services.
- Conform to locally accepted standards of good corporate citizenship in each country in which we do business.
- Promote and sustain a work environment that fosters mutual respect, openness and individual integrity.
- Be a global citizen by never letting the end justify the means and always living up to our ethical, environmental, and social responsibilities.
- Be committed to play a role to address the challenge of climate change, deliver a sustainable, equitable, low-carbon economy, and provide a healthy future for all.



ITT will periodically review and audit its suppliers to ensure their conformance with ITT’s Supplier Code of Conduct and expects our suppliers’ support when ITT indicates improvement is needed in order to align with our own goals and objectives.

Suppliers can find the latest edition of the ITT Code of Conduct at [Ethics.ITT.com](https://ethics.itt.com).

Inclusion and Diversity

ITT values different ideas, opinions and experiences and is committed to continually advancing a culture of inclusion and diversity within its work force and expects ITT suppliers to be similarly committed to diversity and inclusion.

To maintain an inclusive and diverse work environment, ITT suppliers should take steps to ensure their workplace provides equal employment and advancement opportunities, incentives, and discipline. In so doing, ITT suppliers must commit that they do not make 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.

Harassment

Harassment has no place at ITT, or in our supplier network. Recognizing that legal definitions of “harassment” may differ globally, ITT considers it to include any form of unwelcome conduct toward another person that has the purpose or effect of creating an intimidating, hostile or offensive work environment for that person. Harassing conduct can be committed by an employee or a non-employee and can take many forms, including making gestures or remarks, touching, or displaying pictures. Promises of promotion or special treatment in return for sexual favors also constitutes harassment. ITT will not tolerate any such conduct, regardless of whether a harassment claim is enforceable under local law and expects its suppliers to be so committed.

Ethical Principles & Human Rights

ITT is committed to ensuring we treat the people and communities across our value chain with dignity and respect by identifying, preventing, and addressing any actual or potential human rights risks and impacts.

We strive to ensure our products and services respect internationally recognized human rights standards in our operations and in our value chain. 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 does not tolerate the use of child labor, forced labor, human trafficking, or any other violation of human rights in any form including slave labor, prison labor, indentured servitude, or bonded labor. And we do not tolerate corporal punishment.

To ensure that every facet of our business upholds these standards, ITT is committed to engage suppliers who comply with applicable laws and share the spirit and intent of ITT’s human rights commitment along with their respective supply chains and sub-tier business partners. In particular, we are committed to:

- Providing safe and secure conditions for those working on our company’s behalf
- Protecting the environment
- Following all applicable wage and hour laws
- Strictly prohibiting human trafficking and the use of child or forced labor, including prison or bonded labor
- Treating each other fairly and equitably

ITT’s suppliers must maintain labor, health and safety, environmental and ethics practices that meet or exceed all applicable laws and relevant international norms and standards. We expect our suppliers to comply with any applicable mental, sensory, or physical disability regulations. Our policies also encompass equal opportunity in all phases and all aspects of employment, including selection, hiring, training, compensation, promotion, and transfers and maintaining a zero-tolerance policy for discrimination, harassment, or retaliatory behavior. In addition, we ensure we make available appropriate accommodations

and opportunities to enable equal access for everyone and work to remove barriers to access where challenges or needs exist. We treat all company employees according to fair and responsible employment terms prevalent in the countries in which they are employed.

Our approach to human rights is rooted in actions and governed through the ITT Code of Conduct and our Human Rights Policy. Our approach requires driving industry-wide best practices in human rights, promoting continuous improvement regarding our practices, ensuring stakeholder transparency, and continually evaluating our partnerships with external companies and organizations to ensure they share our strong human rights values.

ITT upholds human rights at all times and in all locations, regardless of local business customs. For further information see ITT's Human Rights policy at [ITT.com](https://www.itt.com).

Prohibition of Corruption and Bribery

ITT does not tolerate any form of bribery or corruption in our business anywhere in the world. We know that they not only harm ITT but also the global marketplace and the communities where we do business.

ITT expects its suppliers to conform with all anti-corruption and anti-bribery laws and regulations, including the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Anti-Bribery Act, as well as the specific provisions of ITT's Code of Conduct prohibiting facilitating payments. Ideally, ITT suppliers shall have a Code of Conduct or company procedures which also prohibit unethical and illegal activity involving bribery and corruption, as well as anti-corruption training programs for their employees.

Conflict – Free Sourcing

ITT has implemented a Conflict Minerals Policy and practice, and our suppliers that manufacture parts, components, or products containing Conflict Minerals should procure those materials from conflict-free sources where it is feasible. We expect our suppliers to adopt, implement and communicate to sub-suppliers their positions and policies regarding Conflict Minerals, and where possible, require their downstream suppliers to adopt and implement similar positions and policies. Suppliers are expected to work with sub-suppliers to trace conflict materials at least to the smelter level and encourage the use of a standard reporting process. ITT reserves the right to request its suppliers to provide further evidence of their conflict mineral supply chain, including down to the mine level. Additional information is available at: [ITT.com/ITT/Media/ITT/ITTSite/About/Conflict-Mineral-Policy.pdf](https://www.itt.com/ITT/Media/ITT/ITTSite/About/Conflict-Mineral-Policy.pdf).

Restrictions on Hazardous Substances

ITT suppliers must agree to comply with:

- The European Union (EU) Directive 2002/95/EC (the "Directive") as amended from time-to-time and any country-specific implementing laws and regulations.
- Any applicable legislation implemented outside the EU covering some or all of the matters covered by the Directive.

Because ITT may sell its products in California, ITT suppliers must disclose in writing to ITT that all materials and components in the materials they provide, and the amounts therein, which require labeling under California Proposition 65 are so labeled.

All shipments must be packaged and labeled according to applicable laws and regulations and include a current Safety Data Sheet.

Product Safety Expectations

ITT suppliers must provide products, components, materials, and services that conform to specifications and are free from product safety hazards that would result in personal injury or death, adverse environmental impacts, and/or property damage. ITT suppliers must further certify that when these purchased items are incorporated into ITT products, they are safe for our customers, employees, the general public and the environment.

International Trade Controls

ITT suppliers are expected to comply with all applicable export/import regulations governing international trade (the export and import of domestic and foreign origin parts and components and related technical data), including the U.S. International Traffic in Arms Regulations (ITAR), the U.S. Export Administration Regulations (EAR), the Office of Foreign Assets Control Regulations (OFAC) and all applicable non-U.S. Government export/import regulations.

ITT suppliers have a responsibility to ensure they comply with trade laws and regulations in any country where they do business. ITT suppliers shall provide complete and accurate information and obtain export licenses and/or authorizations when necessary.

Prohibition on Conflicts of Interest

ITT Suppliers must not engage in activities that create, or even appear to create, conflict between the Supplier's interests and the interests of ITT. ITT employees will not accept gifts, favors or entertainment that have a value greater than we could reasonably reciprocate or that obligate or appear to obligate them to act in any way contrary to the law, ITT business interests or ITT's ethical business practices.

Environmental Responsibility

As part of ITT commitment to sustainability and continually improving our environmental performance, ITT has implemented an Environmental Management System (EMS) at our major manufacturing sites worldwide to comply with the ISO 14001:2015 standard.

ITT expects that all of our suppliers commit to the following:

- Compliance with all applicable laws, regulations, and other legal requirements.

- Refraining from harmful changes to the soil, water and air pollution, harmful noise emissions, and excess water consumption that significantly impair the natural foundations for the cultivation and the production of food, prevent people from accessing safe drinking water, impair or inhibit access to sanitary facilities or are harmful to health.
- Controlling the use of materials and resources (e.g., electricity, fuel, chemicals, paper, etc.) to be both energy and resource efficient.
- Implementing measures to reduce its direct and indirect CO₂e emissions (including in its upstream value chain). This includes, for example, the use of green electricity and the use of secondary materials or biomaterials.
- Participating to provide ITT access to its data in this regard, and to work with ITT to review reasonable methods to improve performance, aligned to ITT's sustainability goals and objectives.
- Ensuring transparency regarding their own emissions as well as those of the upstream supply chains.
- Establishing reduction targets.
- Protecting biodiversity and not contributing to the changing, deforestation, or damage of natural woodland and other natural ecosystems.
- Sustainable agriculture and forestry in their land and forest use.
- Minimizing the production of waste while carrying out any work outside or within ITT premises.
- Proper handling, storage, and disposal of all hazardous and non-hazardous materials.
- Growing the circular economy, qualifying their own n-tier supply chains regarding the provision of secured secondary raw material sources, and to evaluate that secondary raw materials are used to the greatest extent possible, also establishing closed loops for returning recyclable materials into the supplier's own supply chain.
- When supplying products or materials to ITT, minimizing where is feasible or using recyclable packaging, and taking back or reusing the packaging to the extent practical.
- Ensuring that all waste materials are properly handled, stored, and disposed of in an efficient and sensitive manner to avoid any spillage, leakages, or excess air emissions while working on any of ITT premises and appropriate disposal after leaving any of ITT premises.
- Promptly reporting all incidents that may have an environmental impact on any of ITT premises. or involving materials originating in their work for ITT.
- Verifying with their ITT sponsor what potential impacts their operations or tasks may have on ITT sites' environmental aspects.

Accurate Records

ITT suppliers must maintain complete and accurate records of business documentation of all products and services provided to ITT.

All records shall be retained for a period of one year from the date of delivery to ITT or as directed by the ITT site.

Information Protection

ITT suppliers should take proper care to protect information, including confidential, proprietary, and personal information. Information maintained on electronic systems should be protected against cyber intrusions and other un-authorized use or access, through appropriate physical and electronic security procedures. ITT information should not be used for any purposes beyond the scope of the business arrangement with ITT, without prior authorization.

In addition, ITT expects our suppliers to comply with insider trading laws and take steps to prevent their employees from trading in ITT or any other company's securities while in possession of material nonpublic information about such company.

Sub-Tier Suppliers

ITT expects our suppliers to have management systems in place to support compliance with laws, regulations, and expectations related to or addressed expressly within the Supplier Code of Conduct. We encourage our suppliers to implement their own written code of conduct, and to flow down the principles of ITT's supplier Code of Conduct to their value chains that furnish goods and services to the supplier.

Raising Concerns

ITT's Ethics Helpline is available to employees, managers, customers, suppliers, and other business partners. Should a supplier or their employees have questions or concerns about any business-related matter or behavior that may violate applicable laws, regulations, or ITT Code provisions, they are strongly encouraged to raise the matter with their ITT manager or utilize the ITT Ethics Helpline found at ittethicshelpline.ethix360.com. ITT's Ethics helpline is managed by a third party service provider. It is available around the clock, seven days a week, and is internationally accessible. Reports can be made by phone or by submitting an internet form. All reports are confidential and can be submitted anonymously in any of ITT's local languages.



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