



ITT



WHO WE ARE

The ITT Code of Conduct





A MESSAGE FROM LUCA SAVI

Dear ITTers,

Every day, we as ITTers deliver critical components that keep the world safe, moving and smiling. It's what we do. And while what we do is extremely important, how we do it is key, and the "how" is what really defines us. At the core of ITT's "how" is Integrity. It underscores who we are and ultimately describes our culture.

We all know we must act with integrity, set a high bar for ourselves and each other, demand honesty, complete transparency as well as unprecedented accountability in all areas of our business. And we must hold ourselves -- and each other -- accountable if we are to achieve our goals always in the right way.

In this respect, our Code of Conduct is a powerful resource. It guides how we should conduct ourselves every day in our relationships with our suppliers,

customers, shareholders, communities, and one another. Our Code of Conduct goes beyond business guidelines; it's a unifying declaration of our core principles.

Each and every one of us must live by our Code of Conduct while following all applicable laws and policies. Please use our Code of Conduct as your guide to ethical business behavior and always keep in mind: **If you see it, say it and If you're not sure, find out more.**

Thank you for doing the right thing, in the right way, every day.

Sincerely,

Luca Savi

WHY DO WE HAVE A CODE?

Our Code serves as a guide to ethical business conduct and is an element of our higher performance culture, which guides everything we do at ITT. Our Code sets forth the behaviors expected of us, helps us to make ethical decisions and shows us how we can identify potential misconduct. While our Code cannot answer every possible question you might have, it will give you the tools you need to make the right decision and will point you to relevant resources and policies when the right decision might not be clear.

Do the Right Thing Always

Often the right course of action is obvious. However, there will be times when it is not so clear. When that happens, ask yourself these questions:

- **Is it legal?**
- **Would I be comfortable if my manager were made aware of my actions?**
- **Would I want my actions to be made public?**
- **Am I doing what is right for my team members, our customers, suppliers, shareholders and community?**
- **Is it consistent with our Code, policies and principles?**

Answering “yes” to all of these questions means the action is probably acceptable.

Any “no” or “I am not sure” response is a signal to stop, reconsider your actions and ask for guidance.

ITT HIGHER PERFORMANCE CULTURE

Outstanding performance is key to our success. As in a decathlon, ITT's culture is based on performance in 10 areas. These 10 core practices help guide everything we do – how we think, how we act, and how we win.



SERVICE LEADERSHIP

I put others first. I want to be better and help others do better. I am here to serve all stakeholders. It's who I am.

WORK ETHIC & INTEGRITY

There is dignity in my job and in what I do. I am dedicated, and others count on me to get the job done and done right.

GRANULARITY & DATA-BASED DECISION MAKING

I go deep to understand our business and people. This is one way that I show that I care and that I am not superficial.

PASSION FOR RENEWAL

I have the curiosity and drive to transform our business. My passion and energy inspire others to embrace change and renew for the better.

SPEED & SIMPLICITY

I always keep it simple. I analyze, discuss, and then act. I do not need to wait for the full picture; 80/20 will do. I will make mistakes, but I will learn from them.

PROUD & NEVER SATISFIED

I am on a journey of continuous improvement. Progress energizes me. I celebrate successes and focus even more on the opportunities ahead.

HONESTY & TRANSPARENCY

I tell the truth, am candid, and face reality. I acknowledge when things go wrong, share information openly and proactively, and find solutions.

MERITOCRACY

I support meritocracy openly. I reward behaviors and results based on consistently applied and transparent criteria. I am fair and inclusive.

AUTHENTICITY & HUMILITY

I am genuine, sincere, and always learning. I advocate for my ideas, while listening to others, trying new things, and supporting the best solutions.

ACCOUNTABILITY

I own it. Period. All the time, every day, and in all that I do, I live unprecedented ownership.

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OUR CODE. OUR RESPONSIBILITIES.

Who Must Follow the Code?

Everyone at ITT. That includes employees worldwide (including part-time and temporary workers and contractors), officers, board members and other contractually obligated ITT stakeholders. We are all accountable.

What happens when our Code is violated?

Our customers' trust is weakened and our image is tarnished. Violations can result in disciplinary action – up to and including termination of employment – and, in some cases, civil or criminal consequences for the person involved and for ITT.

It is important to communicate with courage and speak up if you have concerns about potential misconduct. Please refer to the “If You See It, Say It” section on raising concerns on page 7 for further guidance.

What if there is conflict between the Code and local law or custom?

If a local law or custom ever conflicts with our Code, always apply the higher standard of ethical business conduct. If you are still unsure, seek guidance. Local resources include your manager and an Ethics Champion.

What do we expect of our leaders and managers?

While we are all responsible for upholding our values, our leaders and managers have a profound effect on our ethical culture and are instrumental in driving accountability. As a leader, we rely on you to:



Be a good example for others. Model the Code in your behavior and demonstrate why employees should invest in our purpose. Help other team members work ethically and honestly by always upholding the principles of our higher performance culture.



Listen and respond. Foster an environment in which employees feel comfortable coming to you with questions and concerns. Listen for understanding and provide guidance when appropriate. Always follow our procedures to report any conduct that you believe is, or may be, unethical or illegal. Protect the identity of employees who report potential misconduct.



Prevent Retaliation. Never retaliate or permit retaliation by others against someone who has made a report in good faith. Protect all team members by watching for signs of retaliation and reporting the behavior. Anyone who has been found to have retaliated against someone raising a concern will be subject to appropriate discipline, up to and including termination.

On the pages that follow, you will find details about how we can establish a higher performance culture guided by our core principles.



IF YOU SEE IT, SAY IT

If something does not seem right, or it appears to conflict with the requirements of this Code of Conduct, a policy or the law, you have an obligation to speak up. By speaking up about issues and concerns, we can work together on solutions that make our company stronger.

If You're Not Sure, Find Out More

Start with your manager or supervisor – he or she is in the best position to understand and take appropriate action. If you feel uncomfortable speaking with your manager or supervisor, there are other resources available to help you. You may contact:

- **Your local, Value Center or Headquarters Human Resources Leader**

- **Our Chief Compliance Officer at ITT**

[The Chief Compliance Officer](#)

Phone: +1 914.641.2186

Chief.ComplianceOfficer@ITT.com

- **Our Ethics Helpline**

[ITT Ethics Helpline](#)

Available 24/7 via phone or web in your local language

Phone: +1 888.546.4972 (local phone numbers available)

ittethicshelpline.ethix360.com

- **Any ITT Ethics Champion, including ITT headquarters Ethics Champion**

[ITT Headquarters Ethics & Compliance Department](#)

Ethics.Champion@ITT.com

An Ethics Champion is ...

An ITT team member appointed to listen and respond to questions or concerns about potential violations of the Code of Conduct, a law or regulation or a company policy and offer guidance or file a formal request for investigation, as appropriate. Each ITT location has at least one Ethics Champion. To identify your site's Ethics Champion, contact ethics.champion@itt.com.

What happens next?

REPORTING YOUR CONCERNS

No matter who you contact or which resource you choose, your concern will be promptly reviewed and, when necessary, investigated by a team with appropriate subject matter expertise. You will have the option to provide your name and contact information, or you can choose to remain anonymous, where permitted by law. During the investigation process, we listen for understanding and assume positive intentions. To that end, the honest input of everyone involved in the investigation is mandatory.

As an ITT employee, you are required to cooperate fully with investigations and to promptly, completely and truthfully comply with all requests for information, interviews or documents. The information you provide will be shared only with those individuals with a need to know.

Anyone who fails to cooperate with or obstructs an investigation in any way will be subject to appropriate discipline, up to and including termination.

No retaliation

Never fear retaliation or let it discourage you from asking questions or sharing concerns. ITT does not allow any form of retaliation against anyone who raises a concern in good faith, even if later it is determined that the concern is unsubstantiated. If you believe you have been retaliated against, reach out to the Chief Compliance Officer at ITT. Anyone who has been found to have retaliated against someone who raises a concern will be subject to appropriate discipline, up to and including termination.

What does “good faith” mean?

The information you report can lead to the initiation of internal investigations as well as investigations by public authorities and other consequences. Sharing a concern in good faith means you honestly believe there may be a violation of our Code, our policies or the law.

There will be significant consequences for the knowing submission of false or misleading information. Reports made in good faith and to your best knowledge will not result in any negative action by the company.

What is retaliation?

Retaliation can take many forms, some subtle and some more direct. If any actions are taken as “punishment” for speaking up or participating in an investigation including, but not limited to the following, it could constitute retaliation: threatening, bullying or belittling; suspension, demotion or termination; denial of benefits; denial or raise or bonus; negative performance reviews (when not warranted); removal from key accounts or projects; or a reduction in hours.

OUR ETHICS HELPLINE

ITT's 24-hour, internationally accessible, third-party helpline is a comprehensive and confidential reporting tool that assists management and team members in addressing fraud, abuse and misconduct in the workplace. If you contact our Ethics Helpline:

- You will have the option to provide your name and contact information, or you can choose to remain anonymous, where permitted by law.
- A specially trained communication specialist will document your concern in detail, or you can elect to complete a customized web-form.
- Your call will not be recorded or traced. Online reports are handled through a secure third-party website that is specially designed to maintain confidentiality.
- The information you provide will be relayed to ITT Ethics & Compliance in the United States, and potentially elsewhere, on a need-to-know basis, for appropriate investigation and follow-up.

If you're not sure, find out more

Contacts: Ethics & Compliance; Ethics Champions

ITT Policy: Ethics & Compliance Program Manual; Speaking Up Policy: Reporting Issues of Concern

Our Employees

- Health and Safety
- Respect in the Workplace
- Our Inclusive Meritocracy
- Secure Workplace
- Drugs and Alcohol
- Insider Trading

ITers thrive in a **Meritocracy**. We conduct ourselves with **Authenticity & Humility**. As always, in all we do, we take **Accountability** for our actions.



HEALTH AND SAFETY

Together... We consider our people to be at the center of everything we do. We do not compromise when it comes to safety. We look out for one another by taking unprecedented ownership of our work environment. We aim for an injury-free workplace by following safety rules and reporting accidents or unsafe conditions.

As an ITTer...

PROTECT YOURSELF AND OTHERS

- Comply with all health and safety laws, policies and regulations that apply to your job and work location and complete all required training.
- If you are required to wear or use safety equipment, materials or devices for your job, wear them properly, according to our policies and the manufacturers' instructions.
- Communicate and enforce all applicable safety requirements to visitors you bring onto an ITT site.

IF YOU SEE IT, SAY IT

Immediately report any safety hazards, unsafe working conditions or job-related injuries to your manager or supervisor or an Environment, Safety, Health and Security (ESH&S) representative.

Q&A

Q: We recently had a visit at our facility from a Value Center leader. She asked for a tour of our manufacturing operation and was given safety glasses. Shortly after the tour started, I noticed that she was not wearing them. I approached her and reminded her of our safety policies, insisting on the use of safety glasses within the facility. Did I do the right thing?

A: Absolutely. Personal Protection Equipment (PPE) is required for everyone at every level. Your insistence was not an act of disrespect, but a reflection of your concern for your colleague's safety.



IF YOU'RE NOT SURE, FIND OUT MORE

Contact: Local Manager or Supervisor; ESH&S

ITT Policy: ESH&S Manual

RESPECT IN THE WORKPLACE

Together... We value our colleagues and treat each other with respect. We are accountable for a positive environment and we are fair and inclusive.

As an ITTer...

TREAT OTHERS WITH RESPECT

- ITT does not tolerate any form of harassment or inappropriate behavior towards individuals or groups:
 - Harassment – aggressive pressure and intimidation, which can be verbal, physical or visual. It includes bullying, racial slurs and inappropriate jokes as well as posting or sharing statements or images that individuals may find offensive.
 - Sexual harassment – unwanted sexual advances or obscene remarks. It includes promising or providing employment, a promotion, compensation or special treatment in return for sexual favors. It also includes inappropriate or unwanted touching as well as posting or sharing obscene images, objects or materials.
- Always be aware of the impact that your actions and comments have on your intended – and your unintended – audience.
- Pay special attention to personal blind spots, moods and thoughts that may result in unintentionally offensive actions and comments.
- Be courteous in every interaction with team members, customers and business partners. Whether face-to-face, virtually, on the phone or in writing, always demonstrate the highest level of professionalism.

IF YOU SEE IT, SAY IT

Do not ignore any form of harassing behavior in the workplace or at a work-related event – whether it happens to you or someone else (including business partners and other third parties). Share your concerns.



Q&A

Q: I overheard a supervisor raising his voice to a team member, saying she was not a team player and was stupid. What should I do?

A: We are all accountable for our work environment and have a responsibility to our team members to ensure that they are not subjected to harassment. We encourage you to intervene. There are several ways you can do so, including encouraging the team member to report the problem, speaking with your manager or supervisor, reporting your concern to ITT Human Resources or contacting our Ethics Helpline to raise your concern.

IF YOU'RE NOT SURE, FIND OUT MORE

Contact: Local Manager or Supervisor; Human Resources

ITT Policy: Harassment, Discrimination and Retaliation Prevention

OUR INCLUSIVE MERITOCRACY

Together... We are fair and inclusive and openly support meritocracy. We listen to and appreciate the contribution of every team member in every location. It is the variety of talent, ideas, opinions and experiences – our collective know-how – that gives us a competitive advantage. It is how we build higher performance culture and deliver the best solutions. It drives our creativity, innovation, decision making and ability to serve our customers.

As an ITTer...

SUPPORT EACH OTHER

- Respect the personal beliefs and values of every individual. Listen and be receptive to different backgrounds and points of view.
- Promote a positive workplace.

IF YOU SEE IT, SAY IT

If you feel you are a victim of discrimination or suspect that someone else is, raise your concerns.

LEAD WITH INTEGRITY

- If you lead or supervise others, honor ITT's commitment to our inclusive meritocracy and be a role model.
- Recruit, employ, train, compensate and promote competent and responsible people without regard to characteristics such as race, religion, ethnicity, age, gender, gender identity, sexual orientation, disability, marital status or any other legally protected basis, in accordance with all applicable federal, state and local laws or regulations.
- Do not use ITT facilities, funds or communications tools to promote personal beliefs.

Q&A

Q: After selecting members for a new team, I discovered that one of the members has a religious commitment that would interfere with the preferred meeting time of other members. How should this be handled?

A: At ITT we want to create teams that are going to deliver the best results and positively impact our



company. Where possible, we accommodate special requirements of team members, recognizing each person's unique contribution. Diversity of viewpoints, background and experiences gives us a competitive advantage. In some jurisdictions there are characteristics that are legally protected, such as race, religion, ethnicity, gender, gender identity, sexual orientation, age, disability or marital status, and we may be legally required to make accommodations. Where it is not possible to accommodate special requirements, please contact ITT Legal or ITT Human Resources to ensure that your actions do not violate local law.

IF YOU'RE NOT SURE, FIND OUT MORE

Contact: Human Resources

ITT Policy: Equal Employment Opportunity (EEO) for Protected Veterans and Individuals with Disabilities

SECURE WORKPLACE

Together... We value each other and are accountable for our collective well-being and security. We comply with all security measures and ITT's zero-tolerance policy for workplace violence.

As an ITTer...

PREVENT WORKPLACE VIOLENCE

- Never threaten or harm another person or display violent behavior in the workplace. ITT's zero-tolerance policy for workplace violence applies to behavior on company premises as well as to the behavior of our team members engaged in ITT business anywhere in the world.
- Do not bring a handgun, firearm or weapon on ITT premises. Possession of a handgun, firearm or weapon of any kind on ITT premises is prohibited, regardless of whether you are licensed to carry such a weapon.

STRENGTHEN OUR SAFETY AND SECURITY

- Follow all security policies for your location and stay alert to keep our people safe and our facilities and property secure.
- Always use your employee badge to enter the workplace.
- Ensure that any visitors display a visitor's badge and follow ITT requirements for escorted and unescorted visitation.

IF YOU SEE IT, SAY IT

Immediately report any safety or security incidents or concerns to your manager or supervisor, ITT Human Resources or ESH&S.



IF YOU'RE NOT SURE, FIND OUT MORE

Contact: Local Manager or Supervisor; Human Resources; ESH&S

ITT Policy: ESH&S Manual

DRUGS AND ALCOHOL

Together... We are accountable and believe in being at our best at all times, so we never allow alcohol, drugs or controlled substances to jeopardize our safety, productivity, performance, reliability or judgment.

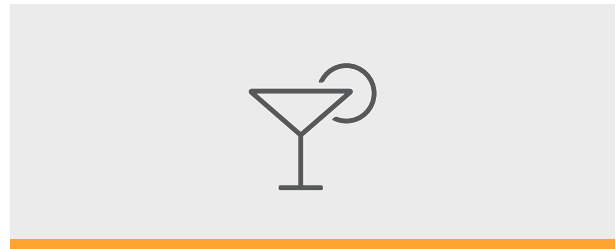
As an ITTer...

ACT RESPONSIBLY

- Never possess, use, purchase or sell drugs on company property or while acting on behalf of ITT.
- Do not consume alcohol while on company property, or while acting on behalf of ITT, except for lawful, moderate and prudent consumption at company events, meetings or business meals. Always be responsible, use good judgment and follow local laws and regulations.
- Never operate ITT-owned equipment or ITT-owned vehicles or work while under the influence of, or impaired by, alcohol or by prescription or non-prescription drugs.
- Notify your supervisor, manager or ITT Human Resources of any circumstances that may impair your work performance, safety or the safety of others.

IF YOU SEE IT, SAY IT

If you see or suspect impaired work performance from the use of drugs or alcohol at work or while on ITT property, share your concerns with your manager, supervisor or ITT Human Resources.



Q&A

Q: A team member appears to be under the influence of drugs or alcohol while at work. What should I do?

A: Immediately contact your local management, ESH&S representative or ITT Human Resources and alert them of your concern. Take appropriate steps to ensure the safety of yourself, your team member and anyone who could potentially be at risk of injury, which may include turning off machinery and interrupting production.

IF YOU'RE NOT SURE, FIND OUT MORE

Contact: Local Manager or Supervisor; Human Resources; ESH&S

ITT Policy: Substance Abuse and Testing

INSIDER TRADING

Together... We understand that we are in a position of trust and are accountable when it comes to protecting nonpublic information. We know that it is a violation of law to make stock trades based upon any material nonpublic information or to provide others with material nonpublic information at any time.

As an ITTer...

DO NOT TRADE ON, SHARE OR PROVIDE MATERIAL NONPUBLIC INFORMATION

- Make sure you understand the kind of information considered to be material nonpublic information. Information is likely to be “material” if it would influence an investor to buy, sell or hold the securities of a company, and it is “nonpublic” if it has not yet been released outside of the company (through a press release, for example).
- Remember, even if you leave ITT, these prohibitions apply.

MATERIAL NONPUBLIC INFORMATION INCLUDES...

Nonpublic information about mergers or acquisitions, sales or earnings results or expectations for future results, financial forecasts, large contracts, new strategies or offerings, major personnel changes or any other significant transactions. This extends to information we may obtain about companies with which we do business. If you are not sure if information is considered inside information, ask ITT Legal.



Q&A

Q: I heard in a meeting that ITT is planning to acquire a publicly traded company. Can I let a friend know about this as a potential investment opportunity?

A: No. This information would be considered material, nonpublic information, and if your friend acts on the information, both of you could be in violation of insider trading laws and could face criminal liability.

IF YOU'RE NOT SURE, FIND OUT MORE

Contact: Legal; Finance

ITT Policy: Stock Trading and Confidentiality

Our Customers and Suppliers

- Anti-Bribery
- Gifts, Entertainment and Travel
- Working with Suppliers and Other Third Parties
- Anti-Trust and Fair Dealing
- Trade Compliance
- Government Contracting
- Personal Relationships and Conflicts of Interest

We value our relationships with our customers and suppliers and act with **Honesty & Transparency**—and demand the same of them. We find solutions with **Speed & Simplicity**. We have a strong **Work Ethic & Integrity** in all we do.



ANTI-BRIBERY

Together... We get the job done but we get the job done right. 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.

As an ITTer...

RECOGNIZE A BRIBE

- Be aware that a bribe may be something other than a payment offered to improperly influence a decision – it can take the form of a gift, a favor, a loan, a job or even an offer of entertainment or travel. A charitable or political contribution may also be considered a bribe if it is offered to influence a decision.

CONDUCT BUSINESS WITH INTEGRITY

- Do not offer, give, promise or receive a bribe or anything else of value (including, but not limited to, cash) in order to improperly influence a decision or gain an unfair advantage.
- Follow the statutory, regulatory and contractual provisions governing the work you do.
- Do not make facilitating payments unless there is an imminent threat to your health or safety.
- Be accountable to ensure your job-related expenses are appropriate and consistent with our policies.
- Be accurate and complete when recording payments in our books and records (see Accurate Recordkeeping on page 33).

IF YOU SEE IT, SAY IT

Report any actual or suspected acts of bribery or corruption to ITT Legal, ITT Ethics & Compliance or ITT Finance.

IF YOU'RE NOT SURE, FIND OUT MORE

Contacts: Legal; Ethics & Compliance; Finance

ITT Policy: Anti-corruption



A FACILITATING PAYMENT IS...

A nominal payment (sometimes called a “grease payment”) that is made directly to a government official to perform or expedite a routine, nondiscretionary government action to which a company is already entitled, such as for processing governmental paperwork, loading or unloading cargo, picking up or delivering mail or obtaining phone service, water or power supply.



DID YOU KNOW?

Bribery laws vary from country to country, so ITT makes remembering our policy easy – a bribe in any form, whether given to or received from anyone (e.g., a government official or a commercial customer) is always wrong and always prohibited.

GIFTS, ENTERTAINMENT AND TRAVEL

Together... We understand that the exchange of business courtesies can build good working relationships, but we are careful to act with integrity and to follow our company policies to make sure that a business courtesy is never given with the intent to persuade anyone to act illegally or dishonestly.

As an ITTer...

BE FAMILIAR WITH OUR POLICIES

- Make sure you know what is appropriate. Never give or accept anything that:
 - Is being given in order to obtain or retain business.
 - Could influence – or give the appearance of influencing – a business decision or that would not be considered customary business practice.
 - Would violate a law or regulation or the policies of either the giver or recipient.
 - Could be seen as lavish, extravagant or unreasonable.
 - Could embarrass ITT or harm our reputation.
- Never circumvent the rules by using your own personal funds or by asking someone else to do something that you are not permitted to do yourself.
- Never request or provide a business courtesy with the intent of improperly influencing a business decision.
- Refuse any gift or invitation that exceeds nominal value or seems inconsistent with our policies and immediately report such an offer to your manager or supervisor.
- Be sure all gifts are transparently and accurately recorded in ITT's books and records.

Q&A

Q: My team members and I are working late with a supplier to discuss the possibility of the supplier performing work for ITT. The supplier has suggested that we should take a break and go out to dinner. They have offered to buy dinner for the entire team. Is it allowable for my team members and me to accept the supplier's offer to buy dinner?

A: No. While you are in the process of making a decision about using a particular supplier, you must be careful not



to be inappropriately influenced – or give the appearance that you were influenced. Attending dinner together is permissible; however, each company should pay for its own employees' meals.

When it comes to our commercial customers, you...

MAY GIVE OR ACCEPT:

- A gift of nominal value that is connected to a recognized local holiday or event.
- Promotional items of nominal value that bear an identifier (name, logo, etc.) and are distributed to customers for advertising or commemorative purposes or to generate goodwill.

MAY GIVE OR ACCEPT ENTERTAINMENT (INCLUDING MEALS, SOCIAL EVENTS AND SPORTING EVENTS) IF:

- Both you and the customer attend.
- The offer made is reasonable and serves a legitimate business purpose.
- The offer is infrequent.

MAY NOT GIVE OR ACCEPT TRAVEL OR OVERNIGHT LODGING WITHOUT PRIOR WRITTEN APPROVAL FROM ITT LEGAL

When it comes to our government customers, you...

**MAY PROVIDE ONLY “MODEST”
REFRESHMENTS AND MEALS IN
ACCORDANCE WITH OUR POLICIES**

A GOVERNMENT CUSTOMER IS...

Any federal, state or local government employee, military official, political official or political party.

Q&A

Q: A commercial customer has asked to visit our testing facility. To do this, he must travel on an airplane and spend a night in a hotel near the facility. He has asked me if ITT will pay the costs of the trip.

A: As long as there is a legitimate business reason for the visit, and the expenses are reasonable and related only to the testing facility visit, paying for the trip would likely be permitted. You would need to make sure you comply with our policies as well as the customer's policies and obtain all necessary approvals in advance.

IF YOU'RE NOT SURE, FIND OUT MORE

Contacts: Local Manager or Supervisor; Ethics & Compliance; Legal

ITT Policy: Gifts, Hospitality & Travel for Customers and Government Officials

WORKING WITH SUPPLIERS AND OTHER THIRD PARTIES

Together... We count on honest and productive partnerships with our suppliers and other third-parties to help us find solutions for success and strengthen our business. We treat our counterparts fairly and with respect, and we expect them to uphold our high standards.

As an ITTer...

CHOOSE RELATIONSHIPS WISELY

- When selecting a supplier, be sure to work within the guidelines or policies that have been established and always base your decisions on objective criteria such as quality, price and service.
- Make sure you know who you are working with, the business practices they employ and the reputation they have for operating honestly and ethically.
- Make sure suppliers understand what we expect by knowing and agreeing to comply with our Supplier Expectation Protocols.
- Never use supplier relationships for personal gain including financial benefit, performance of personal work, employment for yourself or Family Members, gifts, services or personal discounts.
- Never accept inappropriate gifts, entertainment, rebates, kickbacks or anything that could interfere – or could be perceived by others to interfere – with your objective decision making.
- Before you discuss any ITT plans, information, systems or processes with a third party, be certain that there is a current non-disclosure agreement in place.
- Follow ITT's policy for engaging anyone as a sales agent, marketing representative, distributor or dealer. This includes vetting the third party through due diligence and engaging ITT Ethics & Compliance and ITT Legal to ensure all required due diligence and appropriate legal requirements are in place.
- Be aware that the use of lobbyists must be preapproved by ITT Legal.



IF YOU SEE IT, SAY IT

In conjunction with your Value Center strategic sourcing organization and/or ITT's Global Indirect Services department, monitor the work of our suppliers to ensure that they are upholding our Code, our policies and their contractual obligations. If you suspect any violations, raise your concerns.

Q&A

Q: A supplier is experiencing hard times. She suggested that if we drop a couple of other suppliers, she would fill in the gap by selling us all of the materials at a cut rate, and that "something" might be in it for me. It does not seem right, and yet it could save ITT a lot of money. What should I do?

A: This vendor may be suggesting a kickback to you, an activity that we strictly prohibit. Do not accept this proposal. Instead, discuss this with your manager or supervisor. Our relationships with vendors are built on trust, honesty and transparency. We evaluate vendors equally and fairly based not only on price, but on a number of other requirements.

IF YOU'RE NOT SURE, FIND OUT MORE

Contact: Local Manager or Supervisor; Ethics & Compliance; Legal

ITT Policy: Supplier Expectation Protocols; Third-Party Representatives Anti-Corruption

ANTITRUST AND FAIR DEALING

Together... We believe in a thriving marketplace, and we comply with laws designed to preserve competition. We compete vigorously, but with integrity, and outperform our competitors based on the merits of our products and services, never on unfair practices.

As an ITTer...

PROMOTE FAIR AND OPEN COMPETITION

- Remember that decisions about how we compete in the marketplace are our own and never involve discussions with our competitors.
- Follow the antitrust and competition laws in the countries where we operate. We do not engage in activities that unfairly limit free trade or competition, such as:
 - Agreeing with competitors to manipulate prices or production, to divide customers or markets or to refuse to do business with another company.
 - Participating in any form of bid rigging.
 - Exchanging nonpublic information that could lead to the coordination of pricing.
- Avoid even the appearance of anti-competitive behavior by avoiding any discussions with competitors involving information that may be considered competitively sensitive.

DEAL FAIRLY

- Provide only truthful information about the quality, features and availability of our products and services.
- Do not make false statements about our competitors' products or services.

GATHER COMPETITOR INFORMATION ETHICALLY AND LAWFULLY

- Seek competitive information through public sources, such as news stories and trade journal articles – never through deception, misrepresentation, theft or other illegal or unethical means.



- Do not obtain or use a competitor's confidential or proprietary information. If someone provides you with information about a competitor that you believe may be confidential, contact ITT Legal.
- If you are bidding on a government contract and receive source selection information (information that the government uses to evaluate bids or proposals), consult with ITT Legal.
- If you join ITT from a competitor, do not bring or use confidential or proprietary information from your previous employers.

Q&A

Q: I was inadvertently copied on an email from one of our customers which contained some confidential pricing information about a competitor. Can I share this information with others on my team?

A: Even though it was not your fault the email was sent to you, using confidential information of a competitor is a violation of our Code and may also be a violation of the law. You should reach out to ITT Legal to seek advice on what steps to take.

IF YOU'RE NOT SURE, FIND OUT MORE

Contact: Legal; Ethics & Compliance

ITT Policy: Antitrust and Competition

TRADE COMPLIANCE

Together... We conduct business around the world and follow all international trade laws that regulate the import and export of our products, services and technology. As a United States-based company, we comply with all trade and economic sanctions imposed by the United States Government and other international governments, as applicable. We act with speed and simplicity without sacrificing integrity.

As an ITTer...

RESPECT TRADE LAWS

- Comply with the import and export laws and regulations associated with the countries in which you do business.
- Be aware that the laws of more than one country may apply in cross-border transactions. If you work for an ITT business unit not located in the United States, the trade laws, regulations and sanctions of that country and the United States both apply.
- Ensure that anything intended for import or export is properly classified in advance, based on the country of origin, the destination, the end use and the end user – take care to secure all required documentation, labeling, licensing, permits and approvals.
- Do not conduct business with countries that are subject to United States or other applicable trade embargoes or economic sanctions. If you have questions, contact ITT Trade Compliance.
- Do not participate in boycotts that the United States does not support. If you receive requests to comply with a boycott (or requests to supply boycott-related information), contact ITT Trade Compliance.
- Do your part to ensure the integrity of our supply chain by communicating our trade compliance policies to parties conducting business on our behalf.
- Be aware that violations of trade laws can result in the loss of import and export privileges as well as civil and criminal penalties. When in doubt regarding trade regulations or policies, seek guidance from ITT Trade Compliance.



Q&A

Q: I was asked about shipping ITT product from an ITT facility in Germany to a customer in a country that the United States has embargoed. It was suggested that we could ship to one of our distributors in England, who could then ship these items to our customer in the final destination country. Is this allowed?

A: No. This would still be considered an illegal export. Because ITT is a United States-based company, all of its subsidiaries must follow United States trade laws and regulations in addition to their local laws. Do not participate in, condone or contribute in any way to this kind of arrangement.

IF YOU'RE NOT SURE, FIND OUT MORE

Contact: Trade Compliance; Legal

ITT Policy: Trade Compliance Manual

GOVERNMENT CONTRACTING

Together... We believe there is dignity in our relationships with our government customers. We recognize that the laws and requirements related to government contracts are generally stricter than those governing our commercial contracts.

As an ITTer...

PROMOTE PROCUREMENT INTEGRITY

- Comply with the requirements of applicable Federal Acquisition Regulations (including policies prohibiting trafficking in persons), ITT's Contractor Responsibility Program (CRP) and our Contracting with the United States Government Code of Conduct Supplement, when conducting business with the United States Government.
- Make sure our subcontractors understand that there are requirements in our government contracts that are also applicable to their subcontract, including, in some cases, the maintenance of a code of ethics.
- Do not attempt to obtain or use:
 - Government confidential information or source selection information.
 - Other contractors' nonpublic bid or proposal information including cost or pricing data or proprietary information.
- Follow the rules when it comes to providing gifts, entertainment or travel as set forth in our policies.
- Ensure that quality assurance and material sourcing meet the specifications of our contracts.
- Do not discuss jobs or business opportunities with current or former government officials or employees, military personnel or their family members unless authorized by ITT Human Resources or ITT Legal.
- Ensure that all information that we submit in government contract negotiations is accurate, current and complete.

BE A GOOD STEWARD

- Properly safeguard and control access to all confidential, proprietary or controlled technologies information which, if released, could threaten a country's national security (i.e., classified information).



- Ensure any government property ITT is authorized to use is used in accordance with applicable contracts.
- Make sure that team members, visitors, consultants, subcontractors and other business partners have proper authorization before granting them access to confidential, proprietary or controlled technologies, information or restricted areas of facilities.

YOU SHOULD CONTACT YOUR MANAGER OR SUPERVISOR OR ITT LEGAL IF YOU:

- Have any questions about the government contracting work you do.
- Know or suspect of a conflict of interest in our government/contractor relationship.
- Encounter a conflict between our Code and the laws of a particular country.
- Are contacted by a government representative regarding an audit or investigation.

IF YOU SEE IT, SAY IT

Speak up about any activity that could put our government contracts at risk.

IF YOU'RE NOT SURE, FIND OUT MORE

Contact: Local Manager or Supervisor; Legal; Ethics & Compliance

ITT Policy: Pay to Play Compliance; Code of Conduct Supplement: Contracting with the United States Government

PERSONAL RELATIONSHIPS AND CONFLICTS OF INTEREST

Together... We are transparent when it comes to personal interests or relationships that may impact our ability to make decisions in the best interest of ITT. We are conscious that our position has the potential to create a conflict of interest when we make business decisions that involve friends and Family Members.

As an ITTer...

AVOID CONFLICTS

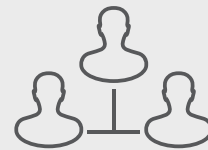
- Be alert to the circumstances where your personal relationship with another ITT team member, supplier, customer or other stakeholder could compromise your ability to make independent financial, employment or other business decisions (i.e., create a conflict of interest).
- Never use your position at ITT to provide an inappropriate financial benefit to, or receive a personal financial benefit from, a Family Member or anyone with whom you have a personal relationship.
- Never influence anyone to enter into, continue or terminate a business relationship with a company in which you or a Family Member has a financial interest.
- Do not participate in employment decisions (e.g., hiring, compensation, promotion, termination) involving Family Members.

IF YOU SEE IT, SAY IT

If you have a conflict of interest, disclose the nature of the conflict and remove yourself from any related decision making. If you are in doubt about whether or not there is a conflict of interest, discuss your situation with ITT Legal.

Q&A

Q: I am part of the decision-making team for a new supplier and my cousin works for one of the companies we are considering. My cousin has the knowledge and experience that might benefit ITT and his company has a great track record in terms of on-time delivery. Is it ok for me to introduce him to some people at ITT so that he could tell them about his company?



A: Even though you believe your cousin's company might be a good fit with ITT, you need to be transparent about your relationship and remove yourself from the decision-making process so as not to suggest the appearance of something unfair or improper.

BE ALERT TO PERSONAL FINANCIAL INTERESTS THAT CAN ALSO POSE A CONFLICT

- Do not accept opportunities from or agree to work as a consultant for an ITT competitor, customer or supplier.
- Do not hold an influential financial interest in – or exercise control over – a company that does business, seeks to do business or competes with ITT. The potential for a conflict generally will depend on the size of your investment, your job and the nature of the business relationship.

Q&A

Q: I am the manager of a team of six employees. Recently, I have engaged in a romantic relationship with one of the people I manage. Does this pose a conflict of interest?

A: Yes. As a manager, you have an obligation to disclose the romantic relationship at an early stage and the reporting relationship between you and your direct report will be reviewed.

IF YOU'RE NOT SURE, FIND OUT MORE

Contact: Local Manager or Supervisor; Ethics & Compliance; Legal

ITT Policy: Conflicts of Interest; Employment of Closely Related Individuals

FAMILY MEMBERS INCLUDE...

Spouses, parents and step-parents, children and stepchildren, brothers and sisters, step-brothers and step-sisters, nephews and nieces, aunts and uncles, cousins, grandparents and grandchildren, in-laws and anyone who lives with you other than hired domestic help.

Our Shareholders and our Communities

- Intellectual Property
- Confidential and Proprietary Information
- Data Privacy
- Physical and Financial Assets
- Accurate Recordkeeping
- Speaking on Behalf of ITT
- Environmental Protection and Human Rights
- Making a Positive Impact

We are **Proud & Never Satisfied** and conduct business with a **Passion for Renewal** to transform ITT for the betterment of our shareholders and the communities we serve. We make determinations with **Granularity & Data-Based Decision Making** to best serve our stakeholders. Our leaders reward **Service Leadership**.



INTELLECTUAL PROPERTY

Together... We understand the value of the intellectual property (IP) created from the curiosity and drive of our employees and recognize our responsibility to protect it. The technology, methods and information we possess makes us who we are, so we are careful to safeguard them from unauthorized use or disclosure.

As an ITTer...

PROTECT OUR INTELLECTUAL PROPERTY

- Work with ITT Legal as you create IP to decide on the appropriate way to protect it. Remember, once it becomes public (for example, by selling the product), the opportunity to protect it is forever lost.
- Share IP inside the company only with those who have a legitimate business need to know it.
- Share IP outside the company only with those who have a legitimate business need to know it and have signed a non-disclosure agreement.
- Respect the IP of others, using it only after seeking and receiving advice from ITT Legal.
- Immediately forward unsolicited IP to ITT Legal for disposition. Do not use it. Do not share it.
- Remember, if you should leave ITT, your obligation not to use or disclose our IP endures.

INTELLECTUAL PROPERTY IS...

An idea for a product or process that is the result of original creative thought. It includes patents, technical data, copyright and know-how, as well as our trademarks, trade secrets, commercial data and business methods.

A TRADE SECRET/KNOW-HOW IS...

Material that is useful, provides economic value, cannot be easily obtained or independently conceived and is sufficiently guarded by its owner. It cannot be protected by government registration. It can include confidential or proprietary technical information about current or planned products, supplier lists, marketing or service strategies.



DID YOU KNOW?

ITT owns any work product (for example, idea, process, trademark, invention or improvement) that you conceive in connection with your work with us. Ownership continues even if you leave our organization.

IF YOU'RE NOT SURE, FIND OUT MORE

Contact: Legal

ITT Policy: Intellectual Property

CONFIDENTIAL AND PROPRIETARY INFORMATION

Together... We look at knowledge – information, know-how, trade secrets, skills and data – as a critical asset that enables data-based decision making and gives us a competitive advantage. We must protect confidential and proprietary information about our team members, our company, our customers, our competitors and companies with which we do business.

As an ITTer...

KNOW WHAT IS CONFIDENTIAL

- Recognize the kinds of knowledge we need to protect:
 - Information about our business such as new product research, specifications or designs, manufacturing processes and methods, financial projections, unpublished sales and earnings figures, strategic business plans, potential divestiture, merger or acquisition activity, product cost information, marketing plans and customer lists.
 - Personal Information about our team members, consultants, business partners, customers and suppliers. (see Data Privacy on page 31)
 - Information about people who apply for jobs at ITT such as background checks, drug test results and financial records.
 - Information about other companies such as that protected under a non-disclosure agreement.

DO YOUR PART TO PROTECT IT

- Follow our policies and the laws where you operate.
- Know the rules and requirements that relate to labeling, handling, distribution and disposal of information, including our records management policies.
- Disclose confidential business information only to those who are authorized and need it in order to do their jobs.



- Limit the amount of this kind of information you share to what is required to accomplish the business purpose.
- Never talk about confidential business information in public places such as elevators, planes, trains and restaurants, and do not discuss it with friends or family.
- Do not share confidential information from a former employer with ITT, and if you leave ITT, do not share our confidential information with your new company.
- Do not use confidential information for your own purposes or for a third-party unless authorized by ITT in the proper course of your employment.

Q&A

Q: I have recently come to work at ITT from a competitor and I have information to share that I think would be a big help. Is there a problem with sharing documents that might be useful to ITT?

A: If the information is considered confidential to your prior employer, you cannot share it. You were hired for your expertise, not so that ITT could acquire a competitor's confidential information. If you have any doubt about the confidential nature of the information you have from your prior employer, contact ITT Legal.

IF YOU SEE IT, SAY IT

Promptly report any information breach or information loss, misuse, unavailability or other security incident of which you become aware in accordance with our policies. If you have questions or concerns, contact ITT Legal.

IF YOU'RE NOT SURE, FIND OUT MORE

Contact: Legal

ITT Policy: Business Proprietary Information; Records Management and Retention

DATA PRIVACY

Together... We ensure that the private information entrusted to us by our team members, our business partners and our customers remains private. We process and use personal information only for legitimate business purposes and take all the necessary measures to safeguard confidentiality. We follow all applicable data privacy laws and regulations.

As an ITTer...

PROTECT PERSONAL INFORMATION

- Request, collect and use only the personal information relevant for business purposes. Do not use information for purposes other than the original purpose of collection
- Be transparent about the type of information you collect
- Take appropriate measures to protect the information from potential loss, misuse or unauthorized or unlawful access
- Only share (inside and outside ITT) personal information on a need-to-know basis or when required by law
- Do not retain personal information once there is no longer a valid reason for keeping it (business objectives or legal requirements)
- Never leave personal information unprotected

PERSONAL INFORMATION IS...

Any information that could identify a person, either directly or indirectly. Personal information can include, but is not limited to: name(s), address, date of birth, email address, phone number, bank or credit card information, location data, medical information, biometric information, employee ID, benefits, pay or performance information.



Q&A

Q: While I was looking for one of my files on a shared ITT computer drive, I discovered a folder containing confidential information about team members' compensation, dates of birth, offer letters and performance reviews. What should I do?

A: All files containing personal information must be properly stored and secured with appropriate passwords and encryption. In this case, you should immediately close the document and report your finding to ITT Legal & Compliance so the information can be properly secured. Do not copy, download, print or in any other way duplicate the file.

IF YOU SEE IT, SAY IT

Immediately report any potential breach of personal data by reaching out to the Cyber Security Operations Center or ITT Legal & Compliance.

IF YOU'RE NOT SURE, FIND OUT MORE

Contact: Legal & Compliance

ITT Policy: Global Privacy, Data Protection; ITT Employee Data Privacy Information Notice

PHYSICAL AND FINANCIAL ASSETS

Together... We are good stewards of ITT's physical and financial assets. We use them appropriately for business purposes and work to protect them from misuse, mishandling, theft and fraud.

As an ITTer...

PROTECT OUR ASSETS

- Do not use ITT's physical or financial assets for personal gain, or allow others to do so.
- Do not participate in, or allow others to participate in, theft or fraud.
- Read and familiarize yourself with our policies. They provide the basic security information you need to know.
- Use only ITT authorized and approved software and hardware.
- Restrict your use of ITT assets to corporate purposes. Occasional personal use of telephones, computers and other devices is acceptable, as long as it does not interfere with your productivity, violate the law or our policies or cause undue cost to ITT. Never use ITT computers or phones to access or disseminate illegal, obscene, profane, erotic, sexually harassing, racist, defamatory or inflammatory content.
- Do not have any expectation of privacy while using ITT information technology resources, including telephones and email. Our technology assets are company property, and we reserve the right to monitor usage and content to the full extent permitted by law.

TECHNOLOGY ASSETS INCLUDE...

Hardware, software, email, voicemail, intranet and Internet access, computer files, programs and data and any information we create, send, receive, download or store on these systems or resources.



IF YOU'RE NOT SURE, FIND OUT MORE

Contact: Finance; Ethics & Compliance; Cyber Security

ITT Policy: Global Acceptable Use

ACCURATE RECORDKEEPING

Together... Each of us, at every level of our company, takes care to ensure our business records convey an accurate depiction of actual events. We adhere to the systems, controls and procedures we have in place to ensure compliance with the law and the proper management of records throughout their life cycle: from creation, use and distribution to protection, retention and disposal. We recognize that accuracy in recordkeeping is a responsibility we all share.

As an ITTer...

PROTECT OUR ASSETS

Ensure the accuracy and integrity of our books and records.

- Do not misreport or misrepresent data or information, such as orders, sales, inventory, profit, hours worked and expenses.
- Make accurate, true, complete statements, reports and entries, and encourage (or enable) others to do the same.
- Comply with our system of internal processes, controls and accounting principles.
- Access only records you are authorized to view. Share or disclose records only with individuals who are authorized to view the information and have an express business purpose for such access.
- Retain records as prescribed by our Records Management and Retention Policy.
- If you have records subject to a legal hold, follow the guidelines in the notification. If you are not certain about what is required, ask ITT Legal.

A RECORD IS...

A record can be paper or electronic and includes items like memos, emails, contracts or reports. A record can also be a timecard, an expense report or a production report. It can even take the form of an electronic calendar, appointment book, voicemail message or record of expenses.



Q&A

Q: An auditor has requested some records from my department and I realized that a few entries are incorrect. Is it acceptable to correct the entries before releasing the records to the auditor?

A: No. Generally speaking, when our records are requested for review, they need to remain unchanged until the review is completed. However, you should bring your findings to the auditor's attention.

IF YOU'RE NOT SURE, FIND OUT MORE

Contact: Legal; Finance; Ethics & Compliance

ITT Policy: Records Management and Retention

SPEAKING ON BEHALF OF ITT

Together... We are proud to work at ITT but understand that ITT has designated individuals to serve as our official company spokespersons. Unless we are a designated spokesperson, we do not speak on behalf of ITT or give the impression that our views represent the views of ITT.

As an ITTer...

DO NOT SPEAK ON ITT'S BEHALF

- If you are contacted and asked to discuss company business with any members of the press, investors or market analysts, do not provide any information. Advise the outside party that you are not authorized to discuss the subject and refer them to ITT Communications or ITT Investor Relations.
- When referring to ITT in social media, remember that your statements, posts, blogs, Tweets and other communications may influence people's opinion of ITT. Therefore, be sure to communicate that the materials and opinions you are posting are yours and not the company's.
- Never disclose any confidential business information or post anything about our business partners, customers or team members that would constitute a threat, intimidation, harassment, bullying or discrimination.

Q&A

Q: I just heard about some planned changes to the organizational structure of our Value Center that have not yet been announced. I would like to Tweet to let others know about the plans. Is that okay?

A: No. This kind of information is confidential business information and should not be shared on social media or with anyone who is not authorized to know it.

IF YOU'RE NOT SURE, FIND OUT MORE

Contact: Communications

ITT Policy: Public Relations; Regulation FD Policy Regarding Communications with Security Holders, Analysts and Others; Social Media



CONSIDERING DISCUSSING YOUR WORK AT ITT ON SOCIAL MEDIA?

Please remember to:

- Express only personal opinions.
- Include only your personal contact information.
- Not reference our products or services, as this could be considered advertising.
- Maintain the confidentiality of ITT trade secrets and private or confidential information.
- Not post anything that is material nonpublic business information.
- Always be honest and accurate and correct any mistakes quickly.
- Always be fair, courteous and respectful to our business partners, customers and team members.

ENVIRONMENTAL PROTECTION AND HUMAN RIGHTS

Together... We share a commitment to the idea that doing what is right extends into the communities where we operate. We are here to serve all stakeholders. As such, we care for the environment and uphold human rights, regardless of local business custom.

As an ITTer...

MINIMIZE OUR ENVIRONMENTAL IMPACT

- Follow all applicable environmental laws, regulations and ITT ESH&S policies wherever we do business. Require your colleagues and business partners to do the same.
- Feel encouraged to speak with managers and supervisors about opportunities to conserve resources.

FOCUS ON PEOPLE

- Respect and abide by all applicable employment laws in the markets where we operate. If you have any questions regarding applicable employment laws, consult with ITT Legal or ITT Human Resources.
- Do not engage in any acts of human rights abuse or conduct business with those who do.
- Promote fair and equitable treatment for those working on our behalf. Know and follow our policies as they relate to:
 - Complying with wage and hour laws.
 - Ensuring safe and secure working conditions.
 - Prohibiting human trafficking and the use of child or forced labor (including prison or bonded labor).

IF YOU SEE IT, SAY IT

Report potential environmental issues and seek advice on environmental compliance from your ESH&S Representative.

In addition, if you have concerns about possible labor law or human rights violations, report them directly to ITT Legal or ITT Human Resources.



Q&A

Q: I have reason to believe that one of ITT's suppliers is in violation of local laws regarding the handling of industrial waste. What should I do?

A: ITT requires that all team members and business partners comply with all applicable environmental laws and regulations. You should immediately report your concern to an ESH&S representative. They will have the skills to properly investigate and deal with any violations they uncover.

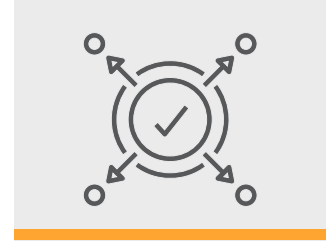
IF YOU'RE NOT SURE, FIND OUT MORE

Contact: Human Resources; ESH&S; Legal

ITT Policy: Human Rights; ESH&S Manual

MAKING A POSITIVE IMPACT

Together... We are committed to making a positive impact in the world and the places where we live and work. We put others first. We want to be better and help others do better.



Volunteer at the corporate level

ITT is committed to sponsoring locally-hosted service days and philanthropic events so our employees can make an impact in communities across the globe. We encourage all our team members to join one another to participate in these volunteer activities and put others first.

Volunteer on a personal level

We support your personal efforts to make the world a better place, and we celebrate your outreach to people and causes that matter to you. Just make sure any volunteer activities that you undertake are lawful and don't create a conflict of interest with the work you do at ITT. And remember—unless you get prior approval from the communications team, don't use the Company name, funds or resources to support your events or activities.

Join your local Employee Resource Group (ERGs)

Join your team members by participating in our ERGs and help us foster an inclusive environment for all ITT employees. Our ERGs regularly celebrate the many diverse communities and perspectives that contribute to our success through special events and initiatives. Your involvement is valued.

GLOSSARY

Ethics Champion:

An ITT team member appointed to listen and respond to your concerns about potential violations of the Code of Conduct, a law or regulation or a company policy and offer guidance or file a formal request for investigation, as appropriate. Each ITT location has at least one Ethics Champion. To identify your site's Ethics Champion, contact ethics.champion@itt.com.

Antitrust:

Legislation preventing or controlling trusts or other monopolies, with the intention of promoting competition in business.

Bribery:

The giving or offering of a gift or other inducement in order to persuade someone to act in one's favor.

Facilitating Payment:

A nominal payment that is made directly to a government official to perform or expedite a routine, nondiscretionary government action to which a company is already entitled.

Good Faith:

Honesty or sincerity of intention.

Government Customer:

Any federal, state or local government employee, military official, political official or political party.

Harassment:

Aggressive pressure and intimidation, which can be verbal, physical or visual. It includes bullying, racial slurs and inappropriate jokes as well as posting or sharing statements or images that individuals may find offensive.

Insider Trading:

The illegal practice of trading on the stock exchange to one's own advantage through having access to confidential information.

Intellectual Property:

An idea for a product or process that is the result of original creative thought. It includes patents, technical data, copyright and know-how, as well as our trademarks, trade secrets, commercial data and business methods.

Material Nonpublic Information:

Information that is not in the public domain that would influence an investor to buy, sell or hold securities of a company.

Sexual Harassment:

Unwanted sexual advances or obscene remarks. It includes promising or providing employment, a promotion, compensation or special treatment in return for sexual favors. It also includes inappropriate or unwanted touching as well as posting or sharing obscene images, objects or materials.

Trade Secret:

Material that is useful, provides economic value, cannot be easily obtained or independently conceived and is sufficiently guarded by its owner.

WAIVERS, AMENDMENTS AND ADDITIONAL INFORMATION

In certain circumstances and upon written request to the ITT Chief Compliance Officer, we may find it appropriate to waive a provision of our Code. Waivers of our Code for executive officers and directors may be made only by the Board of Directors and will be publicly disclosed when required by regulation or law.

We reserve the right to make unilateral changes at any time to our Code or any company policy or procedure.

For United States only: Nothing contained in our Code or in any referenced company policy or procedure should be construed as modifying the employment-at-will relationship. Nothing in this Code is to be interpreted or applied so as to interfere with employees' right to self-organize, form, join or assist labor organizations, to bargain collectively through representatives of their choosing or to engage in other concerted activities for the purpose of collective bargaining or other mutual aid or protection, or to refrain from engaging in such activity.

For Non-United States: Nothing in this Code or in any company policy is intended to limit or interfere with your rights under local laws. In some jurisdictions, this Code may be supplemented by local adaptations, accommodations, additions and supporting documents, in accordance with applicable local law.