



Expertise Applied | Answers Delivered

FUNCTION: Legal	POLICY: Business Conduct and Investigation Policy
PAGE: 1 of 13	REFERENCE NUMBER: LEG.010
EFFECTIVE DATE: January 10, 2024	APPROVED BY: Chief Legal Officer

PURPOSE

Littelfuse, Inc. is committed to conducting business according to its Code of Conduct and the applicable laws and regulations in those places where we do business. Our reputation depends on how our employees perform their work duties. The purpose of this Policy is to define the process for reporting concerns of actual or suspected misconduct and our investigations into misconduct that violates our Code of Conduct.

SCOPE

This Policy applies to all our employees. You must ensure that your own actions, as well as the actions of your team, comply with this Policy.

RESPONSIBILITY

The Chief Legal Officer is responsible for reviewing and maintaining this Policy.

Our management team is responsible for the proper implementation of this Policy. Our management must ensure that all Reports of actual or suspected Personal Misconduct and Financial Misconduct, as these terms are defined in this Policy, are handled properly to ensure accurate reporting and handling.

POLICY

Misconduct by our employees poses an unacceptable business risk which may negatively affect our business operations, the work environment, and our customer relationships. Misconduct also needlessly exposes us to financial, reputation and legal risks.

We promote a culture that encourages people to seek guidance, to raise any concerns they have relating to possibly improper business conduct, and to report any actual or suspected improper business conduct. We prohibit any retaliation against employees who report their concerns to us.

We will promptly, objectively, and thoroughly investigate suspected violations and, where violations are determined to have occurred, take appropriate corrective measures. Our inquiries may also lead to improvements in internal controls, business processes and practices, as well as the protection of the company's financial and legal interests.

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PROCEDURE

Definitions

(a) **“Business-Conduct Standards”** means (i) our Code of Conduct, (ii) laws and regulations applicable in the relevant jurisdictions, and (iii) our written policies, standards, procedures, business practices, and manuals.

(b) **“Financial Misconduct”** means each type of misconduct specified in Appendix A to this Policy.

(c) **“Good Faith”** means that the Reporter reasonably and honestly believes that they are accurate in their perception and assessment of the situation being reported.

(d) **“Helpline”** means our Ethics Helpline.

(e) **“Investigation”** means an objective and reliable determination of the facts and circumstances of reported or suspected wrongdoing affecting our interests. An Investigation also includes inquiries intended to improve our business processes and internal controls.

(f) **“Littelfuse, Inc.”** (or **“we,” “our”** or **“us”**) means Littelfuse, Inc., its business divisions, subsidiaries, and affiliated companies throughout the world.

(g) **“Misconduct”** means either Financial Misconduct or Personal Misconduct alleged to have been committed.

(h) **“Notification”** means the process by which management or another internal department informs the Legal Department of a Report or a completed Investigation.

(i) **“Personal Misconduct”** means each type of misconduct specified in Appendix A to this Policy.

(j) **“Report”** means a report of actual or possible Misconduct.

(k) **“Reporter”** means a person who makes a Report.

(l) **“You”** or **“your”** means a Littelfuse employee, a director or officer, a temporarily hired worker or consultant.

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Your Obligations under this Policy

You are required to follow our Business-Conduct Standards. You are personally responsible for becoming and remaining informed about the relevant Business-Conduct Standards for your job function.

Our managers are required (i) to be familiar with (or take appropriate steps to become familiar with) those Business-Conduct Standards that apply to the business activities they manage or supervise, (ii) to ensure that their subordinates are appropriately trained on Business-Conduct Standards to perform their job functions properly, and (iii) to adequately supervise their subordinates to ensure they follow our Business-Conduct Standards.

Internal Lines of Communication

We strive to develop a culture that produces conscientious and ethically minded employees who are committed to integrity, honesty, openness, and fairness. You have the responsibility to protect us from conduct that can threaten our day-to-day operations, our reputation and future growth.

We are committed to fostering dialogue between management and employees through multiple channels. Our supervisors are expected to maintain an environment that promotes open communication. Our goal is that you will know where to turn when you seek answers to questions about a Business-Conduct Standard or have a concern about actual or possible Misconduct.

We want you to report to us your Good Faith concerns regarding actual or suspected Misconduct. Except where applicable law requires otherwise, if you observe actual or suspected Misconduct, we expect you to report these situations to us promptly.

Making a Report

There are multiple channels for making an inquiry or a Report to us. You may direct your inquiry or Report to any of the following:

- Your manager or department leader.
- The Human Resources or Legal Departments.
- Any member of our management.
- The Ethics Helpline.

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If you make a Report to a manager or department head, they are required to immediately forward the Report to the Legal Department so that the Legal Department may document the Report and ensure its appropriate resolution.

If you make an inquiry or Report and ask to remain anonymous, we will, to the extent possible, honor your request. However, we will advise you (i) that the request for anonymity could hinder or even prevent an Investigation (if one is warranted), and (ii) total anonymity cannot be guaranteed, in compliance with local law. We also cannot guarantee anonymity if you identify yourself to others or provide information in the Report that is likely to identify you.

The Ethics Helpline

We have established the Ethics Helpline, a telephone and web resource, to assist you with guidance or for making a Report. You may contact the Ethics Helpline by calling 800 803-4135 in North America. The Ethics Helpline is available anytime night or day. Translation services are also available. An online Report may be made to the Ethics Helpline at littelfuse.ethicspoint.com.

If you call the Ethics Helpline, you will be asked to provide details of the incident or issue in your Report. You will be asked to disclose your identity. You may decline to provide your identity, and we will still accept the Report from you.

Reports to the Ethics Helpline are considered seriously and handled confidentially.

Third parties who are not our employees are also invited to make a Report.

The laws in some countries restrict the scope of what may be reported through the Ethics Helpline, such as allowing only reports of accounting or financial irregularities. In the event of a conflict between this section and local law, this section should be considered amended to the extent necessary to comply with local law.

Notifications to the Legal Department

(a) Reporting Obligations

The Legal Department is responsible for monitoring Reports and Investigations of Misconduct under this Policy. The Legal Department accomplishes this objective when management makes Notifications regarding the Reports. Proper Notifications allow the Legal Department to identify systemic trends and risk areas in our business operations.

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(2) Proper reporting also allows the Legal Department to ensure that an appropriate Investigation is conducted to protect all the affected company interests.

(3) Our management is responsible for ensuring that Notifications to the Legal Department are made according to this Policy. Our management shall implement the necessary internal processes to meet this requirement.

(b) Notification Requirements

(1) The precise Notification requirements depend on both the type of Misconduct and the severity of the issue reported. The Notification requirements are specified in Appendix A to this Policy.

(2) There are special Notification requirements if a Report of Serious Misconduct occurs. A serious event is a Report with a subject matter which has the potential significantly to harm company business or poses a safety risk to employees. The Notification requirements are specified in Appendix A to this Policy.

(c) Legal Department Reporting Requirements

(1) The Legal Department maintains a database of Reports and Investigations based on the Notifications it has received. The database will include both open and closed Investigations. This database will allow the Legal Department to monitor Investigations and ensure that each Investigation is conducted properly.

(2) The Legal Department shall periodically report to the Board of Directors and executive leadership regarding the Notifications made to the Legal Department and their related Investigations.

(3) The Legal Department will work with key internal departments to review Notifications and Investigations to identify improvements to policies, procedures, and processes.

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Investigations of Reports

When a Report is received, we make a preliminary assessment to determine whether an Investigation is warranted. We investigate if there is a reasonable basis to believe that Misconduct may have occurred. If an Investigation is not warranted, we may refer the Report to another appropriate department for handling.

An Investigation has multiple objectives:

- To determine the accurate facts surrounding the alleged Misconduct.
- To establish accountability by determining who was involved in the alleged Misconduct.
- To determine the root causes of any proven violations so that internal controls and processes may be improved.
- To document the basis for disciplinary actions, where appropriate; and
- To show that proper inquiries were made concerning the Report.

The scope of an Investigation and the steps taken are tailored to the nature of the Report and the needs of the situation. Investigations are conducted objectively, professionally, and efficiently and completed in a timely manner.

The Legal Department will either conduct the Investigation or refer the matter to another key internal department to conduct its own inquiries. In some cases, it may be appropriate to engage outside counsel, auditors, or experts to assist in the Investigation. The Legal Department, however, retains primary responsibility for handling Reports, including Investigations of Misconduct.

Investigations will be conducted according to our [Protocol for Conducting Workplace Investigations](#).

We disclose information regarding an Investigation only on a need-to-know basis, as necessary to complete the Investigation or comply with applicable laws or regulations.

We maintain appropriate records to document the Report, the nature of the allegation, the Investigation, the findings, and any corrective actions recommended. These documents are considered confidential and maintained according to our document-retention guidelines.

Corrective action may be taken once the Investigation is complete, if warranted. While any action taken because of an Investigation will necessarily vary depending on the situation, our

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management should strive for consistency by utilizing sound practices and disciplinary protocols.

In some parts of the world, such as the European Union, there are specific rules and restrictions regarding how a Report may be made or if the Report affects someone in that jurisdiction. We will comply with those rules and restrictions when applicable.

Additional Duties and Prohibitions

We prohibit any form of retaliation, intimidation, or disciplinary action against anyone who makes a Report in Good Faith or participates in an Investigation, even if we ultimately conclude no Misconduct occurred. If you engage in retaliation or intimidation in violation of this Policy, you are subject to disciplinary action, up to and including termination of your employment.

If you make a Report which involves your own Misconduct, you will not be immune or otherwise protected from discipline or similar consequences.

If you make a Report that is not made in Good Faith, you will be subject to disciplinary action up to and including termination.

You are required to cooperate with an Investigation. You must make yourself available to Investigations immediately upon request, be fully forthcoming and truthful with investigators, and provide complete, accurate and truthful information (including tangible items such as documents).

If you attempt improperly to determine the identity of a Reporter who makes an anonymous Report, you may be subject to disciplinary action up to and including termination of your employment.

You may not take any action that would be reasonably likely either to compromise the Investigation or to negatively affect the status of anyone who may be involved in the Investigation.

Consistent with applicable law, anyone involved in the Investigation, such as witnesses, must exercise appropriate discretion regarding the subject matter of the Investigation. Similarly, anyone involved in the Investigation must be careful to avoid communication, outside of the Investigation process, of any information that may be construed as false, misleading, defamatory, or an invasion of privacy.



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Special Situations

In situations involving allegations of Serious Misconduct, as that term is defined in Appendix A to this Policy, the Legal Department will directly coordinate the Investigation.

When a Report is made regarding a member of the Legal Department, the involved team or team members will be removed from the investigation process to avoid any actual or potential conflicts of interest.

Enforcement

The Legal Department administers this Policy, the Ethics Helpline, the Investigation process, and other requirements under this Policy.

You are expected to be familiar with the procedures and responsibilities under this Policy. Employees who violate this Policy are subject to disciplinary action, up to and including termination.

REVISION HISTORY

This Policy replaces the Reporting, Investigations of Misconduct and Non-Retaliation Policy dated December 16, 2020.

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APPENDIX A

Misconduct Definitions

- (a) The several types of Misconduct are organized into two categories: Personal Misconduct and Financial Misconduct.
- (b) To ensure consistency in reporting, the category names used in Sections 2 and 3 should also be the category names used in any Investigation or Notification to describe the type of matter under Investigation.

2. Personal Misconduct

- (a) The following types of workplace wrongdoing are considered Personal Misconduct:
 - Conflicts of Interest: Someone made a business decision while allowing their personal loyalties to conflict or appear to conflict with the interests of Littelfuse. This includes hiring or supervising a relative, having a business or personal interest in a company vendor or competitor, or having some outside personal interest that conflicts with the interests of Littelfuse. This also includes outside employment that creates a conflict of interest.
 - Improper Competitive Practices: Improper sales and marketing practices such as unfair competition, unethical marketing practices, and making disparaging comments about competitors. An allegation of “unfair competition” includes discussing prices, strategies, or sales terms with competitors. It also includes agreements covering customers or territories. This category also includes obtaining competitor information in some improper way.
 - Improper Employment Practices: Someone acted improperly in the recruiting, hiring, evaluation, promotion, training, discipline, or compensation of an employee. This includes discrimination (race, color, gender, national origin, age, marital status, religion, disability, sexual orientation, veteran status, or other protected category under applicable law).
 - Improper Workplace Conduct: Someone behaved improperly while on company premises. This includes harassment, threats, theft of property, offensive speech

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(not using an internal system), improper employee relationships, and physical violence. This includes improper soliciting and distribution of material.

- **Misuse of Internal Company Systems:** Someone improperly used the company's telephone systems, voice mail, fax machines, computers, e-mail, teleconferencing services, copiers, internal data systems, or the Internet. This includes using the systems to send illegal, sexually explicit, abusive, offensive or profane messages. This also includes improperly uploading or downloading information. This also includes using company systems for soliciting funds or distributing information that is unrelated to company business.
- **Regulatory Non-compliance:** Someone did not follow a government rule or regulation. These rules and regulations include employee-verification requirements, visa and immigration rules, payroll and tax obligations, wage/hour laws, labor-law violations, stock-exchange, and other government rules.
- **Retaliation of Whistleblowers:** Someone who made a Good Faith Report of possible or actual Misconduct received some negative effect for making the Report.
- **Site Incident:** Someone acted improperly at a company location. This includes on-site illegal activity, theft, vandalism, and physical violence.
- **Violation of Confidential or Proprietary Information Rules:** Someone improperly lost, used or possessed information which Littelfuse is required to safeguard. This includes software piracy, improper data copying, and unauthorized use of someone's copyright or trademark rights. This also includes the improper disclosure of Littelfuse business plans, pricing data, marketing programs, personnel information, financial reports, and client-related information.
- **Violation of Health and Safety Rules:** Any failure to provide a safe working environment or training required by local law, regulation, or by company policies. This includes a failure to report accidents, job injuries, or illnesses in the workplace.
- **Violation of Internal Business Operations Rules:** Some business activity that violates established company policies, procedures, and practices. This includes allegations that someone intentionally did not follow internal manuals, standard business practices, or workplace health and safety procedures.

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3. **Financial Misconduct**

(a) The following types of workplace wrongdoing are considered Financial Misconduct:

- **Accounting Irregularities:** Someone, other than a member of the local Littelfuse office, did not follow internal accounting and financial-reporting rules.
- **Local Office Financial Violations:** A member of a local office staff did not follow established procedures for handling financial processes. This includes, for example, workers-compensation coding, wage/hour issues, handling of delinquent accounts, misstatement of office revenues and expenses, and misstatement of business transactions.
- **Fraud:** Someone intentionally deceived Littelfuse personnel or manipulated company processes to obtain financial gain, and this deception resulted in financial harm to the company. This includes, for example, expense-report fraud, falsifying financial records, embezzlement, and mishandling of company funds.
- **Improper Gifts, Gratuities and Entertainment:** Someone improperly accepted something of value from another person who is trying to influence a company business decision. This includes, for example, payments intended as kickbacks or bribes.
- **Insider Trading:** Someone illegally traded Littelfuse stock to his own advantage through having access to confidential information.
- **Money Laundering:** Someone used, or attempted to use, company systems or operations to “launder” the proceeds of a crime to make it appear as a normal business transaction.
- **Violation of Procurement Rules:** Someone did not follow established procedures relating to buying supplies or services for company use.

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4. Misconduct Notification Requirements

(a) Some Reports of actual or possible Misconduct have the potential to cause us considerable harm, even if the Report is later found to be unsubstantiated. These Reports require immediate reporting to the Legal Department to ensure they are handled appropriately to protect our interests. Such a Report is considered a “Serious Report.”

(b) A Serious Report of Personal Misconduct

(1) A Serious Report of Personal Misconduct includes one of the following conditions:

- The Report involves a member of the Littelfuse Board of Directors, a Senior Vice President, or Executive Vice President.
- The likely financial harm to the Company.
- Significant safety risk to employees.
- The substance of the Report is reasonably likely to create a significant risk to the Littelfuse reputation.
- The Report is likely to involve government authorities (including law-enforcement); or
- The Report involves a key Littelfuse customers;

(2) A Report of the following categories of Misconduct is considered a Serious Report regardless of the conditions described in subsection (1):

- Improper Competitive Practices (but only if the allegation relates to a violation of antitrust laws or international trade controls).
- Retaliation of Whistleblowers.
- Violation of Confidential or Proprietary Information Rules.

(3) A Notification to the Legal Department must be immediately escalated whenever a Serious Report of Personal Misconduct has been received by Littelfuse

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management.

(c) A Serious Report of Financial Misconduct

(1) A Serious Report of Financial Misconduct includes one of the following conditions:

- The Report involves a member of the Littelfuse Board of Directors, a Senior Vice President, or Executive Vice President.
- The likely financial harm to the Company.
- The substance of the Report is reasonably likely to create a significant risk to the Littelfuse reputation.
- The Report is likely to involve government authorities (including law-enforcement).
- The Report involves one of the key Littelfuse customers.

(2) A Report of the following categories of Misconduct is considered a Serious Report regardless of the conditions described in subsection (1):

- Accounting Irregularities.
- Improper Gifts, Gratuities and Entertainment (if the allegation relates to kickbacks or bribery).
- Insider Trading.
- Money Laundering.

(3) A Notification to the Legal Department should be immediately escalated whenever a Serious Report of Financial Misconduct has been received by Littelfuse management.

(d) Notifications for Reports not otherwise specified in this section should be made to the Legal Department within five business days after receipt.