



**Code of Conduct**

# Leadership Message



## A Message from Dave Heinzmann, President and Chief Executive Officer

Dear Associates:

Integrity is the foundation on which Littelfuse has built our reputation as a leading industrial technology manufacturing company empowering a sustainable, connected, and safer world. We hold our associates to high ethical standards every day as we continue to earn our reputation by maintaining the trust of our key stakeholders, which include our employees, customers, suppliers and investors. We build trust with each one of these stakeholders by:

- Employees: providing a safe and inclusive work environment.
- Customers: delivering superior products at competitive price.
- Suppliers: treating them fairly and honoring our commitments.
- Investors: being transparent with the business information we disclose to help them make intelligent investment decisions.

We understand that in today's environment, with the complexity of the worldwide laws and regulations governing our business operations, it is not always easy to know what is the right thing to do. The Littelfuse Code of Conduct serves as your resource guide to assist in making decisions consistent with the ethical and legal standards we hold ourselves and each other accountable for.

Please read the Code of Conduct, make sure you understand it, and do not hesitate to ask questions about it.

We are very proud of our reputation as a global company that maintains the highest ethical standards. With your help we look forward to maintaining and building upon this reputation in the years ahead.

Sincerely,

A handwritten signature in black ink that reads "Dave Heinzmann". The signature is fluid and cursive.

Dave Heinzmann



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**EVERYWHERE,  
EVERYDAY**



# Everywhere, Everyday

*“Littelfuse is committed to conducting our business with integrity, providing quality products and services to our customers and suppliers and serving the mutual interests of our associates, stockholders, and the communities where we live and work.”*

We are each responsible for the Littelfuse reputation. This Code of Conduct applies to all our directors, officers, and associates. It is expected that business conducted on behalf of Littelfuse will always be in accordance with accepted professional standards of conduct. This requires everyone to strictly observe all laws and to follow only the highest business and ethical practices in any area of the world where we do business. We expect similar conduct from our suppliers, consultants, and representatives who should all be furnished with a copy of this Code and required to comply with its applicable provisions.

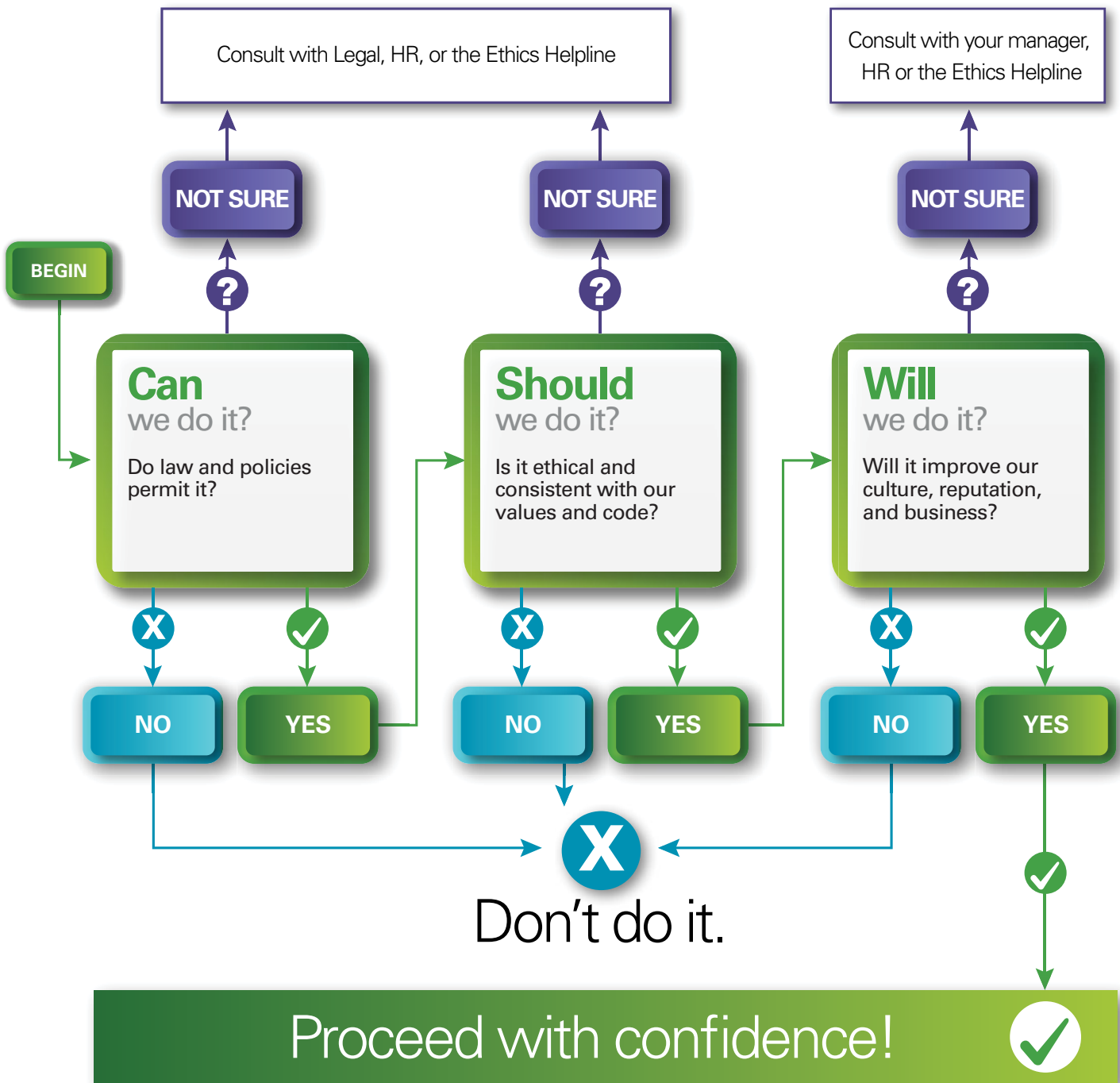
Littelfuse is committed to conducting our business with integrity; providing quality products and services to our customers and suppliers and serving the mutual interests of our associates, stockholders, and the communities where we live and work. This Code of Conduct does not discuss all possible situations, issues, or ethical dilemmas that you may encounter. Rather, it is intended to serve as a guide to our core ethics and standards and as an overview of where problems may arise. If you have any questions about the Code, its content, or the policies referred to herein, please contact a supervisor, the Human Resources Department, or the Legal Department.

## Ethical Decision-Making



# Ethical Decision-Making Chart

Making ethical decisions can be complex in a fast-paced, global work environment. When faced with an ethical dilemma, there are a few key questions, shown here, to keep in mind.



## Ethical Leadership

Leaders have a unique responsibility to set an example and serve as a positive role model to others at Littelfuse. We expect our leaders to inspire ethical behavior and further demonstrate integrity by:

- Advocating for speaking up
- Recognizing and rewarding integrity
- Promoting ethical decision-making
- Enforcing our non-retaliation policy
- Being an ethical role model

Any issue of misconduct should be managed in accordance with applicable company policies.



**Learn More:** Review our Manager Escalation Guidelines



The **Littelfuse Ethics Helpline** is a resource you can use to ask questions or report concerns confidentially or anonymously. This resource is managed by an independent third party and is designed to be used in situations where you may be uncomfortable reaching out to your supervisor or the Human Resources Department.

Ethics Helpline is available 24 hours a day, 7 days a week in multiple languages.

You can access this confidential reporting service and **Speak Up Today** using the details below.



**Online:** [littelfuse.ethicspoint.com](http://littelfuse.ethicspoint.com)



**Email:** [helpline@littelfuse.com](mailto:helpline@littelfuse.com)



**Phone:** Toll-Free 1-800-803-4135 (US)  
(telephone numbers for other countries are available  
on our Ethics Helpline website listed above)

Any person who seeks advice or raises a concern in good faith is doing the right thing. Retaliation against anyone who raises a concern in good faith will not be tolerated. "Good faith" does not mean you are right about your concern, but it does mean you honestly believe it to be true. Knowingly making a false accusation is a violation of this Code and could result in disciplinary action.

## Anti-Retaliation

Littelfuse will not take any adverse action against anyone as a result of their good faith report or concern. Retaliation against anyone who honestly reports a concern about possible violations, including illegal or unethical conduct, will not be tolerated and will be cause for disciplinary action, up to and including termination of employment. Associates reporting issues of misconduct in good faith are protected from adverse employment actions including:

- termination
- loss of promotion
- threatening behavior
- harassment of any kind
- discrimination of any kind

We have a zero-tolerance policy for retaliation of any kind. Protection for good-faith reports is guaranteed by our policies and this Code of Conduct.

Any associate may report retaliation anonymously, unless prohibited pursuant to applicable laws, by using our Ethics Helpline.

Similarly, the submission of allegations without a good faith basis for doing so, particularly where they may harm the reputation of an associate, is itself a serious offense which will not be tolerated and will be cause for disciplinary action, up to and including termination of employment.

**Learn More:** Review our Reporting, Investigations of Misconduct, and Non-Retaliation Policy and visit our Ethics Helpline website







# OUR PEOPLE



# Our People

*“We believe in dignity and respect for everyone. This means we are committed to providing a workplace free from unlawful and improper harassment and other inappropriate behavior.”*

## Health and Safety

We prioritize maintaining a safe working environment across our global locations, ensuring our employees, contractors, and visitors stay healthy and safe. Our manufacturing and distribution operations are held to high standards to meet or exceed compliance with applicable Environmental and Health & Safety regulations.

Each employee has a responsibility to make workplace health and safety a priority. We hold each other responsible for following the safety and health rules and practices that apply to our jobs and take precautions to protect ourselves, each other, and our visitors. This accountability includes immediately reporting accidents, injuries, and unsafe practices or conditions so that appropriate and timely action can be taken to correct known unsafe conditions.

**Learn More:** [Review our Safety Policy](#)

Do your part to help us build an accident- and injury-free workplace by being cautious, reporting any potential problems and putting your safety and the safety of others first.

## Anti-Harassment and Anti-Discrimination

We believe in dignity and respect for everyone. This means we are committed to providing a workplace free from unlawful and improper harassment and other inappropriate behavior. Actions such as offensive or disrespectful conduct, unwelcome verbal or physical conduct of any kind and intimidating and offensive behaviors are not tolerated. It is always important to remember that harassment, sexual or otherwise, is determined by your actions and how they are perceived by others, regardless of your intentions.

In addition to ensuring a harassment free workplace, we are committed to embracing our differences and preventing discrimination. Discrimination is wrong and unlawful. We do not tolerate discrimination based on factors such as race or color, sex, religion, age, gender identity and expression, disability, sexual orientation, pregnancy, veteran status,

marital or family status, citizenship, national origin or ethnicity, political affiliation, protected genetic information or any other characteristic protected by law or regulation.

If you witness behavior that may be discrimination, harassment, or bullying, speak up. You may talk to your manager, a Human Resources representative, and you may share your concerns through our Ethics Helpline. Every report of perceived discrimination or harassment is taken seriously.

**Learn More:** Review our Harassment Free Workplace Policy



## Workplace Violence and Substance Abuse

To ensure we maintain a healthy and safe work environment, associates should never work under the influence of illegal drugs. Possessing illegal drugs on Littelfuse property is strictly prohibited. On occasion, alcohol may be served at Littelfuse functions, such as company picnics or holiday parties. Responsible, moderate consumption of alcohol at these events is allowable, but we should know our limits and never drink to excess, and take steps to ensure that impaired individuals do not harm themselves or others.

We also do not tolerate violence, threats of violence, or bullying of any kind. The possession of weapons on Littelfuse property is prohibited, including when the owner has a lawful permit to carry such weapon. Intimidating or hostile behavior, acts of vandalism, or offensive comments or behavior are also prohibited and may lead to disciplinary action, up to an including termination of employment.

## Diversity, Inclusion and Equal Opportunity

We succeed when everyone feels free to contribute their unique perspectives. Supporting diversity, inclusion and equal opportunity means we embrace each team member and ensure we give fair treatment and equal opportunity to all. Each of us have a responsibility to create a culture that embraces and encourages diversity of thought, experience, skills, and backgrounds. This culture enables us to grow and innovate as our diverse perspectives make us stronger.

Littelfuse is proud to be an Equal Opportunity and Affirmative Action employer and we abide by all global requirements to ensure we make hiring and promotion decisions based on fair, unbiased evaluation of skills, work history, and performance. Our commitment to diversity and inclusion is supported by our stance against discrimination and our belief that individuals of all different backgrounds contribute to our success. We strive to attract, retain, and develop a workforce that is as diverse as the end markets and customers that we serve.

### Diverse People. Bold Solutions. Sustained Success.

Our success is dependent upon fostering a workplace where different perspectives, experiences and ideas come together to create new value.



## Conflicts of Interest

We must act with honesty and integrity and avoid any situation that may involve an actual or perceived conflict between our personal interests and the interests of Littelfuse. Every director, officer and associate has a responsibility to avoid any activity or relationship that may interfere with, or appear to interfere with, their independent judgment and objectivity on the behalf of Littelfuse.

To avoid situations that may create a conflict of interest or the appearance of a conflict, use caution when dealing with employment outside Littelfuse, personal relationships, (including friends and family), gifts and hospitality, personal investments and loans or favors to or from others.



Your voice matters.

**Potential Conflicts of Interest:** a situation that may develop into, or has the potential to become an actual conflict of interest.

**Apparent Conflicts of Interest:** a situation where a reasonable person would think someone's judgment is likely to be compromised.

**Actual Conflicts of Interest:** a situation where financial or other considerations compromise someone's objectivity, professional judgment, integrity, or ability to do their job.

### Did you Know?

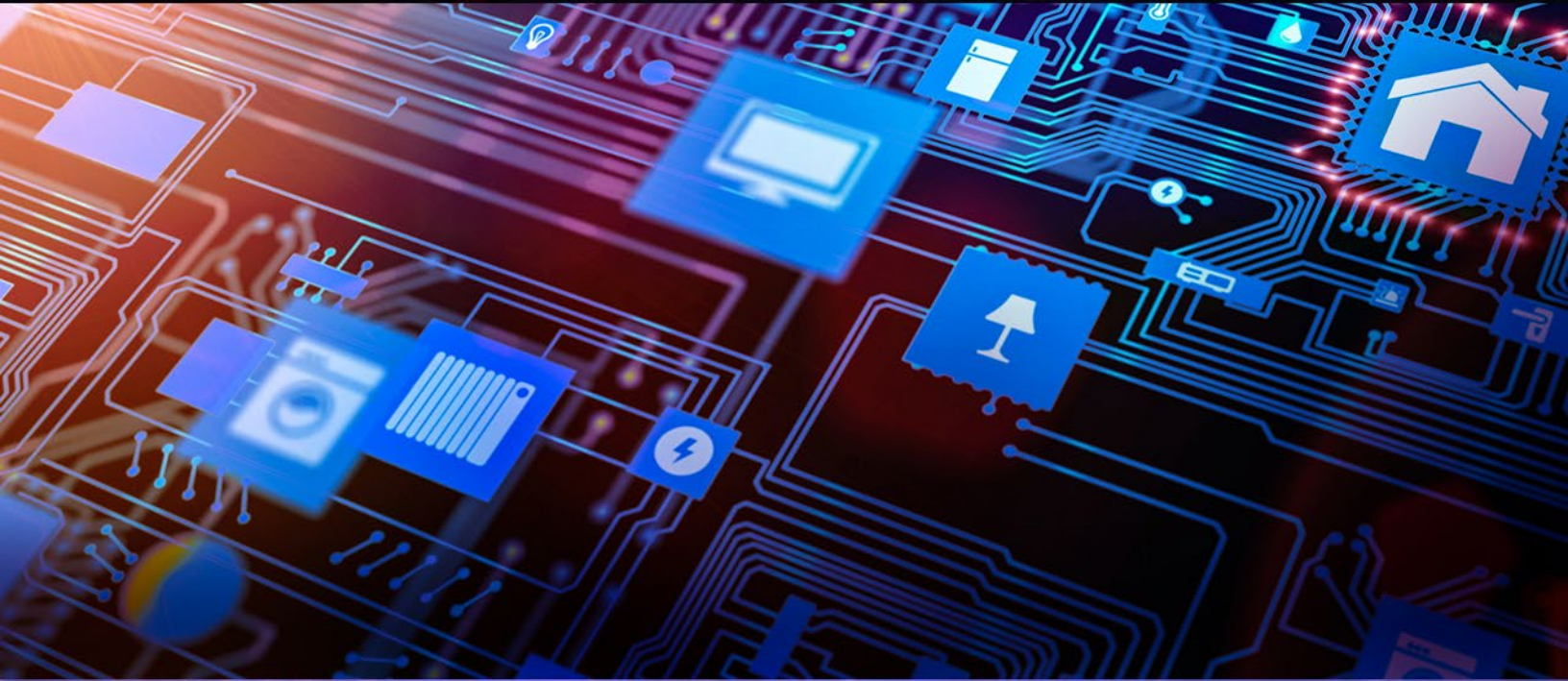
- A second job may interfere with your work at Littelfuse - talk to your manager before taking on a second job.
- Running for public office should be disclosed - talk to your manager.
- Sometimes disclosing a conflict is enough to resolve it. When in doubt - talk to your manager.

## Reporting Misconduct and Investigations

We must all do our part to maintain a workplace with integrity, and that means reporting conduct that does align with our Company's values. As the right thing to do may not be clear in all situations, you should always speak up if you are unsure about a situation and need advice, if you truly believe someone is doing or about to do something that would violate the law or the Code, or if you believe you may have witnessed or been involved in misconduct.

Any violations or concerns about this Code should be promptly reported to any manager, Human Resources representative, the Legal Department, or the Ethics Helpline. The Ethics Helpline is available 7-days per week, 24-hours per day. Telephone numbers for the Ethics Helpline are posted in our facilities, on the intranet, and on our reporting website: <https://littelfuse.ethicspoint.com>. Any retaliation against any director, officer, or associate who reports any suspected misconduct in good faith is strictly prohibited.

**Learn More:** Review our Reporting, Investigations of Misconduct and Non-Retaliation Policy



# OUR BUSINESS





# Our Business

*“We compete solely on the merits and prices of our products and services...”*

## Anti-Bribery and Corruption

Bribery and corruption can hurt individuals, organizations, and societies, and they go against our commitment to do business with integrity. We expect that all of our associates and representatives and other third-parties acting on our behalf only use legitimate and ethical sales practices. We compete solely on the merits and prices of our products and services and prohibit bribery and corruption in the conduct of our business. As we do business all over the world, we are subject to the laws of multiple countries relating to bribery and corruption and must avoid even the appearance of taking improper actions.

Under no circumstances may an expenditure or payment be made either by us or on our behalf which could reasonably be construed as an improper inducement to the recipient to corruptly perform some governmental or business act for our benefit. We strictly prohibit offering, giving, requesting, or receiving any form of bribe or kickback or using one’s position at Littelfuse to do so. As there is heightened risk posed when dealing with government officials, all associates should use additional caution when engaging with governmental officials.

Another serious form of corruption is money laundering, or the hiding of the illegal origin of money in a transaction. Money laundering supports criminal activities and our employees should ensure we do our part to identify suspicious transactions, including third-party screening, transaction monitoring, and reporting any suspicious activity.

### Bribes in different forms:

- Kate promises an all-expense-paid trip to Paris to persuade a customer to renew a contract
- Don offers a government official an envelope of cash to win a supply contract
- Juan makes a small payment to a customs official to speed up a shipment

### Learn More:

Review our  
Anti-Bribery Policy

## Fair Competition

We believe that our innovative solutions set us apart from our competition and we will never cheat, steal, or capitalize on an unfair advantage. Fair competition delivers great benefits to our stakeholders, and we are committed to complying with competition and antitrust laws everywhere we do business.

Prohibited behaviors:

- Any kind of agreement with competitors or customers to control or fix prices or to boycott customers or suppliers
- Any arrangement with competitors to allocate territories, markets, or products, or to control the flow of products
- Use of any illegal or unethical method to gather competitive information, including obtaining proprietary information through illegal means or inducing improper disclosures of information from past or present associates of other companies

## Gifts and Gratuities

Business gifts, favors, meals and entertainment can interfere with the conduct of a sound and objective business relationship. These therefore need to be approached with caution. Professional judgement should be used to determine whether a gift is permissible in any given circumstance, but should never be used to influence a person's decision. In certain instances, business gifts that are infrequent, non-cash and of nominal value may be appropriate.

All such expenditures must be authorized and documented in accordance with our policies.

Taking a customer out to a modest dinner to celebrate a signed contract is an appropriate gift but taking the customer to a lavish dinner to encourage them to sign a contract may be considered a bribe. Remember: a gift is given with no expectation of a reward.







## Trade Compliance

We comply with trade regulations in each country where we operate. We all have the responsibility to be aware of export controls and relevant regulations that guide us on how to transfer material, equipment, technology, information, and services outside the country we operate. These regulations may prohibit exports of certain products or transfers of data and can change frequently. Sometimes, there is a license or authorization required to ship products or to conduct business in certain countries or with certain parties.

Associates involved in such transactions should consult the Trade Compliance Team with any doubts or concerns, as penalties for violating trade regulations can be severe.

**Learn More:** Review our Export Compliance Policies

Always consult Trade Compliance when dealing with new product lines, doing business in a new country, or with new third parties.

## Protection and Proper Use of Company Assets

Being a good steward of Littelfuse assets means protecting them from loss, damage, misuse, waste, or theft. Littelfuse assets should be properly maintained and only used for business purposes or other purposes approved in advance that do not distract from performing our professional responsibilities. Company assets may never be used for illegal or unauthorized purposes. Similarly, such assets should not be used for personal benefit or conducting your own business, including personal use of Littelfuse-issued credit cards or computer software.

**Learn More:** Review our Information Technology Usage Policy

Company assets include:

- Informational assets such as a customer database
- Financial assets such as our company-issued credit cards
- Tangible or physical assets such as our computers, phones and machinery
- Intangible assets such as our product designs, ideas, and intellectual property



## Political Spending and Lobbying

We encourage our employees to actively participate in their communities, which may include various political activities. However, employees may never use Littelfuse funds or resources, or receive reimbursement from Littelfuse, for personal political activities. These activities include contributions to political candidates or events. Decisions to contribute time or money to a political community or activity are personal and voluntary.

Further, Littelfuse is committed to compliance with applicable laws related to relationships with governmental agencies and individuals, and corporate political contributions are strictly regulated and require approval from the Legal Department.



# OUR CUSTOMERS



# Our Customers

*“Our information technology systems are a critical component of our business operations, and we are all responsible for protecting the information we are entrusted to maintain.”*

## Protecting Privacy

Littelfuse respects and protects the privacy and security of the personal data provided to us by our employees, customers and other third parties we do business with. To support this commitment, we have implemented procedures to responsibly collect, store, use, transfer and dispose of personal data in compliance with applicable privacy and data protection laws.

Personal Information may include:

- Social security and other government identification numbers
- Medical information
- Email addresses
- Telephone numbers
- Home addresses
- Credit card information
- Consumer credit information
- Names and other information regarding family members

**Learn More:** Review our Privacy Policy and our Data Protection and Classification Policy

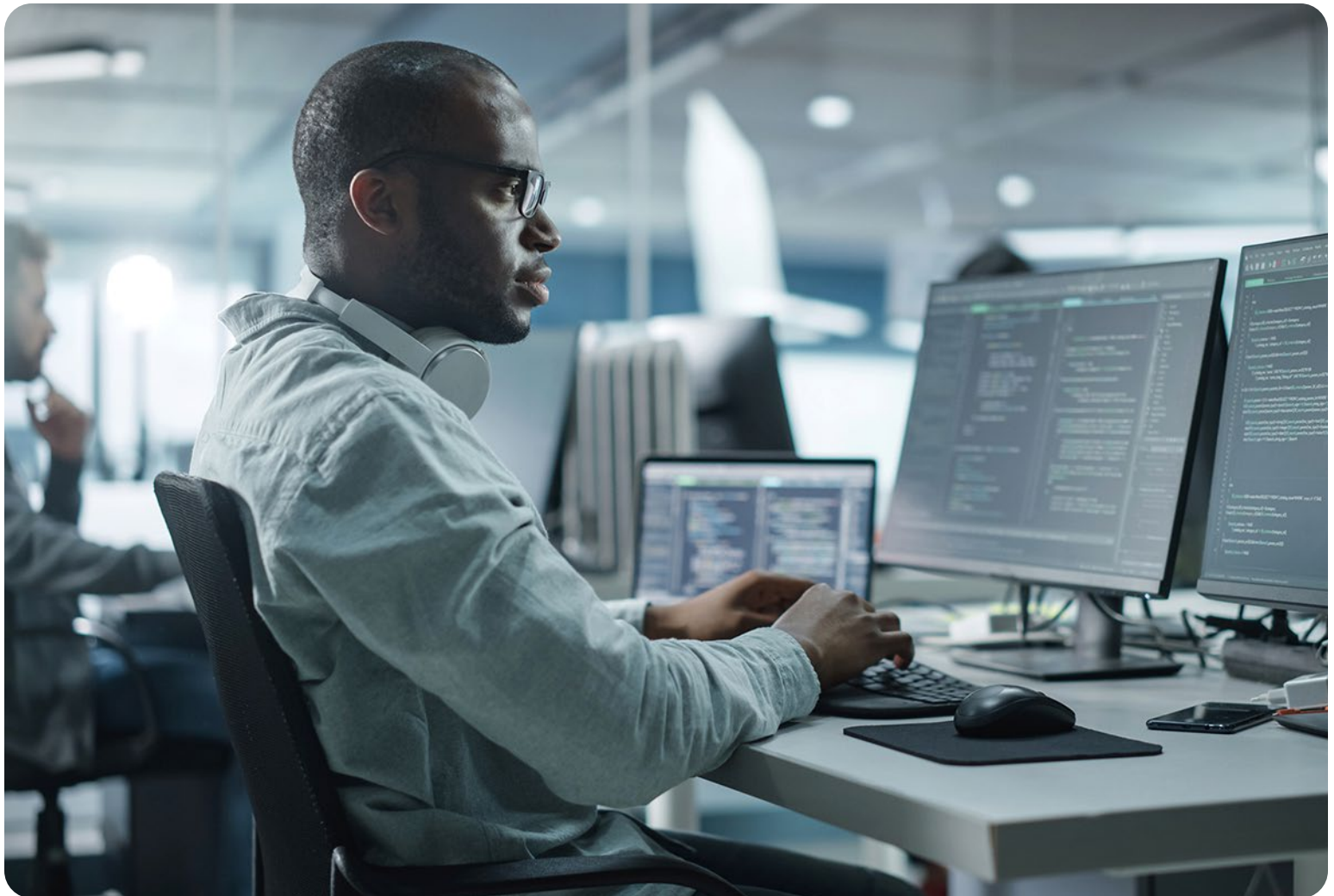
## Information Security

Our information technology systems are a critical component of our business operations, and we are all responsible for protecting the information we are entrusted with. Each employee should understand how to protect our Company and customer information. Being mindful of information security is our best way to protect against loss, theft, or misuse of information. We must take necessary precautions to secure computers, passwords, and other technology from improper use and access.

Limited personal use of Littelfuse phone, email, and the internet are acceptable unless it:

- Relates to outside business interests
- Interferes with an employee's work performance or that of others
- Requires a large amount of time or resources
- Involves illegal, sexually explicit, political, discriminatory, or otherwise inappropriate material
- Violates our Code of Conduct or other policy

**Learn More:** Review our Information Technology Usage Policy





**Take Action:**

- Reduce waste by reusing products and recycling whenever possible, whether at work or home
- Be mindful of the products used and services purchased to leave a smaller footprint on the planet
- Support an ethical supply chain by screening third-parties for fair labor practices
- Follow all relevant company policies and support our sustainability goals

## Environmental and Social Responsibility

Our everyday decisions and actions matter; not only for the impact we have on our company's success, but also our impact on our environment and communities. We prioritize and continuously work to improve social, ethical, and environmental conditions wherever we operate.

As part of our sustainability program, we have implemented various initiatives that apply across our organization and to our suppliers. These programs are based on our Core Values and are integrated into our company culture to uphold the highest level of integrity.

**Learn More:** Review our latest Sustainability Report



# OUR INVESTORS

200,000	1.90	▲
15,000	25.25	▲
100,000	100.31	▲
50,000	50.03	▲
1,000,000	0.28	▲
500,000	1.03	▲
25,000	0.98	▲
30,000	105.53	▲
500,000	20.32	▲
30,000	403.15	▲
300,000	10.10	▲
4,000,000	0.12	▲
300,000	1.53	▲
150,000	2.88	▲
100,000	6.03	▲
50,000	202.14	▲
30,000	600.10	▲

# Our Investors

*"Honesty, fairness, and transparency are at the foundation of an integrity-based culture."*

## Accurate Recordkeeping and Fraud

Honesty, fairness, and transparency are at the foundation of an integrity-based culture. We keep accurate records with complete, fair, accurate, timely and understandable information related to our business transactions. We further have an obligation to share accurate information with our investors, including all reports and documents required to be submitted to any governmental agency, and all our public communications.

Misrepresentation, deception, cheating or stealing all constitute fraudulent behaviors that are not tolerated at Littelfuse. Company funds or assets may not be used for any unauthorized or unlawful purpose. We must ensure that we are honest with all information reported on time sheets and expense reports and that our accounting practices are never misrepresented. Immediately report any unusual or suspicious activities or transactions to the Legal Department or through our Ethics Helpline.

### Your Role:

- Never use legitimate receipts for non-business activities, such as taking a friend to dinner, then submitting the expense as a business dinner
- Never overstate expenses or time worked
- Record all assets, liabilities, revenues, expenses and business transactions in a timely manner
- Use thoughtful, appropriate, and accurate wording when creating records
- Maintain and destroy company records in accordance with retention policies



## Investor Relations

Members of the investing community depend on us to provide reliable information about our business operations, performance and outlook. It is essential that we not provide “special” or favored treatment to some. Littelfuse is legally required to provide all members of the public equal access to material information.

Only authorized personnel should communicate with the investment community and any discussion with the investment community except when participating with authorized individuals must be avoided. If you are contacted by a member of the investment community refer them to contact our Investor Relations Team.



## Social Media



Pause before posting. Stop and think. Do you want that comment on the internet forever?

Respectful and responsible use of social media builds trust with our stakeholders, promotes our integrity-based culture, and strengthens our company’s reputation. Social media represents an opportunity for us to share our mission, product and service information as well as hire new talent, build business relationships and connect with stakeholders. We expect all associates to use sound judgement in compliance with our policies, and to behave fairly, constructively, and with tact, especially when discussing a sensitive topic.

**Learn More:** Review our Social Media Policy

## Proprietary and Confidential Information



Certain information is critical to our company's success and must be kept private. Examples of such information that must be kept confidential includes product designs, customer lists, and pricing policies. Each of us has a responsibility to take precautions to never disclose proprietary, personal or confidential information of Littelfuse or of our associates, suppliers and customers without proper authorization. This obligation continues after employment or service with Littelfuse ends. We should also be careful to respect the intellectual property rights of others and take precautions to never infringe on valid patents, trademarks, or other confidential information.

**Learn More:** Review our Information Technology Usage Policy

## Insider Trading

As a publicly-traded company, we must keep in mind the importance of when and how we share information. Our securities, or the securities of companies we do business with, may never be bought or sold when we have material, non-public information. Information is material and non-public if it hasn't been broadly released and if a reasonable investor would consider it important in deciding whether to buy, hold, or sell a security.

Insider trading involves improperly using material, non-public information to buy or sell shares or other securities. The rules around using such information and about trading in Littelfuse securities are covered by our Insider Trading Policy. When it comes to trading securities, we should avoid even the appearance of improper behavior, so all associates are expected to be aware of and comply with the Insider Trading Policy.

**Learn More:** Review our Insider Trading Policy



Excited about an upcoming acquisition, and want to share the information with a friend before Littelfuse announces it publicly? When in doubt – keep it private. You may have access to material, non-public information and we are counting on you to protect the wellbeing of financial markets, other investors, and our reputation.



# CODE OF CONDUCT ADMINISTRATION



# Code of Conduct Administration

## Mandatory Adherence to Code of Conduct and Training

Adhering to our Code of Conduct and applicable training requirements is a condition of continued employment. Violations of this Code may subject a person to disciplinary action ranging from a reprimand to dismissal, loss of any applicable bonus compensation, and possible criminal prosecution.

Upon initial hire, and subsequently on an annual basis, our associates are required as a condition of employment to complete training on and to acknowledge that they have read and understand our Code of Conduct. This acknowledgment will further require associates to confirm that they have complied with, and are not aware of, any violations of our Code.

## Waivers and Amendments

The Board of Directors reserves the right to amend any provisions of the Code of Conduct and will make available any waivers thereof.