



Expertise Applied | Answers Delivered



LITTELFUSE
CODE OF
CONDUCT





A Message from Dave Heinzmann, President and Chief Executive Officer

Dear Associates:

Integrity is the foundation on which Littelfuse has built our reputation as the Global Leader in Circuit Protection, and we remain committed to maintaining the highest standards of conduct and business ethics. Our Core Values: Customer Focus, Teamwork, Results Driven, Integrity and Innovation guide every conversation, decision and interaction for our business. We hold our associates to these values and to exemplify these high standards every day. We understand that in today's business environment with the complexity of the worldwide laws and regulations governing our business operations, it is not always easy to know the right thing to do. The Littelfuse Code of Conduct serves as your guide to the ethical and legal standards to which we hold ourselves and each other accountable.

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

If you believe at any time that your conduct or that of another colleague could be viewed as a violation of the Littelfuse Code of Conduct, it is important that you immediately advise your supervisor, your local human resources representative or another Company manager. If you would feel more comfortable raising the concern anonymously, you are encouraged to call the Littelfuse Ethics Helpline.

We have a zero-tolerance policy for ethical violations; our dedication to a principled workplace, where we respect one another, our customers, investors and business partners is critical to our continued success.

We are very proud of our reputation as a global company that maintains the highest ethical standards, and with your help we look forward to continuing this tradition in the years ahead.

Sincerely,

A handwritten signature in black ink that reads "Dave Heinzmann". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Dave Heinzmann

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OUR CORE VALUES

The power of Littelfuse starts with our Core Values: Customer Focus, Teamwork, Results Driven, Integrity and Innovation. These five values are more than just words to us. They are the foundation of our working relationships both internally and externally.

We are all responsible for the Littelfuse reputation. This Code of Conduct applies to all our directors, officers and associates and it is expected that business conducted on behalf of Littelfuse will be in accordance with accepted professional standards of conduct, strictly observe all laws, and 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 contract representatives. Major suppliers, representatives, and consultants should be furnished with a copy of this Code and encouraged 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 do business. This Code of Conduct does not include all possible situations, issues, or ethical dilemmas that you may encounter, but is intended to serve as a guide to our core ethics and standards and as an overview of areas where problems may arise. If you have any questions about the Code, its content, or the policies referenced herein, please contact a supervisor, the Human Resources Department, or the Legal Department.

ACKNOWLEDGEMENT

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

AMENDMENTS

The Board of Directors reserves the right to amend any provisions of the Code.

CUSTOMER FOCUS



Anti-Bribery and Corruption

We expect that all of our associates and representatives, including our officers, sales personnel, foreign and domestic sales representatives, agents, distributors, consultants, joint venture partners and other third-parties acting on our behalf will obtain or retain business for Littelfuse using only 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 as they relate to bribery and corruption and we must avoid even the appearance of taking improper actions.



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[Review our Anti-Bribery Policy.](#)

Fair Competition

Littelfuse strongly supports principles of fair competition and is committed to compliance with trade and antitrust laws everywhere we do business. Any kind of agreement with competitors or customers to control or fix prices or to boycott customers or suppliers is prohibited. Any arrangement with competitors to allocate territories, markets, or products, or to control the flow of products, is prohibited. No director, officer or associate may use any illegal or unethical method to gather competitive information, including obtaining proprietary information through illegal means or inducing disclosures of past or present associates of other companies.

Example

Q: A local consultant reports that there are unexpected issues with obtaining a business license but offers to settle the issue for a small upfront payment. Is there a problem with this?

A: Yes. This proposal may constitute the payment of a bribe.

Example

Q: My co-worker recently started at Littelfuse after former employment with one of our competitors. She has a customer list and price list from her prior company and says that she is planning to use it to our advantage. Should I just ignore this and let her do what she wants with the information?

A: No. Use of the competitor information would be improper. In addition, if an associate retains competitor information it can result in legal action by the competitor against Littelfuse. You must report this to the Legal department or through the Ethics Helpline.

CUSTOMER FOCUS



Gifts and Gratuities

Business gifts, favors, meals and entertainment can interfere with the conduct of a sound and objective business relationship, and 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 some 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.

Example

Q: What should I do if I receive a gift that I shouldn't keep?

A: You should notify your manager. The gift can be returned to the giver or shared amongst a Department or donated to a charity supported by Littelfuse, as appropriate.

Global Business Operations

All directors, officers, and associates must respect the laws, customs, and traditions of each country in which we operate. You should be aware that U.S. regulations may apply even for business activities that are conducted outside the United States. For example, all of the Littelfuse worldwide operations are subject to the import and export control regulations of the U.S. and other countries where we do business. These regulations may prohibit exports of product or transfers of data and can change frequently. Anyone involved with such exports must maintain a current understanding of the regulations and consult the Trade Compliance Manager with any doubts or concerns, since penalties can be severe.

Each of us is responsible for knowing and following the laws that apply where we work and to our responsibilities. If you have any questions about the prevailing laws that apply to your activities, you should always contact the Compliance Manager.



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[Review our Import and Export Compliance Manuals.](#)

Example

Q: I overheard some engineers discuss an upcoming technical / sales proposal with foreign customers. I suspect the products and technical data may be export-controlled and mentioned to my boss that a disclosure to the customer could be an export violation. He told me that the competitor would win the business if we don't meet the submission deadline. What should I do?

A: If you suspect that there is a violation you have an obligation to share your concerns. Seek guidance from the Trade Compliance team or submit a report directly to our Ethics Helpline.

CUSTOMER FOCUS



Government Contracts

The laws of the countries in which we operate may sometimes have differing standards or practices relating to payments to government officials. Even though it may be local practice or custom to allow certain payments, it is our policy to prohibit unauthorized payments to anyone, anywhere in the world, for any reason. Under no circumstances may an expenditure or payment be made 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.



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[Review our Anti-Bribery Policy.](#)

Example

Q: I work with a foreign agent and suspect that some of the money that we pay them goes toward making payments or bribes to government officials. What should I do?

A: The matter should be immediately reported to the Legal Department or the Ethics Helpline for investigation. If there is bribery and we fail to act, both you and Littelfuse may be liable. While investigating these types of matters may be culturally difficult in some countries, any agent doing business for us should understand the necessity of these measures.

TEAMWORK



Anti-Harassment, Violence and Substance Abuse

We are committed to providing a workplace free from unlawful and improper harassment and other inappropriate behavior. Further, violence of any kind is not tolerated at Littelfuse, including intimidating or hostile behavior, acts of vandalism, carrying weapons on Company property or offensive comments regarding violent events or behavior. It is the responsibility of every manager and every associate to help us reach this goal. Substance abuse negatively impacts job performance and can create safety hazards that may put others at risk. We strictly prohibit drug and alcohol use at every Littelfuse location.



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[Review our Harassment Free Workplace Policy.](#)

Example

Q: I overheard co-workers discussing political issues and opinions that made me feel uncomfortable. How should I handle this situation?

A: Political discussions typically do not have a place in a workplace that values respect for our associates as they may feel uncomfortable and fearful to express an opposing position. Respond directly to the co-workers that you are not comfortable with the discussion and if it continues, that you will report it. If you do not feel comfortable directly addressing the issue, please report to HR or to the Ethics Hotline.

Data Privacy

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



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[Review our Global Employee Personal Data Protection Policy.](#)

Example

Q: What is personal information?

A: Personal information is any information related to a natural person that can be used to directly or indirectly identify that person. Examples of personal data include: Name, birthdate, social security or national identification number, career development plans, evaluations, and personal data such as emails, files, log files or test results that can be linked back to a person when not anonymized.

TEAMWORK



Diversity and Equal Opportunity

A diverse and motivated workforce is vital to our success. We are committed to providing our associates with fair treatment and equal opportunity. Littelfuse prohibits discrimination based on age, ethnicity, gender, disability, marital or family status, national origin, race, religion, sexual orientation or any other legally protected status.

Example

Q: I believe that I did not receive the promotion that I have earned because of my age, but I am not certain. How can I express my concerns without accusing my manager of discrimination?

A: Littelfuse bases all employment decisions on merit and without regard to the age of the candidate or associate. If you suspect that you were treated unfairly, discuss the situation with a member of the Human Resources team or submit a report to the Ethics Helpline.

Environment, Health and Safety

We hold our manufacturing and distribution operations to high standards to meet or exceed compliance with applicable Environmental and Health & Safety regulations. We strive to conduct business in a manner that protects the environment and ensures the safety and welfare of our associates, customers and neighbors.



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[Review our Environment, Health & Safety Policy.](#)

Example

Q: Are contractors expected to follow the same health, safety and security policies and procedures as associates?

A: Absolutely. Littelfuse associates are responsible for ensuring that contractors and vendors that work on our premises understand and comply with all applicable laws and regulations governing the particular facility, as well as any Littelfuse-specific policies.

TEAMWORK



Reporting and Enforcement

Any violations or concerns about this Code should be promptly reported to any supervisor, the Human Resources Department, the Legal Department or the Ethics Helpline. Adherence to this Code is a condition of continued employment. Violations of this Code may subject a person to disciplinary action ranging from a reprimand to dismissal and possible criminal prosecution.

As directors, officers, and associates, we must all do our part to maintain a workplace with integrity. Although not all situations can be foreseen, 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 been involved in misconduct.

You may always call the Ethics Helpline. Phone numbers for the Ethics Helpline are posted in our facilities, on the intranet, and can be obtained from your local Human Resources department. Any retaliation against any director, officer, or associate who reports any suspected misconduct in good faith is strictly prohibited.



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Review our [Ethics Helpline and Reporting Process Policy](#).

Example

Q: Our manager typically does nothing when concerns about potential misconduct are brought to her attention and I believe that she makes things difficult for people who raise issues. How do I report expected misconduct if I am not comfortable going to my manager or HR?

A: The right thing to do is to take action and speak up! Starting with you manager is often the best way to efficiently address concerns. However, if you do not believe that is appropriate or feel comfortable doing so, you may report your concern through our Ethics Helpline or to another manager or senior executive.

RESULTS DRIVEN



Accurate Recordkeeping

Our business records must be maintained in a manner that accurately reflects the underlying transactions. We must provide full, fair, accurate, timely and understandable information in all reports and documents required to be filed with, or submitted to any governmental agency and in any public communication made by Littelfuse. Any false entries, suspected mishandling of accounting or recording practices or misuse of our funds or property must be reported to the Legal Department or through the Ethics Helpline.

Example

Q: At the end of the last quarter reporting period, my manager asked me to record additional expenses even though I had not yet received the invoices from the supplier and the work had not yet started. I agreed to do it, mostly because I didn't think it really made a difference since we were all sure that the work would be completed in the next quarter. Now I wonder if I did the right thing.

A: No, you did not. Costs must be recorded in the period in which they are incurred. The work was not started and the costs were not incurred by the date you recorded the transaction. It was therefore a misrepresentation and, depending on the circumstances, could amount to fraud and/or a violation of accounting and record keeping requirements.

Fraud

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 timesheets and expense reports and that our accounting practices are never misrepresented. Immediately report any unusual or suspicious activities or transactions.

Example

Q: While traveling on business, I contacted my cousin who lives in the area. We went out for dinner and my cousin suggested that I charge our meal to my corporate card and expense it. Can I do that?

A: No, tell your cousin that while you can expense your meal, you cannot expense his or her meal because it is not a business-related meal. You have a responsibility to be honest and accurate on your expense reports.

RESULTS DRIVEN



Investor Relations

Members of the investing community depend on us for providing reliable information about our business operations, performance and outlook. It is essential that we not provide “special” or favored treatment to some. The policies of Littelfuse require that we 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 any associate is contacted by a member of the investment community, he or she should refer them to contact Corporate Communications.



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[Review our Regulation FD Policy.](#)

Social Media

Social media represents an opportunity for us to evolve our methods and style of interaction with customers, vendors, business leaders, media, associates, etc., as well as expand and deepen such interactions. We expect that our associates will use sound judgment in compliance with our policies in all professional interactions.



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[Review our Social Media Policy.](#)

Example

Q: If I am asked to comment on the financial outlook of Littelfuse by one of our investor’s analysts, may I give my opinion if I state it as such?

A: No. You may not provide comments or personal opinion to the investment community, or the media, without approval from Corporate Communications. You should refer all questions for information, without comment, to Corporate Communications.

Example

Q: I have a blog where I talk about my life and my work. Should I be concerned about what I say about my job?

A: Keep in mind that you must always protect proprietary information about Littelfuse and confidential information about our customers and other companies with which we do business. You are personally responsible for the content that you publish online – never assume that your posts are private.

INNOVATION



Proprietary and Confidential Information

We must actively 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 with or service to Littelfuse terminates. We further respect the intellectual property rights of others and will take precautions to never infringe on valid patents, trademarks and other intellectual property rights of others.



LEARN MORE

[Review our Information Safeguards Policy.](#)

Example

Q: I had been waiting for an email from a potential client – she is sending a form which I need to fill in for a proposal that I am preparing. When the e-mail finally arrived and I opened the attachment, I realized the sender mistakenly attached a confidential business proposal from another company – a competitor competing for the same business that I am working on. What should I do?

A: Report the mistake immediately to your manager. Your exposure to another company's confidential information could put Littelfuse at risk. Remember that we do not use confidential information that we received mistakenly or wrongfully. It should be deleted or returned.

Protection and Proper Use of Company Property

Littelfuse property should always be protected from loss, damage, misuse, waste, or theft. Littelfuse property should be properly maintained and only used for business purposes and other purposes approved in advance by management. Littelfuse property may never be used for illegal or unauthorized purposes. Similarly, it may never be used for personal benefit, including personal use of Littelfuse-issued credit cards, computer software or conducting your own business.



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[Review our Information Technology Usage Policy.](#)

Example

Q: I noticed a co-worker taking office supplies home. When I asked him about it, he said, "It's no big deal – we have so many supplies, the Company won't ever use them all." What should I do?

A: Speak up! Any acts of theft or conduct that violates our Code should always be reported.

INTEGRITY



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 others.



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[Review our Related Party Transactions Policy.](#)

Example

Q: If I suspect someone has received a kick-back from one of our suppliers, what should I do?

A: The receipt of a kick-back from a supplier may create a conflict of interest or the appearance of a conflict that may impair the recipient's independent judgement and objectivity. You should contact your manager, local HR, Legal Department or report the matter directly to our Ethics Helpline.

Insider Trading

Littelfuse securities or securities of another company with which Littelfuse does business may never be bought or sold when we have material, non-public information about Littelfuse or such other company. Disclosing such information to anyone, other than in accordance with our Insider Trading Policy, is also prohibited. We have specific policies regarding trading in Littelfuse securities and impose regular "blackout periods" for certain directors, officers and associates when trading is prohibited. All directors, officers and associates are expected to be aware of and comply with the Insider Trading Policy.



LEARN MORE

[Review our Insider Trading Policy.](#)

Example

Q: Through friends, outside of work, I learned some confidential information about one of our suppliers and received a stock tip. Is it okay to buy some shares of stock of this supplier?

A: No. The information that you received was material, non-public information and you should not use it to trade in that company's securities. When your friend passed along this "tip" he or she may have been committing a form of insider trading.

INTEGRITY



Social Responsibility

We prioritize and continuously work to improve social, ethical and environmental conditions across our industries. We have implemented social responsibility programs 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 Social Responsibility Policy.](#)

Example

Q: My manager has recently selected a supplier that he said quoted a very low price for the work for Littelfuse. I know this company and the reputation it has for questionable labor practices. I'm not in charge of the decision, but should I say something?

A: Yes! You have the responsibility to preserve the reputation that we have earned for operating ethically. Share your concerns with your manager so that he can make an informed decision.

Anti-Retaliation

Littelfuse will not take any adverse action against anyone as a result of their good faith complaint, report or concern pursuant to the procedures in this Code and will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any associate based on any lawful actions taken by the associate with respect to good faith reporting of complaints, concerns or other matters regarding Littelfuse. 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. Any associate may report retaliation anonymously, unless prohibited pursuant to applicable laws, by using our Ethics Helpline. Similarly, the submission of unfounded allegations, 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.

Example

Q: What should I do if I believe that I am being retaliated against following the submission of a report on my manager's misconduct?

A: Littelfuse prohibits retaliation. Contact the Legal department uslegalteam@littelfuse.com, the Internal Audit department or submit a report to the Ethics Helpline to share your concerns.

CODE OF CONDUCT



Acknowledgement Form

Please Read Carefully Before Signing

I acknowledge that I have received a copy of the Code of Conduct. I have read carefully and understand the Code of Conduct and I agree to abide by the Code of Conduct as a condition of my employment and continued employment at Littelfuse. I understand that if I have questions at any time concerning the Code of Conduct I will consult with my immediate supervisor, my local human resources representative, or a member of the Legal Department. If I am more comfortable speaking with someone outside my business unit, I may send an email to, or call the Ethics Helpline, provided for this purpose, which is accessible 7 days a week and 24 hours a day from anywhere in the world. I may also contact the Littelfuse Corporate Human Resources Department at (773) 628-1000.

First and Last Name (Please print):

Signature:

Date:

Waivers

The Chief Executive Officer may grant waivers of any of the provisions of this Code, if he deems such a waiver to be appropriate under the circumstances; provided, however, that any waiver of this Code for any director or executive officer must be approved by the Board of Directors.