



Expertise Applied | Answers Delivered

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| <b>FUNCTION:</b> Legal                      | <b>POLICY:</b> Reporting, Investigations of Misconduct and Non-Retaliation |
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| <b>EFFECTIVE DATE:</b><br>December 16, 2020 | <b>APPROVED BY:</b> Chief Legal Officer                                    |

## **PURPOSE**

Littelfuse, Inc. (the “Company”) is committed to maintaining the highest standards of ethical conduct. As part of this commitment, the Company has adopted this Policy for associates and other interested parties to submit questions, complaints or concerns (each a “Report”) regarding perceived violations of the Company’s Code of Conduct or regarding the accuracy of the Company’s financial statements, press releases or other public disclosures, accounting, internal accounting controls or auditing matters. Furthermore, Littelfuse does not tolerate retaliation, retribution or harassment (collectively “Retaliation”) in response to those reporting their good faith concerns or participating in investigations of potential violations.

The purpose of this Policy is to (1) require associates to report suspected misconduct, (2) establish mechanisms and responsibilities for reporting misconduct and investigating those reports, (3) establish protection from Retaliation as a response to such reports, and (4) notify associates where they can seek assistance or report concerns about compliance with this Policy.

## **SCOPE**

This Policy applies to all directors, officers and associates of Littelfuse, Inc. and its subsidiaries and affiliates, wherever incorporated, chartered, organized or located, including related companies, partnerships and joint ventures in which Littelfuse has a controlling interest.

## **RESPONSIBILITY**

To ensure an independent assessment of any Reports that might directly or indirectly involve management, the Audit Committee of the Board of Directors will receive a summary of all Reports and will have the ultimate authority to manage the investigation and resolution of Reports. The details of how a Report can be made and how it will be handled are set forth below.

To facilitate the investigation of Reports, the Audit Committee has appointed the Chief Legal Officer as the Report Supervisor.

## **POLICY**

### *Reporting of Misconduct*

Littelfuse requires associates to report any violation or good faith concerns of potential violations of law, regulation or company policy, including those involving actual or suspected fraud and misconduct as well as violations of the Code of Conduct.

The Company understands that in certain cases there may be concerns about confidentiality. The Company prefers that Reports identify the person submitting them. Identification facilitates follow up and helps avoid abuse of the process by someone seeking to harm or embarrass a person who may be entirely innocent of any wrongdoing. However, if an associate feels it is necessary,

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anonymous submissions will be accepted, unless prohibited pursuant to applicable laws.

The options to submit a report are listed below.

### *How to Submit a Report*

There are five ways to submit a Report.

- 1. Letter:** Mail a description of the Report to the following address:  
Chief Legal Officer  
Littelfuse, Inc.  
8755 W. Higgins Road, Suite 500, Chicago, Illinois 60631
- 2. E-Mail:** Send the Report to the following E-mail address:  
[Helpline@Littelfuse.com](mailto:Helpline@Littelfuse.com)
- 3. Website:** Report a concern online through the following third-party, EthicsPoint website:  
[littelfuse.ethicspoint.com](http://littelfuse.ethicspoint.com)  
  
A mobile-friendly website is also available at the following address or by scanning the QR Code provided:  
[littelfusemobilehelpline.ethicspoint.com](http://littelfusemobilehelpline.ethicspoint.com)
- 4. Telephone:** Call the Ethics Helpline using the phone numbers provided on the [EthicsPoint website](#) to provide the report to an independent, third-party professional call administrator. From the website, click on the “Telephone” link to access the global phone numbers.  

Note that when contacting EthicsPoint from a country in the European Union, without prejudice to any other effective data protection notice, clause or policy within Littelfuse, this Policy potentially generates personal data processing, subject to the relevant data protection regulations. Personal data collected and/or processed in connection with submitting a Report will be used exclusively for the purpose of investigating the Report. Further, personal data submitted on a Report will be transferred out of the European Union to the United States. Associates are entitled to exercise their right of access and/or rectification, if any, with respect to any such data to the extent provided by applicable law. The data will not be used for marketing purposes. Anyone filing a Report pursuant to this policy will be deemed to consent to the above processing and transfer of personal data.
- 5. In Person:** Submit the Report in person to your supervisor.

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### *Duty to Notify the Report Supervisor*

Where an associate or other interested party has submitted a Report directly to a supervisor or member of management, the person receiving such Report must immediately notify the Report Supervisor of the Report via email to [helpline@littelfuse.com](mailto:helpline@littelfuse.com).

### *Reports Made in Bad Faith*

Reports made in bad faith are grounds for discipline. This Policy is not intended to create immunity for associates directly involved in fraud or misconduct who self-report. However, a prompt, good faith or truthful report by an associate involved in misconduct will be taken into consideration in determining appropriate disciplinary action.

## **PROCEDURE**

### *Investigation Process*

The Report Supervisor or his or her designee will monitor the above-mentioned incoming mail, e-mail address, website submissions and incoming calls on a regular basis and review all submissions.

The Report Supervisor or his or her designee will manage the processing of all Reports, regardless of whether or not the reporting person is anonymous. Associates' questions and concerns will be addressed fairly, no matter what is at stake and who may be implicated. Littelfuse associates must support and cooperate in Company investigations of suspected misconduct. Reports of misconduct will be reviewed as soon as practical.

Depending on the nature and seriousness of the allegation(s) in the Report, internal investigations may be performed by Human Resources, Finance or Internal Audit and/or the Legal Department, as deemed appropriate by the Report Supervisor or his or her designee. Allegations regarding the accuracy of the Company's financial statements, press releases or other public disclosures, accounting, internal accounting controls or auditing matters will immediately be escalated by the Report Supervisor to the Chief Accounting Officer, the Head of Internal Audit or the Audit Committee.

Each investigation will result in findings of fact, to the extent possible, and if appropriate, a recommendation of discipline. Management will impose any required disciplinary actions resulting from compliance failures or unethical conduct after consultation with those conducting the investigation.

Investigation reports will document the initial review of the allegations and any investigative or audit activity that was undertaken. If an investigation is conducted, the record of the investigation will identify the source of the allegation (unless anonymous), summarize the investigation and findings, contain recommendations for remedial action where appropriate and record the final resolution. When a report of misconduct does not merit further investigation, this conclusion and

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the reason for it will be documented.

Reports will be retained in confidential files. Access to these files will be restricted to the Report Supervisor and members of management specifically provided access by the Report Supervisor. Information pertaining to Reports will be retained for a minimum of seven (7) years from date of receipt, unless otherwise required by applicable law.

#### *Non-retaliation*

Retaliation against any director, officer or associate who reports any suspected misconduct in good faith is strictly prohibited. Retaliation means taking actions that are materially adverse to an associate. Adverse action will not be taken against anyone as a result of their good faith complaint, report or concern pursuant to these procedures and the Company 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. Any associate may report retaliation by using the Report procedures described above. 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.

#### *Oversight*

The Report Supervisor will summarize the Reports received pursuant to this Policy for the Chief Executive Officer and the Audit Committee no less than quarterly. The Report Supervisor will have the authority, in their sole discretion, to bring any Report to the immediate attention of the Chairman of the Audit Committee.

Should the Report Supervisor be the subject of a Report, the Head of Internal Audit or an appropriate member of management (so long as that member of management has no involvement with the issue raised) will be responsible to manage the investigation of such Report and take any other action he or she deems appropriate including retaining outside counsel or other advisors.

The Report Supervisor is designated as the contact person for anyone wishing to follow up on their Report. If the reporting person does not believe appropriate action is being taken, he or she may contact the Head of Internal Audit.