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EFFECTIVE DATE: June 15, 2023	APPROVED BY: Chief Legal Officer

PURPOSE

The purpose of this Conflict of Interest Policy (the “Policy”) is to support the Company’s Code of Conduct that prohibits conflicts of interest between our personal interests and the interests of Littelfuse. This Policy further establishes the framework to prevent, and where applicable, manage actual or potential conflicts of interest.

SCOPE

This Policy applies to all directors, officers, employees, and contractors or consultants of the Company and its subsidiaries and affiliates, including joint ventures in which Littelfuse has a controlling interest (hereinafter referred to collectively as “Associates”).

RESPONSIBILITY

All Associates are responsible for complying with this Policy. Anyone who does not comply with this Policy shall be subject to disciplinary action, up to and including immediate termination of employment.

The Chief Legal Officer is responsible for establishing and communicating this Policy and providing periodic training.

POLICY

An actual or potential conflict of interest occurs when an individual’s personal interests interfere with, or appear to interfere with, their independent judgment and objectivity on behalf of Littelfuse.

Associates must not use confidential, proprietary, or competitively sensitive Company information, Company assets, or their role or position at the Company for personal gains or to advance personal interests. Associates are responsible for avoiding:

- situations that present, or create the appearance of, a potential conflict between their interests and the current and future interests of the Company.
- situations where their personal or outside business or family interests could impair their ability to make sound business decisions in the best interest of the Company.
- situations that interfere or could interfere with the proper performance of their duties to the Company.

Associates must disclose the details regarding any actual or potential conflict of interest in accordance with Section 9 below and, if applicable, receive approval of an exception to this Policy in writing.

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For the purpose of this Policy, the following terms have the following meaning:

- *Business Partner* – a current or potential customer, distributor, joint venture partner, consultant, agent, representative, contractor, supplier, vendor, or affiliate of the Company and any entity or person with whom the Company conducts or plans to conduct business.
- *Close Family Member* – any person who is related by blood or marriage, or whose relationship with an Associate is similar to that of persons who are related by blood or marriage, for example, domestic partners, children by adoption, and any other individual sharing the household of an Associate.
- *Competitor* – any actual or potential competitors that directly or indirectly compete with the Company.
- *Financial Interest* – Littelfuse Associates or any of their Close Family Members holding a direct or indirect financial interest in a transaction or relationship, or holding an investment in any company or a share in any firm which is a Competitor or a Business Partner, provided that (a) ownership or passive investment of up to one percent (1%) of such an entity with publicly traded securities, and (b) ownership of one percent (1%) or less of the outstanding stock or other securities of a private entity will not ordinarily constitute a financial interest for the purpose of this Policy.
- *Gifts* – Something of value given voluntarily without expectation of payment, reciprocation or inappropriate action in return. “Gifts” includes cash, cash equivalents, and any items of value.
- *Government Official* – any official, employee, candidate, or representative of a government (including any government agency, department, or enterprise), political party, or public organization such as any officer or employee of any level of federal, state, provincial, county, and municipal government, and employees of businesses or companies wholly or partially owned, funded, operated, influenced, or controlled by a government.

PROCEDURE

Section 1. Business Partners

An actual or potential conflict of interest occurs when an Associate is in a position to influence a decision that may result in a personal gain for the Associate or a Close Family Member of the Associate as a result of the Company’s business dealings with outside firms.

Business dealings with outside firms should not result in unusual gains for those firms or any Associates or their Close Family Members. Unusual gains refer to gains outside of the ordinary course of business, bribes, product bonuses, special fringe benefits, unusual price breaks,

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employment or internship opportunities, or services for Close Family Members of Associates.

If Associates have any influence on transactions involving purchases, contracts, or leases, Associates must disclose the existence of any actual or perceived conflict of interest in accordance with Section 9 of this Policy so that safeguards can be established to protect all parties.

Section 2. Family and Friends

Associates must not attempt to influence any Company decision (including hiring or promotion decisions) or business dealings (including current or potential business dealings) that may benefit or appear to benefit a Close Family Member or an entity in which a Close Family Member is involved or has a Financial Interest.

This Policy applies in the case of a Close Family Member, a friend, individuals sharing a significant living arrangement or financial or business relationship, or individuals in a dating, intimate, or other committed relationship (collectively a “romantic relationship”) that could influence an Associate’s objectivity.

Having Close Family Members or a romantic relationship within the same reporting structure is strictly prohibited.

Disclosure in accordance with Section 9 of this Policy is required before engaging a Close Family member in any business dealings with the Company to ensure the Company’s normal procurement processes are followed and there is no appearance of special or favored treatment for Close Family Members.

Section 3. Financial Interests

Associates must not have any Financial Interest in any entity:

- that is a Company Business Partner, or
- that is a Company Competitor

If an Associate becomes aware that they hold Financial Interest in a Company that is or may be an acquisition target or a divesture target, the Associate must disclose their Financial Interest in accordance with Section 9 of this Policy.

Furthermore, Associates must not receive fees, commissions, any form of compensation, or disbursements from any of these entities unless disclosed and approved in accordance with Section 9 of this Policy.

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Section 4. Gifts, Meals, Travel, Entertainments, and other Gratuities

The acceptance, provision, or exchange of gifts, meals, travel, entertainment, and other gratuities may create a real or perceived conflict of interest or potentially be viewed as a bribe under applicable laws and regulations. Associates must ensure that:

- any gift, meal, travel, entertainment, or other gratuities received or provided do not appear to unduly influence, their business decisions for the Company, or result in any personal gains.
- all expenses incurred in connection with the provision of gifts, meals, travel, entertainment, or other gratuities must be accurately and fully recorded in the Company's books and records.
- the acceptance, provision, and exchange of gifts, meals, travel, entertainment, and other gratuities conform with generally accepted business practices, applicable laws and regulations, ethical standards, and Company policies.

Any gifts, meals, travels, entertainment, and other gratuities provided or received by an Associate must meet the following criteria unless prior exception is obtained pursuant to Section 9 of this Policy:

- Incidental to a legitimate business discussion and pursuant to a bona fide business relationship.
- Any gift received that is valued at or above US\$125 must be disclosed and approved in accordance with Section 9 of this Policy.
- Is not cash or cash equivalent (e.g., gift cards, gift certificates, vouchers, debit cards, stocks, bonds or other negotiable instruments).
- Does not create a sense of obligation or an appearance of obligation or conflict of interest.
- The purpose is not to obtain special or favored treatment or unfair business advantage.
- Setting is appropriate for a business discussion.
- Does not cause embarrassment to or reflect adversely on the Company if publicly disclosed (including frequency of the gifts, meals, travels, entertainment, and other gratuities).

Special rules apply with respect to interactions with Government Officials and Associates must follow the guidance set forth in the Company's [Anti-Bribery Policy](#) in connection with any such interactions.

Section 5. Outside Activities

Associates are discouraged from engaging in any *outside activity* if such activity decreases the efficiency or productivity of Associates at the Company or otherwise compromises Associate's obligations to the Company (e.g. through diversion of time and attention away from Associate's

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responsibilities at the Company). Outside activities must not entail disclosure of the Company's proprietary, confidential, or competitively sensitive information or use of Company assets.

Outside Employment. Associates may not maintain employment or otherwise engage in outside work or services for a Business Partner. Disclosure pursuant to Section 9 of this Policy is required in advance of an Associate seeking outside employment, to allow for review by the appropriate manager.

Corporate Opportunities. Associates may not:

- compete with the Company.
- exploit, take advantage of or otherwise engage in opportunities that are discovered through the use of corporate property, information, or position.
- use corporate property, information, or position for personal gains or advance personal interest.

Competitors. Associates may not provide assistance to a Competitor or work with any Competitor in any capacity such as an employee, a consultant, or as a member of its board of directors.

Board Appointments. Associates may not assume a position on the board of directors of or serve as an advisor to a Business Partner, Competitor, acquisition target, or divestiture target. Additionally, in advance of accepting a Board Appointment or advisory role that provides compensation to an Associate, disclosure pursuant to Section 9 of this Policy is required.

Public Service and Political Activity. Service as a public official may give rise to conflicts of interest. Associates who seek or hold an elected or appointed office while employed by the Company must disclose this information pursuant to Section 9 of the Policy and must be excused from involvement with any issue or decision that could create or appear to create a conflict of interest. In accordance with our Code of Conduct, Associates are prohibited from making any political contribution as a representative of the Company.

Charitable Organizations. Associates that are affiliated with a charitable, community organization, or non-profit association may not be involved in the decision-making process if Company funds are requested to support such organization. Any Company donation requests for an affiliated organization that an Associate has a relationship with must be disclosed pursuant to Section 9 of this Policy.

Associates are *not* required to disclose or seek approval of the following activities provided that such activity does not compete with the Company, interfere with the Associate's duties or responsibilities towards the Company, reflect negatively on the Company, entail the use of Company assets or disclosure of Company proprietary, confidential, or competitively sensitive information, or give rise to an actual or potential conflict of interest:

- Participating in non-profit civic, charitable, or community activities.

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- Affiliation with a trade association, professional association, or other such organization related to the work or position of Associates at the Company.
- Personal and business-related speaking engagements (e.g. lectures at an educational institution, presentation at trade associations or professional organizations, or participation on panels) and publishing activities.

Although disclosure is not required under this Policy, Associates should consult their manager prior to engaging with any trade association, professional association, or speaking engagements to ensure there is a clear understanding of related activities that may require further action or approval when acting as a representative of the Company.

Section 6. Protection of Company Assets

Associates must protect Company assets and ensure their efficient use. All Company assets should be used for legitimate business purposes and not for inappropriate personal use. Associates may not conduct non-Company work or solicit such business on Company premises or while working on the Company's time.

Section 7. Confidential Information

All confidential information, proprietary information, and competitively sensitive information of the Company, including but not limited to compensation data, customer lists, personnel, product lines, product pricing policies, price lists, specific customer business opportunities and history, business plans, vendor lists, product costs, credit information, technical data, inventions, financial information, and marketing strategies and information, are the property of the Company and may never be given or disclosed to an outside firm or individual except for the benefit of the Company through normal channels and with appropriate authorization. Any improper transfer of material or disclosure of confidential, proprietary, or competitively sensitive information, even though it is not apparent that an Associate has personally benefited by such an action, constitutes unacceptable conduct. Any Associate who participates in such practice will be subject to disciplinary action, up to and including discharge, in addition to possible criminal prosecution. Nothing herein will in any way limit the confidentiality obligations of Associate pursuant to any other agreements between Associate and the Company or any applicable laws and regulations.

Section 8. Ethics Helpline

Associates and any third parties who wish to maintain anonymity and report any actual or potential violation of this Policy or other ethics issues (including any concerns about accounting, internal accounting controls or auditing matters), may contact the Ethics Helpline [online](#), via email to helpline@littelfuse.com, or by [phone](#).



Expertise Applied | Answers Delivered

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Section 9. Conflicts of Interest Disclosures and Approvals

If an actual or potential conflict of interest exists or if an Associate is unsure whether one exists, the Associate must refrain from the activity and promptly disclose details regarding any actual or potential conflict of interest and, if applicable, seek approval of an exception to the Policy in writing via the [Conflict of Interest Disclosure Form](#), available on the Company's ethics and compliance training platform. The completed form will be submitted for review by the appropriate personnel.

REVISION HISTORY

First issuance.