COVID-19 NOTICE

Curtis operations worldwide are complying with local Covid-19 preventative actions. This includes following all medical and governmental infectious disease guidelines. The number one objective of Curtis is to assure the health and safety of our global employees, their families and communities. The company has also taken significant measures to assure that our worldwide teams are secure in their income and to protect their jobs during this critical time. This has included work-at-home assignments, whenever possible and paid-time-off when it is not possible. A significant number of essential employees have helped assure that our customer product deliveries and projects progress unencumbered, while working under special infection control and protection measures such as increased sanitation, disinfection, practicing social distancing and wearing Personal Protective Equipment (PPE).

Curtis has also taken measures to support our local communities, including providing PPE to local first responders and hospitals. In this difficult time, the Curtis teams worldwide have worked diligently and effectively, and most importantly, safely, which is a great source of pride for the company.

We will continue to operate safely under all applicable best practices until this crisis has passed.

It is our sincere hope that our customers, business partners and associates, and their families and communities worldwide will stay safe and well.

“The number one objective of Curtis is to assure the health and safety of our global employees, their families and communities.”
“As president & CEO of Curtis Instruments, a Kohler Company, I passionately believe in equality, diversity and inclusion and want to ensure that this is actively recognized as a key element of our Curtis culture.”

Stuart Marwell
2022
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A MESSAGE FROM THE PRESIDENT & CEO, STUART MARWELL

Curtis Instruments, a Kohler Company, takes pride in our long-standing commitment to people, community and the environment. As we embarked on producing a formal Corporate Social Responsibility (CSR) report, it was important for us to honestly reflect on the corporate culture that we have consistently built upon over 62 years. Long before there was a formal concept such as the CSR report, being good corporate citizens was an inherent part of Curtis operations and corporate culture.

Since our founding in 1960, the same concerns and practices have been in place when it comes to the well-being of our employees and the communities in which we work. Environmental consciousness, a focus on people and a commitment to doing the right thing was and is at the core of our corporate culture. As a company that designs and produces zero-emission transportation technology for electric vehicles, we have been “green” since before that term was coined.

In the mid-1980s, Curtis formalized our commitments that are today reflected in this CSR report in the ‘Curtis 10 Points’ operational principles — the tenets that are at the heart of our company culture. We don’t take these ‘10 Points’ lightly. They are at the core of who we are as a corporation, what we stand for and how we do business, day in and day out. For Curtis Instruments, CSR is nothing more than putting our ‘10 Points’ into practice, now as in the past.

Our goal is to address the core issues head-on as a direct reflection of our actual company culture and practices.

Each Curtis employee will continue to respect these ‘10 Points,’ and act in accordance with our spirit and with a strong sense of ethics, to be recognized by society as meeting and exceeding the high standards expected of us.

Sincerely,

Stuart Marwell
1 INTRODUCTION

1.1 PURPOSE OF THIS STATEMENT

This statement is made by Curtis Instruments Inc., located at 200 Kisco Ave. Mount Kisco, New York, 10549, USA, pursuant to the 2014 National Action Plan for Responsible Business Conduct.

In September 2014, the United States committed to creating a National Action Plan in order to promote responsible business conduct. Following a two-year process, the United States published its first National Action Plan for Responsible Business Conduct.

This voluntary corporate report encompasses the spirit of this plan for Curtis Instruments, Inc. as of June 2022. This CSR report is intended to guide the worldwide operations of Curtis Instruments, Inc., its wholly-owned subsidiaries consisting of sales/support offices, manufacturing plants and engineering R&D technology centers.

Curtis Instruments has a proud history of exceptional employee relations and benefits, a commitment to good corporate citizenship and to a Clean & Green environment in our zero-emission electric vehicle technology products, and in our global practices. This CSR report will summarize our commitments.
1.2 ORGANIZATIONAL OVERVIEW

Curtis is the highly specialized electrification leader of Kohler’s Energy division, a leader in power generation and backup, battery storage, commercial and industrial microgrids, and more. Since 1960 Curtis has been a global technology leader in the electric vehicle industry and has been recognized for its outstanding human resources practices.

Importantly, Curtis does not outsource manufacturing. We operate wholly-owned subsidiaries around the world and we are fully in control of every aspect of our operations, manufacturing plants and people. We manage our own people and facilities including sales, manufacturing and engineering.

Globally, Curtis’ international human resources managers report functionally to the Vice President of Human Resources at the world headquarters, in Mount Kisco, New York. All human resources managers at Curtis factories, engineering centers, and sales offices around the world, are trained professionals.

Curtis CSR practices will be reviewed and monitored annually, and this report is updated as needed to adjust for any improvements and new actions.
The Curtis ’10-Point’ principles are formally documented corporate guidelines, which are put into daily practice.

These important tenets cover all employees and operations worldwide. Each of the international Curtis subsidiaries is managed by indigenous directors who are in close alignment with the operational principles of the company, while ensuring full integration with the local culture and customs. Every Curtis employee is held to this standard to assure that these points are put into practice as systems and strategies. Curtis operates in a responsible manner to benefit our people, communities and environment. In any decision, Curtis management and staff are encouraged to: “Do the right thing!”

Curtis understands that these principles cannot be forced by procedures alone. They must be nurtured as an inherent, integrated and routine element of our positive corporate culture. This starts by the examples set by the owners, senior managers and the entire team. We constantly work to demonstrate these principles through our own actions, to put them into practice so that all of our people internalize them. We cannot reduce them to mere slogans. They must be seen in action and repeated; and when they are not, corrective action is taken in support of their realization. We hold each other to these high standards and we consistently hold ourselves to the same standards, to respect our own culture. We reject authoritarian management methods.
THE ‘CURTIS 10-POINTS’

1. Our people are our most important resource.

2. Our customers are the source of our well-being: every person in the company is responsible for exceeding customer expectations.

3. Our products must embody the best technology that is available, while meeting the needs of our markets.

4. We strive to design and manufacture only one level of quality—the highest.

5. Each person in the company is responsible for its progress, and each person must share in its success.

6. As a global company, we recognize that strength comes from the diversity of our culture.

7. We believe in a work environment that encourages and permits each person a sense of his/her own worth.

8. Relations with colleagues, with customers and with vendors must be conducted with integrity and fairness.

9. Creativity in our engineering and in all aspects of our activities is the most essential ingredient of our progress.

10. Curtis companies are citizens of the larger community and we have a responsibility to contribute to the well-being and progress of that community.

— Adopted 1986 —
3 FACTS ABOUT CURTIS

3.1 WHO WE ARE

- Curtis is a Kohler Company, headquartered in Mount Kisco, New York, USA.

- As a global technology leader, Curtis provides cutting-edge integrated system solutions for electric and hybrid-powered vehicles and equipment. As such, Curtis Instruments, Inc. is a zero-emission green technology company.

- The company operates four world-class manufacturing plants, serving the global market from the US, Europe and Asia.

- All Curtis-branded products are manufactured in Curtis’ wholly-owned subsidiaries in Carolina, Puerto Rico; Sofia, Bulgaria; Suzhou, China and Pune, India.

- We employ approximately 1,100 colleagues worldwide.

- Curtis operates five best-in-class engineering centers in New York, California, Switzerland, United Kingdom and China.

- We are committed to a coordinated and integrated process to build in quality from design to product delivery.

- The company has a network of wholly-owned sales and service offices serving major markets globally.

- We are an ISO 9001 and 14001 registered company.

- The company prides itself on providing superb supplier performance, as evidenced by numerous customer awards recognizing Curtis as a valued supplier.

- Curtis has been recognized as one of the “Best Places To Work” in New York and California.
3.2 WHAT WE DO

- Vehicle designers at major OEMs depend on Curtis technology to enhance and develop their vehicles. We help our customers succeed by making their vehicles the best they can be.

- Curtis products are designed for maximum flexibility, functionality and performance to provide the most comprehensive features and benefits in the EV industry.

- Curtis provides cutting-edge integrated system solutions for electric and hybrid-powered vehicles, equipment and machinery, including:
  - Traction, Steering and Pump Motor Speed Controllers for AC Induction, SepEx®, Permanent Magnet, Series and Interior Permanent Magnet.
  - CAN I/O Modules including I/O expansion and hydraulic control.
  - Programmers and Programming Software.
  - Programmable CAN & Serial Instrumentation and Hour Meters.
  - Battery-State-of-Charge Instruments and Battery Monitoring Systems.
  - DC/DC Converters and Battery Chargers.
  - Contactors and Disconnect Switches.
  - Powered Wheelchair Control Systems.
3.3 WHERE WE ARE

North America

Curtis Instruments, Inc.
Corporate Headquarters
Sales and R&D – Mount Kisco, New York, USA

Curtis California
R&D – Livermore, California, USA

Curtis Instruments (Puerto Rico), Inc.
Manufacturing – Carolina, Puerto Rico

Europe

Curtis Instruments (UK) Ltd.
Sales – Northampton, England
R&D – Washington, England

Curtis Instruments GmbH
Sales – Paderborn, Germany

Curtis Instruments AB
Sales – Stenkullen, Sweden

Curtis/Balkan Ltd.
Manufacturing – Sofia, Bulgaria

Curtis Instruments AG
R&D – Biberist, Switzerland

Curtis Instruments S.r.l
Sales – Milan, Italy

Curtis Instruments, SAS
Sales – Fontenay-sous-Bois, France

Asia

Curtis Instruments (China) Company, Ltd.
Sales – Beijing, China
Manufacturing – Suzhou, China

Curtis Technology (Suzhou) Company, Ltd.
R&D – Suzhou, China

Korea Office
Sales – Seoul, S. Korea

Curtis Instruments (Pacific), Inc.
Sales – Tokyo, Japan

Curtis Instruments India Private Ltd.
Sales and Manufacturing – Pune, India
3.4 ISO COMPLIANCE

Curtis utilizes dedicated ISO compliance teams to manage its operational quality, under the guidance of the Corporate Quality Assurance Department. This department maintains a certified Quality Management System consisting of documented controls, processes and procedures, reviewed by senior management.

Actions to adhere to, systemize and improve our global environmental management effort are also fully underway. Curtis is in the process of obtaining ISO 14001 certification throughout the organization. Implementation of ISO 14001 in order to meet or exceed the requirements of a certified environmental management system is part of our integrated approach to addressing environmental issues within the company.
4 PEOPLE

4.1 OUR MOST IMPORTANT RESOURCE

It is no coincidence that fully half of the important Curtis operating principles are focused on people. We recognize that our entire workforce is our single most important corporate asset.

- Our people are our most important resource.
- Each person in the company is responsible for its progress, and each person must share in its success.
- As a global company, we recognize that strength comes from the diversity of our culture.
- We believe in a work environment that encourages and permits each person a sense of his/her own worth.
- Relations with colleagues, with customers and with vendors must be conducted with integrity and fairness.

“It is no coincidence that fully half of the important Curtis operating principles are focused on people.”

No matter where a Curtis facility is located, America, Europe or Asia, for sales/support, manufacturing or engineering R&D, Curtis operates in the same way when it comes to equal employment opportunity, fair labor practices, human rights, dignity, respect and fair treatment. This is a cornerstone of our operations and corporate culture. While there are cross-cultural differences, the global Curtis standard prevails in matters that affect social responsibility. The same standards apply across the board at every Curtis Company and to employees worldwide.

Curtis is dedicated to inclusion and diversity. First and foremost, we believe in human dignity. It starts with adherence to key articles of the United Nations Universal Declaration of Human Rights of 1948.

1See Addendum 1, on page 28
4.2 CURTIS HUMAN RESOURCE PRACTICES

Curtis operations comply with Kohler HR guidelines and equally enforce the following practices worldwide. We are committed to consistently applying its internal policies:

- In order to hire and retain the best employees, we work diligently to assure employee job satisfaction. This is evidenced by the low overall global turnover rate of approximately 6%, in addition to official recognition of Curtis as being a great company to work for. Both the New York and California divisions have received prestigious “Best Places to Work” awards by Human Resources organizations based on employee surveys and best practices.

- Curtis does not utilize child labor, indentured servitude, slavery, or human trafficking or any other practice that subjugates human beings. Curtis will not tolerate such abuses and criminal activities by suppliers, vendors and business associates regarding such abuses and criminal activities.

- It is the Curtis worldwide practice to provide very good working conditions for all employees, with standard, regulated work hours, fair pay and clean, safe, and comfortable work environments.

- Our employees, whether in manufacturing, sales, engineering or other fields, are highly trained and specialized. We maintain a motivating environment to achieve job satisfaction for all team members around the world. At Curtis, human resources departments are completely committed to this important point.
• Curtis regards all people as being equal. Curtis workplaces have a uniform, global policy against discrimination based on nationality, race/ethnicity, gender, age, sexual orientation/identity, handicap, social status, social caste, or other forms of discrimination or harassment. This includes political views, religion or lack thereof, in full compliance with the intent of the UN articles.

• Curtis has strict policies against any form of sexual harassment or intimidation at any of our facilities around the world. No employee shall be subjected to unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example: a) submission to such conduct is made either explicitly or implicitly a term or condition of employment, b) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or c) such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile or offensive working environment. Sexual harassment can be physical and psychological in nature. The Curtis anti-harassment policy may be more stringent than local regulations, in which case the Curtis policy prevails.
• Curtis complies with all local laws regarding work hours, social benefit regulations, employment and labor laws, safety regulations and all other laws assuring employee well-being. However, when the Curtis standard is more favorable than the local law or regulations, the Curtis policies and practices regarding people, environment and business ethics prevail.

• Curtis respects the personal rights of each employee, which includes the right to privacy. Outside of normal security video recording in facilities and cause-based monitoring, no routine targeted video, phone or email surveillance of employees is done without legitimate legal or other proper cause.

• All Curtis employees have the freedom of association and peaceful assembly.

• Curtis is fully committed to employee health, safety and comfort. All Curtis workplaces are held to equal and high safety standards.
• Curtis operates well-maintained buildings with clean air, proper temperature control, fresh water and overall comfortable conditions in America, Europe and Asia on an equal basis.

• Any machinery or equipment used by Curtis personnel is operated in accordance with appropriate training and operational guidelines. Employee safety and well-being is always of foremost importance.

• Work hours are strictly regulated by local laws and never exceed standards.
  - Manufacturing plants operate in 8-hour shifts.
  - All employees are afforded proper breaks.
  - Vacations, time-off, sick leave and related practices comply with all local social and labor regulations.
• Curtis policy requires respect of employees and coworkers and their dignity. Curtis enforces strict policies against any form of abuse in the work environment, including:
  - Corporal punishment.
  - Physical, mental, verbal abuse or harassment.
  - Sexual abuse or harassment.
  - Personal degradation or denigration.

• Curtis believes in developing, nurturing and facilitating the success of employees. This starts with the clear definition of employment objectives and expectations, with a clear understanding of the important role each person plays. Our people understand how they are expected to treat their subordinates and co-workers, and, in turn, how they can expect to be treated.

Average Length of Service as of June 2022

<table>
<thead>
<tr>
<th>Location</th>
<th>Length of Service (in years)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Japan</td>
<td>6</td>
</tr>
<tr>
<td>China</td>
<td>7</td>
</tr>
<tr>
<td>India</td>
<td>8</td>
</tr>
<tr>
<td>Puerto Rico</td>
<td>9</td>
</tr>
<tr>
<td>California</td>
<td>10</td>
</tr>
<tr>
<td>New York</td>
<td>11</td>
</tr>
<tr>
<td>Switzerland</td>
<td>12</td>
</tr>
<tr>
<td>Italy</td>
<td>13</td>
</tr>
<tr>
<td>Bulgaria</td>
<td>14</td>
</tr>
<tr>
<td>Germany</td>
<td>15</td>
</tr>
<tr>
<td>France</td>
<td>16</td>
</tr>
<tr>
<td>UK</td>
<td>16</td>
</tr>
<tr>
<td>Sweden</td>
<td>16</td>
</tr>
</tbody>
</table>

Years: 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16
BUSINESS ETHICS

Curtis operates under very strict rules for ethics and legality, of both Kohler and Curtis. These rules are universal across all Curtis companies, regardless of location or type of operation, not only as legal considerations, but also as firm corporate values and culture.

- Curtis has a strict zero-tolerance policy against all forms of corruption, bribery, extortion, graft, kickbacks by or to Curtis employees, to anyone at any time.
- Internally, no action may be taken, directly or indirectly, to defraud, influence, coerce, manipulate or mislead any other employee, officer or director, or any independent auditor or lawyer for the purpose of rendering the accounts, records, or financial statements of the Company incorrect or misleading.

- All Curtis employees and representatives must constantly strive to avoid any circumstance that may create a conflict, or the appearance of a conflict, between personal interests and those of the Company. The standards in this policy will be implemented, interpreted, or amended periodically through written procedures or other compliance guidelines.
- All Curtis employees are expected to be good “corporate citizens.” Wherever we do business, employees and management of the Company are required to comply with all applicable laws, rules and regulations. Employees are also responsible for honoring and abiding by the contracts entered into with other parties, including intellectual property licenses (e.g., software licenses related to software packages used in our business), confidentiality agreements, contracts with customers and suppliers, and undertakings and other commitments to government authorities, business partners and other entities.
- Curtis does not allow nepotism, cronyism, or other forms of favoritism.
- Cross-cultural differences exist among our companies in different parts of the world. Local culture may dictate special circumstances and cause potential scenarios that involve making ethical decisions. While local customs can and will be adhered to, provided they fall within a limited scope, when questions arise as to what is acceptable, the Curtis standards shall prevail at all times. This limits gift giving, entertainment and other actions that might seek to influence matters affecting company business.
- Gift giving and receiving is strictly regulated and limited under the written and published Curtis policy.
- If international managers have questions about the application of a standard policy, or if confronted with a situation that presents an ethical issue that is not addressed by our policy, guidance shall be sought from corporate headquarters.
- All supervisory and management employees, including all officers and directors of the Company, have a special responsibility to lead according to the standards in this policy, in both words and action. All concerns, questions and complaints will be taken seriously and handled promptly, confidentially and professionally. There will be no retaliation against any employee for making known any concern, question or complaint in good faith.
- Curtis has a “whistle-blower” policy in effect that protects any employee who divulges unethical, legal or inappropriate actions so as to be able to come forth without fear of retaliation or negative reaction.
6.1 GREEN FROM THE BEGINNING

Curtis’s corporate activities worldwide are based on the longstanding belief that we have an obligation to pass on a healthy planet to our children and next generations.

Our approach to the environment is based on the 10th Operational principle of the ‘Curtis 10 Points’:

*Curtis companies are citizens of the larger community and we have a responsibility to contribute to the well-being and progress of that community.*

Curtis develops and manufactures advanced electric drive systems, instrumentation and battery monitoring technology for zero-emission vehicles technology. The products we design and market directly help the earth as electric transportation eliminates combustion-powered engines that emit CO₂, indoors and outdoors, including in the industrial and recreational environment. Indeed, Curtis was “green” before that term was popularized.

“Curtis was ‘green’ before that term was popularized.”

Beyond contributing to important global environmental goals like reducing green house gas emissions, Curtis products also help to improve local air quality and create healthier working conditions, while also reducing noise pollution. For instance, in the logistics and warehousing industries, which often feature enclosed spaces and material handling equipment, electric vehicles are critical for ensuring good indoor air quality and healthy working conditions.
Example: Curtis in India

India is just one of many nations confronted with serious pollution problems. Globally, air pollution is a major problem affecting the health of millions of people, causing respiratory diseases like asthma and bronchitis. There is an urgent need to introduce alternatives to pollution-generating transportation, particularly 2-cycle engines popular in Asia, which have become a serious health problem. Because of the intensifying air pollution problem, many Asian auto manufacturers embarked on electrification programs to convert their internal-combustion vehicles to quiet and clean electrical power. Curtis worked actively in India to electrify auto-rickshaws.

Curtis started operations in India in 1997 to meet the growing demand for Curtis products in the Indian market. Completely staffed and managed by highly dedicated Indian nationals, Curtis India covers sales, product and application support, plus service and product engineering for the entire Indian subcontinent. In 2021, Curtis started manufacturing motor speed controllers in our India facility. The team supports the electrification of transportation in India, to reduce carbon emission and to address climate change concerns. To our engineers in India, this mission is a matter of national pride. In late 1990s and early 2000s, many Indian automotive companies embarked on the development of quiet, clean electric power-driven vehicles. Curtis worked with SAFA tempo program in Nepal and then with Mahindra on their ‘Bijlee’ program. Curtis was a pioneer in these efforts. Some of these programs received external funding. From the outset, Curtis worked closely with the REVA car company, now Mahindra, in an example of true international technical cooperation and corporate friendship and, most importantly, to help make the air people breathe cleaner and free of toxins.
6.2 COMPLIANCE WITH ENVIRONMENTAL REGULATIONS & DIRECTIVES

In our own facilities worldwide, Curtis is focused on preserving resources and managing or eliminating environmentally harmful chemical substances whenever possible, to help conserve and protect the environment.

All Curtis manufacturing plants meet or exceed ISO 14001 environmental protection standards and employ best practices for environment and sustainability.

Curtis adheres to international standards and guidelines, including:
- Restriction of Hazardous Substances Directive (RoHS.) The EU RoHS directive tightly restricts certain hazardous substances in electronic products.
- Registration, Evaluation, Authorization and Restriction of Chemicals Declaration (REACH).
- We strive to meet Conflict Minerals legislation to the extent that it is under our control.

<table>
<thead>
<tr>
<th>#</th>
<th>Process Description</th>
<th>Bulgaria</th>
<th>China</th>
<th>Puerto Rico</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>RoHS</td>
<td>2 RoHS Products</td>
<td>65 RoHS Products</td>
<td>20 RoHS Products</td>
</tr>
<tr>
<td>2</td>
<td>No-Clean Flux</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td></td>
<td>Zero-Discharge, Closed Loop Waste Water (no waste to drain)</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td></td>
<td>All solids disposed of by locally regulated agencies</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>3</td>
<td>Packaging: Reduce, Reuse, Recycle</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td></td>
<td>Reduction of Corrugated Materials</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>
6.2.1 Emissions

- Curtis is a manufacturer of high-tech electric vehicle components, with processes that are limited to non-polluting and non-toxic Electronic Print Circuit Board Assembly and Light Electromechanical processes.
- There is no Waste-to-Drain of chemicals or contaminants into the public sewage system, the soil, storm drains, or any other inappropriate channels.
- Curtis does not release toxins into the air.
- There is only one minor emission point in each manufacturing facility for wave solder, re-flow ovens and the conformal coating and potting room. This emission is mitigated by filtration and evaporation methods, and the removal of a small amount of contaminants, which are then dried and disposed of through proper professional waste management processes. These minor emissions are all declared, permitted and approved by local legislators.
- To reduce non-essential travel, we have implemented video conferencing capabilities.
- Curtis has installed fast charging stations at numerous locations, to encourage employees to use Electric Vehicles.

6.2.2 Water Use and Conservation

- 100% electronic assemblies use No-Clean (“leave on”) Fluxes to eliminate post-defluxing and cleaning operations.
- Water conservation practices include recycling of clean water.
- The water used in the geothermal heating system in Bulgaria is re-circulated and minimally topped up.

6.2.3 Power Consumption

- Curtis tries to constantly reduce power consumption. In our Bulgarian plant, as one example, a Heller re-flow oven was installed in 2018 to reduce power consumption by 30% over the machine it replaced.
- Geothermal heating and cooling is used in Bulgaria.
- LED lighting has been installed in all factories, the New York headquarters and the California R&D Center. More will be installed in the other Curtis facilities as soon as possible.
- Internal light in all areas is supplemented by natural light through windows and skylights in China and Bulgaria.
6.2.4 Waste Reduction

Curtis strives to reduce waste whenever possible. Some examples are:

- In Bulgaria, solder dross is recycled by a certified recycler. They also collect and recycle the empty solder paste tubes.
- In our factories in China and Puerto Rico, solder is recycled in house
- Scrap strips from PCBs are recycled.
- Cardboard is collected weekly and recycled by external certified recyclers.

6.2.5 Packaging/Transportation

- Curtis facilities comply with the ISO 14001 environmental directive for packaging: Reduce, Reuse and Recycle. (See Section 3.4, pg. 9)

- Curtis is conscious of the impact of shipping and packing on the environment. Efficiencies in these practices help to reduce emissions and waste.

- Approximately 75% of our products are “Made in Market”, which results in closer relationships with our customers and minimized shipping distances.

- Bulk packaging is used for major customers. This reduces the number of shipments and resulting carbon pollution. Curtis has increased usage of bulk packaging with key customers whenever possible.

- Shipments of components from Asian suppliers are consolidated in full containers and shipped by sea to our Puerto Rico plant.

- Many shipments into Europe are drop-shipped directly from the manufacturing location irrespective of where the customer placed their order. This eliminates one shipping point.

- Curtis products are packed in sustainable, renewable and/or bio-degradable materials. In general, we do not use styrofoam, peanuts or other non-biodegradable packaging.

- Bulk and/or reusable packaging is used for mechanical components from suppliers to Curtis lines wherever possible.
Curtis is in an advantageous position as we operate wholly-owned subsidiary manufacturing sites and do not use third-party manufacturers to produce our products. We are therefore in control of our operations and able to assure that they are managed under the highest standards when it comes to people, environment and overall conduct. Also, a large share of all Curtis purchases comes from only four major global electronic equipment distributors, all of whom published their own CSR reports, indicating full compliance with the international human rights and environmental/sustainability standards. Curtis also purchases finished good products for resale from highly respected international manufacturers, such as Albright International, who also sell their products under the stringent EU regulations covering CSR.
Curtis strives to hold its suppliers, vendors, business associates and anyone we work with to the same standards when it comes to the well-being of people and the environment.

Performance of tooled component suppliers at Curtis is monitored for ethics and environmental gaps through our Compliance reporting initiative. This formal program includes third party compliance reviews at suppliers for Conflict Mineral, REACH/RoHS and Human Trafficking and Slavery levels using industry-standard guidelines and templates. Curtis seeks to hold all suppliers to comply with national and international standards and guidelines, including:

c. SCIP database entry as required by the revised EU Waste Framework Directive.
d. Regulation of Persistent Bioaccumulative and Toxic Chemicals under TSCA section 6(h).

2See Addendum 2, on pg. 30 and Addendum 3, on pg. 31
COMMUNITY AND SOCIETY

One of the ‘Curtis 10-Points’ Operating Principles states:

*Curtis companies are citizens of the larger community and we have a responsibility to contribute to the well-being and progress of that community. This operational tenet manifests itself in our worldwide operations.*

### 8.1 PHILANTHROPY AND VOLUNTEERING

Corporate giving is an important part of Curtis’ local community support. In the New York headquarters, Curtis supports numerous local non-profit organizations with regular, significant financial grants. This includes the local hospital, social welfare organizations, youth, childcare and educational organizations, food banks, environmental and sustainability organizations, immigrant integration organizations, and arts organizations.

The company also provides support in areas where the non-profits might not have in-house expertise or the budget to afford external services. The Curtis advertising and public relations department provides on-going pro bono support, consulting and guidance to organizations in the community. Curtis team members are encouraged to serve on the board of directors of local community organizations and to attend board meetings, even if on company time.

Curtis also sponsors major fund drives to respond to international emergencies, and often the Company provides a matching grant. This type of employee-driven, company-matched fundraising has supported victims of floods, hurricanes, tsunamis, and other catastrophes.

These efforts are replicated globally. For example, Curtis India celebrates its yearly anniversary by helping others. As a group, they identify a needy organization that does not receive government aid. The Curtis India team then sponsors assistance. They serve homes for seniors and orphanages. The team spends time with the residents and works to understand their challenges, serving them food and donating items and other materials.

Another example is Curtis Puerto Rico, where the company supports orphanages, children’s cancer hospitals and related organizations.

Numerous similar charitable and community support actions are contributed to by Curtis worldwide.
8.2 SCHOOL SPONSORSHIPS

Curtis donates products to technical schools, high schools and universities worldwide, in support of instructional tech-programs related to building electric vehicles. We support their EV programs and directly mentor students in their projects, often in preparation for competition in electric and solar car races.

This usually consists of donating motor speed controllers and related technology, along with providing guidance and tech-support. Curtis often provides substantial installation assistance to students in programming and calibrating the provided technology. Over the last 45 years, we have supported hundreds of schools, helping thousands of students, providing hundreds of thousands of dollars worth of products and services. We actually have never refused help to any legitimate electric vehicle student project and we are proud of our role as a business that partners with educational institutions. This pivotal partnership has also had a positive impact on Curtis, as the company has hired several students from the educational programs that we sponsored.
8.3 INTERNSHIPS
In our various locations, Curtis regularly offers internships to high school and college students in various disciplines, most often during the summer semester break. Typically, this can include engineering, marketing, logistics, finance and other fields. Students are assigned to areas related to their study in order to gain real-life, hands-on job experience under the mentorship of Curtis department experts. It is the Curtis goal to immerse students in meaningful, relevant projects, so that they can gain valuable hands-on experience. Several of the students who started out as interns with the company are now full-time employees, with one now active as a Vice President with Curtis.

8.4 COMMUNITY OUTREACH
Curtis regularly engages in local community educational outreach efforts, primarily to promote electric vehicle technology as advocates of green transportation. This is usually in science fairs, community ecology days and local sustainability events. Curtis EV experts volunteer on weekends at these fairs. We distribute educational literature and provide rides in special electric vehicles.
9 ENDORSEMENT OF THIS STATEMENT

Curtis and Kohler recognize the absolute importance of the matters considered in this Corporate Social Responsibility Report. We will continue to take measures to ensure that all topics addressed in this document will be implemented worldwide in all Curtis operations. The Company welcomes this opportunity to state its strong commitment to ethical and responsible practices in all divisions of Curtis Instruments around the globe.

10 SUMMARY

In every sphere of concern, Curtis Instruments can assure its customers that our company strives to adhere to the highest Corporate Social Responsibility standards. Curtis operations embrace this responsibility and encourage a positive impact through the company’s activities related to the environment, consumers, employees, communities.

We work hard to inspire and engage our employees. We want them to feel that working at Curtis is more than just a job – their ideas, energy, and commitment propel our success. We continue to focus our efforts on building an engaged, talented, and motivated workforce in every facet of our operation.

We believe in the principle of “do no harm” and we are focused on assuring that we minimize our impact on the environment in every aspect of our operations, to assure that our children will inherit a world with clean air, water and soil. Curtis is focused on minimizing waste, reducing emissions, conserving water and energy and recycling to the highest level attainable – in our operations, our supply chain and our products. We want to make a positive impact on the communities wherever we are active around the world.

We have actively worked toward achieving these goals for 62 years.

For Curtis this is more than a required report. It is a way of life.

“We work hard to inspire and engage our employees. We want them to feel that working at Curtis is more than just a job.”
Addendum 1

Curtis Adherence to the United Nations Universal Declaration of Human Rights

Curtis upholds and implements all of the United Nations Universal Declaration of Human Rights in all operations without exceptions. In particular, Curtis operations strictly respect and adhere to the following articles that affect our business operations and their employees and families:

Article 1
All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood.

Article 2
Everyone is entitled to all the rights and freedoms set forth in this Declaration, without distinction of any kind, such as race, color, sex, language, religion, political or other opinion, national or social origin, property, birth or other status. Furthermore, no distinction shall be made on the basis of the political, jurisdictional or international status of the country or territory to which a person belongs, whether it is independent, trust, non-self-governing or under any other limitation of sovereignty.

Article 3
Everyone has the right to life, liberty and security of person.

Article 4
No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms.

Article 5
No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.

Article 6
Everyone has the right to recognition everywhere as a person before the law.

Article 7
All are equal before the law and are entitled without any discrimination to equal protection of the law. All are entitled to equal protection against any discrimination in violation of this Declaration and against any incitement to such discrimination.

Article 12
No one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honor and reputation. Everyone has the right to the protection of the law against such interference or attacks.

Article 16
1. Men and women of full age, without any limitation due to race, nationality or religion, have the right to marry and to found a family. They are entitled to equal rights as to marriage, during marriage and at its dissolution.
2. Marriage shall be entered into only with the free and full consent of the intending spouses.
3. The family is the natural and fundamental group unit of society and is entitled to protection by society and the State.
Addendum 1 continued

Article 18
Everyone has the right to freedom of thought, conscience and religion; this right includes freedom to change his religion or belief, and freedom, either alone or in community with others and in public or private, to manifest his religion or belief in teaching, practice, worship and observance.

Article 19
Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers.

Article 23
1. Everyone has the right to work, to free choice of employment, to just and favorable conditions of work and to protection against unemployment.
2. Everyone, without any discrimination, has the right to equal pay for equal work.
3. Everyone who works has the right to just and favorable remuneration ensuring for himself and his family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection.
4. Everyone has the right to form and to join trade unions for the protection of his interests.

Article 24
Everyone has the right to rest and leisure, including reasonable limitation of working hours and periodic holidays with pay.

Article 25
1. Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control.
2. Motherhood and childhood are entitled to special care and assistance. All children, whether born in or out of wedlock, shall enjoy the same social protection.

Article 29
1. Everyone has duties to the community in which alone the free and full development of his personality is possible.
2. In the exercise of his rights and freedoms, everyone shall be subject only to such limitations as are determined by law solely for the purpose of securing due recognition and respect for the rights and freedoms of others and of meeting the just requirements of morality, public order and the general welfare in a democratic society.
3. These rights and freedoms may in no case be exercised contrary to the purposes and principles of the United Nations.
Addendum 2

Compliance with UK Modern Slavery Act 2015

Purpose of this Statement
This statement is made by Curtis Instruments (UK) Ltd., located at 5 Upper Priory Street, Northampton, NN1 2PT, England, pursuant to the Modern Slavery Act 2015.

Our Policies and Commitments
Curtis Instruments (UK) Ltd. is a wholly owned subsidiary of Curtis Instruments, Inc., –’Curtis’ – located at 200 Kisco Ave., Mount Kisco, New York, 10549, USA. Since 1960, Curtis has been a global technology leader in the electric vehicle industry and has a proud history of employee welfare.

Curtis operates all subsidiaries according to the highest international standards and practices: equal employment opportunity, fair labor practices, human rights, dignity, respect and fair treatment. Because Curtis operates its own factories, the company is in full control of operating conditions and human resources management.

Curtis has a zero-tolerance policy approach to all forms of slavery and human trafficking or any other criminal activities that violate basic human rights. This starts with compliance to the United Nations Universal Declaration of Human Rights of 1948.

Curtis factories and worldwide operations are in strict compliance with the UK Modern Slavery Act 2015: https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted

Curtis does not utilize child labor, indentured servitude, slavery, or human trafficking or any other practice that subjugates human beings. Furthermore, it is the Curtis practice to ensure our factories worldwide provide excellent working conditions for all employees, with standard, regulated work hours, fair pay, and clean, safe, and comfortable work environments. Curtis adheres to, or surpasses all local laws regarding work hours, social regulations, employment and labor laws, safety regulations and all other laws assuring employee wellbeing.

Curtis does not tolerate incidents of slavery and human trafficking in any form at its suppliers, with service providers and during all other associated business activities. Curtis employs third party provider Assent to perform yearly verifications at all active Curtis component suppliers using the Slavery and Trafficking Risk Template (STRT). The STRT is a comprehensive industry-standard survey, which requires feedback regarding slavery and human trafficking. Every year Curtis identifies its active suppliers, and Assent examines relevant information about each supplier on an annual basis to evaluate risks and vulnerability to slavery or human trafficking in the production of supplier goods. Assent provides this feedback and flags non-compliant suppliers for Curtis review.

For new, returning and re-visited fabricated part suppliers Curtis monitors supplier behavior and compliance through our own internal auditors who perform extensive announced investigations according to procedural qualification screenings. Internal auditors recognize and report non-compliance as part of the audit performance process. Non-compliances found must be immediately mitigated or the supplier is disqualified until the violation is remedied. Curtis does not directly perform supplier audits at customer off-the-shelf (COTS) component suppliers, however information is provided by Assent via STRT reporting.

Endorsement of this Statement
The Senior Management and Board of Curtis Instruments (UK) Ltd. UK recognises the absolute importance of the matters considered in this Statement and the Modern Slavery Act. We will continue to take all measures necessary to ensure that slavery and human trafficking have no place in Curtis UK’s business operations. The Company welcomes this opportunity to restate its commitment to ethical and responsible practices in all parts of Curtis Instruments, worldwide.
Addendum 3

Statement Regarding the California Transparency in Supply Chains Act

The California Transparency in Supply Chains Act (Steinberg, 2010) intends to provide California consumers with information about efforts that companies are undertaking to prevent and root out human trafficking and slavery in their product supply chains.

As described, Curtis Instruments (Curtis) does not tolerate incidents of slavery and human trafficking in any form throughout its business processes including at suppliers, with service providers and during all other associated business activities.

Curtis responds to the intent of the California Transparency in Supply Chains Act by implementing the following measures:

**Verification:** Curtis employs third party provider Assent to perform yearly verifications at all active Curtis component suppliers using the Slavery and Trafficking Risk Template (STRT). The STRT is a comprehensive industry-standard survey, which requires feedback regarding slavery and human trafficking. Every year Curtis identifies its active suppliers, and Assent examines relevant information about each supplier on an annual basis to evaluate risks and vulnerability to slavery or human trafficking in the production of supplier goods. Assent provides this feedback and flags non-compliant suppliers for Curtis review.

**Audits:** For its new, returning and re-visited fabricated part suppliers Curtis monitors supplier behavior and compliance through our own internal auditors who perform extensive announced investigations according to procedural qualification screenings. Internal auditors recognize and report non-compliance as part of the audit performance process. Non-compliances found must be immediately mitigated, or the supplier is disqualified until the violation is remedied. Curtis does not directly perform supplier audits at customer off-the-shelf (COTS) component suppliers, however information is provided by Assent via STRT reporting.

**Certification:** Curtis expects all of its suppliers to enforce strict policies against all slavery and human trafficking events and, if requested, must provide certification evidence for meeting applicable labor laws for Curtis part shipments.

**Internal Accountability:** Curtis has a zero-tolerance policy approach to all forms of slavery and human trafficking or any other criminal activities that violate basic human rights. This policy is displayed through both the Human Trafficking and Slavery and CSR links located at the main website footer (www.curtisinstruments.com).

**Training:** Assent provides Curtis training and learning references regarding slavery and human trafficking through its website.
## Addendum 4

### 2022 ISO Certification Agency

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“No matter where a Curtis facility is located – America, Europe or Asia, for sales/support, manufacturing or engineering R&D – Curtis operates in the same way when it comes to equal employment opportunity, fair labor practices, human rights, dignity, respect and fair treatment. This is a cornerstone of our operations and corporate culture.”