
CURTIS INTERNATIONAL LTD

7045 BECKETT DRIVE, UNIT 15, MISSISSAUGA, ONTARIO, L5S 2A3
TEL.: 416-674-2123; TOLL FREE: 1-866-674-2123 FAX: 416-674-2135; TOLL FREE FAX: 1-866-965-9854;
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Curtis International Ltd.:

Statement Against Modern Slavery

This document outlines the measures implemented by Curtis International Ltd. (Curtis) throughout the fiscal year ending May 31, 2024, to combat various forms of modern slavery, such as forced and child labor, within our business operations and supply chains. This document has been collaboratively prepared with our business partners and has received approval from the President of Curtis International Ltd.

1. Who are we?

Curtis acts as the central hub for our operations, supported by a network of distribution facilities across North America. With a legacy spanning more than thirty years, our company has solidified its position as a leader in the distribution sector. Specializing in the production and distribution of a diverse range of budget-friendly home appliances and consumer electronics, we prioritize affordability without compromising on quality. Our commitment goes beyond pricing – we meticulously curate products that combine accessible costs with cutting-edge features, all proudly showcased under renowned brands. This extensive product range is accessible through various distribution channels, ensuring availability through reputable retailers across the spectrum.

2. Our Commitment to Human Rights

Curtis is committed to providing a safe, healthy workplace that promotes a high level of job satisfaction and a respectful work environment. We believe that it is a shared responsibility of all employees to work towards the constant improvement of our workplace and to preserve the core values and business principles that our organization is founded upon. Curtis is dedicated to fostering an environment where every individual is treated with dignity and respect, can contribute fully, and has equal opportunities. We adamantly oppose modern slavery in all its forms, including forced labor, child labor, and human trafficking, both within our business operations and throughout our supply chains.

3. Our Structure, Operations and Supply Chain

3.1 Structure and Operations

Curtis operates primarily from a joint office and warehouse facility located in Mississauga, Ontario, Canada. However, Curtis maintains offices and warehouses throughout Canada, with additional supply chain support provided by a related party based in China, 3PL operations in the United States and Customer Call Center Operations in the Philippines.

- a. Mississauga, Ontario, Canada – This facility serves as the corporate headquarters of Curtis. It encompasses our primary distribution warehouse and houses the central office, which acts as the core of our operations. Staffing at this facility ranges seasonally from 45-60 employees in both the office and warehouse locations.

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- b. Montreal, Quebec, Canada - This facility hosts our graphics, product, and brand licensing teams, which collaborate closely with our Mississauga and partners in Shenzhen, China offices, as well as our Licensed Brand partners. This is a smaller team consisting of 3-4 staff members at any given time.
- c. Surrey, British Columbia, Canada – This facility oversees warehousing and distribution for Western Canada. Staffing at this facility ranges seasonally from 5-10 employees.
- d. Shenzhen, China – This a related company with responsibilities to AQL product inspections / testing / compliance, factory audits/compliance, packaging inspections, and purchase order inspection. This team includes 1 QA manager, multiple engineers, 9 inspectors that rotate between factories and are specialists in our category of product. The inspectors are also responsible for coordination with third party inspectors from Intertek, SGS, etc..

3.2 Supply Chain

Curtis has third party and outsourced arrangements to optimize resources and enhance consumer experiences. These third-party entities are not responsible for producing or sourcing goods. The Curtis team in Mississauga is responsible for overseeing all the below third-party activities.

- a. Trius Logistics (Carson, California, United States) - This facility is the primary 3PL warehouse distribution center that Curtis utilizes for shipments within the United States.
- b. CNR International (Compton California, United States) – This is a secondary overflow 3PL warehouse facility that Curtis utilizes for shipments within the United States.
- c. BeGlobal Logistics (Houston, Texas, United States) – This third-party logistics provider manages overflow orders for a particular customer demographic.
- d. Blue Arrow Warehousing & Logistics (Summerville, South Carolina, United States) - This third-party logistics provider manages overflow orders for a particular customer demographic.
- e. EmpireOne (Carcar City, Cebu, Philippines) – This call center is the primary point of contact for consumers. EmpireOne provides consumers with technical support, warranty support and processing of warranty claims, and general consumer inquiries.

Curtis does not manufacture the goods themselves; instead, they procure them from multiple factories situated across Asia. Curtis recognizes the risk of forced and/or child labour during the manufacturing of products in foreign markets and as a result Curtis has representatives from partner offices in Shenzhen, China visiting foreign partner facilities on an ongoing basis. These representatives have been instructed to be on the look for prohibited forms of labour to ensure that Curtis is not contributing to the exploitation of vulnerable workers. Curtis is also a C-TPAT member. As a C-TPAT member Curtis is required to continuously monitor and audit all business partners on an ongoing basis by conducting, at a minimum, an annual risk and readiness assessment with each of its business partners.

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4. How We Identify and Address Modern Slavery Risks

In our due diligence process, we thoroughly examine and evaluate the human rights implications within our workplace and across all facets of our operations, including our collaborations. We expect both our employees and third-party associates to align with our dedication to upholding human rights.

Throughout Curtis, robust policies and frameworks are firmly established, and we remain steadfast in our ongoing efforts to combat modern slavery, including but not limited to forced and child labor, human trafficking, and other infringements on human rights, through the implementation of the measures detailed in this statement.

Key Policies and Procedures Supporting Modern Slavery Preventions

Policy	Description	Supporting Factors
Global Code of Conduct	This document establishes clear standards for the behavior and treatment expected from team members towards their fellow colleagues and partners. It emphasizes principles such as honesty, integrity, and respect as fundamental values that should guide interactions within the team and in partnering relationships.	By setting these standards, the document promotes a positive work culture built on mutual trust, professionalism, and ethical conduct, ultimately contributing to a harmonious and productive working environment. There is protection from retaliation for all team members who, in good faith, report any violations of the policy.
Workplace Policy Against Discrimination	The document outlines Curtis as a multicultural workplace, emphasizing its dynamic and inclusive environment that values and embraces diversity. It highlights the organization's commitment to non-discrimination, stating unequivocally that discrimination based on any differences will not be accepted, tolerated, or overlooked.	This statement reaffirms the company's dedication to fostering a culture of respect, equality, and fairness, where every individual feels valued and respected, irrespective of their background or differences. Furthermore, it ensures protection from retaliation for all team members who, in good faith, report any violations of the policy.
Factory Auditing	Representatives from Shenzhen, China offices undertake regular and unannounced visits to the manufacturing facilities responsible for producing our products. These representatives are equipped with training to identify suspicious or prohibited behaviors and practices. It is mandatory for them to promptly	Suppliers are mandated to adhere to employment practices that fully comply with the laws in the jurisdictions where they conduct operations. Curtis takes pride in its collaborations with legitimate business partners who align with our organizational culture and values. This proactive approach underscores our commitment to

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	<p>report any such activities to senior management.</p>	<p>maintaining ethical standards throughout our supply chain and ensuring that our partnerships uphold our shared principles and ideals. Facilities that exhibit any evidence of human rights abuse or indications of modern slavery are categorically considered unacceptable partners. Such instances are promptly reported through the designated and appropriate channels for investigation and further action.</p>
<p>Shipment Verification</p>	<p>Shipments originating from factories we partner with in China and bound for a Curtis warehouse or customer undergo a rigorous packaging and review process to safeguard against tampering during transit. At the factory, each container undergoes meticulous packing, weighing, and sealing procedures. The weight and seal details are then communicated to various parties involved in the shipping process, including the shipping line, freight forwarder, drayage company, and the destination warehouse or customer. This information is also documented on the original bill of lading. Throughout the transit journey of each container, this information is consistently verified at every step. Any discrepancies identified are promptly reported to the relevant channels, including Curtis senior management.</p>	<p>Curtis conducts thorough due diligence examinations of all third parties engaged in its procurement process. This comprehensive approach ensures transparency and accountability throughout the shipping process, helping to maintain the integrity and security of the shipments en route to their final destination. This commitment underscores the organization's unwavering dedication to upholding ethical standards and ensuring that its partnerships align with principles of dignity, human rights and to foster transparent and sustainable business relationships throughout its procurement operations.</p>
<p>Call Centre Declaration</p>	<p>The call center maintains a stringent stance and enforces a zero-tolerance policy towards any manifestation of modern slavery or related practices. It operates under strict recruitment and hiring protocols that all hiring</p>	<p>Curtis manages human rights risks as an integral part of its culture. This integrated approach allows Curtis to identify, assess, and mitigate risks comprehensively, ensuring that its operations align with ethical</p>

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	<p>managers are obligated to adhere to. Collaboration between the Site Operation Manager for EmpireOne and the Customer Service Manager ensures rigorous adherence to all Curtis policies, procedures, and cultural values within the call center operations. Furthermore, as an additional measure to uphold ethical standards, the Corporate Secretary for EmpireOne is tasked with conducting an annual audit on the employees. Additionally, they are required to sign an affidavit for the Certification Against Child Labor, which is duly notarized at the time of signing.</p>	<p>standards and contribute positively to the well-being of communities and the environment. These measures also highlight the commitment of the call center to combatting modern slavery and ensuring a workplace environment that is respectful, lawful, and in line with ethical principles.</p>
<p>C-TPAT Membership</p>	<p>Curtis is a proud member of the C-TPAT supply chain security program. As a member Curtis must participate in an annual audit of its trade practices and business partners, which includes a scrutiny on social practices and policies during the risk assessment.</p>	<p>Curtis audits all business partners on an ongoing basis by conducting, at a minimum, an annual risk and readiness assessment with each of its business partners. All partners (factories, forwarders, steamship lines, etc...) must complete and provide a security compliance grading report which must meet or exceed the C-TPAT program requirements.</p>

Curtis establishes policies and procedures that mandate compliance from all staff members and business partners. This includes a firm commitment to upholding human rights and combating modern slavery, which encompasses forced labor, child labor, and human trafficking. While all affiliates are expected to adhere to the laws, rules, and regulations of their operating jurisdictions, Curtis retains the authority to monitor third-party compliance with its policies and procedures.

As Curtis has successfully implemented the aforementioned policies and procedures, and has aligned itself with staff members and business partners who share similar ideals and culture, there were no high-risk reports during fiscal year 2023. Consequently, no remediation measures were required during this period concerning modern slavery, including forced and child labor, or human trafficking. This positive outcome reflects the effectiveness of the company's proactive approach in promoting ethical practices and ensuring compliance throughout its operations and supply chain.

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Curtis maintains a zero-tolerance policy towards all forms of modern slavery, forced labor, child labor, and human trafficking. Any suspicions or incidents of such activities must be reported promptly. Failure to report such suspicions or incidents may result in severe consequences, including but not limited to termination of the partnership and reporting to the appropriate authorities. This stringent policy underscores the company's commitment to ethical conduct, human rights, and responsible business practices across its operations and partnerships.

5. Training and Awareness

Curtis has developed and implements policies and procedures that mandate compliance from all staff members and business partners. This includes a firm commitment to upholding human rights and combating modern slavery, which encompasses forced labor, child labor, and human trafficking. At a minimum, Curtis staff participate in a review of C-TPAT policies and procedures (as applicable to Curtis International Ltd operations). Additionally, employees must demonstrate their understanding of human rights by completing various health and safety training courses, Code of Conduct and Workplace Policy Against Discrimination Policy reviews.

Both Curtis's related company in Shenzhen, China and EmpireOne Call Centre have a higher risk of exposure to risks associated with modern slavery and human trafficking than our North American (home base) operations. Consequently, stringent recruitment and hiring processes are implemented, accompanied by training to recognize the signs of forced/child labor and human trafficking. Procedures are established locally to report suspected incidents to the appropriate channels for investigation.

6. Assessing Our Effectiveness

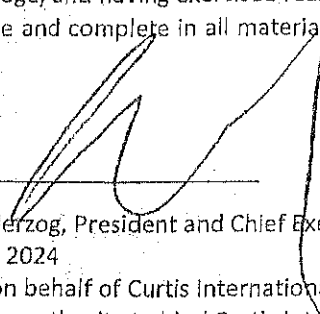
Curtis is committed to providing an environment where all individuals are treated with respect and dignity, can contribute fully, and have equal opportunities. We seek to ensure that our core values are implemented in everything that Curtis participates in, whether internally or externally with our partners, vendors, and all other stakeholders. We are committed to continually improving our approach to human rights and continue to assess and refine key performance indicators that measure our progress to our commitments. Examples of activities currently utilized by Curtis to assess the effectiveness of our actions are:

- Conducting, at minimum annually, C-TPAT risk assessment audits
- Continuous and ongoing inspections from the Shenzhen China office on vendor partner factories to ensure compliance and report any suspicious behaviours
- Identifying emerging issues with our stakeholders, both internally and externally
- Partnering with industry peers and stakeholders both within and outside the organization to cultivate and refine best practices.

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In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Aaron Herzog, President and Chief Executive Officer

May 10, 2024

Signed on behalf of Curtis International Ltd.

I have the authority to bind Curtis International Ltd.