

**Chronology of events leading up to the defect decision or test data for the noncompliance decision:**

**October 14, 2022:** Navico Group engineering was made aware of two incidents. Initial reports from the manufacturer indicated that the application included unapproved wiring of the batteries. Regardless, company engineers made the decision to temporarily stop shipping the batteries to allow time to investigate the incidents and began to gather information. The engineering team preliminarily concluded there was no product defect but, consistent with company process, notified Navico Group's Product Performance Committee ("PPC"), which is responsible for reviewing and assessing product risks.

**November 16, 2022:** PPC decided to continue the stop shipping order while it conducted its investigation. Over the course of its investigation, the PPC reviewed information from the engineering team and the manufacturer. Due to the complex nature of the events, including conflicting preliminary reports of the potential cause, such as the unapproved wiring present, the company retained Exponent for forensic analysis. Battery cell propagation testing showed the battery cells did not propagate or exhibit battery cell thermal runaway. Given those findings (although the investigation continued), the engineering team concluded that the batteries did not present a risk of fire, but rather that any thermal events were safely contained within the battery case and would not present a risk of injury or fire.

**December 16, 2022:** Exponent presented information to the PPC showing that its thermal expert had concluded that there was possible, probable, and actual flame escape from certain battery cases in question, which led to the conclusion that the batteries may present a risk of fire.

**December 19, 2022:** Navico Group submitted an initial report to CPSC, and continued its investigation into whether the subject batteries were potentially also used in motor vehicle applications.

**December 2022 – January 2023:** Navico Group investigated possible motor vehicle applications for the subject battery, and determined that the RELiON battery website noted a potential application for the batteries in "low speed vehicles." Navico Group also determined that it had distributed batteries to Garia and WAEV, which manufacture of golf carts and low speed vehicles. After discussions with Garia and WAEV, Navico Group determined that some subject batteries were installed in new Garia and WAEV low speed (FMVSS 500) vehicles.

**January 31, 2023:** Navico Group determined that some of the batteries were distributed as "motor vehicle equipment," and began preparing a Part 573 report for submission to NHTSA.