

Modern Slavery Act Statement 2024

1. Introduction

This is the Modern Slavery Act Statement for Seeing Machines Limited and its wholly owned UK subsidiary, Seeing Machines (UK) Limited (collectively “Seeing Machines”) (the “Statement”) which covers the period from July 1, 2023 to June 30, 2024 (the “Reporting Period”). This Statement has been produced in accordance with Australia’s *Modern Slavery Act 2018* (Cth) and the UK’s *Modern Slavery Act 2015*. This Statement covers all entities in the Seeing Machines Group.

Seeing Machines crossed the revenue threshold for mandatory reporting under the UK’s Modern Slavery Act in FY2023 but has not yet reached the threshold for mandatory reporting under Australia’s Modern Slavery Act. Nevertheless, Seeing Machines recognises the importance of transparency on this important issue and embraces the opportunity to prepare this report under both Acts. This is our second Modern Slavery Statement and it discusses the approach and steps we have taken to identify, and mitigate the risks of modern slavery to our supply chain and our business.

2. About Seeing Machines

Seeing Machines exists to get people home safely and this purpose underpins everything we do. As we continue to achieve a growing and positive impact on transport safety, with over 2.6 million cars and more than 62 thousand trucks on the road today featuring our life-saving technology, we are committed to enhancing our impact into the future.

With more than 20 years’ research into human behaviour, Seeing Machines now boasts the world’s most advanced Artificial Intelligence (AI) driven driver and operator safety technology, based on real-world scenarios. By harnessing human factors science to observe a driver’s attention, Seeing Machines has the advanced technology to intervene seamlessly in real time to enhance transport safety.

Seeing Machines Limited is an Australian public company limited by shares, and listed on the AIM market of the London Stock Exchange. Seeing Machines (UK) Limited is a UK private limited company. Seeing Machines is headquartered in Canberra, Australia with staff located in other parts of Australia, USA, Germany, the Netherlands, New Zealand and Japan. We operate globally through wholly owned subsidiary companies in each of those countries (with the exception of the Netherlands which is a branch of our German subsidiary), as well as in the United Kingdom and New Zealand.

Seeing Machines relies on a highly diverse workforce and engages people with broad and varied backgrounds and skillsets, including salespeople, product developers, customer support, administrative operations and engineers. Our workforce is comprised of employees and contractors. Our indirect workforce supports Seeing Machines in delivering back-office processing services, engineering support services, and contract manufacturing. As of 30 June 2024, Seeing Machines had a global headcount of 456 employees, 14.4% of whom were located outside Australia.¹ Our total revenue for the fiscal year ended June 30, 2024 was US\$67,625,080.38.

3. Seeing Machines’ Business, Supply Chains and our Modern Slavery Risks

During the Reporting Period we undertook risk assessments to determine the risk that our operations (including our supply chains) may cause, contribute to, or be directly linked to modern slavery practices. We consider a

¹ 11.8% in the US, 1.3% in Europe, and 1.3% in other countries outside US, Europe and Australia

number of factors in assessing our modern slavery risk, including country risk, sector risk, and the nature of the goods and services we procure.

Seeing Machines has a limited geographic footprint and has not expanded beyond what we previously reported in our 2023 Modern Slavery Statement. We do not operate directly in countries with a high risk of modern slavery and our employees are located in low-risk countries and work in largely professional and technical roles due to the nature of our business. Our risk assessments identified that our modern slavery risk is largely related to our manufacturing supply chain, and to certain outsourced professional services, in each case from countries that have a higher risk of modern slavery compared to Australia.²

We do not consider that our operations pose a risk of causing or contributing to modern slavery practices but may pose a risk of Seeing Machines being linked to modern slavery practices through our supply chain. Specifically, our risk assessment revealed that the highest risks are that we may contribute to or may be linked to forced labour, debt bondage, and deceptive recruiting for labour or services because we outsource the manufacturing of our Guardian system components (including controller, vibration motor, and front facing and driver facing cameras) to manufacturers located in China, Taiwan, and Indonesia, and we also procure silicon chips from Taiwan. Seeing Machines also contracts with auto electricians in high-risk countries such as Turkey, the Philippines and South Africa for the purposes of installation of our products in vehicles for our customers. These installers are mainly small trade operators. Furthermore, we outsource certain engineering services through a labour hire arrangement with a professional firm with offices in Australia and Vietnam, and functional safety services through a similar arrangement with a professional firm with offices in Australia and India. Because of the highly skilled technical nature of the goods and services we procure, whether in manufacturing, installation or engineering services, we consider child labour and other modern slavery vulnerabilities to be low.

While we maintain a global supply chain, we have assessed that the overall risk of modern slavery from our supply chain is low.

4. Addressing our Modern Slavery Risks

Our mission is to get everyone home safely and it guides everything we do. We recognise that modern slavery is a crime with severe consequences for its victims and is antithetical to our mission and our values. We understand the role we can play, as a global business, in combatting modern slavery, and we take a rights-holder focused approach to addressing this risk. Since our first modern slavery statement, Seeing Machines has demonstrated a sustained commitment to continuous improvement in mitigating the risks of Modern Slavery in our business and supply chains.

a. Our Policies in Relation to Slavery and Human Trafficking

During this Reporting Period, we undertook a review of our policies, procedures and processes, to ensure they are fit for purpose and appropriate for our significant growth. We engaged external legal counsel to make certain that our People and Culture related policies and the employment standards and practices outlined within them are aligned with the legal requirements across the various jurisdictions that we operate in.

Seeing Machines has a suite of policies which reflects our commitment to respect human rights and manage the risks of modern slavery in our operations and supply chains. The policies relevant to slavery and human trafficking includes the following documents:

- Code of Conduct
- Corporate Social Responsibility Statement
- Modern Slavery Policy
- Procurement Policy

² Seeing Machines utilises the Walk Free Foundation's Global Slavery Index in assessing country risk: <https://www.walkfree.org/global-slavery-index/>.

- Labour Services Policy
- Whistleblower Protection Policy
- Grievance Resolution Procedure
- US Employee Handbook

Our Code of Conduct and our policies require that we behave honestly and with integrity, act with care and diligence and comply with all applicable laws. We will work with governments to support measures and protocols that address modern slavery. Our commitment to address modern slavery is expressed in our Corporate Social Responsibility Statement where we state our position and expectations on ethical sourcing of labour and employment matters.

Our Modern Slavery policy strictly prohibits human trafficking and the use of involuntary labor in our business and supply chain. Seeing Machines' Modern Slavery Policy explicitly defines human trafficking and modern slavery with reference to applicable legislation, makes clear that Seeing Machines complies with the applicable Modern Slavery laws, and describes how employees may report violations related to the policy and the law. During this Reporting Period, we updated our Modern Slavery Policy, which was reviewed and approved by the Board of Directors.

b. Our Operations and Staff

During this Reporting Period, Seeing Machines rolled out an online recruitment management system which has formal approval gates to help ensure that our policies and processes around recruitment are correctly followed. We have processes in place to ensure that we are hiring individuals with appropriate working rights, and we provide all employees with a written employment contract setting out the terms and conditions of their employment on commencement. We do not hold our employees' or contractors' passports or personal identification documents or engage in any practices that restrict their freedom of movement. Our third-party due diligence process also includes checks on third-party recruitment agencies we work with to ensure that we are not at risk of being linked to unethical conduct and unfair or illegal recruitment practices.

Seeing Machines also has in place payroll systems and compliance controls to help ensure that our employees are paid correctly and in a timely way. We work with payroll providers and external legal counsel to ensure that we are in compliance with the labour and tax laws of the countries in which we operate. Seeing Machines conducts an annual remuneration review for our employees, which involves considering global remuneration data based on the respective countries in which our employees are located in to ensure that they are being paid appropriately and competitively. Where we operate in a country that has no minimum wage legislation, we seek to establish a living wage that ensures adequate standards of living for all employees and their dependents. If queried by an employee about their pay, we take appropriate actions to investigate and ensure a satisfactory response is provided to the query. If we identify any issues, we promptly remedy these.

Seeing Machines is committed to ensuring a safe and healthy work environment for employees, contractors and other people entering Seeing Machines workplaces. We maintain work, health and safety policies and comply with the work, health and safety laws in the countries we operate in. Where work health and safety laws in countries in which we operate do not meet our standards or we otherwise consider them insufficient to prevent the risk of harm to our employees, we apply Australian work health and safety standards and practices. Our employee-led Health and Safety Committee (HSC) meets regularly to review work health and safety matters across the company, ensuring a consultative approach to Work, Health and Safety matters. During the Reporting Period, we strengthened our work health and safety team by hiring an experienced, full-time Work, Health and Safety and Facilities Manager to lead on WHS management, including providing guidance and advice to all our people on health and safety matters.

All concerns and requests relating to WHS incidents and reports are directed to our WHS and Facilities Manager through our company enterprise service management portal (ESM portal) and all requests

are addressed promptly to prioritise the welfare of our employees and ensure a safe and conducive working environment for all of our staff. We made significant developments and improvements to our ESM portal during the Reporting Period to provide a centralized and accessible platform for all employees to raise work-related requests, concerns and questions. For example, questions and concerns which SM employees may have in relation to their pay, leave and work conditions can be efficiently and securely directed to our People & Culture team through the portal, with appropriate records and logs being maintained and with the ability to produce reports and analyse trends. We are committed to ensuring that all employees can receive the support they require effectively. We encourage an environment for employees to freely raise their concerns and we will continue to improve our automated processes to drive operational efficiency and manage risks effectively within the organization.

c. Risk Assessment and Management

Our five procurement principles include risk management and corporate social responsibility. To adhere to these principles, our policies and procedures require that we risk assess our suppliers and undertake due diligence appropriate to the risks identified. This includes consideration of country risk (both modern slavery and corruption risk), sector risk, and counterparty risk. We do this to ensure that the goods and services we procure are free from trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

During the Reporting Period, we updated our policies and processes to embed ESG principles and performance indicators into vendor selection and monitoring processes, ensuring that environmental impact, social responsibility and governance practices are key factors in our decision-making processes. This approach includes assessment of suppliers based on their ESG performance, ensuring that they have ethical business practices, and comply with all applicable laws, including modern slavery laws.

Our third-party risk management process is critical in assessing and understanding the business risks which we are exposed to through the third parties we do business with. We adopt a risk-based approach where we conduct pre-contractual checks and make other inquiries to satisfy ourselves that higher risk third parties are not engaged or associated with modern slavery. During the Reporting Period we completed the roll out of our third-party due diligence and compliance tool. Our third-party due diligence and compliance tool allows us to perform a baseline check of all third parties we engage with for potential risks, including sanctions, bribery and corruption, and human rights violations (including modern slavery) prior to establishing a business relationship. This applies to third parties including suppliers, contractors and distributors, as well as our customers. If a risk is identified through baseline screening, we undertake further due diligence by doing an enhanced due diligence check on the applicable third party through our third-party due diligence and compliance tool. This is coupled with further consultation with various decision-makers from relevant departments including Procurement, Legal and Quality. We may also engage with the third party to obtain further details about any risks identified, request that the third party respond to allegations in the media or elsewhere, and/or put in place mitigations such as contractual controls or ongoing monitoring and evaluation. We document the steps we have taken. If we are not satisfied that a third party meets our values and standards, we will not enter into an engagement with them or will end our relationship if one already exists.

The Board of Directors maintains oversight of supply chain risks through the Risk, Audit and Finance Committee, and receives regular updates from our Governance, Risk and Compliance Officer. If required, the Board of Directors will be informed of risks of a particular third party and proposed mitigations.

During the Reporting Period, we achieved 100% tier 1 supply chain due diligence and close to 100% customer due diligence. We undertook a total of 656 checks on our suppliers and customers, with a

split of 336 baseline checks and 85 enhanced checks for our high-risk suppliers and 235 baseline checks for customers. No concerns of modern slavery were identified in our tier 1 supplier base.

Our contracts with our suppliers include representations and warranties regarding modern slavery, as well as termination rights in the event of breaches, and for our highest risk suppliers, we conduct audits to ensure that they have policies, procedures, and processes to address modern slavery and that these processes are effective. While due diligence checks across our supply chain including adverse media and watch list screening are conducted at least every two years, checks and audits on our highest risk suppliers are conducted annually.

All our employees are encouraged to report any illegal or unethical practices (among other concerns) they become aware of, observe or suspect, and the Company provides several channels for employees to raise concerns, including through our whistleblower hotline STOPLine, which also permits anonymous reporting. Reports made to STOPLine are routed directly to the Chair of our Board of Directors. We respect and protect whistleblowers and do not tolerate retaliation.

To date, we have not received any modern slavery or broader labour rights related reports against our operations and supply chain. If a modern slavery related report was received, Seeing Machines shall investigate the report in accordance with the process set out in our Modern Slavery policy.

d. Assessing our Effectiveness

Seeing Machines continues to evolve and mature as a company. Our focus during the Reporting Period has been to better understand our modern slavery risks within our operating environment, to take incremental steps to enhance our approach to address the risks of Modern Slavery and to raise awareness of such risks amongst all employees across our organization, especially for teams dealing with third parties. Through the implementation of our third-party due diligence and risk management process, we now have consistent, aligned and effective risk management controls in place to help identify, address, remedy and prevent potential human rights and modern slavery risks.

During the Reporting Period, we have increased the quantity and improved the quality of our third-party checks, which has in turn improved our decision-making processes around our engagements with third parties, and we have elevated human rights considerations amongst our strategic priorities. We continue to monitor our incident reporting and grievance mechanisms to help us assess our effectiveness and identify opportunities for improvement.

e. Training

Seeing Machines seeks to empower and support our employees as responsible members of society, capable of identifying and responding to violations of human rights in a timely and appropriate way. During the Reporting Period, we conducted a mandatory training session on Modern Slavery for all staff including the Board of Directors and senior management, focusing on defining Modern Slavery, identifying the risks of Modern Slavery in our operations and supply chains, explaining the steps we take to mitigate these risks and the role our people can play in addressing these risks. The training also covered practical examples of potential modern slavery violations that may occur within our operations or supply chain, and reinforced the ways in which employees can report any concerns without fear of retaliation. The training was attended by over 300 employees, with the recording published on our Company intranet for all current and new employees to refer to. Our employees are also able to raise a request through our ESM Portal directly to our People and Culture Team for any specific training sessions appropriate or relevant to their individual teams and responsibilities.

5. Consultation

Seeing Machines has an integrated structure with centralized corporate functions, including procurement, whereby Seeing Machines Limited provides headquarter services to its subsidiaries under intercompany agreements. During the Reporting Period we consulted with our subsidiaries on the issues discussed in this

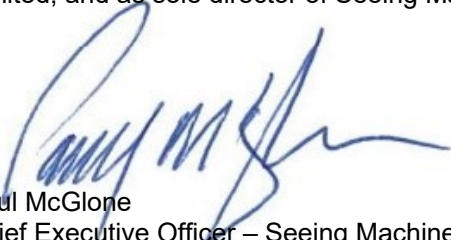
Statement, and the actions we intend to take not only to meet the requirements of the Australian and UK Modern Slavery Acts, but to meaningfully assess risks, and to implement processes to mitigate them within an environment of continuous incremental improvement.

6. Approval

This Statement was approved by the *principal governing body* of Seeing Machines Limited as defined by the *Modern Slavery Act 2018* (Cth) on 23 December 2024.

In respect of Seeing Machines (UK) Limited this Statement was approved by its sole director on 22 December 2024.

This Statement was signed by Paul McGlone in his capacity as Chief Executive Officer of Seeing Machines Limited, and as sole director of Seeing Machines (UK) Limited on 24 December 2024.



Paul McGlone
Chief Executive Officer – Seeing Machines Limited
Director – Seeing Machines (UK) Limited