

Modern Slavery Act Statement

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, 2022 to June 30, 2023 (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.¹ This is our first 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 1.3 million cars and more than 54 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. In total, during the Reporting Period Seeing Machines employed over 500 staff, 13.83% of whom were located outside Australia.² Our total revenue for the fiscal year ended June 30, 2023 was US\$57,771,000.

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

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

¹ This Statement is drafted to comply substantively with the requirements of Australia’s Modern Slavery Act, but is not being formally “published” in accordance with that Act. Specifically, for this Reporting Period, we are not voluntarily complying with the reporting requirement under the Australian Act and this Statement is not being provided to the Attorney-General’s Department for publication on the Australian Government’s online central register.

² 11.4% in the US, 1.73% in Europe, and 0.7% in Asia Pacific (outside Australia).

Seeing Machines has a limited geographic footprint and does not operate directly in countries with a high risk of modern slavery. Our employees are located in low-risk countries and work in largely professional and technical roles. 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.³

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. Furthermore, we outsource certain engineering services through a labour hire arrangements with professional firms with offices in Australia, Vietnam and India. Because of the highly skilled technical nature of the goods and services we procure 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. During the Reporting Period we rationalised and centralised our Governance, Risk and Compliance function (whose mandate includes leading the Company's response to modern slavery risks) within the legal team, and we hired an experienced Governance, Risk and Compliance Officer to lead our response. We defined the organizational structure for this function (including direct reporting to the Board of Directors) and initiated, but have not completed, a review of our policies, procedures and processes, to ensure they are fit for purpose and future proofed for our significant growth. This work is ongoing and will be reported on in greater detail in our statement for the coming Reporting Period.

a. Our Policies in Relation to Slavery and Human Trafficking

Seeing Machines' policy framework relevant to slavery and human trafficking includes the following documents:

- Code of Conduct
- Corporate Social Responsibility Statement
- Modern Slavery Policy
- Procurement Policy
- Labour Services Policy
- Whistleblower Protection Policy
- Grievance Resolution Procedure

Our Code of Conduct and 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.

³ Seeing Machines utilises the Walk Free Foundation's Global Slavery Index in assessing country risk: <https://www.walkfree.org/global-slavery-index/>.

b. 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.

We conduct pre-contractual checks and make other inquiries to satisfy ourselves that higher risk suppliers are not engaged or associated with modern slavery. Our contracts with our suppliers include representations and warranties to that effect, 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, certain audits on our highest risk suppliers are conducted annually. During the Reporting Period we undertook a competitive process to source a new third-party due diligence platform. This culminated with the engagement after the end of the Reporting Period of Moody's Analytics to provide their Compliance Catalyst platform and GRID/Orbis databases to Seeing Machines, which will be implemented in our supply chain due diligence processes in the coming reporting period.

All our employees are encouraged to report any illegal or unethical practices (among other concerns) they observe or suspect, and the Company provides several channels for employees to raise concerns, including 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.

c. 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 broader risk framework and operating environment, and to define the organisation and resources needed to adequately address our risks. While we have made progress during the Reporting Period, we recognise we still have a lot of work to do to enhance our approach, and we are not yet at the point of being able to adequately assess the effectiveness of the work we are doing to combat modern slavery risks in our business.

d. Training

Seeing Machines did not conduct any training on modern slavery and trafficking during the Reporting Period. Identifying a suitable training program and rolling it out to our employees (especially those who are front-facing to the risk) will be part of our program of continuous incremental improvement in the coming reporting period.

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.

Seeing Machines maintains an ESG Committee which met regularly during the Reporting Period. The Committee is currently being restructured to reflect the growth of the Company and to take account of the organizational changes in respect of Governance, Risk, and Compliance. The Committee will play an important role in addressing our modern slavery risks going forward, including reviewing future statements, and this will be reported on in future Reporting Periods.

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 20 December 2023.

In respect of Seeing Machines (UK) Limited this Statement was approved by its sole director on 20 December 2023.

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 20 December 2023.



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