



sustainability report

2024



Sustainability Report FY 2024

Introduction

Seeing Machines exists to get people home safely and this purpose underpins everything we do. We continue to make 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, enhancing employee engagement. We are committed to deepening our impact into the future.

With more than 20 years of 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 is able to reliably, unobtrusively, and in real time – intervene seamlessly when necessary to enhance transport safety.

We are proud to present Seeing Machines' Second Sustainability Report under the Sustainability Accounting Standards Board (SASB) Standards for the Software and IT Services Industry, which covers the period from 1 July 2023 to 30 June 2024 (FY 2024). This report highlights our ongoing efforts and achievements in promoting sustainability and responsible business practices. Throughout FY2024, we have made significant strides in upholding the highest standards of corporate governance which are integral to our mission and values. We invite you to explore this report to learn more about our sustainability progress and the steps we are taking to build a sustainable future.

Environmental Footprint of Hardware Infrastructure

Metric	Response	Code
Total Energy Consumed	2120.947GJ	TC-SI-130a.1
Percentage grid electricity	100%	TC-SI-130a.1
Percentage renewable	0%	TC-SI-130a.1
Total water withdrawn	1704m ³	TC-SI-130a.2
Total water consumed	1704m ³	TC-SI-130a.2
Percentage of each in regions with High or Extremely high Baseline Water Stress	0%	TC-SI-130a.2
Discussion of the integration of environmental considerations into strategic planning for data centre needs	See note	TC-SI-130.a3

Discussion of the integration of environmental considerations into strategic planning for data centre needs:

Integrating environmental, social and governance (ESG) considerations into strategic planning and vendor due diligence is essential for fostering sustainable growth and resilience. During this reporting period, Seeing Machines embedded ESG principles and performance indicators into our vendor selection and monitoring



processes to ensure that environmental impact, social responsibility and governance practices are key factors in our decision-making processes. Our revised vendor quality and management manual is comprehensive and is applied in practice. It captures Seeing Machines standards and requirements that apply across the vendor lifecycle. Where a decline in ESG performance is identified against our standards, Seeing Machines' vendor quality development programs or exit plans are implemented to ensure that our standards are not compromised. By prioritising ESG considerations and integrating them into our daily operations, Seeing Machines seeks to minimise ESG related risks within our supply chain and drive long term value creation that will enhance stakeholder trust and contribute positively to the broader community and environment.

Seeing Machines does not operate its own data centres. We utilise Amazon Web Services (AWS) as well as outsourced data centres in Canberra and Melbourne. As part of our procurement considerations and ongoing vendor monitoring processes, we carefully consider energy efficiency, sustainability, and compliance with environmental and other standards of the data centres we engage.

The utilisation of Amazon Web Services allows for Seeing Machines to focus on its core business while benefiting from AWS' commitment to sustainability, advanced technology and sophisticated sustainability metrics and reporting capabilities. Through its tools, Seeing Machines is able to track, measure, review and forecast the carbon emissions generated from our AWS usage during the reporting period. We obtained detailed insights into our carbon footprint, including a comprehensive summary of Seeing Machines' carbon footprint associated with AWS usage, and other data broken down into categories including our emissions savings, emissions by geography and emissions by services.

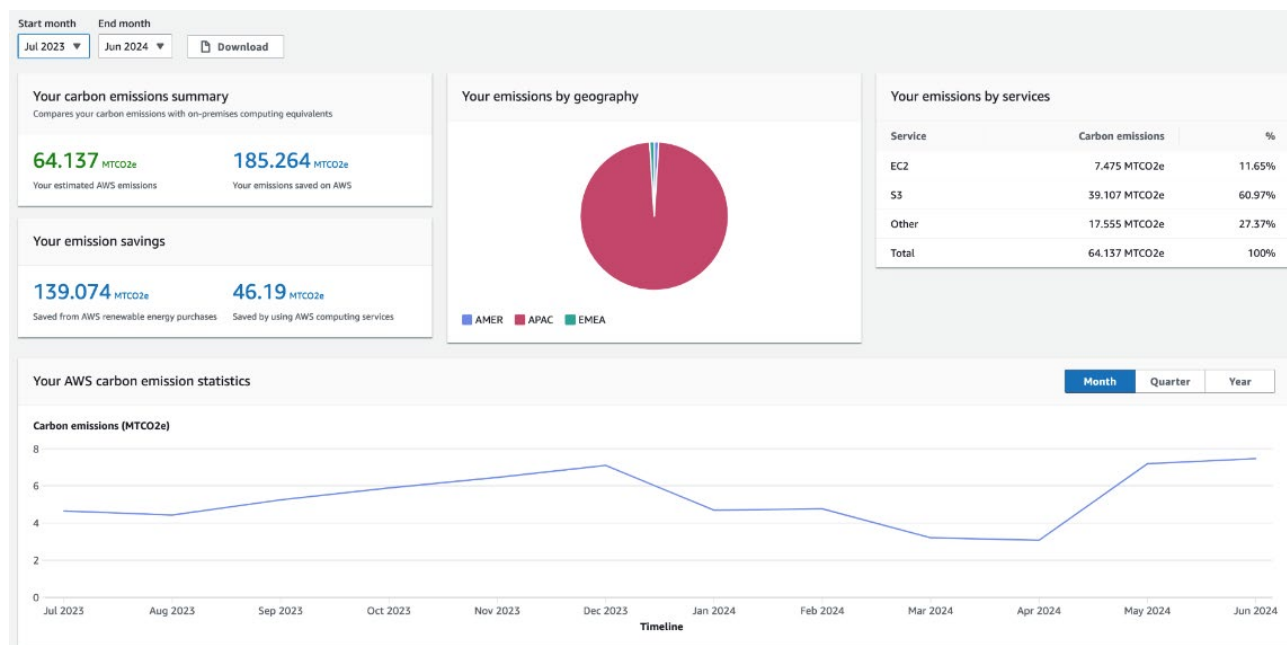


Figure 1: Seeing Machines' carbon footprint associated with AWS services for the reporting period July 23 – June 24. Table on emissions by services: EC2 = computer resources, S3 = storage, Other = all other AWS services and tools used



We are actively working to implement similar tools across our operations to help drive improvement in our sustainability performance. The ability to track and measure current emissions and forecast future emissions will allow us to take a proactive approach in identifying potential areas of high carbon output and implement strategies to mitigate and reduce impacts.

Data Privacy & Freedom of Expression

Metric	Response	Code
Description of policies and practices relating to targeted advertising and user privacy	See note	TC-SI-220a.1
Number of users whose information is used for secondary purposes	See note	TC-SI-220a.2
Total amount of monetary losses as a result of legal proceedings associated with user privacy	0	TC-SI-220a.3
Number of law enforcement requests for user information	5	TC-SI-220a.4
Number of users whose information was requested	5	TC-SI-220a.4
Percentage resulting in disclosure	100%	TC-SI-220a.4
List of countries where core products or services are subject to government-required monitoring, blocking, content filtering or censoring	We are not aware of any countries in which our core products or services are subject to government-required monitoring blocking, content filtering, or censoring.	TC-SI-220a.5

Description of policies and practices relating to targeted advertising and user privacy:

Seeing Machines takes user privacy very seriously and is continuously working to ensure privacy by design and by default. Seeing Machines has a comprehensive suite of policies relating to data protection and privacy. Our privacy policies cover all personal data collected by Seeing Machines, and details on how we use, share, and protect user’s personal data, as well as users’ rights regarding their data. Additionally, we have specific policies for handling personal data related to recruitment and for data processed on behalf of our customers and end-users during technical support and professional services. These policies outline the lifecycle of data collected by Seeing Machines, including the collection, usage, retention, processing, disclosure and destruction of information. Seeing Machines manages data responsibly and complies with all applicable data protection laws and regulations, including the Australian Privacy Act and General Data Protection Regulation (GDPR). Our Privacy Policies and other privacy related policies can be viewed: <https://seeingmachines.com/privacy-policy/>.

During this reporting period, Seeing Machines conducted targeted B2B advertising via third parties including:

- Google Ads
- Meta Ads
- LinkedIn Campaign Manager



Consent to collect demographic and location data in all advertising platforms (Google Ads, Meta Ads and LinkedIn Campaign Manager) is managed by the platforms themselves. No personal data was collected by Seeing Machines through these platforms. When partnering with third parties for advertising or other services, Seeing Machines ensures that our partners adhere to privacy standards which are similar to ours. Our contracts with third parties include clauses that mandate the protection of personal data and restrict its use to agreed purposes. We work to ensure that all personal data is handled responsibly and in accordance with our own privacy standards, policies, and the law.

In accordance with our privacy policy, Seeing Machines collects personal information from individuals who engage with us in relation to marketing, investments or other corporate communications or who visit our website. Personal information is collected through third party channels and the types of personal information collected include identification information, contact information, browsing activity, device and preference settings, etc. We primarily use the data collected to inform individuals and organisations about our activities, facilitate our activities as a public company such as company disclosure, respond to enquiries, undertake our ongoing business operations and to ensure that content from our site is presented in the most effective manner for the individual on their computer or on their mobile device. Seeing Machines uses demographic, behavioural and location data internally for reporting, to enhance advertising campaigns, and to inform and enhance future marketing activities. Seeing Machines does not share or sell Personal Data with unaffiliated third parties for any other purpose, unless explicit written consent is provided by the data subject.

A cookie consent banner is set up on the main Seeing Machines website and requires opt-in consent from all users to collect demographic, behavioural and location data. Users have the option to accept all, reject all or choose which cookies they allow. They can also change their cookie settings at any time. A cookie consent banner is set up for landing pages (hosted on HubSpot) and requires opt-in consent from users in the EU, UK, Iceland, Liechtenstein, Norway, and Switzerland to collect demographic, behavioural and location data.

Number of users whose information is used for secondary purposes:

In the context of Seeing Machines' services, our users are our business customers (fleet owners/operators) who receive Seeing Machines' Guardian services. We respect the privacy of individuals and are committed to protecting and managing the Personal Data we collect in accordance with our Privacy Policy, relevant data protection legislation, our contracts, and our stakeholders' expectations.

Categories of information we collected related to our customers are:

- identification information (e.g. contact officer name for services, such as product installation or fatigue event notification; name; unique employee identifier; vehicle identifier).
- contact information (e.g. telephone number for a client's contact officer to notify about fatigue events, email, location, company name).
- information about the performance of our customers' employees, including drivers or operators (e.g. video and still-images of the driver, as well as images from a forward-facing camera).
- information about the drivers' driving behaviour (e.g. fatigue and distraction events).
- other fleet or vehicle monitoring information (e.g. GPS coordinates, shift times, or vehicle speed).
- internet service provider (ISP), system usage and related preferences, if our customers' employees and subcontractors access on-line services, reports or other electronic information.



Seeing Machines' use of customer information for secondary purposes is for purposes related to the primary purpose or purposes described in our privacy policy (with the associated legal basis). The principal secondary purposes for which user data is used is to enhance, improve or modify our products and services, including for scientific research and is subject to our customer contracts and applicable laws.

Law Enforcement Requests

From time to time Seeing Machines receives requests from law enforcement (principally in Australia) for assistance to access data captured by Guardian systems installed in heavy vehicles that have been involved in serious accidents. Our policy is to comply with law enforcement requests to the extent required by law. Consent from the owner of the data, in this case the fleet owner/operator, is sought in the first instance where legally permissible. If this consent is not forthcoming or cannot be requested for legal reasons, then law enforcement must obtain a subpoena, search warrant, or other legally enforceable order before we will provide the data.

Data Security

Metric	Response	Code
Number of data breaches	0	TC-SI-230a.1
Percentage involving personally identifiable information (PII)	0	TC-SI-230a.1
Number of users affected	0	TC-SI-230a.1
Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	See note	TC-SI-230a.2

Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards:

Seeing Machines has a continuously enhancing cybersecurity program as a focus area for the Board of Directors and our Executive Team. Accordingly, the Board of Directors receives information security updates at least quarterly, either directly from the SVP Operations or Information Security Manager.

We employ industry leading systems to continuously monitor all information and systems, with the IS Security Team proactively identifying, responding to and remediating information security or cybersecurity risks. Seeing Machines utilises trusted cyber security partners to conduct independent cyber security maturity assessments, penetration testing and product cyber security assessments. The findings of these assessments supplement our Information Security Management System (ISMS) and security activities roadmap.

We have an ongoing security awareness program that monitors the completion of Annual Cyber Security training for all Seeing Machines employees, and contracted workforce. Training is required to be completed by all Seeing Machines employees, contractors and subcontractors connected to the Seeing Machines domain. During the reporting period, 85% of our employees completed our annual security awareness program. In addition to annual programs, other cyber security training programs including random phishing email simulations are sent out monthly to help foster a culture of security awareness and vigilance within the organisation. Users who do not pass their phishing tests will be required to go through remedial training within 10 days; any users who do not complete their training within the initial 10 days are sent reminders periodically.



Such training data is able to inform the IS Security Team of high risks areas and assist with improving training programs to help employees recognise and avoid cybersecurity threats. In response, we have also implemented a Phish Alert Report Button to allow employees to quickly report suspicious emails, enabling the IT team to address potential threats before they can cause harm and raise an overall awareness on cybersecurity risks.

Seeing Machines also has an established IS Security Forum. The forum meets on a regular basis and is used to communicate security activities, incidents and to provide IS Security related feedback to the Seeing Machines IS Security Manager. The IS Security Forum is designed to have a representative from each department for the organisation to gain a comprehensive understanding of security needs and challenges across the organisation. In doing so, our IS Security Manager can be better equipped to develop security measures, policies and procedures that are tailored to specific needs or risks of each department.

We have a number of policies and systems in place to help with identifying, detecting and preventing data security risks, including:

- Acceptable Use Policy
- Access Management Policy
- Role Based Access Control
- Secure Log On and Access Logging
- Regular IT Systems patching and maintenance
- IT System maintenance
- IT Systems Protections including
 - Endpoint Monitoring
 - Intrusion Detection Systems
 - Data Loss Protection
- Physical Protections including physical access
 - Controls and USB and other restrictions
- Data Classification Policy
- Annual Security Awareness Training
- Automated Phishing Tests
- Insider Risk Reports

Seeing Machines holds ISO27001:2022 and TISAX Level 2 (Trusted Information Security Assessment Exchange) certifications. Our ISO27001 compliance is audited annually by a third party which helps us to validate and continually improve our processes/policies and procedures related to data security risk.

Recruiting & Managing a Global, Diverse & Skilled Workforce

Employees that require a work visa

Metric	Response	Code
Percentage of employees that require a work visa	22.56%	TC-S1-330a.1



Description of any potential risks of recruiting employees that require a work visa and how the entity manages these risks.

Seeing Machines' head office is in Canberra, Australia. It also has offices in Melbourne (Australia), Arizona, Dallas and Michigan (USA), Germany, the Netherlands, the United Kingdom and Japan. In total, Seeing Machines employs approximately 500 staff. Our diverse workforce brings a wealth of benefits including diversity in thinking and experiences which leads to innovative ideas and perspective. The organisation's Legal and People and Culture teams are structured in a business partner model to ensure that employees within each business unit and function have a dedicated resource to effectively provide support and address any applicable employment-related questions and issues.

Our workforce is very diverse, including 22.56% who are foreign nationals and many who hold dual or multiple citizenship. Because Seeing Machines works with technology and customers who are subject to export control laws, including those of Australia and the United States, Seeing Machines faces a risk that it may need to exclude certain employees from working on certain projects or with certain technology. Seeing Machines has put in place organizational and technical controls to manage this risk and additionally has obtained exemptions from certain provisions of the *Discrimination Act 1991 (ACT)* and the *Equal Opportunity Act 2010 (Vic)* to be able to comply with applicable export control laws. During the reporting period, Seeing Machines sought and was granted a renewal to our exemption from certain operations of the *Discrimination Act 1991 (ACT)*, in order to comply with export control laws. Our proactive approach to ensure that both national security and human rights risks are addressed without compromising on either demonstrates our drive to build an ethical, sustainable and competitive environment for all stakeholders.

Seeing Machines is committed to ensuring a safe and healthy environment for all our employees; we strictly adhere to all applicable laws for our employees' health, safety and wellbeing. During this reporting period, Seeing Machines conducted a mandatory training session on Modern Slavery for all staff, with a key focus on what Modern Slavery is, the risks of Modern Slavery in our operations and supply chains, the steps Seeing Machines takes to mitigate these risks, and the role Seeing Machines employees can play in addressing such risks. The purpose of the training was to raise awareness on Modern Slavery and reinforce ways in which an employee can report concerns about potential violations of law, including Modern Slavery practices. The training was attended by over 300 employees live, with the recording published on our Company intranet for all current and new employees to refer to.

In the workplace, Seeing Machines encourages all employees to voice any concerns they may have, and we work to build an environment of open communication between employees and their managers. We organise regular events focused on multiculturalism and diversity to bridge communication gaps between colleagues and teams, and to foster an inclusive work environment that values diversity. All new Seeing Machines employees are paired with a 'buddy' under our corporate buddy system, which is designed to help new employees integrate smoothly into the company through regular check-ins. Through our buddy system, new recruits are able to feel more connected and at ease in navigating their new corporate environment and are able to better understand the company work culture and policies in place. To mitigate the challenges of remote working, time zone differences and communications with overseas employees, Seeing Machines also leverages technology by utilising collaboration and project management tools such as Slack and Jira to ensure streamlined communication and allow tracking of project progress.



Employee engagement as a percentage: Disclosure shall include a description of methodology employed.

Metric	Response	Code
Employee engagement as a percentage	Not Available	TC-S1-330a.2

Seeing Machines did not conduct an engagement survey in the reporting period. FY24 represented a year of transformation for Seeing Machines which presented an opportunity to establish a new foundation for measuring employee engagement. Given the substantial changes both organisationally and along with the completion of a major acquisition, the leadership team chose to focus on setting the groundwork to ensure future survey results are as relevant and impactful as possible.

Seeing Machines recognises the value of gauging employee engagement and are committed to implementing a new employee engagement strategy, and establishing a meaningful baseline, enabling us to track improvements and act on feedback in a way that truly reflects our evolving organisation going forward.

Racial & Ethnic Data

Metric	Response	Code
Percentage of diversity group representation for executive management	Not Available	TC-S1-330a.3

Seeing Machines recognises and celebrates the value and contribution everyone brings to our workplace and appreciates the value of attracting employees from different backgrounds. Seeing Machines acknowledges the benefits of a diverse workforce and seeks to create and maintain an inclusive workplace that values diversity in gender, age, language, disability, ethnicity including Aboriginal and Torres Strait Islander and Native American heritage, cultural background, sexual orientation, gender identity, immigrant status, intersex status, and religious beliefs. This extends to valuing and respecting differences in education, work experience, occupation, social-economic background, marital status and whether an individual has family or carer responsibilities. Seeing Machines ensures that every individual is respected regardless of their background, cultures, nationalities, ways of working or lifestyle.

At Seeing Machines, we work to achieve the objectives set out in our Diversity policy, which aims to embed a commitment to diversity within its systems and culture. Seeing Machines' Diversity Policy outlines our commitment to cultivate diversity through:

- Recruiting from a diverse pool of candidates for all positions, including senior management and the Board.
- Ensuring our advertised employment opportunities are open and accessible to all and are committed to providing reasonable adjustment to enable candidates to participate in our selection processes and were successful, to support them to work with us.
- Cultivating a workplace culture characterised by inclusive practices and behaviours for the benefit of all employees.



- Providing improved employment and career development opportunities for women, people with disabilities, people who identify as of Aboriginal and Torres Strait Islander and Native American heritage, and people from non-English speaking backgrounds.
- Creating a work environment that values and utilises the contributions of employees with diverse backgrounds, experiences, and perspectives through improved awareness of the benefits of workforce diversity and successful management of diversity.
- Communicating awareness in all staff of their rights and responsibilities with regards to fairness, equity and respect for all aspects of diversity.
- Aligning company policies to enable and protect diversity in the workplace.

DE&I at Seeing Machines

During this reporting period, Seeing Machines strengthened their diversity, equity, and inclusion efforts through the creation of working groups within our Social Cohesion and Community Group, the "Social Machine." The purpose of the working group is to bring employees together to plan, implement, and promote meaningful initiatives, fostering a unified approach to DE&I across all regions.

The Social Machine plays a key role in shaping our DE&I strategy by advising the executive team and the People & Culture function on policies, programs, and practices that impact inclusivity. Throughout the reporting period, the Social Machine brought the Seeing Machines community together in observance of significant DE&I events such as R U OK Day, Tech Women meetings, International Women’s Day, International Women in Engineering Day, Harmony Day, National Reconciliation Week, and International Pride Day.

Gender

Metric	Response	Code
Percentage of gender representation for executive management	Male - 73.33% Female 26.67%	TC-S1-330a.3
Percentage of gender representation for non-executive management	Male - 81.82% Female - 18.18%	TC-S1-330a.3
Percentage of gender representation for technical staff	Male - 80.63% Female - 19.37%	TC-S1-330a.3
Percentage of gender representation for all other employees	Male - 49.74% Female - 50.26%	TC-S1-330a.3

Seeing Machines is committed to fostering an inclusive and diverse workplace, where gender neutrality in policies and processes is paramount. Seeing Machines remains committed to supporting gender diversity within our workforce. We continue to prioritise inclusive hiring practices that attract and retain talented individuals of all genders, ensuring equitable opportunities across all roles and locations.

Our evolving group-wide initiatives, such as gender-neutral parental leave, equitable hiring practices, and practices around internal movements and promotions, reflect our efforts towards creating an equitable and



inclusive culture for all employees. The implementation of these policies, coupled with planned training for our employees and leaders, will enhance awareness and reporting in FY25.

International Women’s Day

On International Women’s Day, Seeing Machines hosted events to celebrate the achievements of our women colleagues. This also created an opportunity to acknowledge the influential women in our lives outside of the workplace. During these celebrations, Seeing Machines employees had the opportunity to hear from our Chair, Kate Hill, and then Head of People & Culture, Lisa Buckley, who shared inspiring messages on the importance of recognizing and appreciating the women around us. We hosted events to acknowledge and celebrate the contributions of our female and female-identifying staff as well as the females in our lives and collected donations to support mothers and female-caregivers in need. We also provided our employees with a summary of our gender pay gap reporting submitted to the Workplace Gender Equality Agency (WGEA) of the Australian Government.

International Women in Engineering Day

Seeing Machines highlighted several women within the company who work in engineering roles or collaborate closely with engineering teams, once again celebrating their contributions to the team and beyond. This initiative promotes women’s empowerment and celebrates the achievements of women at Seeing Machines.

Intellectual Property Protection & Competitive Behaviour

Metric	Response	Code
Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behaviour regulations	0	TC-SI-520a.1

Managing Systemic Risks from Technology Disruptions

Metric	Response	Code
Number of performance issues	2	TC-SI-550a.1
Number of service disruptions	4	TC-SI-550a.1
Number of total customer downtime	788.56 license days	TC-SI-550a.1
Description of business continuity risks related to disruptions of operations	See note	TC-SI-550a.2

Seeing Machines’ principal customer facing system is Guardian Live. The license basis is cloud subscription on a capacity basis.

During this reporting period, Guardian Live experienced 360 minutes of scheduled downtime, 2 performance issues which lasted 315 minutes in total, and 4 service disruptions which lasted 570 minutes hours in total. Each service disruption affected 1221 customer accounts. Neither performance issue affected any customer accounts, and our web application was still accessible for all accounts. Scheduled releases affected all 1221



customer accounts by design. Despite the disruptions and scheduled releases, there were no financial costs incurred by the company.

510 minutes of the service disruptions experienced by Seeing Machines were caused by outages, including AWS' Global outage, which were beyond the control of Seeing Machines. Other disruptions relate to database connection issues or AWS maintenance, which were resolved by the Seeing Machines' Information Systems Team within 30 minutes of the issue.

As for the 2 performance issues, one was caused by a delay in file processing due to an AWS credentialing service failure. Whilst the issue affected analyst classification of events, the Guardian Live web application remained live throughout the interruption. The second performance issue lasted for 15 minutes and was due to system problems affecting the back-end API for analysts, which prevented event classification. Like the first issue, all other services (including the website) remained operational, and no data was lost. The APIs were updated to resolve the problem.

Description of business continuity risks related to disruptions of operations:

The 24/7 Guardian and Support Centre is responsible for providing 24/7 monitoring services to all Seeing Machines Guardian units. Continuing the operations for Guardian and Support Centre is critical to Seeing Machines' mission and values – to save lives.

Business continuity risks related to disruptions of operations include:

- Power/internet outages
- Loss of staff
- Loss of building facilities and/or physical assets, or access to those
- Loss of IT systems, or access to those
- Loss of communications

Seeing Machines implements measures to manage such business continuity risks including maintaining redundancy in the servers hosting Guardian Live, redundancy in operations with Guardian Centres in Tucson, Arizona, Melbourne, and Canberra, and the ability for staff to work remotely and at a dedicated off-site emergency location. The tools and services used by the Guardian and Support Centres are all in the cloud reducing reliance on presence in one location to continue operations. Additionally, disaster recovery solutions like automated backups and failover systems help maintain data integrity and availability during unexpected events.

Seeing Machines undertake regular risk assessments and business impact analyses to identify potential vulnerabilities and their overall effect on operations. These assessments inform the development of our comprehensive business continuity plan (BCP) that outlines specific actions to be taken by all Seeing Machines employees during various types of disruptions. We updated our BCP during this reporting period to outline:

- Policies and provision that have been put in place, to prevent/minimise the risk of any events disrupting normal operations;
- Key people, systems and other resources required and procedures to be followed, in case a disruptive incident should occur; and
- Decision-making procedures and thresholds in relation to invoking the BCP.



The BCP provides the over-arching framework that explains critical priorities, key scenarios and other background rationale to the plan itself. The BCP is accessible to all staff and will be updated throughout the year upon any change to the business or where opportunities for improvement are identified after a simulation exercise. Our Business Continuity process in its entirety is reviewed every 6-12 months and optimised according to best-practice techniques as well as feedback from staff involved.

Additionally, Seeing Machines maintains a suite of insurance policies, with comprehensive coverage that includes public and product liability, cyber, property, travel and the like, to support business continuity. Each policy is carefully considered to ensure adequate coverage to allow the Company to swiftly recover and return to normalcy after unforeseen disruptions.

Activity Metrics

Metric	Response	Code
Number of Licenses or subscriptions	Currently 647 users are licensed in various tools however core licenses are Microsoft 365, NetSuite, Concur, CultureAmp, FCM, Lucid, TeamViewer, Google Workspace and Atlassian Cloud.	TC-SI-000.A
Percentage cloud-based	100%	TC-SI-000.A
Data processing capacity	>473 CPU Cores - Seeing Machines utilises dynamic scaling, so active cores will vary based on load requirements.	TC-SI-000.B
Percentage outsourced	80%	TC-SI-000.B
Amount of data storage	>10PB	TC-SI-000.C
Percentage outsourced	96.00%	TC-SI-000.C