



Modern Slavery Act Statement 2025

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, 2024 to June 30, 2025 (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 third 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 4.2 million cars and more than 60 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 boasts one of 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 and a wholly owned subsidiary of Seeing Machines Limited. Seeing Machines is headquartered in Canberra, Australia with staff located in other parts of Australia, USA, UK, Germany, the Netherlands 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).

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 2025, Seeing Machines had a global headcount of 399 employees, 25.81% of whom were located outside Australia. Our total revenue for the fiscal year ended June 30, 2025 was US\$63,336,946.

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

Seeing Machines continues to maintain a relatively limited geographic footprint and has not expanded beyond what we previously reported in our 2023 and 2024 Modern Slavery Statements. We do not operate directly in countries with a high risk of modern slavery and our employees are located in low-risk countries, and engaged in professional and technical roles that reflect the nature of our business. In July 2024, Seeing Machines acquired Asaphus Vision GmbH, a Berlin-based technology company, which as now been merged into Seeing

Machines Germany GmbH. Seeing Machines Germany GmbH operates in Germany, which is recognised as a country with a low prevalence of modern slavery due to its strong regulatory environment and effective enforcement of labour standards. The company's workforce consists of highly skilled professionals engaged in technical roles, further reducing the likelihood of exploitative labour practices such as forced labour or child labour. Based on these factors, the risk of modern slavery associated with this acquisition is considered minimal.

Our risk assessments indicate that our principal exposure to modern slavery risk arises from our manufacturing supply chain, and certain outsourced professional services, particularly where these are sourced from countries with a higher risk profile compared to Australia.¹ While we do not consider our direct operations to pose a risk of causing or contributing to modern slavery practices, we acknowledge the potential for Seeing Machines to be indirectly linked to such practices through the geographic location of parts of 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. This is primarily due to the outsourcing of manufacturing of our Guardian system components-including controller, vibration motor, and front facing and driver facing camera- to manufacturers and suppliers located in China, Taiwan, and Indonesia. 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 typically 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.

Given the highly skilled technical nature of the goods and services we procure, whether in manufacturing, installation or engineering services, the risk of child labour and other severe forms of modern slavery vulnerabilities remains low. We seek to engage with reputable organisations who have established and robust modern slavery policies or procedures that align with our own standards. Our suppliers are subject to verification processes to ensure their compliance with modern slavery legislation and ethical frameworks. Despite operating a global supply chain, these factors collectively contribute to our overall assessment that the risk of modern slavery within our supply chain remain 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. Seeing Machines is committed to upholding the highest standards of ethical conduct and human rights across all aspects of our business and supply chain.

a. Our Policies in Relation to Slavery and Human Trafficking

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. All policies are accessible to our employees and form part of Seeing Machines' broader governance and compliance framework. The policies 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

¹ Seeing Machines utilises the Walk Free Foundation's Global Slavery Index in assessing country risk: <https://www.walkfree.org/global-slavery-index/>.

- 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. These frameworks inform our employees, suppliers and any relevant third parties that we engage of Seeing Machines' standards with respect to human rights, assist with recognizing when such standards are not being met and know how to raise a grievance or complaint. Our commitment to address modern slavery is also 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. By regularly reviewing and strengthening these frameworks, Seeing Machines strives to ensure that its commitment to eliminate modern slavery remains at the forefront of its business practices.

b. Our Operations and Staff

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 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. During the reporting period, Seeing Machines launched a new Employee Assistance Programme (EAP) provider. This initiative further supports the wellbeing of our workforce by offering confidential counselling and support services. By prioritising employee welfare and access to assistance, we reinforce our commitment to maintaining a safe, supportive, and ethically responsible working environment.

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. To support this commitment, our Work, Health and Safety (WHS) function maintains a dedicated WHS legal register, which is regularly updated to ensure compliance with all applicable legislation, including European laws. This register underpins our proactive approach to workplace safety and legal compliance.

We also provide robust reporting mechanisms to uphold transparency and accountability. All concerns and requests relating to WHS incidents and reports are directed 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. Through the ESM portal and STOPline (Seeing Machines' whistleblower hotline), employees are also encouraged to report any concerns, including suspected breaches of policy, unethical behaviour, or modern slavery risks. 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 Excellence team through the portal, with appropriate records and logs being maintained and with the ability to produce reports and analyse trends. These processes ensure that employees have clear, confidential, and accessible channels to raise concerns without fear of retaliation. 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.

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. 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 certain high risk customer engagements. 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.

Suppliers involved in production, manufacturing, or delivering customised products or services to Seeing Machines' specifications are subject to enhanced scrutiny due to their higher risk geographic profile. These suppliers must complete a vendor qualification process, which is an audit conducted by our Quality and Procurement team to ensure compliance with our standards. The audit includes an assessment of modern slavery risks and Code of Conduct obligations, requiring evidence of a modern slavery statement and/or processes to address such risks within their supply chain. Suppliers must nominate a responsible individual for CSR policy covering child labour, human rights, slavery, and forced labour; failure to do so results in failing the audit. Vendors undergo initial and annual reassessments, which may involve on-site visits or self-assessment surveys, and are required to submit a vendor survey form and self-assessment scorecard each year. 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.

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 reviews or 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.

The Board of Directors maintains oversight of supply chain risks through the Risk, Audit and Finance Committee, and receives regular updates from our General Counsel. If required, the Board of Directors will be informed of risks of a particular third party and proposed mitigations. 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. We respect and protect whistleblowers and do not tolerate retaliation.

d. Assessing our Effectiveness

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

Seeing Machines continues to evolve and mature as a company. Our focus remains on maintaining awareness of 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.

This Statement remains a key reference point for evaluating the progress of our frameworks and processes aimed at improving the effectiveness of actions to mitigate modern slavery risks within our supply chain. We are committed to enhancing supplier transparency regarding risks in their own supply chains by continuing to educate our staff on what to look for during supplier reviews and onboarding.

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.

While no formal training on modern slavery was conducted during this reporting period, following last year's mandatory training for all staff, Board members, and senior management, our Modern Slavery Policy remains readily available for employees to view and review at any time. The previous training covered the definition and risks of modern slavery, practical examples relevant to our operations and supply chain, and guidance on reporting concerns without fear of retaliation. The training materials are accessible on our company intranet for reference by both current and new employees. Additionally, staff may request further training through our ESM Portal as needed. We intend to deliver refreshed training session in the future to reinforce awareness and understanding of modern slavery risks across the organisation.

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 22 December 2025.

In respect of Seeing Machines (UK) Limited this Statement was approved by its sole director on 22 December 2025.

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 22 December 2025.



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