



**BEOWULF MINING PLC**

**SOCIAL MEDIA POLICY**

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## ADMINISTRATION

Approved Poster(s):	Marketing Director, Marketing Manager, Marketing & E-Commerce Director and such other person(s) as an Authorising Person shall nominate
Authorising Persons:	CEO
Social Media Platforms:	BOWWOLF MINING PLC website Websites - individual group member websites Twitter – individual group member feeds Instagram – individual group member feeds LinkedIn – individual group member feeds
Record Keepers:	Approved Posters
Records:	Social Media Record
Policy Date:	18 January 2022



## SUMMARY

### 1. PURPOSE OF THIS POLICY

This Policy has been adopted by the Company for the purposes of managing dissemination of information by Beowulf Mining plc and its subsidiaries (together, the **Company**) over social media. It should be read in conjunction with the Company's Inside Information Policy.

The Policy is intended to assist the Company in managing dissemination of information through various media channels in such a way as to ensure that it maintains ongoing compliance with its disclosure obligations under the EU Market Abuse Regulation ((EU) No. 596/2014) as retained in UK law following Brexit (**MAR**) and associated laws and regulations and the AIM Rules for Companies (**AIM Rules**).

The Policy is subject to review by the Board and will be updated from time to time as necessary. Please ensure you are reading the most recent version (available from the Company Secretary).

### 2. KEY MESSAGES

- Employees should generally take care not to behave in a way when using social media which reflects badly on the Company.
- In order to comply with its obligations under the AIM Rules and MAR, the Company needs to manage dissemination of information appropriately and through the proper channels.
- Any information that is required to be released under the AIM Rules or MAR (including inside information and "routine" announcements) must be released via an official regulatory news service (**RNS**) before it is released on any other channel or in any other form. Inside information must be treated in accordance with the Company's Inside Information Policy.
- RNS announcements must be signed off by a director of the Company and released either by the Company's PR advisers, if any, or its Nominated Adviser.
- Where appropriate and in accordance with this policy, Company information may be released through approved social media channels but only through the Company's official accounts with those channels and only by Authorising Persons, Approved Posters or External Approved Posters (where posting falls within their remit).
- Any posts which concern the Company its business, customers, suppliers, plans, expectations, developments, directors, financial performance or other financial matters or any other matter concerning the Company which does not fall within the "Safe List" (see section 4 below) may not be posted without sign off from an Authorising Person (see below) save for RNS announcements which have already been released and must be posted on the Company's website in accordance with MAR and/or the AIM Rules.
- The Company's business should not be discussed in any internet forums or chat rooms.
- Login details for the Company's social media accounts must be kept confidential.
- Only persons who have been authorised to do so may post material on social media on behalf of the Company.
- The Company must guard against any leaking of inside, price sensitive information (by any method) concerning the Company. If information is leaked, the Company will be required to release full details to avoid false markets which may seriously prejudice its interests.



- Failure to comply with the AIM Rules and/or MAR can have serious repercussions for the Company and may result in, amongst other things, a suspension of trading in the Company's securities on AIM, reputational damage and disciplinary action by AIM or the Financial Conduct Authority (**FCA**).



# SOCIAL MEDIA POLICY

## 1. APPLICATION OF THIS POLICY

This Policy applies to all staff, directors and consultants of the Company and its subsidiaries (together, the **Company**) and any external parties who disseminate information on Social Media Platforms on behalf of the Company.

Approved Posters and External Approved Posters will be notified of this designation by the Company.

## 2. GENERAL BEHAVIOURS

An employee's behaviour on any social networking or other internet site must be consistent with the behaviour required of employees generally. Where it is possible for users of a social media site to ascertain who you work for, then you should take particular care not to behave in a way which reflects badly on the Company. Inappropriate or disparaging comments about the Company, employees or customers / suppliers, etc. will be treated as misconduct. Because social media interactions can be copied and widely disseminated in a way that you may not be able to control, the Company will take a particularly serious view of any misconduct that occurs through the use of social media, inside or outside working hours.

You must not operate a social media account or profile that purports to be operated on or on behalf of the Company without express permission to do so from your manager.

Should you come across any article or comments on-line that you feel the Company may wish to respond to, you should bring this to the attention of your Line Manager immediately so that it can be dealt with in an appropriate manner. Under no circumstances should you attempt to respond yourself.

## 3. THE COMPANY'S SOCIAL MEDIA PLATFORMS

The Company uses various Social Media Platforms upon which it has official accounts to promote itself and its products and services.

In addition, the Company uses its websites to directly share relevant material. The websites of individual group members and will be included in the term "Social Media Platforms" for the purposes of this Policy.

Social Media Platforms may be added (or removed) from time to time with the approval of the Chief Executive Officer. Any new Social Media Platforms used by the Company from time to time shall be included within the remit of this Policy.

Each Approved Poster must "follow" or "like" the relevant group company for which they are responsible on each of the Social Media Platforms to assist monitoring posts appearing on them.

## 4. SOCIAL MEDIA PLATFORM LOGIN PROTECTIONS

Only Approved Posters, Authorising Persons and other persons who require access to the Company's Social Media Platforms and are approved in writing (including by email) by an Authorising Person (e.g. IT support) (**External Approved Posters**) may have access to the login and administration details for the Social Media Platforms.

The Social Media Platform login details must be kept confidential and not shared (even internally) save with Approved Posters, Authorising Persons or External Approved Posters.



Whenever an Approved Poster or Authorising Person ceases to be an Approved Poster or Authorising Person, the login password for each of the relevant Social Media Platforms should be changed as soon as reasonably practicable and shared with the Approved Posters for that platform and any other Authorising Person (and any other persons previously authorised by the Authorising Person who still require access). On expiry or termination of a contract with an External Approved Poster, again the Social Media Platform passwords to which they had access should be changed.

## 5. POSTING ON SOCIAL MEDIA PLATFORMS

No libellous, discriminatory or otherwise offensive, inappropriate or irrelevant materials may be posted on the Company's Social Media Platforms.

Subject to the above, if (and only if) it forms part of their role to maintain a stream of content on the Company's Social Media Platforms, Approved Posters and External Approved Posters may post general posts and articles concerning the industry in which the Company operates, and general posts and articles relating to the Company's operations which are of a general nature (**Safe List**), without prior authorisation from an Authorising Person.

Any post which concerns potentially sensitive information in relation to the Company, its business, its securities, customers, suppliers, joint ventures, plans, expectations, developments, transactions, contracts, directors, financial performance or other matters or any other matter concerning the Company (**Potentially Sensitive Material**) may not be posted by an Approved Poster or External Approved Poster without sign off from an Authorising Person (save for RNS announcements which have already been released and must be posted on the Company's website in accordance with MAR and/or the AIM Rules). The sign off from the Authorising Person may be given in writing or by email.

An Authorising Person must not sign off on the posting of any Potentially Sensitive Material unless he is satisfied that:

- it does not constitute or contain inside information;
- it is not otherwise required to be released under MAR and/or the AIM Rules via RNS prior to release elsewhere;
- it does not breach any confidentiality obligations; and
- it is otherwise appropriate for posting.

If it is not obvious that the Potentially Sensitive Information does not contain any inside information or any information that might otherwise require dissemination under the AIM Rules and/or MAR, the Authorising Person must consult the Company's Nomad and/or the Company Secretary for guidance prior to posting the material in question. The Company should then follow their advice.

The Authorising Person must send a copy of any authorisation of Potentially Sensitive Information given to an External Approved Poster to the Approved Poster.

The Approved Poster should record the authorisation and release of any Potentially Sensitive Material (whether by themselves or an External Approved Poster) in the Social Media Record (see Appendix 1) as soon as possible. Each member of the Group should maintain a separate Social Media Record.

## 6. SOCIAL MEDIA PLATFORMS AND THE NOMINATED ADVISER

The Nominated Adviser should be notified of all Social Media Platforms as soon as reasonably possible following their activation.



The Social Media Record should be made available to the Nomad on request by an Authorising Person. The Company may agree to share the Social Media Record with the Nomad on an ongoing regular basis. This arrangement may be approved by an Authorising Person.

#### **7. EXTERNAL APPROVED POSTERS**

It must be a condition of the terms of retention of any External Approved Poster that they comply with the terms of this Policy in relation to Social Media Platforms.

#### **8. CHAT ROOMS & MESSAGE BOARDS**

No person should engage in online discussions regarding the Company or its affairs or its securities through internet chat rooms or message boards. This is especially important in the case of investor sites.

#### **9. ACCIDENTAL POSTINGS**

In the event of any material being posted on a Social Media Platform which is either inappropriate or in breach of this Policy, the AIM Rules or MAR, any person who notes such content must inform an Authorising Person immediately.

The material should be deleted from the Social Media Platform as soon as possible.

If the post did or may have contained inside information or other information required to be initially released via RNS under the AIM Rules or MAR, the Authorising Person must inform the board of directors and the Nomad immediately to assess what action should be taken (e.g. release of a formal announcement via RNS).

#### **10. BREACH OF POLICY**

Breach of this policy may lead to disciplinary action.



