

## BARTON GOLD HOLDINGS LIMITED

### SOCIAL MEDIA POLICY

#### BACKGROUND

Barton Gold Holdings Limited (**Company**) has the following Social Media Policy (**Policy**) to regulate the use of social media by people associated with the Company or its subsidiaries. The Policy covers the use of electronic media for engagement within and between the Company and the market by directors, officers and employees (**Restricted Persons**).

To preserve the reputation and integrity of the Company, this Policy will apply to the wide range of technologies commonly referred to as 'social media' which fundamentally are no different to other forms of communication, but do represent a risk as well as an opportunity because they can connect large numbers of people with relative ease. The rationale for the Policy is to manage the risks associated with the use of technology platforms and tools of this nature.

#### SOCIAL MEDIA DEFINITION

Social media means online social networking or Web 2.0 technologies services and tools used for publishing, sharing and discussing information, including without limitation blogs or web logs, electronic forums or message boards, micro-blogs (eg: Twitter™), photo sharing sites (eg: Flickr®), social bookmarking sites (eg: Delicious™, Digg™, Reddit™) social networking websites (eg: Facebook®, Instagram®, Snapchat®, Whatsapp®, LinkedIn®, Google+™) video sharing sites (eg: YouTube™), virtual worlds (eg: Second Life®) and wikis (eg: Wikipedia®) and any other electronic media that allow individual users to upload and share content regardless of format.

#### SCOPE OF POLICY

The Policy outlines requirements for compliance with confidentiality, governance, legal, privacy and regulatory parameters when using social media to conduct Company business.

This Policy aims to:

- (a) inform appropriate use of social media tools for the Company;
- (b) promote useful market engagement through the use of social media;
- (c) minimise problematic communications; and
- (d) manage the inherent challenges of speed and immediacy.

This Policy should be read in conjunction with other relevant policies and procedures of the Company and is not intended to cover personal use of social media where the author publishes information in their personal capacity and not on behalf of, or in association with the Company and no reference is made to the Company, its directors, employees, policies and products, suppliers, shareholders, other stakeholders or Company related issues.

#### LEGISLATIVE & POLICY FRAMEWORK

The Restricted Persons are expected to demonstrate standards of conduct and behaviour that are consistent with relevant legislation, regulations and policies, including the following non-exhaustive list:

- (a) *Corporations Act 2001* (Cth) (**Corporations Act**);
- (b) ASX Listing and Operating Rules;
- (c) the Company's employment contracts; and
- (d) the Company's Trading Policy.

## **POLICY REQUIREMENTS**

When using social media in relation to the Company, Restricted Persons are expected to:

- (a) adhere to Company policies and procedures;
- (b) behave with caution, courtesy, honesty and respect;
- (c) comply with relevant laws and regulations;
- (d) only disclose information that has already been released to the market; and
- (e) reinforce the integrity, reputation and values the Company seeks to foster.

The following content is not permitted under any circumstances:

- (a) content that has not been released to the market;
- (b) abusive, profane or language of a sexual nature;
- (c) content not relating to the subject matter of that blog, board, forum or site;
- (d) content which is false or misleading;
- (e) confidential information about the Company or third parties;
- (f) copyright or trade mark protected materials;
- (g) discriminatory material in relation to a person or group based on age, colour, creed, disability, family status, gender, nationality, marital status, parental status, political opinion or affiliation, pregnancy or potential pregnancy, race or social origin, religious beliefs or activity, responsibilities, sex or sexual orientation;
- (h) illegal material or materials designed to encourage law breaking;
- (i) materials that could compromise the safety of any employee;
- (j) materials which would breach applicable laws (*Corporations Act* and regulations, ASX Listing and Operating Rules, defamation, privacy, consumer and competition law, fair use, copyright, trade marks);
- (k) material that would offend contemporary standards of taste and decency;
- (l) material which would bring the Company into disrepute;
- (m) personal details of Company directors, employees or third parties;

- (n) spam, meaning the distribution of unsolicited bulk electronic messages; and
- (o) statements which may be considered to be bullying or harassment.

If you have any doubt about applying the provisions of this policy, the Company Secretary is the correct person to check with prior to using social media to communicate on behalf of the Company. Depending upon the nature of the issue and potential risk, it may also be appropriate to consider seeking legal advice prior to publication.

## **CONFIDENTIAL INFORMATION**

Restricted Persons may only discuss publicly available information. Restricted Persons must not disclose confidential information, internal discussions or decisions of the board, employees, consultants or other third parties.

## **ACCURACY**

Information published should be accurate, constructive, helpful and informative. Restricted Persons must correct any errors as soon as practicable and not publish information or make statements which are known to be false or may reasonably be taken to be misleading or deceptive.

## **IDENTITY**

Restricted Persons must be clear about their professional identity, or any vested interests and must not use fictitious names or identities that deliberately intend to deceive, mislead or lie or participate in social media anonymously or covertly or via a third party or agency.

## **PERSONAL OPINIONS**

Restricted Persons should not express or publish a personal opinion on the Company generally or about Company business via social media and should be mindful of market disclosure rules when discussing or commenting on Company matters. Generally, Restricted Persons should not express personal opinions on Company decisions or business nor be critical of the Company and its personnel. If it is not possible to separate official Company positions from personal opinions, Restricted Persons must either refrain from posting or must use a formal disclaimer to separate interests.

## **PRIVACY**

Restricted Persons should be sensitive to the privacy of others. However, the Company is not required to seek permission from anyone who appears in any photographs, video or other footage before sharing these via any form of social media if it is the copyright owner of the relevant image or footage.

## **INTELLECTUAL PROPERTY**

Restricted Persons will use the Company's own intellectual property where possible and shall obtain prior consent where the Company is not the creator or copyright owner, to use or reproduce copyright material including applications, sound recordings (speeches, music), footage (cinematographic vision), graphics (graphs, charts, logos, clip-art), images, artwork, photographs, publications or musical notation.

## **PERSONAL PRIVACY**

Restricted Persons should protect their personal privacy and guard against identity theft.

## **MODIFICATION AND MODERATION**

Restricted Persons should ensure that any social media sites created or contributed to can be readily edited, improved or removed and appropriately moderated.

## **RESPONSIVENESS**

The Company will endeavour to specify the type of comments and feedback that will receive a response and clearly communicate a target response time. Restricted Persons are required to make it easy for audiences to reach the Company and/or its subsidiaries by publishing appropriate company telephone numbers, generic emails, LinkedIn, and Facebook accounts.

## **MONITORING**

The Company reserves the right, for legal compliance purposes, to monitor social media usage on its systems without advance notice and consistent with any applicable state, federal or international laws. The Company may be legally required to produce logs, diaries and archives of social media use to judicial, law enforcement and regulatory agencies and will comply with any relevant requests. Restricted Persons and other users should govern themselves accordingly.

## **ENFORCEMENT**

Company employees breaching this policy may be the subject of disciplinary action, performance management or review. Serious breaches may result in suspension or termination of employment or association. The Company reserves the right to remove, where possible, content that violates this Policy or any associated policies.

Failure to comply with this Policy may be considered cause for termination of employment.

## **CORPORATIONS ACT**

The requirements imposed by this Policy are separate from, and additional to, the legal prohibitions in the Corporations Act. Directors, officers and employees should be aware that they can be charged with criminal offences under the rules and regulations associated with the prevention of market manipulation, false trading, market rigging and misleading and deceptive conduct, all of which apply at law regardless of this Policy.

Adopted by the Board on 3 February 2022.