Social Media Policy

April 2021
Approved by the Board 15 March 2021

1. Background

Lunnon Metals Ltd (**Lunnon Metals** or the **Company**) has the following Social Media Policy (**Policy**) to regulate the use of social media by people associated with Lunnon Metals or its subsidiaries. The Policy covers the use of electronic media for engagement within and between the Company and the market by directors and employees, the Company's contractors (including subcontractors) and employees of the Company's contractors, joint venture partners (who have agreed to be bound by the Policy) and suppliers (**Restricted Persons**).

To preserve the reputation and integrity of Lunnon Metals and its subsidiaries, 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.

2. 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 (e.g.: Twitter™), photo sharing sites (e.g.: Flickr®), social bookmarking sites (e.g.: Delicious™, Digg™, Reddit™) social networking websites (e.g.: Facebook®, Instagram®, Snapchat® , WhatsApp®, LinkedIn®, Google+™) video sharing sites (e.g.: YouTube™), virtual worlds (e.g.: Second Life®) and wikis (e.g.: Wikipedia®) and any other electronic media that allow individual users to upload and share content regardless of format.

3. 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 is intended to apply to both Lunnon Metals and any subsidiaries. References to the Company in this Policy should be read as referring to both Lunnon Metals and its subsidiaries, if appropriate.

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 Lunnon Metals and no reference is made to its directors, employees, policies and products, suppliers, shareholders, other stakeholders or Company related issues.

4. 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) Lunnon Metals' employment contracts; and

(d) Lunnon Metals' Trading Policy.

5. Policy Requirements

(a) When using social media in relation to Lunnon Metals, Restricted Persons are expected to:

(i) seek prior authorisation from the Chair or Managing Director;

(ii) adhere to Company policies and procedures;

(iii) behave with caution, courtesy, honesty and respect;

(iv) comply with relevant laws and regulations;

(v) only disclose information that has already been released to the market; and

(vi) reinforce the integrity, reputation and values the Company seeks to foster.

(b) Restricted Persons may enter into a separate standing arrangement with Lunnon Metals to enable the Restricted Person to use social media in certain circumstances without obtaining the consent on every occasion from the Chair or Managing Director. Such a standing arrangement, could include, for example, the posting of announcements that Lunnon Metals has released on the platform of the ASX.

(c) The following content is not permitted under any circumstances:

(i) content that has not been released to the market;

(ii) language which may be considered abusive, profane or of a sexual nature;

(iii) content not relating to the subject matter of that blog, board, forum or site;

(iv) content which is false or misleading;

(v) confidential information about the Company or third parties;

(vi) copyright or trade mark protected materials;

(vii) 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;

(viii) illegal material or materials designed to encourage law breaking;

(ix) materials that could compromise the safety of any employee;

(x) 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);

(xi) material that would offend contemporary standards of taste and decency;

(xii) material which would bring the Company into disrepute;

(xiii) personal details of Company directors, employees or third parties;

(xiv) spam, meaning the distribution of unsolicited bulk electronic messages; and

(xv) statements which may be considered to be bullying or harassment.

If you have any doubt about applying the provisions of this policy, the Chair or Managing Director 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.

6. Prior Authorisation

Authorisation from the Chair or Managing Director must be obtained before a Restricted Person can use social media including but not limited to uploading content or speaking on behalf of the Company.

7. Media Statements

Statements or announcements cannot be made through social media channels unless authorised by the Chair or Managing Director. No Restricted Person may respond directly if approached by media for comment through social media and must refer the inquiry to the Chair or Managing Director.

8. Expertise

No Restricted Person may comment outside his or her area of expertise.

9. 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.

10. 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.

11. 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.

12. 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 Lunnon Metals and its personnel. If it is not possible to separate official Lunnon Metals positions from personal opinions, Restricted Persons should consider using a formal disclaimer to separate interests.

13. 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.

14. Intellectual Property

Restricted Persons will use the Company's own intellectual property where possible and shall obtain prior consent where Lunnon Metals 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. Restricted Persons will also typically seek permission before publishing or uploading the intellectual property of a third party or before linking to another site or social media application.

15. Defamation

Restricted Persons will not comment, contribute, create, forward, post, upload or share content that is scurrilous, malicious or defamatory. Restricted Persons will endeavour to be courteous, patient and respectful of the opinions of others, including detractors and the discourteous.

16. Discrimination

Restricted Persons will be conscious of anti-discrimination laws and must not publish statements or information which may be discriminatory in a human rights sense.

17. Language

Restricted Persons will remain mindful of language and expression and not lapse into excessive use of colloquialisms, having regard to an international audience.

18. State of Mind

Restricted Persons must not use social media when irritated, upset or tired.

19. Personal Privacy

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

20. 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.

21. Responsiveness

Lunnon Metals 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.

22. 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. Lunnon Metals 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.

23. General Responsibilities

Restricted Persons should seek advice or authorisation from the Chair or Managing Director on using social media or, if unsure about applying the provisions of this Policy, should register social media accounts with the Chair or Managing Director, understand and comply with the provisions in this Policy and any End User Licence Agreements, seek training and development for using social media and maintain records of email addresses, comments, 'friends', followers and printed copies or electronic 'screen grabs' when using externally hosted sites to the extent practicable. Each Restricted Person is responsible for adhering to the Lunnon Metals Social Media Policy.

24. Enforcement

All content published or communicated by or on behalf of Lunnon Metals using social media must be recorded (including the author's name, date, time and media site location) and kept on record. The Company will actively monitor social media for relevant contributions that impact on the Company or its subsidiaries, and their officers, operations or reputation.

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. Lunnon Metals reserves the right to remove, where possible, content that violates this Policy or any associated policies.

25. Corporations Act

The requirements imposed by this Policy are separate from, and additional to, the legal prohibitions in the Corporations Act. Directors, officers, consultants 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.

26. Failure to comply

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

This policy will be published and promoted to personnel of Lunnon Metals through www.lunnonmetals.com.au and the appropriate Policy Manuals for the Company.