

TORQUE METALS LIMITED
(ACN 621 122 905)
(“COMPANY”)

SOCIAL MEDIA POLICY

1. INTRODUCTION

The Company expects its employees and contractors to maintain a certain standard of behaviour when using social media in relation to the Company.

The aim of this policy is to inform employees and contractors of the Company of their responsibilities when using social media both on behalf of the Company and in their own personal capacity.

1.1 Scope

This policy outlines requirements for compliance with confidentiality, governance, legal, privacy and regulatory parameters when using social media to:

- (a) conduct the Company’s business such as:
 - (i) maintaining a profile page for the Company on any social media or business networking site;
 - (ii) making comments on any social media or business networking sites for and on behalf of the Company;
 - (iii) writing or contributing to a blog and/or commenting on other people’s or business’ blog posts for and on behalf of the Company; and/or
 - (iv) posting comments for and on behalf of the Company on any public and/or private web-based forums or message boards or other internet sites; or
- (b) communicate information about the Company in their personal capacity.

1.2 Definitions

- (a) Social media includes all internet-based publishing technologies. Most forms of social media are interactive, allowing authors, readers and publishers to connect and interact with one another. The published material can often be accessed by anyone.
- (b) Social media may include (although is not limited to):
 - (i) social networking sites (e.g.: Facebook, Myspace, LinkedIn, Bebo);
 - (ii) video and photo sharing websites (e.g.: Instagram, Snapchat, Flickr, YouTube);
 - (iii) blogs, including corporate blogs and personal blogs;
 - (iv) blogs hosted by media outlets (e.g.: ‘comments’ or ‘your say’ features on news websites);

- (v) micro-blogging sites (e.g.: Twitter);
- (vi) wikis and online collaborations (e.g.: Wikipedia);
- (vii) forums, discussion boards and groups (e.g.: Google groups, HotCopper);
- (viii) vod and podcasting;
- (ix) instant messaging (including SMS and WhatsApp); and
- (x) geo-spatial tagging (e.g.: Foursquare).

1.3 Legislative & Policy Framework

- (a) The Company will immediately release through the relevant exchanges any information or major developments which a reasonable person would expect to have a material impact on the Company's share price, or a reasonable investor is likely to use as part of the basis for making investment decisions, subject to any exceptions under the applicable laws. This disclosure has to occur without delay and before the information is released to others. As such, public disclosures must only be made by authorised spokespersons and in accordance with this Policy.
- (b) Correspondingly, employees and contractors are expected to demonstrate standards of conduct and behaviour that are consistent with relevant legislation, regulations and policies, including the following non-exhaustive list:
 - (i) Corporations Act 2001 (Cth);
 - (ii) ASX Listing and Operating Rules;
 - (iii) the Company's employment contracts; and
 - (iv) the Company's Security Trading Policy.

2. PROFESSIONAL USE OF SOCIAL MEDIA

2.1 Authorisation

No director, employee or contractor of the Company is to engage in social media as a representative or on behalf of the Company unless they first obtain written approval from the Managing Director.

2.2 Appropriate conduct

- (a) If any employee or contractor of the Company is directed to contribute to or participate in any form of social media related work, they must act in a professional manner at all times and in the best interests of the Company.
- (b) Once authorised to engage in social media as a representative or on behalf of the Company, employees must:
 - (i) only disclose information that has already been released to the market through the ASX announcements platform, which includes, without limitation, pictures or comments posted on social media;

- (ii) ensure that all content published is accurate and not misleading and complies with all relevant company policies and correct any published information that is misleading and/or not accurate as soon as practicable;
- (iii) comment only on their area of expertise and authority;
- (iv) ensure comments are respectful of the community in which they are interacting online;
- (v) comply with relevant laws and regulations; and
- (vi) adhere to the Terms of Use of the relevant social media platform/website, as well as copyright, privacy, defamation, contempt of court, discrimination, harassment and other applicable laws.

2.3 Inappropriate conduct

If an employee or contractor is authorised to engage in social media as a representative or on behalf of the Company, they must not:

- (a) post content that has not been released to the market;
- (b) post or respond to material that is offensive, obscene, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist, infringes copyright or is otherwise unlawful;
- (c) use or disclose any confidential information relating to the Company or its business partners or other third parties;
- (d) communicate any information, (regardless of whether it is confidential or public knowledge), about business partners of the Company or other third parties without their prior authorisation or approval to do so;
- (e) 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;
- (f) express or publish a personal opinion on the Company generally or about the Company's business via social media, that if it is not possible to separate official Company positions from personal opinions, employees and contractors should consider using a formal disclaimer to separate interest; or
- (g) make any comment or post any material that might otherwise cause damage to the Company's reputation or bring it into disrepute.

3. PERSONAL ACCOUNTS

3.1 General

The Company acknowledges that employees and contractors may have their own personal social media accounts or participate on social media platforms in their personal capacity. However, the same responsibilities set out in this policy apply to employees and contractors in relation to communicating or disclosing information about the Company and its operations while using those personal social media

accounts or platforms. For example, employees and contractors must adhere to the prohibitions listed at paragraph 2.3 when considering releasing or communicating information about the Company.

When providing general information or an opinion about the Company without prior approval from the Company, employees and contractors must ensure they clearly state the information or opinion being provided is in their personal capacity and not information or an opinion provided by the Company.

3.2 Specific Prohibitions

Unless prior approval from the Company is given or if done in the usual course of employment, employees and contractors must not:

- (a) release or communicate photos taken on-site, whether on a social media platform or specifically to a person or entity if that person or entity is not currently in employment with the Company;
- (b) use the Company's trademarks, brands, logos or images of other employees on any social media platform (including the use of hashtags); or
- (c) speak to the media (whether online or in person) on behalf of the Company.

4. INSIDER TRADING ON SOCIAL MEDIA

4.1 Insider Trading Generally

- (a) A person will be guilty of insider trading if:
 - (i) that person possesses information in relation to a company which is not generally available to the market and if it were generally available to the market, would be likely to affect the price or value of that company's securities (i.e. information that is 'price sensitive'); and
 - (ii) that person:
 - A. buys or sells securities in the company;
 - B. procures someone else to buy or sell securities in the company; or
 - C. passes on that information to a third party where that person knows or ought reasonably to know that the third party would be likely to deal in the securities of procure someone else to deal in the securities of the company.
- (b) For more details on insider trading generally, please see the Company's Security Trading Policy.

4.2 Social Media related Insider Trading

- (a) Examples of how social media may be used for insider trading include, but are not limited to:
 - (i) posting price sensitive information on social media – this could include photos of or information about material drilling results, mine sites and cargo shipments;

- (ii) blogging about the Company's financial performance (prior to the Company making an announcement to the market about its financial performance);
 - (iii) posting about a potential or upcoming significant change in senior management; and
 - (iv) uploading photos or videos of new and significant development proposals such as new technology or discoveries.
- (b) All of the examples above relate to information that has not yet been released to the market, and including posting or otherwise disclosing the information to specific groups or individuals (e.g. via 'direct message').

5. PRIVACY

Employees and contractors 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.

6. INTELLECTUAL PROPERTY

Employees and contractors 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. Employees and contractors 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.

7. MODIFICATION AND MODERATION

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

8. 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. Employees and contractors 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, Twitter and Facebook accounts.

9. 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. Employees and contractors and other users should govern themselves accordingly.

10. ENFORCEMENT

All content published or communicated by or on behalf of the Company 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.

The Company's 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.

11. 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.

12. BREACH OF POLICY

- (a) All employees and contractors of the Company must comply with this policy. If an employee or contractor becomes aware of any breach of this policy, whether done by themselves or by another employee or contractor, and whether done intentionally or unintentionally, they should report it to the Managing Director immediately. Any breach of this policy will be treated as a serious matter and may result in disciplinary action including termination of employment or (for contractors) the termination or non-renewal of contractual arrangements.
- (b) Other disciplinary action that may be taken includes, but is not limited to:
 - (i) issuing a formal warning;
 - (ii) directing people to attend mandatory training;
 - (iii) suspension from the workplace; and/or
 - (iv) permanently or temporarily denying access to all or part of the Company's computer network.
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