



Social Media Policy



SYRAH RESOURCES

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1. INTRODUCTION

Syrah Resources (“Syrah” or “the Company”) is an Australian Securities Exchange listed industrial minerals and technology company with its flagship Balama Graphite Operation in Mozambique and a downstream Active Anode Material Project in the United States. Syrah’s vision is to be the world’s leading supplier of superior quality graphite and anode material products, working closely with customers and the supply chain to add value in battery and industrial markets.

2. PURPOSE

This Policy has been developed to manage the inherent risks that can arise in recognition of employee participation and use of Social Media in connection with workplace and non-workplace Social Media use.

Social Media in the Workplace

Social Media is a key communication channel and can be used effectively to promote the interests of the Syrah Group.

However, when used inappropriately, Social Media can adversely impact the Syrah Group, including through the potential disclosure of confidential information and/or intellectual property, causing reputational damage, undermining investor confidence, breaching the law or exposing the Syrah Group and individuals to liability.

Accordingly, all workplace and employee Social Media use relevant to the Syrah Group must comply with this Policy.

Social Media Use by Individuals During Their Personal Time

The Syrah Group recognises that employees and contractors use Social Media in their personal time.

However, when any online communication:

- a) is made by a person who is identifiable, or could reasonably be identifiable, as an employee, contractor, or representative of the Syrah Group; and/or
- b) includes reference to the Syrah Group, its activities, products, operations, employees, stakeholders or any other work-related issue,

that communication must comply with this Policy.

3. SCOPE

This Policy applies to all employees, contractors and representatives of the Syrah Group.

This Policy does not apply to online communications published by the Syrah Group’s official Social Media accounts by Syrah Group representatives who are specifically authorised to communicate via Social Media platforms on behalf of Syrah.

4. SOCIAL MEDIA COMMUNICATIONS MUST ONLY INCLUDE PUBLICLY AVAILABLE INFORMATION

Employees, contractors and representatives of the Syrah Group must ensure that all communications and other Social Media activities contain only publicly available information about the Syrah Group. Information on any of the Syrah Group's authorised Social Media accounts or company websites may be considered publicly available.

Under no circumstances can confidential, commercially sensitive, proprietary or inside information be shared via Social Media in any context, regardless of the intended audience and whether the communication is intended for public or private consumption.

Information is considered confidential when it is not readily available to the public. Some examples of non-public information include:

- a) information about production forecasts or results;
- b) plans or future projects;
- c) events or activities occurring on site;
- d) commercial transactions or negotiations; or
- e) any dispute or disagreement.

The majority of information communicated internally about the Syrah Group is confidential. If there is any doubt about confidentiality, that information must not be communicated via Social Media. For further information, please refer to the Securities Trading Policy.

5. OTHER REQUIREMENTS FOR SOCIAL MEDIA USE

Employees, contractors and representatives of the Syrah Group must ensure that all communications and other Social Media activities (whether for personal reasons or referencing Syrah):

- a) are respectful, accurate and in accordance with the highest standard of professional and ethical behaviour;
- b) comply with all Syrah Group policies;
- c) comply with all applicable laws, customs and regulations; and
- d) remain politically neutral, non-religious and uncontroversial

When accessing Social Media using Syrah Group infrastructure, all usage must comply with the Syrah Information Technology Policy at all times. For further information, please refer to Information Technology Policy.

6. PROHIBITED SOCIAL MEDIA ACTIVITY

Employees, contractors or representatives of the Syrah Group must not share any material or engage in any activity on Social Media that may (whether for personal reasons or referencing Syrah):

- a) damage the reputation, brand image or commercial interests of the Syrah Group, its employees, contractors and/or stakeholders;
- b) be disrespectful, insensitive or contrary to the laws or customs of any country in which the Syrah Group operates;

- c) directly or indirectly defame, harass, discriminate against or bully any person or company including any Syrah Group representative, supplier or customer;
- d) contain or disclose non-publicly available information (see section 3).

The following activities may only be conducted with prior written approval in accordance with this Policy (see section 7):

- a) create Social Media accounts representing the Syrah Group (or any entity within the group);
- b) share any photo of Syrah Group assets, infrastructure and/or operations; or
- c) include the Syrah Group's logo, name, slogans or other trademarks on any Social Media content.

7. OBTAINING APPROVAL

All requests for approvals under this Policy should be sent via email to: social@syrahresources.com.au

Syrah reserves absolute discretion when determining whether to grant any approval under this Policy.

8. COMPLIANCE AND BREACH

The Syrah Group reserves the right to review Social Media platforms to ensure compliance with this Policy.

Employees are encouraged to report inappropriate information discovered on Social Media or breaches of this Policy to their Immediate Manager, a member of the Executive Committee or via the Whistleblower channels. For further information, please refer to the Whistleblower Policy.

A breach of this Policy may lead to disciplinary action, which may range from a warning up to termination of employment, depending on the severity of the breach. If an individual breaks the law, they may also be held personally liable.

9. DEFINITIONS

- a) Continuous Disclosure Policy means the Syrah policy bearing that name, as amended from time to time;
- b) Policy means this Social Media Policy;
- c) Related Bodies Corporate means related bodies corporate as that term is defined in the Corporations Act;
- d) Social Media refers broadly to any online media platform which allows for user participation, networking, interaction or publishing. Commonly used Social Media platforms include, but are not limited to, Facebook, YouTube, Twitter, LinkedIn, Hot Copper, Snapchat, Pinterest, Reddit, WeChat, Instagram and group discussion forums;
- e) Syrah means Syrah Resources Limited (ACN 125 242 284);

- f) Syrah Group means all Related Bodies Corporate of Syrah and includes, without limitation, Twigg Exploration & Mining Limiteda, Syrah Resources & Trading DMCC, Syrah Global DMCC, Syrah Technologies LLC.

Syrah Resources Limited			
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