



Social Media Policy



SYRAH RESOURCES

www.syrahresources.com.au

enquiries@syrahresources.com.au

03 9670 7264

CONTENTS

1. INTRODUCTION	2
2. PURPOSE	2
3. SCOPE	2
4. PERMISSIBLE SOCIAL MEDIA ACTIVITY	2
5. PROHIBITED SOCIAL MEDIA ACTIVITY	3
6. OTHER REQUIREMENTS FOR SOCIAL MEDIA USE	3
7. OBTAINING APPROVAL	4
8. COMPLIANCE AND BREACH	4
9. DEFINITIONS	4

1. INTRODUCTION

Syrah Resources Limited (“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 Facility 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

The purpose of this Social Media Policy (“Policy”) is to outline how Syrah personnel must conduct themselves online to manage the inherent risks associated with the use of Social Media.

This Policy is for the mutual protection of Syrah and its employees, contractors and representatives, and is not intended to prevent or discourage online activity.

3. SCOPE

This Policy applies to all employees, contractors and any other representatives of the Syrah Group, referred herein as “personnel”.

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

4. PERMISSIBLE SOCIAL MEDIA ACTIVITY

Social Media is a key communication tool and can be used effectively to promote the interests of the Syrah Group. Employees are encouraged to positively engage on Social Media platforms by sharing publicly available Company information and their professional experiences, in adherence to this Policy.

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 and/or exposing the Company and individuals to liability, among other consequences.

Personnel can share information on Social Media so long as it is not considered confidential, commercially sensitive, proprietary or inside information.

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

- a) information about production forecasts or results;
- b) information about financial budgeting or performance;
- c) plans or future projects;
- d) events or activities occurring on site;
- e) commercial transactions or negotiations;
- f) changes in personnel and roles;
- g) any dispute or disagreement.

Information published on any of the Syrah Group’s authorised Social Media accounts or Company websites may be considered publicly available.

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 any questions or enquiries regarding confidentiality please email social@syrahresources.com.au, or for further information regarding confidential and inside information, please refer to the [Securities Trading Policy](#).

5. PROHIBITED SOCIAL MEDIA ACTIVITY

When representing the Syrah Group, personnel must not share any material or engage in any online activity 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 other 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, company or institution;
- d) contain or disclose non-publicly available information (see section 4).

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;
- b) share any photo of Syrah Group assets, infrastructure and/or operations; or
- c) include the Company's logo, name, slogans or other trademarks on any Social Media content.

6. OTHER REQUIREMENTS FOR SOCIAL MEDIA USE

When representing the Syrah Group, all personnel must ensure that their communications and other Social Media related activities:

- 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 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 Company's Information Technology Policy at all times, with special attention to cybersecurity risks such as phishing, malware and impersonation. For further information, please refer to the [Information Technology Policy](#).

The Company recognises that personnel may use Social Media in their personal time. All online activity must comply with this Policy when the 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, customers, stakeholders or any other work related issue.

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;
- b) share any photo of Syrah Group assets, infrastructure and/or operations; and/or
- c) include the Company'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 including the proposed Social Media post wording along with any relevant media attached. Syrah reserves absolute discretion when determining whether to grant any approval under this Policy.

8. COMPLIANCE AND BREACH

The Company 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 Human Resources representative. Anonymous reports can also be made 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. The Company may also direct you to immediately remove any comments, content or images posted that contravenes any Company policy.

9. DEFINITIONS

- a) **Policy** means this Social Media Policy;
- b) **Related Bodies Corporate** means related bodies corporate as that term is defined in the Corporations Act;
- c) **Social Media** refers broadly to any online media platform or technology which allows for user participation, networking, interaction or publishing. Commonly used Social Media platforms include, but are not limited to, Facebook, YouTube, Xr, TikTok, LinkedIn, Hot Copper, Snapchat, Pinterest, Reddit, WeChat, Instagram and group discussion forums, as well as emerging technologies such as AI-generated content and virtual reality environments;
- d) **Syrah** means Syrah Resources Limited (ACN 125 242 284);
- e) **Syrah Group** means all Related Bodies Corporate of Syrah and includes, without limitation, Twigg Exploration & Mining Limited, Syrah Resources & Trading DMCC, Syrah Global DMCC, and Syrah Technologies LLC.

Syrah Resources Limited			
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Document Control	Jemma Pititto – Executive Assistant

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