



ATLANTIC LITHIUM LIMITED

**SOCIAL MEDIA
POLICY**

Introduction

To preserve the reputation and integrity of Atlantic Lithium Limited (“the Company”) 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.

This Policy document should be read in conjunction with the detailed procedures and rules documented by the Company for the use of social media, as appended to this Policy.

Scope of Policy

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

This Policy is intended to apply to both the Company and its subsidiaries. References to the Company in this Policy should be read as referring to both the Company and its subsidiaries, as appropriate.

This Policy, and its associated procedures and rules, aim 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;
- 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 intended to apply to all Directors, employees and contractors associated with the Company (“**Restricted Persons**”). This Policy 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 any other Company-related issues.

Policy Requirements

When using social media, Restricted Persons are expected to:

- a. seek prior authorisation from the Chief Executive Officer;
- b. adhere to the Company’s policies and procedures as documented;
- c. behave with caution, courtesy, honesty and respect;
- d. comply with all relevant laws and regulations;
- e. only disclose information that has already been released to the market;
- f. 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, AIM rules and regulations, any applicable UK or EU regulations (such as the Market Abuse Regulations, 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's Chief Executive Officer is the correct person to check with prior to using social media to communicate on behalf of the Company. If the Company's Chief Executive Officer is not available, the Company's Chief Operating Officer or the Company Secretary should be consulted. Depending upon the nature of the issue and potential risk, it may also be appropriate to consider seeking legal advice prior to publication.

General Responsibilities

Restricted Persons should seek advice or authorisation from the Chief Executive Officer, on using social media or if unsure about applying the provisions of this Policy, should register social media accounts with the Chief Executive Officer, 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 Company's Social Media Policy.

DETAILED PROCEDURES and RULES FOR THE USE OF SOCIAL MEDIA

1.1 These procedures and rules are in place to minimise the risks to the Company through use of social media, and should be read in conjunction with the Company's Social Media Policy.

1.2 These procedures and rules deals with the use of all forms of social media, including Facebook, LinkedIn, Twitter, Google+, Wikipedia, Whisper, Instagram, Vine, Tumblr and all other social networking sites, internet postings, the Company's website, non-regulatory news feeds and blogs. It applies to use of social media for business purposes as well as personal use that may affect the Company in any way.

1.3 These procedures and rules covers all Directors, employees, officers, consultants, contractors, interns, casual workers and agency workers.

2 PERSONNEL RESPONSIBLE FOR IMPLEMENTING THE POLICY

2.1 The Board of Directors (the "**Board**") has overall responsibility for the effective operation of the Company's social media procedures, but has delegated day-to-day responsibility for their operation to the Chief Executive Officer and/or Chief Operating Officer.

2.2 Responsibility for monitoring and reviewing the operation of these procedures and making recommendations for change to minimise risks lies with the Chief Executive Officer and/or Chief Operating Officer who will review these procedures at least annually to ensure that they meet legal

requirements and reflects best practice.

2.3 All Company personnel have responsibility for operating within the boundaries of these procedures, ensuring that everyone associated with the Company understands the standards of behaviour expected of them, and taking suitable action when behaviour falls below its requirements.

2.4 Whilst the Company's Chief Executive Officer is likely to delegate the use of social media on behalf of the Company to one or two specific individuals, all Company personnel are responsible for the success of these procedures and should ensure that they take the time to read and understand them. Any misuse of social media should be reported to the Chief Executive Officer, Chief Operating Officer, Chair and/or Company Secretary. Questions regarding the content or application of these procedures should be directed to the Chief Executive Officer, Chief Operating Officer, Chair and/or Company Secretary.

2.5 If the London Stock Exchange considers that the Company has breached the AIM Rules for Companies (the "**AIM Rules**"), it will investigate and take such disciplinary action as it considers appropriate.

2.6 The Board may be required to issue a clarification notification where comments made via social media by Directors or persons on behalf of the Company are inconsistent with notifications made via a RIS.

2.7 If the Board or Chief Executive Officer, Chief Operating Officer and/or Company Secretary are unsure regarding any posts they wish to publish via non-regulatory news feeds, on the Company's website or via any other form of social media, the Company shall take advice from its legal advisers and nominated adviser before approving any such public communication.

3 COMPLIANCE WITH RELATED POLICIES AND AGREEMENTS

3.1 Social media should never be used in a way that breaches any of the Company's other policies, including the AIM Rules for Companies, MAR Compliance Code and the Company's Share Dealing Policy. If an internet post would breach any of the Company's policies in another forum, it will also breach them in an online forum. For example, Company personnel are prohibited from using social media to:

- (a) breach the Company's obligations with respect to the rules of relevant regulatory bodies, in particular the AIM Rules and/or the Market Abuse Regulation (Regulation 596/2014) ("**MAR**"), further details of which are set out at paragraph 5 below;
- (b) breach any obligations contained in those policies relating to confidentiality;
- (c) harass or bully other personnel in any way;
- (d) unlawfully discriminate against other personnel or third parties;
- (e) breach the Data Protection Policy (for example, never disclose personal information about a colleague online); or
- (f) breach any other laws or regulatory requirements.

3.2 Company personnel should never provide references for other individuals on social or professional networking sites, as such references, positive and negative, can be attributed to the organisation and create legal liability for both the author of the reference and the organisation.

3.3 Company personnel who breach any of the above policies will be subject to disciplinary action up to and including termination of employment.

4 PROHIBITED USE

4.1 These procedures and rules have been adopted by the Company and communicated to all personnel to prevent them:

- (a) from disclosing any information relating to the Company or its business, including but not limited to the Company's clients, the operation of its business or any business opportunities, without prior approval of the Chief Executive Officer and/ or Chief Operating Officer.
- (b) from making any social media communications that could damage the Company's business interests or reputation, even indirectly;
- (c) from using social media to defame or disparage the Company, other personnel or any third party; to harass, bully or unlawfully discriminate against other personnel or third parties; to make false or misleading statements; or to impersonate colleagues or third parties;
- (d) from expressing opinions on the Company's behalf via social media, unless expressly authorised to do so by the Company's Chief Executive Officer and/ or Chief Operating Officer;
- (e) from posting comments about sensitive business-related topics, such as the Company's performance, or do anything to jeopardise the Company's trade secrets, confidential information and intellectual property. Company personnel must not include the Company's logos or other trademarks in any social media posting or in their profile on any social media;
- (f) from publishing the contact details of business contacts made during the course of employment, as they are the Company's confidential information, and Company personnel are not permitted to add business contacts made during the course of their employment to personal social networking accounts;

4.2 Any misuse of social media should be reported to the Chair, Chief Executive Officer, Chief Operating Officer and/or Company Secretary.

5 REGULATORY REQUIREMENTS

5.1 The AIM Rules, as published by the London Stock Exchange, provide that a company must make an announcement to the public via an approved regulatory information service ("**RIS**") without delay of any developments which are not public knowledge and which, if made public, would be likely to lead to a significant movement in the company's share price. This may include matters concerning a change in the company's financial condition, sphere of activity, performance of business or its expectation of its performance.

5.2 Where the Company is required to make a RIS notification, the notification must be made no later than the information is published elsewhere. The fact that information released through other outlets is or may become publicly available is not a substitute for making a notification under the AIM Rules. Consequently, the requirement to make a notification under the AIM Rules will not be satisfied by disclosure via social media and the Company must make RIS announcements.

5.3 All regulatory information must be disclosed to the market in a fair and timely manner and the formal channels of disclosure must be adhered to. A company's securities can be suspended from trading where there has been an unusual share price movement because of an inequality of information provided to the market. The London Stock Exchange can investigate and take such disciplinary action as it considers appropriate in such an instance.

5.4 It is also an offence under MAR to unlawfully disclose such information, and premature or selective disclosures or disclosures designed to cause volatility in the company's share price (eg. a leak of confidential information), which may constitute market abuse under MAR, falling under the regulation of the Financial Conduct Authority, who may impose penalties (including unlimited fines) on both the Company and its directors for market abuse.

6 BUSINESS USE OF SOCIAL MEDIA

6.1 If any Company personnel are required to speak on behalf of the organisation in a social media environment, any such individual must still seek approval for such communication from the Chief Executive Officer or Chief Operating Officer who may require them to undergo training before they do so and impose certain requirements and restrictions with regard to their activities.

6.2 Likewise, if any Company Personnel are contacted for comments about the organisation for publication anywhere, including in any social media outlet, they should direct the enquiry to the Chief Executive Officer and/or Chief Operating Officer and not respond without written approval.

6.3 The use of social media for business purposes is subject to the remainder of these procedures.

7 GUIDELINES FOR RESPONSIBLE USE OF SOCIAL MEDIA

7.1 The Company should make all Company personnel aware that:

(a) they should make it clear in social media postings, or in their personal profile, that they are speaking on their own behalf, including writing in the first person and use a personal e-mail address.

(b) they should be respectful to others when making any statement on social media and be aware that they are personally responsible for all communications which will be published on the internet for anyone to see.

(c) if they disclose their affiliation with the Company on their profile or in any social media postings, they must state that their views do not represent the Company's views (unless they are authorised to speak on the Company's behalf as set out in paragraph)

(d) Company personnel should be made aware that their profile and any content they post is consistent with the professional image the Company presents to governments, shareholders, suppliers, landholders, business partners, other resource industry participants and other stakeholders.

(d) if they are uncertain or concerned about the appropriateness of any statement or posting, they should refrain from posting it until it is specifically approved by the Chief Executive Officer or Chief Operating Officer.

(e) if they see social media content that disparages or reflects poorly on the Company, they should contact the Chair, Chief Executive Officer, Chief Operating Officer or Company Secretary.

8 MONITORING

The Company reserves the right to monitor, intercept and review, without further notice, personal activities using its IT resources and communications systems, including but not limited to social media postings and activities, to ensure that its rules are being complied with and for legitimate business purposes and that all Company personnel consent to such monitoring by their use of such resources and systems.

Employees and Directors will report to the Company, and the Company will maintain, details of those registered with share or financial bulletin boards, including a list of individuals subject to the media and their usernames.

9 RECRUITMENT

The Company may use internet searches to perform due diligence on candidates in the course of recruitment. Where this is carried out, it will act in accordance with the Company's data protection and equal opportunities obligations.

10 BREACH OF SOCIAL MEDIA POLICY, PROCEDURES AND/OR RULES

10.1 The Company should make all personnel aware that:

(a) any breach of its Social Media Policy or Social Media Procedures and Rules may result in disciplinary action up to and including dismissal. Any personnel suspected of committing any such breach will be required to co-operate with the Company's investigation, or any

investigation undertaken by the London Stock Exchange or regulatory body, which may involve handing over relevant passwords and login details.

- (b) they may be required to remove any social media content that the Company considers to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.