

# Social Media Policy

## 1 Introduction

Black Rock Mining Limited (**Black Rock**) and its subsidiaries (together **Black Rock Group** or **Company**) appreciates and recognises the growing popularity of participation in online social media. Black Rock Group acknowledges the rights of individuals to participate in social media activities in their personal time to keep in touch with their friends, share information or become involved in online discussions. However, employees of Black Rock Group have employment obligations when communicating online about the Company, its projects, fellow co-workers, key stakeholders and other work-related issues.

This policy outlines the strict obligations when communicating about the Company online.

## 2 Scope

This policy applies to all employees and contractors (**employees**) of Black Rock Group.

This policy does not apply to:

- a. An individual's personal use of social media where no reference is made to Black Rock Group, their employment or employer and/or such usage has no connection to the workplace, work-related matters or stakeholders; or
- b. Online communications published by Black Rock Group representatives who are specifically authorised to communicate via social media platforms on behalf of the Company.

## 3 Policy

Employees may consider their personal comments posted on social media to be private, but these communications are often available to a larger audience than the author may realise. Published content can be shared to wider audiences, even if the content is deleted. Posts can be tracked to individuals, even when sharing content anonymously.

Online communication or publication that directly or indirectly refers to Black Rock Group, its projects, employees or other stakeholders, has the potential to damage Black Rock Group's reputation and interests. The below outlines appropriate and inappropriate shared content.

### 3.1 Social Media

This policy will refer to social media as a service or channel that allows you to publish content, including images, over the internet. Social media can include both private and open platforms to share content.

The below social media platforms included but not limited to in this policy:

Platform Type	Platform Name
Social Networks	Facebook (Meta), LinkedIn, X
Messaging Platforms	WeChat, Messenger, Snapchat, WhatsApp, Signal
Media Sharing Networks	Instagram, YouTube, TikTok, BeReal
Content Curation	Pinterest
Corporate Networks	SharePoint, Microsoft Teams
Review Platforms	WordPress, Yelp, Google, Reddit, Quora
Recruitment Platforms	Seek, Indeed

### 3.2 Posting Principles

When participating or publishing posts on social media in a personal capacity employees must:

- a. not disclose Black Rock Group confidential information. Information is considered confidential when it has not been made readily available to the public. If an employee is unsure their disclosed content is confidential, they should speak to their manager or the Black Rock Group Human Resources Department (**Group HR**) before posting.
  - i. Employees risk breaching the Trading Policy if disclosing information online is likely to have any material effect on the price or value of the Company's securities; and
  - ii. The Code of Conduct outlines the nature of confidential information and an individual's responsibility in protecting the information.
- b. not use Black Rock Group's logo or any subsidiary company or stakeholder branding without prior approval from Black Rock Managing Director & Chief Executive Officer (**MD & CEO**);
- c. not disclose or communicate any information regarding corporate or site incidents as it has the potential to compromise incident investigations and impact organisational learning;
- d. not communicate anything about the Company that may damage its reputation, brand image or commercial interests. Employees communicating opinions (even positive) can have significant reputational and commercial impact. Staff should not post any opinions about the status of the Company's business or business interests without prior approval from the MD & CEO;
- e. not represent or communicate anything on behalf of Black Rock Group in the public domain without prior approval from MD & CEO; and
- f. not post any content that would directly or indirectly defame, harass, discriminate against or bully any Black Rock Group employee or stakeholder. Black Rock Group has a zero-tolerance policy towards discrimination, harassment, sexual harassment, bullying, vilification, and victimization as per the Code of Conduct, and Diversity and Inclusion Policy.

### 3.3 Examples

Potential scenarios which may breach this policy include:

- a. posting information on an online forum regarding the Company awarding major contracts to suppliers;
- b. uploading video footage to Facebook of Black Rock Group project sites including incidents or accidents;
- c. releasing any information in regard to a potential cyber security incident;
- d. making derogatory or defamatory comments about Black Rock Group management or other individuals;
- e. posting offensive comments about a work colleague that could constitute harassment; and
- f. disclosing confidential information to a friend or relative outside the organisation via a messaging platform.

Good Practice when using social media includes:

- a. individuals posting under the assumption that content may be viewed by, sent, forwarded, or transmitted to someone other than who was intended to view the communication.
- b. not disclosing other individuals' personal information or images without permission from that individual.
- c. speaking to the Group HR department for guidance if unsure whether a post will breach this policy; and
- d. stepping back, re-reading and thinking about the content and possible implications before posting.

## 4 Responsibility

### 4.1 Employees

Employees including executives, managers, direct employees and contractors:

- a. are responsible for their own communication online;
- b. should not represent or communicate on behalf of Black Rock Group in any public domain without prior approval from the MD & CEO; and

c. should refer to their manager or Group HR immediately if they become aware of potential breaches of this policy.

**4.2 Managers**

Managers must address any potential breach of this policy and/or discuss the matter with the Chief People & Sustainability Officer.

Individuals in executive positions should be mindful of how all posted content, even on their own private media accounts, represents and may impact Black Rock Group and/or its stakeholders.

**5 Breaches**

Breaches of certain sections of this Policy may be punishable under legislation and employees may be personally and legally liable for their social media conduct.

Breaches of this policy may lead to disciplinary action, including termination. The process for disciplinary action is outlined in Black Rock Group policies and guidelines, relevant industrial awards, and agreements.

**6 Relevant Documents**

- Black Rock Code of Conduct
- Diversity and Inclusion Policy
- Trading Policy
- Whistleblower Policy
- Human Resources Policy

**7 Monitoring and Review**

The Board will monitor the content, effectiveness and implementation of this Policy every two years. There may also be independent reviews taken from time to time. Any findings, updates or improvements identified will be addressed as soon as possible.

Everyone covered by the scope of this Policy will be notified of any change made to the Policy, and where required, training will be provided.

**8 Document History**

Version	Version Date	Section	Comments	Approved By
1	03/07/2024		Initial Release	Chief People & Sustainability Officer
2	25/11/2024	Sec 6	Convert to Board Policy, format to company standard, add in s6 Monitor and review every two years.	Black Rock Board