



ACN 149 349 646

## SOCIAL MEDIA POLICY

Personal and professional use of any social media by Galan Lithium Limited (**the Company or Galan**) Personnel must not bring the Company into disrepute, compromise effectiveness at work, imply any Galan endorsement of personal views or disclose, without authorisation, confidential information.

### **Purpose**

Social Media is an online interactive/technical platform that allows people to interact, chat, connect or collaborate online. Each social medium is slightly different, but they are all based on a common idea – “the idea of sharing”.

Galan encourages the use of Social Media and recognises and appreciates the value of Social Media as a tool for Personnel to engage, communicate, learn, share and drive innovation. As Social Media is shared in the public realm, it is vital that Galan’s public reputation, its shareholders, its Personnel and other stakeholders are protected. Therefore, Galan prohibits communication that is abusive, racist, threatening, defamatory, libellous, hateful, insulting, obscene, misleading and/or deceptive, is for commercial or private gain purposes or breaks any law including privacy, defamation and harassment.

This Social Media Policy has been designed to protect and educate Galan Personnel and to promote and encourage the appropriate use of Social Media by Galan Personnel.

Personnel are solely responsible for all comments that they post on Social Media. Individuals making personal comments should make it clear that the views expressed are their own and are not a representation of the views of Galan.

This policy should be read in conjunction with Galan’s other policies and guidelines surrounding Conflicts of Interest, Email and Internet Use, Confidentiality, Code of Conduct, Securities Trading and Shareholders Communication.

### **Definitions**

**Personnel** means any Galan director, officer, employee, consultant or contractor. Includes any employee of a consultant, contractor or sub-contractor and applies to personnel associated with Galan and its subsidiaries.

**Social Media** means interactive electronic forums or online media where people are communicating, posting, participating and sharing. For the purposes of this Policy, Social Media extends, but is not limited, to:

- material communicated electronically, whether written, photographic, video or audio which is accessible by more than the individual poster alone;
- Facebook, YouTube, Twitter, Instagram, Myspace, Snapchat, LinkedIn, Wikipedia, Flickr and similar services;
- blogs, social networking sites, instant messaging, social bookmarking, podcasting, media sharing and collaborative editing websites;
- any other forum eg. Hot Copper which might be classified reasonably as social media as the term is generally understood; and
- any other forum available for public comment.

**Price Sensitive Information** means any information which a reasonable person would expect to have a material effect on the price or value of securities of the Client and the expression "material effect on the price or value" will have the same meaning given under section 1042D of the Corporations Act 2001 (Cth).

### **Authorisation and Media Statements**

Written authorisation from the Chairman, Managing Director and/or Company Secretary must be obtained before Personnel can use Social Media to upload any new Galan related content or speaking on behalf of the Galan.

Company statements or announcements cannot be made through social media channels unless authorised by the Managing Director. No Personnel may respond directly if approached by media for comment through social media and must refer the inquiry to the Managing Director or the Chairman.

### **Company Promotion on Personal Social Media Platforms**

All Personnel are encouraged to help promote Galan by engaging in social media by:

- sharing, retweeting posts and commenting in their social networks;
- advocating for Galan and mining in a positive manner by focusing on positive messages about Galan and mining; and
- making valuable and considered posts and tweets to generate/facilitate conversation. Quality is more important than the volume.

This policy does not discourage nor unduly limit Personnel from using Social Media for personal expression or other on-line activities in their personal life.

### **Consequences of Breach**

Personnel need to acknowledge the requirements under both legislation and regulation as to the disclosure of 'Price Sensitive Information'.

Any disclosure, use or misuse of Price Sensitive Information may have serious consequences for Personnel and their associated entities, including investigation by the Australian Securities and Investments Commissioner (ASIC) and possible criminal and civil prosecution. Personnel are not permitted to disclose, use or misuse any 'Price Sensitive Information' relating to Galan or their associated entities.

Breach of this Policy will be dealt with in accordance with the relevant Galan Personnel engagement conditions and may lead to disciplinary action including possible termination of employment and/or engagement. For consultants and contractors who are found to have breached this Policy, there may be consequences including termination of contract.

Where inappropriate use under this policy constitutes a breach of any law, action may also be taken in accordance with that law by Galan or concerned third parties. An individual may be held personally liable for any commentary and/or material which may be defamatory, obscene or proprietary.

This Policy will be reviewed by the Board on an annual basis.

**For and on behalf of the Board**

**Galan Lithium Limited  
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