



MERIDIAN MINING PLC

("COMPANY")

SOCIAL MEDIA POLICY

Adopted by the Board of Meridian Mining plc on 24 April 2026

1 ABOUT THIS POLICY

- 1.1 This policy is in place to minimise the risks to the Company through use of social media.
- 1.2 This policy deals with the use of all forms of social media, including but not limited to Facebook, LinkedIn, Twitter, Instagram, TikTok, Google+, Wikipedia, Whisper, Tumblr and all other social networking sites, internet postings, non-regulatory news feeds and blogs. It applies to use of social media for business purposes as well as personal use, during work hours and in your own time to the extent that may affect the Company in any way.
- 1.3 This policy covers all employees, officers, consultants, contractors, interns, casual workers and agency workers of the Company.
- 1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time. However, employees are expected to have regard to the policy at all times to protect the Company's business interests which may be adversely affected by inappropriate activity on a social media site.

2 PERSONNEL RESPONSIBLE FOR IMPLEMENTING THE POLICY

- 2.1 The board of directors ("**Board**") has overall responsibility for the effective operation of this policy, but has delegated day-to-day responsibility for its operation to the Chief Financial Officer.
- 2.2 Responsibility for monitoring and reviewing the operation of this policy and making recommendations for change to minimise risks lies with the Chief Financial Officer who will review this policy at least annually to ensure that it meets legal requirements and reflects best practice.
- 2.3 Managers have a specific responsibility for operating within the boundaries of this policy, ensuring that all staff understand the standards of behaviour expected of them and taking action when behaviour falls below its requirements. If necessary managers will be given training in order to do this.
- 2.4 All staff are responsible for the success of this policy and should ensure that they take the time to read and understand it. Any misuse of social media should be reported to the Chief Financial Officer. Questions regarding the content or application of this policy should be directed to the Chief Financial Officer.

- 2.5 The Board may be required to issue a clarification notification where comments made via social media by employees, officers, consultants, contractors, interns, casual workers and agency workers of the Company, or persons on behalf of the Company are inconsistent with notifications made via a RIS (as defined below)
- 2.6 If the Board or Chief Financial Officer are unsure regarding any posts that employees, officers, consultants, contractors, interns, casual workers and agency workers of the Company 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 sponsor and/or legal advisers 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 but not limited to the Continuous Disclosure Policy and 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, members of staff 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 UK Listing Rules, the Disclosure Guidance and Transparency Rules and/or the UK Market Abuse Regulation (as enacted through the European Union (Withdrawal) Act 2018 and as amended by the Financial Services Act 2021) ("**UK MAR**"), further details of which are set out at clause 5 below;
 - (b) breach any obligations contained in those policies relating to confidentiality;
 - (c) breach any disciplinary policies or procedures;
 - (d) harass or bully other staff in any way;
 - (e) unlawfully discriminate against other staff or third parties;
 - (f) breach the Data Protection Policy (for example, never disclose personal information about a colleague online); or
 - (g) breach any other laws or regulatory requirements.
- 3.2 Staff 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 Staff who breach any of the above policies, whether through using social media or otherwise, will be subject to disciplinary action up to and including termination of employment.

4 PROHIBITED USE

- 4.1 The Company shall implement the necessary processes and procedures which seek to prevent:
- (a) members of staff 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 Financial Officer;
 - (b) members of staff from making any social media communications that could damage the Company's business interests or reputation, even indirectly;

- (c) members of staff from using social media to defame or disparage the Company, staff or any third party; to harass, bully or unlawfully discriminate against staff or third parties; to make false or misleading statements; or to impersonate colleagues or third parties;
- (d) members of staff from expressing opinions on the Company's behalf via social media, unless expressly authorised to do so by their manager. The Company shall implement training, if required, for members of staff in order to obtain such authorisation;
- (e) members of staff 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. Members of staff must not include the Company's logos or other trademarks in any social media posting or in their profile on any social media;
- (f) the contact details of business contacts made during the course of a member of staff's employment are the Company's confidential information and members of staff 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 Chief Financial Officer.

5 REGULATORY REQUIREMENTS

- 5.1 The Disclosure Guidance and Transparency Rules ("**DTRs**"), as published by the Financial Conduct Authority ("**FCA**"), provide that a company with securities admitted to trading on the Main Market of the London Stock Exchange must announce inside information to the public via an approved Regulatory Information Service ("**RIS**") as soon as possible. Inside information is information of a precise nature which has not been made public, relates directly or indirectly to the Company or its securities, and which, if made public, would be likely to have a significant effect on the price of the Company's securities. 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 (including social media) is or may become publicly available is not a substitute for making a notification under the DTRs and UK MAR. Consequently the requirement to make a notification under the DTRs 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 FCA can investigate and take such disciplinary action as it considers appropriate in such an instance, including imposing financial penalties and public censure.
- 5.4 It is also an offence under UK MAR to unlawfully disclose such information, or make premature or selective disclosures or disclosures designed to cause volatility in the company's share price (e.g. a leak of confidential information), which may constitute market abuse under UK MAR. UK MAR falls 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 a member of staff's duties require them to speak on behalf of the organisation in a social media environment, that individual must still seek approval for such communication from their

manager who may require them to undergo training before they do so and impose certain requirements and restrictions with regard to their activities.

- 6.2 Members of staff who are contacted for comments about the organisation for publication anywhere, including in any social media outlet, must direct the enquiry to the Chief Financial Officer and must not respond without written approval.

- 6.3 The use of social media for business purposes is subject to the remainder of this policy.

7 GUIDELINES FOR RESPONSIBLE USE OF SOCIAL MEDIA

Members of staff:

- 7.1 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.
- 7.2 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.
- 7.3 if they disclose their affiliation with the Company on their profile or in any social media postings, 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 clause 4.1(d)). Members of staff should be made aware that their profile and any content they post is consistent with the professional image the Company present to clients and colleagues.
- 7.4 if they are uncertain or concerned about the appropriateness of any statement or posting, should refrain from posting it until they have discussed it with their manager. As noted above, all posts relating directly to the Company and its business must be approved by the Chief Financial Officer before publication.
- 7.5 should contact the Chief Financial Officer if they see social media content that disparages or reflects poorly on the Company.

8 MONITORING

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

9 BREACH OF THIS POLICY

- 9.1 Breach of this policy may result in disciplinary action up to and including dismissal. Any member of staff suspected of committing a breach of this policy will be required to co-operate with the Company's investigation, or any investigation undertaken by the FCA or other regulatory body, which may involve handing over relevant passwords and login details.
- 9.2 Members of staff 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.