SOCIAL MEDIA POLICY

September 2026

INTRODUCTION

Aim of policy

Sovereign Metals Limited and its subsidiaries (the **Company**) have adopted this Social Media Policy (**Policy**) to promote suitable and professional disclosure of information and other online activities on social media platforms by the Company's directors, officers, employees, contractors and consultants (**Personnel**).

The purpose of this Policy and the attached guidelines (Schedule 2) is to ensure that Personnel understand their obligations when using social media and are informed of the importance of managing risks associated with social media that may impact on the reputation of the Company, its Personnel and may result in a breach of the law or the Company's policies including, but not limited to, the Continuous Disclosure Policy.

This Policy is for the mutual protection of the Company and its Personnel and is not intended to prevent, discourage or unduly limit individual's online activities or expression of personal opinion.

This Policy addresses the following key aspects of social media use:

1. ***confidentiality*** of Company and Personnel information;
2. ***continuous disclosure obligations*** and other disclosure obligations, including reliability of information;
3. ***use on site*** including its impact on confidentiality and continuous disclosure;
4. ***workplace behaviour*** including bullying and harassment;
5. ***reputation*** and culture of the Company with respect to online opinions or activity; and
6. ***official disclosures*** of the Company via the Company's social media accounts.

Application of policy

This Policy applies to all activity on all forms of social media. Refer to Schedule 1 for details of what constitutes "social media" and what activities are covered by the Policy.

Consequences for not adhering to this policy

Breaches of the Policy will be subject to disciplinary action, which may include termination of employment. Any actual or suspected breach of the Policy should be immediately reported to the Company Secretary. Personnel should consult the Company Secretary if they have any concerns or queries regarding the Policy.

POLICY

Confidentiality and continuous disclosure

The Company's securities are publicly are listed on the Australian Securities Exchange (**ASX**) and the Alternative Investment Market of the London Stock Exchange (**AIM**) with a quotation on the OTCQX. Personnel must ensure that all posts and activity on social media comply with applicable continuous disclosure requirements and with any obligations of confidentiality. In particular, activity on social media must comply with the following principles:

(a) Information which may be material to investors (as detailed in Schedule 1) may only be disclosed on social media platforms if it has first been released on ASX and AIM (or any other applicable recognised stock exchanges). For the avoidance of doubt, material information may be disclosed by Authorised Users (defined below) and Personnel on social media once an announcement made by the Company is first released on the ASX and AIM.

(b) Personnel are not to divulge or discuss any confidential or personal information obtained as a result of their position or role with the Company. This includes information regarding the Company's operations, projects, business, prices, financial position, security, or activities.

(c) Personnel must not make posts (including photos) on social media that may be misconstrued or imply an activity, information or an outcome that is not correct or may assist in creating a false or misleading market.

(d) Careful consideration of whether supplemental information is Material and if any uncertainty, Personnel should discuss the supplemental information with the Company Secretary prior to the posting any supplemental information. For example:

(i) if the Company has announced that a drilling programme has commenced, then posting photos of the drill rigs continuing ordinary drilling activities would be permitted, however photos of the drill core or any other photos that may imply the success or failure of the drill programme are not permitted to be posted until the results of the drilling programme have been announced to the market; or

(ii) responses to negative posts on social media may require additional disclosure to the market if incorrect information or assertions have created a false or false market (as may be required by ASX for media reports as per ASX LR 3.1A(2) and GN 8, para 5.8).

(e) Personnel may need to consider whether supplemental information is required to ensure the posts are not misleading or incomplete, or suggestive of material information which has not been disclosed (whether true or not).

(f) Comments on general industry trends or the market may only be made when based on a credible source. For example, comments about price movements by a junior mining company are not considered a suitable source, however reference to comments by a major mining company or an expert in price forecasting, will generally be considered a suitable source.

Social media on project site and use during work hours

The Company believes that all Personnel must undertake a responsible attitude towards the use of social media while working on the project's site. The publishing of any operational or site information may result in the disclosure of confidential information and may result in a breach of the Company's continuous disclosure obligations (discussed above).

In line with these principles, Personnel are prohibited from:

(a) taking photos or videos of the Company's project site and operations; and

(b) posting photos or videos of the Company's project site and operations on any form of social media.

Personnel are only permitted to take photos or videos of project sites and operational activities if required for the proper performance of their duties, or if expressly authorised by senior management.

Authorised Users (defined below) are permitted to take photos or videos of project sites and operational activities in accordance with the performance of their duties but must ensure compliance with section d. i. of this policy above, in that no photos or videos of drill core are posted unless assay results have first been released on the ASX and AIM.

The Company recognises that Personnel might use social media for communication purposes. Personnel are not absolutely prohibited from accessing social media during working hours or on Company premises (except when on site and working, as outlined above). However, Personnel must limit time using social media to reasonable periods of time for example to respond to a message but not to browse social media, and at appropriate times for example during breaks. Personnel must in all cases ensure that social media activity does not adversely impact their efficiency at work or ability to carry out and complete their duties.

Workplace behaviour

Bullying and harassment will not be tolerated in the workplace and will not be tolerated where it occurs on social media. This is regardless of whether it occurs on duty or outside of work hours. Personnel are not to post any adverse or critical content about the Company, other Personnel or individuals on social media sites which includes offensive, obscene, bullying, discriminatory, hateful, racist, sexist, abusive, harassing, threatening or defamatory content.

Social media activity is covered by other Company policies including the Company's Violence, Bullying and Harassment Policy and the Code of Conduct, and Personnel should refer to those policies for further details on the standard of behaviour expected by the Company.

Where any Personnel post inappropriate material on social media, the Company reserves the right to request it be removed. Personnel are expected to comply with such reasonable requests or disciplinary action may be taken.

Personnel are not to identify any other Personnel or publish personal details or images about them on social media without their permission.

Reputation of the Company and online opinions

Subject to the requirements of this Policy, Personnel, as private citizens, may engage in public debate on political or social issues, whether on the radio, the internet, in newspapers, on the television or social media sites. However, in such circumstances Personnel must not:

(a) make comments as a representative of the Company unless authorised to do so (and where applicable, in compliance with the Company's Continuous Disclosure Policy);

(b) identify themselves as a director, officer, employee, contractor or consultant of the Company unless authorised to do so (and where applicable, in compliance with the Company's Continuous Disclosure Policy); or

(c) make comment, regardless of the connection with the person's duties, that amounts to criticism sufficiently strong or persistent to give rise to a public perception that the person is not prepared to implement or administer the policies of the Company as they relate to their duties.

Personnel who are Directors, Officers or who have an senior official public role for the Company should not engage in public debate as a private citizen on political and/or social issues, whether on the radio, the internet, in newspapers, on the television or social media sites, if their views are contrary to the official position of the Company or may be interpreted as being negative about the Company, its employees, projects or its industry.

The Company's social media accounts

Access to the Company's social media accounts and website is limited to the CEO, Company Secretary, Chief Commercial Officer, VP Corporate Development, investor relations staff and the head of social media and those that have been authorised by the CEO or Company Secretary (together, **Authorised Users**). Other Personnel are not permitted to use the Company's social media accounts or publish any information on social media under the Company's name or banner without authorisation.

Authorised Users must ensure that:

(a) Password strength is set at a strong level, consisting of at least eight characters including at least one number, one symbol and one capital letter.

(b) Where possible, two-factor authentication measures are used for accessing the Company's social media accounts and website.

(c) The Company Secretary Chief Commercial Officer, VP Corporate Development, investor relations staff and the and the head of social media have the contact details for the website host and have access details (including passwords) for all social media and websites and can immediately edit or remove any post or content if required.

(d) If any social media account is compromised, immediate action is taken to change the passwords on all social media accounts. New passwords must be provided to the Company Secretary and head of social media upon creation.

(e) Should unauthorised access or control of the Company's website occur, the Company Secretary or other Personnel responsible for the website must immediately contact the host of the website to resolve the issue as soon as practicable.

Authorised Users are permitted to make social media posts regarding material information once an announcement has been released on ASX and AIM.

All Personnel must comply with this Policy, including with regards to confidentiality and proper conduct, when interacting with the Company's social media accounts.

A non-exhaustive list of social media posts permitted for Authorised Users is provided in Schedule 3. Also included in Schedule 3 are social media posts which require explicit approval by the Company Secretary prior to being posted. In the case the Company Secretary is not available, then a Director of the Company my provide their approval.

Schedule 1 – Key Concepts used in the Social Media Policy

What is social media?

The Policy uses the term "social media" to cover all forms of current and emerging social platforms and technologies, including but not limited to:

1. the internet and Company website;
2. social networking platforms such as Facebook;
3. professional networking services such as LinkedIn;
4. financial or stock exchange forums such as HotCopper;
5. video and photo sharing websites such as Instagram and YouTube;
6. micro-blogging or communication tools such as X (formerlyTwitter);
7. forums and discussion boards;
8. online collaborations such as Wikipedia;
9. podcasts; and
10. blogs including corporate blogs, personal blogs and blogs hosted by traditional media outlets.

The above list is not exhaustive, and the Policy will apply to similar platforms and technologies developed after the date of this Policy.

What actions with respect to social media are covered by the policy?

The Policy applies to all actions made with respect to social media including but not limited to:

1. posting content, including but not limited to, text, tweets, audio, video, photos, maps, technical figures and diagrams;
2. sharing, reposting, retweeting or commenting on other posts;
3. likes, dislikes, upvotes, downvotes and use of emoticons or reactions;
4. forwarding content; and
5. following or unfollowing individuals, organisations or other pages.

The Policy applies whether or not the action was taken during work hours and whether or not from a Company device.

What is "material information" in the context of confidentiality and continuous disclosure?

For the purposes of the ASX Listing Rules, the Company must disclose to ASX any information concerning it that a reasonable person would expect to have a material effect on the price or value of the Company's securities ("**material information**"). Pursuant to the *Corporations Act 2001* (Cth), information has a material effect on the price or value of securities if it may influence persons who commonly acquire securities in deciding whether or not to acquire or dispose of the securities.

If Personnel are unsure whether information regarding the Company is material information, they must refrain from disclosing that information on social media (or otherwise) and should consult the Company Secretary as to the appropriate course of action.

Schedule 2 – Social Media Guidelines

These guidelines aim to assist Personnel in determining appropriate conduct when using social media and to identify risks and traps that may arise with social media use. These guidelines are not intended to cover every situation or identify all risks, and Personnel must exercise their judgement or discuss matters with the Company Secretary if unsure.

Privacy and security

1. Check account and privacy settings to ensure you know who can view your posts on social media platforms.
2. Be aware that even private posts may be screenshotted, forwarded or become public.
3. Be aware that what is published may be public for a long time and full deletion may not be possible as even deleted information may be stored on platform back-ups and search engines such as Google.
4. Choose strong and unique passwords for your social media accounts and ensure they are different to the password used to access your Company account.
5. Use your Company email address to register for a site where you are representing the Company in a professional capacity but use your personal email address for other sites.

Damage to reputation

6. Be aware that representing the Company or your co-workers in a negative light, or making disparaging remarks, could be damaging to the Company's brand and reputation or may breach the Violence, Bullying and Harassment Policy. Such behaviour may also be damaging to your reputation.
7. Do not state or imply that the Company endorses your personal views unless expressly authorised to do so.
8. Avoid unnecessary or unproductive arguments on social media relating to the Company or its Personnel and react calmly to any criticism. Before responding to negative comments on social media it is a good idea to take time to reconsider the content before posting and, where appropriate, seek proper authorisation.
9. Disagreements or differences of opinion may be unavoidable however communications should always be kept respectful.
10. Do not react offensively when facing a negative reaction to what has been posted, or where misrepresentations are made about the Company through third party social media. Unnecessary or unproductive controversy may result in negative consequences for the Company and its Personnel.
11. The Company's social media sites should only follow, contain links to, comment on or like (or dislike) appropriate third party websites. These third party should be reviewed regularly for any social and/or commercial content which is not appropriate for the Company to be associated with.

Third party comments, publications & posts

12. ASX and other regulatory bodies generally view any form of endorsement, share, repost, comment, like or links to information as a publication by the Company.
13. As a result, broker and analyst reports which contain forecasts for production, profits or share prices must not be referred to in any social media posts or Company websites. This also includes third parties engaged for the purpose of assisting or advising on investor / public relations and social media.
14. If the Company pays for a broker or analyst report (as is required in UK and Europe), then the report can be published by the third party in accordance with the relevant legislative requirements, however as stated above, the Company cannot endorse, share, repost, comment, like or provide website links to the report.

Confidentiality and intellectual property

15. Do not disclose the Company's confidential information including information such as business performance, business strategy and financial information, or legal matters such as litigation or disputes. Only disclose and discuss publicly available information in compliance with the Policy.

16. Do not infringe any third-party intellectual property rights. For example, do not post images that are not yours as if they are your own.

17. Do not share or publish photos or personal information about your co-workers on social media unless you have their express permission.

18. Be aware that confidentiality restrictions may continue to apply beyond your period of engagement with the Company.

19. Immediately notify the Company Secretary if you come across negative or inaccurate posts about the Company or posts that breach confidentiality obligations, when browsing social media sites.

Schedule 3 – Examples of Permitted Social Media Posts for Authorised Users

Below is a list of non-exhaustive examples where an Authorised User may make social media posts without approval:

1. **Information regarding material announcements**, but only after the announcement has first been published on ASX andAIM
2. **Sharing links to Company presentations** once they have been publicly released on all required exchanges
3. **Corporate event participation**, such as conferences, investor days, or panel appearances, where no undisclosed material information is revealed
4. **Reposting industry or sector expert analysis, reports or commentary** (e.g. commodity price forecast or general commodity research)
5. **On-site activities or broker roadshows and investor days**, provided no photos or videos of drill core are posted unless assay results have first been released on the ASX.
6. **Environmental, social or community engagement activities**, provided they do not reference undisclosed results
7. **Reposting mainstream media articles** that reference the Company, provided the content does not include or imply undisclosed material information
8. **Sustainability initiatives**, including ESG programs, environmental clean-ups, renewable energy efforts, or charity collaborations
9. **Recruitment posts**, including job advertisements or hiring announcements
10. **Company participation in industry associations**, memberships, working groups, or standards initiatives
11. **Corporate branding content**, such as refreshed company imagery, tagline updates, or brand-related campaigns
12. **Employee or team recognition posts**, such as highlighting staff achievements, training programs, or safety milestones (without disclosure of operational data)
13. **Financial calendar reminders**, such as notification of upcoming AGM dates, reporting deadlines, or webcast schedules (only after officially announced)
14. **General corporate updates**, such as changes to website content, publication of newsletters, or release of non-material corporate videos

The below are examples where an Authorised User must seek either the Company Secretary's explicit approval prior to making any social media post (or if the Company Secretary is absent, approval from a Company Director):

1. **Video or audio interviews** conducted by a Company spokesman (e.g. CEO, MD, Chair, CCO or investor relations)
2. **Podcasts** conducted by a Company spokesman (e.g. CEO, MD, Chair, CCO or investor relations)
3. **Community or stakeholder visits**, including meetings with local authorities, NGOs, or community groups