

SOCIAL MEDIA POLICY

This Social Media Policy establishes guidelines for the correct use of social networking sites by employees, directors and officers of Gateway Mining Limited (**Company**).

Social networking sites such as Facebook, Instagram, LinkedIn, Tik Tok and Twitter are increasing in popularity and application in both professional and personal arenas.

As with all of the Company's policies, the key matter in relation to the use of social media both in the workplace and out of hours to make comment about the Company and its employees, clients, customers, suppliers etc, is appropriate and acceptable professional behaviour irrespective of the medium of communication.

Employees are required to "communicate" on any social networking site with the same level of professionalism they would demonstrate in a board room meeting, phone call or email.

Employees should be aware that the Company has a right to monitor usage of its internet and phone resources and consequently, usage of social networking sites from Company resources may be monitored.

IMPORTANT NOTE FOR EMPLOYEES

Employees should be aware that the employee's opinion when expressed on a social network site could have a detrimental effect on the profitability or reputation of the Company. If it is found that such commentary has or is likely to have an adverse impact on the business or its associates, disciplinary action will be taken, including termination for serious breaches of this policy.

Employees must also communicate on social networking sites in a lawful manner or risk breaching various laws relating to harassment, equal opportunity and privacy.

Any communication on social networking sites must be conducted in line with the responsibilities in the following policies:

- Code of Conduct
- Email, Internet & Telecommunications Policy;
- Shareholder Communications Policy;
- Continuous Disclosure Policy; and
- any other of the Company's charters and policies.

Company's policy on the use of social networking sites while at work is as follows:

Usage

Employees are to limit access to social networking sites using Company or personal resources during working hours. Should the aforementioned limited access lead to a distraction of an employee's work then the employee's manager or management of the Company may determine that no access to social networking sites using Company or personal resources during working hours should be conducted and that any access shall be restricted to rest break periods only away from their desks.

When using social media in relation to the Company, Employees are expected to:

- seek prior authorisation from the Company Secretary;
- adhere to Company policies and procedures;
- behave with caution, courtesy, honesty and respect;
- comply with relevant laws and regulations;

- only disclose information that has already been released to the market; and
- reinforce the integrity, reputation and values the Company seeks to foster.

Content

Employees who access social networking sites whether by Company or personal resources must not post comments or images relating to the Company's clients, customers, colleagues, contractors, work functions, Principals or Managers and the like without express written permission to do so.

The following content is not permitted under any circumstances:

- content that has not been released to the market;
- abusive, profane or language of a sexual nature;
- content not relating to the subject matter of that blog, board, forum or site;
- content which is false or misleading;
- confidential information about the Company or third parties;
- copyright or trade mark protected materials;
- 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;
- illegal material or materials designed to encourage law breaking;
- materials that could compromise the safety of any employee;
- materials which would breach applicable laws (Corporations Act and regulations, ASX Listing and Operating Rules, defamation, privacy, consumer and competition law, fair use, copyright, trade marks);
- material that would offend contemporary standards of taste and decency;
- material which would bring the Company into disrepute;
- personal details of Company directors, employees or third parties;
- spam, meaning the distribution of unsolicited bulk electronic messages; and
- statements which may be considered to be bullying or harassment.

Any employee failing to adhere to this requirement will be managed in accordance with the Company's disciplinary procedures which may include dismissal for serious breaches. Other disciplinary action that may be taken includes, but is not limited to, issuing a formal warning, directing an employee to attend mandatory training, suspension from the workplace and/or permanently or temporarily denying access to all or part of the Company's computer network.

The employee is reminded that they are bound contractually to act in good faith and have a duty of fidelity to the employer not to harm the business or damage the reputation of the Company and the people associated with it.

Confidential Information

Employees by common law have duties to the Company to not knowingly misuse, or wrongfully disclose the Company's confidential information during employment. Employees may also have appropriate restraints in their employment contract to protect the business if the employee was to leave the Company's employment for any reason. Any breach of these post-employment restrictions may result in legal action. Employees should refer to their employment contract for clauses relating to confidential information and/or restraints and ensure they abide by these clauses.

Blogs

There are some legal implications when it comes to blogging, if you are not careful, you may get yourself into trouble from a legal perspective. There are some bloggers that will write about anything and everything. You should only write on something that you have evidence to prove, or back up your claims.

All companies are ready to protect their sources of profits; therefore, you should be very careful disclosing trade secrets by posting anything that may be considered as a trade secret.

Stealing content is a very serious offence when it comes to blog posting, this is also known as plagiarism. You should be very careful when it comes to copyrighted content. Make sure that information you write is original, and if not, make sure that you provide a link that will acknowledge the original author.

The key is to remember that all the laws, policies and social rules that apply in real life also apply on the internet.

Compliance

Employees are expected to demonstrate standards of conduct and behaviour that are consistent with relevant legislation, regulations and policies, including the following non-exhaustive list:

- Corporations Act 2001 (Cth);
- ASX Listing and Operating Rules;
- the Company's employment contracts; and
- the Company's Trading Policy.

Under the ASX Listing Rules, the Company is obliged to ensure that all inside information must be disclosed first via ASX Online before it is disclosed elsewhere due to the Company's policy is that no Employee will comment on the Company or its activities or potential activities via social media without:

- having cleared the text of the social media comment with the Board or the Managing Director or Chief Executive Officer (as applicable) prior to release; and
- ensuring that no comment breaches the ASX Listing Rules.

Intellectual Property

Employees, with written permission from the Board, will use the Company's own intellectual property where possible and shall obtain prior consent where the Company is not the creator or copyright owner, to use or reproduce copyright material including applications, sound recordings (speeches, music), footage (cinematographic vision), graphics (graphs, charts, logos, clip-art), images, artwork, photographs, publications or musical notation.