



Social Media Policy

Great Dirt Resources Ltd
(ACN 670 840 301)

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Table of Contents

1. Background	3
2. Social Media Definition	3
3. Scope of Policy	3
4. Legislative & Policy Framework	4
5. Policy Requirements	4
6. Prior Authorisation	5
7. Media Statements	6
8. Expertise	6
9. Confidential Information	6
10. Accuracy	6
11. Identity	6
12. Personal Opinions	6
13. Privacy	7
14. Intellectual Property	7
15. Content of Social Media Statements	7
16. Personal Privacy	7
17. Modification and Moderation	8
18. Responsiveness	8
19. Monitoring	8
20. General Responsibilities	8
21. Enforcement	8
22. Corporations Act	9
23. Review and Publication	9
24. Associated Documents	9

1. Background

Great Dirt Resources Ltd (**Company**) has the following Social Media Policy (**Policy**) to regulate the use of social media by people associated with the Company or its subsidiaries. The Policy covers the use of electronic media for engagement within and between the Company and the market by directors and employees, the Company's contractors (including subcontractors) and employees of the Company's contractors, joint venture partners (who have agreed to be bound by the Policy) and suppliers (**Restricted Persons**).

To preserve the reputation and integrity of the Company, this Policy will apply to the wide range of technologies commonly referred to as 'social media' which fundamentally are no different to other forms of communication but do represent a risk as well as an opportunity because they can connect large numbers of people with relative ease. The rationale for the Policy is to manage the risks associated with the use of technology platforms and tools of this nature.

2. Social Media Definition

Social media means online social networking services and other online platforms, services and tools used for publishing, sharing and discussing information, including without limitation blogs or web logs, electronic forums or message boards, micro-blogs, photo sharing sites, social bookmarking sites, social networking websites, messaging applications, video sharing sites, virtual platforms, wikis and any other electronic media that allow individual users to upload and share content regardless of format.

3. Scope of Policy

The Policy outlines requirements for compliance with confidentiality, governance, legal, privacy and regulatory parameters when using social media to conduct Company business.

This Policy is intended to apply to both the Company and its subsidiaries. References to the Company in this Policy should be read as referring to both the Company and its subsidiaries, as appropriate.

This Policy aims to:

- (a) inform appropriate use of social media tools for the Company;
- (b) promote useful market engagement through the use of social media;
- (c) minimise problematic communications; and
- (d) manage the inherent challenges of speed and immediacy.

This Policy should be read in conjunction with other relevant policies and procedures of the Company and is not intended to cover personal use of social media where the author publishes information in their personal capacity and not on behalf of, or in association with the Company and no reference is made to the Company, its directors, employees, policies and products, suppliers, shareholders, other stakeholders or Company related issues.

4. Legislative & Policy Framework

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

- (a) *Corporations Act 2001* (Cth) (**Corporations Act**);
- (b) ASX Listing and Operating Rules;
- (c) the Company's employment, consultancy, contractor, supplier and other applicable agreements;
- (d) the Company's Continuous Disclosure Policy; and
- (e) the Company's Securities Trading Policy.

5. Policy Requirements

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

- (a) seek prior authorisation from the Company Secretary or Executive Director;
- (b) adhere to Company policies and procedures;
- (c) behave with caution, courtesy, honesty and respect;
- (d) comply with relevant laws and regulations;
- (e) only disclose information that has already been released to the market through ASX and must not disclose or comment on market-sensitive information unless it has been authorised and released in accordance with the Company's Continuous Disclosure Policy; and
- (f) reinforce the integrity, reputation and values the Company seeks to foster.

Restricted Persons may enter into a separate standing arrangement with the Company to enable the Restricted Person to use social media in certain circumstances without obtaining consent on every occasion from the Company Secretary or Executive Director.

Such a standing arrangement could include, for example, the posting of announcements that the Company has released to the market through ASX.

The following content is not permitted under any circumstances:

- (a) content that has not been released to the market through ASX or otherwise authorised for disclosure by the Company Secretary or Executive Director;
- (b) abusive or profane content or language, including of a sexual nature;
- (c) content not relating to the subject matter of that blog, board, forum or site;
- (d) content which is false or misleading;
- (e) confidential information of or about the Company or third parties;
- (f) copyright or trademark protected materials;
- (g) 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;
- (h) illegal material or materials designed to encourage law breaking;
- (i) materials that could compromise the safety of any employee;
- (j) materials which would breach applicable laws (Corporations Act and regulations, ASX Listing and Operating Rules, defamation, privacy, consumer and competition law, fair use, copyright, trademarks);
- (k) material that would offend contemporary standards of taste and decency;
- (l) material which would bring the Company into disrepute;
- (m) personal details of Company directors, employees or third parties;
- (n) spam, meaning the distribution of unsolicited bulk electronic messages; and
- (o) statements which may be considered to be bullying or harassment.

If you have any doubt about applying the provisions of this Policy, contact the Company Secretary prior to using social media to communicate on behalf of the Company. Depending upon the nature of the issue and potential risk, it may also be appropriate to consider seeking legal advice prior to publication.

6. Prior Authorisation

Authorisation from the Company Secretary or Executive Director must be obtained before a Restricted Person can use social media in relation to the Company, including but not

limited to uploading content, publishing Company-related information or speaking on behalf of the Company.

7. Media Statements

Statements or announcements cannot be made through social media channels unless authorised by the Company Secretary or Executive Director. No Restricted Person may respond directly if approached by media for comment through social media and must refer the inquiry to the Company Secretary or Executive Director.

8. Expertise

No Restricted Person may comment outside their area of expertise.

9. Confidential Information

Restricted Persons may only discuss publicly available information. Restricted Persons must not disclose confidential information, market-sensitive information, internal discussions or decisions of the Board, employees, consultants or other third parties.

10. Accuracy

Information published should be accurate, constructive, helpful and informative. Restricted Persons must not publish information or make statements which are known to be false or may reasonably be taken to be misleading or deceptive. Any actual or suspected error in Company-related social media content must be promptly escalated to the Company Secretary or Executive Director so that corrective action can be considered and taken as soon as practicable.

11. Identity

Restricted Persons must be clear about their professional identity, or any vested interests and must not use fictitious names or identities that deliberately intend to deceive, mislead or lie or participate in social media anonymously or covertly or via a third party or agency.

12. Personal Opinions

Restricted Persons should not express or publish a personal opinion on the Company generally or about Company business via social media and should be mindful of market disclosure rules when discussing or commenting on Company matters. Personal posts

must not suggest or imply endorsement by the Company, disclose Company information or comment on Company decisions or business unless authorised by the Company Secretary or Executive Director. If it is not possible to separate official Company positions from personal opinions, Restricted Persons should consider using a formal disclaimer to separate interests.

13. Privacy

Restricted Persons should be sensitive to the privacy of others and must take reasonable care before sharing photographs, video or other footage that identifies or depicts individuals. Appropriate consent or approval should be obtained where required by law, Company policy or the circumstances, even where the Company owns or controls the relevant image or footage.

14. Intellectual Property

Restricted Persons, with written permission from the Company Secretary or Executive Director, 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, footage, graphics, images, artwork, photographs, publications or other protected material. Restricted Persons will also typically seek permission before publishing or uploading the intellectual property of a third party or before linking to another site or social media application.

15. Content of Social Media Statements

- (a) Restricted Persons will not comment, contribute, create, forward, post, upload or share content that is scurrilous, malicious or defamatory. Restricted Persons will endeavour to be courteous, patient and respectful of the opinions of others, including detractors and the discourteous.
- (b) Restricted Persons will be conscious of anti-discrimination laws and must not publish statements or information which may be discriminatory in a human rights sense.
- (c) Restricted Persons will remain mindful of language and expression and not lapse into excessive use of colloquialisms, having regard to an international audience.
- (d) Restricted Persons must not use social media when irritated, upset or tired.

16. Personal Privacy

Restricted Persons should protect their personal privacy and guard against identity theft.

17. Modification and Moderation

Restricted Persons should ensure that any social media sites created or contributed to can be readily edited, improved or removed and appropriately moderated.

18. Responsiveness

The Company will endeavour to specify the type of comments and feedback that will receive a response and clearly communicate any target response time. Restricted Persons should make it easy for audiences to reach the Company and/or its subsidiaries by using approved Company contact details and official social media channels only.

19. Monitoring

The Company reserves the right, for legal compliance purposes, to monitor social media usage on its systems without advance notice and in accordance with applicable laws. The Company may be legally required to produce logs, diaries and archives of social media use to judicial, law enforcement and regulatory agencies and will comply with any relevant requests. Restricted Persons and other users should govern themselves accordingly.

20. General Responsibilities

Restricted Persons should seek advice or authorisation from the Company Secretary or Executive Director before using social media in relation to the Company. Restricted Persons should understand and comply with this Policy, any relevant End User Licence Agreements and any applicable Company procedures, and should maintain appropriate records, including email addresses, comments, followers and printed copies or electronic screen grabs when using externally hosted sites, where practicable and in accordance with the Company's record-keeping requirements. Each Restricted Person is responsible for adhering to the Company's Social Media Policy.

21. Enforcement

All content published or communicated by or on behalf of the Company using social media must be recorded, where practicable, including the author's name, date, time and media site location, and kept in accordance with the Company's record-keeping requirements. The Company will actively monitor social media for relevant contributions that impact on the Company or its subsidiaries, and their officers, operations or reputation.

A breach of this Policy may result in disciplinary action, performance management, suspension or termination of employment or engagement, or other contractual or remedial action, as appropriate. The Company reserves the right to remove, where possible, content that violates this Policy or any associated policies.

22. Corporations Act

The requirements imposed by this Policy are separate from, and additional to, the legal prohibitions in the Corporations Act. Directors, officers, consultants, employees and other Restricted Persons should be aware that they may be subject to civil or criminal liability under laws relating to market manipulation, false trading, market rigging, insider trading and misleading or deceptive conduct, all of which apply at law regardless of this Policy.

23. Review and Publication

This Policy will be published on the Company's website and in the appropriate Policy Manuals for the Company. This Policy will be reviewed from time to time and updated as required to ensure it remains current having regard to legal, regulatory and business developments.

24. Associated Documents

Continuous Disclosure Policy

Shareholder Communications Policy

Code of Conduct

Securities Trading Policy