

Adopted 11 October 2021

Thor Mining Plc: Social Media Policy

1. Policy statement

This policy is intended to help staff make appropriate decisions about the use of social media – which encompasses the main networking sites such as Facebook, Twitter and LinkedIn, but also includes blogs, wikis, podcasts, forums and message boards.

This policy, which will be reviewed annually on behalf of the board of directors, outlines the standards we require all staff to observe when using social media on behalf of Thor Mining Plc or related entities (the “Company” or “Thor”), the circumstances in which we will monitor your use of Thor’s social media profiles and the action we will take in respect of breaches of this policy.

2. Who is covered by the policy

This policy covers all individuals working at all levels of the business, including senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term employees, casual and agency staff and volunteers (collectively referred to as “staff” in this policy).

Any third parties engaged in relation to the use of social media are also required to comply with this policy

3. The scope of the policy

All staff are expected to comply with this policy at all times to protect the privacy, confidentiality, and interests of Thor and our services, employees, partners, customers, and competitors and to ensure Thor complies with applicable regulations and law, including Market Abuse Regulation (MAR) and the AIM Rules.

There are two main kinds of social media activity we are concerned with:

1. Official social media activity in the name of Thor, usage in accordance with this policy.
2. Your own personal social media use, not carried out in the name of Thor. An absolute prohibition to discuss Thor, financial instruments and regulated activities.

4. Responsibility for implementation of the policy

The Managing Director (the “MD”) has overall responsibility for the effective operation of this policy.

The MD is responsible for monitoring and reviewing the operation of this policy and making recommendations for changes to minimise risks to our operations.

All staff are responsible for their own compliance with this policy and for ensuring that it is consistently applied. All staff should ensure that they take the time to read and understand it. Any breach of this policy should be reported to the MD.

Questions regarding the content or application of this policy should be directed to the MD.

5. Our regulatory requirements

AIM has strict requirements regarding the use of social media.

AIM Rule 10 states that any information required to be published by the AIM Rules, including unpublished price sensitive information, must be published on our Regulatory Information Service (RIS) no later than it is published elsewhere. It is the responsibility of all Thor's social media users to ensure that information which is required to be released via the Regulatory Information Service (RIS) is not published on our social media accounts in advance of this happening. For more information, Inside AIM "Interaction of social media with disclosure obligations under the AIM Rules", which was published on 10 December 2016, is available to read at the following link:

<http://www.londonstockexchange.com/companies-and-advisors/aim/advisers/inside-aim-newsletter/inside-aim-newsletter.htm>

There are equivalent rules to that noted above, in the ASX Listing Rules. In addition, the ASX Listing Rules require compliance with the JORC Code.

If we are ever uncertain as to the application of the AIM Rules or ASX Listing Rules, we are required to consult our NOMAD and Company Secretary about how information is disseminated and ensure that our communications are supervised and monitored to ensure compliance with the AIM Rules and ASX Listing Rules disclosure obligations. No information will be provided to media even on an embargoed basis ahead of the release of RNS updates. Under no circumstances will social media updates be made prior to RNS updates or ASX releases. In the case of any doubt, we should check with the NOMAD prior to publishing any social media post.

If you are in any doubt whatsoever, do not use social media without consulting the MD.

6. Monitoring

Social Media Users (SMUs) monitor Thor profiles on a regular basis, first thing in the morning and during the working day. If anyone has mentioned Thor in a social media post, these can be seen by SMUs by clicking 'notifications' on Twitter or LinkedIn. In addition to checking notifications, 'direct messages' on Twitter must also be checked at least once a day and dealt with accordingly. Responding to these mentions and messages is dealt with below.

The MD will be accountable and responsible for overseeing the content published by SMUs on our social media platforms.

If (i) our share price is up or down 10% or more, (ii) volumes and number of trades are significantly higher than usual or (iii) when in possession of unpublished price sensitive information, the MD will on a daily basis review the investor chat rooms to monitor for online discussions.

7. Use of Social Media by Thor

Social Media should only be used by Thor to disseminate information in the following ways:

- To communicate links to already published Corporate results and announcements – linking to the Thor's website and always include link to the announcements on ASX or AIM as appropriate

- To share externally written articles or comments about Thor including but not exclusively those relating to new staff joiners or promotions, award wins, corporate or staff charity support, local marketing events or Thor sponsorship.
- To promote career opportunities
- To reproduce appropriate announcements already released via a Regulatory Information Service

Group social media accounts can only be updated with approval of the MD.

8. Rules for use of personal social media profiles

When using your own use social media profiles and presence you must adhere to the following general rules:

When making use of any social media platform, read and comply with its terms of use.

Always write in the first person, identify who you are and what your role is, and use the following disclaimer “The views expressed are my own and don’t reflect the views of my employer”.

What you say in relation to Thor reflects directly on Thor. Discuss with the MD the circumstances in which you can respond directly to third parties, or those situations where you need to seek approval before posting.

Do not upload, post, forward or share a link to any abusive, obscene, discriminatory, harassing, derogatory, illegal or defamatory content.

Any member of staff who feels that they have been harassed, offended, insulted or bullied by comments on a Thor social media platform, should inform their line manager or the MD.

Never disclose commercially sensitive, anti-competitive, private or confidential information. If you are unsure whether the information you wish to share falls within one of these categories, you should discuss this with the MD. If in doubt, do not disclose.

The sharing/retweeting of content posted by a third party is common practice within social media. However, if you aren’t sure about whether something is appropriate to share, or if you feel that it would be prudent to check with that third party before sharing the content, then seek advice from the MD.

It is acceptable to quote a small excerpt from an article, particularly for the purposes of commenting on it. However, if you think an excerpt is too big, it probably is. Quote accurately, include references and when in doubt, link, don't copy.

Before your first contribution on any social media site, observe the activity on the site for a while before launching in yourself to get a feel for the style of contributions and the nature of the content.

Do not post, upload, forward or share a link to chain mail, junk mail, cartoons, jokes or gossip.

Be honest and open, but be mindful of the impact your contribution might make to people’s perceptions of us as a company. If you make a mistake in a contribution, be prompt in admitting and correcting it.

You are personally responsible for content you publish into social media platforms – be aware that what you publish will be public for many years.

Don't escalate heated discussions, try to be conciliatory, respectful and quote facts to lower the temperature and correct misrepresentations. Never contribute to a discussion if you are angry or upset, return to it later when you can contribute in a calm and rational manner.

If you feel even slightly uneasy about something you are about to publish, then you shouldn't do it. If in doubt, always discuss it with the MD first.

Always consider others' privacy and avoid discussing topics that may be inflammatory e.g. politics and religion. Do not discuss situations involving named or pictured individuals without their prior permission.

Avoid publishing your contact details where they can be accessed and used widely by people you did not intend to see them, and never publish anyone else's contact details.

If you see content/mentions about Thor on social media, either complimentary or critical, which you feel needs a response, but which you don't feel confident in replying to, please advise the MD and request guidance.

As a guideline, do not post anything on a social media platform that you would not present in ANY public forum.

9. Monitoring use of social media websites

Staff should be aware that any use of social media websites (whether or not accessed for work purposes) may be monitored and, where breaches of this policy are found, action may be taken.

We reserve the right to restrict or prevent access to certain social media websites if we consider personal use to be excessive. Monitoring is only carried out to the extent permitted or as required by law and as necessary and justifiable for business purposes.

Misuse of social media websites can, in certain circumstances, constitute a criminal offence or otherwise give rise to legal liability against you and us. It may also cause embarrassment to us and to our clients.

In particular uploading, forwarding a post or sharing a link to any of the following types of material on a social media platform, in a professional capacity, will amount to gross misconduct (this list is not exhaustive):

- pornographic material (that is, writing, pictures, films and video clips of a sexually explicit or arousing nature);
- a false and defamatory statement about any person or organisation;
- material which is offensive, obscene, criminal, discriminatory, derogatory or may cause embarrassment to us, our clients or our staff;
- confidential information about us or any of our staff or clients (which you do not have express authority to disseminate); Material non-public information or Inside information as defined by FSMA 2000 or AIM Rules;
- any other statement which is likely to create any liability (whether criminal or civil, and whether for you or us); or
- material in breach of copyright or other intellectual property rights, or which invades the privacy of any person.

Any such action is likely to result in summary dismissal.

Where evidence of misuse is found we may undertake a more detailed investigation in accordance with our Disciplinary Procedure Policy, involving the examination and disclosure of monitoring records to those nominated to undertake the investigation and any witnesses or managers involved in the investigation. If necessary such information may be handed to the police in connection with a criminal investigation.

If you notice any use of social media by other members of staff in breach of this policy please report it to the MD.

10. Sharing or commenting on Thor content as yourself

There may be occasions when you wish to share Thor social media content on your personal profiles, or use your personal profile to link direct to information on the Thor website or existing third party website links that refer to Thor. In these circumstances, please adhere to the rules of this policy. In online social networks, the lines between public and private, personal and professional are blurred. If you should identify yourself as a Thor employee, you are creating perceptions about your expertise and about Thor by our shareholders, customers, and the general public - and perceptions about you by your colleagues and managers. Be sure that all content associated with you is consistent with your work and with Thor's values and professional standards.

11. Monitoring and review of this policy

The MD shall be responsible for reviewing this policy annually to ensure that it meets legal requirements and reflects best practice.