

## Social Media Policy

### 1. Purpose

This policy is in place to minimise the risks the Company through use of social media and to set out the standards of behaviour expected of employees, vendors, officers, consultants, volunteers, interns, casual workers, agency workers and contractors in their activities on social media sites.

This policy deals with the use of all forms of social media which for the purposes of this policy includes but is not limited to Facebook, LinkedIn, X, Google+, Wikipedia, Whisper, Instagram, Tumblr, TikTok, Steam and all other social networking sites, internet postings, the Company's website, non-regulatory news feeds, blogs and forums. It applies to use of social media for business purposes as well as personal use that may affect the Company in any way.

This policy covers all individuals working for the Company at all levels and grades including all employees, directors, officers, consultants, contractors, interns, casual workers, vendors and agency workers of the Company.

A breach of this policy may be dealt with under our disciplinary procedure, in serious cases may be treated as gross misconduct leading to summary dismissal or termination of contract (if applicable).

This policy is for guidance only and does not form part of any employee's contract of employment and may be amended at any time. 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. It is vital for every employee to read this policy carefully. If there is anything an employee does not understand, it is their responsibility to ask their manager to explain.

### 2. Activity on Social Media Sites During Working Hours

Occasional personal use of social media during working hours is permitted so long as it does not involve unprofessional or inappropriate content and provided that this does not interfere with employment responsibilities or productivity and complies with this policy. Breaching these restrictions will place an employee at risk of disciplinary action.

### 3. Personnel Responsible for Implementing the Policy

The Board has overall responsibility for the effective operation of this policy but has delegated day-to-day responsibility for its operation to Jason Brewer, Chief Executive Officer.

Responsibility for monitoring and reviewing the operation of this policy and making recommendations for change to minimise risks lies with the CEO and Chair who will review this policy at least annually to ensure that it meets legal requirements and reflects best practice. We may amend this policy from time to time to achieve these objectives.

All 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.

All staff are responsible for the success of this policy and should ensure that they take the time to understand it. Any misuse of social media or questions about this policy should be reported to the CEO and or the Chair.

If AQSE considers that the Company has breached the AQSE Rules for Companies (the "AQSE Rules"), it will investigate and take such disciplinary action as it considers appropriate in accordance with this policy.

The Board may be required to issue a clarification notification where comments made via social media by directors, or persons on behalf of the Company are inconsistent with notifications made via a Regulatory Information Service ("RIS") announcement.

If the Board or CEO are unsure regarding any posts they wish to publish, via non-regulatory news feeds, on the Company's website or via any other form of social media, the Company will take advice from its legal advisers and corporate advisers before approving any such public communication.

#### **4. Compliance with Related Policies and Agreements**

Social media should never be used in a way that breaches any of the Company's other policies, including but not limited to the Disclosure Policy and Share Dealing Code. 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:

- breach the Company's or your obligations with respect to the rules of relevant regulatory bodies, in particular the AQSE Rules and/or the Market Abuse Regulation (Regulation 596/2014/EU) (as amended by the Market Abuse (Amendment) (EU Exit) Regulations 2019 (SI 2019/310), the Criminal Justice Act 1993 and Financial Services and Markets Act 2000 (Amendment) (EU Exit) Regulations 2019 (SI 2019/632)) and as applicable in the UK by way of the European Union (Withdrawal) Act 2018 (as amended) ("MAR"), further details of which are set out at paragraph 5 below;
- breach any obligations contained in those policies relating to confidentiality;
- harass or bully other staff in any way;
- unlawfully discriminate against other staff or third parties;
- breach the Company's data protection policy; or
- breach any other laws or regulatory requirements.

The same principles and guidelines that apply to the Company's activities in general apply to all online activities. This includes all forms of online publishing and discussion (whether for personal use or on behalf of the Company) including blogs, wikis, user-generated video and audio, virtual worlds and social networks.

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.

Staff who breach any of the above policies will be subject to disciplinary action up to and including termination of employment.

## 5. Prohibited Use

The Company shall implement the necessary processes and procedures which seek to prevent:

- 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 their direct manager;
- members of staff from making any social media communications that could damage the Company's business interests or reputation, even indirectly;
- 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 post discriminatory, offensive, threatening or intimidating language or material whether directed at a colleague, client, customer or any other business contact or otherwise; to make false or misleading statements; or to impersonate colleagues or third parties;
- 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 to obtain such authorisation. Any opinions that are expressed in breach of this policy, without authorisation from the relevant manager, are the employee's own and will not affect the opinions of the Company;
- members of staff from posting comments about sensitive business-related topics (whether in the course of negotiations e.g. potential contract or client wins or otherwise), such as the Company's performance, or do anything to jeopardise or misappropriate the Company's trade secrets, confidential information, express and implied obligations of confidentiality owed to any third party, copyrights and copyright obligations, 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 or breach copyright; and
- members of staff from engaging with the news media or industry analysis to discuss official Company strategy and/or business on the Company's behalf without prior approval of the CEO. To ensure that the Company communicates with the media in a consistent, timely, and professional manner about matters related to the Company, members of staff should consult CEO before responding.

Members of staff should be conscious that they work within a group of companies which is listed on a public market and that, as a result, they may become aware of information which may be "price sensitive", that is, information which, if made public, would be likely to have a significant effect on the price of shares in the Company. This policy prohibits the disclosure of price sensitive information on social media. Disclosure of price sensitive information may also constitute a criminal offence.

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.

Any misuse of social media should be reported to the CEO and Chair.

## **6. Regulatory Requirements**

The AQSE Rules, as published by the Aquis Stock Exchange, provide that a company must make an announcement to the public via an approved RIS without delay of any developments which are not public knowledge and which, if made public, would be likely to lead to a significant movement in the Company's share price. 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.

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 is or may become publicly available is not a substitute for making a notification under the AQSE Rules. Consequently, the requirement to make a notification under the AQSE Rules will not be satisfied by disclosure via social media and the Company must make RIS announcements.

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 Aquis Stock Exchange can investigate and take such disciplinary action as it considers appropriate in such an instance.

It is also an offence under MAR to unlawfully disclose such information, and 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 MAR, falling 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.

## **7. Business Use of Social Media**

If a member of staff's duties requires 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.

Likewise, if staff are contacted for comments about the organisation for publication anywhere, including in any social media outlet, direct the enquiry to the CEO and do not respond without written approval.

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

No third party may be engaged to undertake social media activities on behalf of the Company without the prior approval of the board of directors. Separate parameters and a framework for how third parties will be permitted to post on social media on the Company's behalf must be agreed before the board considers approval for such engagement.

## **8. Personal Social Media Accounts**

Employees are required to comply with the following requirements in respect of their personal social media accounts.

An employee whose role involves use of social media for work purposes should only use social media accounts established for the purposes of the business and must follow the Company's rules on business use of social media which require compliance with this policy.

A personal email address, and not a company email address, should be used for personal social media accounts. A personal social media account should never be used for the purposes of the Company's business.

## **9. Guidelines for Responsible Use of Social Media**

The Company should make members of staff aware that:

- they 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;
- they 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;
- if they disclose their affiliation with the Company on their profile or in any social media postings, they must state that their views do not represent the Company's views (unless they are authorised to speak on the Company's behalf). 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;
- they must refrain from any social media postings which discuss or allude to any information which would or may result in the Company breaching its regulatory or legal requirements, unless that member of staff has been authorised to do so and the Company has already issued an announcement using the RIS;
- if members of staff are uncertain or concerned about the appropriateness of any statement or posting, they 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 CEO or Chair before publication;
- they should remove any posting on a social media site which breaches this policy when required to do so by the Company. A failure to comply with this requirement may in itself result in disciplinary action;
- if they see social media content that disparages or reflects poorly on the Company, they should contact the Company's CEO or Chair; and
- they should co-operate with any investigation into a breach of this policy including the disclosure of relevant usernames, passwords or other login details where requested to do so by the Company.

## **10. Monitoring**

The Company reserves the right to monitor, intercept and review, without further notice, staff activities using its IT resources and communications systems, including but not limited to social media postings and activities, to ensure that its 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.

Employees and Directors will report to the Company, and the Company will maintain, details of those registered with share or financial bulletin boards, including a list of individuals subject to the media and their usernames.

The Company must consult with its nominated adviser if it becomes aware of any significant rumours or problems relating to internet discussions which may impact on its shares and may need to also notify the Aquis Exchange. Any market rumours in relation to the Company should be reported to the CEO, the Chair and COO.

### 11. Recruitment

The Company may use internet searches to perform due diligence on candidates in the course of recruitment. Where this is carried out, it will act in accordance with the Company's data protection and equal opportunities obligations.

### 12. Breach of this Policy


The Company should make staff aware that:

- 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 London Stock Exchange or regulatory body, which may involve handing over relevant passwords and login details; and
- 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.

### 13. Review of Policy

The Board will review this Social Media Policy at least annually, and update as required.

This version of Social Media Policy was reviewed on 31 May 2025.

  
Jason Berger  
31 MAY 2025

