



## SOCIAL MEDIA POLICY

### 1. Purpose and Scope

Marula Mining PLC (the “**Company**”) recognises that social media is a powerful tool for transparency, shareholder engagement and brand building. This policy is designed to enable responsible use of social media while protecting the Company’s reputation and ensuring full compliance with applicable regulatory and legal obligations.

This policy applies to **all directors, officers, employees, contractors, consultants, agency workers and other representatives** of the Company.

It covers all forms of social media and digital communication, including but not limited to **X (Twitter), LinkedIn, Facebook, Instagram, TikTok, Telegram, blogs, forums, investor bulletin boards, and the Company website.**

### 2. Governance and Responsibility

- The **Board of Directors** has ultimate responsibility for the operation and annual review of this policy.
- **Day-to-day oversight** is delegated to the **Chief Executive Officer (CEO)**.
- Only individuals formally authorised by the CEO (the “**Certified Online Spokespeople**”) may speak on behalf of the Company.
- Managers are responsible for ensuring their teams understand and comply with this policy.
- All staff have a duty to report concerns, misuse, or potential breaches immediately to the **CEO or Chair**.

### 3. Regulatory and Legal Compliance

As a public company admitted to the **Aquis Stock Exchange**, the Company is subject to:

- The **AQSE Rulebook**
- The **UK Market Abuse Regulation (MAR)**
- Relevant **FCA rules and guidance**
- The **QCA Corporate Governance Code**
- Other applicable UK laws and regulations

Accordingly:

- **Price-sensitive or inside information** must **never** be disclosed on social media.
- All material information must be released **fairly, accurately and promptly** via an approved **Regulatory Information Service (RIS)**.
- **Selective disclosure**, rumours, hints or commentary that could influence the Company's share price are strictly prohibited.
- Breaches may expose both the Company and individuals to **regulatory sanction, civil liability and criminal penalties**.

#### 4. Core Principles and Standards of Behaviour

The Company's online presence must reflect the same standards expected in all professional conduct:

- **Integrity** – No false, misleading or deceptive communications; no use of fake or anonymous accounts.
- **Accountability** – Individuals are responsible for their digital footprint.
- **Accuracy and Quality** – Communications must be factual, professional and respectful.

Staff must not use social media to:

- Disclose confidential, proprietary or price-sensitive information.
- Harass, bully, threaten or unlawfully discriminate.
- Defame or disparage the Company, colleagues, competitors or third parties.
- Comment on Company performance, strategy, transactions or prospects without authorisation.
- Engage with journalists, analysts or investors on Company matters without CEO approval.
- Provide references or endorsements that could be attributed to the Company.

#### 5. Speaking on Behalf of the Company (Business Use)

Only **Certified Online Spokespeople**, authorised by the CEO, may speak officially on behalf of Marula Mining PLC.

Requirements include:

- **Approval:** All posts relating to Company strategy, performance, negotiations, operations or market matters must be approved by the CEO or Chair.
- **Disclosure:** Individuals must clearly identify their name and role within the Company.
- **Accuracy:** If unsure about the accuracy or sensitivity of information, it must not be posted.
- **Accounts:** All official social media accounts must use Company email addresses and comply with this policy.
- **Third Parties:** External agencies or advisers may only be engaged with Board approval and under a defined governance framework.

## 6. Personal Use of Social Media

The Company respects employees' rights to personal social media use. However, personal activity must not harm the Company or breach regulatory obligations.

Where individuals mention the Company or their role:

- Personal accounts must use **personal email addresses**.
- Company logos, branding or imagery must not be used without permission.
- Staff must not argue, speculate or respond to rumours online. Instead, they should **report ("scout") relevant content** to the CEO or Chair.

Personal use during working hours is permitted only where it does not interfere with duties or breach this policy.

## 7. Confidentiality and Inside Information

Staff must never disclose:

- Inside or price-sensitive information (e.g. assay results, production data, funding discussions, acquisitions or disposals).
- Confidential business information, trade secrets or commercially sensitive data.
- Personal data or contact details of business partners, employees or stakeholders.

The internet is a **permanent record**. Deleted content may still be accessible and discoverable.

## 8. Monitoring, Reporting and Market Awareness

- The Company reserves the right to monitor social media activity conducted using Company systems for compliance and legitimate business purposes.
- Staff registered on financial or share bulletin boards must disclose this to the Company.
- Significant rumours, misinformation or issues that could impact the Company's share price must be reported immediately to the **CEO, Chair and COO**, and may require notification to **Aquis**.

## 9. Recruitment and Due Diligence

Publicly available social media content may be reviewed during recruitment or due diligence processes, in accordance with **data protection, equal opportunities and employment law**.

## 10. Breaches and Disciplinary Action

Breaches of this policy are taken seriously and may result in:

- Disciplinary action up to and including **summary dismissal for gross misconduct**
- Removal of offending content
- Reporting to regulators where required

All staff must cooperate fully with investigations into potential breaches.

## 11. Review and Maintenance

- This policy will be **reviewed annually by the Board** and updated as required to reflect regulatory or business changes.
- When in doubt: **do not post**. Seek guidance from the CEO or Chair.

This social media Policy was reviewed 19 April 2026.

The Board of Directors approved this Policy on 7 May 2026.