

ST BARBARA GROUP - SOCIAL MEDIA POLICY

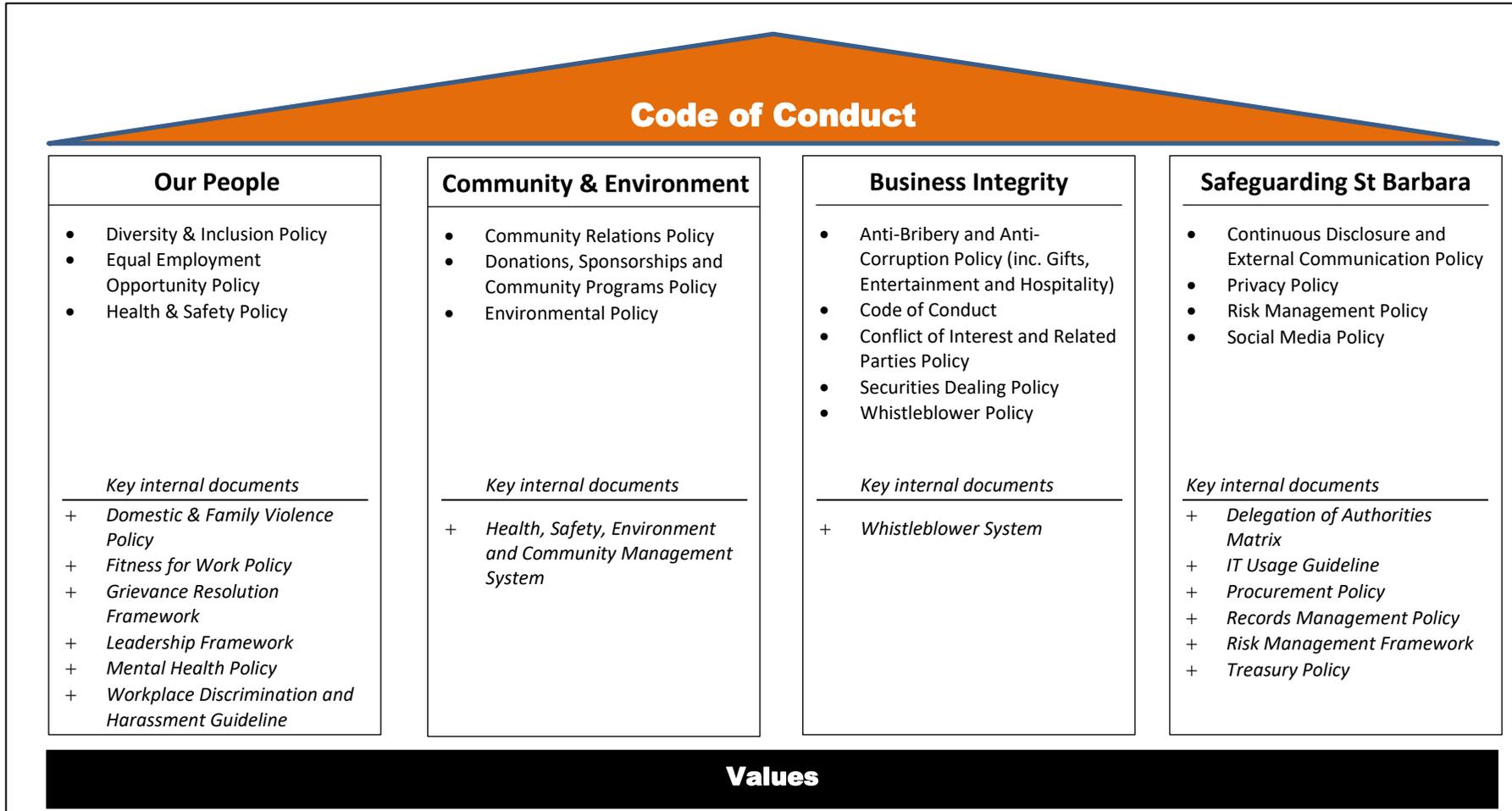
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St Barbara Code of Conduct Framework

This Code is one component of St Barbara’s Code of Conduct Framework.

At the time of publication of this Code, the Code of Conduct Framework includes the following policies and related documents:



● = Policy published on www.stbarbara.com.au

○ = Document in preparation

+ = Internal document published on ROCKi

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1. SUMMARY OF THIS POLICY

This Social Media Policy (**Policy**) outlines the standards St Barbara Personnel must observe when using Social Media for business or personal use, the circumstances in which St Barbara will monitor your use of Social Media and the action St Barbara will take in respect of breaches of this Policy.

Content published on the internet can remain in the public domain indefinitely and can be replicated far beyond the initial posting. Once published, it can be impossible to retract or remove a posting. This Policy has been prepared to avoid inappropriate use of Social Media, which has the potential to adversely impact the reputation of St Barbara and the personal reputation of St Barbara employees.

In accordance with St Barbara's Acceptable IT Usage Guideline, St Barbara monitors the use of Social Media by employees on the St Barbara network.

Breach of this Policy may result in disciplinary action up to and including removal of access to Social Media, termination of employment for employees, or termination of contract for contractors or consultants.

2. PURPOSE

St Barbara Limited and its subsidiaries (collectively, **St Barbara**), requires and expects that its directors, officers, employees, agents, contractors and any other party representing St Barbara, wherever they are in the world, will act ethically, honestly, with integrity and in compliance with the law.

All St Barbara Personnel are expected to act at all times in accordance with our Values:

- We act with honesty and integrity
- We treat people with respect
- We value working together
- We deliver to promise
- We strive to do better.

The purpose of this Policy is to help St Barbara Personnel understand how to use Social Media appropriately.

3. SCOPE

This Policy applies to all individuals at all levels who are employed by, act for, or represent St Barbara anywhere in the world (referred to in this Policy as **you**, or **St Barbara Personnel**), including:

- (a) directors;
- (b) officers;
- (c) managers;
- (d) employees;
- (e) contractors;
- (f) consultants;

- (g) agents; and
- (h) any other person representing or acting on behalf of St Barbara.

This Policy applies to St Barbara Personnel irrespective of their employment status (that is, whether they are employed on a full-time, part-time, maximum term, casual or temporary basis).

This Policy applies whenever St Barbara Personnel use Social Media where that use may impact on St Barbara and applies irrespective of whether the use of Social Media occurs for work purposes or for private use, during or outside of work hours, at the workplace or outside the workplace, or on St Barbara assets or non-St Barbara assets.

4. WHAT IS SOCIAL MEDIA

For the purposes of this Policy, **Social Media** means any online social network that is a website or an app that allows a user to create and share content online. This often involves sharing comments, messages, photos and videos.

Examples of online social networks include, but are not limited to:

- instant messaging – Lync, SMS, WhatsApp, Viber, MS Messenger;
- social networking – Facebook, LinkedIn, Yammer, Snapchat, dating websites;
- video and photo sharing – YouTube, Flickr, Instagram, Pinterest
- blogs – Twitter, Tumblr, corporate, professional and personal blogs;
- forums and discussion boards – Whirlpool, Yahoo! Groups;
- online encyclopaedias – Wikipedia;
- freelancing websites – Uber, Freelancer.com, Airtasker; and
- social media applications.

5. APPROPRIATE USE OF SOCIAL MEDIA

St Barbara Personnel must observe the following standards when using Social Media for official business or in a personal capacity:

- (a) Comments on Social Media must not breach any relevant St Barbara policies, including, but not limited to St Barbara's:
 - Values;
 - Code of Conduct;
 - Continuous Disclosure and External Communication Policy;
 - Securities Dealing Policy;
 - Workplace Discrimination & Harassment Guideline;
 - Privacy Policy; and
 - Acceptable IT Usage Procedure.
- (b) St Barbara Personnel must not make comments or postings of the following nature:
 - insulting or discriminatory comments;

- sexually provocative, obscene or harassing statements;
- inflammatory or defamatory comments;
- comments that bully or degrade others;
- misleading, deceptive or unsubstantiated claims;
- personal or confidential information obtained in their capacity as an employee/contractor of St Barbara, including but not limited to unreleased financial information, exploration results, merger and acquisition activities, and any commercial terms with St Barbara suppliers;
- any information which may damage St Barbara or St Barbara's share price or reputation; or
- any negative remarks or implications regarding St Barbara, or St Barbara employees, contractors, directors and officers;
- any information which could result in harm, harassment or endanger St Barbara employees, contractors, directors and officers; and
- comments that imply that St Barbara endorses, approves or is in any way associated with your personal views expressed on any social media platform.

(c) St Barbara Personnel must:

- be respectful of others when using Social Media. Remember that anything you post will remain available to be read by millions of people on the internet and comments can easily be taken out of context by people in different industries and cultural backgrounds.
- adhere to the terms of use of the relevant Social Media platform or website, as well as copyright, privacy, defamation, contempt of court, discrimination, harassment and other applicable laws.

6. OFFICIAL USE OF SOCIAL MEDIA

The use of Social Media for official use on behalf of St Barbara requires prior approval from the Company Secretary and/or Managing Director & CEO in accordance with and subject to the Continuous Disclosure and External Communication Policy.

St Barbara currently uses Social Media (including Facebook, Twitter and LinkedIn) for various business uses including:

- investor relations as a means of communicating with shareholders, analysts and interested observers; and
- human resources to advertise vacant positions.

In official communication St Barbara Personnel must use their real name or official St Barbara on-line alias, not fake identities.

Unless authorised to do so, St Barbara Personnel must not present themselves as representing St Barbara's views in any way. If circumstances necessitated publishing something that identifies you as a St Barbara employee or contractor without explicit approval, be clear you are speaking for yourself and use a disclosure such as "The statements or opinions expressed above [or on this site] are my own and do not necessarily represent those of St Barbara".

7. PERSONAL USE OF SOCIAL MEDIA

Inappropriate use of Social Media, even in a personal capacity, has the potential to adversely impact the reputation of St Barbara and the personal reputation of St Barbara employees and others, which can extend to financial loss for St Barbara and individuals.

St Barbara Personnel must ensure that personal use of Social Media using St Barbara assets:

- (a) is minimal and takes place substantially outside of rostered working hours;
- (b) does not breach any of the rules set out in this Policy; and
- (c) does not interfere with business or St Barbara's commitments.

8. CONSEQUENCES OF BREACHING THIS POLICY

All St Barbara Personnel are individually responsible for ensuring they comply with this Policy at all times.

St Barbara Personnel should be aware that any use of Social Media (irrespective of whether the use of Social Media occurs for work purposes or for private use, during or outside of work hours, at the workplace or outside the workplace, or on St Barbara assets or non-St Barbara assets) may be monitored and, where breaches of this Policy are found, action may be taken under our Discipline Management Process. St Barbara reserves the right to restrict or prevent access to certain Social Media websites on St Barbara IT assets if St Barbara considers personal use to be excessive or there has been a breach of this Policy.

Failure to comply with this Policy may result in disciplinary action up to and including termination of employment for employees, or termination of contract for contractors or consultants. St Barbara Personnel may also be individually subject to other legal consequences for failing to comply with this Policy, including potential exposure to legal claims by St Barbara and third parties, fines or other penalties.

If a breach of this Policy appears to constitute an offence under an applicable law, St Barbara may be obliged to refer the suspected breach to the appropriate law enforcement agencies.

9. FURTHER GUIDANCE

Please contact your Immediate Manager or the Company Secretary if you have any questions relating to this Policy.

10. POLICY REVIEW

This Policy is to be reviewed at least once every 2 years.