

## External Communications Policy

### BRAZILIAN RARE EARTHS LIMITED

ACN 649 154 870

(Company)

## 1 Purpose

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- (a) Ensure that the Company's, and its subsidiaries', employees, contractors and service providers adhere to the content, restrictions and approval process required prior to the release to an external party any communication which may be attributed to the Company or any of its subsidiaries.
- (b) Ensure that all external messaging and communication complies with the Company's Continuous Disclosure and Securities Trading policies and with the strict reporting and continuous disclosure requirements in relation to material information the Company is bound by as a listed company on the ASX. Penalties in relation to breaches of these ASX requirements are significant.
- (c) Minimise the risk of a regulatory breach, adverse publicity, damage to the Company's reputation by ensuring all external messaging and communication is in line with the Company's values, policies and principles.
- (d) Establish the protocol for handling media enquiries and for providing Company related information to external parties.

## 2 Scope

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- (a) This policy applies to:
  - (i) all Company employees, contractors and service providers (and all employees, contractors and service providers of subsidiaries of the Company);
  - (ii) any written or verbal communication to an external audience on behalf of or in relation to the Company or any of its subsidiaries, including but not limited to shareholders, investors, any form of media, analysts, industry representatives, Government representatives, statutory and regulatory bodies, community stakeholders, unions, industrial tribunals or external participants at networking events or workshop; and
  - (iii) the use of social media.
- (a) This policy must be read in conjunction with the Continuous Disclosure Policy. In all instances the requirements of the Continuous Disclosure Policy take precedence over the requirements of this External Communications Policy. For the avoidance of doubt, any External Communication that breaches the Continuous Disclosure Policy is also in breach of this External Communications Policy.

## 3 Definitions

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<b>Company Spokesperson</b>	means each of the Chairperson and the Managing Director of the Company (together, <b>Spokespeople</b> ).
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<b>External Communication</b>	means all communications intended for an external party, or that have a reasonable chance of being received by an external party.
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#### **4 Approval Process for External Communications**

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- (a) Unless you are a Company Spokesperson, you must not release, publish, submit or present an External Communication to any external party that expresses views, opinions or policy which may be attributed to the Company or any of its subsidiaries, or which contains information, the disclosure of which, would constitute a breach of the Continuous Disclosure Policy (**Prohibited External Communication**).
- (b) The Company Spokespeople may, from time to time, designate others to release, publish, submit, present and/or approve content in a Prohibited External Communication and on such occasions must provide prior written approval of such designated authority.
- (c) Nothing in this policy shall prevent the Company's, and its subsidiaries', employees, contractors and service providers from undertaking routine communications with external parties in the ordinary course of their assigned duties and responsibilities, unless such communications meet the criteria to be considered a Prohibited External Communication or would otherwise breach the Continuous Disclosure Policy or be illegal.
- (d) The approval process does not apply to statutory government reporting.

#### **5 Investor and Media Relations**

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All investor enquiries and media enquiries, including local newspapers, local radio, community websites, social media websites, bloggers, or local television must be directed to a Company Spokesperson.

#### **6 Market speculation and rumour**

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- (a) Except in the circumstances where an announcement to ASX may be required, the Company generally does not respond to media comment (including social media) or market speculation.
- (b) This policy must be strictly adhered to. However, a Company Spokesperson may provide a response in order to correct speculation if it contains factual errors that could materially affect the Company.
- (c) The Company's, and its subsidiaries', employees, contractors or service providers who become aware of market speculation or rumour should immediately communicate that information to a Company Spokesperson.

#### **7 Media and ASX Releases**

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All media releases and ASX releases must be approved by the Managing Director or another Company Spokesperson, with reference to, and in compliance with the Continuous Disclosure Policy where applicable, and applicable laws.

## **8 Inadvertent Disclosure**

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If a Prohibited External Communication occurs or is anticipated, a Company Spokesperson must be notified immediately, including for the purpose of them urgently identifying all steps required to ensure legal compliance (such as in relation to the ASX Listing Rules and Corporations Act disclosure requirements).

## **9 Review**

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This policy will be reviewed annually, or more often as required by changes to ASX Listing Rules, the Corporations Act or other legally binding disclosure requirements and revised if circumstances warrant.