

AXXIS TECHNOLOGY GROUP LTD (to be renamed ECS Botanics Holdings Ltd)

ACN 009 805 298

Social Media Policy

1. Introduction

- 1.1. The Company has the following Social Media Policy to regulate the use of social media by the Company Personnel and people associated with the Company.
- 1.2. By complying with this Policy, the Company and its Personnel, will ensure that trading in the Company's securities takes place in a market which is orderly and informed and is not, or is not likely to be, false.
- 1.3. To preserve the reputation and integrity of the Company, this Policy will apply to wide range of technologies commonly referred to as 'social media' which fundamentally are no different to other forms of communication, but do represent a risk as well as an opportunity because they can connect large numbers of people with relative ease. The rationale with this Policy is to manage the risks associated with the use of technology platforms and tools of this nature.
- 1.4. This Policy applies to all the Company Personnel.
- 1.5. This Policy should be read in conjunction with the Company's Shareholder Communications Strategy.

2. Explanation of Terms

- 2.1. In this Policy:

ASX means Australian Securities Exchange;

Board means the board of directors of the Company;

CFO means the chief financial officer, or equivalent, of the Company;

Company means Axxis Technology Group Ltd (ACN 009 805 298) (to be renamed ECS Botanics Holdings Ltd);

Company Secretary means the company secretary of the Company;

Director means a director of the Company;

Executive means the employees of the Company who manage the Company pursuant to the directions and delegations of the Board;

Group means the Company and its controlled entities;

MD means the Managing Director or Chief Executive Officer (or equivalent);

Personnel means the Company's directors, executive, employees and contractors;

Policy means this Social Media Policy; and

Social media means online social networking and web technologies, services and tools used for publishing, sharing and discussing information, including without limitation: blogs or web logs, electronic forms or message boards, micro-

blogs, photo and video sharing sites, social bookmarking sites, social networking sites, virtual worlds and wikis and any other electronic media that allow individual users to upload and share content regardless of format.

3. Scope of Policy

- 3.1. This Policy outlines requirements for compliance with confidentiality, governance, legal, privacy and regulatory parameters when using social media to conduct the Company business.
- 3.2. This Policy is intended to apply to both the Company and Group entities. References to the Company in this Policy should be read as referring to the Group, as appropriate.
- 3.3. This Policy aims to:
 - (a) inform appropriate use of social media tools for the Company;
 - (b) promote useful market engagement through the use of social media;
 - (c) minimise problematic communications; and
 - (d) manage the inherent challenges of speed and immediacy.
- 3.4. This Policy should be read in conjunction with other relevant policies and procedures of the Company and is not intended to cover personal use of social media where the author publishes information in their personal capacity and not on behalf of, or in association with the Company and no reference is made to the Company, its directors, employees, policies and products, suppliers, shareholders, other stakeholders or Company related issues. Notwithstanding, the Company Personnel should act responsibly, with decorum and within socially accepted guidelines as to taste and decency when publishing information in their personal capacity as failure to do so may lead to reputational damage for themselves and by extension the Company.

4. Legislative & Policy Framework

- 4.1. Personnel are expected to demonstrate standards of conduct and behaviour that are consistent with relevant legislation, regulations and policies, including the following non-exhaustive list:
 - (a) Corporations Act;
 - (b) ASX Listing and Operating Rules;
 - (c) the Company's employment contracts; and
 - (d) the Company's suite of corporate governance policies.

5. Policy Requirements

- 5.1. When using social media, Personnel are expected to:
 - (a) adhere to the Company policies and procedures;
 - (b) behave with caution, courtesy, honesty and respect;
 - (c) comply with relevant laws and regulations;

- (d) only disclose information that has already been released to the market; and
- (e) reinforce the integrity, reputation and values the Company seeks to foster.

5.2. The following content is not permitted under any circumstances:

- (a) information which is material price sensitive and has not yet been released to the market;
- (b) abusive, profane or language of a sexual nature;
- (c) content not relating to the subject matter of that blog, board, forum or site;
- (d) content which is false or misleading;
- (e) confidential information about the Company or third parties;
- (f) copyright or trade mark protected materials;
- (g) discriminatory material in relation to a person or group based on age, colour, creed, disability, family status, gender, nationality, marital status, parental status, political opinion or affiliation, pregnancy or potential pregnancy, race or social origin, religious beliefs or activity, responsibilities, sex or sexual orientation;
- (h) illegal material or materials designed to encourage law breaking;
- (i) materials that could compromise the safety of any person;
- (j) materials which would breach applicable laws (Corporations Act and regulations, ASX Listing and Operating Rules, defamation, privacy, consumer and competition law, fair use, copyright, trade marks);
- (k) material that would offend contemporary standards of taste and decency;
- (l) material which would bring the Company into disrepute;
- (m) personal details of the Company directors, employees or third parties;
- (n) spam, meaning the distribution of unsolicited bulk electronic messages; and
- (o) statements which may be considered to be bullying or harassment.

5.3. If you have any doubt about applying the provisions of this policy, the Company Secretary is the correct person to check with prior to using social media to communicate on behalf of the Company. Depending upon the nature of the issue and potential risk, it may also be appropriate to consider seeking legal advice prior to publication.

6. Policy Principles and Practices

Media Statements

- 6.1. Media statements or announcements cannot be made through social media channels unless first released to ASX.

Expertise

- 6.2. Personnel should not comment outside his or her area of expertise.

Confidential Information

- 6.3. Personnel may only discuss publicly available information. Personnel must not disclose confidential information, internal discussions or decisions of the board, employees, consultants or other third parties.

Accuracy

- 6.4. Information published should be accurate, constructive, helpful and informative. Personnel must correct any errors as soon as practicable and not publish information or make statements which are known to be false or may reasonably be taken to be misleading or deceptive.

Identity

- 6.5. Personnel must be clear about their professional identity, or any vested interests and must not use fictitious names or identities that deliberately intend to deceive, mislead or lie or participate in social media anonymously or covertly or via a third party or agency.

Personal Opinions

- 6.6. Personnel should not express or publish a personal opinion on the Company generally or about the Company business via social media and should be mindful of market disclosure rules when discussing or commenting on the Company matters. Generally, Personnel should not express personal opinions on the Company decisions or business nor be critical of the Company and its personnel. If it is not possible to separate official the Company positions from personal opinions, Personnel should consider using a formal disclaimer to separate interests.

Privacy

- 6.7. Personnel should be sensitive to the privacy of others. However, the Company is not required to seek permission from anyone who appears in any photographs, video or other footage before sharing these via any form of social media if it is the copyright owner of the relevant image or footage.

Intellectual Property

- 6.8. Personnel will use the Company's own intellectual property where possible and shall obtain prior consent where the Company is not the creator or copyright owner, to use or reproduce copyright material including applications, sound recordings (speeches, music), footage (cinematographic vision), graphics (graphs, charts, logos, clip-art), images, artwork, photographs, publications or musical notation. Personnel will also typically seek permission before publishing or

uploading the intellectual property of a third party or before linking to another site or social media application.

Defamation

- 6.9. Personnel will not comment, contribute, create, forward, post, upload or share content that is scurrilous, malicious or defamatory.

Respect

- 6.10. Personnel will endeavour to be courteous, patient and respectful of the opinions of others, including detractors and the discourteous.

Discrimination

- 6.11. Personnel will be conscious of anti-discrimination laws and must not publish statements or information which may be discriminatory in a human rights sense.

Language

- 6.12. Personnel will remain mindful of language and expression and not lapse into excessive use of colloquialisms, having regard to an international audience.

State of Mind

- 6.13. Personnel should not use social media when irritated, upset or tired.

Personal Privacy

- 6.14. Personnel should protect their personal privacy and guard against identity theft.

Modification and moderation

- 6.15. Personnel should ensure that any social media sites created or contributed to can be readily edited, improved or removed and appropriately moderated.

Responsiveness

- 6.16. The Company will endeavour to specify the type of comments and feedback that will receive a response and clearly communicate a target response time. Personnel are required to make it easy for audiences to reach the Company and/or its subsidiaries by publishing appropriate company telephone numbers, generic emails, LinkedIn, Twitter and Facebook accounts.

Monitoring

- 6.17. The Company reserves the right, for legal compliance purposes, to monitor social media usage on its systems without advance notice and consistent with any applicable state, federal or international laws. the Company may be legally required to produce logs, diaries and archives of social media use to judicial, law enforcement and regulatory agencies and will comply with any relevant requests. Personnel and other users should govern themselves accordingly.

If Uncertain

- 6.18. Personnel should seek advice from the Managing Director or Company Secretary on using social media or if unsure about applying the provisions of this Policy.

7. More Information

- 7.1. Any Company employee who has queries about this Policy should contact the Company Secretary.

8. Consequences of a Breach of this Policy

- 8.1. Personnel employees breaching this policy may be the subject of disciplinary action, performance management or review. Serious breaches may result in suspension or termination of employment or association. The Company reserves the right to remove, or instruct to remove, where possible, content that violates this Policy or any associated policies.
- 8.2. The requirements imposed by this Policy are separate from, and additional to, the legal prohibitions in the Corporations Act. Directors, officers, consultants and employees should be aware that they can be charged with criminal offences under the rules and regulations associated with the prevention of market manipulation, false trading, market rigging and misleading and deceptive conduct, all of which apply at law regardless of this Policy.
- 8.3. A breach of this Policy may lead to disciplinary action, which may include termination of employment or engagement.

9. Policy Review

- 9.1. This Policy is to be reviewed by the Board on a periodic basis.