

RIOT BLOCKCHAIN, INC. SOCIAL MEDIA POLICY

Purpose and Executive Summary

This Social Media Policy applies to all officers, directors, employees, and consultants of Riot Blockchain, Inc. and its affiliates (the “**Company**”) using social media at any time.

Social media has become a prevalent way for people to share information about their personal life and opinions with family, friends and others around the world. However, the use of social media when working for the Company also presents certain risks, and carries with it certain responsibilities, as social media can have a permanent and negative impact on the Company and its reputation.

Employees may not use social media at or away from work in a matter that interferes with the Company’s business or the work of its employees, results in the unauthorized disclosure of confidential information, is inconsistent with any of the Company’s policies and procedures, or is contrary to the Company’s best business interests and its reputation. Any conduct that is inconsistent with these concerns, that is deemed to adversely affect the Company or its affiliates, employees, shareholders, or other people who work on behalf of the Company, or that adversely affects the trading price of the Company’s common stock, may result in disciplinary action, up to and including termination of employment for cause.

Definitions and Use

“Social media” includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else’s website or blog, journal or diary, social networking or affinity website, web bulletin board or chat room (whether or not associated or affiliated with the Company), and any other form of electronic communication.

**** Important ****

The same principles and guidelines found in other Company policies (including, but not limited to, the Company’s Code of Ethics and Business Conduct, Corporate Communications Policy and Insider Trading Policy) apply to your activities online. Ultimately, you are solely responsible for what you post online. Before creating online content, consider the risks that are involved. Keep in mind that any of your conduct that interferes with the Company’s business or the work of its employees, results in the unauthorized disclosure of confidential information, is inconsistent with any of the Company’s policies and procedures, is contrary to the Company’s best business interests and its reputation, adversely affects the Company or its affiliates, employees, shareholders, or other people who work on behalf of the Company, or is deemed to adversely affect the trading price of the Company’s common stock, may result in disciplinary action up to and including termination of employment.

Noncompliance with this Social Media Policy may result in potentially significant reputational and legal risk to the Company.

All information contained within this document is subject to any applicable country, state, provincial and/or local laws.

Know and Follow the Rules

You are required to ensure that your postings are consistent with the Company’s principles and policies.

1. **Do not express viewpoints of the Company.** Do not commit the Company to any action or viewpoint or provide the appearance that you are representing the Company in your online communications, unless you have been authorized to do so by the Public Relations Representative.

2. Do not post Company Information. Do not post any business-related confidential or internal-use only information that you obtain or learn about as part of your job duties with the Company or any information that might impact the trading price of the Company's common stock. Do not post partial or incomplete information that may be susceptible to being taken out of context. Such information includes the following examples: the development of systems, products, processes and technology; personally identifiable information of competitors; nonpublic financial information; trading characteristics of the Company's common stock; marketing strategies; inventions not yet patented; or other business-related confidential or proprietary information.
3. Respect financial disclosure laws. Be very careful and do not make statements about the Company's financial performance or prospects, and do not make statements that in any way could violate federal, provincial, or state securities laws such as the disclosure of material, nonpublic information. It is illegal to communicate or give a "tip" on inside information to others so that they may buy or sell stocks or securities. Do not post any information that could appear to influence the trading price of the Company's common stock or other securities. Do not engage in conduct that is disloyal, competitive, or damaging to the Company or its reputation.
4. Respect intellectual property rights, including copyright laws. Reference or cite to sources appropriately and accurately. The Company's logos, trademarks, and graphics may not be used without prior written approval of the Public Relations Representative. Do not misrepresent the Company's business operations, products or services.
5. Be thoughtful in all your communications and dealings with others, including via email and social media. Do not knowingly make false representations online, violate the law with what you say or do online, or make any negative comments about the Company's business operations, or shareholders online or in any social media format.
6. Do not use social media at work. Do not use the Company's email addresses to register on social networks, blogs or other online tools utilized for personal use. Employees are prohibited from using social media while on working time or on equipment the Company provides, unless it is work-related and authorized by the Public Relations Representative.
7. Retaliation is prohibited. The Company prohibits taking negative action against any employee for reporting a deviation from this policy or for cooperating in an investigation into suspected violations of this policy. Any employee who retaliates against another employee for reporting a deviation from this policy or for cooperating in an investigation into suspected violations of this policy will be subject to disciplinary action, up to and including termination of employment.
8. Do not respond to media commentary. Do not engage with the news media or industry analysts (for example, Wall Street Journal, CNBC and informal media sources such as online bloggers) to discuss Company strategy and/or business on the Company's behalf without Public Relations (PR) consultation and approval of the Public Relations Representative. To ensure that the Company communicates with the media in a consistent, timely, and professional manner about matters related to the Company, consult with the Public Relations Representative regarding any potential or proposed public statements regarding the Company or its business. The Company will respond to media requests for the Company's position only through the designated spokesperson(s).
9. Be respectful. Always be fair and courteous to fellow employees, customers, shareholders or other people who work with or on behalf of the Company or others in the online community. Avoid using statements, photographs, video, or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, or that may disparage employees, customers, or shareholders, or that might constitute harassment or bullying.
10. No expectation of privacy. Employees should have no expectations of privacy while using social media. Your postings can be reviewed by anyone, including the Company. The Company reserves the right to monitor comments or discussions about the Company, its employees, customers, shareholders, and the

industry, including products and competitors, posted on the Internet or any other social media by anyone, including employees and non-employees. Employees should also have no expectation of privacy while using Company equipment or facilities for any purpose. The Company reserves the right to monitor Internet, social media and Company e-mail usage and content at any time, with or without notice of such monitoring.

Media Contacts

The Chief Executive Officer and/or the Board of Directors of the Company may, from time to time, designate one or more Public Relations Representative(s) to be responsible for all media interaction by and on behalf of the Company. Unless specifically authorized in advance by the Public Relations Representative, employees, officers, directors and others working for the Company, are not permitted to speak to the media on the Company's behalf.

Additional Information

The Company's Social Media Policy may be updated at any time, with or without advance notice. If you have any questions about this policy or need further guidance, please contact the Company's Public Relations Representative.

Compliance Effective Date

This Social Media Policy is effective June 27, 2019.