WHISTLEBLOWER POLICY

Securities Regulators in Canada have established rules requiring that the audit committees of public companies develop procedures to receive and address complaints regarding accounting, internal accounting controls or auditing matters, and for a confidential, anonymous submission procedure for employees who have concerns regarding questionable accounting or auditing matters. To meet these requirements, as well as to discourage illegal activity and unethical business conduct and to promote a climate of accountability within Detour Gold Corporation (the “Company”), the Audit Committee of the Board of Directors has developed this Whistleblower Policy.

1. REPORTING RESPONSIBILITY

It is the responsibility of all directors, officers and employees, including contract employees and consultants (“Persons”), to report any wrongdoing or violations or suspected violations, including those relating to accounting, internal accounting controls, questionable accounting or auditing matters, applicable laws and regulations (including securities laws and regulations), and the Company’s Code of Business Conduct and Ethics in accordance with this Whistleblower Policy. Examples of issues to be reported are set out in Schedule “A” to this Policy.

2. NO RETALIATION

No Person who in good faith files a complaint, submits a concern or reports any wrongdoing or a violation or suspected violation shall suffer harassment, retaliation or adverse employment consequences as a result of doing so. An employee who retaliates against someone who has made such a filing, submission or report in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Company rather than seeking resolution outside the Company.

3. ACTING IN GOOD FAITH

Any Person filing a complaint, submitting a concern or reporting a wrongdoing or a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed. Any allegations that prove to be frivolous or unsubstantiated, and which prove to have been made maliciously or knowingly to be false, will be viewed as a serious disciplinary offense.

4. REPORTING PROCEDURE

Complaints or concerns about the Company should be submitted to a Person’s supervisor or to the Chief Financial Officer, recognizing however, that this depends on the seriousness and sensitivity of the issues involved and who is suspected of wrongdoing. Any issues brought to the attention of a supervisor or the Chief Financial Officer shall be immediately forwarded to the Chair of the Audit Committee.

As an alternative, complaints or concerns under this Whistleblower Policy may be submitted directly on a confidential and anonymous basis as follows:

(a) to the Chair of the Audit Committee by mail or courier to:
PRIVATE AND CONFIDENTIAL
Detour Gold Corporation
Commerce Court West
199 Bay Street, Suite 4100, Box #121
Toronto, Ontario, M5L 1E2
Attention: Chair of the Audit Committee

(b) to Wiklow Corporate Services Inc. (“Wiklow”), an independent service provider the Company has contracted with to manage employee concerns, as follows:

By telephone at: Toll free 1-877–266-2579 in Canada and United States
By internet: www.wiklow.com
Login ID: Detour
Password: D4gold

5. CONFIDENTIALITY

The Company will treat all disclosures by Whistleblowers as confidential and privileged to the fullest extent permitted by law. The Company will exercise particular care to keep confidential the identity of any Person making a disclosure under this procedure until a formal investigation is launched. Thereafter, the identity of the Person making the Disclosure may be kept confidential, if requested, unless such confidentiality is incompatible with a fair investigation or unless such disclosure is required by law. In such instances, the Person making the disclosure will be so informed in advance of his or her being identified with the disclosure. Where disciplinary proceedings are invoked against any individual following a disclosure under this procedure, the person subject to such proceedings is normally entitled to know the name of the Person making complaint.

The Company encourages individuals to put their name on any disclosure they make, but any Person may also make an anonymous disclosure. In responding to an anonymous disclosure, the Company will pay due regard to fairness to any individual named in the disclosure, the seriousness of the issue raised, the credibility of the information or allegations in the disclosure and the prospects of an effective investigation and discovery of evidence.

Use of non-identifiable third party email address may be used to maintain anonymity.

6. HANDLING OF REPORTS

The Audit Committee of the Board of Directors shall address all reports submitted to it with complaints or concerns, including those regarding wrongdoing, corporate accounting practices, internal accounting controls or auditing matters. All reports submitted to the Audit Committee of the Board of Directors will be investigated as quickly as possible, taking into account the nature and complexity of the disclosure and the issues raised therein, and appropriate corrective action will be taken if warranted by the investigation. The Audit Committee may retain independent legal counsel, accountants or others to assist it in its investigation.

If, on preliminary examination the concern, issues or facts raised or alleged in any Disclosure are judged to be wholly without substance or merit, the matter shall be dismissed and the Whistleblower informed of the decision and the reasons for such dismissal. If the allegation(s) have been made in bad faith, or are frivolous or malicious, the Whistleblower may be subject to disciplinary action. If it is judged that the allegation(s) or issue(s) covered in the Disclosure have merit, the matter shall be dealt with in accordance with this policy, the Company’s normal disciplinary procedures, and/or as otherwise may be deemed appropriate according to the nature of the case.
7. RETENTION OF RECORDS

The Audit Committee will maintain a record of all concerns or complaints received regarding accounting, internal accounting controls or auditing matters, tracking their receipt, investigation and resolution. The records will be retained for a period of time judged to be appropriate by the Audit Committee based on the nature of the concern and in compliance with applicable laws and document retention policies.

8. POLICY REVIEW

The Audit Committee will review and evaluate this Policy on an annual basis to determine whether the Policy is effective in providing a confidential and anonymous procedure to report violations or complaints regarding accounting, internal accounting controls or auditing matters.

9. PUBLICATION

This Policy will be posted on the Company’s website at www.DetourGold.com.
EXAMPLES OF MATTERS TO BE REPORTED

Fraud, Theft
Accounting Irregularities, Financial Statement Disclosure Issues
Non-compliance with Internal Accounting Controls
Workplace Violence
Substance Abuse
Discrimination, Harrassment
Falsification of Company Records
Conflicts of Interest
Release of Proprietary Information
Safety/Security Violations
Malicious Property Damage
Violations of Securities Laws (including insider trading)
Breaches of other Applicable Laws (environmental, employment, health and safety laws)
Ethics Violations