

DETOUR GOLD

CODE OF BUSINESS CONDUCT AND ETHICS

Detour Gold Corporation (together with its subsidiaries, “**Detour Gold**” or the “**Company**”) is committed to conducting its business in accordance with applicable laws, rules and regulations, and with high standards of business ethics.

This Code of Business Conduct and Ethics (the “**Code**”), established by the Board of Directors of Detour Gold, is designed to detect and deter wrongdoing and to promote honest and ethical conduct, including the ethical handling of actual or perceived conflicts of interest; compliance with applicable laws and regulations; prompt internal reporting of violations of the Code to appropriate persons identified in the Code; and accountability for adherence to the Code.

1. COMPLIANCE

The Code applies to all directors, officers, employees and consultants¹ of the Company. (“**You**” as used in this Code refers to all such persons, as appropriate.) In addition to your responsibility to comply with the Code, it is your responsibility to prevent others from violating these standards if you are in a position to do so. If you are not in a position to do so, it is your responsibility to bring the matter to the attention of your immediate supervisor or use the reporting procedures set out in the Company’s Whistleblower Policy.

Detour Gold’s directors, officers, employees and consultants found to be acting in violation of this Code may be subject to disciplinary action, including termination of employment where permitted by local law. Violations of this Code may also constitute violations of the local laws in each jurisdiction in which Detour Gold operates and may result in civil or criminal penalties.

The Code does not create contractual rights for you or other third parties.

2. AVOIDING QUESTIONABLE OR ILLEGAL PRACTICES

The Company’s policy is to comply with all laws and regulations that apply to its business within the jurisdictions in which it operates, and to avoid any activity that may be regarded as questionable or unethical. Fraudulent, illegal or unethical acts will not be tolerated. No action that would otherwise be questionable is permissible simply because it is customary in a particular jurisdiction, location or business.

If you are confronted with a situation that raises an issue under this Code, ask yourself these questions:

- Is the life, health or safety of anyone, or the environment, endangered by the action?
- Is it legal?

¹ Consultants means individuals that are consultants to or independent contractors of the Company.

- Does it feel honest, fair and ethical?
- Does it compromise anyone's trust or integrity?
- Would the public disclosure of the activity in any way be embarrassing to you, the Company, its directors and officers or any other affected employees or consultants of the Company?

You should be sufficiently familiar with any laws and regulations and Company policies and procedures that apply to your area of work and responsibility that will permit you to recognize possible breaches and to know when to seek advice. If in doubt, you should discuss the matter with your immediate supervisor or use the reporting procedures set out in the Company's Whistleblower Policy.

3. HONEST CONDUCT AND INTEGRITY

When representing the Company, it is important that you deal honestly and fairly with the Company's securityholders, joint venture partners, suppliers, customers, professional advisors, competitors, employees and consultants, other stakeholders and anyone else with whom you have contact in the course of performing your job. You should not take any advantage of anyone through actions such as manipulation, concealment, misappropriation or abuse of confidential information, falsification, misrepresentation of material facts, undue influence or any other unfair dealing practice. You also should not give any advantage to anyone for reason of personal relationship, personal benefit or other reasons not involving the best interest of the Company.

It is Detour Gold's policy that neither the Company nor any of its directors, officers, employees and consultants shall pay, offer to pay, or promise to give anything of value, directly or indirectly, to any government official or First Nations official (e.g., Chief or his/her family) for the purpose of influencing an official act or decision related to retaining or obtaining business or directing business to any person.

Detour Gold places high importance on the integrity of its relationships with government agencies and officials and therefore requires that transactions with all government or similar officials and political parties do not compromise the integrity and ethical business practices of Detour Gold. The Company's policy is firm and unconditional. Under no circumstances will the Company ever make a payment prohibited by law. If you are ever solicited for such a payment, or if you become aware of any instance where any Company employee, consultant, officer, director, agent or representative of the Company or its joint ventures proposes to offer such a payment or is otherwise involved in such illegal activity, you are to report the matter to your immediate supervisor, or use the reporting procedures set out in the Company's Whistleblower Policy. Any employee, consultant, officer, director, agent or representative that participates in any scheme to pay such an illegal payment will be terminated immediately.

4. CORPORATE OPPORTUNITIES

All directors, officers, employees and consultants owe a duty of loyalty to the Company, which includes a duty to advance the Company's legitimate interests when the opportunity to do so arises. Accordingly, you may not use your position at the Company or the Company's name, property, information or goodwill for personal gain or for the gain of others. You are further prohibited from taking advantage of an opportunity that is discovered through the use of any

corporate property, information, contacts or your position with the Company. All such opportunities, actual or perceived, should be reported to your immediate supervisor.

5. CONFLICTS OF INTEREST

A conflict of interest arises when you take actions or have interests that conflicts in any way with the best interests of the Company. You must take care to avoid any direct or indirect involvement or understanding that might result in such a conflict or create the appearance of such a conflict. You may not make any investment, accept any position or benefit, participate in any transaction or business arrangement or otherwise act in a manner that creates or appears to create a conflict of interest, unless you make full disclosure of all facts and circumstances to, and obtain prior written approval of, your immediate supervisor (in the case of officers other than the CEO, employees and consultants) or the Corporate Governance and Nominating Committee of the Board (in the case of directors and the CEO).

The following are examples of conflict of interest situations which generally must be avoided or which may raise a question:

- You or a member of your immediate family has a financial interest in or loan from a business which is a joint venture partner, optionor or optionee, competitor, customer or supplier of the Company or which otherwise does business with the Company (an investment in the securities of a publicly traded company normally would not be considered to present a conflict of interest unless it represented a material part of your savings);
- You or a member of your immediate family has an ownership interest in, or enters into a transaction with, a company that (i) directly competes with Detour Gold in connection with its exploration of precious metals; or (ii) does business with Detour Gold (i.e., a supplier).
- You or a member of your immediate family receives improper personal benefits or solicits a gift as a result of your position at Detour Gold.

The giving or accepting of gifts can adversely affect the Company's reputation for fair dealing and also create conflicts of interest. You may give or receive unsolicited gifts or entertainment only in cases where the gifts or entertainment are of nominal value, are customary to the industry, will not violate any laws, and will not influence nor appear to influence the recipient's judgment or conduct and as otherwise permitted under any gift or entertainment policy of the Company.

For these reasons, you must fully disclose to your immediate supervisor and/or the Corporate Governance and Nominating Committee all circumstances that could be perceived as involving a conflict of interest between the Company and you or members of your family. Full disclosure enables the Company to resolve unclear situations and to ethically handle conflicts of interest before any difficulty can arise. To the extent a conflict of interest cannot be avoided in a reasonable fashion, then appropriate procedures will be put in place to ensure that there is full disclosure and to minimize the involvement of the conflicted individuals in the relationship giving rise to the conflict.

6. PROTECTION AND PROPER USE OF COMPANY ASSETS

You are entrusted with the care, management and cost-effective use of the Company's property and you are not to make use of these resources for your own personal benefit or for the personal benefit of anyone else. Detour Gold's assets must be protected from loss, damage, theft, misuse, and waste. Company assets should be used for legitimate business purposes and personal use should be kept to a minimum. The Company's assets include your time at work and work product, the Company's equipment, vehicles, computers, software, telephone and Internet systems. Directors, officers, employees and consultants of the Company should exercise prudence in incurring and approving business expenses, work to minimize such expenses and to ensure that such expenses are reasonable and serve Detour Gold's business interests. Theft, carelessness and waste have a direct impact on Detour Gold's profitability.

You have no expectation of personal privacy in connection with the use of the Company's assets unless otherwise permitted by local law. Detour Gold reserves the right to monitor use of the Company's property, premises and resources (for example, office sites, operations sites, computers, email, phones, proprietary information, etc.) in accordance with applicable laws and as necessary to protect the interests of the Company. Detour Gold monitors facilities and equipment to promote safety, identify potential unlawful activity to the extent possible, and comply with legal requirements.

7. CONFIDENTIAL INFORMATION & PERSONAL INFORMATION

Detour Gold wants its directors, officers, employees and consultants to be well informed about its business, its plans for the future, and the successes and challenges the Company has along the way. In return for this openness, the Company places trust in its directors, officers, employees and consultants to maintain, without need for court orders or other legal requirements, the confidentiality of our proprietary information.

You are required to maintain the confidentiality of all confidential information that you receive or become privy to in connection with your activities on behalf of the Company, except when disclosure is authorized or legally mandated. For these purposes, confidential information includes, but is not limited to, any non-public information concerning Detour Gold's business and affairs, results or prospects and any non-public information provided by a third party.

Detour Gold's policy on maintaining confidentiality is set forth in its Disclosure, Confidentiality and Insider Trading Policy. The obligation to safeguard Detour Gold's confidential information continues after employment with or services to the Company ends.

Detour Gold will maintain the confidentiality of personal information entrusted to it by our employees, customers or service providers. Personal information is any information about an identifiable individual, other than the person's business title or business contact information when used or disclosed for the purpose of business communications. Personal information does not include anonymous or non-personal information (i.e., information that cannot be associated with or tracked back to a specific individual).

Detour Gold will collect, use and disclose personal information only with the knowledge and permission of the affected individual unless necessary and permitted by local laws. Access to personal information within Detour Gold generally will be restricted to those employees with legitimate business reasons to review the information. If you have such access, you are required to safeguard this information as required by applicable law in your use of online and offline

systems, processes, products and services that involve the use, storage or transmission of any such information.

We may communicate this information to agents or service providers, but only if they have agreed to be bound by rules regarding privacy and confidentiality that are appropriate in the circumstances.

8. PUBLIC DISCLOSURE

The Company is obligated to make full, fair, accurate, timely and understandable disclosure of certain information regarding the Company and its operations in compliance with applicable laws and regulations. The management of Detour Gold is generally responsible for preparing the Company's public filings, reports and communications and for ensuring that such disclosure complies with all applicable laws and regulations. Directors, officers, employees and consultants must provide all necessary information regarding the Company and its operations to management when requested and must inform management if they become aware that any information in any of the Company's public filings, reports and communications was untrue or misleading at the time that such public filing, report or communication was made. Employees, consultants, officers and directors must also inform management if they have information that would affect any the Company's public filings, reports or communications to be made in the future.

Detailed information regarding Detour Gold's policy governing public disclosure is set forth in the Disclosure, Confidentiality and Insider Trading Policy. Directors, officers, employees and consultants involved in the Company's disclosure process are responsible for acting in furtherance of such policy, and are responsible for thoroughly understanding and complying with such policy.

9. INSIDER TRADING

The success of Detour Gold in the market place requires that we maintain the trust and confidence of the investment community. All directors, officers, employees and consultants of Detour Gold must act with integrity when trading public securities, adhering to all applicable laws.

Generally, you are prohibited from trading Detour Gold's securities while in possession of undisclosed material information about the Company. In addition, you are prohibited from recommending, "tipping" or suggesting that anyone else buy or sell securities of the Company on the basis of undisclosed material information about the Company. If, in the course of your employment, you obtain or are in possession of undisclosed material information about another entity, you are prohibited from trading in the securities of that other entity while in possession of such information or "tipping" others to trade on the basis of such information. Violation of insider trading laws can result in severe fines and criminal penalties, as well as disciplinary action by the Company, up to and including termination of employment or retainer where permitted by local law.

Detour Gold has adopted a Disclosure, Confidentiality and Insider Trading Policy in order to prevent improper trading in securities of the Company and the improper communication of undisclosed material information regarding Detour Gold. Directors, officers, employees and consultants should refer to, and be fully familiar with such policy.

10. FINANCIAL REPORTS AND RECORDS

The Company maintains a high standard of accuracy and completeness in its financial records. Depending on their position with the Company, a directors, officers, employees and consultants may be called upon to provide necessary information to ensure that the Company's public reports are complete, fair and understandable. The Company expects directors, officers, employees and consultants to take this responsibility very seriously and to provide prompt accurate answers to inquiries related to the Company's public disclosure requirements.

The integrity of the Company's record keeping systems will be respected at all times. Directors, officers, employees and consultants are forbidden to use, authorize, or condone the use of "off-the-books" bookkeeping, secret accounts, unrecorded bank accounts, "slush" funds, falsified books and supporting documentation, or any other devices that could be utilized to distort records or reports of the Company's true operating results and financial conditions or could otherwise result in the improper recordation of funds or transactions.

11. NON-DISCRIMINATORY ENVIRONMENT AND SAFE WORKPLACE

Detour Gold is committed to fair employment practices and a workplace in which all individuals are treated with dignity and respect and everyone's contributions are recognized. The Company will not tolerate or condone any type of discrimination prohibited by law.

The Company complies with all applicable laws concerning discrimination and equal opportunity. Detour Gold recruits, selects, trains and compensates based on merit, experience and other work-related criteria.

You are expected to treat others with respect on the job and comply with equal employment opportunity laws, including those related to discrimination and harassment.

Harassment of any kind in the workplace is not tolerated. Harassment generally means offensive conduct that is severe and pervasive and singles out an individual to the detriment or objection of that individual because of a difference protected by law such as race, gender, sexual orientation, religion, national origin, ethnicity, citizenship, age, marital status, disability or physical handicaps. Harassment covers a wide range of conduct, from direct requests of a sexual nature to situations where offensive behaviour (e.g., insults, offensive jokes or slurs, offensive material in the workplace) results in a hostile work environment.

You are expected to do your part to ensure a safe and secure workplace in which everyone can perform their duties without fear of harassment. You must treat all people with respect and report all incidents of harassment.

In addition, you must: (i) not use any differences protected by law as a factor in hiring, firing or promotion decisions; (ii) not use any differences protected by law when determining terms or conditions of employment, such as work assignments, employee development opportunities, vacation or overtime; and (iii) not retaliate against a person who makes a complaint of discrimination and/or harassment in good faith; reports suspected unethical conduct, violations of laws, regulations, or company policies; or participates in an investigation.

Any person who believes that they have been subjected to harassment should immediately advise their supervisor or use the Whistleblower reporting line set out in the Company's Whistleblower

Policy. Reports of harassment will be promptly and thoroughly investigated in a confidential manner. Detour Gold will take immediate and appropriate action if harassment is determined to have occurred.

The Company does not condone the reporting of false or malicious claims. To the extent that the Company determines that any such claim was made with malicious intent, disciplinary action will be considered at the Company's discretion, including termination of employment, where permitted by local law.

12. ENVIRONMENTAL, SAFETY AND OCCUPATIONAL HEALTH PRACTICES

Detour Gold believes that sound environmental, safety, and occupational health management practices are in the best interests of its business, its employees, its consultants, its shareholders, and the communities in which it operates. Detour Gold is committed to conducting its business in accordance with recognized industry standards and to meeting or exceeding all applicable environmental and occupational health and safety laws and regulations. Achieving this goal is the responsibility of all directors, officers, employees and consultants.

You are expected to abide by all Company policies and procedures in the areas of environment, health and safety and to report all environmental, health and safety incidents. You are to report to work fit to perform your duties and be free of the effects of alcohol or drugs at work. Should you be faced with an environmental issue or have a concern about workplace health and safety, please contact your supervisor or use the reporting procedures set out in the Company's Whistleblower Policy.

The Company has adopted an Environmental Policy and directors, officers, employees and consultants should refer to, and be fully familiar with, the Company's Environmental Policy.

13. ACCOUNTABILITY, REPORTING AND WAIVERS

Detour Gold directors, officers, employees and consultants are expected to take all responsible steps to prevent a violation of this Code, to identify and raise potential issues as soon as they are identified, and to seek additional guidance when necessary.

If you have any questions regarding the best course of action in a particular situation, or if you suspect a possible violation of a law, regulation, or this Code, you should promptly contact your immediate supervisor or use the reporting procedures set out in the Company's Whistleblower Policy.

If the concerns relate to the conduct of the Chief Executive Officer ("**CEO**"), Chief Financial Officer ("**CFO**") or any other officer of the Company, then you should promptly report your concerns to the Chair of the Company's Corporate Governance and Nominating Committee. In the case of accounting, internal accounting controls or auditing matters, you should promptly contact the Chair of the Company's Audit Committee. The Chair of the Audit Committee will communicate these concerns to the Chair of the Company's Corporate Governance and Nominating Committee.

No employee, consultant, officer or director will be penalized for reporting in good faith possible breaches of law, regulation or Company policy. Reports of breaches or other violations will be promptly considered and, if appropriate, will be investigated. Detour Gold will not tolerate retaliatory action against any individual for raising legitimate concerns or questions in good faith

regarding ethical matters or for reporting suspected violations of this Code or of legal and/or regulatory requirements. For further details see the non-retaliation section in the Company's Whistleblower Policy.

From time to time, Detour Gold may waive certain provisions of this Code. Waivers generally may be granted only by the CEO. However, any waiver of the provisions of this Code for directors and executive officers, including the CEO and CFO, may only be made by the Chair of the Corporate Governance and Nominating Committee and will be disclosed as required by applicable rules and regulations.

14. DISSEMINATION AND ACKNOWLEDGEMENT

The Code is available on the Company's website and filed on SEDAR at www.sedar.com. All managers are responsible for ensuring that the employees and consultants under their supervision are aware of and understand the provisions of the Code. New directors, officers, employees and consultants of the Company will be given a copy of the Code upon commencing employment or service with Detour Gold, and are expected to read the Code and complete and return a form of acknowledgement and adherence to their immediate supervisor. Directors, officers and management-level employees will be required to submit acknowledgements on an annual basis and other employees and consultants may be required to submit acknowledgements from time to time. Whenever changes are made to the Code, the amended version of the Code will be made available on the Company's website and SEDAR and updated acknowledgements will be required.

Last Updated by the Board of Directors on **May 2, 2019**.