

DETOUR GOLD

WHISTLEBLOWER POLICY

1. PURPOSE

Directors, officers, employees and consultants (collectively, “**you**”) of Detour Gold Corporation and its subsidiaries (collectively, “**we**” or the “**Company**”) are required to comply with the Company’s Code of Business Conduct and Ethics (the “**Code**”).

We are committed to conducting our business with honesty and integrity, and to upholding our core values including compliance with all applicable laws, rules and regulations. Unfortunately, from time to time, it is possible that violations or deviations from these standards may occur. In such cases, we have a responsibility to properly investigate and, where appropriate, report such violations or deviations and the actions that we have taken to address them.

This Whistleblower Policy (the “**Policy**”) sets out the procedures for reporting any violations, or potential or suspected violations, of the Code. This Policy also applies to any identified violations or suspected violations of any applicable laws or regulations and any applicable accounting, auditing, and securities requirements.

The procedures set out in this Policy are required by securities regulators in Canada. This Policy has been established and approved by the Audit Committee (the “**Audit Committee**”) and approved by the Board of Directors of the Company. The Audit Committee is responsible for overseeing management’s compliance with and monitoring of this Policy.

2. REPORTING RESPONSIBILITY

It is your responsibility to report any violation or potential or suspected violation of the Code or any applicable laws or regulations or any applicable accounting, auditing, and securities requirements, in accordance with this Policy on a timely basis. This includes any suspected acts of questionable or improper accounting or overriding of internal controls. Examples of issues to be reported are set out in Schedule “A” to this Policy.

3. REPORTING PROCEDURE

You should feel free to make a report at any time you feel it is appropriate and you are encouraged to do so. An initial report can be made to your immediate supervisor, or if your immediate supervisor is involved in the subject matter of the report, to the next above supervisor. If your initial report goes unresolved, then other options are available. You can provide the report to the General Counsel and Corporate Secretary of the Company or to the Chair of the Company’s Audit Committee. You are encouraged to provide in your report as much detail as is possible regarding the actual or suspected violations.

Should you wish to remain anonymous, you may submit your report by the following means:

- (a) Through Wiklow Corporate Services Inc., the outside independent third party operating the Company's Whistleblower reporting line:

By telephone: 1-877-266-2579 (Toll free in Canada and United States); or

By Internet: www.wiklow.com
Login ID: Detour
Password: D4gold

- (b) By letter/mail/courier to the Chair of the Audit Committee addressed as follows:

Detour Gold Corporation
Commerce Court West
199 Bay Street, Suite 4100
Toronto, Ontario
M5L 1E2

STRICTLY PRIVATE AND CONFIDENTIAL
Attention: Chair of the Audit Committee

4. CONFIDENTIALITY

The Company will treat any report you make pursuant to this Policy as confidential to the fullest extent permitted by law. The Company will exercise particular care to keep your identity confidential until a formal investigation is launched. Thereafter, your identity 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, you will be so informed in advance of being identified. Where disciplinary proceedings are invoked against any individual following a report made under this Policy, the person subject to such proceedings is normally entitled to know the name of the person making complaint.

If you wish to submit an anonymous report, you may use a non-identifiable third-party email address to maintain your anonymity. It is, however, important to note that while Detour Gold will take all reasonable steps to maintain your anonymity, the source or nature of the report and steps taken to investigate it may, as a practical matter, make it difficult to maintain such anonymity.

5. HANDLING OF REPORTS

The Audit Committee will 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 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 will be dismissed and the person who made the report will be informed of the decision and the reasons for such dismissal. If it is judged that the allegation(s) or issue(s) covered in the Disclosure have merit, the matter will 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.

At a minimum, quarterly, the Audit Committee will review all Whistleblower reports, their current status or resolution, and make recommendations on follow-up actions to management, accordingly.

6. NO RETALIATION

No one who in good faith submits a report under this Policy will suffer harassment, retaliation or adverse employment consequences as a result of doing so. Any director, officer, employee or consultant of the Company who retaliates against someone who has made a report in good faith will be subject to discipline up to and including termination of their employment or consulting arrangement. This Policy is intended to encourage and enable serious concerns to be dealt with by the Company rather than seeking resolution outside the Company.

7. PROHIBITION OF MALICIOUS REPORTS

We encourage you to come forward with any concern you may have regarding violations of the Code and we are dedicated to fully investigating and following up on any reports received. You should not have any fears about raising concerns based on reasonable beliefs, even if later found to be mistaken. We also believe it is important to make sure our directors, officers, employees and consultants are protected from possible malicious or unfounded accusations. Therefore, in the course of investigating a report, if it is determined that an allegation was made in a report against another person either frivolously, falsely or maliciously (e.g., to pursue a personal grudge), then disciplinary action may result against the complainant.

8. 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. These records will be retained for a period of time required by applicable securities laws and regulations (e.g., between 2 and 7 years). Based on the nature of any other reported concerns, retention of other reports will be made based on applicable legal requirements for those types of claims.

9. POLICY REVIEW

The Audit Committee will review and evaluate this Policy at a minimum, every three years, to determine whether the Policy is effective in providing a confidential and anonymous procedure to report violations or complaints regarding accounting, internal accounting controls, auditing or other non-financial matters.

10. PUBLICATION

This Policy will be posted on the Company's website at www.detourgold.com.

In addition, the Policy will be prominently posted with other signage, both in the corporate offices and at the operations.

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

SCHEDULE 'A'

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, Harassment

Inappropriate Use of Social Media

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