

WHISTLEBLOWER POLICY

INTRODUCTION

The purpose of this Whistleblower Policy (the “Policy”) is to establish formal guidelines for the receipt, retention and treatment of reports of complaints and non compliance received by Oracle Mining Corporation and its subsidiaries (“Oracle Mining” or the “Corporation”) regarding legal, regulatory, financial statement disclosure issues, accounting, auditing matters or violations of the Corporation’s Code of Business Conduct and Ethics (the “Code”). This Policy also includes procedures for the submission by directors, officers and employees of Oracle Mining, on a confidential basis, for issues and concerns, including:

- violation of any applicable law, rule or regulation that relates to reporting and disclosure;
- violation of the Corporation’s Code of Business Conduct and Ethics;
- misrepresentation or a false statement by or to a director, officer or employee of the Oracle Mining respecting information included in the financial records, statements or reports;
- fraud or deliberate error in the preparation, evaluation, or review of financial or non-financial information of Oracle Mining;
- fraudulent or corrupt practices, including the offering or accepting bribes or otherwise gaining advantage from a relationship with the Corporation;
- coercion, harassment or discrimination by, or affecting, any member of the Corporation;
- safety, health and environment situations or issues related to Oracle Mining; and
- deficiencies or non-compliance with Oracle Mining’s corporate policies and controls.

NO ADVERSE CONSEQUENCES

Oracle Mining prohibits discrimination, harassment and/or retaliation against any director, officer or employee who:

- files reports regarding financial statement disclosure issues, accounting, auditing matters or violations of the Code; and / or
- provides information or otherwise assists in an investigation or proceeding regarding any conduct which he or she reasonably believes to be a violation of employment or labour laws; securities laws (including the rules and regulations of the B.C. Securities Commission, the securities regulatory authorities in the other provinces and territories of Canada, the Toronto Stock Exchange), laws regarding fraud or the commission or possible commission of a criminal offence.

This Policy protects any director, officer or employee of Oracle Mining who legitimately and in good faith discloses an alleged violation of the Code, provides information or otherwise assists in the investigation regarding any conduct which the director, officer or employee believes constitutes non compliance of the Code or fraud, or submits a report regarding financial statement disclosures, accounting, auditing matters or violations of the Code.

REPORTING AND INVESTIGATING ALLEGED VIOLATIONS OR COMPLAINTS

Any director, officer or employee of the Corporation who legitimately and in good faith believes that he or she may have been the subject of prohibited discrimination, harassment and/or retaliation or is aware of any conduct which may be prohibited by this Policy is strongly encouraged to report immediately the facts forming the basis of that belief or knowledge to the anonymous incident reporting hotline maintained by Oracle Mining through the External hotline service that is available 24 hours a day, seven days a week at the phone numbers, website or e-mail contact information set out at the end of this Policy.

Any director, officer or employee who witnesses any conduct which he or she legitimately and in good faith believes may be prohibited by this Policy must immediately contact the External hotline service. If a director, officer or employee would like to discuss any matter with the Audit Committee Chairman or the Corporate Secretary, he or she should communicate this request in the incident reporting and provide a telephone number for contact purposes.

This Policy shall be available in the English and Spanish languages and other languages that the Board of Directors may deem appropriate, and the External hotline service shall provide incident reporting services in English and Spanish and other languages as deemed appropriate.

The following type of incidents reported will be communicated by the External hotline service to the Audit Committee Chairman:

- accounting and auditing irregularities, including financial statement disclosure issues and internal accounting controls;
- falsification of financial or corporate records;
- fraud or violations of laws regarding fraud;
- fraudulent insurance and benefit claims;
- improper loans to Oracle Mining directors, officers or employees;
- insider trading;
- breaches of securities laws, other than insider trading and matters related to financial statement disclosure;
- violations of the Code of Business Conduct and Ethics;
- bribery, kickbacks or other non-authorized payments or receipts of funds;
- retaliation against individuals reporting incidents via the whistleblower process; and
- commission or possible commission of criminal offences.

The following type of incidents reported will be communicated by the External hotline service to the Corporate Secretary:

- conflicts of interest;
- breaches of environmental, safety, or health laws and regulations;
- breaches of employment or labour laws;
- discrimination;
- employee relations;
- policy and procedures issues;
- product and/or quality concerns;
- release of proprietary information;
- safety issues and security;
- sexual harassment;
- substance abuse;
- wage, salary and payroll issues;
- workplace violence or threats;
- theft of cash or other tangible assets; and
- theft of time, goods or services.

Directors, officers and employees are obligated to co-operate in any investigation conducted by the Audit Committee Chairman, Corporate Secretary, or other authorized individuals as required. Those individuals responsible for the investigation will maintain the confidentiality of the allegations of the complaint and the identity of the persons involved, subject to the need to conduct a full and impartial investigation and implement remediation as required.

The investigation may include, but is not be limited to, discussions with the complainant (unless the complaint was submitted on an anonymous basis), the party against whom allegations have been made, and witnesses, as appropriate. In the event that an investigation establishes that a director, officer or employee has engaged in conduct or actions constituting discrimination, harassment and/or retaliation in violation of this Policy, the Corporation will take immediate and appropriate corrective action up to and including termination.

In the event that the investigation reveals that the complaint was inappropriate, for improper motives, or made in bad faith or without a reasonable and probable basis, the individual filing the report will be subject to disciplinary actions as required.

AUDIT COMMITTEE PROCEDURES

The External hotline service shall promptly forward to the Audit Committee Chairman any reported incidents that it has received regarding the matters identified. Upon receipt of any complaints reported, the Audit Committee shall investigate each matter so reported and take corrective and disciplinary actions, if appropriate, which may include, alone or in combination, a warning or letter of reprimand, demotion, loss of merit increase, bonus or stock options, suspension without pay or termination.

The Audit Committee may enlist individuals of Oracle Mining and/or outside legal, accounting or other advisors, as appropriate, to conduct any investigation of complaints it receives. In conducting any investigation, the Audit Committee shall use reasonable efforts to protect the confidentiality and anonymity of the complainant.

The Audit Committee shall retain as a part of the records of the Audit Committee any such complaints or concerns for a period of no less than seven (7) years.

The Audit Committee will review and evaluate the Whistleblower Policy as required to determine and ensure that the Policy is effective in providing a confidential and anonymous mechanism to receive, report and track violations or complaints.

CORPORATE SECRETARY PROCEDURES

The External hotline service shall promptly forward to the Corporate Secretary any reported incidents received regarding the matters identified. Upon receipt of any complaints reported, the Corporate Secretary shall investigate each matter so reported and shall report the results of such investigation to the Audit Committee. At any time, the Corporate Secretary may forward complaints to the Audit Committee for their attention.

The Corporate Secretary may enlist employees of Oracle Mining and/or outside legal, accounting or other advisors, as appropriate, to conduct any investigation of complaints he/she receives. In conducting any investigation, the Corporate Secretary shall use reasonable efforts to protect the confidentiality and anonymity of the complainant.

The Corporate Secretary shall retain as a part of the Corporate records any such complaints or concerns for a period of no less than seven (7) years.

APPROVAL AND COMMUNICATION OF THE POLICY

The Board of Directors has approved the Whistleblower Policy as at December 23, 2011.

Current directors, officers and employees will receive a copy of the Whistleblower Policy immediately after initial publication or after any amendment. Future directors, officers and employees will receive a copy of the Policy at the time the individual is hired, or in the case of directors, upon appointment to the Board of Directors. The Policy will be posted on the Corporation's website.

Please see below for the name of the current External hotline service provider for contact information and process to be used in reporting incidents as described in this Policy.

<p style="text-align: center;">EXTERNAL HOTLINE SERVICE PROVIDER CONTACT INFORMATION</p>
--

Information can be given anonymously through the External hotline service, *WhistleBlower Security*, which allows employees, contractors and suppliers to anonymously report sensitive work related issues through the following methods:

- a) Toll-free: 1-866-921-6714;
- b) Online: at www.whistleblowersecurity.com - click on File A Report;
- c) Email: oracle@whistleblowersecurity.com;
- d) Fax: +1-604-926-5668;
- e) Mail: P.O. Box 91880 West Vancouver, British Columbia, V7V 4S4 Canada