



POLARIS MINERALS CORPORATION WHISTLEBLOWER POLICY

General

Polaris Minerals Corporation (the "Company") requires its directors, officers and employees to observe high standards of professionalism and ethical conduct in maintaining the financial records of the Company. To that end, it is the intent of the Company to ensure that a confidential and anonymous process exists whereby persons can express any concerns or complaints about the accuracy, fairness or appropriateness of any of the Company's accounting policies or financial reports. Therefore, the Company has adopted this Whistleblower Policy.

For the purposes of this Policy, all accounting, auditing or other financial matters which are the subject of a complaint or submission are referred to as an "Accounting Irregularity".

No Retaliation

No officer or employee who in good faith reports an Accounting Irregularity shall suffer harassment, retaliation or adverse employment consequence. An officer or employee who retaliates against someone who has reported an Accounting Irregularity 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.

Reporting Violations

It is the responsibility of all directors, officers and employees to report all suspected Accounting Irregularities in accordance with this Whistleblower Policy. The Company maintains an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with the Chief Executive Officer or the Chief Financial Officer. If the matter relates to the Chief Executive Officer or Chief Financial Officer, or the reporting person is otherwise uncomfortable with making a report to such person, the employee may use any of the following options to contact the Company's Audit Committee:

Option 1:

Reports may be made in writing, by mail or courier, and addressed to the Chair of the Audit Committee as follows:

PRIVATE AND CONFIDENTIAL
Audit Committee Chair
c/o Corporate Secretary
Polaris Minerals Corporation
Suite 2740, PO Box 11175
1055 West Georgia Street
Vancouver, BC V6E 3R5

Option 2:

Reports may be made by email to auditcommittee@polarmin.com. This address is accessed only by the Chair of the Audit Committee.

Option 3:

Reports may be made in writing, by mail, courier, or fax, to the Company's outside legal counsel who will refer the matter to the Chair of the Audit Committee:

Mr. Georald Ingborg
Fasken Martineau DuMoulin LLP
Suite 2900
550 Burrard Street
Vancouver, BC V6C 0A3
Fax: 604-632-3225

Investigations of Complaints

The Company's Audit Committee is responsible for investigating and resolving all reported complaints and allegations concerning Accounting Irregularities.

The Chair of the Audit Committee will notify the sender and acknowledge receipt of the reported suspected Accounting Irregularity within five business days. All complaints or submissions will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. The Chief Financial Officer, as well as all other officers of the Company as required, must fully cooperate with and assist the Committee, as requested, to investigate and resolve the matter. The Audit Committee may retain independent legal counsel, accountants or others to assist in its investigations.

Acting in Good Faith

Anyone filing a complaint concerning a suspected Accounting Irregularity must be acting in good faith and have reasonable grounds for believing the information disclosed indicates an Accounting Irregularity. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Privacy Violations

In addition to these rules regarding accounting, internal accounting controls and auditing matters, the *Personal Information Protection and Electronic Documents Act* (Canada) ("*PIPEDA*") and the *Personal Information Protection Act* (British Columbia) ("*PIPA*"), provide that any person who has reasonable grounds to believe that there has been a contravention of either of *PIPEDA* or *PIPA* may notify the relevant Privacy Commissioner.

An organization must not dismiss, suspend, discipline, harass or otherwise disadvantage an employee or deny an employee a benefit because the employee, acting in good faith and on the basis of reasonable belief, has disclosed to the Privacy Commissioner that the organization has contravened or is about to contravene either of *PIPEDA* or *PIPA*. Members of the public may lodge anonymous complaints to avoid the possibility of retaliation.