

**OREX MINERALS INC.**  
(the "Company")

**WHISTLEBLOWER POLICY**  
(July 2020)

The purpose of the Whistleblower Policy is to provide procedures for the receipt and handling of complaints received by the Company from any source, whether internal or external, regarding the questionable or illegal acts or handling and disclosure or non-disclosure of information by the Company, its Directors, Officers, employees and contractors.

The Whistleblower Policy is part of the Company's disclosure controls and procedures. It provides that all complaints are to be directed to the Company's external legal counsel for receipt, recording and handling, such handling to include the sharing of the information with the Audit Committee and others as determined necessary. It will also include the full investigation by parties who are totally independent to those identified and involved in the commission of the act or mishandling of the information questioned, and formulation of a formal response to the complainant and to the Board of Directors. All complaints will be accepted and dealt with in an equal and appropriate manner. Full confidentiality and independence will always be observed in every aspect of the handling of the complaint.

Where the complainant is an employee or contractor acting in good faith, it is the Company's stated policy that no criticism or reprisal of any sort is to be tolerated, and infractions of this policy element by more senior individuals to the complainant will result in their immediate severe discipline or termination. The Company endorses this policy fully and will not allow any intervention to inhibit its effectiveness in meeting its overall stated objectives, or its failure in ensuring complete independence and anonymity to those involved.

All complaint documents together with the results of the related investigations, discussions with the Audit Committee concerning the complaint and the formal response will be retained by the Company's counsel and the Audit Committee.

The current contact information for external legal counsel is:

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