

STRONGBOW EXPLORATION INC.
(the “Company”)

WHISTLEBLOWER POLICY

Scope of this Policy

The primary function of the Audit Committee (the “**Audit Committee**”) of the board of directors of the Company (the “**Board**”) is to assist the Board in fulfilling its financial oversight responsibilities by reviewing the financial reports and other financial information provided by the Company to regulatory authorities and shareholders, the Company's systems of internal controls regarding finance and accounting and the Company's auditing, accounting and financial reporting processes. The integrity of the financial information of the Company is of paramount importance to the Audit Committee and to the Board.

This policy outlines the procedure which the Audit Committee is establishing for the confidential, anonymous submission by employees of the Company of any concerns which employees may have regarding questionable accounting or auditing matters.

All employees are encouraged to submit all good faith concerns and complaints in respect of the accuracy and integrity of the Company's accounting, auditing and financial reporting, without fear of retaliation of any kind. If employees have any concerns about accounting, audit, internal controls or financial reporting matters which they consider to be questionable, incorrect, misleading or fraudulent, employees are urged to come forward with any such information, complaints or concerns, without regard to the position of the person or persons responsible for the subject matter of their complaint or concern.

Employees may report the matter to their supervisor or, alternatively, to the Audit Committee Chairperson.

Procedure for Reporting Concerns

Employees should describe their concern in writing and should include sufficient information to allow the Audit Committee to understand and review their concern. If employees wish to remain anonymous, their written communication should clearly indicate this wish for anonymity. All concerns should be forwarded to the Chairperson of the Audit Committee in a sealed envelope labelled as follows:

“To be opened by the Audit Committee only.”

If employees wish to discuss any matter with the Audit Committee, they should indicate this in their submission. In order to facilitate such a discussion, employees may include a telephone number at which they can be contacted. Any such envelopes received by the Company will be forwarded promptly and unopened to the Chairperson of the Audit Committee.

Handling of Concerns Raised

Promptly following the receipt of any complaints submitted to it, the Audit Committee will investigate each complaint and take appropriate corrective actions.

Investigations

The Audit Committee has the authority to:

- (a) conduct any investigation which it considers appropriate, and has direct access to the external auditor of the Company, as well as officers and employees of the Company; and
- (b) retain, at the Company's expense, special legal, accounting or such other advisors, consultants or experts it deems necessary in the performance of its duties.

In conducting any investigation, the Audit Committee shall use reasonable efforts to protect employees' anonymity.

Records

The Audit Committee will retain as part of its records, any complaints or concerns for a period of no less than seven years. The Audit Committee will keep a written record of all such reports or inquiries and make quarterly reports on any ongoing investigation which will include steps taken to satisfactorily address each complaint.

Employee Protection

All employees are assured that no retaliation of any kind is permitted against them for complaints or concerns made in good faith. No employee will be adversely affected because the employee refuses to carry out a directive which, in fact, constitutes corporate fraud, or is a violation of federal or provincial law.

Questions about this Policy

If you have any questions, contact the CEO or Chairperson of the Audit Committee.

Adopted by the Board of Directors of Strongbow Exploration Inc. on June 20, 2017.