



QUADRA FNX MINING LTD.

Whistle Blower Policy

OBJECTIVE AND SCOPE

Quadra FNX Mining Ltd's reputation and success is due largely to the integrity and competence of people who conduct the business. The Code of Conduct Business Conduct and Ethics applies to every director, officer, employee and other representative of Quadra FNX Mining Ltd. and its direct and indirect subsidiaries, collectively ("The Company"). It is against this background that Quadra FNX Mining Ltd. is committed to maintaining a workplace in which the Company can receive, retain and address concerns regarding any business conduct matters, including procurement, contracting, accounting, internal accounting controls or auditing. This policy has been established to encourage employees, officers and directors of the Company to raise such concerns on a confidential basis, anonymously or otherwise, free from recrimination, discrimination, retaliation or harassment.

METHOD OF REPORTING

The Audit Committee of the Board of Directors of Quadra FNX Mining Ltd. is responsible for administering this policy. The Company's Lead Independent Director is totally independent of management and has chosen to become involved in the administration of this policy and to receive and review submissions made under this policy. Issues and concerns may be reported confidentially in person or anonymously in any manner, including e-mail, regular mail or phone.

Submissions may be made by:

- E-mail to the whistle.blower@quadrafnx.com
- "Private and Confidential" marked mail addressed to the Company's Vancouver head office to the attention of the Lead Independent Director
- Phone to the confidential 24 hour Reporting Hotline at 1 604 689 8506

All manners of reporting systems are secure and can only be accessed by the Lead Independent Director.



CONFIDENTIALITY

A reporting director, officer or employee may disclose his or her identity, but is not required to do so. Confidentiality of the reporting person will be maintained to the fullest extent possible consistent with the need to conduct an adequate investigation. Any system established for exchanging information with a complainant shall be designed to maintain anonymity.

NON-RECRIMINATION RETALIATION

No director, officer or employee who in good faith submits a report under this policy should be concerned about possible recriminations, suffer retaliation, harassment or an adverse employment consequence as result of such submission. An employee who retaliates against a person who has reported a violation in good faith will be subject to discipline up to and including dismissal.

RECEIVING AND INVESTIGATING REPORTS

If you provide contact information the Lead Independent Director will acknowledge receipt of the reported or suspected violation within ten business days.

All complaints will be investigated promptly. The Lead Independent Director will inform the Audit Committee, in summary form or otherwise, of any complaint received. The investigation and evaluation of any complaint shall be conducted by the Lead Independent Director.

Following investigation and evaluation of a complaint, the Lead Independent Director will report to the Audit Committee and then to the Board on proposed remedial action and any disciplinary action. The action determined by the Audit Committee to be appropriate under the circumstances will then be brought to the Board of Directors of the Company or to the appropriate member(s) of senior management for authorization or implementation, respectively.

RETENTION OF REPORTS

The Lead Independent Director will retain Records of Complaints submitted under this policy, tracking their receipt, investigation and resolution, for a period of time in compliance with applicable laws and any Company document retention policies. Records of Complaints shall be retained as a separate part of the records of the Audit Committee and will be subject to safeguards that ensure their confidentiality, and, when applicable, the anonymity of the person making the submission.