



TIGER GROUP

WHISTLEBLOWER POLICY

| Version No | Date/Change | Description | Approved/Amended |
|------------|-------------------|--|----------------------|
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| Rev01 | 19 September 2014 | Tiger Group entity suffixes, logos and new SEK address | Amended: MP |

WHISTLEBLOWER POLICY

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This policy applies to:

- executive and non-executive directors;
- officers;
- full-time, part-time and casual employees; and
- contractors, suppliers, consultants, agents, representatives and advisers (**Third Parties**),

of Tiger Resources Limited and its subsidiaries, including: Société d'Exploitation de Kipoi SA (SEK SA) (**SEK**), Tiger Congo SARL, Sase Mining SARL, Balcon Holdings Ltd, Tiger Finance Ltd, Congo Minerals SARL, and any future group entities (collectively, **Tiger Group**) and any joint ventures under Tiger Group's operational control.

Tiger Group's Code of Business Conduct and Ethics (**Code**) requires directors, officers, employees and Third Parties to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. All directors, officers, employees and Third Parties of Tiger Group must practise honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

Tiger Group's internal controls and the Code are intended to prevent, deter and remedy any violation of applicable laws and regulations. However, even the best systems of control and procedures cannot provide absolute safeguards against such violations. Tiger Group recognises that an effective whistleblower programme:

- (a) is a critical component to reinforce a strong commitment to, and compliance with, relevant legal and ethical obligations;
- (b) enables individuals to feel that Tiger Group is properly addressing their concerns; and
- (c) does not penalise employees for fulfilling their obligation to ensure that Tiger Group's conduct meets its policies on compliance and ethical behaviour.

This Whistleblower Policy governs the process through which employees, and others, either in their own name or anonymously, can notify Tiger Group's Chief Operating Officer of potential violations or concerns. In addition, this Whistleblower Policy establishes a mechanism for responding to, and keeping records of, complaints from employees and others regarding such potential violations or concerns.

No director, officer or employee of Tiger Group who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequences. An employee who retaliates against someone who has reported a violation of the Code in good faith will be subject to disciplinary action 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 prior to seeking resolution of those concerns outside the Company.

Tiger Group's Chief Operating Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at his discretion, shall advise the Board.

The Chief Operating Officer shall report to the Audit Committee from time to time as required. If any person is not comfortable contacting the Chief Operating Officer on a particular matter and the matter is urgent, they should contact Tiger Group's Chairman.

It is the responsibility of all directors, officers and employees to comply with the Code and report violations or suspected violations in accordance with this Whistleblower Policy.

The following are generally the types of issues that Tiger Group encourages individuals to pursue under this Policy:

- (a) conduct or practices that are illegal or breach any law, regulation, or code of conduct applying to Tiger Group;
- (b) fraudulent or corrupt practices (including the offering or accepting of bribes or otherwise to gain advantage from a relationship with Tiger Group to which Tiger Group has not agreed);
- (c) concerns or complaints regarding corporate accounting practices, internal controls or auditing;
- (d) continuing or regular breaches of Tiger Group's policies or rules of conduct;
- (e) coercion, harassment or discrimination by, or affecting, any employee of Tiger Group;
- (f) misleading or deceptive conduct of any kind;
- (g) situations within Tiger Group's control that are a significant danger to the environment; and
- (h) Tiger Group staff behavior that could reasonably suggest that Tiger Group practices are not being followed.

The Code addresses Tiger Group's open door policy and encourages employees, and others to share their questions, concerns, suggestions or complaints with someone who can address them promptly and properly. In most cases, an employee's supervisor is in the best position to address an area of concern.

However, if the employee is not comfortable speaking with his supervisor, or he is not satisfied with his supervisor's response, the employee is encouraged to speak with anyone in management who he is comfortable in approaching. Supervisors and managers are required to report suspected violations of the Code to the Chief Operating Officer, who has specific and exclusive responsibility to investigate all reported violations.

For suspected fraud, or when an employee is not satisfied or is uncomfortable with following Tiger Group's open door policy, individuals should contact the Chief Operating Officer directly as follows:

Chief Operating Officer
SEK (SA), 8935 Avenue Tiger, Q/Kimbembe Commune Annexe,
République Démocratique du Congo
By Email: cbrown@tigercongo.com
By Telephone: +243 97 001 4107

If the complaint involves the Chief Operating Officer, a director will assess the situation and if deemed necessary will communicate the complaint to Tiger Group's legal advisers for advice. If the complaint involves the CEO, the Chairman will deal with it.

All reports of alleged violations, whether or not they were submitted anonymously, will be kept in strict confidence to the extent possible, consistent with Tiger Group's legal obligations and need to conduct an adequate investigation.

Investigation of Complaints

Upon receipt of a complaint alleging a violation, the Chief Operating Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days.

All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Tiger Group may, in its reasonable discretion, determine not to commence an investigation if a complaint contains only unspecified or broad allegations of wrongdoing without appropriate factual support. Reports of alleged violations should be factual, rather than speculative or conclusory, and should contain as much specific detail as possible to allow for proper assessment.

The complaint should be candid and should set out all of the information that the employee knows regarding the allegation or concern. In addition, the complaint should contain sufficient corroborating information to support the commencement of an investigation.

The Chief Operating Officer will have the authority to obtain assistance from Tiger Group's management or to retain separate outside legal or accounting expertise, as deemed necessary or desirable, in order to conduct the investigation.

Corrective Action

The Chief Operating Officer is ultimately responsible for determining the validity of each complaint and fashioning appropriate corrective action, with the input of external advisers and Tiger Group's management, if required.

The Chief Operating Officer shall report any legal or regulatory non-compliance to Tiger Group's management and ensure that management takes corrective action including, where appropriate, reporting any violation to relevant governmental authorities.

Any director, officer or employee deemed to have violated any law, rule or regulation, or any internal policy regarding accounting standards and disclosures, internal accounting controls, or matters related to the internal or external audit of Tiger Group's financial statements, may be subject to disciplinary action, up to and including termination of employment.

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

The Chief Operating Officer will retain all documents and records regarding any complaint.

It is illegal and against Tiger Group's policy to destroy any records that may be subject to or related to an investigation by Tiger Group or any federal, state or regulatory body.

All employees must follow the procedures outlined in this Whistleblower Policy and co-operate with any investigation initiated pursuant to this policy. Adherence to this policy is a condition of employment. Tiger Group must have the ability to investigate and remedy any alleged violation or employee concerns, and each employee must ensure that Tiger Group has that ability.

This policy does not constitute a contractual commitment of Tiger Group with any person, nor does it prevent, limit or delay Tiger Group from taking disciplinary action against any individual, up to and including termination of employment, in circumstances (such as, but not limited to, those involving problems of performance, conduct, attitude or demeanour) where Tiger Group deems disciplinary action appropriate.

Tiger Group's Chief Operating Officer will monitor compliance with this Whistleblower Policy periodically by liaising with the Board, management and staff especially in relation to any areas of difficulty which arise from this policy and any other ideas or suggestions for improvement of the Code. Suggestions for improvements or amendments are welcome and can be made at any time by providing a written note to the Chief Operating Officer.