

LAKE SHORE GOLD CORP.
(the "Company")

WHISTLEBLOWER POLICY (AUDIT)

**Procedures for the Submission of Complaints or Concerns Regarding
Accounting, Internal Accounting Controls, or Auditing Matters**

In accordance with Canadian securities regulatory requirements and the rules of the US Securities and Exchange Commission, the Audit Committee (the "Committee") has established the following procedures for:

- a. the receipt, retention and treatment of complaints regarding accounting, internal accounting controls, or auditing matters, including concerns regarding questionable accounting or auditing matters (collectively, "Accounting Matters"), and
- b. the confidential, anonymous submission by employees and consultants (hereafter "Employees") of the Company of concerns regarding Accounting Matters.

SUBMISSION OF COMPLAINTS

Any person, including Employees, may submit a concern or complaint regarding Accounting Matters to the management of the Company without fear of dismissal or retaliation of any kind. The Company will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee (or take equivalent action against any consultant) in the terms and conditions of employment based upon any lawful actions of an Employee with respect to good faith reporting of concerns or complaints regarding Accounting Matters.

Any person, including Employees, may forward concerns or complaints regarding Accounting Matters on a **confidential or anonymous** basis as follows:

- a. by a secure web form - a customized message interface available at <https://secure.whistleblowersecurity.com/wbuser/> allows you to submit a Complaint to the Audit Committee through either communication method and completely protects your identity; or
- b. in writing - the person submitting a complaint or a concern should include a telephone number in the submission at which he or she may be contacted if the person requests contact or if the Audit Committee determines that contact is appropriate. Where the person submitting a concern or complaint wishes to remain anonymous, then a telephone number is not required, however, it may be difficult to adequately investigate the concern or complaint if additional information is required.

SCOPE OF MATTERS COVERED BY THESE PROCEDURES

These procedures relate to concerns or complaints relating to any questionable Accounting matters including, without limitation, the following:

- a. fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;

- b. fraud or deliberate error in the recording and maintaining of financial records of the Company;
- c. deficiencies in or noncompliance with the Company's internal controls over financial reporting;
- d. misrepresentation or false statement to or by a senior officer, accountant or external auditor regarding a matter contained in the financial records, financial reports or audit reports of the Company; or
- e. deviation from full and fair reporting of the Company's financial condition.

TREATMENT OF COMPLAINTS

Upon receipt of a concern or complaint, the Chair of the Audit Committee will:

- a. determine whether the concern or complaint actually pertains to Accounting Matters; and
- b. when possible, acknowledge receipt of the concern or complaint to the submitter.

Concerns or complaints relating to Accounting Matters will be reviewed under Audit Committee direction and oversight by such persons as the Audit Committee determines to be appropriate. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review.

Prompt and appropriate corrective action will be taken when and as warranted in the judgement of the Audit Committee. When possible and when determined appropriate by the Audit Committee, notice of any corrective action taken will be given to the person who submitted the concern or complaint.

REPORTING AND RETENTION OF COMPLAINTS AND INVESTIGATIONS

The Chair of the Audit Committee will maintain a log of all concerns or complaints, tracking their receipt and treatment and shall prepare a periodic summary report thereof for the Audit Committee.

DATE OF MOST RECENT BOARD CONSIDERATION

This Policy was reviewed and approved by the Board in August 2009.

LAKE SHORE GOLD CORP.
(the "Company")

WHISTLEBLOWER POLICY (SAFETY)

**Procedures for the Submission of Complaints or Concerns Regarding
Health, Safety, Environmental and Community Matters**

The Health, Safety, Environment and Community Committee (the "Committee") has established the following procedures for:

- a. the receipt, retention and treatment of complaints regarding health, safety, environmental and community matters (collectively, "Environmental and Safety Matters"), and
- b. the confidential, anonymous submission by employees and consultants (hereafter "Employees") of the Company of concerns regarding Environmental and Safety Matters.

SUBMISSION OF COMPLAINTS

Any person, including Employees, may submit a concern or complaint regarding Environmental and Safety Matters to the management of the Company without fear of dismissal or retaliation of any kind. The Company will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee (or take equivalent action against any consultant) in the terms and conditions of employment based upon any lawful actions of an Employee with respect to good faith reporting of concerns or complaints regarding Environmental and Safety Matters.

Any person, including Employees, may forward concerns or complaints regarding Environmental and Safety Matters on a **confidential or anonymous** basis as follows:

- a. by a secure web form - a customized message interface available at <https://secure.whistleblowersecurity.com/wbuser/> allows you to submit a Complaint to the Committee through either communication method and completely protects your identity; or
- b. in writing - the person submitting a complaint or a concern should include a telephone number in the submission at which he or she may be contacted if the person requests contact or if the Committee determines that contact is appropriate. Where the person submitting a concern or complaint wishes to remain anonymous, then a telephone number is not required, however, it may be difficult to adequately investigate the concern or complaint if additional information is required.

SCOPE OF MATTERS COVERED BY THESE PROCEDURES

These procedures relate to concerns or complaints relating to any questionable Environmental and Safety Matters including, without limitation, the following:

- a. fraud or deliberate error in the preparation, evaluation or review of any statement of the Company regarding an Environmental or Safety Matter;

- b. fraud or deliberate error in the recording and maintaining of records of the Company in respect to Environmental or Safety Matters; or
- c. deficiencies in or noncompliance with the Company's obligations in respect to Environmental and Safety Matters.

TREATMENT OF COMPLAINTS

Upon receipt of a concern or complaint, the Chair of the Environment and Safety Committee will:

- a. determine whether the concern or complaint actually pertains to Environmental and Safety Matters; and
- b. when possible, acknowledge receipt of the concern or complaint to the submitter.

Concerns or complaints relating to Environmental and Safety Matters will be reviewed under Committee direction and oversight by such persons as the Committee determines to be appropriate. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review.

Prompt and appropriate corrective action will be taken when and as warranted in the judgement of the Committee. When possible and when determined appropriate by the Committee, notice of any corrective action taken will be given to the person who submitted the concern or complaint.

REPORTING AND RETENTION OF COMPLAINTS AND INVESTIGATIONS

The Chair of the Committee will maintain a log of all concerns or complaints, tracking their receipt and treatment and shall prepare a periodic summary report thereof for the Committee.

DATE OF MOST RECENT BOARD CONSIDERATION

This Policy was reviewed and approved by the Board in August 2009.