



GENERAL MOLY

WHISTLEBLOWER POLICY

(Revised June 16, 2011)

Purpose of this Policy

General Moly, Inc. (including any of its consolidated subsidiaries and affiliates, the “Company”) is committed to fostering a workplace conducive to open communication regarding the Company’s business practices and to protecting employees of the Company from unlawful retaliation and discrimination for their having properly disclosed or reported illegal or unethical conduct. In an effort to further this commitment, consistent with the rules of the NYSE Amex LLC and the rules and regulations of the Securities and Exchange Commission promulgated pursuant to the Sarbanes-Oxley Act of 2002 and the Dodd–Frank Wall Street Reform and Consumer Protection Act of 2010, this Whistleblower Policy (this “Policy”): (1) establishes guidance for the receipt, retention, and treatment of complaints received by the Company regarding accounting, internal accounting controls and auditing matters, whether submitted by Company employees or third parties (collectively, “Reports”); (2) establishes guidance for providing Company employees a means to make Reports in a confidential and anonymous manner; and (3) makes clear retaliatory behavior against employees filing Reports is strictly prohibited.

Taking action to prevent problems is part of the Company’s culture. If you observe possible unethical or illegal conduct, you are encouraged to report to the Company your concerns. Employees and others involved with the Company are urged to come forward with any such information, without regard to the identity or position of the suspected offender.

Dissemination of this Policy

This Policy will be provided to each of the Company’s employees.

Procedures for Reports

Making Reports under this Policy

Any Company employee who wishes to make a Report may do so via the Company’s existing chain of communication (e.g. to such employee’s supervisor) and/or to Chair of the Audit Committee, the Legal Department or the General Counsel (as appropriate). Alternatively, employees and other persons who wish to make a Report may do so anonymously via the Company’s AlertLine system either via internet or phone (24 hours a day, 7 days a week). The AlertLine is managed by an outside, independent service provider and allows any Company employee or other person to make a Report without divulging his or her name. The AlertLine service provider is required to promptly share the information provided in the Report with our Legal Department and the Audit Committee of the Board of Directors of the Company if the Report raises ethical or legal concerns.

To file a Report via the internet go to <https://generalmoly.alertline.com>
To file a Report via phone dial 877-874-8416 (toll free)

Treatment of Reports

All Reports will be taken seriously and addressed promptly, discreetly and professionally. Upon receipt of a Report, the Chair of the Audit Committee, the Legal Department and the General Counsel (as appropriate) will review such Report. One or more members of the Audit Committee or the General Counsel may be delegated authority to investigate the complaint. The Audit Committee may also use an independent third party to assist in or conduct any investigation. In conducting any such investigation, the confidentiality of any party making a Report on a confidential basis will be maintained, to the fullest extent permitted by applicable law. The Audit Committee will convene as appropriate to review and discuss Reports, results of investigations, and any impact on the Company's financial statements and public reports. Upon review of any Report, and the completion of any investigation conducted with respect to a Report, the Audit Committee will determine the action required.

Periodic Review of Status

A summary of all Reports received under this Policy and the status of pending Reports and investigations will be reviewed at each regularly scheduled Audit Committee meeting.

Records

The proceedings of the Audit Committee and any investigation with respect to any Report will be documented. All Reports and any related documentation will be maintained for an appropriate period in accordance with legal requirements. Discussions and documentation regarding Reports will be kept in strict confidence to the extent appropriate or permitted by law.

Retaliation Against Whistleblowers Prohibited

Retaliation, reprisal, threats, coercion or intimidation against any employee that files a Report or voices a concern under this policy is strictly prohibited and will not be tolerated. Neither the Company nor any officer, employee, contractor, subcontractor or agent may discharge, demote, suspend, threaten, harass, or in any other manner discriminate against an employee who, in good faith, makes a Report or otherwise assists the Audit Committee, management or any other person or group, including any governmental, regulatory or law enforcement body, in investigating a Report.

Employees determined to have engaged in such retaliatory behavior or who fail to maintain an employee's anonymity if requested may be subject to discipline, which could include termination of employment. Any employee who feels that he or she has been subjected to any such behavior should immediately report such behavior to his or her supervisor or the Chair of the Audit Committee or the General Counsel.

EMPLOYEE ACKNOWLEDGMENT FORM

I acknowledge that I received a copy of the General Moly, Inc. Whistleblower Policy on the date shown below and that I understand my obligation as a General Moly, Inc. employee to read and obtain a thorough understanding of the policies, procedures and my rights included in the Whistleblower Policy.

DATE

EMPLOYEE

NOTE TO EMPLOYEE: Please detach this Employee Acknowledgment Form and return the original to the Lakewood Office, attention Human Resources, for filing in your personnel file as a record of your receipt of the Whistleblower Policy.