

ORLA MINING LTD.

CORPORATE SOCIAL RESPONSIBILITY POLICY

Orla Mining Ltd. (the "Company or "Orla") is committed to conducting the Company's business in a responsible manner at all times, which means respecting the health and safety of Orla's employees, protecting the environment, respecting the human rights of Orla's employees and the residents in the communities in which the Company operates, and contributing to the sustainable development of those communities.

To meet these commitments, Orla will provide its employees with the necessary resources to:

- (a) develop meaningful and effective strategies for engaging with all stakeholders;
- (b) consult with local communities to identify effective and culturally appropriate development goals;
- (c) establish grievance mechanisms, based on international best practices;
- (d) partner with credible organizations, including non-governmental organizations and local community groups;
- (e) identify and develop socio-economic opportunities that lead to sustainable prosperity in the communities and countries in which Orla operates;
- (f) integrate socio-economic, environmental, occupational health and safety, human rights, indigenous people rights and governance best practices into Orla's business processes;
- (g) make meaningful and sustainable contributions to host countries and local communities where Orla operates ;and
- (h) disclose verified information through the Company's reporting mechanisms and industry-recognized frameworks with respect to Environmental, Social, and Governance (ESG) matters.

In alignment with the Company's *Code of Business Conduct and Ethics* and its *Environmental*, *Sustainability*, *Health and Safety Policy*, Orla is committed to ensuring that all matters of corporate social responsibility are considered and supported throughout the Company's operations. By conducting the Company's operations in a socially responsible manner, Orla adds value to its business by attracting and retaining top talent, earning the trust of key stakeholders, effectively managing risk, and ensuring Orla's long-term competitiveness and sustainability.

ADOPTED AND APPROVED BY THE BOARD ON DECEMBER 6, 2016.

AMENDED AND APPROVED BY THE CORPORATE GOVERNANCE & NOMINATING COMMITTEE AND THE BOARD ON NOVEMBER 12, 2020.

FURTHER AMENDED AND APPROVED BY THE CORPORATE GOVERNANCE & NOMINATING COMMITTEE AND THE BOARD ON NOVEMBER 13, 2023.