



ORLA MINING LTD.

ENVIRONMENTAL, SUSTAINABILITY, HEALTH & SAFETY POLICY (the “Policy”)

As an exploration and mining company, Orla Mining Ltd. (the “**Company**” or “**Orla**”) is committed to meeting or surpassing regulatory requirements in all of its exploration and development activities while working to protect the environment both within and beyond the Company’s operational boundaries.

Orla will conduct all of its operations in a manner that ensures full compliance with this Policy and applicable legislation and government requirements. The Company’s practices are designed to protect its employees and the surroundings in which it operates, to minimize and manage risk and to enhance sustainable practices. We will strive for continuous improvement and hold ourselves accountable through the development of a framework and transparent reporting of our performance.

The Company will ensure that all of its activities are conducted in a sustainable manner and will ensure that its contractors adhere to the same high environmental standards.

Additionally, the Company is committed to developing and operating its projects with a focus on maintaining the health and safety of our employees, contractors and neighbors. We foster and maintain a positive safety culture, including safe behavior and awareness programs, and creating a workplace that is free from harassment and violence. We commit to provide visible and felt safety leadership and appropriate safety training.

In particular, the Company will:

Environment

- (a) identify and monitor, on an ongoing basis, all significant environmental aspects of its activities and establish appropriate objectives and strategies to manage them;
- (b) conduct all activities in compliance with the highest applicable legal requirement and endeavour to meet or surpass industry best practices and environmental norms applicable to its activities;
- (c) allocate sufficient resources to meet Orla’s environmental objectives including ensuring an effective closure strategy is in place at all stages of project development and that concurrent reclamation is undertaken as early as possible;
- (d) use best practices to prevent pollution, minimize sanitary and security risks, and optimize garbage management procedures to reduce waste, reuse materials, and promote recycling;
- (e) ensure that those subject to this Policy understand their roles and responsibilities under this Policy, and encourage them to contribute to the management of environmental issues;
- (f) have a high level of preparedness to react to environmental accidents in order to contain, control, clean up, and eliminate negative environmental effects;

- (g) have the utmost respect for the local cultures, values, and traditions and adopt an open communication policy regarding Orla's activities with all impacted parties in order to achieve transparency in the Company's socio environmental performance.

Health & Safety

- (h) be responsible for maintaining a safe and healthy workplace by following health and safety rules and practices and reporting accidents, injuries and unsafe equipment, practices and results of investigations to the proper committee(s);
- (i) provide training to pursue an injury-free workplace and to take appropriate actions during emergency situations in the facilities;
- (j) ensure that violence and harassment in the workplace are specifically prohibited. Orla employees who are victims of, or become aware of, violence or harassment in the workplace are required to report such incidents;
- (k) ensure a safe work environment for its employees by reducing the risk of incidents in the workplace in which drugs or alcohol are a contributing factor, and deterring the use of alcohol, drugs and other substances where such use could negatively affect work performance and safety. Orla expects that all employees will be free of alcohol and drugs which could impair their judgment or affect their ability to perform their job safely while in the workplace. The use, possession, distribution or offering for sale of illicit drugs, drug paraphernalia or unprescribed drugs for which a prescription is legally required will not be tolerated in the workplace.
- (l) establish appropriate systems, standards, and procedures for health and safety management, reporting and compliance with applicable laws, rules, and standards of corporate conduct;

Sustainability

- (m) comply with the requirements or any applicable treaties, laws, regulatory measures and governmental policies; and
- (n) contribute to the social, cultural and economic development of communities in which we operate.

This Policy applies to, and is the responsibility of all Company directors, officers, employees, contractors, sub-contractors, consultants, suppliers, employees of parties listed in this paragraph, and any third party contracted and/or associated with the Company's operations. All such individuals shall conduct their activities in a manner that minimizes environmental and health and safety risks, and promotes both environmental, sustainable development, and health and safety stewardship.

ADOPTED AND APPROVED by the Board of Directors (the "Board") of the Company on December 6, 2016.

AMENDED AND APPROVED by the Environmental, Sustainability, Health & Safety Committee and by the Board on August 23, 2018.

FURTHER AMENDED AND APPROVED by the Environmental, Sustainability, Health & Safety Committee and by the Board on August 10, 2020.