

CLIMATE CHANGE POLICY (the “Policy”)

1. PURPOSE

Orla Mining Ltd. (the “**Company**”) and its subsidiaries recognize that climate change is a major global challenge that could have significant impacts on operations, host communities, the resources used in production, the economy and society in general.

Climate change is a systemic risk with the potential to affect the Company’s mine infrastructure and operations; the regulatory frameworks under which it operates; and the demand for the minerals it produces. It is an increasingly important issue for the Company’s stakeholders, including investors who are seeking to understand the impact of climate change across their portfolios.

The Company recognizes the current climate change science, supports the goals of the Paris Agreement and the recommendations of the Task Force on Climate-related Financial Disclosures (“**TCFD**”). The Company believes that the mining sector has a key role to play in reducing global greenhouse gas (“**GHG**”) emissions, as well as in supporting the transition to a lower carbon economy by supplying critical minerals and metals to advance low emission technologies and solutions.

The purpose of this Policy is to reaffirm the Company’s commitment to including the risks and opportunities of climate change on its business activities, integrating climate change factors into the Company’s long-term strategic planning and risk management, and developing short-term tactical climate change action plans.

This Policy should be reviewed in conjunction with the Company’s existing codes and policies. These include, but are not limited to, the following:

- Code of Business Conduct & Ethics
- Environment & Sustainability, Health & Safety Policy
- Corporate Social Responsibility Policy

2. CLIMATE CHANGE COMMITMENT AND EXPECTATIONS

In furtherance to the Company’s commitment to climate action, the Company will:

- Integrate consideration of climate-related risks and opportunities into its strategic planning processes.
- Adapt to the potential physical impacts of climate change and increase the resilience of its operations and projects.
- Reduce GHG emissions by promoting resource efficiency and increasing the use of renewable energy sources.
- Establish partnerships—in particular, with local communities and Indigenous peoples—in the regions in which we operate to help increase the resilience of their

communities and local ecosystems to the potential physical impacts of climate change.

- Continuously improve the performance of our governance and climate change action plans based on climate change science, regulatory and voluntary frameworks and international standards.
- Provide timely and transparent disclosure on climate-related risks and opportunities.
- Establish measurable objectives and, where appropriate, targets for improved environmental performance and resource utilization, including periodically reviewing the continuing relevance of these objectives; where appropriate, targets should be consistent with relevant national policies and international environmental commitments.

In support of these commitments, the Company expects all directors, officers and employees to:

- Proactively assess options to increase the Company's use of renewable energy sources and low carbon emission technologies to reduce GHG emissions intensity in current and future operations, while also considering the strategic and controlled use of carbon offsets to complement our climate change action plans.
- Create an operating environment that incentivizes the adoption of efficient and innovative behaviors and solutions for the rational use of energy and resources.
- Build the capacity of employees who have direct responsibility for climate-related actions, including activities that can improve climate change awareness, effective decision making, energy efficiency and ultimately reduction of GHG emissions.
- Participate actively in the Company's climate change governance framework to advance the overall success of our approach.
- Work with the communities where the Company operates to develop response actions to manage physical risks of climate change and increase the resilience of the areas directly influenced by the Company's operations.

3. CLIMATE CHANGE GOVERNANCE

The Company's climate change governance is supported by a robust framework that incorporates climate change factors into its decision-making, including Board oversight and senior management accountability. Therefore, the Company is committed to:

- Ensuring that the *Environmental, Sustainability, Health & Safety Committee* of Board of Directors (the "**Committee**") upholds responsibility for oversight of climate change factors.
- Designating the Chief Sustainability Officer as accountable for identifying, assessing, managing and reporting on climate change factors to senior management and the Board of Directors on a regular basis.

4. CLIMATE CHANGE REPORTING AND DISCLOSURE

The Company will continue to align its approach to climate change factors and climate-related disclosure with TCFD recommendations, as well as evolving industry practice, enhancing alignment over time. We will strive to improve continuously our disclosure of decision-useful climate-related information over time.

5. ADMINISTRATION

The Committee is responsible for governance over the commitments made in this Policy. The Committee shall review this Policy on an annual basis to ensure it remains relevant and meets changing expectations.

Directors, officers and employees of the Company are required to acknowledge that they have read this Policy annually.

If you have questions about the interpretation of this Policy, please contact the Chief Sustainability Officer of the Company.

6. APPROVAL

ADOPTED AND APPROVED BY THE ENVIRONMENTAL, SUSTAINABILITY, HEALTH & SAFETY COMMITTEE AND THE BOARD OF DIRECTORS OF ORLA MINING LTD. – AUGUST 3, 2023.