

INDIGENOUS PEOPLES POLICY (the “Policy”)

1. PURPOSE

Orla Mining Ltd. (the “**Company**”) recognizes that it operates within the traditional territories and along-side the communities of a diversity of Indigenous peoples. The Company recognizes the importance of reconciliation between Indigenous peoples and broader society. The Company is committed to building positive and sustainable relationships with Indigenous peoples, based on trust and respect, and focused on finding common goals through open dialogue. The Company also recognizes the importance of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and the International Labour Organization Convention 169.

2. COMPANY COMMITMENT

The Company will work in partnership with Indigenous peoples, including through their community government structures, to establish a mutually beneficial, cooperative and productive relationship. The Company’s approach will be characterized by effective two-way communication, consultation and partnering. The Company’s commitment will include the following:

- Improving the understanding of each other's concerns and aspirations through meaningful consultation and cooperation with Indigenous communities, namely by:
 - seeking to engage with, share information, and undertake other appropriate steps to consult with Indigenous communities on potential impacts, appropriate accommodation measures, and opportunities for mutual benefit arising from our activities, including consultation during social and environmental impact assessment of new projects and following regulations and procedures according to the jurisdiction where the Company operates;
 - sharing information on the Company’s business imperatives and constraints to help Indigenous communities and business partners understand the reasoning behind business decisions;
 - providing potentially impacted Indigenous communities with the opportunity to reach agreements with the Company on new projects where appropriate; and
 - conducting proper engagement and due diligence on individual and collective rights, vulnerabilities and potential impacts of the Company’s activities, in accordance with industry best practices and applicable laws and regulations.
- Defining capacity-building strategies with and for Indigenous peoples in the development of the Company’s operations and projects, including in regard to employment, education, training and business initiatives. These strategies will aim to:
 - increase the number of Indigenous employees within the Company and the Company’s goods and services providers;
 - develop partnerships with Indigenous peoples, government and community organizations in the delivery of Indigenous employment and training; and

- promote the development of Indigenous business opportunities to service the Company's projects and operations needs by assisting Indigenous peoples in identifying these business development opportunities and if appropriate, by working towards the development and implementation of partnerships.
- Working to consider, understand, and incorporate Indigenous knowledge and culture in our operations by:
 - managing the impact of our projects and operations on the long-term sustainability of Indigenous peoples' cultures;
 - considering existing and historic use of the land by Indigenous peoples, and archaeological information, at the project planning stage;
 - developing and implementing appropriate Indigenous culture awareness courses to foster awareness and understanding among our workforce; and
 - providing a working environment that respects Indigenous peoples, is culturally sensitive, and is supportive for all employees.

3. APPLICATION

This Policy applies to, and is the responsibility of all Company directors, officers and employees, contractors, and relevant business partners at each of the Company's sites. All such individuals shall conduct their activities in a manner that is consistent with this Policy. The Company will work with its contractors, sub-contractors, consultants, suppliers and any other third party contracted and/or associated with the Company's operations to support consistency with this policy.

4. ADMINISTRATION

The Environmental, Sustainability, Health and Safety Committee of the Company (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, offices and employees of the Company are required to acknowledge that they have read this Policy upon hire and annually.

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

5. APPROVAL

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