

## **CLIMATE CHANGE POLICY** (the “Policy”)

### **1. PURPOSE**

Orla Mining Ltd. (the “Company”) and its subsidiaries acknowledge 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.

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, Health & Safety Policy
- Social Responsibility Policy

### **2. APPLICATION**

This Policy applies to all directors, officers, employees, contractors, consultants and third parties acting on behalf of the Company.

### **3. 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 impacts of climate change and increase the resilience of its operations and projects.
- Minimize GHG emissions by promoting resource efficiency and 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 impacts of climate change.
- Continuously improve our climate change actions based on climate change science, regulatory and voluntary frameworks and international standards.
- Provide timely and transparent disclosure on climate-related risks and opportunities.

- Establish meaningful climate related objectives, consistent with industry best practice, national and international policies and 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, in current and future operations.
- 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.
- Participate actively in the Company's climate change governance framework to advance the overall success of our approach.
- Work collaboratively with the communities where the Company operates to develop actions to increase community resilience and responsiveness to climate change risks.

#### **4. 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, specifically:

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

#### **5. CLIMATE CHANGE REPORTING AND DISCLOSURE**

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

#### **6. 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.

**7. APPROVAL**

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

**AMENDED AND APPROVED BY THE ENVIRONMENTAL, SUSTAINABILITY, HEALTH & SAFETY COMMITTEE AND THE BOARD OF DIRECTORS OF ORLA MINING LTD. – NOVEMBER 11, 2025.**