ENVIRONMENT, HEALTH & SAFETY POLICY
(the "**Policy**")

1. PURPOSE

As a mining company, Orla Mining Ltd. (the "**Company**" or "**Orla**") is committed to protecting people and the environment. 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, contractors, and the surrounding environment in which it operates, to minimize and manage risk and to enhance sustainable practices. We will strive for continuous improvement, hold ourselves accountable through our practices and be transparent in the reporting of our performance.

2. APPLICATION

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.

3. POLICY

The Company is committed to conducting all of its activities in a safe and sustainable manner and will work with its employees, suppliers, contractors and service providers, to ensure they adhere to the same high environmental and health and safety standards.

We will foster and maintain a positive safety culture, including safe behavior and awareness programs, and create 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 requirements 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 progressive reclamation is undertaken as early as possible;

(d) we will mitigate impacts, efficiently use freshwater, prevent pollution, minimize waste generation, reuse and recycle materials;

(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 adverse environmental effects;

(g) wherever possible, contribute to environmental stewardship and climate adaptation initiatives and programs where we operate;

Health & Safety

(h) foster a culture that promotes a safe and healthy workplace;

(i) establish appropriate systems, standards, and procedures for health and safety management, reporting and compliance with applicable laws, rules, and standards of corporate conduct;

(j) ensure the workforce is fit for work;

(k) prohibit abusive behaviors and ensure mechanisms are in place to eliminate violence and harassment in the workplace

(l) provide competency training to pursue an injury-free workplace and to take appropriate actions during emergency situations; and

(m) provide leadership and resources to ensure the effectiveness and sustainability of the health and safety programs.

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.

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.

FURTHER AMENDED AND APPROVED BY THE ENVIRONMENTAL, SUSTAINABILITY, HEALTH & SAFETY COMMITTEE AND BY THE BOARD ON NOVEMBER 11, 2025.