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 respecting Indigenous rights, building respectful and trust-based relationships with Indigenous Peoples, and 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, through their government structures, to establish mutually beneficial, cooperative and productive relationships. The Company's approach will be characterized by transparency, effective two-way communication and partnerships. The Company's commitment will include the following:

- Improving the understanding of each other's concerns and aspirations through meaningful engagement and cooperation with Indigenous communities, namely by:
    - conducting culturally appropriate engagement and due diligence on individual and collective rights, vulnerabilities and potential impacts of the Company's activities, in accordance with applicable laws, regulations and industry best practices;
    - engaging with Indigenous communities on potential impacts, appropriate mitigation measures, and opportunities for mutual benefit arising from our activities, including during social and environmental impact assessment of new projects and following regulations and procedures according to the jurisdiction where the Company operates;
    - transparently sharing information on the business imperatives and constraints behind the Company's business decisions, and working to understand Indigenous communities and business partners' imperatives, constraints, concerns and interests; and
    - seeking to reach agreements with impacted Indigenous communities on new projects where appropriate.
- Defining capacity-building strategies with Indigenous Peoples in the development of the Company's projects and operations, including in regards to employment, education, training and business opportunities. These strategies will aim to:
    - create opportunities for meaningful employment within the Company and the Company's services providers;
    - develop partnerships with Indigenous Peoples, government and community organizations in the delivery of training; and

- promote the development of Indigenous business opportunities to service the Company's projects and operations' needs by facilitating the identification of such opportunities and if appropriate, by working towards the development and implementation of partnerships.

- Working to understand, consider 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, starting at the project planning stage;

  - developing and implementing appropriate Indigenous cultural awareness training to foster awareness and understanding among our workforce; and

  - providing an inclusive 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.

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