SOCIAL RESPONSIBILITY POLICY
(the "**Policy**")

1. PURPOSE

Orla Mining Ltd. (the "**Company** or "**Orla**") is committed to conducting the Company's business in a responsible manner at all times, which means respecting the health and safety of Orla's employees, protecting the environment, respecting the human rights of Orla's employees and the residents in the communities in which the Company operates, and contributing to the sustainable development of those communities. This Policy sets out the Company's commitment to meeting these goals.

2. APPLICATION

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

3. POLICY

To meet the commitments of this Policy, Orla will provide its employees with the necessary resources to:

(a) have the utmost respect for local cultures, values, and traditions and comply with the requirements or any applicable treaties, laws, regulatory measures and governmental policies;

(b) transparently and meaningfully engage with stakeholders and rightsholders about Orla's activities and the Company's performance;

(c) establish rights-based feedback mechanisms to identify and address concerns and aspirations;

(d) consult with local communities and Indigenous Peoples to identify effective and culturally-appropriate opportunities to contribute to social, cultural and economic development and support sustainable prosperity in the communities and regions in which Orla operates;

(e) partner with credible organizations, including non-governmental organizations and local community groups to implement projects and programs to address community challenges and enhance community resilience;

(f) integrate socio-economic, environmental, occupational health and safety, human rights, Indigenous rights and governance best practices into Orla's business processes; and

(g) disclose verified information through the Company´s reporting mechanisms and industry-recognized frameworks with respect to Environmental, Social, and Governance (ESG) matters.

In alignment with the Company's *Code of Business Conduct and Ethics* and its *Environment, Health and Safety Policy*, Orla is committed to ensuring that all matters of social responsibility are considered and supported throughout the Company's operations. By conducting the Company's operations in a socially responsible manner, Orla adds value to its business by attracting and retaining top talent, earning the trust of key stakeholders and rightsholders, effectively managing risk, and ensuring Orla's long-term competitiveness and sustainability.

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.

All directors, officers, employees, contractors and relevant business partners at every site we operate are required to acknowledge that they have read this Policy upon hiring 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 BOARD ON DECEMBER 6, 2016.

AMENDED AND APPROVED BY THE CORPORATE GOVERNANCE & NOMINATING COMMITTEE AND THE BOARD ON NOVEMBER 12, 2020.

FURTHER AMENDED AND APPROVED BY THE CORPORATE GOVERNANCE & NOMINATING COMMITTEE AND THE BOARD ON NOVEMBER 13, 2023.

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