WORKPLACE BULLYING, HARASSMENT, AND VIOLENCE POLICY
REPORTING/INVESTIGATION PROCEDURES
(the "Reporting/Investigation Procedures")

INTRODUCTION

Orla Mining Ltd. (the "**Company**") is committed to creating and maintaining a workplace environment which fosters mutual respect, integrity and professional conduct. In keeping with this commitment, the Company has established a *Workplace Bullying, Harassment, and Violence Policy Statement* (the "**Policy**") and these related Reporting/Investigation Procedures for all employees relating to the issue of workplace bullying, harassment, and violence.

If you believe you are experiencing bullying/harassment or violent behavior, it is important to understand your options and seek resolution to your concerns. The following procedures will describe available avenues for you related to bullying/harassment and violence. Employees are encouraged to review their options and pursue the course of action which they consider the most appropriate and/or which they believe will be the most effective in their circumstances. In reviewing your options, it should be noted that avenues other than those detailed below may apply and be available to you.

To assist with dialogue and clarification of the facts in each situation, employees are encouraged to document the details regarding unwanted behavior. As soon as possible, make a record of the details of each incident, including the time, dates, names of those who were present, if any, and circumstances surrounding the incident. Record also if you have spoken directly to the individual about the unwanted behavior, details of the dialogue and the individual's response. Specific information related to the unwanted conduct is helpful to each of the resolution processes. While seeking resolution, employees are asked to respect confidentiality, where possible, and dignity for all those involved. In the workplace, discussion of concerns should be limited to those directly involved in the situation and/or to those who may be assisting in the resolution process.

REPORTING/INVESTIGATION PROCEDURES – BULLYING AND HARASSMENT

1. Informal Procedure

While in no way diminishing the issue or the effects on individuals, an informal approach can often resolve matters. As a general rule therefore, an attempt should be made to address the allegation of bullying/ harassment as informally as possible by means of an agreed informal procedure. The objective of this approach is to resolve the difficulty with a minimum of conflict and stress for the individuals involved.

(a) If you (the "**Complainant**") believe that you are being subjected to a form of bullying/harassment or inappropriate behavior, wherever possible, please speak with the alleged perpetrator(s) calmly and professionally and explain that the behavior in question is unacceptable and ask for the behavior to stop. In many cases, when the other person becomes aware that their conduct is unwelcome or is having a negative impact, he/she will stop the unwanted behavior. If the matter is resolved, then no further action is required. However, in circumstances where you find it difficult to approach the alleged perpetrator(s) directly, consider expressing your concerns confidentially to them in writing, ensuring that your communication is written professionally and respectfully. Again, if the matter is resolved, then no further action is required. However, if you do not feel able to approach the alleged perpetrator(s) with your concerns, of if your efforts to communicate with the alleged perpetrator(s) have been unsuccessful, then you should seek assistance and advice from a third party (the "**Third Party**"). That Third Party should be your immediate supervisor or a member of the Disclosure Committee. The immediate supervisor or Disclosure Committee member may obtain assistance from a Company representative to fulfill their requirements under this Policy as long as the Company representative is not the alleged perpetrator. If the alleged perpetrator(s) is a member of the Disclosure Committee, then you should seek assistance from the other member of the Disclosure Committee. If the alleged

perpetrators are both members of the Disclosure Committee then you should seek assistance from the Chairman of the Company's Audit Committee.

(b) Having consulted with the Third Party, you may request the assistance of the Third Party in raising the issue with the alleged perpetrator(s). In these circumstances, the approach of the Third Party to the alleged perpetrator(s) should be by way of a discussion with a view to resolving the issue in an informal manner. The Third Party may also facilitate problem-solving, through individual or joint discussions with you and the alleged perpetrator(s). Where a Third Party has been involved in facilitating problem-solving efforts, the Third Party will prepare a summation of the process and agreements reached and a copy of this summation will be provided to you and to the alleged perpetrator(s). If the matter is resolved through these informal procedures, then no further action is required. If resolution has not been reached through this avenue, then you may elect to file a formal complaint, but you are under no obligation to do so.

2. Formal Complaint and Investigation Procedures

If an informal approach is inappropriate or, if after the informal stage, the bullying/harassment persists, the following formal procedures should be invoked:

(a) You should make a formal complaint in writing to your immediate supervisor, or, if preferred, to the Disclosure Committee, or, if necessary as described earlier in the Policy, to the Chairman of the Audit Committee. The formal complaint should be confined to the precise details of the actual incidents of bullying/harassment (i.e. the names of the parties involved, any witnesses to the incident(s), the location, date and time of the incident(s), details about the incident(s) including the behavior and/or words used which led to the complaint, and any additional details which would assist with an investigation). Please attach any supporting documents such as e-mails, handwritten notes, etc.

(b) The alleged perpetrator(s) will be notified in writing that an allegation of bullying has been made against them. The alleged perpetrator(s) will be provided with a copy of the Complainant's statement and advised that they will be afforded a fair opportunity to respond to the allegation(s).

(c) You will be subject to an initial interview by a designated member of management who can be considered to be impartial, with a view to determining an appropriate course of action. An appropriate course of action at this stage, for example, could be exploring a mediated solution or a view that the issue can be resolved informally. Should either of these approaches be deemed inappropriate or inconclusive, a formal investigation of the complaint should take place with a view to determining the facts and credibility or otherwise of the allegation(s).

3. Investigation

(a) The investigation will be conducted internally by either a designated member or members of management or, if deemed appropriate, a third party. The investigation will be conducted with due respect for the rights of both the Complainant and the alleged perpetrator(s), providing both the Complainant and the alleged perpetrator(s) equal treatment in evaluating the allegation(s). In complex or sensitive situations, an external investigator might be hired by the Company.

(b) The investigator(s) should meet with the Complainant and the alleged perpetrator(s) and any witnesses or relevant persons with a view to establishing the facts and evidence surrounding the allegation(s).

(c) On completion of the investigation, the investigator(s) should submit a written report to management containing the findings of the investigation.

(d) Both the Complainant and the alleged perpetrator(s) should be given the opportunity to comment on the findings before any action is decided upon by management.

(e) Both the Complainant and the alleged perpetrator(s) should be informed in writing of the findings of the investigation.

4. Outcome

(a) Should management determine that the complaint is well founded, the alleged perpetrator(s) should be given a formal interview to determine an appropriate course of action. Such action could, for example, involve counseling, education and training, a formal written apology, a warning, a change of work assignment, and/or monitoring or progressing the issue through disciplinary action up to and including dismissal.

REPORTING/INVESTIGATION PROCEDURES – VIOLENCE

1. Immediate Actions

(a) While in no way diminishing the issue or the effects on individuals, an informal approach can often resolve matters. If the situation permits, an attempt should be made to address the actual incidents of violence or threats of violence using verbal and non-verbal de-escalation strategies. Speak with the alleged perpetrator(s) calmly and professionally and explain that the behavior in question is unacceptable, ask for the behavior to stop, and if it does not stop you will end the interaction. Exercise calm and neutral body language. In many cases, when the other person becomes aware that their conduct is unwelcome or has exceeded the limits of what is acceptable, he/she will stop the unwanted behavior.

(b) If de-escalation is not an appropriate response or does not change the alleged perpetrator(s)' behaviour, immediately remove yourself from danger and do not return if the threat persists. Do not fight back unless absolutely necessary, as a last resort, to protect yourself from harm or if your life is in imminent danger. Inform a supervisor or someone you trust as soon as possible from a safe location. If required, either you or the supervisor should contact the police and/or security without delay. If other employees are nearby and the alleged perpetrator(s) poses a threat to their safety, tell them to leave the immediate area as well.

2. Formal Complaint and Investigation Procedures

(a) All incidents of violence or threats of violence must be reported and documented, whether individual(s) are injured or not. You should make a formal complaint in writing to your immediate supervisor, or, if preferred, to the Disclosure Committee, or, if necessary as described earlier in the Policy, to the Chairman of the Audit Committee. The formal complaint should be confined to the precise details of the actual incidents of violence or threats of violence (i.e. the names of the parties involved, any witnesses to the incident(s), the location, date and time of the incident(s), details about the incident(s) including the behavior, words, and/or actions used which led to the complaint, and any additional details which would assist with an investigation). Please attach any supporting documents such as e-mails, handwritten notes, etc.

(b) If deemed necessary, the alleged perpetrator(s) will be removed from the premises as quickly as safety permits. If further deemed necessary, they shall be banned from access to the Company's premises pending the outcome of an investigation. The alleged perpetrator(s) will be notified in writing that an allegation of violence has been made against them. The alleged perpetrator(s) will be provided with a copy of the Complainant's statement and advised that they will be afforded a fair opportunity to respond to the allegation(s).

(c) You will be subject to an initial interview by a designated member of management who can be considered to be impartial, with a view to determining an appropriate course of action. A formal investigation of the complaint should take place with a view to determining the facts and credibility or otherwise of the allegation(s).

3. Investigation

(a) See Step 3 – Investigation in "Reporting/Investigation Procedures – Bullying and Harassment."

4. Outcome

(a) See Step 4 – Outcome in "Reporting/Investigation Procedures – Bullying and Harassment."

ANNUAL REVIEW AND RELATED MATTERS

These Reporting/Investigation Procedures (and the related Policy) will be reviewed annually by the Disclosure Committee and any changes to these Reporting/Investigation Procedures (and the related Policy) will be communicated to all persons to whom the Policy applies.

Employees will be provided with a copy of these Reporting/Investigation Procedures (and the related Policy) and are required to acknowledge that they have read these Reporting/Investigation Procedures (and the related Policy) when they are engaged or when the Reporting/Investigation Procedures (and related Policy) are introduced or significantly revised.

IMPLEMENTED BY THE DISCLOSURE COMMITTEE OF ORLA MINING LTD. – NOVEMBER 10, 2020.

REVIEWED AND AMENDED BY THE DISCLOSURE COMMITTEE OF ORLA MINING LTD. – AUGUST 11, 2023

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I acknowledge that I have received and read these Reporting/Investigation Procedures and the related Policy and I agree to conduct myself in accordance with these Reporting/Investigation Procedures and the related Policy.

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Signature

_____ _____
Print Name **Date**