LABOR RIGHTS POLICY
(the "**Policy**")

1. PURPOSE

Orla Mining Ltd. (the "**Company**") and its subsidiaries are committed to respecting the labor rights of all individuals impacted by its operations, including the Company's employees, contractors, suppliers and consultants. This Policy sets out the Company's commitment to labor rights and seeks to integrate labor rights best practices into the Company's management, business relationships, governance structures and programs.

2. APPLICATION

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

3. POLICY

As part of the Company's commitment to responsible corporate citizenship, the Company recognizes its responsibility to respect labor rights in all of its business activities. Therefore, the Company shall:

- Foster a safe, productive, supportive, and fair working environment that our employees, contractors, suppliers, consultants, and other stakeholders value.

- Support and respect internationally recognized labor rights as proclaimed by the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and international labor standards.

- Comply with the employment and labor laws and regulations that govern our operations, respecting local norms, practices, and laws.

- Offer fair pay, benefits, and time off for work performed, in accordance with local legislation.

- Conduct labor rights due diligence for any new project and/or in connection with a significant modification to an existing operation, particularly in cases where there is the potential for a negative impact to labor rights and especially in jurisdictions at high-risk of human and labor rights infringement.

- Integrate labor rights into business practices and processes that inform decision-making, including standards and procedures that promote labor rights due diligence and risk assessments.

- Never accept or tolerate retaliation against stakeholders who exercise these labor rights, or tolerate threats, intimidation or attacks against labor rights defenders.

- Within the context of the Company's own activities, business relationships and value chain, avoid causing or contributing to adverse labor rights impacts and provide remedy for impacts if and when they occur.

- Communicate actively and openly with employees to understand concerns, issues, perspectives and attitudes that could affect relationships, and work collaboratively with them

to solve labor-related problems, aiming for fair, win-win outcomes and solutions wherever possible.

- Take a proactive approach to handling labor relations matters, with the goal of resolving issues before they become more complex and difficult to resolve.

- Respect employees' right to freedom of association and collective bargaining. If employees choose to participate in organized labor, participate in collective bargaining in good faith.

- Remain neutral and avoid interference on union-related matters such as choice of representation.

- Engage and respond to workforce concerns, contribute to workforce-led development initiatives to aid in the attainment of their labor rights, and solicit input and feedback related to the Company's labor rights management approach and performance.

- Establish confidential grievance and whistleblower mechanisms for stakeholders to submit and resolve complaints related to labor rights matters and provide a system to resolve concerns about unfair treatment in the workplace.

- Provide training to employees, contractors and suppliers on respecting and understanding labor rights, as well as the content of this Policy.

- Where permissible by law, perform random audits to ensure contractors assigned to our mine operations are respecting their employees' labor rights.

This Policy does not supersede applicable laws and regulations in the jurisdictions in which we operate; rather, it is intended to describe our commitment to the protection of labor rights and the prevention of labor rights abuses.

4. ADMINISTRATION

The *Human Resources and Compensation 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 HUMAN RESOURCES COMMITTEE AND THE BOARD OF DIRECTORS OF ORLA MINING LTD. – November 11, 2025.