

4.4

Human Rights

Addressing Risks and Impacts

From exploration to closure and post-closure, Orla is committed to upholding human rights in every aspect of our value chain — be it in our workplace, our supply chain and business relationships, or the communities where we operate.

As a relatively new company, we are actively engaged in identifying human rights risks and impacts relevant to our activities. We are continuously strengthening our practices to effectively manage these risks and impacts. To date, our efforts have included:

- Conducting comprehensive environmental and social impact assessments to gain insights into salient human rights issues in the areas where we operate. We integrate these insights into our plans and activities across the business.

Why it Matters

Respecting fundamental human rights is not just a moral imperative but also a global standard of expected conduct for every business, as outlined in the United Nations' Guiding Principles on Business and Human Rights (UNGPs). We acknowledge that mining operations and other business activities have the potential to impact human rights, both positively and negatively.

Therefore, it is crucial that we take meaningful steps to understand, support, and protect the human rights of all individuals impacted by our operations, including our employees, contractors, business partners, community members, and Indigenous peoples. We believe that this approach is essential for attracting and retaining talent, mitigating risks across our value chain, and fostering enduring relationships with stakeholders and rightsholders.



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- Educating our workforce on human rights during the onboarding process and through ongoing training. We maintain a zero-tolerance policy towards any form of human rights infringement.
- Ensuring that our Code of Business Conduct and Ethics (the Code) reflects our commitment to high standards of professional conduct. The Code addresses various human rights topics, including prohibition of harassment and discrimination, child and forced labour, the provision of safe working conditions, and the minimization of environmental impact.

We expect our suppliers to hold the same high standard of commitment to human rights that we adhere to at Orla. Through screening and ongoing due diligence processes, we monitor our suppliers for any potential human rights risks, including issues such as child and forced labour, that may exist within our supply chain.

Orla supports and respects internationally recognized human rights as proclaimed by the International Bill of Human Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. Our dedication to upholding human rights is not just a principle but a fundamental aspect of our company-wide [Human Rights Policy](#). This includes our commitment to upholding the rights to freedom of association

and collective bargaining, as outlined in the policy. This policy is aligned with the Voluntary Principles on Security and Human Rights and the Organization for Economic Cooperation and Development Guidelines for Multinational Enterprises. Our commitment to respecting and promoting human rights is evident in our support for the relevant UN Sustainable Development Goals (SDGs), particularly SDG 5 Gender Equality and SDG 8 Decent Work and Economic Growth. These SDGs aim to ensure basic economic and social rights for all individuals worldwide, without discrimination. At Orla, we are committed to advancing these goals as part of our broader efforts to contribute positively to society and uphold the dignity and rights of all people.

Indigenous Peoples

At Orla, we hold ourselves accountable to uphold the rights and dignity of Indigenous peoples, guided by principles of respect, collaboration, and sustainability in our interactions and operations. While our operations are not located in areas where Indigenous communities reside, we recognize that we are situated on the traditional and ancestral territory of many nations, including our head offices in Canada and our project in the state of Nevada, where Indigenous Peoples have long been stewards and protectors of the land.

Our [Indigenous Peoples Policy](#) underscores the importance of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and the International Labour Organization Convention 169 (Indigenous and Tribal Peoples Convention). This policy is applicable to, and the responsibility of, all Company directors, officers, and employees, contractors, and relevant business partners at each of our sites. Introduced in 2024, this policy outlines our commitment to building positive and sustainable relationships with Indigenous communities and focuses on open dialogue and collaboration to achieve mutual goals. This commitment includes meaningful engagement, transparent information sharing, and taking appropriate steps to address potential impacts, implement accommodation measures, and foster opportunities for collaborative, long-term value creation for both the Company and Indigenous communities.

Additionally, the Company is committed to capacity-building strategies, including employment, education, training, and business initiatives, in collaboration with Indigenous organizations. Orla is also committed to incorporating Indigenous knowledge and culture into our operations, managing impacts on long-term sustainability, considering historic and current land use, and providing a culturally sensitive and supportive work environment for all employees.

