



CLOSURE AND RECLAMATION MANAGEMENT STANDARD

INTRODUCTION

Orla Mining Ltd. and its subsidiaries (“Orla” or the “Company”) is committed to allocating sufficient resources to meet Orla’s environmental objectives, including ensuring that an effective closure strategy is in place at all stages of project development and that concurrent reclamation is undertaken as early as possible. We will:

- Meet or exceed industry best practices and norms applicable to closure and reclamation;
- Develop meaningful and effective strategies for engaging with our stakeholders; and
- Contribute to the social, cultural, and economic development of the communities where we operate.

The requirements in this Closure and Reclamation Management Standard have been informed by the World Gold Council’s Responsible Gold Mining Principles, and the Mining Association of Canada’s Towards Sustainable Mining Mine Closure Framework.

SCOPE

This Standard is applicable to, and is the responsibility of, all the Company directors, officers, employees, contractors, sub-contractors, consultants, and suppliers. All such individuals shall conduct their activities in a manner that is aligned with this Standard and minimizes environmental, social and health and safety risks where feasible.

KEY TERMS

- **Closure:** Post-reclamation activities required to close and secure a site to maintain compliance with environmental and health and safety regulations.
- **Financial Assurance:** A financial mechanism or instrument to ensure that funds are available for a regulatory authority (or functional equivalent) to ensure that the required reclamation, decommissioning, monitoring, cleanup, or other activities at a specific facility or site are undertaken if the responsible entity is unable or unwilling to perform required actions.
- **Post-Closure:** The period after reclamation and closure activities have been completed and long-term management activities are occurring to ensure the site remains stable.
- **Reclamation:** The process of achieving stability, hydrologic balance, protection of water resources, and converting disturbed land to a productive, potentially productive or any other planned post-mining land use.
- **Stakeholders:** Individuals, groups, and public, private, or civil society organizations who directly or indirectly engage with and affect Orla’s operations, or may have interests in an Orla project, as well as the individuals, groups, and public, private, or civil society organizations that Orla’s

operations may directly or indirectly impact. Among others, Orla's stakeholders include employees, investors, nations and communities where we operate.

REQUIREMENTS

We will:

- 1 Develop and maintain mine closure and reclamation plans for new and existing projects, inclusive of reclamation, progressive reclamation, closure, and post-closure costs and activities, at a level of detail appropriate to the stage of project development and understanding of site conditions.
- 2 Engage with relevant authorities and affected stakeholders to identify, prioritize, and review risks and opportunities associated with mine closure and reclamation, as well as to develop a closure vision and post-closure objectives and commitments.
- 3 Review and update closure and reclamation plans and associated cost estimates at least every five years, or more often if required by applicable laws, if there is a significant change in the operation environment, or if there are significant developments in new technologies and closure techniques.
- 4 Identify and plan for temporary closure scenarios, including monitoring and maintenance, which addresses the social, environmental and health and safety concerns of affected stakeholders.
- 5 Establish financial assurance for closure that is independently guaranteed, reliable, and readily liquid, and that is sufficient to cover the costs of site management, reclamation, progressive reclamation, closure and post-closure activities, in accordance with applicable laws where they exist.
- 6 Establish monitoring programs that measure and assess the effectiveness of mine closure and reclamation, based on the vision and objectives developed with affected stakeholders.
- 7 Publicly communicate the most recent versions of mine closure and reclamation plans, progress reports, and financial assurance terms to affected stakeholders.

RELATED POLICIES AND STANDARDS

Internal documents

- Climate Change Policy, Orla, 2023
- Code of Business Conduct and Ethics, Orla, 2020
- Corporate Social Responsibility Policy, Orla, 2020
- Environmental, Sustainability, Health and Safety Policy, Orla, 2020
- Human Rights Policy, Orla, 2023
- Indigenous Peoples Policy, Orla, 2023
- Responsible Procurement Standard, Orla, 2024
- Stakeholder Engagement and Community Response Standard, Orla, 2023

Industry references

- Guidance on implementing and assuring the RGMPs, World Gold Council, 2019
- Mine Closure Framework, Towards Sustainable Mining, 2008
- Responsible Gold Mining Principles, World Gold Council, 2019
- Standard for Responsible Mining and Mineral Processing, Initiative for Responsible Mining Assurance, 2023