



STAKEHOLDER ENGAGEMENT AND COMMUNITY RESPONSE STANDARD

INTRODUCTION

Orla Mining Ltd. and its subsidiaries (“Orla” or the “Company”) is committed to respecting local cultures, values, and traditions, and adopting an open communication policy regarding Orla’s activities with all impacted parties to achieve transparency in the Company’s socio-environmental performance. We will:

- develop meaningful and effective strategies for engaging with our stakeholders;
- consult with local communities to identify effective and culturally appropriate development goals; and
- establish community response mechanisms based on international best practices.

The requirements in this Stakeholder Engagement and Community Response Standard have been informed by industry best practices, including the World Gold Council’s Responsible Gold Mining Principles, and the Mining Association of Canada’s Towards Sustainable Mining Indigenous and Community Relationships Protocol.

SCOPE

This Standard is applicable to, and is the responsibility of, all the Company’s directors, officers, employees, subsidiaries, contractors and suppliers. All such individuals shall conduct their activities in a manner that is aligned with this Standard.

KEY TERMS

- **Claim:** Verbal or written expression of dissatisfaction by a public or private individual or company regarding an impact caused by the Company’s operations in its area of influence.
- **Engagement:** Ongoing interaction and dialogue with potentially affected stakeholders that enables the Company to hear, understand and respond to their interests and concerns, including through collaboration.
- **Community Response Mechanism (CRM):** Formalised means through which individuals or groups can raise grievances, requests and claims regarding the Company’s impacts on them and seek engagement with the Company.
- **Grievance:** Verbal or written expression of dissatisfaction by a stakeholder or group of stakeholders regarding the company’s activities.
- **Area of influence:** The geographic area within which a mining project may potentially directly and indirectly cause impacts. The area of direct impacts caused by mining-related activities includes the physical mine site footprint, areas adjacent to the project site that are affected by emissions and

effluents, power transmission corridors, pipelines, borrow and disposal areas, and the area affected by associated facilities that, although not part of the project that is being assessed, would not have been constructed in the absence of the project. Areas indirectly affected by mining-related activities include the physical footprint of non-project activities in the surrounding area that are caused or stimulated by the project plus the area affected by their emissions and effluents¹.

- **Indigenous Peoples:** Indigenous communities, peoples and Nations who have a historical continuity with pre-conquest and pre-colonial societies, consider themselves distinct from settlers, whose ancestors lived on their territories, and who irrespective of their legal status, retain some or all of their own social, economic, cultural and political institutions.
- **Request:** A query by a stakeholder for information or guidance regarding the activities the company carries out.
- **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's project, as well as the individuals, groups, and public, private, or civil society organizations that Orla's operations may potentially directly and indirectly cause impacts. Among others, Orla's stakeholders include employees, investors, nations and communities where we operate.
- **Under-represented:** Individuals or groups that may be at heightened risk of vulnerability or marginalization, that face a particular risk of being exposed to discrimination and other adverse impacts. Individuals or groups who are disadvantaged, marginalized, or excluded from society are often particularly vulnerable (e.g., children, women, Indigenous Peoples, people belonging to ethnic or other minorities, persons with disabilities, or through poverty).

REQUIREMENTS

We will:

- 1 Identify, document, and regularly review all stakeholders who have an interest in, may be affected by, or could influence our operations, including under-represented groups and individuals or groups who self-identify as under-represented stakeholders.
- 2 Develop, resource, implement and maintain an annual stakeholder engagement plan, engaging stakeholders on issues of interest or concern to them through means that are relevant, accessible, timely, culturally-appropriate and communicated clearly in their local language.
- 3 Assess and, where necessary, support the capacity of stakeholders to effectively engage on issues and decisions that affect them.
- 4 Where Indigenous Peoples are present in the areas where we operate and may be directly affected by our activities, we will follow regulations and procedures according to the jurisdiction where the Company is operating, and the Company commitment established in our Indigenous Peoples Policy.
- 5 Establish and maintain an accessible and culturally appropriate community response mechanism to receive, assess, manage, document and respond to stakeholder grievances, requests and claims in a timely manner.
- 6 Inform and regularly update stakeholders on how to access the community response mechanism, protecting confidentiality where requested and educating the parties involved to prevent retaliation.
- 7 Publicly communicate our stakeholder engagement and community response processes, topics, activities and outcomes on an annual basis, protecting confidentiality where necessary.

¹ Adopted from ICMM Human Rights Due Diligence Guidance, May 2023, retrieved from https://www.icmm.com/website/publications/pdfs/social-performance/2023/guidance_human-rights-due-diligence.pdf?cb=58439

- 8 Develop, provide and regularly review culturally specific training on the Stakeholder Engagement Procedure to designated personnel to support implementation of the requirements in this Standard.
- 9 Regularly review stakeholder engagement and community response processes and outcomes with senior management and affected stakeholders, and conduct an annual review to identify opportunities for continuous improvement.

RELATED POLICIES AND STANDARDS

Internal documents

- Code of Business Conduct and Ethics, Orla, 2020
- Community Investment, Donation and Sponsorship Protocol, Orla, 2023
- Corporate Social Responsibility Policy, Orla, 2020
- Diversity Policy, Orla, 2018
- Environmental, Sustainability, Health and Safety Policy, Orla, 2020
- Community Investment Standard, Orla, 2023
- Stakeholders Engagement Procedure, Orla, 2023
- Anti-Bribery and Anti-Corruption Policy, Orla, 2023
- Climate Change Policy, Orla 2023
- Indigenous Peoples Policy, Orla 2023
- Human Rights Policy, Orla 2023

Industry references

- Indigenous and Community Relationship Protocol, Towards Sustainable Mining, 2021
- Guidance on implementing and assuring the RGMPs, World Gold Council, 2019
- Responsible Gold Mining Principles, World Gold Council, 2019
- Standard for Responsible Mining, Initiative for Responsible Mining Assurance, 2018