



Sustainability Report **2024**

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## 1.1 Performance snapshot

# 2024 Sustainability Performance Snapshot

As at December 31, 2024

## Environment

0.24 ↑

tCO<sub>2</sub>eq/oz Au PRODUCED

**GHG emissions intensity**  
(Scope 1 and 2) at our operating mine, Camino Rojo

0.12 ↔

m<sup>3</sup>/t

**Water use intensity**  
(volume of freshwater consumed per tonne of processed ore)

0 ↔

major/reportable **environmental incidents** across all of our sites

## Social



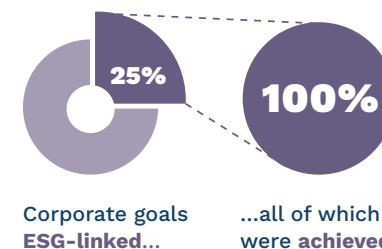
\$10.7M ↔

local **community economic impact** from Camino Rojo, including salaries, local suppliers, land leasing, and local infrastructure

2.59 ↑

**lost time** injury frequency rate across all sites and the corporate offices (target is zero)

## Governance



100% ↔

of local **workforce completed training** on our Code of Conduct and Ethics



The direction of the arrows indicates the relative change compared to 2023 values.

## 1.2

# Foreward from our Leadership Team

**We are pleased to share Orla's 2024 Sustainability Report, a reflection of our continued efforts to build a company that is responsible, resilient, and deeply connected to the people and places that shape our work.**

From the beginning, we have believed that mining should do more than access resources. The resources we mine should create lasting value for the people and communities connected to our work. That belief continues to guide us today. Even as global market conditions fluctuate and sustainability expectations evolve, our approach remains steady. We do not see sustainability as a trend to follow, but as something deeply woven into how we operate.

Our Towards 2030 Sustainability Strategy, launched in 2022, sets a long-term direction for integrating environmental, social, and governance practices across Orla. It is a roadmap that challenges us to think big, act boldly, and stay focused on creating value while minimizing our impacts.

### Progress in 2024

This past year was a pivotal one for Orla. We reached several operational milestones, including record production at Camino Rojo, the completion of a drill campaign to extend that orebody, and another strong year of environmental and exploration work at the South Carlin Complex in Nevada. Most notably, we expanded into Canada with the acquisition of the Musselwhite gold mine in Northwestern Ontario in early 2025. This addition strengthens our company and positions us for long-term success.

Our strong safety culture continues to be a cornerstone of how we operate. In 2024, we recorded a lost-time injury frequency rate of 2.59 across all sites and had zero fatalities. Employees completed an average of 106 hours of health, safety, and emergency response training, reflecting our shared commitment to keeping one another safe.

On the environmental front, we introduced five new environmental standards to





## 1.2 Forward from our Leadership Team

strengthen governance and accountability across the company and continue to work to identify opportunities for improving efficiency on water use and GHG emissions. We completed and submitted the environmental permit application for the Camino Rojo pit extensions and transition to a potential underground mine. We continue regular engagement with federal and state authorities, as well as employees and nearby communities. At the South Carlin Complex, we continued to advance permitting efforts through ongoing environmental studies and collaboration with federal regulators for the South

Railroad Project.

We also made strong progress in embedding sustainability in everything we do. 25% of our corporate objectives in 2024 were directly tied to ESG priorities, and we met or exceeded each one of them. We advanced diversity and equity, continued improving our sustainability governance, and saw our performance reflected in improved external ESG ratings, including from ISS and Scotiabank.

Our community contributions also made a meaningful difference. In 2024, we contributed 10.7 million US dollars through

wages, local procurement, land leases, infrastructure investments, and community support. These contributions reflect our belief that responsible mining must deliver tangible and lasting value to the regions where we operate.

### Looking Ahead

None of this would be possible without the dedication and hard work of our employees and contractors. Their passion, integrity, and perseverance are what move Orla forward, and we are proud of what we accomplished together this past year.

As we look to the future, with Musselwhite Mine joining Camino Rojo Mine and South Railroad Project in our growing portfolio, we are excited about the path ahead. Orla is well positioned to lead with purpose, operate responsibly, and continue growing in a way that reflects our values.

Thank you for being part of this journey.

Sincerely,

**The Orla Mining Senior Leadership Team**



**Left to right:**  
**Jason Simpson** President and CEO, **Etienne Morin** Chief Financial Officer, **Andrew Cormier** Chief Operating Officer, **Silvana Costa** Chief Sustainability Officer, **Sylvain Guerard** SVP, Exploration

# 1.3

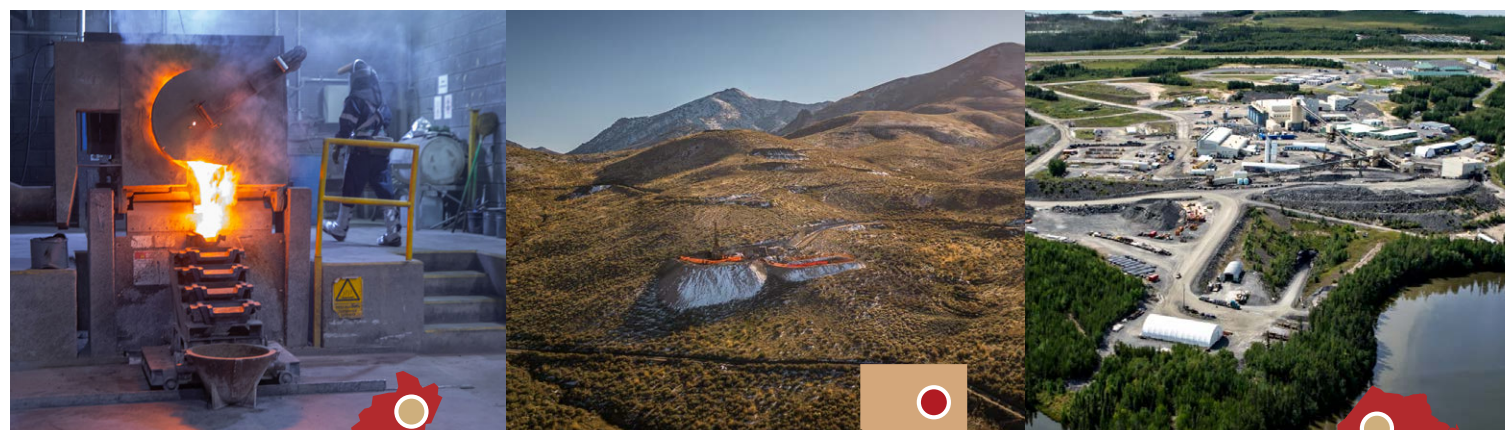
## Orla at a Glance

Orla Mining is a Canadian company focused on creating value by responsibly finding, building, and operating high-quality mines.

We have three material properties for the purposes of National Instrument 43-101, located in Mexico (Zacatecas), the U.S. (Nevada), and Canada (Ontario), encompassing two operating mines and one development project.



- **Operating**  
(Camino Rojo, Musselwhite)
- **Exploration & Development**  
(South Railroad)
- **Other properties**  
(Panama)



### Camino Rojo

Zacatecas, Mexico

#### Operating gold and silver mine

Our foundational asset, Camino Rojo was first acquired in 2017 from Goldcorp Inc. and successfully began commercial production in April 2022.

[LEARN MORE →](#)



RESERVES  
**854 koz Au**

RESOURCES (M&I)<sup>1</sup>  
**5.0 Moz Au**

LAND PACKAGE  
**139,000 ha**

### South Railroad

Nevada, U.S.A.

#### Exploration and development

South Railroad was acquired in August 2022, and is an oxide heap leach project with sulphide potential. This project is situated within the prospective land package called the "South Carlin Complex".

[LEARN MORE →](#)



RESERVES  
**1.6 Moz Au**

RESOURCES (M&I)<sup>1</sup>  
**1.8 Moz Au**

LAND PACKAGE  
**25,000 ha**

### Musselwhite

Ontario, Canada

#### Operating gold and silver mine

Our newest addition, Musselwhite was acquired in February of 2025.

[LEARN MORE →](#)



RESERVES  
**1.5 Moz Au**

RESOURCES (M&I)<sup>1</sup>  
**2.0 Moz Au**

LAND PACKAGE  
**65,000 ha**

<sup>1</sup> See the section Cautionary Statements – Technical Information for additional information



### 1.3 Orla at a Glance

**Orla is headquartered in Vancouver, Canada and trades on the TSX and the NYSE American.**

Orla is led by a group of mining leaders with extensive experience in exploration, project development and construction, operations, and environmental and social stewardship. Over the past several years, Orla's formula for growth and value creation has focused on acquiring and developing a portfolio of assets, collaborating with reputable partners, and driving value through ESG initiatives.

# 779

**Employees**, direct and indirect

# 136,748 oz

**Gold produced in 2024**

# \$343.9M

**Revenue in 2024**



# 1.4

## About this Report

### Reporting Framework and Materiality

The content in this report focuses on sustainability topics identified as most important to the Company's groups of interest and its business, according to its 2023-2024 updated materiality assessment. Refer to Material Topics for more details. Our report disclosures are aligned with the Sustainability Accounting Standards Board (SASB) requirements and the Task Force for Climate-Related Financial Disclosures (TCFD) framework. As the Company prepares its consolidated financial statements in accordance with International Financial Reporting Standards (IFRS) issued by the International Accounting Standards Board (IASB), we will progressively incorporate the IFRS sustainability disclosure standards defined as IFRS S1 and IFRS S2, which are consistent with and/or integrate the SASB and TCFD frameworks.

Unless otherwise noted, information in this report covers the 2024 calendar year, which is also our fiscal year. Where data is available and relevant, we also provide comparative data for 2022 and 2023. Throughout this report, "Orla", "Orla Mining", "the Company", "we", "our" and "us" refers to Orla Mining Ltd and its subsidiaries, unless context otherwise requires. All monetary amounts are reported in United States dollars ("US dollars" or "US\$") unless otherwise noted.

### Our Process

The report was prepared by our Sustainability Team in collaboration with internal subject matter experts and external consultants. It has been reviewed by Orla's executive team and the Environmental, Sustainability, Health and Safety Committee, and approved by the Board of Directors. We have not sought external, independent assurance for this report.

This report captures metrics that were available and reliable, related to subjects considered significant to the Company's operations, performance, and stakeholder interests. As an emerging gold producer, our projects are in various stages of activity, and we continue to build, implement and improve our data collection systems and processes.

### Additional Information

For a complete picture of our business and our 2024 performance, please read this report in conjunction with our [2024 Annual Information Form](#), [2025 Annual Information Circular](#), [2024 ESTMA Report](#), [2024 Modern Slavery Report](#) and Technical Reports about our assets, which are available on our website at [www.orlamining.com](http://www.orlamining.com).

### Reporting Scope and Boundary

This report reflects activities and results for the following operations:

#### Our Operating Mine in 2024:

Camino Rojo (Mexico)

#### Our Development Project in 2024:

South Railroad (Nevada, U.S.)

#### Our Corporate Offices:

Vancouver, BC (Canada)

Toronto, ON (Canada)

**Orla acquired the Musselwhite Mine in 2025. As the acquisition occurred after the 2024 reporting period, this report does not include data or disclosures related to that asset.**





**2.1 Q&A with our Chief Sustainability Officer**

**2.2 Sustainability Strategy: Towards 2030**

**2.3 Material ESG Topics**

**2.4 ESG Scorecard**

**2.5 Orla's Contribution to Sustainable Development Goals**

# Approach



## 2.1 Q&A with our Chief Sustainability Officer

### **You recently joined Orla as the new CSO. What excites you most about the role?**

Everything! It's an exciting and growing company with a fantastic team, portfolio of projects, and long-term vision. In my role I relish the opportunity to serve as a strong voice for sustainability and help Orla continue pursuing responsible business growth. The commitment to sustainability really comes from the top at Orla. Every executive here understands the critical value of improved sustainability performance, and ESG considerations are top of mind in business decision-making.

I'm thrilled too that my role covers a broad realm of the business, including environmental management, health and safety, human resources, Indigenous engagement, government and community relations, social investments, and more. That means I have the ability to 'connect the dots' across these areas, mobilize increased collaboration between different functions and share best sustainability practices, to create a more united and impactful sustainability effort.

### **What are the biggest sustainability opportunities for Orla in the second half of this decade?**

I believe Orla is on the right track to help build a more sustainable mining sector, and we can further strengthen our position in this area. For example, with Orla's new Musselwhite mine in Ontario, there are now opportunities to work with local Indigenous communities to build meaningful, respectful and trusted relationships, and meaningfully contribute to advancing reconciliation in Canada. This is valuable and important work that takes time and involves all levels across the company. In Mexico, the federal government continues to prioritize positive social impact and has ramped up its focus on environmental stewardship, including addressing climate change, and protecting biodiversity and water resources. This gives us an opportunity to continue to create social value and contribute to national environmental goals through Orla's environmental programs. It is also an opportunity to build building value at the local level through collaborative multistakeholder initiatives within the communities surrounding our Camino Rojo mine.

### **On the flipside, what are the biggest sustainability challenges facing Orla?**

Constant change can be challenging, especially for companies expanding in new jurisdictions. Internally, we need to be careful and thoughtful as we evolve, and consistently apply our sustainability practices, as Orla grows. Sometimes, as companies expand, there is the risk of programs losing their momentum as the team's focus is diverted to shifting priorities. With our Musselwhite acquisition being integrated this year, we're very intentional in our work to bring Orla standards and ways of doing business to that operation while learning from leading practices in place at Musselwhite.

Externally, the challenges are many and vary for each mine. Operating in three countries – Mexico, the U.S. and Canada – we encounter very different political and socio-economic environments. Geopolitical and global risks, in particular, are omnipresent and always tricky to navigate. In the last couple of years, we have also seen increasing anti-ESG sentiment out there. Despite these challenges, we remain laser focused on implementing our Towards 2030 Sustainability Strategy and continually

updating it to reflect the particular needs of our company and of those impacted by our business. Sustainability perspectives may shift over time, but we stay true to our goal of creating a net positive contribution for stakeholders and rightsholders in our value chain.

### **What is your vision for the road ahead in 2025 and beyond?**

My vision is based on a belief that our sustainability efforts can be transformational and help Orla become a mining company that really brings tangible, long-term value, including in the areas of environmental stewardship and lasting social impact. I truly believe that we can maximize our positive contributions by better connecting the dots – since the thread of sustainability weaves throughout the company, touching employment, community resilience, people development and so on – and embedding sustainability deeply into Orla to ensure it is part of how we run our business and measure our success.

**Silvana Costa**  
Chief Sustainability Officer



## 2.2

# Sustainability Strategy: Towards 2030

**Orla's commitment to sustainability is based upon creating a lasting positive value for communities, partners, and other stakeholders.**

We acknowledge the significance of sustainable mining practices and have taken proactive steps to integrate robust ESG principles into our operations. We use a sustainability mindset to guide our decisions, including capital allocation.

In 2022, we launched our **Towards 2030 Sustainability Strategy**. This strategy amplifies our commitment to being a responsible, sustainability-driven company, and charts a long-term roadmap for our sustainability ambitions.

### Our Sustainability Goal and Pillars

Integrating sustainability into our business purpose means that every member of the Orla team and our partners are committed to the journey toward achieving a net-

positive impact. It revolves around the objective of contributing more to society than we take from it.

Our strategy, developed with input from multiple stakeholders, has three pillars:

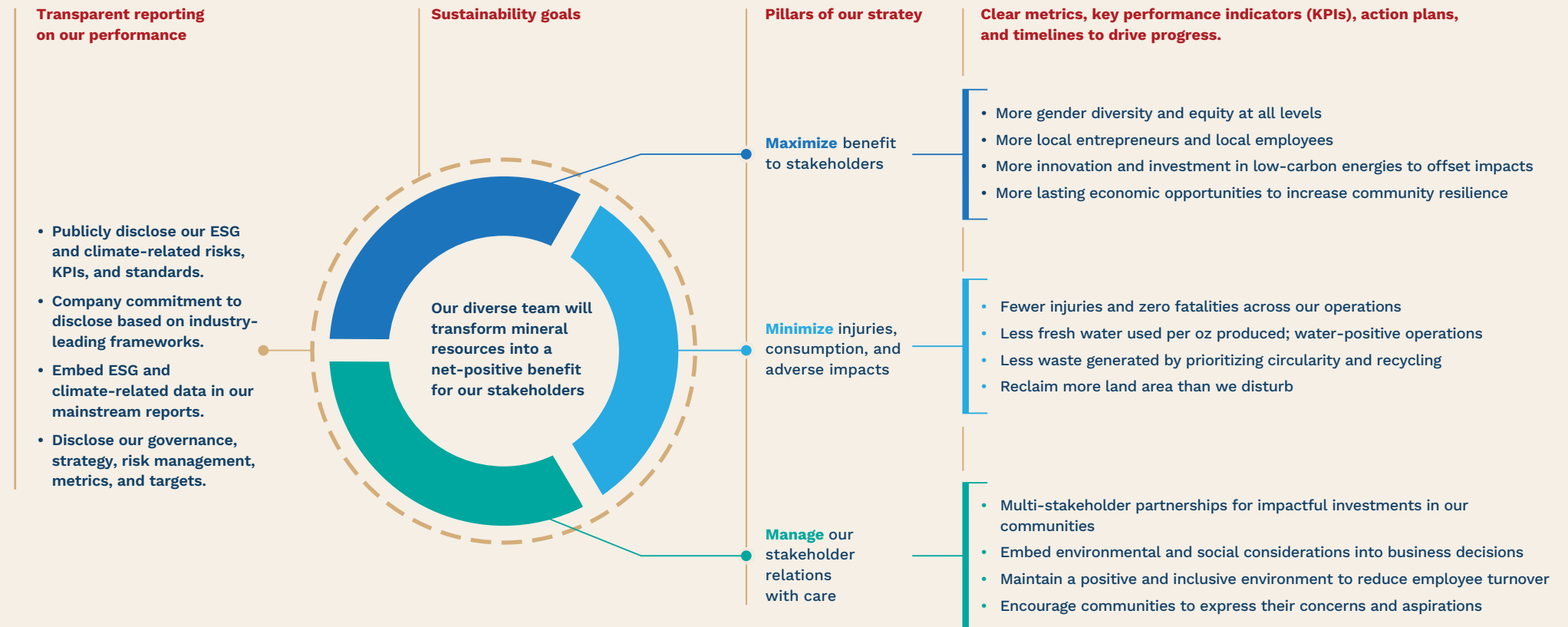
- 1. Maximize** benefit to stakeholders
- 2. Minimize** injuries, consumption, and impacts
- 3. Manage** our stakeholder relations with care

In each of these pillars, we have set clear metrics, key performance indicators (KPIs), action plans, and timelines to drive progress.



## 2.2 Sustainability Strategy: Towards 2030

### Sustainability Strategy to Drive Progress





## 2.2 Sustainability Strategy: Towards 2030

### How We Plan to Get There

As a growth-oriented company, our multi-year strategy will follow critical steps:

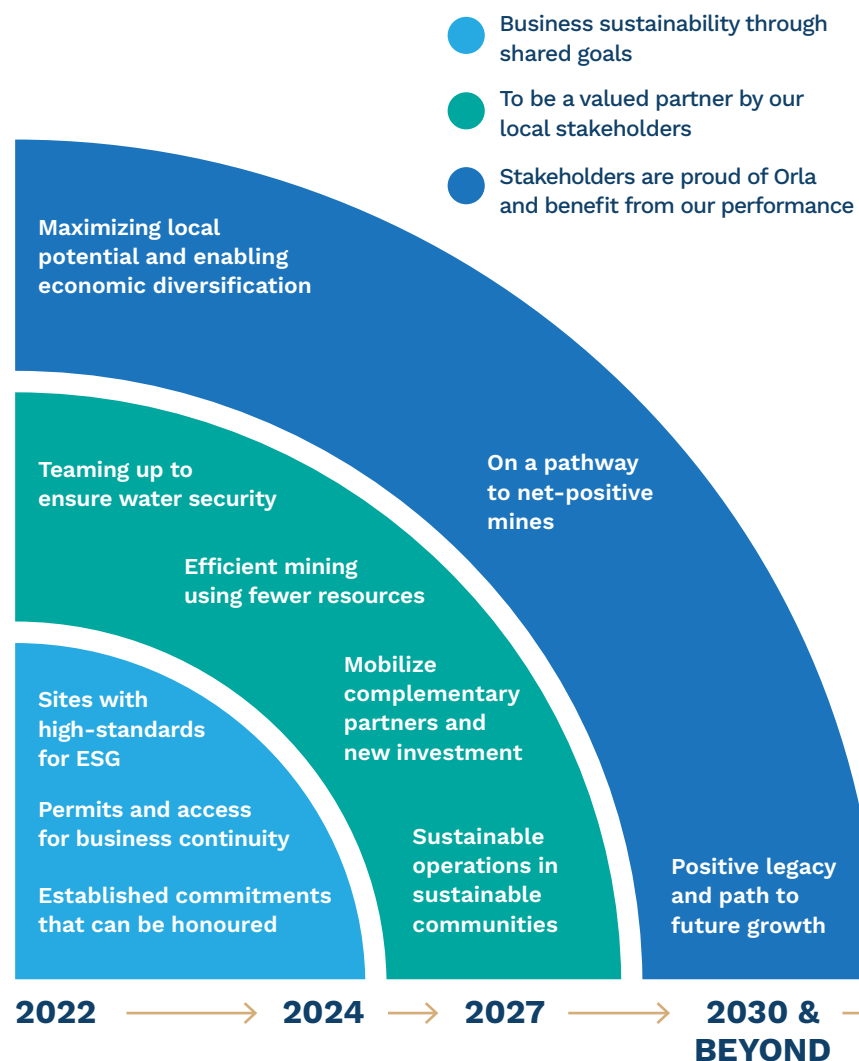
- Complete our climate-related vision and strategy to manage, adapt to, and mitigate climate impact.
- Include science-backed insights to identify, understand, assess, and report how climate change and the transition to a lower-carbon economy could impact our operations, the health and safety of our employees, infrastructure, and neighbour communities. In 2024, we continued working with specialized advisors to improve our data systems and models to monitor climate change scenarios across our sites. Our environmental reports to regulators are incorporating science-based analysis considering climate change scenarios.
- Continue advancing gender diversity and equity across all levels of the organization, with targeted actions to increase female representation and strengthen our involvement in Women in Mining (WIM) networks.
- Invest in leadership development through the LEAD Program, designed to foster engaged and capable leaders by providing customized training and creating a culture of continuous learning and collaboration.
- Continue measuring our Scope 1, Scope 2, and Scope 3 GHG emissions.

- In 2024, we incorporated specialized accounting systems to monitor our GHG-related data, especially Scope 3, which are the result of activities across our value chain.
- Continue measuring our water intensity indicators and identify strategies to minimize freshwater consumption across our sites.
- Identify additional sustainability targets and prepare strategies to achieve those targets.
- Identify areas to reduce our direct emissions and opportunities to use potential offsets. A more detailed and comprehensive understanding of our footprint will enable our operations teams at various sites to identify hotspots and conduct simulations, both dynamic and static, to incorporate efforts aimed at reducing our environmental impact in line with long-term and intermediate targets.

### Transparent Reporting

Transparent reporting on our performance stands as a core principle for our company and underpins the ESG strategy. We are dedicated to transparently disclosing ESG-related matters across all our operations. Through this report, our sustainability website, and other disclosures, we aim to uphold accountability, keep stakeholders informed, and gain insights on how to improve our efforts.

## 2030 Sustainability Strategy



## 2.3

# Material ESG Topics

**It is our responsibility to transform mineral resources into a net-positive benefit for those around us. To effectively share value, we must understand what matters most to them.**

### Materiality Process

Early in 2024, we updated our biennial Materiality Assessment to identify and prioritize the ESG issues of greatest importance to our stakeholders as well as our business.

To maintain consistency and to keep an independent assessment of ESG materiality, we continued to engage an external group, ESG Global Advisors, to facilitate the process using its proprietary methodology. For this exercise, we conducted an internal stakeholder survey among management, reviewed peer and investor's ESG priorities, and examined industry and global trends and regulations to understand the evolving ESG landscape.

Drawing on a wide range of research and sources, ESG Global compiled a list of potentially material ESG factors to Orla and categorized their importance based on importance to stakeholders, impact to business, and likelihood of occurrence. Orla's management reviewed and validated the results.

The results of the 2023 materiality assessment in comparison to our 2021 baseline indicate that water management, labour relations, security and human rights, and waste and hazardous materials management are the most salient factors. These factors are becoming more prominent and impacting company value, performance, or access to capital within both short and longer timeframes. The assessment also identified the emergence of geopolitics and ESG governance as new core factors of most interest to investors and other capital market participants. Together, the factors above have the highest priority inclusion in our sustainability strategy, policies, practices, and external disclosures.





## 2.3 Material ESG Topics

### Materiality Matrix

- Governance
- Social
- Environment

#### Core

Highest priority ESG factors given their potential to impact company value over the short term, as well as over longer time frames.

#### Enhanced

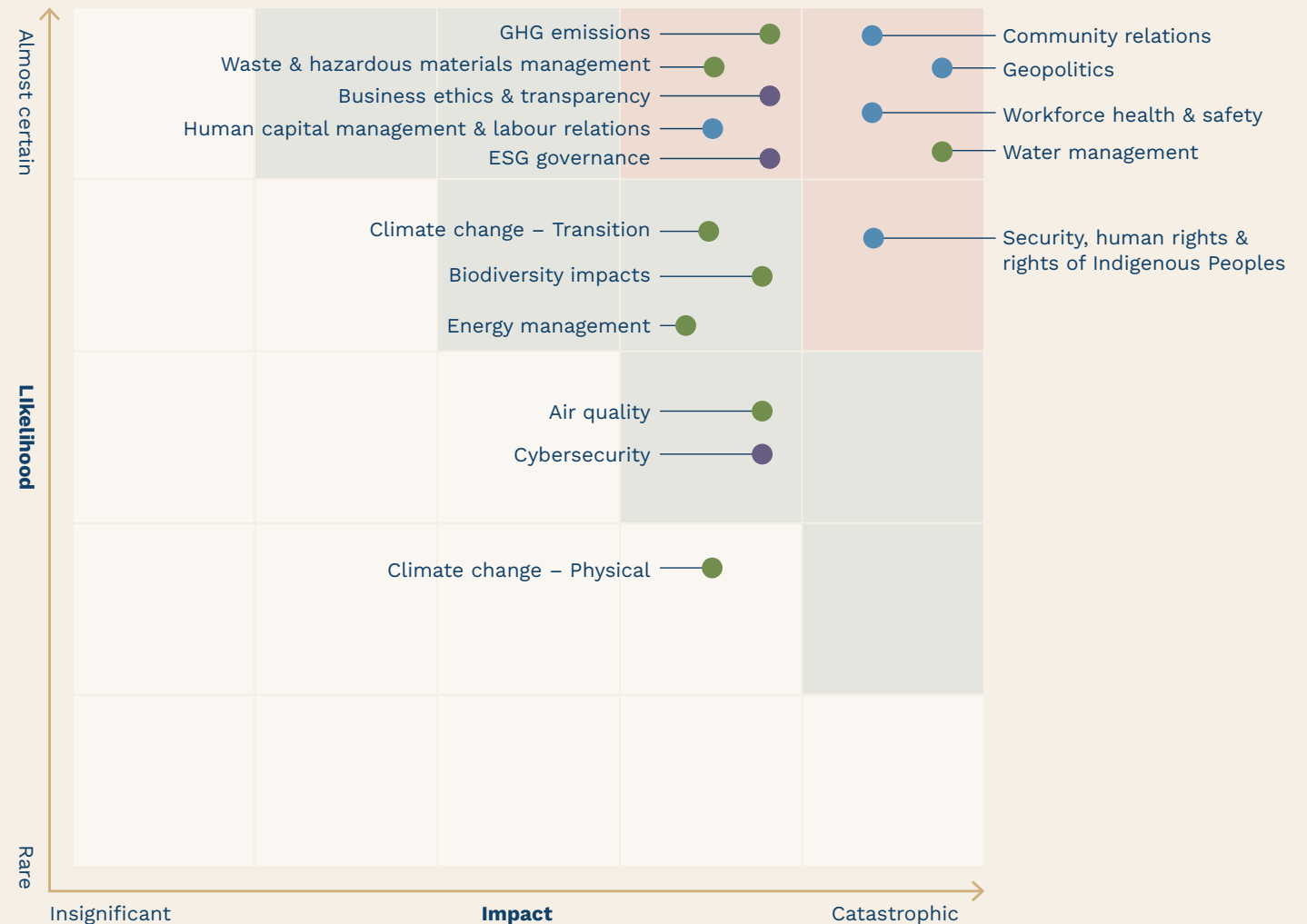
ESG factors with the potential to impact company value over the medium term.

#### Emerging

ESG factors growing in importance that should be monitored given their potential to impact company value over the long term.

**Note:** ESG factors are organized based on impact to Orla and the likelihood of occurrence. Each cell represents a magnitude of one (e.g., 'Climate Change - Physical' is rated as 4 for Impact and 2 for Likelihood). Box colour indicates the ESG factors as an Emerging, Enhanced, or Core issue.

**ESG factors within the same cells are equivalent in rating.**



## 2.4 ESG Scorecard

**To measure our progress and drive impact around our ESG actions, we have set targets and defined key performance indicators.**

**The following scorecard shows our performance.**

1 A fatality that occurs to a direct or indirect employee while engaged in a legal work activity or present at the site of the incident as a requirement of his/her job.

2 Lost Time Injury Frequency Rate = (lost time injuries x 1,000,000) / person hours.

3 Community disputes that caused production disruption and cataloged as severe or extreme; represents social license to operate.

4 Significant environmental incident is defined as incidents level 4 or 5 according to the USEPA.

5 Local communities are those that are directly influenced by our operations, and exploration and development projects.

6 The decrease is due to an increase in the size of the management team and not a reduction in female representation.

	2024	2023	2022
Fatalities <sup>1</sup>	<b>0.00</b>	0.00	0.00
Camino Rojo LTIFR <sup>2</sup>	<b>3.94</b>	1.35	0.00
Orla all assets LTIFR <sup>2</sup>	<b>2.59</b>	1.71	1.49
Significant community disputes <sup>3</sup>	<b>0.00</b>	0.00	0.00
Significant environmental incidents <sup>4</sup>	<b>0.00</b>	0.00	0.00

	2024	2023	2022
Direct employees from local communities <sup>5</sup> *	<b>58.0%</b>	48.7%	59.4%
Women in the direct labour force *	<b>31.0%</b>	29.8%	29.3%
Women on the Board of Directors	<b>30.0%</b>	30.0%	25.0%
Women among corporate management <sup>6</sup>	<b>11%</b>	12.5%	14.3%
Scope 1 and 2 GHG emissions (ton CO <sub>2</sub> eq) **	<b>32,221</b>	23,350	21,083
GHG intensity (tCO <sub>2</sub> eq/oz Au produced) **	<b>0.24</b>	0.19	0.19
Freshwater use intensity (volume of freshwater consumed per tonne of processed ore (m <sup>3</sup> /t)) **	<b>0.12</b>	0.12	0.15
Community investments (thousands) *	<b>\$ 1,624</b>	\$ 1,579	\$ 1,448

\* Includes Camino Rojo mine in Mexico, South Railroad exploration projects. \*\* Includes Camino Rojo only.



## 2.5

# Orla's Contribution to Sustainable Development Goals

### No Poverty

1

**End poverty in all its forms everywhere.**

- Generate economic benefits for local communities through job creation, salaries, taxes paid, purchases across our supply chain, and land leasing.
- \$1.6 million contributed to the communities of the direct area of influence within the municipality of Mazapil, State of Zacatecas, Mexico, and Nevada.

→ **Learn more: Community Relations**

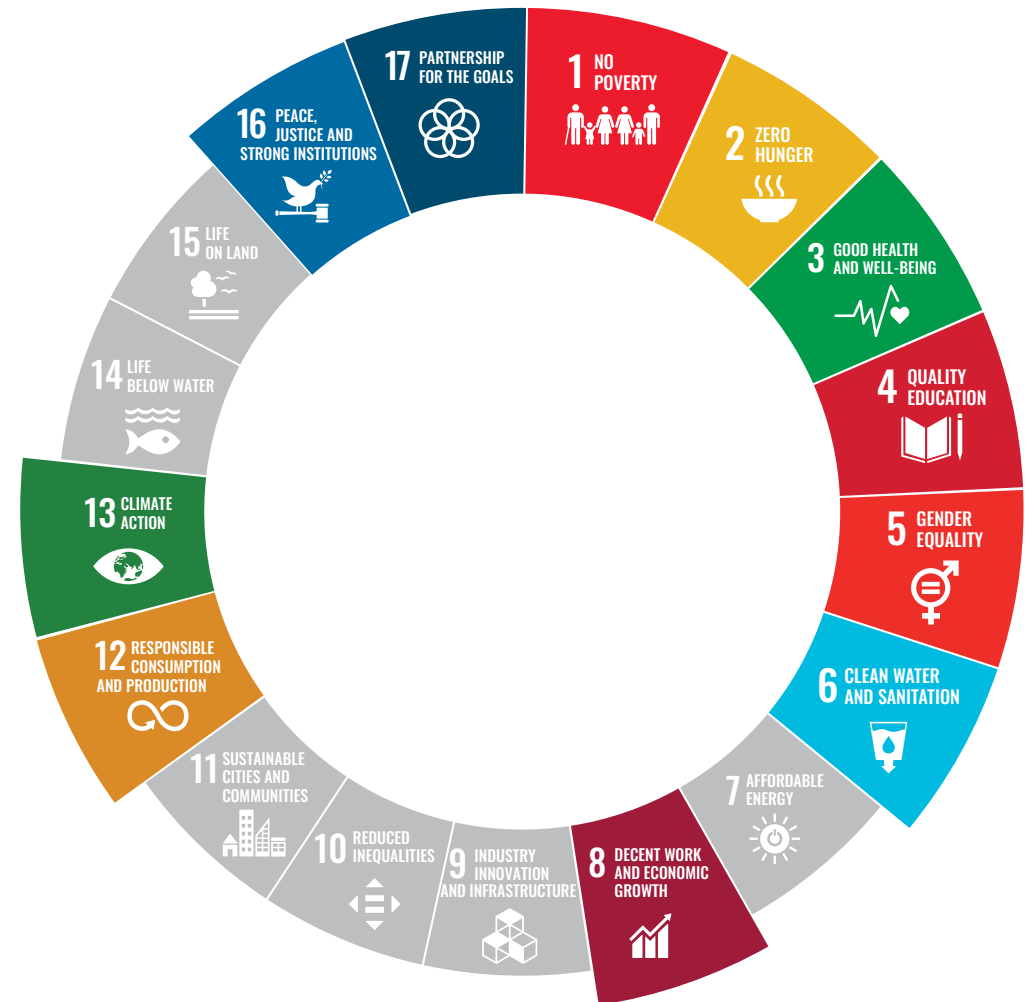
### Zero Hunger

2

**End hunger, achieve food security and improved nutrition and promote sustainable agriculture.**

- Support community initiatives aimed at increasing food security, nutrition, and sustainable agriculture.
- Through Communities in Schools, a local non-profit, 2,825 weekend meal packages were delivered in Elko County, equating to over 5,650 complete meals for students to help keep them fed on non-school days.
- Promote local consumption and facilitate market access opportunities for rural producers.

→ **Learn more: Community Relations**



## 2.5 Orla's Contribution to Sustainable Development Goals

### Good Health And Well-Being 3

**Ensure healthy lives and promote well-being for all at all ages.**

- Launch the '4X4' Safety Program to strengthen safety culture across all levels of the organization, more than doubling the average health, safety, and emergency response training per employee compared to 2023.
- Continue providing early detection exams for breast cancer, along with health guidance, to employees and community members.
- Invest in public health through the launch of our community Health Program at Camino Rojo which provided over 1,200 health consultations across our communities.

→ **Learn more: Workforce Health and Safety**

### Quality Education 4

**Ensure inclusive and equitable quality education and promote lifelong learning opportunities.**

- Support education in rural communities with a focus on kids and female youth; we provide funding to build and maintain educational and sports infrastructure in collaboration with communities and local authorities.
- At both our Mexico and Nevada projects, we offer scholarships that support students at all educational levels, from early schooling through to university, promoting continuous access to quality education.

→ **Learn more: Community Relations**

### Gender Equality 5

**Achieve gender equality and empower all women and girls.**

- 30% female representation on the Board of Directors in 2024.
- Maintain diversity and inclusion policies and programs.
- Orla respects all national and international laws designed to protect women and girls.

→ **Learn more: People Management**

### Clean Water and Sanitation 6

**Ensure availability and sustainable management of water and sanitation for all.**

- Promote sustainable water management in the areas of our operation.
- Collaborate with local communities to secure water access and efficient consumption.
- Build infrastructure that improves community water resilience, including two spillways and a retaining wall in San Tiburcio, reducing flood risk and improving rainwater harvesting for approximately 2,000 residents.

→ **Learn more: Water Management**

### Decent Work and Economic Growth 8

**Promote sustained, inclusive and sustainable economic growth, full and productive employment, and decent work for all.**

- We invest in training, uphold labour rights, and foster safe, secure workplaces. In Mexico, 81 individuals received certified vocational training across nine disciplines, supporting skill development and inclusive economic growth.
- Generate positive economic impact through wages and salaries, contracts with local suppliers, and community investments in social and economic initiatives.
- 58% of our direct employees are from local communities.

→ **Learn more: People Management, Community Relations**



## 2.5 Orla's Contribution to Sustainable Development Goals

### Responsible Consumption & Production 12

**Supporting action to ensure sustainable consumption and production patterns.**

- Minimizing emissions and energy intensity per ounce of gold are key performance indicators for our operations.
- Camino Rojo reduced its water intensity ratio in 2024, using 5.86m<sup>3</sup> of water per ounce of gold.

→ [Learn more: Climate Change](#)

### Climate Action 13

**Take urgent action to combat climate change and its impacts.**

- Continue investigating and implementing measures to improve the energy efficiency of our operations and mitigate our carbon footprint.
- Continue to better understand and build our capacity to manage climate-related impacts, risks, and opportunities.
- Adopted the UN Global Compact comprehensive training platform, allowing access to updated climate-related knowledge to all of our employees.

→ [Learn more: Climate Change](#)

### Peace, Justice, and Strong Institutions 16

**Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable, and inclusive institutions at all levels.**

- Implement policies, systems, and constant training and reinforcement to support good governance, corporate sustainability, transparency, accountability, and inclusiveness.
- Ensure each operation adopts ethical guidelines including anti-corruption, human rights protection and rule of law-based practices.

→ [Learn more: Corporate Governance and Business Ethics](#)

### Partnerships for the Goals 17

**Strengthen the means of implementation and revitalize the Global Partnership for Sustainable Development.**

- Collaborate with public and private partners for lasting community impacts.
- Through a multi-stakeholder partnership, Orla continues to support EMSaD San Tiburcio Poultry Farm—an initiative that strengthens food systems, education, and community development.
- Contribute to causes identified as community priorities, including health, education, nutrition, elder care, and environmental stewardship.

→ [Learn more: Community Relations](#)

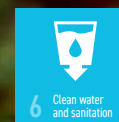






- 3.1 **Water**
- 3.2 **Biodiversity**
- 3.3 **Climate Change**
- 3.4 **Air Quality**
- 3.5 **Waste & Hazardous Materials**

OUR PRIORITY  
SUSTAINABLE  
DEVELOPMENT  
GOALS



# Environment



# 3.1

## Water

**At Orla, we understand that to maintain public support for our operations, comply with water-related permits, and be a sustainable business, it is critical that we manage water responsibly.**

Prior to commencing mining activities, we conduct assessments that consider our water needs and our potential impact on water quality and quantity. These studies inform our action plans and operating practices, including prevention and mitigation measures. An important part of our approach is to understand the water-related challenges and opportunities with other users that share the catchments with us, and to provide data transparently to decision-makers so that we positively contribute to regional water management.

One of our production sites, Camino Rojo, is situated in an area of high to extreme water stress as defined by the World Resources Institute. Higher stress indicates more competition among users, including

### Why it Matters

From exploration drilling to mineral processing, water is required for many aspects of a mining operation. Yet water is possibly the most critical sustainability challenge for any mining company simply because water is interconnected with other pressing critical issues. For instance, water scarcity and frequent storm events are linked to climate change and can impact a mining operation. Water risks to mining businesses include those related to the quantity of water used for operations and the potential impact our mining activities have on local water quality and availability.





### 3.1 Water

ecosystems, where relevant. Camino Rojo requires water for dust control, mining and crushing activities, the heap leach, process plant and laboratory activities, main camp and administration uses, and for fire fighting. Currently, the water is sourced from production wells located within the property boundary. As we mine, we need to "dewater" — to pump groundwater to ensure optimal working conditions and maximize productivity during mining operations. As we advance dewatering, we will increasingly have access to water, offsetting the need for pumping from production wells.

#### 'One Water' Strategy

Our water management strategy focuses on water conservation, minimizing waste, and protecting water quality. We use a holistic, "One Water" approach to water resource management, in which we consider the entire ecosystem of water — whether from rainfall, surface water, or groundwater — as part of a single, interconnected system. The "One Water" concept recognizes that water is a finite resource facing increasing pressures from population growth, urbanization, climate change, and pollution.

We have adopted sustainable practices such as water conservation, stormwater management, water reuse, and ecosystem restoration, and follow regional and local water management plans for freshwater consumption and waste water management to reduce upstream or downstream effects.

#### Reuse and Management

A key focus of our approach is water reuse through a closed-circuit system. Orla extracts gold using the heap leach method, which features a closed loop for the solutions used in the process and is a very efficient way to use water. Once

water enters the process, it is reused repeatedly until it either evaporates during the addition of barren solution to the heap leach pile or is bound to the ore. New water is added to maintain a constant inventory within the process.

At Camino Rojo, the processing area is the main water consumer, using over 90% of the water extracted. Camino Rojo has implemented a Zero Liquid Discharge process, which means that no contact or potentially contaminated water leaves the site. Potable water is treated by a reverse osmosis water treatment system from the





### 3.1 Water

raw water tank and stored in a storage tank to make sure the water remains acceptable for domestic uses. Water is then distributed by pumps to the camp and other facilities.

There are two sewage treatment plants next to the Camino Rojo operations camp, which handle the sewage from all camp rooms, kitchens, laundry rooms and restrooms. Sludge volume generated in the treatment plant is collected and utilized for compost production and sent to the growth media stockpiles, while the treated water is reused into the heap leaching process, reducing the use of fresh water. Waste from the septic systems of the process area, administrative buildings, and laboratory is collected in septic holding tanks and removed from the site by sanitary services.

#### Water Monitoring and Evaluation

As another layer of due diligence, we regularly monitor local water quality.

At Camino Rojo, we take water samples from production and monitoring wells and community water sources near our operation on a quarterly basis. The samples are then tested by an independent laboratory approved by the authorities against local water standards. To date, no water quality issues have been recorded. The water sampling program is jointly monitored by community members who participate actively in the sampling and are informed about the laboratory results.

Our South Railroad Project has a Water Management Plan to proactively plan and manage water through the life cycle of the mine, so that operational and stakeholder water needs are met, and that human health and the environment are protected.

#### Accountability

The Chief Executive Officer has ultimate responsibility for our water management strategy and its adoption within the Company. Water-related initiatives, policies, and strategies are approved by the Board-level ESHS Committee.

Our Chief Operating Officer is responsible for reporting risks and opportunities related to water, and ensuring the sites identify and implement practices to minimize water use and maximize efficiency.



### 3.1 Water

## Performance



**Processed water discharged in our Camino Rojo operational mine (all water is recycled and reused)**

This past year, we introduced a [Water Management Standard](#). Grounded in global frameworks, the new standard reinforces our commitment to water stewardship, stakeholder engagement, and continuous performance improvement.

Water consumption in 2024 remained relatively stable at 800,645 m<sup>3</sup>, with 100% sourced from freshwater withdrawals. Our water use intensity improved to 5.86 m<sup>3</sup>

# 0.12 m<sup>3</sup>/t

**Water use intensity (volume of freshwater consumed per tonne of processed ore)**

per ounce of gold produced, a 10.8% decrease from 2023, reflecting increased efficiency in our water use practices.

Total water recycled, all within our Camino Rojo operation, was 100%. The site had no processed water discharge to the environment.

During the year, we recorded no incidents, fines or non-financial penalties related to water usage or impacts on water quality.

## 2025 Priorities

**Monitor water uses and water quality across the mining life cycle and reinforce our water-saving campaigns across our sites.**

**Continue to support neighboring communities with monitoring campaigns to assess quality and availability of communal water sources.**





## 3.2

# Biodiversity

**Our commitment to biodiversity starts with planning ahead to identify and address any possible ecological, wildlife, and land use impacts. Orla has environmental management plans at each of our sites to ensure we monitor and protect biodiversity and comply with permit conditions and regulatory obligations. These plans cover the different stages of project lifecycles and address risks to various biodiversity elements. Our plans include monitoring wildlife, plants, and species, with a focus on species at risk that have been identified through the environmental baseline studies.**

We view partnerships as essential to good stewardship of our surrounding ecosystems. Orla collaborates with local governments, local communities, ejidos, conservation groups, and private partners to protect unique ecosystems and species around our mining properties. We also understand that

### Why it Matters

A mine's physical footprint can be significant, and poor geochemical management of waste rock can lead to serious environmental impacts, including acid rock drainage (ARD), metal leaching, and contamination of surrounding soil and water bodies. These processes can degrade natural habitats, threaten biodiversity, and result in long-term ecological damage. To prevent such outcomes, Orla implements robust waste rock management strategies, including thorough geochemical characterization, segregation of potentially acid-generating materials, and appropriate storage and treatment measures. These actions help safeguard ecosystems throughout the mining life cycle, including post-closure, and support compliance with environmental regulations and global commitments.







biodiversity and climate risks go hand in hand, so we take an integrated sustainability approach to addressing those challenges.

### Mitigation Hierarchy

Orla is committed to following the mitigation hierarchy of avoidance, minimization, restoration, and offsetting to reduce any negative impacts on biodiversity from our mining development as much as possible. We perform baseline studies during the environmental permitting phase to gather sufficient knowledge about local ecosystems and habitats.

Orla understands that mining is a temporary land use, and by minimizing

the size of our disturbance, we are being environmentally responsible in parallel with saving time and money when it comes to the required reclamation of the site. This approach brings other efficiencies, such as shorter haul distances and reduces fuel consumption. Prior to any land disturbance, we salvage soils and any protected plants, such as cactus species, with the goal of ensuring we have the materials necessary for the reclamation stage.

### Progressive Reclamation

Orla has a progressive [reclamation standard](#). Once disturbed land is at its final designed landform, we perform reclamation activities and, where necessary, we

consider offsetting by protecting areas of similar or greater habitat quality in other parts of the region in which we operate. Orla manages 13.49 ha of conservation land to ensure these ecosystems and their biodiversity components are not impacted by our activities or other activities at Camino Rojo.

Camino Rojo also maintains a nursery to grow both culturally and environmentally significant plants that are to be used in reclamation activities to enhance the ecosystems we reinstate. We also have a Closure Plan for the site, which has been approved by local governments and shared with host communities, that addresses

the final landform, vegetation types and densities, as well as habitat qualities. Under Mexican regulations by the Secretary of Environment, SEMARNAT, Orla maintains a guaranteed closure bond that assures money is available for proper guarantee of our site in the event of unforeseen circumstances. As part of our ongoing efforts, we plan to expand the botanical garden by 0.77 ha, the nursery by 0.35 ha, and significantly increase the conservation and restoration areas to 36.74 ha and 8.38 ha, respectively, further supporting ecosystem resilience and biodiversity.

### 3.2 Biodiversity

## Performance

534,096 m<sup>3</sup>

Rich soil recovered and stored for future remediation activities since operation began

357.61 ha

Total footprint of the Camino Rojo mine operation as of December 31, 2024

In 2024, we created a [Biodiversity Management Standard](#) that commits Orla to no net loss of biodiversity around our operations and enhanced site-level biodiversity planning. The standard is aligned with the mitigation hierarchy and global frameworks.

In 2024, the Camino Rojo plant nursery continued to support mining rehabilitation needs. We produced and grew an additional 6,137 plants last year (2023: 6,280 plants), all of which were grown from local seed stock. These plants are maintained and designated for replenishing lands impacted by our mining activities.



## 2025 Priorities

In partnership with Organización Vida Silvestre (OVIS), establish mechanisms for conservation and sustainability in water resources; protection, management and restoration of ecosystems and their biodiversity; and actions to counter climate change in the areas of influence, specifically in the ejidos of San Tiburcio and La Pardita.

Through an agreement with the Ministry of Water and Environment of Zacatecas (SAMA), support environmental protection initiatives, including reforestation in schools, the rehabilitation of parks, and greening of public spaces within state limits—advancing shared goals for environmental mitigation and community well-being.



**Case Study**

## Conservation project at Camino Rojo boosts wildlife in the area

**In recent years at Camino Rojo, we launched a unique project designed to protect and promote wildlife in the area. Our team built eight alternative water sources around the site for wildlife to use and drink from.**

These water systems help divert wildlife away from mining leach pads at the site (also known as heap leach facilities), attracting them to the new supplies of fresh, safe and drinkable water, which is especially important during the drought season.

Heap leach pads can pose serious health risks to wildlife that interact with these facilities, including drinking the water which may contain dangerous substances. Each system comprises a ground-level drinking pool with an exit ramp for small animals to get out easily and prevent them from drowning. There

is also a supplementary water tank next to each drinking pool that replenishes the water as needed to ensure a constant supply without emptying.

Since implementing the new water sources, we have observed – through cameras located on site – an increase in animal populations and diversity, such as bobcats, coyotes, badgers, wild boars, rabbits, and different species of birds. Through this conservation project, Orla is demonstrating our commitment to safeguard and coexist effectively with wildlife in the areas where we operate.





## 3.3

# Climate Change

**Orla is committed to reducing climate risks and being part of the climate solution, which is essential to our purpose of creating net-positive benefits for our stakeholders. We know we can do this by working with our employees, contractors, suppliers, and communities, and by embedding climate considerations into our decision-making and operations, as we endeavour to limit our GHG footprint.**

### Governance

Our Environmental, Sustainability, Health and Safety (ESHS) Committee oversees and approves climate-related initiatives, policies, and strategies. This Board-level committee ensures Orla's response to climate change is meaningful, supported with adequate resources, and in line with stakeholder expectations. Company performance, plans, and initiatives are reported by management to the Board of Directors monthly, with an in-person meeting on a quarterly basis.

### Why it Matters

To tackle the climate crisis and ensure a livable planet, enormous work and collaboration are required to reduce global greenhouse gas (GHG) emissions and support the transition to a lower-carbon economy. Gold mining – and mining in general – is a major industrial activity that generates GHG emissions, including carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O). Orla's success depends on our ability to effectively navigate and address climate impacts, risks, and opportunities.



### 3.3 Climate Change

Our [Climate Change Policy](#) outlines our commitments to addressing climate change, from understanding risks to establishing objectives and targets. Our [Indigenous Peoples Policy](#), [Responsible Procurement Standard](#), [Enterprise Risk Management Standard](#), and [Closure and Reclamation Management Standard](#) also have environmental considerations including climate change.

#### Strategy

Through our Towards 2030 Sustainability Strategy, we are building a road map to decarbonization and taking actions to minimize energy consumption and associated GHG emissions as much as possible. At the same time, we are identifying climate-related risks and opportunities and establishing plans to address them.

We believe that combatting climate change also presents opportunities for Orla. For example, at Camino Rojo we have trucks with Tier 4 engines that have automated optimization features and adjustable idle shutdown settings that reduce costs by conserving fuel. Businesses that can reduce or offset their carbon footprint may attract increased investment as investors seek to decarbonize their portfolios. Other benefits may include reduced exposure to taxes and other measures adopted by governments to decarbonize the economy.

#### Climate-Related Risk Management

Climate-related risks are captured through our Enterprise Risk Management process and fall primarily into two types: transition risks and physical risks. We continue working to better comprehend these risks for our operations, so that we can prepare accordingly.

#### Transition Risks

Transition risks are those that occur as a result of the global transition to a low- or zero-carbon economy, as countries and organizations adopt strategies, policies, laws, and tax schemes to address climate change. While these risks are becoming better understood, there is a lot of uncertainty in modelling local variations in climate and in the actions that governments or civil society will take, which poses its own risks for a reporting company.

A number of governments have introduced or are moving to introduce climate change legislation and treaties at the international, national, state/provincial, and local levels. Regulation relating to emission levels (such as carbon taxes), energy efficiency, and reporting of climate change-related risks is becoming more stringent. If the current regulatory trend continues, this may result in increased costs at some or all of the Company's operations. Orla's focus on energy efficiency and decarbonization over



#### Orla's [Climate Change Policy](#) Commitments

- Integrate consideration of climate-related risks and opportunities into our strategic planning processes.
- Adapt to the potential physical impacts of climate change and increase the resilience of our operations and projects.
- Reduce GHG emissions by promoting resource efficiency and increasing the use of renewable energy sources.
- Establish partnerships—in particular, with local communities and Indigenous peoples—in the regions in which we operate to help increase the resilience of their communities and local ecosystems to the potential physical impacts of climate change.
- Continuously improve the performance of our governance and climate change action plans based on climate change science, regulatory and voluntary frameworks, and international standards.
- Provide timely and transparent disclosure on our climate-related performance, risks and opportunities, including through this report and future reporting.
- Establish measurable objectives and, where appropriate, targets for improved environmental performance and resource utilization.

### 3.3 Climate Change

time are appropriate mitigations against transition-related risks.

#### Physical Risks

Physical risks are those that can cause disruption or damage to operations and assets. These risks can be acute (e.g., extreme weather events) or chronic (e.g., changing climate trends) and can lead to significant financial losses if not managed effectively. Orla has partnered with the climate intelligence technology company, Mitiga Solutions, to help us quantify the future exposure of our operations and our critical supply chain to natural hazards.

Following the recommendations by the International Panel of Climate Change (IPCC) and the Task Force on Climate-Related Financial Disclosures (TCFD), we considered six climate hazard categories of both acute and chronic types (namely, heat stress, precipitation risk, wind risk, drought, wildfire, and flooding) and evaluated three possible climate emission scenarios:

- SSP5-8.5: Business as Usual (BAU) — where emissions continue to rise throughout the 21st century unabated.
- SSP2-4.5: Emissions Peak in 2040 — where emissions do not increase beyond 2040.
- SSP1-2.6: Paris-aligned Scenario — where

emissions are compatible with the objectives of the Paris Agreement.

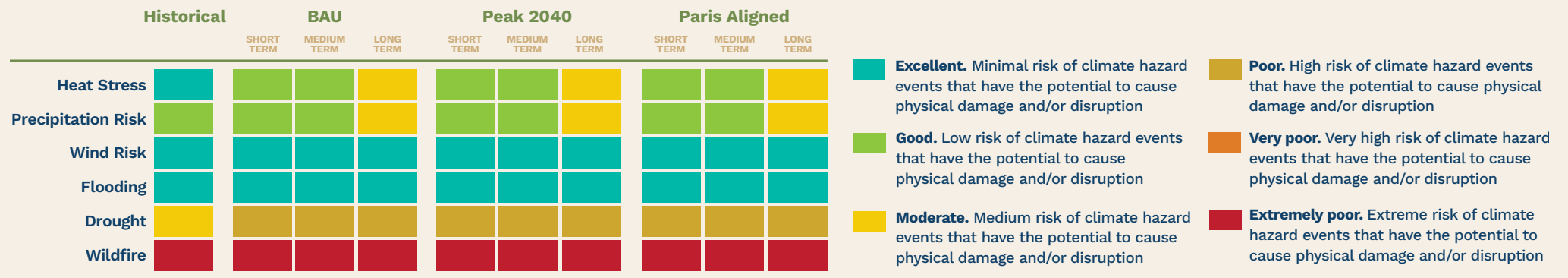
The results of our study are mapped on the diagram below, with risks categorized from minimal risks to extreme risks. As shown, wildfire, precipitation, and drought risks continued as the top concerns in the regions relevant to Orla’s operational mine and our advanced exploration projects. Historically, those three risks were considered most material to mining companies, and, based on the forecasts, will continue to be the most relevant, with a projected increase in risk level under the “Business as Usual” and “Emissions Peak in 2040” scenarios. The scenario analysis helps our teams at sites to better

understand potential changes and prepare plans to adapt, prevent, or minimize those potential physical risks.

#### Metrics and Targets

At this time, we track Scope 1, 2 and 3 GHG emissions – refer to the Performance section below for our 2024 results. As we mature our processes for identifying carbon reduction projects, as well as capturing and reporting data, we will set annual emission-reduction targets and report progress annually. We will also develop an associated road map that will show how we expect to achieve carbon emission efficiency over time.

## Orla’s Average Exposure to Physical Climate Change Risks Under Future Scenarios\*



Risks rated Moderate to Extremely Poor can be considered material risks based on Mitiga Solutions’ models

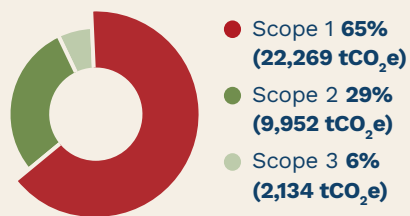
\* Scenarios determined for the direct area of influence of Camino Rojo and South Railroad



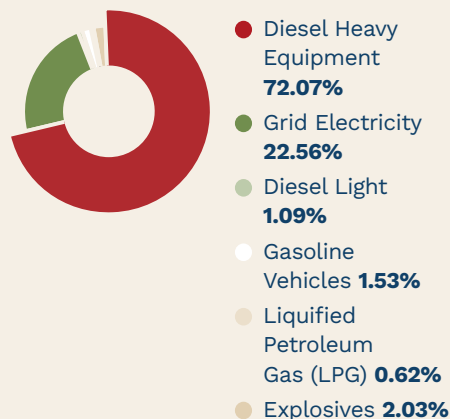
### 3.3 Climate Change

## Performance

### 2024 Total Scope 1 and Scope 2 tCO<sub>2</sub>e Emissions



### 2024 Total Scope 1 and Scope 2 Emissions by Energy Source



In 2024, Scope 1 GHG emissions (those generated by sources under our direct control) were 22,269 tCO<sub>2</sub>e. These emissions mainly originated from stationary combustion, mobile combustion, non-energy products from fuels and solvent use (e.g., lubricant use), fugitive emissions (e.g., air conditioning, explosives detonation), and land use change. Emissions were estimated using updated and representative emission factors reflecting the company's operating conditions. The results are expressed in metric tons of carbon dioxide equivalent (tCO<sub>2</sub>e), including gases such as methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O).

Scope 2 indirect emissions in 2024 totaled 9,952 tCO<sub>2</sub>e. These emissions come exclusively from grid electricity used in processes, lighting, ventilation, pumping systems, and other operational and administrative functions. To estimate Scope 2 emissions, we used the location-based approach, which considers the average emissions of the country or region where electricity is consumed.

In 2024, Scope 1 emissions increased by 32% and Scope 2 emissions by 10%, resulting in a 36% rise in total operational

GHG emissions compared to 2023. Emissions intensity rose to 0.237 tCO<sub>2</sub>e per ounce of gold produced, up from 0.196 tCO<sub>2</sub>e in 2023 — a 19% increase. This increase was primarily driven by greater fuel consumption due to longer haul distances and higher material movement, as waste and ore volumes increased and haul trucks operated from deeper pit levels.

This past year, we expanded our emissions management approach to achieve a more comprehensive understanding of Orla's climate impacts, incorporating the analysis of Scope 3 indirect emissions at the Camino Rojo site. Scope 3 emissions arise from upstream and downstream activities involving third parties essential to the company's operations.

Following the GHG Protocol – Corporate Value Chain Standard, we analyzed the following Scope 3 emission categories in 2024: employee commuting, upstream and downstream transport and distribution, business travel, and purchases of goods and services. These categories were prioritized due to their relevance to operations and data availability. Emissions were estimated using emission factors

from recognized sources such as the IPCC, DEFRA, and the EPA, among others. Primary data was used when available, and representative secondary data was applied where necessary. The work involved coordination with suppliers, contractors, and internal teams, and the use of new internal tools that facilitated information gathering and systematization.

## 2025 Priorities

**Quantify and report emissions generated by our new Musselwhite mine.**

**Continue exploring renewable and low-carbon energy sources.**

**Develop an online climate change training center for our employees and contractors.**

## Case Study

## PRO-ABC – Advancing Conservation in the Chihuahuan Desert

**The Camino Rojo Mine is located in the Zacatecas Altiplano region, a semidesert area within the Southern Altiplano of the Chihuahuan Desert- the largest arid zone in Mexico.**

This ecosystem is home to over 700 native species of flora and fauna, 20% of which are endemic and 63 are classified as at risk under national conservation standards. It also serves as a critical habitat for internationally recognized priority species such as the pronghorn, golden eagle, and black bear.

The region has long faced environmental degradation due to unsustainable land use, deforestation, overgrazing, and climate change. With limited conservation strategies in place among local communities, urgent action is needed to protect the biodiversity and ecosystem services of this unique landscape.

In response, Orla Mining launched PRO-ABC, the Action Plan for Water, Biodiversity, and Climate, to address the interconnected challenges facing the region. This three-year initiative was developed collaboratively with rural communities, civil society organizations, academia, and government agencies.

The initiative is rooted in nature-based solutions and sustainable rural development.

PRO-ABC prioritizes habitat restoration, biodiversity conservation, climate resilience, and the development of sustainable livelihoods. It focuses on addressing the region's most pressing threats, including vegetation loss, habitat

fragmentation, disruption of water cycles, and economic vulnerabilities linked to rural abandonment. The program includes working with two local ejidos to identify projects that enhance productive, low-impact livelihoods while protecting key ecosystems and species. These efforts aim not only to safeguard biodiversity but also to improve long-term social cohesion and water security.

A key legacy of Camino Rojo, PRO-ABC offers a structured, large-scale strategy that will evolve alongside the mine's lifecycle. It supports the early implementation of mine closure planning by aligning environmental investments with national and international conservation priorities, including the Sustainable Development Goals and Mexico's federal

environmental transition proposals.

One of the most important parts of the plan is how it looks at the big picture. It focuses on restoring water balance across the entire landscape by working with small watersheds in the area. It also aims to bring back species that are important to the region.

Through PRO-ABC, Orla is setting a precedent in the mining sector by integrating conservation, climate adaptation, and rural development into its Sustainability strategy. The program reflects a shared vision for a more resilient and biodiverse Zacatecas, ensuring that the mine's environmental footprint leaves a positive and lasting legacy.





## 3.4

# Air Quality

**Guided by our [Environmental, Sustainability, Health and Safety Policy](#), our Environmental Management System and our Sustainability Strategy, we have practices in place to mitigate our impacts on air quality and to meet obligations set out in our permits and environmental regulations.**

As part of our pre-mine planning and environmental baseline studies, across our sites we collect air quality data, conduct environmental impact assessments, and identify areas and processes that may potentially impact air quality. Based on these insights, we develop and implement programs to reduce the impact to the lowest extent possible.

For example:

- At Camino Rojo, air quality control systems are installed at our premises to measure and mitigate emissions.
- One of our main uses of water is for dust control and to minimize air

pollution caused by winds and dust. Dust suppression controls, such as water trucks, are used to curb dust from hauling material on gravel roads. Where feasible, roads are paved to eliminate dust emissions altogether.

- We maintain a modern fleet of vehicles that we service routinely to ensure they operate efficiently. The vehicle engines have pollution controls to minimize particulate matter emitted and are compliant with Tier 4 standards, which emit up to 90% less particulate matter and NOx compounds.

### Air Quality Monitoring

Our site-level teams closely monitor the performance of our operations on air quality. For example, Camino Rojo has an ongoing air quality monitoring program in local communities, and South Railroad completed a study that indicates limited air quality impacts that appear to be within State of Nevada standards. This due diligence

### Why it Matters

Addressing Orla's impact on air quality is essential for meeting our social license to operate and living up to our purpose to transform resources into a net-positive benefit for all of our stakeholders. The mining industry's potential impact on air quality, from activities that produce dust or gaseous emissions, is both a local and global issue. For clarity, this section refers to non-GHG emissions resulting from our activities, the most significant of these emissions being sulphur oxides (SOx), nitrogen oxides (NOx) and particulates. For details about Orla's GHG emissions, please refer to the Climate Change section.



### 3.4 Air Quality

helps prevent worker health, public health, and the environment from being adversely affected by poor air quality, while ensuring Orla complies with mandatory air quality standards.

At Camino Rojo, we use sophisticated monitoring instruments that measure total dust, as well as particulate dust matter of a size less than 10 microns (PM10)<sup>1</sup> and 2.5 microns (PM2.5), at designated monitoring stations. This regular assessment helps us understand air quality at neighboring communities and our boundaries. We

also monitor the chemical characteristics (such as metals) of the captured dust. We use meteorological data to identify areas upwind and downwind from our site to ensure that we can differentiate dust from the site and dust created from other regional activities.

In our South Railroad Project, air pollution control measurements are part of our environmental permitting applications and site environmental management plan.

Orla's local teams also engage with and listen to community members, including through our community response mechanism, to identify and respond to any concerns or complaints related to air quality and pollution across our operations.

#### Accountability

The Chief Executive Officer has ultimate responsibility for overseeing Orla's management of, and impact on, air quality. The ESHS Committee of the Board reviews any issues raised related to air quality

and approves mitigation measures. Our Chief Operating Officer is responsible for reporting identified risks and opportunities related to air quality, and ensuring the sites identify and implement practices to preserve or improve air quality. In addition, each operation is responsible for implementing programs and procedures to protect air quality.

<sup>1</sup> The PM10 fraction of dust (dust less than 10 microns in diameter) is the inhalable fraction that is emitted from dusty roads, vehicle exhausts, and some industrial processes and can impact respiratory and cardiovascular systems if not managed.





### 3.4 Air Quality

## Performance

# Full compliance

with relevant air quality regulations

# 7.43

tonnes of NO<sub>x</sub> emissions

# 1.36

tonnes of CH<sub>4</sub> emissions

In 2024, Orla launched an [Air Emissions and Noise Management Standard](#) aligned with global frameworks. We are committed to controlling emissions, minimizing community and environmental risks, and meeting or surpassing regulatory requirements in all of our exploration, development, and operation activities.

Continuous monitoring of air quality around our sites continued in 2024, as we use real time data and ongoing research

to assess all environmental emissions produced by our activities. The results demonstrated compliance with relevant air quality regulations. There were no incidents or concerns related to air quality in 2024.

During the year, our operations generated minor quantities of nitrogen oxide (NO<sub>2</sub> emissions = 7.43 tonnes) and methane (CH<sub>4</sub> emissions = 1.36 tonnes).

## 2025 Priorities

Continue to monitor the impact of all emissions on air quality surrounding our sites.



## 3.5

# Waste & Hazardous Materials

**Our objective is to minimize all forms of waste generated by our operations and to manage it responsibly. We look for new opportunities to reduce waste, incorporate circular economy approaches, and extend the life cycle of the products we use.**

### Waste Rock

As part of the environmentally safe management of our waste rock (rock removed from a mine that has no economic value), we identify the short- and long-term risks associated with its storage, including chemical risks such as the risk of metal leaching and acid rock drainage (ARD).

Once we understand the nature and magnitude of the risk, we store the waste rock in specially designed storage facilities based on a waste rock management plan and industry best practices, in order to prevent water contact and mobilization of contaminants.

We also capture any rainfall that contacts waste facilities to prevent migration into the surrounding environment and maintain the geotechnical stability of our waste structures by having them designed and regularly inspected by qualified geotechnical staff and third-party experts.

### Hazardous Materials

Through our Environmental Management System, we have programs in place to manage and mitigate all non-mineral waste and hazardous materials across our operational mines and exploration projects.

At Camino Rojo, for example, we use standard industry practices in the transport, storage, and use of various chemicals required for mining and processing. For explosives and cyanide in particular, there are strict regulatory requirements that must be met. All non-mineral waste generated by the site is collected and transported to the on-site

### Why it Matters

Responsible management of waste and hazardous materials is critical to protect people and local ecosystems, while reducing risk and environmental liability for our business. Gold mining uses and generates both waste and hazardous materials, which vary depending on the type of mine and operations.





### 3.5 Waste & Hazardous Materials

waste management centre where it is further sorted into hazardous and non-hazardous waste.

Orla complies with all permits and relevant regulatory requirements as a part of everyday operations. The Camino Rojo Hazardous Waste Management Plan was approved by the environmental authority, SEMARNAT in Mexico City. Every year, the operation reports waste management results to the environmental authorities. We conduct inspections and audits to ensure we adhere to our internal standards and regulatory requirements.

Our Camino Rojo site maintains all necessary permits and licenses from the relevant authorities, including the Secretaría de la Defensa Nacional (SEDENA), related to the transport, storage, usage, and disposal of waste, and hazardous materials. Our operational practice is aligned with the International Cyanide Management Code (ICMC) to guide our transport, storage, and use of cyanide in terms of public safety, worker health and safety, and environmental stewardship.

#### Training and Reporting

We educate our workforce about different types of waste, ways to responsibly manage it, and how to report any environmental incident including spills. Additional training is provided to employees that use hazardous materials, to ensure their safety as well as understanding of the environmental risks associated with the various chemicals used.

#### Accountability

The Chief Executive Officer has ultimate responsibility for our environmental management and performance. Waste management initiatives and strategies are approved by the Board-level ESHS Committee. Our Chief Operating Officer is responsible for reporting identified risks and opportunities related to waste, and ensuring the sites identify and implement practices to minimize waste and handle it responsibly.



### 3.5 Waste & Hazardous Materials

## Performance

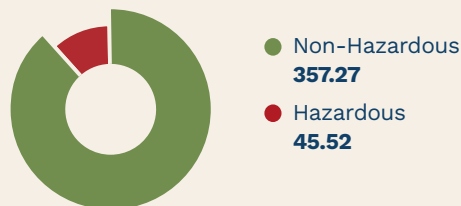


**fines or penalties** related to hazardous materials or chemical spills

**1.12**  
**w:o strip ratio**

the amount of **waste material** that was moved to extract a given amount of ore

**Camino Rojo Non-Mineral Waste**  
(in tonnes)



## 2025 Priorities

Undertake an applied research project to develop a low carbon cementitious mix design and processes using waste from Orla's Camino Rojo mine, with the goal of reducing emissions, promoting circularity, and supporting low-emission construction both on-site and in neighboring communities.

To strengthen our commitment to environmental protection and ensuring that hazardous materials are safely managed throughout the life cycle of Orla's operations, we introduced a [Hazardous Materials Management Standard](#). The standard was been informed by the International Cyanide Management Institute (ICMI) Cyanide Code, the World

Gold Council's Responsible Gold Mining Principles, and the Mining Association of Canada's Towards Sustainable Mining Protocols.

During 2024, we tracked and disposed 19.08 tonnes of hazardous chemical residues according to regulatory requirements.

## Waste Rock Indicators at Camino Rojo

WASTE ROCK	2024	2023	2022
Waste Generated (tonnes)	8,563,535	4,161,591	5,535,125
Intensity (tonnes generated / tonnes ore mined-strip ratio)	1.12	0.56	0.67
Intensity (tonnes generated / tonnes ore processed)	1.23	0.61	0.84
Intensity (tonnes generated / ounces gold produced)	62.63	34.15	50.50
Daily Stacking Rate – Average (tonnes per day)	19,055	19,194	18,251





#### 4.1 Workforce Health and Safety

#### 4.2 People Management

#### 4.3 Community Relations

#### 4.4 Human Rights

#### OUR PRIORITY SUSTAINABLE DEVELOPMENT GOALS



# Social

## 4.1

# Occupational Health & Safety

### Zero Harm to Our People

**Providing a healthy and safe work environment for our people is Orla's top priority and essential for our sustained success in the long term. Safety goes beyond just rules and procedures that we follow; it's a core value that guides our everyday actions and decisions.**

At Orla, our commitment to health and safety starts at the highest levels of leadership. Our goals are established by our top executives, and to ensure effective health and safety performance, all related initiatives, strategies, and resources undergo review and approval by the Environmental, Sustainability, Health and Safety (ESHS) Committee of the Board.

Our [Environmental, Sustainability, Health and Safety Policy](#) outlines our commitment to maintaining a safe work environment. This policy is incorporated

into employee orientation and contractor information packages and is posted on our website and at all sites alongside other safety regulations and signage. Through our systems, employee practices, and the consistent use of symbols (such as everyone wearing their complete personal protective equipment onsite), we provide a safe environment and experience for our employees, contractors, site visitors, and other stakeholders.

### Health and Safety

To uphold our commitments and ensure good performance, we have implemented a Health and Safety (H&S) Management System guided by leading international standards, such as ISO 45001 for occupational health and safety, Towards Sustainable Mining (TSM), and regulatory frameworks in the jurisdictions where we operate.

### Why it Matters

The health and safety of our people is fundamental in every aspect of our operations, influencing all areas and functions of our business. While mining inherently entails high-risk processes, including the use of explosives, operation of heavy machinery, work at elevated heights, and handling cyanide and other chemicals, we firmly believe that occupational injuries and illnesses can be prevented through sound, safe work practices, ongoing risk management, and fostering a safety-first mindset among our workforce.





#### 4.1 Occupational Health & Safety

Our health and safety approach includes the following components:

- Identifying, measuring, and mitigating or eliminating potential health and safety hazards and risks prior to any work taking place.
- Delivering safety training, instruction, and ongoing awareness-building so everyone in the workplace understands their responsibilities and can perform their duties safely and effectively every day.
- Providing appropriate safety equipment and signage.
- A hazard reporting process.
- Tracking and investigating incidents and near-misses.
- Taking corrective actions to remove hazards, decrease risk, and ensure key learnings are integrated across our operations so that the potential for future occurrence is minimized or eliminated.
- Measuring performance using workplace inspections and audits, as well as employee feedback.
- Maintaining a work environment free from discrimination and harassment.

#### Shared Responsibility

Health and safety is a shared responsibility, and we empower not only our people but also our contractors and business partners to cultivate, share, and take ownership of a safety-centric culture.

At the heart of this effort are our joint Occupational H&S and Emergency Management Committees, which are comprised of elected members representing various site departments, managers, both unionized and non-unionized employees, and contractor representatives. Led by our general managers, these committees foster employee engagement in health and safety discussions and planning, providing a platform for sharing ideas and feedback.

The ultimate goal is to enhance or resolve H&S issues within our workplace. While we recognize that it's impossible to eliminate all occupational risks, through proactive risk management and robust safety practices we continuously aim to minimize and control these risks so that we protect our people and our business.

### Orla's Health and Safety Approach



#### 4.1 Occupational Health & Safety

## Performance

# 106

**Average hours of health, safety, and emergency response training for employees**

# 36

**Average hours of health, safety, and emergency response training for contractors**

Across all sites, there were a total of 41 injuries in 2024, up from 22 the previous year. Incidents requiring medical intervention apart from simple first aid (“total recordable incidents”) decreased from seven in 2023 to two last year. We recorded a Lost Time Injury Frequency Rate (LTIFR) of 2.59 (2023: 1.71). LTIFR measures lost time injuries per 1 million person-hours worked. In 2024, at our main operation, Camino Rojo, there were seven lost time injuries, which resulted in a Lost Time Injury Frequency Rate (LTIFR) of 3.94. Orla has not experienced any employee fatalities since the Company’s inception.

Health, safety, and emergency response training is part of our ongoing effort to foster a safety-first mindset across our workforce. Over the course of 2024, employees and contractors completed 33,047 hours and 12,600 hours, respectively, of training related to health, safety, and emergency response. There was a 116% increase in the average hours of H&S training for our direct employees. The training covered topics such as mining industry safety standards and regulations, protective equipment, safety procedures, emergency preparedness, cyanide management, and disaster prevention related to chemical contamination.

Demonstrating proactive leadership, Orla launched the internal “4X4” Safety Program in 2024. The program is designed to engage all organizational levels—leaders, middle management, supervisors, and operators—across four core safety activities: face-to-face walkthroughs, incident investigations, regulatory compliance, and training.

To further foster a culture of prevention, the site hosted its Second Health and Safety Fair, bringing together employees and contractors to emphasize accident and illness prevention. The event showcased joint efforts to maintain a safe work environment and reinforced a shared responsibility for worker health—establishing Camino Rojo as a positive example within the industry.

In recognition of its continued commitment to workplace health and safety, Orla Camino Rojo was awarded its second ELSSA Distinction by the Mexican Social Security Institute (IMSS) in Zacatecas. The distinction affirms compliance with national safety standards and highlights the efforts of companies that prioritize employee well-being. This achievement positions Camino Rojo as a regional leader and sets a benchmark for safety in the mining sector.

As Chair of the Safety and Health Committee of the Zacatecas Mining Cluster, Orla Camino Rojo also contributed to regional progress by promoting best practices in health and safety. Key outcomes included 53 training sessions, implementation of digital STPS tools, development of civil protection plans, psychosocial risk assessments, and the first National Conference on Mining Safety and Health. These efforts reflect a strong commitment to safe operations, continuous improvement, and shared value across the mining sector.

## 2025 Priorities

**Strengthen and embed the 4X4 Safety Program across all levels of the Camino Rojo operation.**

**Leverage new technologies to enhance safety and health practices.**

**Achieve certification of the occupational health and safety management systems at Camino Rojo.**



## 4.2

# People Management

### Collaboration at All Levels

**Our primary goal from a human resources perspective is to foster a culture where employees want the company to succeed. This means creating an environment where employees genuinely want to work with us and contribute to Orla's success in a safe and sustainable manner. It also means they recognize that when we succeed, they do as well.**

We place strategic emphasis on planning, developing, and optimizing our human capital. We consistently invest in our people strategy, addressing all facets of the employee experience – from recruitment, onboarding and development to performance management, compensation and career planning, cultivating a positive workplace culture free from discriminatory and unfair behaviours.

Our “People Systems” are designed to enrich our culture and create a workplace that instills a desire to contribute to our collective success.



**“What do you want me to do?”**

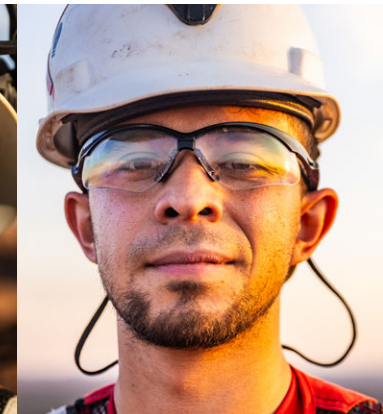
PREPARATION FOR A SUCCESSFUL START

### Recruitment and Selection

We have a decentralized structure, with a small corporate team that develops policies, systems, and procedures to direct our work, guiding our site leaders and aiding them to be successful through sound knowledge, advice, mentorship, and sharing the workload. Our site teams have full accountability for all aspects of the business at each site, empowered by our corporate leaders. We have multiple levels of work, all of which have different levels of complexity, accountability, and vision, contributing to our success.

### Why it Matters

Our employees represent a vital group of stakeholders, whose expertise and skills are essential for the effective operation of our Company. It is therefore crucial that we remain committed to their safety, well-being, and development to keep them engaged with Orla for years to come.



## 4.2 People Management

At Orla, we believe the entire hiring process is strategically important, from crafting clear role descriptions to facilitating the identification of ideal candidates and supporting the selection process. 'Role Description' and 'Recruitment and Selection' are integral components of our ongoing effort to meet workload demand and find the right people for the right roles, at the right time. We prioritize compliance with all relevant employment laws and strive to prevent any form of discrimination throughout the recruitment process.

Orla prioritizes local hiring as much as possible for our operations. We also prioritize internal growth and

development. When we are unable to find the necessary talent within the Company and within the local labour market, we recruit employees or contractors from beyond the surrounding communities.

Our sites engage with students to help promote careers in mining and ensure that Orla attracts top talent and a sufficient volume of applications to fill vacancies. For example:

- In Mexico, we partner with academic centres and innovation hubs to promote industry practices to future professionals, mainly in mining, processing, and environmental areas.
- We collaborate with educational institutions in Mexico to support

scholarships and cooperative (co-op) education programs, which allow students to apply their knowledge to an on-site job. Several participating students have transitioned from school to work at our sites.

- At our South Railroad Project in the United States, we provide scholarships to Elko County high school seniors and provide summer internships for local young talent to build a pipeline for future permanent roles.

### Onboarding and Induction to the Role

To help new staff settle in, feel part of the Orla team, and position them for success, we have a detailed onboarding and induction program. It includes providing

new employees with clear information about the company, our HSE and People Systems, benefits, their team leader's expectations about the work they need to do, and relevant information so they have every available tool to succeed. We also conduct regular check-ins to confirm that the onboarding process is going well.

All new employees are provided with a suite of organizational policies and standards, including the following, to guide worker behaviour and promote a positive, inclusive work environment:

- [Anti-Bribery and Anti-Corruption Policy](#)
- [Code of Conduct and Ethics](#)
- [CSR Policy](#)

## Orla's People Management System

Our 12 People Systems are organized around three questions that every employee, at some point in their career at Orla, will need answers for.

We design our systems with a global application mindset that takes into consideration the reality of each jurisdiction.

What do you want me to do?		Organizational design (structure and levels of work)	Role descriptions	Recruitment & selection	Onboarding & offboarding	Induction to the role
How am I doing?		Compensation and benefits	Performance management	Fair treatment	Discipline	Removal from role
What is my future?		Learning & development	Succession & career planning			



## 4.2 People Management

- [Diversity Policy](#)
- [Environment, Sustainability, Health and Safety Policy](#)
- [Reporting and Investigation Procedures](#)
- [Workplace Bullying and Harassment Policy](#)



**“How am I doing?”**

OPTIMIZING PERFORMANCE

To compensate and incentivize our team members, we offer competitive salaries and benefits that align with the standards of the mining industry in each country where we operate. We provide employees with clear information about their wages, working hours, and entitlements to benefits or bonuses, and payments are made in a timely and accurate manner. We set performance goals, measure and assess our employees against these goals, and provide feedback to help them grow and be successful at their work.

### Diversity and Inclusion

At Orla, we are dedicated to cultivating a workplace culture that embraces and uplifts all individuals, regardless of their gender, age, ethnicity, nationality, sexual preferences, or religious background. We deeply respect and value the different perspectives, experiences, and cultures that our diverse employees bring to the table and recognize the numerous advantages that stem from diversity within our workforce and Board.

These include access to a wider pool of top-tier talent, enhanced employee retention, exposure to diverse perspectives and innovative ideas, and the ability to harness the full spectrum of available talent.

We recruit, retain, reward, and develop our people based upon their abilities, merits, and contributions. To create an inclusive culture, we endeavor to:

- provide equal access to opportunities, including training and development, for all employees;
- respect and protect human rights, labour rights, and cultural heritage; and
- maintain policies and procedures to prevent discrimination and harassment.

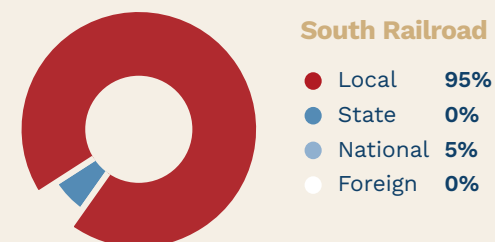
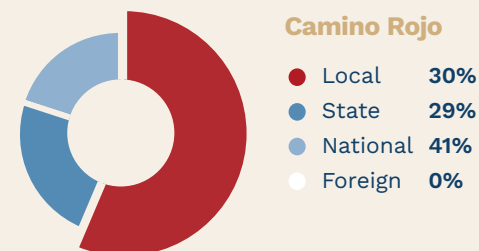
Management at Orla is tasked with implementing our [Diversity Policy](#) and overseeing diversity and inclusion initiatives, ensuring compliance with all labour regulations throughout the Company.

We are committed to establishing a diverse and inclusive supply chain and are actively working towards ensuring that our suppliers are compliant with our policies. Additionally, we prioritize purchasing from a wide array of sources, including minority-owned businesses and underrepresented community groups, as part of our commitment to promoting diversity and inclusion across our operations.



## 2024 Distribution of Employment by Area of Origin

Includes Direct and Indirect employees



## 4.2 People Management

### Labour Rights and Employee Relations

Orla cultivates direct relationships with our employees based on principles of fairness and respect. We are committed to upholding the fundamental right of employees and contractors to associate and collectively negotiate labour agreements with their preferred unions. Our objective is to foster positive labour relations by collaborating closely with our employees and their unions – and our commitment to employees is to have a productive and healthy working environment free of unwanted and unfair behaviors. As such, we have designed the Fair Treatment system to effectively resolve a team member’s concern about perceived unfair treatment in the workplace by their team leader. This avenue is available to every employee, should they have a concern.



### “What is my future?”

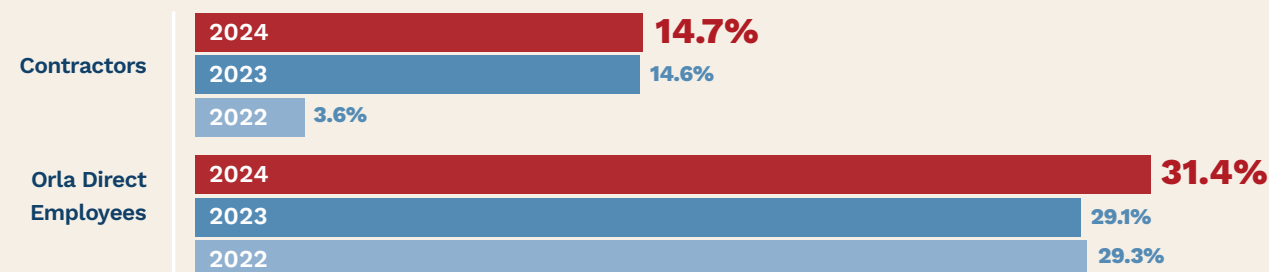
#### LEARNING AND DEVELOPMENT

Orla is deeply committed to supporting the success of our people and maintaining a skilled workforce – our objective is to enable our people to reach their full potential and drive the continued success of our organization. To achieve this, we offer comprehensive training and development programs, including opportunities for job related education and retraining, coaching, career, and succession planning. Our key training themes encompass safety and health, emergency response, leadership, job-

## Employment Breakdown by Gender, Type, Location, and Age

Across all sites and corporate

### Breakdown of Female Employees by Type



### Employment Type

Direct only



- Full time **86%**
- Part time **14%**

### Employment by Location

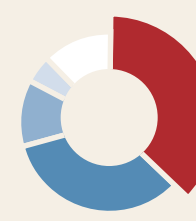
Direct only



- Mexico **86%**
- United States **4%**
- Canada **8%**
- Panama **2%**

### Employment by Age

Direct only



- 18-24 **14%**
- 25-34 **36%**
- 35-44 **31%**
- 45-54 **13%**
- 55-64 **6%**



## 4.2 People Management

related skills enhancement, and other social skills that are key for their development.

We are committed to investing in our people so they remain invested in us. The demands placed on leadership are evolving, and shaping leaders who embody empathy, engagement, and motivation is essential to thrive in today's workforce. We are focused on offering leadership training and development tailored to our desired work environment, culture, and expectations, equipping our leaders to promote a workplace where every employee is inspired to contribute to the Company's success.

Our LEAD program showcases our evolving approach to enhancing leadership skills at Orla. Introduced in 2023, the

program is fully designed in-house and is custom-tailored to our needs, our distinct organizational context, and cultural intricacies. We have trained a pool of internal facilitators that partner with external trainers in social skills and leadership work bodies like Systems Leadership, our main Framework. The program is delivered in three phases:

### 1. Leadership Foundations Phase:

- Provides a suite of tools and models for team leaders to enhance their leadership skills and interactions with team members.
- Uses a common subject language that is shared and understood across the organization.

### 2. Skills Development Phase:

- Reinforces the technical, social, and commercial skills for our leaders to help them excel.
- Examples of these skills include finance, effective communication, emotional intelligence, and understanding our operations.

### 3. Continuous Learning Phase:

- Enables team leaders to learn from each other through an internal learning network.
- Facilitates the sharing of expertise and experience in dealing with a wide variety of situations.

## Workforce as of December 31, 2024

All mine sites, excluding corporate

EMPLOYMENT	LOCAL COMMUNITIES	STATE	NATIONAL	FOREIGN	TOTAL	% OF LOCAL EMPLOYEES	HOURS WORKED
Direct employees by Orla	190	74	62	1	327	58%	81,828
Indirect employees and contractors	47	137	238	1	423	11%	64,730
<b>Total</b>	<b>237</b>	<b>211</b>	<b>300</b>	<b>2</b>	<b>750</b>	<b>32%</b>	<b>146,558</b>



## 4.2 People Management

### Performance

100%

Direct employees  
at Camino Rojo from Mexico

As of December 31, 2024, our workforce comprised 354 employees, up from 327 the previous year. We promoted 70 employees reflecting our commitment to advance internal candidates. Orla also had 425 contractors, compared to 288 in 2023. No management functions were performed by a contractor.

Women represented 31% of our employee population last year and 11% of our corporate executive management team.

In addition to health, safety and emergency response training, we delivered on average 14 hours of training per person in 2024, compared to 12 hours the previous year, and invested heavily in training across the organization. Training topics ranged from leadership to Orla's corporate policies.

During the year we continued to deploy our "People Systems", which is focused

31%

Total female representation  
across our workforce

on three themes or pillars for structuring and delivering our human resources programs, ranging from recruitment and selection to performance management to succession and career planning. Implementing a fair treatment system was a key focus in 2024.

In 2024, 55% of our workforce was represented by a union. At Orla, we deeply value and respect the rights of all our employees, including their freedom

\$22.1M

Paid in salaries to direct employees

to choose whether or not to associate with a union. We are committed to maintaining a neutral and supportive stance, working collaboratively with union-represented employees through their chosen representatives, and equally supporting non-union employees to ensure fair and respectful working conditions for all. Our focus remains on fostering a positive, inclusive work environment where everyone can thrive.

### 2025 Priorities

Continue with LEAD and incorporate Musselwhite team leaders into the program.

Complete integration of Musselwhite workforce and human resources; transition benefits, services, and support work considering Orla's decentralized approach.

Finalize implementation of People Systems company-wide.

Design the 'Towards 2030 People Strategy'. This strategy stems from our Towards 2030 Sustainability Strategy and aims to provide the right Human Resources infrastructure to support Orla's growth and to achieve all people related metrics included in the Sustainability Strategy.

#### SPOTLIGHT

#### Building leadership excellence

For the second consecutive year, we delivered our LEAD Program, reinforcing our commitment to leadership excellence. Through hands-on workshops and networking sessions, the program strengthens our team leaders' skills, expands their perspectives on people matters and deepens understanding of Orla's operations. Whether meeting in person or virtually, leaders have opportunities to interact with other team leaders across various countries and build meaningful connections.





## 4.3

# Community Relations

### Making a Positive Contribution

At each of our sites, we maintain active community relations programs with dedicated budgets and initiatives. Our community and social framework is outlined in various governance documents, including our [Code of Business Conduct and Ethics](#), [Environment, Sustainability, Health and Safety Policy](#), [Human Rights Policy](#), [CSR Policy](#), [Indigenous Peoples Policy](#), and [Stakeholder Engagement and Community Response Standard](#).

### Pillars of Our Approach

#### Community Engagement

Orla is committed to promoting open and trusted relationships with communities. This involves active engagement with local government, Indigenous groups, community leaders, environmental organizations, and private and communal landowners, to make sure their perspectives are valued and

### Why it Matters

Mining companies like Orla have a civic responsibility to uphold and contribute to the sustainable development and welfare of the communities in which they operate and upon which they rely. This obligation extends to foreign countries as well as rural and remote areas, requiring a respectful consideration of local traditions, customs, and beliefs, including those of Indigenous Peoples.

Meaningful engagement with local communities, characterized by transparency and incorporation of their perspectives, is crucial for fostering positive, trust-based, respectful relationships which are the basis for building long term value together.



### 4.3 Community Relations

considered in our operations. We prioritize soliciting and integrating their input into our decision-making processes and plans, thereby demonstrating our commitment to conducting our operations in a socially responsible manner. At our producing mine, Camino Rojo and our project in Nevada, we have established full-time community relations teams. These teams are guided by Orla's [CSR Policy](#) and [Stakeholder Engagement and Community Response standard](#). Each site has its own community relations program tailored to local priorities. At Camino Rojo, this includes a formalized community response mechanism to receive, document, and address community aspirations and concerns.

#### Social Investment

Orla is dedicated to supporting and enhancing the well-being and quality of life within communities where we operate. We do this through various means such as sponsorships, donations, event and program support, volunteerism, and in-kind services.

We actively seek community input to identify and prioritize the allocation of resources that Orla commits to social investing in each year. For instance, at Camino Rojo, we engage with ejidos to gather their perspectives. Each year Orla provides funding for various initiatives, including education, healthcare services, and job and business creation. We also support local infrastructure development,

which encompasses projects such as road maintenance, water collection systems, and irrigation systems, all aimed at improving the overall livelihoods and prosperity of the communities we serve.

#### Economic Development

Another key aspect of Orla's strategy is to foster economic opportunities for local communities, with the goal of creating a positive economic impact in the region and facilitating sustained community development beyond the closure of our mines. To achieve this objective in Mexico, we have forged partnerships with the State of Zacatecas, the Mexican Centre for Competitiveness (CCMX), Center of Scientific and Technological Studies of Zacatecas (CECyTEZ), Engineers Without Borders Canada, and private allies. Together, we are working to enhance the entrepreneurial capacity, market access, and diversification of local business owners, with a particular focus on supporting women in communities near Camino Rojo. In Nevada, we are working with local organizations to establish partnerships that will allow us to further contribute to the development of economic diversification projects.

Through these collaborative efforts, we aim to empower local economies, promote resilience, and contribute to long-term value creation and sustainable development in the regions where we operate.

## Orla is committed to:

### Developing meaningful and effective community relations strategies

Encompassing all relevant stakeholders and rightsholders integrating community relations best practices into our business processes.



### Engaging with the people who live and work in our neighboring communities

Identifying local priorities, needs, and development goals.

### Establishing grievance mechanisms, based on international best practices



### Developing, implementing and investing in socio-economic initiatives

Supporting the development and sustainability of communities and countries in which we operate.



### Partnering with credible organizations

Working with organizations including non-governmental organizations and local community groups to leverage resources and build capacity.





### 4.3 Community Relations

#### Human Rights and Indigenous Peoples

Our dedication to respecting and safeguarding the rights of all individuals impacted by our operations is clearly outlined in our core policies, standards, and procedures, especially our [Human Rights Policy](#). Part of our commitment includes providing safe working conditions and mitigating any adverse impacts our operations may have on local communities.

For further information, please refer to the Human Rights section for a comprehensive understanding of our approach.

Our [Indigenous Peoples Policy](#) focuses on nurturing positive and trust-based relationships with Indigenous communities based on respect and open dialogue. The policy recognizes the importance of Reconciliation, and Orla is dedicated to working in partnership with Indigenous

Peoples to establish mutually beneficial relationships.

Meaningful engagement, capacity-building strategies, and the incorporation of Indigenous knowledge and culture into our operations are just some of the ways we strive to ensure long-term sustainability and cultural sensitivity. Our team in Nevada is engaged with the Te-Moak Tribal Council to

share the project plan for the future and the opportunities for proactive collaboration.

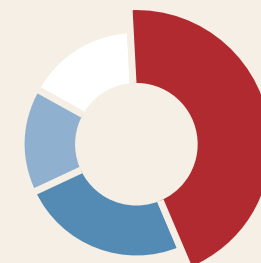
#### Transparency and Public Disclosure

We are committed to transparency with our local stakeholders. We proactively engage in community meetings and consultations, and publicly disclose information regarding our operations, financial results, tax payments, and ESG performance.



### 2024 Direct Economic Impact in Camino Rojo Local Communities

IN \$US	2024	2023	2022
Salaries paid to employees from direct local communities	\$ 4,794,288	\$ 5,271,160	\$ 1,551,679
Permits, concession, and land compensation to ejidos	\$ 2,616,600	\$ 2,525,846	\$ 2,601,753
Investment in local communities and donations	\$ 1,623,850	\$ 1,579,078	\$ 1,447,543
Payments to suppliers from direct local communities	\$ 1,712,074	\$ 1,294,241	\$ 766,154
<b>Total investment in local communities</b>	<b>\$ 10,746,813</b>	<b>\$ 10,670,324</b>	<b>\$ 6,367,129</b>



**Camino Rojo**  
**\$10.7 million**

#### 4.3 Community Relations

## Performance

# US\$10.7M

Direct economic impact in communities of influence at Camino Rojo

# US\$9.6M

Spent on goods and services for our Camino Rojo mine from suppliers based in Zacatecas, Mexico

### Camino Rojo

During the year we supported various community healthcare initiatives. For example, our Camino Rojo operation funded breast cancer screenings for 107 women from the communities of San Francisco de los Quijano, El Berrendo, San Tiburcio, La Pardita, Cerritos de Jesús, Brendy, and La Fábrica. Our onsite medical team in Camino Rojo also provided almost 1,300 free appointments to citizens in the same communities. These medical sessions involved preventive healthcare talks, first aid training, and discussions on other health issues.

Orla also invested in a community beautification campaign in San Tiburcio, Mexico. We provided over 100 families with supplies to paint the façades of their homes, contributing to the beautification of their neighborhoods and nearby public spaces. As part of this initiative, the first playground and recreational facility for the community was constructed, which is now being used by approximately 100 kids a day. The facility has an outdoor gym, multi-purpose playing fields, kids playgrounds, reforestation areas, picnic

## Awards

Orla Mining was voted a top three favourite for Best Mining Company in the Elko County Readers' Choice Awards.

Created over 10 years ago, the recognition program allows community members to nominate and vote on their favorite businesses in many different categories, including mining, arts and culture, community, and more.



areas, sidewalks, and pedestrian streets. Orla contributed funds over a two-year period to support the campaign.

In 2024, Orla provided 200 scholarships to Mexican ejido students from local communities around Camino Rojo. The scholarships are distributed every six months to students spanning the elementary, secondary, high school, and university levels, helping to fund their education and learning supplies.

Through our partnership with the Institute for Vocational Training in the State of Zacatecas (ICATEZ), Orla supports vocational training services for people in our communities of influence. The training is provided in the "Las Bodegas" Community Centre, which was restored by our Orla

Camino Rojo team. In 2024, 81 people benefited from vocational training in areas such as hairstyling, embroidery, baking and confectionary, cosmetics, and construction.

### South Railroad

Demonstrating their commitment to volunteerism and making a hands-on positive impact, in 2024 the Orla South Railroad team partnered with two local organizations to help fight hunger in Elko County: Communities in Schools (CIS) of Northeastern Nevada, whose goal is to help students graduate, and Friends in Service Helping (FISH), an organization that provides food packs with fresh vegetables and fruit, bread, and protein items to community members in need.



### 4.3 Community Relations

To support CIS' food hunger program, every other week Orla volunteers help to provide over 5,650 meals to students in need on non-school days in Elko County. Orla also donated \$10,000 to the program.

Members of the South Railroad team volunteered regularly to help with the FISH drive-up food pantry. Orla South Railroad is proud to do its part to ensure members of the local communities aren't hungry and is honored to partner with the local nonprofit organizations to help by donating time and resources. Orla team members also volunteered through FISH to deliver 175 Thanksgiving meals to schools and distribute holiday meals during the Christmas season.

We created a scholarship program for 2024 Elko County high school graduates who demonstrate resilience and the ability to overcome adversity. We received over 30 applications, and eight finalists were selected by the South Railroad leadership team. The recipients spanned over 120 miles from West Wendover to Spring Creek, covering four different communities and high schools. Members of Orla's leadership team participated in the award ceremonies and handed out

the scholarships.

Orla South Carlin Complex partnered with Women in Mining (WIM) Nevada to support women, promote diversity, and educate the public on today's mining industry. During the year, our Community Relations Manager served as Chair of the WIM Education Committee and led an educational volunteer event on mining to over 600 Elko High School Juniors and Seniors.

## 2025 Priorities

### Camino Rojo

**Support the poultry farm in expanding egg sales to local mining companies, including our own operations; developing a second flock to sustain production; and pursuing international certification for animal welfare and free-range practices.**

**Continue vocational training in partnership with the Institute for Vocational Training in the State of Zacatecas (ICATEZ).**

### South Railroad

**Form a Community Investment Committee to involve employees in reviewing donation and sponsorship requests, strengthening local engagement, and aligning contributions with Orla's community investment priorities.**

**Continue collaborating with Tribal Council leaders to advance a community sustainability project under their Comprehensive Economic Development Strategy (CEDS), establishing a long-term partnership rooted in shared value.**

**Partner with the State Parks department to complete a safety-focused infrastructure project for a nearby community, improving lighting, seating, and bus pick-up areas for local schoolchildren.**



### 4.3 Community Relations

## 2024 Social Incidents

Registered at Camino Rojo

**Note:** In 2024, most incidents were related to local suppliers, land access, job opportunities, and community infrastructure. All incidents registered in 2024 were resolved during the year.

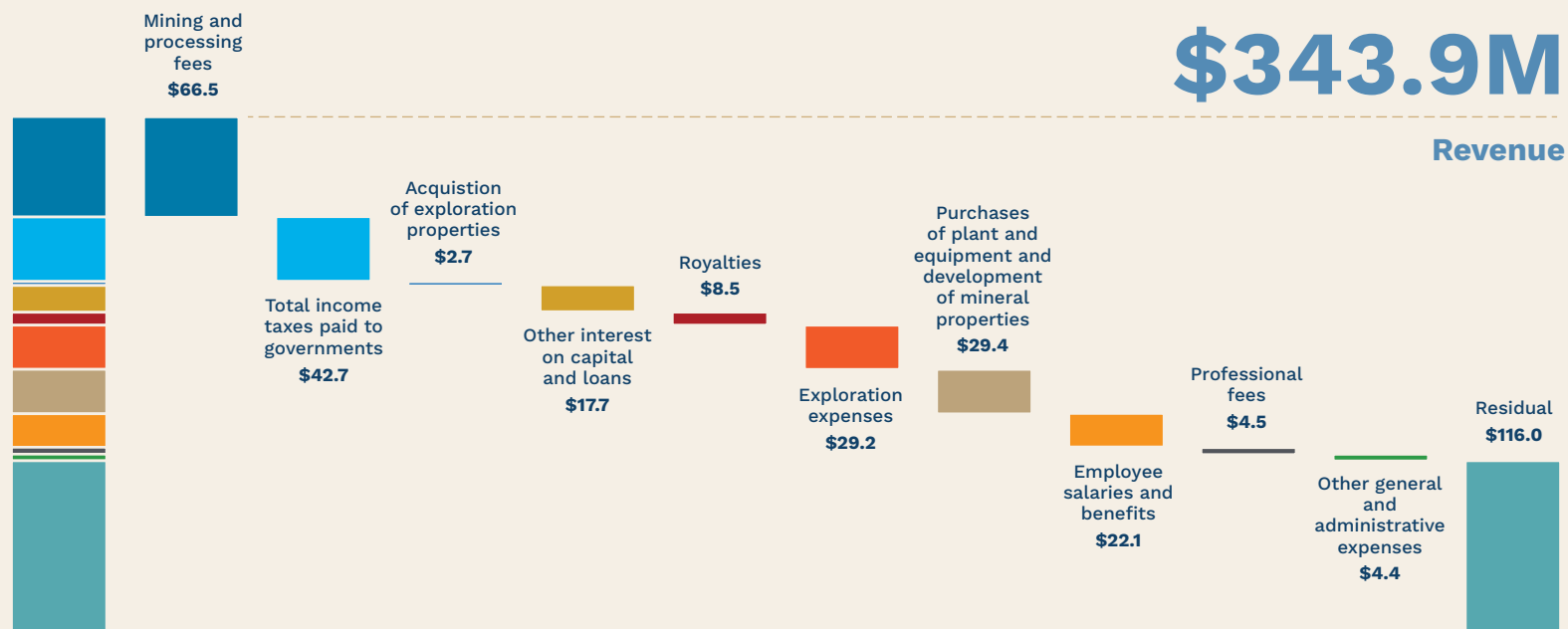
INCIDENTS AND GRIEVANCES	2024	2023	2022
Insignificant	0	1	4
Minor	4	5	11
Moderate	12	6	4
Major	0	0	0
Extreme	0	0	0
<b>Total</b>	<b>16</b>	<b>12</b>	<b>19</b>



## 2024 Breakdown of Economic Impact

Direct Economic Value Generated and Distributed (\$ Millions)

The information in this graph is reported and disclosed in Orla's Consolidated Financial Statements, December 31, 2024 available on our website.





## Case Study

# Laying the Foundation for Stronger Food Systems and Community Empowerment in San Tiburcio

## Orla Camino Rojo promotes community food self-sufficiency, technical education, and sustainable development with the EMSaD San Tiburcio Poultry Farm

A collaboration between Orla Camino Rojo, the San Tiburcio Ejido, the College of Scientific and Technological Studies of the State of Zacatecas (CECyTEZ), and the San Tiburcio Distance Higher Secondary Education Center (EMSaD) has launched an innovative initiative creating new opportunities for local communities. The EMSaD San Tiburcio Poultry Farm is reviving poultry-raising skills to support self-sufficiency and income generation through egg production and sales.

### Natural, Stress-Free Production

The 1,000 chicks that arrived at the San Tiburcio Poultry Farm at just one day old have been raised in a low-stress, free-range environment under the care of EMSaD. With access to open areas and optimal conditions, the hens have

thrived with the quality of life and boosted the nutritional value of the 5,000 eggs produced per week. The vibrantly coloured eggs (a product of the hens' specialized breeds) are sold within local communities and through partnerships with food service providers. Orla Camino Rojo also plans to supply the eggs in its cafeterias and offer direct sales to employees, providing them with fresh, quality products that positively impact the community.

### Local Skill Development

EMSaD San Tiburcio serves students from 22 rural communities and has gained national recognition for its focus on innovation and technology. In addition to current programming, they are introducing technical training in poultry farming, giving young people an



opportunity to develop skills in raising and utilizing laying hens. The project considers reinvesting in technical equipment, enhancing EMSaD's education offerings, and providing greater learning opportunities for the region's youth.

#### **Sustainability and Responsible Resource Use**

The EMSaD San Tiburcio Poultry Farm also stands out for its sustainable approach. Orla Camino Rojo and EMSaD have worked together to improve waste management, implementing concrete actions and innovative solutions that not only minimize environmental impact but also improve soil quality and support local crop production.

Since producing its first egg on October 18, 2024, the farm has experienced steady growth. While the project does not yet yield economic profits for the school during this initial phase, it has had significant impact on education, nutrition, and community resilience.

With this initiative, Orla Camino Rojo reaffirms its commitment to neighboring communities by driving projects that enhance education, promote self-reliance, and generate long-term well-being.





## 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 (UNGPR). 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.





#### 4.4 Human Rights

- 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.



#### 4.4 Human Rights

##### Engaging with Rightsholders

Critical to our human rights approach is meaningful, transparent dialogue, and considering potential human rights impacts in our decision-making processes. We use a variety of engagement methods to gather input and feedback on many issues including human rights. We also maintain a whistleblower hotline, the Orla Confidence Line, so anyone can report any suspected possible human rights concerns or abuses.

##### Security and Human Rights

As a mining company, we use security personnel and systems to protect our assets and people. It is important that we manage security in line with human rights, especially since we operate in areas of heightened human rights risk.

Orla is committed to implementing a human rights and security approach consistent with industry-adopted standards such as the Voluntary Principles on Security and Human Rights, the International Bill for Human Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.



## Performance

During the year, we continued to conduct supply chain mapping and risk assessments. This exercise is important to identify any potential human rights-related concerns or risks in our supply chain, including our risk exposure to modern slavery.

We adopted Orla's new [Responsible Procurement Standard](#) to reinforce our commitment to ethical sourcing practices with the aim of embedding core requirements such as respect for human rights due diligence into our daily procurement decisions.

An ESG-focused supplier survey was piloted with a select group of vendors, featuring questions related to forced and child labour. The pilot phase allowed for evaluation of the tool's

effectiveness prior to broader rollout.

We also delivered targeted training across the company to build awareness of responsible sourcing and human rights risks. This included a mandatory course for all employees introducing key concepts such as child labour, forced labour, and modern slavery, and a deeper dive for our procurement team at Camino Rojo focused on best practices in sustainable procurement. In parallel, we participated in the UN Global Compact's Business & Human Rights Accelerator program, which further informed our approach to human rights due diligence and helped align our practices with emerging global standards.

## 2025 Priorities

**Roll out targeted training at the Musselwhite Mine to build awareness of responsible sourcing and human rights risks, aligning expectations across all operations.**

**Integrate Musselwhite into our broader supply chain risk assessment efforts to support a unified approach to identifying and addressing potential human rights risks across the business.**

**Advance the company-wide implementation of the [Responsible Procurement Standard](#) to ensure consistent expectations for ethical sourcing and human rights due diligence across all sites.**

**Design and share the stand-alone Labor Rights Policy, reflecting our approach to respectful relationships with our employees.**





## 5.1 Corporate Governance and Business Ethics

## 5.2 Compensation and ESG

## 5.3 Risk Management

OUR PRIORITY  
SUSTAINABLE  
DEVELOPMENT  
GOALS



# Governance



## 5.1

# Corporate Governance & Business Ethics

### Corporate Governance

**The Board of Directors (the “Board”) and Senior Leadership Team at Orla are dedicated to robust corporate governance. Our corporate governance practices are designed to create long-term value and fulfill our responsibilities to shareholders and other stakeholders.**

The Board is responsible for the overall stewardship of the Company. As outlined in its Mandate, the Board’s main responsibilities include overseeing corporate performance and risk management, and ensuring that management has the quality, depth, and continuity needed to achieve Orla’s strategic objectives.

Our Board approves policies and procedures to ensure that Orla operates at all times within applicable laws, regulations, and in accordance Orla’s Code of Conduct and Ethics. The Board also oversees Orla’s sustainability activities,

including ensuring that appropriate environmental stewardship, health and safety management, social performance, and human resource systems are implemented and effective.

Five committees assist the Board with its governance functions in critical areas:

- Audit Committee;
- Corporate Governance and Nominating Committee;
- Environmental, Sustainability, Health and Safety (ESHS) Committee;
- Human Resources and Compensation Committee (HRCC); and
- Technical Committee.

In line with best practices, we review the experience, qualifications, and skills of the Company’s directors each year to ensure that the composition of the Board and committees and the competencies and skills of the members are in line with the evolving needs of the Company.

### Why it Matters

At Orla, we view good governance and ethical practices as essential for sustainable business success. These interconnected foundations support the effective management of our affairs, help us earn and maintain public trust, foster compliance with applicable laws and regulations, and create value for all stakeholders, including employees, partners, communities, and shareholders.





## 5.1 Corporate Governance & Business Ethics

The Board maintains a skills matrix to identify and evaluate the competencies and skills of the members based on the individual experience and background of each director. The skills matrix is also used to evaluate the Board's tenure and diversity, including gender.

Orla is committed to providing transparent disclosures related to our business activities, impacts and risks. In addition to adhering to Canadian securities laws, the TSX, and the NYSE American regulations, we are committed to the continuous improvement of our governance practices. We actively monitor corporate governance trends and developments in Canada, the U.S., and other jurisdictions in which we operate and update our governance practices as necessary.

Orla is a participant of the UN Global Compact, the world's largest corporate sustainability initiative. As a participant, we are committed to aligning our strategies, policies, and initiatives with the Compact's Ten Principles covering human rights, labour practices, environmental responsibility, and anti-corruption.

### Ethical Business Conduct

At Orla, we have upheld high ethical standards since our founding. Our [Code of Conduct and Ethics](#) (the Code) defines the standards and expectations for everyone at Orla and our subsidiaries, consultants, and contractors.

Rooted in core values of honesty, integrity, and accountability, the Code addresses various topics, including conflicts of interest, gifts and entertainment, anti-bribery and anti-corruption, insider trading, confidential information, harassment and discrimination, human rights, proper use of company assets, and environment, health, and safety.

During the onboarding process, we require all new staff and contractors to review the Code. All employees, management and directors must also review and certify compliance with the Code annually. The Board monitors compliance with the Code and management provides a yearly report to the Board regarding issues, if any, arising under the Code and the Company's corporate governance policies.

Additionally, since some directors also serve as directors and officers of other companies engaged in similar activities, the Board must comply with the conflict-of-interest provisions of the Canada Business Corporations Act (CBCA) and relevant securities regulatory instruments. This ensures that directors exercise independent judgment when considering transactions and agreements in which a director or officer has a material interest. Each director must declare the nature and extent of their interest and is not permitted to vote at meetings involving such conflicts.

## Corporate Policy Governance

### Board Mandate

#### Board Charters

- Audit Committee Charter
- Environmental, Sustainability, Health and Safety Committee Charter
- Governance and Nominating Committee Charter
- Human Resources and Compensation Committee Charter
- Technical Committee Charter

### Code of Conduct & Ethics

#### Sustainability Related Policies

- Anti-Bribery and Anti-Corruption Policy
- Climate Change Policy
- Corporate Disclosure Policy
- Corporate Social Responsibility Policy
- Diversity Policy
- Environmental, Sustainability, Health & Safety Policy
- Human Rights Policy
- Indigenous Peoples Policy
- Insider Trading Policy
- Whistleblower Policy
- Workplace Bullying, Harassment, and Violence Policy

#### Sustainability Related Standards

- Closure and Reclamation Management Standard
- Community Investment Standard
- Enterprise Risk Management Standard
- Hazardous Materials Management Standard
- Stakeholder Engagement and Community Response Standard
- Responsible Procurement Standard
- Water Management Standard
- Biodiversity Management Standard
- Air Emissions and Noise Management Standard

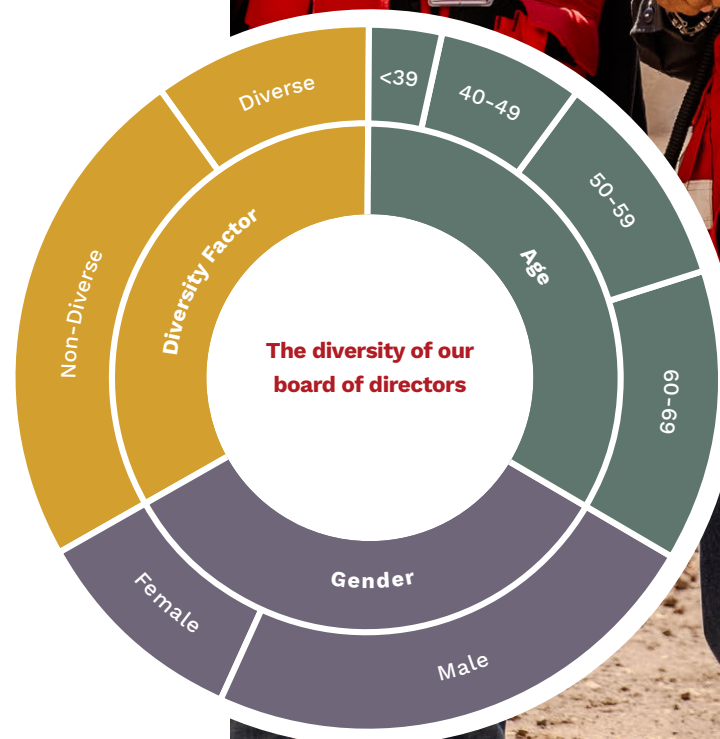
5.1 Corporate Governance & Business Ethics

## Board Expertise and Experience

Orla's Board has a diverse skill set. The following matrix outlines the primary expertise, skills, and background of Board members. Additional information on each member of the Board is provided on our website and our [2025 Annual Information Circular](#).

		CHARLES JEANNES	JASON SIMPSON	JEAN ROBITAILLE	TIM HALDANE	DAVID STEPHENS	ELIZABETH MCGREGOR	TAMARA BROWN	SCOTT LANGLEY	ANA SOFIA RIOS	ROB KRUMAROV	TOTAL / AVERAGE
Relevant industry skills	Mining Industry	•	•	•	•	•	•	•	•	•	•	10
	Operations	•	•	•	•			•			•	6
	Environment, Health, Safety, and Sustainability	•	•	•	•			•		•	•	7
	Geology and Exploration		•	•	•			•			•	5
General business skills	Financial Literacy	•				•	•	•	•	•		6
	Compensation/HR	•	•	•			•	•			•	6
	Governance	•	•	•	•	•	•	•		•	•	9
	Senior Executive	•	•	•	•	•	•	•	•		•	9
	Risk Management	•	•	•	•	•	•	•		•	•	9
	Legal	•								•		2
	International Markets	•	•	•	•	•	•	•	•	•	•	10
	Capital Markets	•		•		•	•	•	•	•	•	8
	Mergers & Acquisitions	•		•	•	•	•	•	•	•	•	9

The information in this table is as of December 31, 2024.





## 5.1 Corporate Governance &amp; Business Ethics

## Sustainability Governance Structure



- A** The Board of Directors is responsible for overseeing management's approach to ESG-related risks and ensuring the implementation of appropriate sustainability systems to effectively monitor and manage those risks with a view to the long-term viability of the Company and its impacts across all stakeholders. The Board approves and monitors compliance with all sustainability policies and standards and applicable laws.
- B** The Corporate Governance and Nominating Committee provides focus on governance that enhances the Company's performance. The Committee monitors compliance with the Code of Conduct and Ethics, assesses and makes recommendations regarding the Board's effectiveness, and establishes and leads the process for identifying, recruiting, appointing, re-appointing, evaluating, and providing ongoing development for directors.

- C** The Audit Committee is responsible for the Company's financial reporting process and the quality of its financial reporting. The Committee provides independent review and oversight of the financial reporting process, the system of internal control and management of financial risks, and the audit process, including the selection, oversight, and compensation of the Company's external auditors.
- D** The objective of the ESHS Committee is to monitor and review the health, safety, environmental and social policies, standards, practices, and processes of the Company. The Committee has the authority to engage independent counsel or other experts and conduct any investigation that it considers appropriate. It is responsible for reviewing and approving annual disclosures relating to the Company's sustainability.

- E** The HRCC Committee reviews and approves the philosophy and design of the Company's compensation programs and the compensation of the Company's executives and members of the Board. The HRCC also provides oversight for compensation policies for all employees. In addition the HRCC is responsible for reviewing and making recommendations to the Board in connection with the Company's succession planning with respect to the CEO and other senior executive officers.
- F** The Technical Committee was established to assist the Board in its oversight of the reporting of the quantity and quality of the Company's mineral resources and reserves, the operating activities of the Company's material mines, the Company's technical activities relating to its material exploration, operational efficiency opportunities, life of

- mine plans, and development projects and the Company process for identifying and managing technical risks.
- G** Ultimate responsibility for sustainability and ESG performance within Orla rests with our Chief Executive Officer.
- H** Executive management covers Strategy, Operations, Finance, and Sustainability.
- I** Site General Managers make decisions at the operational level and own the management of ESG risks at each site

## 5.1 Corporate Governance & Business Ethics

### Anti-Bribery and Anti-Corruption

Bribery is the act of offering or accepting something valuable to sway someone's actions or decisions, typically breaking legal or ethical rules. Corruption is the abuse of power or authority for personal benefit, often through unlawful or unethical methods. Most of Orla's operations are not in countries that rank high on Transparency International's Corruption Perception Index, which is based on perceived level of public sector corruption. However, corruption and bribery are a growing problem across the world. As a responsible business and signatory to the UN Global Compact Network, we are committed to meeting our fundamental responsibilities related to anti-bribery and anti-corruption and have measures in place to deter and detect such activities and ensure compliance with applicable laws.

Building on our Code of Conduct and Ethics, Orla's [Anti-Bribery Policy](#) enforces a zero-tolerance approach to bribery and corruption, mandates regular employee training, outlines reporting mechanisms for potential violations, and requires accurate recording keeping.

This policy is applicable to all employees, officers, Board directors, and agents such as contractors, subcontractors and consultants, and aligns with international standards such as the Organisation for Economic Co-operation and Development

(OECD) Guidelines. The policy also outlines disciplinary measures for violations and encourages reporting through various channels, including a whistleblower hotline. We have training programs to promote ethical behaviour and provide additional guidance to personnel who may be exposed to bribery and corruption risks. We regularly review the Anti-Bribery and Anti-Corruption Policy and its effectiveness, which is overseen by the Corporate Governance and Nominating Committee of the Board.

### Whistleblower Policy and Hotline

A key aspect of our culture is promoting an environment of openness where employees and other stakeholders can voice concerns or complaints, particularly if they witness or perceive behaviour that violates the Company's code, policies, or standards.

Within the workplace, we actively encourage our people to consult supervisors, managers, or other appropriate personnel when uncertain about the best course of action in a given situation. Representatives may also contact a member of senior management or the Chair of the Audit Committee, if appropriate.

Our [Whistleblower Policy](#) outlines the steps for reporting a complaint regarding accounting, internal accounting controls, auditing matters, or fraud. The policy protects any individual who in good faith submits any complaint and states





## 5.1 Corporate Governance & Business Ethics

that reported matters will be kept confidential and may be communicated anonymously if desired.

While we encourage employees and other stakeholders to first report concerns through their team leader, individuals can also use the Orla Confidence Line. This confidential service is available 24/7, in English and Spanish, and is managed by an independent reporting and risk mitigation agency. The service is a safe option for reporting concerns when other avenues may not be suitable. Once a complaint is received, it is promptly

investigated by the Chair of the Audit Committee to ensure thorough and impartial handling of the matter.

### Transparent Payments

Orla is committed to tax and payment transparency and to complying with all applicable tax laws, rules, and regulations. The Board oversees Orla's financial reporting, including tax matters.

We provide annual reports on our tax payments to governments in the jurisdictions where we operate, as

required by the Canadian Extractive Sector Transparency Measures Act (ESTMA). This information includes details about taxes, royalties, fees, and other types of payments in each country where we operate.

With limited exceptions, employees and Company representatives are prohibited from offering, promising, or authorizing payments or other benefits to government officials, political parties, election campaigns, or political candidates. For more information, please see the [ESTMA](#) disclosure archive on our website.



## Performance

As of December 31, 2024, Orla's Board was comprised of 10 directors, 8 of whom were independent of the Company.

To enhance environmental governance and accountability across Orla, we created five new environmental standards, which are discussed in the Environment section of this report.

We continued to report on Orla's efforts to comply with Canada's new Fighting Against Forced Labour and Child Labour in Supply Chains Act. Our [2024 Modern Slavery Report](#) outlines our actions to prevent and reduce the risk of modern slavery in our supply chain.

We adopted a [Responsible Procurement Standard](#), marking a significant milestone in Orla's commitment to ethical sourcing

practices. Our goal is to ensure that our operations and the precious metals we sell, as well as the products and services we purchase, are manufactured in a manner that is respectful to human rights and the rights of workers. We developed and launched a mandatory training course for all employees in December 2024, introducing the [Responsible Procurement Standard](#) and key concepts such as child labour, forced labour, and modern slavery.

We also delivered a comprehensive training course specifically for the procurement team of our Camino Rojo operation to go beyond the requirements of the [Responsible Procurement Standard](#), covering best practices for responsible and sustainable procurement, due diligence, responsible local procurement, and its connection to human rights.

## 5.2

# Compensation & Sustainability

**To attract, retain, and motivate highly-qualified people, we are committed to providing employees with a competitive compensation package that includes incentives and benefits.**

Our short- and long-term compensation programs are designed to be fair, competitive, and aligned with both individual and company-wide objectives, including our sustainability goals. These objectives are communicated to each employee early in the year by Orla's Chief Executive Officer. Our employees are involved in executing initiatives that align with these goals and contribute value to the organization.

### Linking Sustainability Performance to Compensation

Our efforts to enhance our positive legacy and minimize adverse impacts are linked to performance reviews and remuneration at all levels of the organization. Sustainability

### Why it Matters

Orla's business activities impact people, communities and the environment. It is therefore crucial we hold ourselves accountable to ensure we run our business responsibly and sustainably. An important way we do that is by tying our sustainability performance to our compensation program.





## 5.2 Compensation & Sustainability

factors are integrated into our compensation model, including both executive and eligible non-executive employees short-term incentives. This approach emphasizes the importance of sustainability to our business strategy and future success and ensures that everyone at Orla shares responsibility and actively contributes to achieving our sustainability targets.

### Equitable Pay

Orla's approach to executive compensation is also predicated on "pay-for-performance" and fully disclosed publicly. We are committed to providing equitable compensation, supporting internal equity and fairness for all team members.

### Targets and Metrics

Sustainability performance – encompassing social, safety, and environmental metrics – account for 25 percent of our annual corporate objectives. This weighting mirrors that of the Company's production, finance, and strategic objectives, further reinforcing the importance of sustainability to the viability of our business.

### Oversight

The Human Resources and Compensation Committee (HRCC) of the Board is responsible for reviewing and approving the philosophy and design of the Company's compensation programs. Among its activities, the Committee works to ensure that compensation is linked to Orla's sustainability performance.

The HRCC undertakes an annual review of our compensation programs, and short- and long-term incentive plan designs, to ensure that they align with our peer group and industry best practices and trends. These reviews help us refine and evolve our practices as appropriate.

We also provide shareholders with a non-binding "say-on-pay" vote on Orla's executive compensation, allowing them to submit formal feedback that can influence Orla's compensation practices.

## Performance

The Human Resources and Compensation Committee undertook a comprehensive review of our executive compensation programs and related governance practices for the 2024 compensation year. As part of this review, the HRCC benchmarked compensation levels for our Named Executive Officers relative to our peer group. This benchmarking looked at the elements of target total direct compensation, including salary, target short-term incentives and long-term incentives, with our philosophy being to target the 50th percentile of our industry for expected levels of performance.

In 2023 and 2024 we introduced a non-binding "Say-on-Pay" vote. The first- and second-year results were overwhelmingly positive, with 97.5% and 98.8% of Shareholders accepting the Company's approach to executive compensation, respectively. In 2025, Shareholders will again be asked to consider the "Say-on-Pay" vote. The goal is to design an executive compensation program that maximizes stakeholder value.

We continue to use key production, ESG and other metrics to determine executive compensation. For 2024, the HRCC determined that overall performance against the corporate objectives set for the year either exceeded or far exceeded expectations (see chart below). During the year, the Company maintained a strong health and safety record, maintained support of the local communities in which it operates, achieved the high end of its revised production guidance at industry leading cost, continued exploration and study work at each project, and repaid all amounts under its credit facility.

To recognize and reward executives and certain employees for the Company's acquisition of Musselwhite, the HRCC and the Board approved a one-time increase of the corporate performance score by 30%. This award was intended to recognize extraordinary contributions in 2024, encourage focus on successful integration of Musselwhite into the Company's portfolio and reinforce continuity and stability of the leadership team during a critical period.

## 5.2 Compensation &amp; Sustainability

## Compensation Metrics in 2024

COMPONENT	PERFORMANCE INDICATORS	CRITERIA / DISCUSSION	2024 RESULTS
25% ESG	Lost time injury rates	Lost Time Injury Frequency of 2.59 during a full operational year	Exceeded expectations
	Sustainability	Completed multi-stakeholder partnership projects	
	Environmental incidents	No category 4 or 5 incidents as defined by the US Environmental Protection Agency during a full construction year	
	Sustained operations	No disruptions to operations and maintenance of community relations	
25% Production	Gold poured versus guidance	136,748 oz of gold poured versus original guidance of 110,000 to 120,000 oz	Far exceeded expectations
25% Expenditure	Operating and capital cost versus budget	Operating costs at low end of updated guidance and capital costs slightly below guidance	Exceeded expectations
25% Strategic Objectives	Exploration	Drilling programs completed	Exceeded expectations
	Project development	Protracted permitting timelines in Mexico and Nevada	
	Corporate development	Acquisition of Musselwhite	
	Improve balance sheet	Disciplined debt repayment	
Corporate Performance Score			150%
Musselwhite Adjustment			+30%
Adjusted Performance Score			180%



## 5.3

# Sustainability & Risk Management

### Orla's Risk System

**Orla's Enterprise Risk Management (ERM) system serves as a comprehensive and consistent approach to risk management, enabling us to pursue our business objectives more effectively while demonstrating strong corporate governance practices. The ERM system allows us to identify, evaluate, and prioritize the most significant risks that may have an impact, both positively and negatively, on achieving our strategic goals.**

ERM is integral to our organizational processes, including strategic planning and decision-making, and incorporates our [ERM Standard](#), which is designed to uphold sustainable practices in all our activities so that Orla, as well as our contractors, maintain equally high standards. The requirements in the ERM 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 initiative.

The accompanying diagram highlights the key principles that guide our ERM system.

### Risk Registry

For each of our operations, we have established an enterprise risk registry using our Company- wide matrix, which our local teams regularly review and update during monthly and quarterly managerial meetings. These sessions involve discussions on specific sustainability-related risks, such as those stemming from climate change, supply chain disruptions, or labour shortages, which could impact the short- and long-term success of our sites.

The likelihood and impact of each risk are rated, taking into account various factors, including geopolitical events and social and business trends in each jurisdiction

### Why it Matters

Risk management forms a fundamental aspect of robust governance and responsible business practices. As a mining company, it is critical that we consistently assess, prioritize, and mitigate the wide-ranging risks that may impact our business and stakeholders. These risks range from labour shortages and supply chain disruptions to social unrest, environmental and health and safety incidents, extreme weather events, and security threats (such as theft, fraud, and cybercrime).



### 5.3 Sustainability & Risk Management

where Orla operates. The top risks are consolidated at the corporate level and shared with the Senior Leadership Team on a quarterly basis and with the Board on a semi-annual basis.

#### Addressing Key Risks

##### *Climate change risks*

A changing climate is one of the most complex and challenging risks facing our world today. We continue working to understand potential climate risks and how they may impact our business and stakeholders.

##### *Cybersecurity risk*

Our information technology (IT) systems, and those of Orla's third-party service providers and vendors, face increasing cyber security risks in the fast-evolving digital ecosystem. Cyber attacks could result in significant costs, lost sales, fines, and lawsuits, and damage to the Company's reputation.

To guard against and stay ahead of these evolving threats, we continue to strengthen our cyber resilience by developing and enhancing the controls, processes, and practices designed to protect our systems – including computers, software, data, and networks – from attack, damage, or unauthorized access.

Looking ahead, we plan to further formalize our approach by introducing a dedicated cybersecurity standard to guide and reinforce our practices company-wide.

##### *Supply chain risk*

Identifying and addressing potential vulnerabilities in our supply chain is an ongoing priority. We rely on local, national, and international suppliers, so it is essential that we carefully monitor third-party risks. Wherever possible, we strive to work with suppliers based in the countries and communities in which we operate. We are also intentional about upholding the financial integrity and ethical sourcing practices of our supply chain with the goal of ensuring there is consistent respect for human rights among all suppliers.

For example, our Finance and Accounting team oversees scrutiny and approval of new vendor registrations across corporate and operational levels. At Camino Rojo, all supplier contracts include provisions on anti-corruption, as well as policies and procedures to mandate that all applicable laws, ethical standards, human rights, and anti-corruption regulations are followed. Suppliers are barred from engaging with clients involved in illegal armed conflicts or human rights abuses, and all Camino Rojo contractors are required to register and demonstrate compliance with tax and

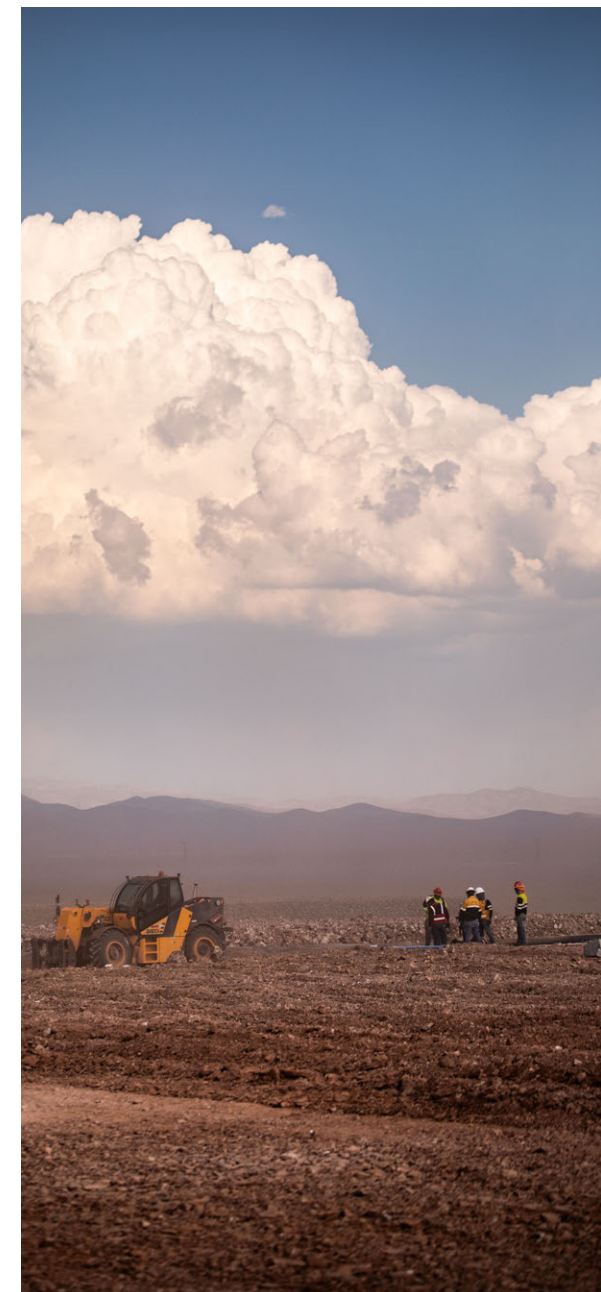
social security obligations every three years.

To further help guide our efforts, we use the Global Slavery Index to evaluate the risk of modern slavery (forced and child labour) in our organization and supply chain. The Global Slavery Index rates risk of modern slavery to be medium in Mexico and low in the U.S. and Canada. We do not use suppliers from any of the top 25 countries with the highest prevalence of modern slavery.

Looking ahead, we remain focused on establishing and honouring policies and practices, and providing transparent reporting, to prevent forced and child labour across our operations and supply chain.

##### *Geopolitical risk*

Companies with global operations must navigate today's challenging geopolitical landscape. With two of our principal mineral properties located in Mexico and the United States, Orla faces a diverse array of risks – ranging from permitting challenges, currency fluctuations, and adverse legal developments to political and economic instability that impact our mining activities. We proactively monitor and manage these geopolitical risks through our ERM process.





### 5.3 Sustainability & Risk Management

#### Risk Governance and Accountability

The Board of Directors, as per its mandate, is responsible for reviewing the principal risks of the Company's business and ensuring appropriate measures are in place, such as environmental stewardship and health and safety management systems, to effectively monitor and manage those risks.

In addition, the Environmental, Sustainability, Health and Safety Committee has specific responsibilities for assessing environmental, health and safety, and sustainable development risks, including those related to human rights and community and government relations.

Everyone at Orla plays a role in recognizing and managing risks, particularly safety hazards. To embed a culture of risk management, we provide training and communication to raise awareness of essential risk management concepts and tools across our organization.

### The Key Principles that Guide our ERM System



6.1 **Performance Table:**  
**SASB and TCFD Standard**

6.2 **Cautionary Notes**



# Appendices



## 6.1 Performance Table

SASB INDEX
TCFD Standard
LPRM

# Camino Rojo: SASB Index, TCFD Standard, LPRM

SASB REF	SUGGESTED DISCLOSURES	2024 OPERATIONS	2023 OPERATIONS	2022 OPERATIONS
EM-MM-110a.1 <sup>1</sup>	Gross global Scope 1 emissions (Operational control) [tonnes CO <sub>2</sub> e]	22,269	14,290.32	13,238.53
EM-MM-110a.1 <sup>2</sup>	Gross global Scope 2 emissions (Operational control) [tonnes CO <sub>2</sub> e]	9,952	9,060.03	7,843.69
EM-MM-110a.1	Percentage of emissions (Operational control) covered under emissions-limiting regulations	100%	100%	100%
EM-MM-110a.2	Discussion of long-term and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets	Section 3.3; pages 28-32	Section 3.3; pages 28-32	Section 3.3; pages 28-32

### Air Quality

EM-MM-120a.1	Carbon Monoxide (CO) [tonnes]	0	0	0
EM-MM-120a.1	Nitrogen Oxides (NO <sub>x</sub> ) (excluding N <sub>2</sub> O) [tonnes]*	7.43	4.91	4.82
EM-MM-120a.1	Sulphur Oxides (SO <sub>x</sub> ) [tonnes]	0	0	0
EM-MM-120a.1	Particulate matter (PM <sub>10</sub> ) [tonnes]	0	0	0
EM-MM-120a.1	Mercury (Hg) [tonnes]	0	0	0
EM-MM-120a.1	Lead (Pb) [tonnes]	0	0	0
EM-MM-120a.1	Volatile organic compounds (VOCs) [tonnes]	0	0	0

### Energy Management

EM-MM-130a.1	Total energy consumed [GJ]	80,684 GJ (grid electricity, only) + 269,357 GJ (direct fuel usage) + 7,264 (explosives) + 360 GJ (renewable). Total*: 357,665 GJ	74,460 GJ (grid electricity, only) + 180,115 GJ (direct fuel usage) + 6,121 GJ (explosives) + 355 GJ (renewable). Total*: 261,074	66,754.8 (grid electricity, only) + 181,285 (direct fuel usage). Total*: 248,040
EM-MM-130a.1	Percentage grid electricity	23.00%	28.5%	26.9%
EM-MM-130a.1	Percentage renewable	0.10%	0.14%	NR

### Water Management

EM-MM-140a.1	Total water withdrawn (fresh and non-fresh) [thousand m <sup>3</sup> ]	800,645	800,226	976,309
EM-MM-140a.1	Total water consumed	800,645	800,226	976,309
EM-MM-140a.1	Percentage of fresh water withdrawn and consumed in regions with High or Extremely High Baseline Water Stress	100%	100%	100%
EM-MM-140a.2	Number of incidents of non-compliance associated with water quantity and/or quality permits, standards, and regulations	0	0	0

\*2023 and 2022 values were recalculated using the Emission Factor for Heavy equipment according to Mexican Government Guidelines"

## 6.1 Performance Table

### TCFD Task Force on Climate-related Financial Disclosures (TCFD)

TCFD REF	SUGGESTED DISCLOSURES	2024 OPERATIONS	2023 OPERATIONS	2022 OPERATIONS
TCFD Governance a	Disclose the role of the board of the organization in overseeing climate-related issues.	<b>Sections</b> 1.2, 3.3, 5.1, & 5.3; <b>Pages</b> 3, 28-32, 61-66, 70-72	<b>Sections</b> 1.2, 3.3, 5.1, & 5.3; <b>Pages</b> 3, 28-32, 61-66, 70-72	<b>Sections</b> 1.2, 3.3, 5.1, & 5.3; <b>Pages</b> 3, 28-32, 61-66, 70-72
TCFD Governance b	Disclose the role of management in assessing and managing climate-related issues	<b>Sections</b> 1.2, 3.3, 5.1, & 5.3; <b>Pages</b> 3, 28-32, 61-66, 70-72	<b>Sections</b> 1.2, 3.3, 5.1, & 5.3; <b>Pages</b> 3, 28-32, 61-66, 70-72	<b>Sections</b> 1.2, 3.3, 5.1, & 5.3; <b>Pages</b> 3, 28-32, 61-66, 70-72
TCFD Strategy a	Disclose the climate-related risks and opportunities the organization has identified over the short, medium, and long term.	<b>Sections</b> 3.3 & 5.3; <b>Pages</b> 28-32 & 70-72;	<b>Sections</b> 3.3 & 5.3; <b>Pages</b> 28-32 & 70-72;	<b>Sections</b> 3.3 & 5.3; <b>Pages</b> 28-32 & 70-72;
TCFD Strategy b	Disclose the impact of climate-related risks and opportunities on the organization's businesses, strategy and financial planning.	<b>Sections</b> 2.2, 2.3, 3.3, 5.1 & 5.2; <b>Pages</b> 10-14, 28-32, 61-69	<b>Sections</b> 2.2, 2.3, 3.3, 5.1 & 5.2; <b>Pages</b> 10-14, 28-32, 61-69	<b>Sections</b> 2.2, 2.3, 3.3, 5.1 & 5.2; <b>Pages</b> 10-14, 28-32, 61-69
TCFD Strategy c	Disclose the resilience of the organization's strategy, taking into consideration different climate-related scenarios including a 2°C or lower scenario.	<b>Section</b> 3.3; <b>Pages</b> 28-32	<b>Section</b> 3.3; <b>Pages</b> 28-32	<b>Section</b> 3.3; <b>Pages</b> 28-32
TCFD Risk Management a	Describe the organization's processes for identifying climate-related risks.	<b>Sections</b> 2.3, 3.3, 5.1 & 5.2; <b>Pages</b> 13-14, 28-32, 61-69	<b>Sections</b> 2.3, 3.3, 5.1 & 5.2; <b>Pages</b> 13-14, 28-32, 61-69	<b>Sections</b> 2.3, 3.3, 5.1 & 5.2; <b>Pages</b> 13-14, 28-32, 61-69
TCFD Risk Management b	Describe the organization's processes for managing climate-related risks.	<b>Section</b> 3.3; <b>Pages</b> 28-32	<b>Section</b> 3.3; <b>Pages</b> 28-32	<b>Section</b> 3.3; <b>Pages</b> 28-32
TCFD Risk Management c	Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.	<b>Sections</b> 2.3, 3.3, 5.1, 5.3; <b>Pages</b> 13-14, 28-32, 61-66, 70-72	<b>Sections</b> 2.3, 3.3, 5.1, 5.3; <b>Pages</b> 13-14, 28-32, 61-66, 70-72	<b>Sections</b> 2.3, 3.3, 5.1, 5.3; <b>Pages</b> 13-14, 28-32, 61-66, 70-72
TCFD Metrics & Targets a	Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.	<b>Sections</b> 2.3, 3.3, 5.1, 5.2 & 5.3; <b>Pages</b> 13-14, 28-32, 61-66, 67-69, 70-72	<b>Sections</b> 2.3, 3.3, 5.1, 5.2 & 5.3; <b>Pages</b> 13-14, 28-32, 61-66, 67-69, 70-72	<b>Sections</b> 2.3, 3.3, 5.1, 5.2 & 5.3; <b>Pages</b> 13-14, 28-32, 61-66, 67-69, 70-72
TCFD Metrics & Targets b	Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	<b>34,355</b>	23,350	21,082
TCFD Metrics & Targets c	Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.	Orla completed in 2022 its first year of production. As such, the organization is determining baselines to further discuss climate-related targets		



## 6.1 Performance Table

### Waste & Hazardous Materials Management

SASB REF	SUGGESTED DISCLOSURES	2024 OPERATIONS	2023 OPERATIONS	2022 OPERATIONS
EM-MM-150a.1	Total weight of tailings waste [tonnes]	0	0	0
EM-MM-150a.1	Percentage of tailings waste recycled	0	0	0
EM-MM-150a.2	Total weight of mineral processing waste [tonnes]	8,563,536	739,4132	5,535,125
EM-MM-150a.2	Percentage of mineral processing waste recycled	0	0	0
EM-MM-150a.3	Number of tailings impoundments	0	0	0
EM-MM-150a.3	Number of tailings impoundments, broken down by MSHA hazard potential	0	0	0

#### Biodiversity Impacts

EM-MM-160a.1	Description of environmental management policies and practices for active sites	Section 3.0; Pages 19-38	Section 3.0; Pages 19-38	Section 3.0; Pages 19-38
EM-MM-160a.2	Percentage of mine sites where acid rock drainage is predicted to occur	0%	0%	0%
EM-MM-160a.2	Percentage of mine sites where acid rock drainage is actively mitigated	0%	0%	0%
EM-MM-160a.2	Percentage of mine sites where acid rock drainage is under treatment or remediation	0%	0%	0%
EM-MM-160a.3	Percentage of proven reserves in or near sites with protected conservation status or endangered species habitat	0%	0%	0%
EM-MM-160a.3	Percentage of probable reserves in or near sites with protected conservation status or endangered species habitat	0%	0%	0%

#### Security, Human Rights & Rights of Indigenous Peoples

EM-MM-210a.1	Percentage of proven reserves in or near areas of conflict	0%	0%	0%
EM-MM-210a.1	Percentage of probable reserves in or near areas of conflict	0%	0%	0%
EM-MM-210a.2	Percentage of proven reserves in or near Indigenous land	0%	0%	0%
EM-MM-210a.2	Percentage of probable reserves in or near Indigenous land	0%	0%	0%
EM-MM-210a.3	Discussion of engagement processes and due diligence practices with respect to human rights, Indigenous rights, and operation in areas of conflict	Sections 4.3 & 4.4; Pages 49-59	Sections 4.3 & 4.4; Pages 49-59	Sections 4.3 & 4.4; Pages 49-59

#### Community Relations

EM-MM-210b.1	Discussion of process to manage risks and opportunities associated with community rights and interests	Sections 2.2, 2.3 2.5, 4.2, 4.3, 4.4; Pages 10-15, 16-18, 43-59	Sections 2.2, 2.3 2.5, 4.2, 4.3, 4.4; Pages 10-15, 16-18, 43-59	Sections 2.2, 2.3 2.5, 4.2, 4.3, 4.4; Pages 10-15, 16-18, 43-59
EM-MM-210b.2	Number of non-technical delays	0	0	0
EM-MM-210b.2	Duration of non-technical delays	0	0	0

## 6.1 Performance Table

Mining Local Procurement Reporting Mechanism (LPRM)<sup>3</sup>

LPRM REF	TCFD SUGGESTED DISCLOSURES	2024 OPERATIONS	2023 OPERATIONS	2022 OPERATIONS
LPRM-302	LPRM 300: Local procurement spending by category: Community Level: Direct Area of Influence: ei: Ejidos San Tiburcio, El Berrendo, San Francisco de los Quijano, La Partdita	1,712,074	1,294,241	766,154 (42 community suppliers registered)
LPRM-302	LPRM 300: Local procurement spending by category: Local Level: Municipality of Mazapil	497,608	985,473	632,776
LPRM-302	LPRM 300: Local procurement spending by category: Regional Level: State of Zacatecas	9,623,634	5,922,084	7,722,740
LPRM-302	LPRM 300: Local procurement spending by category: National Level	72,525,631	67,287,778	48,089,214

## LPRM 300: Local procurement spending, Local Ejidos by Spending Category

LPRM-302.b	Community Relations	1,623,850	1,579,078	1,447,543
	Community Suppliers	1,712,074	1,294,241	766,154
	Human Resources	4,794,288	5,271,160	1,551,679
	Permits and Concession	2,616,600	2,525,846	2,601,753

SASB REF	SUGGESTED DISCLOSURES	2023 OPERATIONS	2023 OPERATIONS	2022 OPERATIONS
EM-MM-310a.1	Percentage of active workforce covered under collective bargaining agreements across all operations	55% at Camino Rojo	54% at Camino Rojo	56% at Camino Rojo
EM-MM-310a.1 EDI	Diversity and inclusion (%) Percentage of employees per employee category in each of the following diversity categories: i. Gender; ii. Age group: under 30 years old, 30-50 years old, over 50 years old; iii. Other indicators of diversity where relevant (such as minority or vulnerable groups). iv. Direct and Indirect (contractors)	30.9% of female direct employees at Camino Rojo  15% of female indirect employees at Camino Rojo	29.5% of female direct employees at Camino Rojo	29.3% of female direct employees at Camino Rojo  3.6% of female indirect employees at Camino Rojo
EM-MM-310a.1 EDI	Presence of gender equality policies in the company/organization to improve the gender balance ratio and increase women participation in managerial position?	Sections 2.2, 4.2, 5.1; Pages 10-12, 43-48, 61-66	Sections 2.2, 4.2, 5.1; Pages 10-12, 43-48, 61-66	Sections 2.2, 4.2, 5.1; Pages 10-12, 43-48, 61-66
EM-MM-310a.1 EDI	Pay gap (% , #) 1. Mean pay gap of basic salary and remuneration of full-time relevant employees based on gender (women to men) and indicators of diversity (e.g. Indigenous to non-indigenous) at a company level or by significant location of operation. 2. Ratio of the annual total compensation for the organization's highest-paid individual in each country of significant operations to the median annual total compensation for all employees (excluding the highest-paid individual) in the same country 3. Ratio of the basic salary and remuneration of women to men for each employee category, by significant locations of operation.	0.63 average basic salary (Female : Male) and 0.56 average remuneration at management level Camino Rojo  0.82 average basic salary (Female : Male) and 0.82 average remuneration at professional level Camino Rojo  0.80 average basic salary (Female : Male) and 0.80 average remuneration at administration level Camino Rojo  1.15 average basic salary (Female : Male) and 1.15 average remuneration at operational level Camino Rojo	0.69 average basic salary (Female : Male) at Camino Rojo  0.65 average remuneration (Female: Male) at Camino Rojo	

## 6.1 Performance Table

SASB REF	SUGGESTED DISCLOSURES	2024 OPERATIONS	2023 OPERATIONS	2022 OPERATIONS
EM-MM-310a.1 EDI	Discrimination and harassment incidents (#) and the total amount of monetary losses (\$) <ol style="list-style-type: none"> <li>Number of discrimination and harassment incidents, status of the incidents and actions taken.</li> <li>Total amount of monetary losses as a result of legal proceedings associated with:               <ol style="list-style-type: none"> <li>law violations, and</li> <li>employment discrimination</li> </ol> </li> </ol>	0	0	0
EM-MM-310a.1 Local Employment	Local Employment (%) Percentage of employees per employees and category (workers and managerial position) from local communities and gender. Direct and Indirect	56% of local direct employees across all sites  10.7% of local indirect employees (Camino Rojo)	48.7% of local direct employees across all sites  9.8% of local indirect employees (Camino Rojo)	59.4% of local direct employees across all sites  26.3% of local indirect employees (Camino Rojo)
EM-MM-310a.2	Number of strikes and lockouts	0	0	0
EM-MM-310a.2	Duration of strikes and lockouts [days]	0	0	0
<b>Workforce Health &amp; Safety</b>				
EM-MM-320a.1	Total Recordable Injury Rate as defined by OSHA for employees (Camino Rojo)	0.23	0.67	0.36
EM-MM-320a.1	Total Recordable Injury Rate as defined by OSHA for contractors (Camino Rojo)	0.79	4.05	0.36
EM-MM-320a.1	Fatality rate for employees (Camino Rojo)	0	0	0
EM-MM-320a.1	Fatality rate for contractors (Camino Rojo)	0	0	0
EM-MM-320a.1	Near miss frequency rate (NMFR) for employees (Camino Rojo)	2.37	3.34	0.36
EM-MM-320a.1	Near miss frequency rate (NMFR) for contractors (Camino Rojo)	1.69	6.07	0.36
EM-MM-320a.1	Average hours of health, safety, and emergency response training for employees (Camino Rojo)	106	49	19
EM-MM-320a.1	Average hours of health, safety, and emergency response training for contractors (Camino Rojo)	36	35	5
<b>Business Ethics &amp; Transparency</b>				
EM-MM-510a.1	Description of the management system for prevention of corruption and bribery throughout the value chain	<b>Sections 2.3, 5.1, 5.3;</b> <b>Pages 13-14, 61-66, 70-72</b>	<b>Sections 2.3, 5.1, 5.3;</b> <b>Pages 13-14, 61-66, 70-72</b>	<b>Sections 2.3, 5.1, 5.3;</b> <b>Pages 13-14, 61-66, 70-72</b>
EM-MM-510a.2	Production in countries that have the 20 lowest rankings in Transparency International's Corruption Perception Index [tonnes]	0	0	0

1. Orla's Scope 1 greenhouse gas (GHG) emissions are registered as tonnes of carbon dioxide equivalents (CO<sub>2</sub>e). CO<sub>2</sub>e is used to compare the emissions from various GHG sources based on their global warming potential (GWP). Orla followed the guidance approved by the Secretaría de Medio Ambiente y Recursos Naturales (Semarnat) and its Registro Nacional de Emisiones (RENE) that is consistent with the International Panel on Climate Change. Orla's main sources of direct GHG emissions include those generated by the consumption of fuel from non-renewable sources and industrial processes.

Emission factors are country- and fuel-specific and determined by the environmental authority Semarnat and are used to convert the fossil fuels consumed to GHG emissions in CO<sub>2</sub>e. For our only operation in Mexico, we have used emission factors published by Semarnat through the RENE national registry. According to SASB accounting metrics, Scope 1 emissions include direct emissions of GHGs from stationary or mobile sources that include, but are not limited to, equipment at mine sites, refineries and smelting facilities, office buildings, and metal transportation (marine, road, and rail).

2. GHG emissions that result from the generation of purchased or acquired electricity, heating, cooling, and steam consumed by an organization. Reference, GRI Standards Glossary 2016. For our only operation in Mexico, we have used emission factors published by Semarnat through the RENE national registry.

3. Mining Local Procurement Reporting Mechanism (LPRM), The Mining Local Procurement Reporting Mechanism (LPRM) is a set of disclosures that seeks to standardise how the global

mining industry and host countries measure and talk about local procurement. In most cases procurement of goods and services is the single largest in-country payment type by a mine site, and yet to date there has been no commonly accepted way of reporting on the issue. Commissioned by the German Federal Ministry for Economic Cooperation and Development (BMZ) through GIZ and created by the Mining Shared Value initiative of Engineers Without Borders Canada.



## 6.2

# Cautionary Notes

### Forward-looking Statements

Orla has prepared this report based on information available to it at the time of preparation. This report contains certain “forward-looking information” and “forward-looking statements” within the meaning of Canadian securities legislation and within the meaning of Section 27A of the United States Securities Act of 1933, as amended, Section 21E of the United States Exchange Act of 1934, as amended, the United States Private Securities Litigation Reform Act of 1995, or in releases made by the United States Securities and Exchange Commission, all as may be amended from time to time, including, without limitation, statements relating to: the Company’s sustainability strategy, its short-term and long-term sustainability goals, including the timing and anticipated achievement of its goals and targets, and the economic and social benefits to be derived from the Company’s operations and its community programs. Forward-looking statements are statements that are not historical facts which address events, results, outcomes or developments that the Company expects to occur. Forward-looking statements are based on the beliefs, estimates and opinions of the Company’s management on the date the statements are made. Certain

material assumptions regarding such forward-looking statements were made, including, without limitation, assumptions regarding the Company’s ability to execute on its sustainability strategy. Forward-looking statements involve significant known and unknown risks and uncertainties, which could cause actual results to differ materially from those anticipated. These risk factors include those discussed in the “Risk Factors” section in the Company’s most recently filed management’s discussion and analysis, as well as in the Company’s Annual Information Form dated March 18, 2025, both of which are available at [www.orlamining.com](http://www.orlamining.com) or on SEDAR+ and EDGAR. Except as required by applicable laws or regulations, the Company does not undertake to publicly update or review any forward-looking statements.

With the recent addition of the Musselwhite mine to Orla’s portfolio, future sustainability reports may include restatements or adjustments to previously disclosed data to reflect changes in reporting boundaries or methodologies. Any such changes will be transparently noted in the relevant data tables and supporting materials.

## 6.2 Cautionary Notes

### Technical Information

Certain scientific and technical information relating to the:

- Camino Rojo Project is based on and derived from the NI 43-101 report prepared for Orla entitled “NI 43-101 Technical Report, Camino Rojo Project, Zacatecas State, Mexico”, dated July 17, 2025. The open pit mineral resource estimate consists of 79 koz gold of measured resources (3,055 k tonnes at 0.81 g/t gold), 973 koz gold of indicated resources (36,485 k tonnes at 0.83 g/t gold) and 72 koz gold of inferred resources (2,037 k tonnes at 1.10 g/t gold). The underground mineral resource estimate consists of 1 koz gold of measured resources (7 k tonnes at 1.95 g/t gold), 3,949 koz gold of indicated resources (50,079 k tonnes at 2.45 g/t gold) and 396 koz gold of inferred resources (5,576 k tonnes at 2.21 g/t gold). The open pit mineral reserve estimate consists of 103 koz gold of proven reserves (5,972 k tonnes at 0.53 g/t gold) including stockpiles and 752 koz gold of probable reserves (31,923 k tonnes at 0.73 g/t gold). The mineral reserve and mineral resource estimate for the Camino Rojo Oxide Mine has an effective date of March 31, 2025. Mineral resources for Camini Rojo are inclusive of mineral reserves.
- South Railroad Project is based on and derived from the NI 43-101 report prepared for Gold Standard Ventures Corp. entitled “South Railroad Project, Form 43-101F1 Technical Report Feasibility Study, Elko County, Nevada” dated March 23, 2022”. The mineral reserve estimate for South Railroad consists of 333 koz gold of proven reserves (8,960 k tonnes at 1.15 g/t gold) and 1,271 koz gold of probable reserves (56,239 k tonnes at 0.70 g/t gold). The mineral resource estimate consists of 343 koz gold of measured resources (9,561 k tonnes at 1.12 g/t gold) and 1,410 koz gold of indicated resources (65,450 k tonnes at 0.67 g/t gold). The effective date of the South Railroad mineral reserve estimate is February 17, 2022 and the effective date of the mineral resource estimate is January 31, 2022. Mineral resources for South Railroad are inclusive of mineral reserves.
- Musselwhite Project is based on and derived from the NI 43-101 report prepared for Orla entitled “Technical Report, Musselwhite Mine, Ontario,

Canada”, dated November 18, 2024, as well as the updated mineral resource and mineral reserve estimate for the Musselwhite Mine set forth in the Company’s 2024 annual information form dated March 18, 2025. The underground mineral resource estimate consists of 204 koz gold of measured resources (1,505 k tonnes at 4.21 g/t gold), 302 koz gold of indicated resources (2,288 k tonnes at 4.10 g/t gold) and 506 koz gold of inferred resources (3,793 k tonnes at 4.15 g/t gold). The underground mineral reserve estimate consists of 892 koz gold of proven reserves (4,148 k tonnes at 6.69 g/t gold) and 635 koz gold of probable reserves (3,234 k tonnes at 6.10 g/t gold). The mineral reserve and mineral resource estimate for the Musselwhite Mine has an effective date of December 31, 2024. Mineral resources for Musselwhite are exclusive of mineral reserves.

Such information contained herein is subject to all of the assumptions, qualifications and procedures set out in such reports and reference should be made to such reports, which have been filed with the applicable regulatory authorities and are available on Orla’s profile on SEDAR+ and EDGAR. Such reports are intended to be read as a whole, and sections should not be read or relied upon out of context.

The mineral reserve estimate for the Camino Rojo Oxide Mine consists of 103 koz gold of proven reserves (5,972 k tonnes at 0.53 g/t gold) and 752 koz gold of probable reserves (31,923 k tonnes at 0.73 g/t gold). The open pit mineral resource estimate consists of 79 koz gold of measured resources (3,055 k tonnes at 0.81 g/t gold), 973 koz gold of indicated resources (36,485 k tonnes at 0.83 g/t gold) and 72 koz gold of inferred resources (2,037 k tonnes at 1.10 g/t gold). The underground mineral resource estimate consists of 1 koz gold of measured resources (7 k tonnes at 1.95 g/t gold), 3,949 koz gold of indicated resources (50,079 k tonnes at 2.45 g/t gold) and 396 koz gold of inferred resources (5,576 k tonnes at 2.21 g/t gold). The open pit mineral reserve estimate consists of 103 koz gold of proven reserves (5,972 k tonnes at 0.53 g/t gold) including stockpiles and 752 koz gold of probable reserves (31,923 k tonnes at 0.73 g/t gold). The mineral reserve and mineral resource estimate for the Camino Rojo Oxide Mine has an effective date of March 31, 2025.

The mineral reserve estimate for South Railroad consists of 333 koz gold of proven reserves (8,960 k tonnes at 1.15 g/t gold) and 1,271 koz gold of probable reserves (56,239 k tonnes at 0.70 g/t gold). The mineral resource estimate consists of 343 koz gold of measured resources (9,561 k tonnes at 1.12 g/t gold) and 1,410 koz gold of indicated resources (65,450 k tonnes at 0.67 g/t gold). The effective date of the South Railroad mineral reserve estimate is February 17, 2022 and the effective date of the mineral resource estimate is January 31, 2022.

Mineral resources are inclusive of mineral reserves.

### Qualified Person

The scientific and technical information in this report has been reviewed and approved by Mr. J. Andrew Cormier, P. Eng., Chief Operating Officer of the Company, who is the Qualified Persons for this report as defined under the standards of National Instrument 43-101 – *Standards of Disclosure for Mineral Projects* (“NI 43-101”).

### Cautionary Note to United States Investors

This scientific and technical information in this report has been prepared in accordance with Canadian standards for the reporting of mineral resource and mineral reserve estimates, which differ from the previous and current standards of the United States securities laws. In particular, and without limiting the generality of the foregoing, the terms “mineral reserve”, “proven mineral reserve”, “probable mineral reserve”, “inferred mineral resources”, “indicated mineral resources”, “measured mineral resources”, and “mineral resources” used or referenced in this report are Canadian mineral disclosure terms as defined in accordance with NI 43-101 and the Canadian Institute of Mining, Metallurgy and Petroleum (“CIM”) Definition Standards on Mineral Reserves and Mineral Resources adopted by the CIM Council on May 10, 2014 (the “CIM Standards”). For United States reporting purposes, the United States Securities and Exchange Commission (the “SEC”) has adopted amendments to its disclosure rules (the “SEC Modernization Rules”) to modernize the mining property disclosure requirements for issuers whose securities are registered with the SEC under

the Securities Exchange Act of 1934, as amended. The SEC Modernization Rules more closely align the SEC’s disclosure requirements and policies for mining properties with current industry and global regulatory practices and standards, including NI 43-101, and replace the historical property disclosure requirements for mining registrants that were included in Industry Guide 7 under the Securities Act of 1933, as amended (the “US Securities Act”). As a foreign private issuer that is eligible to file reports with the SEC pursuant to the multi-jurisdictional disclosure system, the Company is not required to provide disclosure on its mineral properties under the SEC Modernization Rules and provides disclosure under NI 43-101 and the CIM Standards. Accordingly, mineral reserve and mineral resource information contained in this report may not be comparable to similar information disclosed by United States companies. As a result of the adoption of the SEC Modernization Rules, the SEC now recognizes estimates of “measured mineral resources”, “indicated mineral resources”, and “inferred mineral resources.” In addition, the SEC has amended its definitions of “proven mineral reserves” and “probable mineral reserves” to be “substantially similar” to the corresponding CIM Standards that are required under NI 43-101. While the above terms are “substantially similar” to CIM Standards, there are differences in the definitions under the SEC Modernization Rules and the CIM Standards. There is no assurance any mineral reserves or mineral resources that the company may report as “proven mineral reserves”, “probable mineral reserves”, “measured mineral resources”, “indicated mineral resources”, and “inferred mineral resources” under NI 43-101 would be the same had the Company prepared the reserve or resource estimates under the standards adopted under the SEC Modernization Rules. Accordingly, information contained in this report may not be comparable to similar information made public by U.S. companies subject to the reporting and disclosure requirements under the United States federal securities laws and the rules and regulations thereunder.



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