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# I. <u>PURPOSE</u>

The objective of this document is to establish the guidelines for the operation and use of the Ethics Line

as well as the reporting and investigation protocols.

### II. <u>Scope</u>

This Policy applies to GeoPark Ltd., its subsidiaries, affiliates and/or companies under its control, its

employees and third parties.

### III. GENERAL CONSIDERATIONS

### A. DEFINITIONS

<u>Company:</u> GeoPark Limited, its subsidiaries, affiliates and / or controlled companies.

<u>Ethics Line</u>: It is a free and independent service that guarantees anonymity and confidentiality so that employees can report irregularities detected in the workplace.

<u>Ethics Line Administrator</u>: Independent vendor in charge of receiving complaints or reports through the Ethics Line.

<u>Ethics Committee</u>: Responsible for receiving and analyzing the complaints received. It consists of 3 (three) members, who may be directors of GeoPark Limited, as well as senior officers of the company, indistinctly. Its operation is regulated by a Charter approved by the Audit Committee.

Audit Committee: Audit Committee appointed by the Company every 3 years.

Complaint: Report of situations such as those described in this Protocol, under section III. b)

## **B.** TYPE OF COMPLAINTS/REPORTS

All employees may use the Ethics Line to report situations such as:

- Misappropriation or abuse of assets of the Company;
- Corruption or bribery;
- Money laundering;
- Workplace harassment or other forms of abuse of power or authority (\*)
- Discrimination, racism, sexual harassment;
- Violation of applicable policies and laws;
- Violation of Company regulations;
- Falsification of documentation and information;
- Conflicts of interest;

- Other matters related to irregularities in ethical, legal, accounting, auditing and internal control matters.

(\*) Colombia: This line does not replace, replace or complement the Labor Coexistence Committee in force in Colombia, which enjoys autonomy in handling complaints or reports of matters related to workplace harassment.

## C. PROTECTION AGAINST CLAIMS OF CORRUPTION

The Company may provide protection to those reporting acts of corruption, as appropriate and as defined by the Ethics Committee.

## **D. NO RETALIATION**

Employees who make reports under this Protocol will be protected as long as they disclose information

in good faith, that is, based on a reasonable belief.

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# E. CONFIDENTIALITY AND ANONYMITY

The confidentiality of all complaints will be respected, therefore, the analysis, investigation and results will be kept confidential and will not be communicated to third parties other than those involved in the procedure described in this document.

The Ethics Line system gives anyone the opportunity to file a complaint or concern while remaining anonymous, so it is possible to choose not to share personal data.

# IV. <u>PROCEDURE</u>

# A. RECEIPT OF COMPLAINTS / REPORTS

The Administrator of the Ethics Line will be responsible for receiving all complaints and communications made through the Ethics Line. They may be made by phone or via email, as established by the Company.

Report channels provided by the Administrator of the Ethics Line (Resguarda):

- Email: <u>lineaetica@resguarda.com</u>.
- Website: <u>www.geo-park.com/resguarda</u>
- By phone:
  - · Argentina: 0-800-999-4636
  - Colombia: 01-800-752-2222
  - · Chile: 800-835-133
  - · Brazil: 0-800-891-4636
  - · Perú: 0-800-00932
  - · Ecuador:1-800-000031
  - · Spain: 900-975-278
  - · UK: 0-800-285-1993
  - · USA: 1-800-921-2240
- Other available reporting channels: by directly contacting the Compliance Director or Compliance and / or Internal Control Managers, or by email: <a href="mailto:compliance@geo-park.com">compliance@geo-park.com</a>.

#### **B. REPORTING**

Within 48 hours of receiving the complaint, the Administrator of the Ethics Line will send a report to the Compliance Director and the Internal Control Manager, detailing the code, content and details of the irregularity reported through the line.

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If the complaint involves any of the members of the Ethics Committee, and / or the Compliance Director and / or the Internal Control Manager, the complaint must be sent by the Administrator of the Ethics Line directly to the Chairman of the Audit Committee.

## **C. INVESTIGATION**

### PRELIMINARY REVIEW

The Compliance area will communicate each of the complaints received to the Ethics Committee in order

to establish whether they require an investigation process, or the taking of pertinent actions.

## **RESEARCH & RECOMMENDATIONS**

If, according to the previous preliminary analysis, the complaint requires an investigation process, it may be carried out with internal personnel or with contracted / outsourced personnel, according to determine by the Ethics Committee.

Once the investigation has been carried out, the Compliance area will share the results with the Ethics Committee, including recommendations, corrective actions and sanctions, if applicable, for review and analysis.

The Ethics Committee will issue a decision on the case dealt with, which will be communicated to the complainant through the Ethics Line.

Finally, the Ethics Committee may suggest plans or improvements in processes so that they can be implemented internally in the Company.

## **INTERNAL REPOTS**

On a monthly basis, the Compliance area will send the Ethics Committee a report on the situation of the Ethics Line. Quarterly, the Director of Compliance will send a summary of the situation of the Ethics Line to the Audit Committee, safeguarding confidential data.

## V. <u>RESPONSIBILITY</u>

The administration, updating and disclosure of this Policy are the sole responsibility of the Director of the Legal & Governance Department.

#### VI. <u>REFERENCES</u>

Our Code	
01-01-102	Anti-Bribery & Corruption Policy
01-01-103	Compliance Program against Bribery and Corrupt Practices