

Documento	01 Compromiso	Nombre	Gifts, Donations & Contributions		
Sistema	01 Governance	Sub-Sistema	01 Compliance	País 01. Corporativo	
Código	01-01-104				
Fecha Emisión	09/03/2021	Preparado por	Compliance & Internal Control	Aprobado por	Audit Committee
				Nº Versión	2
				Página	1

I. PURPOSE

This Gifts, Sponsorships, Donations and Contributions policy (the "Policy") is intended to set forth the guidelines for: (i) making donations and charitable contributions in favor of third parties; (ii) receiving and delivering gifts, donations and similar items offered by third parties to GeoPark's employees; and (iii) offering sponsorships for different events and to several education, sport, and cultural entities, among others.

II. SCOPE

This Policy applies to GeoPark Ltd., its subsidiaries, affiliates and/or companies under its control, its employees and third parties engaged (hereinafter, the "Company"), and its suppliers and agents.

III. DEFINITIONS

Government Official(s): Any government authority, officer, official, employee or representative (whether elected or appointed) of a branch or agency of a national, local or municipal government, public office or department (including, but not limited to government-owned or controlled enterprises), or any person acting as official on behalf of a government branch or agency, public office or department; any officer or employee of a public international organization or political party; any candidate to a public office, and any individual considered a government official under the local legislation. For the avoidance of doubt, "Government Officials" include employees of national or state-owned oil companies, or any other company in which the Government has an interest publicly disclosed.

Object or Anything of Value: Money, object or anything of value for the recipient, such as gifts, services, traveling expenses, donations whether for charity or not, or political contributions.

Charity Organization: Non-for-profit organization created to improve the health, the safety, the culture, the community development or the education of a community. It does not include institutions which principal purpose is to promote a political, ideological or religious agenda (for example, political parties, political action committees, churches), although, the expression may include the performance of charity activities supported by an organization with these characteristics (for example, an orphanage sponsored by a religious organization).

Third Party: In very special and exceptional cases, someone different from a Charity Organization/Third Party may receive donations only related to the same purposes stated for the Charity Organization.

IV. GENERAL CONSIDERATIONS

A. DONATIONS AND CONTRIBUTIONS

The guidelines to make charitable donations/contributions are described below:

a. Conditions

The Company may make a donation/contribution to a Charity Organization/Third Party only if the following conditions precedent are met:

- It is made transparently, obtaining a receipt (or equivalent document) after the donation is made;
- The Charity Organization/Third Party to which the donation is made complies with the local legislation;
- It is directly made to the Charity Organization/Third Party (or its bank) within the country where the community is located.
- It is made to a Charity Organization/Third Party located nearby the Company's offices, unless expressly approved; and,
- It is not made under a request, proposal or indication of a Government Official.

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				Nº Versión	2
				Página	2

b. Control and Approval

All donations/contributions shall be previously controlled and validated by the Compliance Manager (or, in his absence, by the person to whom this duty has been delegated) before they are submitted for approval.

If they are validated, the persons with authority to approve them in writing are the following:

Amount	Approvers
Up to USD 10,000	Country Director
USD 10,000 – USD 100,000	Country Director + Director of Legal & Governance Department
More than USD 100,000	CEO

c. Payment Method

The Company shall make donations/contributions directly, without intermediaries. The employee making the donation in the name and on behalf of the Company shall always obtain a receipt (o equivalent document) from the donee, and shall previously consult the Tax Department to analyze the tax effects it may have in accordance with the applicable taxes.

d. Assessment

In order to determine the approval requirements stated in Section "b", donations made in a currency different from the United States dollar, shall be converted into dollars at the exchange rate prevailing for this currency at the time the operation is carried out. Donations "in kind" (that is to say, property purchased or that belongs to the Company) shall be converted into a fair market value in United States dollars to determine the approval conditions stated in Section "b".

B. GIFTS

During business transactions, it is usual for an individual or company to receive or give gifts. Accordingly, the limits and prohibitions are detailed below:

- Employees are prohibited from receiving gifts, payments or similar goods from Government Officials.
- The Company's employees shall not give gifts, make payments or offer similar goods to Government Officials, except for courtesy items, the amount of which shall not **exceed the nominal value of USD 50.**
- The Company's employees shall not receive and/or give gifts or make similar payments from/to Third Parties for an amount **exceeding the nominal value of USD 100.**
- Employees shall not allow any influence that may interfere with the best interests of the Company or affect its reputation.
- Employees who are offered or receive a payment or gift for an amount exceeding the values stated in (b) and (c), shall reject or return it to the person that gave the payment or gift, and explain him/her that the Company's Policy prohibits the acceptance of gifts. In those cases where it is not possible to return the gift, the employee shall send notice to the Director of the Legal & Governance Department (or, in his absence, to the person to whom this duty has been delegated), who will inform the procedure to be followed.

V. COMPLIANCE

VI.

It is prohibited to segregate the amount of donations, contributions, sponsorships and gifts in order to evade any of the limits and/or approval requirements stated in the Policy. A series of donations and/or gifts reasonably related will be considered a single transaction in order to determine the approval levels required by this Policy.

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				Nº Versión	2
				Página	3

All employees shall follow the guidelines of this Policy and ensure and guarantee its compliance before Third Parties and/or staff members.

Any breach of this Policy shall be reported immediately following the guidelines set forth in the Company's Code of Ethics.

VII. EXCEPTIONS

All exceptions to this Policy shall be approved prior to their enforcement by the Director of the Legal & Governance Department (or, in his absence, by the person to whom this duty has been delegated).

VIII. RESPONSIBILITY

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

REFERENCES

- Our Code
- 01-01-102 Anti-Bribery & Corruption
- 01-01-103 Compliance Program against Bribery & Corruption

