

# Code of Ethics





#### GeoPark Team,

Everything we are as a company—our culture, our results, our reputation—is built on the decisions and behaviors of each person who is part of GeoPark. Operating with integrity, responsibility, and respect is not something that can be delegated: it is an individual commitment.

Ethics is fundamental and non-negotiable: it safeguards our reputation, enables our operations and growth, and protects both GeoPark and all the people who are part of it.

Consistent with this belief, we have our Code of Ethics, which establishes the guidelines for acting with honesty, even in complex situations or when the answer is not obvious. This Code reaffirms a deep conviction: doing things well and doing them right requires clear principles, consistent behaviors, and a shared agreement that reflects who we are today and, above all, who we aspire to be in the future.

This Code incorporates international standards, best practices of the industry, the regulatory requirements applicable to the company, and an up-to-date perspective on issues that are essential for any organization that aspires to grow with integrity. It provides concrete examples, decision-making criteria, and guiding questions that help us act responsibly. It also clearly establishes our responsibilities as employees and leaders and includes safe channels to report any concern or inappropriate behavior, with guarantees of confidentiality and non-retaliation.

Most importantly, this Code is a living document. Beyond being a list of rules, it is an invitation to live our values every day. We will review it periodically, strengthen it with the experience and contributions of everyone, and use it as a compass to navigate the ethical challenges of our daily work.

Today, GeoPark faces great opportunities and new challenges. That is why this Code is also a commitment to continuous improvement. I invite you to read it, discuss it with your teams, and above all, embrace it. Because what sets us apart is not only what we do, but how we do it—in every decision, in every action, big or small.

As we present this Code of Ethics, I want to thank you for your trust and commitment, and for helping GeoPark continue moving forward with strength and determination toward the goals we have set for ourselves.

Felipe Bayon V

Chief Executive Officer



### **CONTENT**

INITIAL CONSIDERATION	03
What is the Code of Ethics?	03
Scope	03
Guidance Questions	
OUR VALUES	04
Safety and Health	04
Prosperity	
Employees	
Environment	
Development of Communities	
OUR PRINCIPLES	
RESPONSIBILITIES REGARDING THE CODE OF ETHICS	
Roles of Leaders	
Roles of Employees	
RESPECTFUL BEHAVIOR IN OUR WORK ENVIRONMENT	
Promotion of a Harassment-Free Environment	
Respect for Diversity.	
Commitment to Health, Safety, and Labor Compliance	
SUSTAINABLE PRACTICES IN OUR OPERATIONS.	
Regulatory Compliance  Commitment to Nature and Our Neighbors	
Promotion of Human Rights	
INTEGRITY IN THE MANAGEMENT OF OUR ASSETS.	
Conservation of Our Assets	
Transparency in Our Functions.	
Transparency in Our Procurement Processes	
TRANSPARENT RELATIONSHIPS WITH OUR STAKEHOLDERS	
Zero Tolerance for Bribery and Corruption	
Prevention of Money Laundering and Terrorism Financing	
Compliance with Sanctions and Trade Controls Regimes	
Third-Party Due Diligence	
Proper Management of Conflicts of Interest	11
Commitment to Fair and Free Competition	11
CARE FOR OUR INFORMATION AND CORPORATE IMAGE	
Protection of Information	12
Transparency of Our Reports	
Accuracy of Financial Records	
Proper Use of Insider Information	
Care for Our Image and Reputation	13
Protection of Personal Data	
Responsible Management of Technological Resources	
Control and Supervision of Information	
Ethical Use of Artificial Intelligence	
QUESTIONS AND CONCERNS	
REPORTING WRONGDOING	
CONSEQUENCES OF NON-COMPLIANCE	
PERIODIC UPDATES	
VERSION CONTROL	15

#### INITIAL CONSIDERATIONS



#### What is the Code of Ethics?

As we continue to grow, exploring new geographies and pursuing new opportunities, it is important that we preserve our character and honor the commitments we made at GeoPark when we embarked on this journey of discovery and challenges. A written code will never be entirely complete because we will always face new situations. But what will never change is our determination to act based on our good judgment and follow the path of greatest integrity.

This Code of Ethics defines what we believe in, how we behave, and how we lead, outlining the guidelines that help create a work environment based on integrity and collaboration, supporting our mission and ensuring the sustainable growth of our Company. Our Code serves as a guide for action and decision-making, establishing the principles and values that guide us in our daily lives. We trust that we will all be guided by both the letter and the spirit contained in these pages, and that we will always do the right thing, in the right way.

#### Scope

The Code of Ethics (hereinafter referred to as the "Code") applies to all members of the Board of Directors and employees of GeoPark Limited and its subsidiaries (collectively referred to as "GeoPark" or the "Company"), regardless of their roles, level in the organization, or the jurisdiction in which they are located. This Code also extends to apprentices, interns, temporary employees, contractors, and suppliers acting on behalf of GeoPark, as well as any other third parties representing it.

In the event of a conflict between local regulations and the Code, we will prioritize compliance with the law over the Code. Additionally, any other exceptions to the application of the Code must be authorized by the Board of Directors of GeoPark Limited or one of its committees.

#### **Guidance Questions**

Although our Code establishes various guidelines for conduct, new situations may arise that are not covered by the Code and require our good judgment. In such cases, before taking action, we invite you to consider the following guidance questions that will guide our decision-making process:

- Is this conduct contrary to the rules and regulations applicable to GeoPark?
- Does this behavior oppose our internal policies and procedures?
  - Could this action harm GeoPark's reputation?
  - Does the decision involve disproportionate risks for the Company?
  - Would we feel uncomfortable or embarrassed if this decision were made public?

If the answer to any of these questions is affirmative, we must refrain from that action or decision. If doubts persist, it is necessary to consult the Compliance team for guidance.

#### **OUR VALUES**



Our Code is based on our S.P.E.E.D. Values System (an acronym representing the Company's commitments in five essential areas: **S**afety and Health, **P**rosperity, **E**mployees, **E**nvironment, and **D**evelopment of Communities), which are the key components to ensure value creation and define success for GeoPark:

#### Safety and Health

Everyone should return home each day safe and in good health. People are our most valuable resource, and a company can only achieve success when it effectively protects all those who work on its projects and their families from injury and loss. This requires all of us to know and comply with our safety standards and relevant regulations, and to refrain from engaging in any unsafe or unhealthy tasks. We should also avoid behaviors that could pose risks to ourselves or to those around us. Effective safety management enhances quality and improves efficiency across all sectors of an organization.

#### **Prosperity**

Achieve exceptional results, both operational and financial, to constantly enhance our market value for the benefit of our shareholders. Only a company that is trusted and respected for a track record of operational and financial excellence can endure, attract capital, form partnerships, acquire new projects, and create real long-term benefits. This involves defining an ambitious plan executed diligently and ethically, taking risks proactively and informed—based on the most solid scientific and economic foundations—and being accountable and acting transparently. We think, act, and strive every day to achieve good results, understanding that ethics and transparency are fundamental to achieving them.

#### **Employees**

Create a motivating, fair, and rewarding work environment, with opportunities, mutual respect, and heart, made up of exceptional people. The company that is best positioned to attract, incentivize, and train the best team, with the highest morale, will be the best competitor. This demands that we provide all employees with fair compensation and the opportunity to participate in the Company's success, the chance to contribute and grow, strong management and accountability for results, a workplace free from discrimination or harassment, a clear organizational sense without bureaucratic obstacles, and open access to management to encourage the exchange of ideas.

#### **Environment**

Value our natural resources and minimize the impact of our projects on the environment. As our footprint becomes cleaner and more discreet, our opportunities will expand, opening up more areas for us to work in. Our well-being and long-term survival demand an appropriate coexistence with natural resources and their preservation. This purpose requires us to exceed local environmental standards, regularly assess our operations, fairly restore or compensate for any damage, and explore alternatives to avoid or reduce our impact by applying new technologies or operational methods. We work in our own territories, and therefore, we act with awareness and care.



#### **Development of Communities**

Become the preferred neighbor and partner through a mutually beneficial and sustainable exchange with the local communities where we operate. We want to engage in the daily lives of our communities and work with them based on their priorities. These communities are our home, and we want our neighbors to be active participants and protagonists in the territorial development we promote. Therefore, our approach to relationships in the territories where we operate is based on a culture of good neighborliness. This approach reflects a commitment to continuous and transparent dialogue, and to treating the rights of communities, suppliers, employees, and other stakeholders with dignity and respect.

#### **OUR PRINCIPLES**

This Code is also based on the mutual agreements we made when forming our Company, which are at the core of our intentions and actions. Culture is our most valuable asset and is founded on these principles:

**DO IT NOW:** Plan properly and then act. Do it with passion, energy, persistence, and in spite of challenges.

**DO IT RIGHT:** Act correctly and with integrity, pride, and responsibility. Use metrics and report results accurately. Excel in safety and environmental care.

**DO IT EFFICIENTLY:** Do more with less. Complete work fully and on time. Focus on quality, eliminate waste, and avoid bureaucracy. Use every dollar as if it came from our own pocket.

**DO IT BETTER:** Question the status quo. Conceive and embrace change. Our failures can lead to unexpected solutions. Seek and apply the best knowledge and unlock the team's potential. Improve every day.

**DO IT BIG:** Build for the long term. Be bold and envision possibilities. Success can be unlimited, and victory does not mean the failure of others. Think big and face the challenges ahead.

**DO IT FOR EACH OTHER:** Trust and support one another. We are all owners of the Company and its results. Listen and give opportunities to those above and below us. Acknowledge and be grateful for our success.

## GEOPARK

#### RESPONSIBILITIES REGARDING THE CODE OF ETHICS

#### Roles of Leaders

Leaders at GeoPark play a fundamental role in promoting a culture of ethics and compliance. Their commitment sets a standard of behavior and helps create an environment of integrity. Therefore, they have the following responsibilities regarding the Code:

- Promote an ethical culture and serve as role models, demonstrating their commitment to high standards of integrity through actions consistent with our values and ethical principles.
- Stive to ensure that all employees understand their obligations under internal policies and applicable regulations, as well as facilitate training for their teams on ethics and compliance.
- Foster open communication and create an environment where employees feel safe to express concerns, ask questions, and report inappropriate behavior.
- Report to the Compliance department or through the Ethics Line any inappropriate conduct they may observe or be aware of.
- Apply fair and consistent disciplinary measures against employees who violate the Code, ensuring that their teams understand the importance of maintaining ethical behavior.
- Ensure that the company's strategic goals and objectives are aligned with GeoPark's ethical principles and values, guaranteeing that all decisions reflect our commitment to integrity.
- Assess behaviors related to the Code when evaluating employees, making promotion decisions, and assigning responsibilities.
- Protect confidentiality and ensure that there are no reprisals against those who report violations of the Code in good faith.

#### Roles of Employees

At GeoPark, every employee plays a crucial role in our Code compliance, and the responsibility to act with ethics and respect toward others is shared and fundamental to fostering an environment of integrity. Therefore, each employee has the following specific obligations regarding this Code:

- Always comply with applicable laws and regulations.
- Perform duties responsibly by evaluating risks in the processes, establishing controls to ensure the activities under each one's responsibility, and adopting the principle of self-control.
- Act fairly, transparently, and respectfully toward our colleagues, clients, suppliers, competitors, and stakeholders, avoiding any improper personal benefit or unfair dealings.
- Act in the best interest and benefit of GeoPark, refraining from gaining undue advantages from



our position or functions, from the information to which we have access, or from the company's resources and assets.

- Diligently cooperate in any investigation or request for information regarding potential violations of the Code, whether internal or from the authorities.
- Seek guidance and support when doubts arise about how to proceed correctly or when facing ethical dilemmas.
- Timely and in good faith, report inappropriate conduct, using reporting channels responsibly and safeguarding the reputation of others, keeping in mind that it is mandatory to report situations that may constitute legal violations.

#### RESPECTFUL BEHAVIOR IN OUR WORK ENVIRONMENT

At GeoPark, we are committed to creating a safe, respectful, and inclusive work environment where every employee feels valued. Therefore, we must all ensure compliance with the following guidelines in our workplace and in our interactions with other employees and stakeholders:

#### Promotion of a Harassment-Free Environment

We foster a work environment based on respect and the dignity of everyone, rejecting any form of violence, intimidation, or workplace harassment. This includes the rejection of disparaging comments, aggressive behavior, threats, intimidation, and marginalization, as well as any conduct that systematically or repeatedly undermines a person's integrity, physical or mental health, or working conditions, creating a hostile environment.

We also reject any form of sexual harassment, understanding it as any unwanted sexual behavior that creates a hostile, intimidating, or humiliating environment, including inappropriate comments, insinuations, unwanted contact, or requests for sexual favors. This applies not only to the workplace but also to any environment related to work activities and to all facilities and contexts where there is interaction between employees or with our stakeholders.

#### Respect for Diversity

We deeply value diversity and promote inclusion in all our work environments. We reject any form of discrimination or violence based on gender, race, ethnicity, nationality, language, religion, political ideology, beliefs, sexual orientation, disability status, age, marital status, and other factors. We foster a culture where everyone's opinions are heard and respected, and where equal opportunities and fair, equitable, and non-discriminatory compensation are key principles in our employment practices, working conditions, and supplier selection.



#### Commitment to Health, Safety, and Labor Compliance

We fulfill our labor obligations regarding social security, legal minimum wage, and health and safety in the workplace, in accordance with applicable laws, internal regulations, and relevant international conventions. We also prioritize the protection of our physical and mental health and well-being, as well as that of our colleagues, contractors, and other third parties in our facilities.

We foster a culture of prevention and self-care, promptly reporting accidents, unsafe conditions, or regulatory non-compliance. We properly use personal protective equipment, utilize work tools and equipment according to usage instructions, suspend unsafe practices, and timely communicate potential risks to our health and well-being. Additionally, we monitor compliance with these obligations by our contractors and suppliers.

#### SUSTAINABLE PRACTICES IN OUR OPERATIONS

We firmly believe that it is essential to develop our operations responsibly and sustainably, seeking the well-being of our employees and stakeholders, and strengthening the trust of our investors. To achieve this, we conduct our business activities according to the following principles:

#### **Regulatory Compliance**

We promote regulatory compliance within our organization and seek adherence to applicable laws and regulations, including commercial, labor, tax, customs, environmental, intellectual property regulations, and other relevant sector regulations. We reject the violation and evasion of any law or regulation, as well as the omission of the Company's policies.

#### Commitment to Nature and Our Neighbors

We are committed to complying with environmental regulations and social responsibility standards, as well as with the legal and voluntarily adopted commitments.

We seek to prevent, mitigate, correct, and compensate for the environmental impacts resulting from our activities, managing the risks associated with climate change and biodiversity loss. We promote the sustainable management of water and optimize its consumption, and we implement principles of circular economy throughout our value chain. Additionally, we constantly monitor technological, regulatory, and market advancements to achieve our emission reduction goals and continuously improve our environmental performance.

We also strive for the sustainable development of the communities where we operate, promoting trust and collaborative relationships with our neighbors, fostering inclusion, and driving initiatives that seek to create value and share prosperity. We value local talent and aim to build fair and beneficial partnerships, ensuring that our actions respect the culture and environment of the communities while working together to contribute to sustainable development in the areas where we operate.



#### **Promotion of Human Rights**

We respect and promote the universally recognized human rights and freedoms established in national regulations and international treaties and conventions, as well as in our internal policies. We categorically reject any action, omission, or practice that undermines, restricts, or denies human rights, whether directly or indirectly, including, among others, forced labor, discrimination, child labor, human trafficking, slavery, kidnapping, forced displacement, violations of the right to associate and freedom of association, corporal or verbal abuse or punishment, and any other form of infringement on human dignity. Furthermore, we are committed to identifying and managing any risks that may affect human rights in our operations and to working with our partners and suppliers to ensure they share this commitment.

#### INTEGRITY IN THE MANAGEMENT OF OUR ASSETS

We are honest and transparent in the management of our resources. We take measures to care for and efficiently manage our assets, tools, equipment, and facilities, rejecting any form of fraud, misappropriation, or misuse of them. To ensure these principles, we adopt the following behaviors:

#### Conservation of Our Assets

We care for and protect our assets, resources, property, facilities, tools, and equipment, ensuring their responsible and efficient use in accordance with our business purposes. We refrain from unauthorized appropriation of these resources, as well as from mismanaging, wasting, or using them improperly for personal benefit, that of our family members, or business associates. We utilize the Company's resources following corporate usage instructions and reject any use of these assets for fraudulent activities.

#### Transparency in Our Functions

At GeoPark, we act with honesty and responsibility, rejecting any behavior that seeks to gain commercial or personal benefits through dishonest practices or to the detriment of the company. We are committed to promoting GeoPark's legitimate interests in all transactions and negotiations we undertake on behalf of the Company, as well as in the performance of our duties. Therefore, we refrain from participating, either directly or indirectly, in any form of fraud or deception aimed at gaining an unfair advantage or improperly benefiting from the Company's resources.

For the care of our resources and the proper exercise of our functions, we comply with internal policies and controls under our responsibility, respecting our attributions, powers, and levels of authority. Additionally, we recognize that it is prohibited to take advantage of opportunities related to the use of GeoPark's resources, the information we have access to, or our position to obtain personal or family benefits.

#### **Transparency in Our Procurement Processes**

We consider our suppliers and contractors as allies in the success of our business, selecting them through fair, transparent, and competitive processes based on objective criteria such as quality, price,



experience, and compliance with technical requirements. Under no circumstances do we request or accept favors, gifts, hospitality, or valuable items during the decision-making process for contracting that could compromise our objectivity, and we reject any commission, perk, or favor from suppliers. Additionally, we ensure that contractual conditions are clear, detailing the services to be provided and guaranteeing that compensation is proportional to the goods or services contracted. Additionally, we monitor the proper execution of contracts and verify that our suppliers comply with applicable regulations.

#### TRANSPARENT RELATIONSHIPS WITH OUR STAKEHOLDERS

We are committed to always conducting our business in compliance with applicable laws and fostering an environment of transparency and trust that allows us to build strong and sustainable relationships with our business partners in the long term. To achieve this, we follow these conduct guidelines:

#### Zero Tolerance for Bribery and Corruption

We are committed to complying with anti-corruption regulations and reject bribery of public officials, whether national or foreign. We prohibit promises, offers, payments, or the giving of money or anything of value to government officials, made directly or indirectly, through intermediaries or individuals acting on behalf of the company, with the intention of obtaining or retaining business or securing any other undue advantage.

We are careful in managing gifts, courtesies, travel expenses, entertainment, hospitality, donations, sponsorships, and contributions, ensuring that they have a legitimate business purpose, are of reasonable value, and comply with business practices, applicable regulations, and our internal policies. These should be given openly and properly documented in the Company's books and records, and they must never be offered with the intention of obtaining favors or undue advantages, nor to influence the decisions of the recipients.

We maintain a responsible approach in our relationships with authorities and avoid any interaction with government officials that may appear irregular. In addition, before entering into agreements or contracts with authorities or individuals linked to the public sector, whether currently or in the past, we conduct a thorough review of the applicable regulations to ensure compliance with all regulatory requirements and respect the relevant disqualification and incompatibility rules.

#### Prevention of Money Laundering and Terrorism Financing

We maintain a firm stance against any conduct that constitutes money laundering, terrorist financing, or the financing of the proliferation of weapons of mass destruction. Therefore, we always comply with the standards, internal policies, and controls adopted to prevent these risks. This means we will refrain from participating, either directly or indirectly, in any activity that seeks to conceal or give the appearance of legality to resources obtained through criminal activities. Besides, under no circumstances do we provide financial support or favors to illegal armed groups or activities that may imply support for terrorist organizations, nor do we endorse any third party to provide support to these



armed organizations.

#### Compliance with Sanctions and Trade Controls Regimes

We comply with import and export controls, as well as with the regime of economic and trade sanctions, anti-boycott regulations, and restrictions on doing business with certain sanctioned countries, individuals, or entities. This includes a strict prohibition on conducting transactions or establishing business relationships with individuals designated on binding control lists, as well as with third parties located in countries subject to restrictions.

#### Third-Party Due Diligence

We conduct compliance due diligence procedures before establishing business or contractual relationships with third parties and periodically throughout these relationships to effectively manage the risks of corruption, money laundering, terrorism financing, and non-compliance with sanctions regimes. Additionally, during the execution of contracts, we remain vigilant for any potentially improper or illegal conduct and promptly report any alerts, unusual activities, or suspicious operations to the Compliance team.

#### Proper Management of Conflicts of Interest

We report any conflicts of interest in a timely manner to the Compliance department and take appropriate measures to manage these situations and the associated risks.

Conflicts of interest refer to circumstances in which our personal interests may conflict with those of GeoPark, affecting or appearing to affect the impartiality, objectivity, and independence of our decisions. These situations may arise from, among other factors, external activities, family, romantic, or business relationships with customers, suppliers, employees, partners, competitors, or other stakeholders, as well as personal or business links with authorities or government officials.

When facing conflicts of interest, we adhere to the defined management measures and remind ourselves that it is prohibited to engage in external activities that compete with GeoPark, as well as any activities that may result in undue personal benefits or that could be interpreted as an abuse of our position, the company's assets, or the information to which we have access.

#### Commitment to Fair and Free Competition

In GeoPark, we compete fairly and transparently, fully respecting competition, antitrust, and fair trading laws. Therefore, we refrain from engaging in any practices or unilateral actions that limit or restrict market access or free competition, constitute an abuse of a dominant position, or involve unfair competition.

Additionally, we ensure that our business decisions are made autonomously and independently, rejecting any agreements with competitors, whether written or verbal, that seek to restrict or limit the normal functioning of the market, including agreements related to prices, customers, markets, or territories. Furthermore, we are cautious in our interactions and communications with competitors, as well as in meetings of industry groups or trade associations, refraining from exchanging sensitive



or confidential information. In the case of mergers, acquisitions, or business integrations, we involve the Legal team to ensure compliance with all applicable regulations and legal requirements.

#### CARE FOR OUR INFORMATION AND CORPORATE IMAGE

In GeoPark, we understand that information is a fundamental asset that enables us to make informed strategic decisions, ensure regulatory compliance, and preserve our reputation. Therefore, it is essential that we apply the following principles in the management of our information and communication assets:

#### **Protection of Information**

We adequately protect and safeguard the Company's information, using it exclusively for business purposes and avoiding unauthorized use, disclosure, appropriation, or extraction for personal purposes. We implement protective measures for GeoPark's confidential or non-public information, ensuring that it is only accessible to those who have a legitimate need for access, where disclosure is authorized, or as legally required. Any disclosure of information in response to a legal request or from a competent authority must be validated in advance by the Legal department.

#### Transparency of Our Reports

The information we share with shareholders, authorities, and other stakeholders must always be truthful, complete, and accurate, ensuring that its publication and preparation are conducted honestly and in compliance with our internal disclosure controls and procedures. All reports and documents from GeoPark must faithfully reflect the Company's transactions and operations, and it is prohibited to alter, falsify data, or create misleading records.

#### **Accuracy of Financial Records**

We maintain a strong commitment to the integrity of our books and financial records, ensuring they are accurate and fairly reflect all financial transactions and asset dispositions, without attempting to conceal or misrepresent information for the purpose of granting bribes or committing fraud. At GeoPark, we have internal controls in place to ensure the quality and accuracy of financial information, and it is the responsibility of everyone to execute them correctly and report any irregularities or concerns regarding the veracity of the financial records. Additionally, we ensure that all financial information presented to investors, authorities, and regulators is complete and truthful.

#### Proper Use of Insider Information

We refrain from using the Company's information for personal gain. It is expressly prohibited to use the information we have access to due to our position to make decisions regarding the purchase or sale of GeoPark shares or securities, as well as to advise third parties to engage in such transactions.

For more information on the rules regarding the sale of shares by employees, please refer to the Insider Trading Policy.



#### Care for Our Image and Reputation

We are careful with public statements about GeoPark to protect the Company's reputation and good name. Therefore, information disclosed to the media, authorities, financial analysts, or the public on behalf of GeoPark must be pre-approved by the Connections team or issued by designated spokespersons or responsible parties.

#### **Protection of Personal Data**

If we collect or process personal data in the course of our work, we must handle it in accordance with applicable regulations and our internal policies. We implement reasonable security measures to protect privacy and ensure restricted access to personal data, preventing unauthorized access, loss, or improper disclosure, especially when handling sensitive personal data.

#### Responsible Management of Technological Resources

We responsibly use technological resources, including the data they contain and the software they operate with, as well as the communication tools provided by the company, maintaining necessary security measures and properly managing users, permissions, and access keys to the systems. We refrain from installing unauthorized software, accessing websites, or sending emails with offensive or legally prohibited material. Additionally, we respect copyright and intellectual property rights, using only properly authorized software and licenses.

#### **Control and Supervision of Information**

As responsible parties for the information on the technological and communication devices provided by GeoPark, we acknowledge that the Company has the right to access and monitor the information stored in these systems, as well as to control and inspect our use of the technological tools and communication means provided by the Company.

Furthermore, we acknowledge that all information generated or received by GeoPark employees, regardless of the medium or format, whether physical or digital, is the exclusive property of GeoPark. This includes information acquired from third parties, as well as any data developed, constructed, or created during the performance of job duties. Therefore, employees are not authorized to remove or copy such information without prior and express authorization from their immediate supervisor. Additionally, upon concluding our relationship with GeoPark, we must return all data, information assets, and technological tools provided, and the extraction of data or information from the Company is expressly prohibited.

#### Ethical Use of Artificial Intelligence

We employ artificial intelligence in an ethical and responsible manner, ensuring that its use is legitimate and complies with applicable regulations and the information security policies and technological resource usage adopted by GeoPark. We recognize that artificial intelligence is an enabling tool and not an unsupervised replacement for people and functions; therefore, we are committed to providing appropriate human oversight, evaluating the reliability of generated content,



and considering the potential risks associated with these technological solutions.

Additionally, when using artificial intelligence tools, we take measures to protect confidential information and personal data, respect copyright, and avoid the misappropriation of third-party information, maintaining transparency about the use of these tools.

#### QUESTIONS AND CONCERNS

This Code is not intended to anticipate all situations or answer every question that may arise in the daily exercise of our duties. Therefore, if doubts arise regarding the application of the Code or if we face dilemmas in decisions on unregulated aspects, it is essential to consult our leaders or the Compliance team for guidance and to clarify any concerns.

#### REPORTING WRONGDOING

It is our responsibility to promptly report any incorrect, illegal conduct, or actions that violate our Code and its associated policies to our supervisors, the People team, the Compliance department, or through the Ethics Line:

Mailbox: lineaeticageopark@resguarda.com
 Web Form: RSG | Ethic Line (resguarda.com)

• Phone:

(i) Argentina: 0-800-999-4636 | 0-800-122-7374

(ii) Brazil: 0-800-891-4636 (iii) Colombia: 01-800-752-222 (iv) Ecuador: 1-800-000031 (v) Spain: 900-975-278

(vi) United States: 1-800-921-2240

(vii) United Kingdom: 0800 285 1993 | 800-041-8214

To ensure a proper investigation that allows for necessary measures and corrective actions, it is essential that reports are made responsibly and in good faith, providing as much detail as possible and refraining from making allegations intended to unfairly damage the reputation of others or that contain false accusations made maliciously. Good faith reports are those where there is a genuine concern and the belief that the information provided is accurate and truthful, even if it later turns out to be incorrect.

We promote an environment where everyone feels safe and supported when reporting unethical behavior. To protect whistleblowers, we offer the option for reports to be made anonymously through the Ethics Line, a reporting channel operated by an independent third party.

We also ensure the confidentiality of reports, and under no circumstances will threats, intimidation, disciplinary measures, retaliation, or any other forms of reprisals be allowed against whistleblowers acting in good faith or individuals who cooperate in investigations. Such situations should be reported



to the Compliance team or through the Ethics Line to ensure the protection of the whistleblower.

#### **CONSEQUENCES OF NON-COMPLIANCE**

Non-compliance with the Code may result in disciplinary measures ranging from warnings to termination of employment or contractual relationships, depending on the severity of the situation and always respecting due process. Additionally, it could lead to legal or administrative actions against GeoPark or its employees in accordance with applicable regulations.

#### PERIODIC UPDATES

The Code may be updated based on new risks in GeoPark's operations and business, as well as recommendations from employees and directors. Modifications to applicable regulations and the identification of standards and best practices that contribute to the prevention of misconduct will also be considered. In any case, the need to update the Code will be evaluated at least every two years to ensure its effectiveness.

#### **VERSION CONTROL**

VERSION	DATE	DESCRIPTION
01	24/09/2012	Creation of Code of Ethics
02	Pendiente	Comprehensive Update of the Code of Ethics

