

System	05 People	Sub-System 01 People	Country 01. Corporate	
Code	05-01-103			
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I. General

GeoPark does not tolerate and vehemently rejects any conduct constituting sexual harassment or other forms of gender-based violence or discrimination in the workplace. Through this protocol the Company expresses its commitment to promoting a healthy environment of work coexistence, respecting the dignity and integrity of people within the framework of work-related activities.

Accordingly, this document establishes guidelines to prevent, detect, correct and discipline gender-based violence of any description. This document applies to all workers, contractors, service providers and all our stakeholders in our workspaces. This protocol incorporates the guidelines and principles of the Code of Conduct, the Commitment to Equality, Inclusion and Diversity, and the Commitment to Human Rights.

II. Objectives

- 2.1. To contribute to the well-being of employees and stakeholders through fostering safe environments that prioritize respect for individual rights. This protocol thus

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serves as a resource for information, prevention and response to any conduct constituting gender-based violence within GeoPark or in the context of its relationships with stakeholders.

- 2.2. To create strategies to prevent sexual harassment in the workplace and gender-based discrimination and violence.
- 2.3. To develop procedures to prevent the conduct indicated in paragraph 2.2 and to receive and process related complaints, as well as procedures to protect and care for people who may be victims.
- 2.4. To contribute to the prevention and elimination of any form of discrimination and violence related to gender identity, sexual identity, sexual orientation and sexual diversity.
- 2.5. Disseminate information regarding prevention mechanisms, procedures for filing complaints with competent authorities, and assurances of non-repetition.

III. **Scope**

This document covers and is applicable to all workers, within and beyond workplaces and in the context of work activities. This protocol also applies to contractor companies, service providers, trainees, interns, business partners and stakeholders who carry out activities in GeoPark's facilities.

IV. **Regulatory framework**

International frameworks for preventing, addressing, investigating, and penalizing sexual harassment in the workplace.

- 4.1 Law 2365 of 2024, which adopts measures for the prevention, protection and response to sexual harassment in the workplace and higher education institutions in Colombia and which includes other provisions – applicable in Colombia.
Convention on the Elimination of All Forms of Discrimination against Women – CEDAW (Recommendation N^o.19 Violence Against Women, 1992).
- 4.2 Discrimination (Employment and Occupation) Convention – ILO, 25 June 1958.
- 4.3 Sexual harassment – ILO, 21 October 2013.
- 4.4 Convention on Violence and Harassment – ILO, 21 June 2019.
- 4.5 Violence and Harassment Recommendation – ILO, 21 June 2019.
- 4.6 Inter-American Convention on the Prevention, Punishment and Eradication of Violence against Women – Belen do Para – OAS, 1994.
- 4.7 Resolution of the International Labour Conference on Equality of Opportunity and Treatment for Workers in Employment (1985).
- 4.8 Nairobi Forward-Looking Strategies for the Advancement of Women (1985)
- 4.9 Platform for Action of the Fourth World Conference on Women (Beijing 1985)

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V. **Principles and guidelines**

- 5.1. **Due process:** The application of due process will be guaranteed with full guarantees of the rights of presumption of innocence, impartiality, defense and contraction.
- 5.2. **Safe and healthy work environment:** In order to guarantee work in dignified conditions, every person who provides services for the Company must have a safe and healthy environment, with conditions that allow them to perform their duties in an environment free of physical and emotional risks caused by possible acts of workplace harassment through sexual and/or gender-based discrimination.
- 5.3. **Equality:** Equal treatment will be guaranteed under conditions of respect for all the Company’s workers. People responsible for developing the protocol will give the same treatment and protection to the people involved in the actions within their knowledge; prioritizing and providing special protection to victims, who are in unequal circumstances of weakness.
- 5.4. **Efficiency and impartiality:** Responsible parties for each process will seek to ensure that respective processes achieve their purpose and, will accordingly act impartially and objectively.
- 5.5. **Speed:** Procedures will be facilitated and the adoption of information and communication technologies emphasized to ensure that processes are conducted efficiently and without undue delay.
- 5.6. **Confidentiality:** Individuals involved in the procedures to prevent, correct and respond to sexual harassment in the workplace, and in the administration of personal data, must guarantee the corresponding confidentiality and provide the information and data only when it is warranted for the development of authorized activities, protecting the rights of those involved.
- 5.7. **Non-discrimination:** Equality in treatment will be guaranteed, without prejudice, stereotypes and biases associated with sex, gender identity, sexual orientation, ethnicity, disability and other differential conditions. This will be essential to address situations of gender-based sexual harassment and/or discrimination in the workplace.
- 5.8. **Non-revictimization:** The Company will ensure that the victim receives care in a secure environment designed to prevent recurrence or re-exposure to the

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circumstances that infringed upon their right to a life free from violence, and that places them in the position of victim again.

VI. Definitions

6.1. **Workplace harassment:** Any persistent and demonstrable conduct subjected on a worker by an employer, a boss or immediate or intermediate hierarchical superior, a co-worker or a subordinate with the objective of frightening, intimidating, and causing terror and anguish, creating detrimental effects and demotivation at work or inducing resignation from work.

6.2. **Sexual harassment in the workplace:** Any harassment, persecution or physical or verbal pressure for non-consensual sexual purposes that offends, humiliates and/or intimidates the worker, regardless of a hierarchical relationship. According to the International Labor Organization (ILO), the following main characteristics define sexual harassment:

- A behavior of a sexual character or tone
- Unwelcome to the recipient
- Perceived by the victim as hostile to their work, making work a humiliating situation for them.

According to the Convention on the Elimination of All Forms of Discrimination against Women (Recommendation 19), sexual harassment includes sexual behaviors such as physical contact and innuendo, sexual observations, exhibition of pornography and sexual demands, whether verbal or physical.

6.3. **Discriminatory act:** One that arbitrarily impedes, obstructs or restricts the full exercise of the rights of persons based on their race, nationality, sex or sexual orientation or disability, or for other discriminatory reasons.

6.4. **Discrimination against women and gender:** Any distinction, exclusion, or restriction based on sex or sexual orientation that aims to, or results in, impairing or denying people from LGTBQ+ communities their human rights and freedoms, including labor rights.

6.5. **Violence against women or gender:** Any action or behavior based on belonging to the female sex or affiliation with LGTBQ+ communities that has or may result in death, physical, sexual or psychological harm or suffering, as well as threats of such acts, coercion or deprivation of liberty, whether they occur in public or private settings. Violence is the most serious manifestation of discrimination.

6.6. **Digital gender-based violence:** Gender-based violence that transcends the physical environment and is transferred to digital settings where they are enhanced by ICTs.

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It includes acts of gender-based violence partially or wholly instigated or aggravated by the use of ICTs. It includes various crimes and behaviors such as trafficking, pornography, extortion, hate speech, prejudice to privacy, and threats to the free development of personality and against personal integrity. Such behaviors can cause psychological and emotional damage, reinforce prejudices, damage reputations, generate economic losses and lead to other forms of physical and sexual violence.

VII. Forms of manifestation of sexual harassment in the workplace and discrimination related to gender-based violence

Behavior that constitutes sexual harassment and/or discrimination or violence due to gender or sex in the workplace includes the following non-exclusive examples through violating sexual freedom:

- Comments or insinuations about a person’s physical appearance, sexuality or body, as well as comments or jokes of a sexual nature.
- Unnecessary and non-consensual physical contact, constant and/or improper approaches or touching, inappropriate or lecherous looks with sexual connotations.
- Sexual gestures, kisses, hugs, blocking or attempting to block a person’s movements to subject them to sexual behavior.
- Variations in workloads or work tasks as a way of exerting pressure on sexual behavior.
- Non-consensual exhibition of pornographic material: videos, images and other communications of an offensive nature. Using and/or displaying sexually explicit or suggestive images, videos, films, magazines, graphics, vignettes, photographs, or drawings.
- Dissemination of rumors, orientations, private practices of a sexual order of people.
- Asking about stories, fantasies or sexual preferences or about sex life, generating humiliation or discomfort in the victim.
- Forcing the performance of activities that are not within a person’s functions or other disciplinary measures for refusing sexual proposals.
- Physical aggressions of a sexual nature
- Repeated requests for appointments and/or meetings outside of working hours that generate humiliation or discomfort in the victim.
- Demands for sexual behavior, with or without proposed rewards or under duress or threats (explicit or implicit).
- Demands or requests for sexual favours, in order to improve working conditions or job continuity.
- Exercise of coercion, under threats, that intimidate the person and frighten or subjugate them, or that modify their behavior.
- Directly displaying genitals or through videos or photos.

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- The conditioning of access to employment, of a condition of employment or of the maintenance of employment, on the acceptance by the victim of a sexual favor, even if the explicit or implicit threat in that condition is not effectively fulfilled.
- Clandestine observation of people in reserved places such as bathrooms.
- Attempted rape or rape.
- Publicly and repeatedly disqualifying a person and their work based on their sex or sexual orientation.
- Jokes or questions of a sexual nature that humiliate the victim or create discomfort.
- Comments of hate, rejection and violence based on sexuality.
- Contemptuous comments about a gender.
- Leaving or delivering notes with sexual connotations or referring to sexual orientation or gender.
- Carrying out discriminatory acts or behavior based on gender or sexuality.
- Sending text messages, messages on mobile devices, social networks or emails of a sexual nature, or that intimidate or humiliate based on gender or sex.
- Jokes of a sexual nature or that contain gender violence or discrimination against women.
- Disseminating images, videos, rumors or data of sexual content about a victim on the Internet, whether true or false.
- Pursuing and inconveniencing a victim in online spaces that they regularly frequent.

VIII. Rights of victims of sexual harassment and/or discrimination or violence related to gender or sex in the workplace

As a Company responsible for Human Rights, we will provide support and protection to anyone who feels that they are a victim of sexual harassment, violence or discrimination in the workplace. Complaints may be made through a) the Equality, Inclusion and Diversity Committee (EIDC), b) the Ethics Hotline or c) any communication mechanism.

The Company is committed to listening to everyone in good faith and with confidentiality, avoiding retaliation of any kind. At the appropriate time in respective processes, we will provide information on the procedures for making complaints to competent authorities.

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IX. Measures to prevent gender-based violence, discrimination and sexual harassment in the workplace

- Realize dissemination and awareness actions about this Protocol in GeoPark’s different internal communication channels (intranet, email and other digital means available to the Company).
- Implement continuous training for all staff, focusing in particular on team leaders to detect and manage complaints of any type on gender-based violence and especially sexual harassment in the workplace.
- Develop diagnosis strategies to detect possible transgressions of people’s rights due to their sexual orientation and adopt actions aimed at preventing and avoiding any manifestation of marginalization, gender and sexual violence.
- Deliver continuous training on gender-based violence, with a special focus, for the members of the Equality, Inclusion and Diversity Committee (EIDC), the Extended Team (ET), the People area and Health & Safety.
- Implement mechanisms to monitor compliance with the protocol.
- Furthermore, GeoPark is committed to promoting respect for human rights and the observance of the behaviors and values required of its employees at all levels.

X. Composition of the Equality, Inclusion and Diversity Committee - EIDC

The Equality, Inclusion and Diversity Committee (EIDC) will represent the following areas and positions:

Nº.	Area	Position
1	People	Chief People Officer
2	Connections	Direct Connections
3	Sustainability	SPEED Manager - Sustainability
4	Nature & Neighbors	Nature and Neighbors Manager
5	Attraction and Diversity	Attraction & Diversity Manager

Annex #1 provides the names of the people that exercise the related positions.

If any of the above persons on the EIDC retire, their replacement must be appointed within a maximum period of one month. The EIDC may activate the Extended Team (ET) if required.

The following areas and positions make up the Extended Team. Annex #1 provides the names of the people who are exercising the positions in the ET.

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Nº.	Area	Position
1	People	Compensation and Organizational Design Director
2	People	Close to People Director
3	Legal	Legal Leader
4	Compliance	Compliance Leader
5	HS and Physical Security	HS & Physical Security Manager

XI. Procedure for the presentation and processing of complaints of gender-based violence, discrimination and sexual harassment in the workplace.

1. Receipt of the complaint:

When a worker considers that they are a victim of gender-based violence, discrimination and sexual harassment in the workplace, they may file a complaint through the following reporting mechanisms:

- a) By email to the Equality, Inclusion and Diversity Committee (EIDC) comiteeid@geo-park.com
- b) By email lineaeticageopark@resguarda.com, the web form available at RSG | Reporting Channel (www.resguarda.com) or by telephone to the Ethics Hotline. The line administrator will forward the case to the Equality, Inclusion, and Diversity Committee.
 - Argentina: 0-800-999-4636 | 0-800-122-7374
 - Brazil: 0-800-891-4636
 - Colombia: 01-800-752-2222
 - Ecuador: 1-800-000031

Notwithstanding the foregoing, when a complaint is received by an immediate manager, area leader or by the People area, it must be transferred immediately and in absolute confidence so that the Equality, Inclusion and Diversity Committee can take the corresponding actions.

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2. Analysis and management of the complaint submitted:

- a) Equality, Inclusion and Diversity Committee (EIDC) awareness of the complaint.
- The Equality, Inclusion and Diversity Committee (EIDC) will be responsible for processing and managing the complaint.
 - Without prejudice to the EIDC report, the victim of gender-based violence, discrimination or sexual harassment in the workplace may go directly to the competent authorities.
 - The complaint cannot be anonymous and must contain a detailed account of the facts or behavior to which the person was or is being subjected, identifying the person engaging in the harassment and, if possible, evidence demonstrating the occurrence of the alleged events. The person filing the complaint will not be obliged to reveal intimate aspects or those that they do not consider relevant to stating facts.
 - At this stage, it is also important to document the conditions of the alleged victim that could lead to them retracting what they state in the complaint. Factors such as the relationship of subordination to the alleged aggressor, the existence of threats or possible reprisals that have an impact on their employment must be recorded.
 - If allegations of gender-based violence, discrimination or sexual harassment in the workplace are made regarding any member(s) of the EIDC, they must be handled by the respective alternates, and the member may not be part of the investigation and analysis of the case.
 - All complaints will be processed and managed with absolute confidentiality and impartiality.
- b) Processing of the complaint filed with the Equality, Inclusion and Diversity Committee
- After receiving the complaint, the EIDC will convene an initial meeting of its members for review and analysis.
 - The EIDC will then respond to victims informing them that it acknowledges the complaint filed and that victims have the option of filing a pertinent complaint with the competent authorities.
 - At the same time, the EIDC will carry out an initial investigation to review the need to adopt urgent measures to protect the victim.
 - The EIDC must then summon and listen to the people involved, separately.
 - Once the parties involved have been heard, the EIDC will carry out an investigation based on the information provided.
 - On completion of the investigation, the EIDC will prepare a report with the information collected and will issue the conclusion on the existence or not of gender-based violence, discrimination or sexual harassment in the workplace.
 - If the EIDC concludes that gender-based violence, discrimination or sexual harassment in the workplace did not occur, the case will be archived and the parties involved will be informed.

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- If the EIDC concludes that gender-based violence, discrimination or sexual harassment in the workplace did or still occurs, the EIDC must:
 - Send the report to the People Area for the initiation of the corresponding disciplinary process against the aggressor. The file will also be sent.
 - Activate all the victim protection measures that require implementation, which the EIDC must constantly monitor.
 - Inform victims that they will receive medical care, as well as advice on the legal instances available to them.
- Once the situation of gender-based violence, discrimination or sexual harassment in the workplace that is the subject of the complaint has been eliminated, the case can be archived.

3. Serious misconduct and disciplinary measures.

As GeoPark categorically rejects any gender-based violence, discrimination or sexual harassment in the workplace, in addition to the stipulations of the employment contract, the Internal Work Regulations and other policies, guidelines, commitments, or codes of ethics provided by GeoPark for such purposes, the fact that a worker incurs in behavior that constitutes gender-based violence, discrimination or sexual harassment in the workplace as described in this protocol is classified as serious misconduct. Engaging in such behavior will constitute just cause for the termination of the employment contract.

If during the processing or receipt of a complaint the EIDC evidences the occurrence of any disciplinary offense, it will inform the People Area so that it can initiate the respective disciplinary process, always respecting the confidentiality of the case.

XII. Protective measures

- Immediate care.

After analysis by the EIDC, the feasibility of recommending adjustments in the work location of workers to avoid permanent contact between those involved - such as the change of work schedules, the modification of physical and virtual spaces, lines of management and other factors - will be verified. In Colombia, the feasibility of resorting to work modalities such as teleworking or working at home may be analyzed, provided that the operation allows it.

In accordance with Law 2365 of 2024 applicable in Colombia, alleged victims of sexual harassment and/or discrimination or gender-based violence have the right to: (i) Make a direct approach, if they wish, to the Attorney General or competent authority for the formulation of a criminal complaint, if appropriate; (ii) Inform the Ministry of Labor of the complaint filed when it is against their hierarchical superior, so that this entity, within

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its competences and powers, may follow up, and if there are merits, certify copies to the competent authorities.

- **Psychosocial care.**

Victims of any form of sexual violence have the right to receive health care. Once the situation is known and if required, the corresponding attention will be provided by the areas of the company responsible for workers' well-being, health and safety.

In addition, Colmena Seguros will provide TELECONSULTA services (telephone / virtual), provided by a psychologist, aimed at active listening to provide support and advice for victims of gender-based violence and sexual harassment in the workplace.

This TELECONSULTA service is provided under the methodology of psychological evaluation or assessments, based on the information provided. The purpose of the service is to provide recommendations, good practices to be followed and to declare disabilities if the professional so determines. The contact numbers for Colmena Customer Service are 601 4010447 in Bogota and 01 8000 91 96 97 from other areas of Colombia and from abroad.

Finally, if victims of sexual harassment in the workplace are given medical advice to receive treatment, GeoPark will - if necessary - grant paid leave so that they can proceed with the respective treatment.

- **Advice.**

In-house accompaniment of the victim. This accompaniment will be the responsibility of the Company areas in charge of workers' well-being and safety, if there is a need for guidance and if there is a need to present the respective complaints to the competent authorities. It is within the victim's power to file respective complaints at their discretion.

XIII. **Victim support**

- **Prohibition of retaliation.**

Within its work environments, GeoPark has zero tolerance for any form of punishment, intimidation or retaliation against a person who reports any incident of violence and harassment in the workplace in good faith; files a complaint of workplace violence and

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harassment in good faith; or cooperates in investigations related to a case of workplace violence and harassment.

The purpose of this protocol is to promote a healthy work environment that respects people’s freedoms and dignity, and to inform workers about the resources available to them in the event that they consider themselves victims of gender-based violence, discrimination or sexual harassment in the workplace

The exercise of retaliatory attitudes against victims of harassment by another worker is also classified as a serious disciplinary offense.

- **Data protection.**

The unauthorized disclosure of data from any of the procedures that are initiated will be a serious offense and the corresponding disciplinary measures will be adopted in accordance with applicable internal processes.

- **Confidentiality and reserve.**

The processes carried out in the context of these complaints are confidential and reserved, must comply with due process, and will be in the custody of the EIDC.

XIV. Disclosure and reform.

This protocol will be disseminated to all the Company’s employees and to the community in general through digital means available such as email, the website and the intranet. The protocol may be amended at the request of Senior Management or EIDC members.

XV. Document management table

Date	Reason	Responsible party
July 10, 2024	Document approval	EIDC
October 1, 2024	Publication in DOCS Management	Compliance Leader
October 4, 2024	Outreach at Let’s Learn with GPRK	EIDC
March 5, 2025	Update - XIII Protection Measures, in Psychosocial care and Advice	EIDC