OBJECTIVE

To establish, as an integral part of the Ethics and Compliance Program, the guidelines for the operation of the Ethics Line of GeoPark Limited and its subsidiary companies (collectively, "**GeoPark**" or the "**Company**"), understood as the mechanism for employees, suppliers, customers, shareholders and other stakeholders to report actions contrary to the Code of Ethics and to the policies and procedures that develop it (hereinafter, "Wrongdoing").

This procedure defines the principles that guide the management and investigation of reports, as well as the stages of the process, including receipt, analysis, escalation, investigation, closure and, when applicable, the application of disciplinary measures and remediation actions

SCOPE

This procedure applies to all employees and directors involved in the management of GeoPark's Ethics Line, including those who receive, analyze, investigate, document or close reports of Wrongdoing, those to whom information is escalated, as well as the external and independent operator of the Ethics Line and the third parties engaged to support the management or investigation of cases.

It also guides the actions of all people who, within the framework of report management, are involved in the process, including whistleblowers, reported people and witnesses, when the nature of the case so requires

GENERAL PRINCIPLES

The management of reports received through the Ethics Line and the development of investigations must be guided by the following principles.

<u>Integrity</u>

The management of reports and investigations must be conducted honestly, objectively and impartially, free from real or apparent conflicts of interest. Those involved in the process must act with technical autonomy, base their decisions on the facts and available evidence and avoid undue influence, ensuring fair, reliable and equitable processes.

<u>Confidentiality</u>

Information related to reports, investigations and their results must be handled with strict confidentiality and shared only with those who have a legitimate need to know it for the proper management of the case. Those involved in the management of the Ethics Line must protect the identity of the people involved and safeguard the information, avoiding unnecessary disclosures, without prejudice to applicable legal or regulatory requirements.

<u>Non-Retaliation</u>

GeoPark does not tolerate retaliation or adverse, discriminatory or detrimental treatment against those who, in good faith, submit reports, collaborate in an investigation or participate in the management of cases. The submission of a report or participation in its management does not grant immunity from any responsibilities arising from one's own conduct. Any conduct that may constitute retaliation will be managed as Wrongdoing.

Likewise, when situations that may involve a risk of retaliation, intimidation, harassment or an impact on the working or personal conditions of the whistleblower, witnesses or any person collaborating in the investigation are identified during case management, the appropriateness of adopting preventive or corrective measures aimed at their protection will be evaluated.

Such measures may include, among others, temporary adjustments to duties or reporting lines, modifications to supervision schemes, temporary changes of team or workplace, remote work arrangements, restrictions on contact between the parties involved, or other reasonable and proportionate actions, defined in coordination with the People area and the competent bodies.

The adoption of these measures does not constitute prejudgment regarding the reported facts and shall be preventive and temporary in nature.

<u>Good Faith</u>

Reports made through the Ethics Line must be submitted in good faith, understood as the reasonable belief that the information provided is true and corresponds to Wrongdoing, even if its occurrence is not subsequently confirmed. The Ethics Line must be used responsibly and honestly, and not for the purpose of improperly affecting other people; reports made in bad faith or with deliberately false information will be managed as Wrongdoing.

<u>Due Process</u>

The management, investigation and closure of reports must be carried out respecting due process, ensuring fair, objective and consistent treatment of the people involved. Before disciplinary or sanctioning measures are adopted, it must be ensured that the reported person knows the facts attributed to him or her and has the opportunity to present his or her version and provide the information considered relevant, in terms compatible with the nature of the case and the integrity of the investigation.

<u>Legality</u>

The management of reports and investigations must be carried out in accordance with the law and applicable internal guidelines, respecting the fundamental rights of the people involved. The obtaining and assessment of information and evidentiary elements must always be carried out by legal means, and the information, records and supporting materials generated during the process must be properly managed and preserved, ensuring their integrity, traceability and legitimate use for the purposes of case management.

<u>Proportionality</u>

The management of reports and the development of investigations must be proportionate to the nature of the reported facts, the risks involved and the potential impact on the Company. Actions must be carried out with the necessary diligence and timeliness, within reasonable deadlines, avoiding both unnecessary interventions and unjustified delays, and ensuring that the scope and depth of the investigation are appropriate for the effective and responsible management of each case.

STAGES AND ACTIVITIES FOR REPORT MANAGEMENT

Receipt of Reports

Reports of Wrongdoing may be submitted through the enabled Ethics Line channels, either identified or anonymously, at the discretion of the reporting person. The available channels for submitting reports are as follows:

E-mail: lineaeticageopark@resguarda.com

Web form: RSG | Canal de Reportes (resguarda.com)

Telephone:

- Argentina: 0-800-999-4636 | 0-800-122-7374
- Brazil: 0-800-891-4636
- Colombia: 01-800-752-222
- Ecuador: 1-800-000031
- Spain: 900-975-278
- United States: 1-800-921-2240
- United Kingdom: 0800 285 1993 | 800-041-8214

Without prejudice to the enabled Ethics Line channels, reports of possible Wrongdoing may also be brought directly to the attention of the Compliance area, direct supervisors or the People area. In these cases, those who receive the information must promptly forward it to the Compliance area so that the report is recorded and centralized in the Ethics Line management tool, ensuring its traceability, confidentiality and handling in accordance with this procedure.

The use of any of these channels, as well as the decision to submit the report in an identified or anonymous manner, does not condition the receipt or initial handling of the report, nor does it imply a greater or lesser level of attention, priority or follow-up.

The receipt of Ethics Line reports is performed by an external and independent operator, who acts in accordance with this procedure and the operational guidelines defined by GeoPark. The operator is responsible for receiving the information provided, without making substantive assessments or issuing judgments regarding the truthfulness of the reported facts.

Whenever possible and when a means of contact with the whistleblower is available, the Ethics Line operator shall communicate the case filing number to the person who submitted the report and shall inform them of the possibility of following up on the management of the case through the enabled mechanisms.

1 Employees and other stakeholders must be periodically informed and trained on the channels and procedure for submitting reports through the Ethics Line. In addition, detailed information on how to submit such reports is available at the following link: Ethics Line Instructions.

Once the report is received, the Ethics Line operator must record it completely and promptly in the centralized case management tool provided by GeoPark, ensuring the confidentiality, integrity and traceability of the information from the beginning of the process. Such tool must have the appropriate security measures to guarantee the confidentiality of the information, compliance with applicable personal data protection regulations and the protection of identity.

As a rule, the Ethics Line operator must route reports to the Compliance area so that the preliminary analysis can be carried out and the admissibility, management and possible escalation of the case can be determined in accordance with the subsequent stages of this procedure.

However, when the report involves certain people or critical functions, the Ethics Line operator shall carry out a special initial routing, without first going through the Compliance area. In these cases, the determination of the party responsible for the investigation and the process to be followed shall correspond to the body to which the report is escalated, in accordance with the following rules:
When the report involves members of the executive level (C-Level), the Ethics Line operator must escalate it to the Chair of the Audit Committee and the Chair of the Board of Directors.

- When the report involves any member of the Board of Directors of GeoPark Limited, the Ethics Line operator must escalate it to the Chair of the Board of Directors.
- When the report involves the Chair of the Board of Directors of GeoPark Limited, the Ethics Line operator must escalate it to the Chair of the Audit Committee.
- When the report involves any member of the Compliance team, the Ethics Line operator must escalate it to the Chair of the Ethics Committee.

The receipt and recording of the report do not imply an evaluation of the truthfulness of the facts, nor a prejudgment regarding the persons involved, and has the sole purpose of enabling the proper management of the case in accordance with the subsequent stages of this procedure.

<u>Preliminary Analysis</u>

Once the report has been received by the Compliance area or by the body to which it has been routed in accordance with the receipt rules, a preliminary analysis shall be carried out in order to determine the admissibility and feasibility of initiating a formal investigation, as well as the body responsible for its management.

At this stage, the sufficiency of the information received to understand the reported facts will be evaluated. When the information is incomplete or insufficient, and provided that there is a means of contact or through the Ethics Line operator, the whistleblower may be asked to expand or clarify the information, without this implying prior validation of the facts.

As part of the preliminary analysis, it will also be determined whether, given the nature of the report, it is necessary to activate any crisis management protocol, adopt additional preventive measures to avoid a greater impact on the Company or to protect the information or evidentiary material of the case, or whether it is appropriate at this stage to issue any alert or notification to competent authorities or higher corporate governance bodies of the Company. At this stage, the report will be classified according to its type, in accordance with the following categories:

Category	Description
Information Misuse	Unauthorized disclosure or use of confidential or privileged information, unauthorized destruction or misappropriation of information assets, unauthorized access to technological systems, as well as the purchase or sale of securities based on information not disclosed to the public
Workplace Harassment - Poor Work Environment	Mistreatment, threats, defamation, physical or verbal aggression, harassment, humiliation, persecution, workplace discrimination, obstruction or isolation, inequity in the assignment of duties, favoritism, abuse of power or other forms of lack of workplace protection, as well as any other condition that deteriorates the organizational climate or affects the dignity, well-being or performance of employees.
Sexual Harassment - Gender-Based Violence	Unwanted sexual requests, comments, gestures, insinuations or touching, dissemination of pornographic material without consent, demands for sexual favors in exchange for employment benefits, as well as discrimination and humiliation based on gender or sexuality.
Adverse Impact on Human Rights	Any action, omission or practice that undermines, restricts or denies human rights, whether directly or indirectly. This includes, among others, forced labor, discrimination, child labor, kidnapping, violation of the right of association, freedom of association, and any other form of violation of human dignity.
Public Corruption	Bribery of national or foreign public officials, as well as the offering or promise of payments, favors or items of value to them to obtain undue benefits, influence peddling, nepotism, irregular financing of political campaigns, violation of the disqualification regime, collusion in public procurement processes or other offenses against public administration.
Forgery	Forgery, alteration or improper modification of documents, indicators, records or reports, or impersonation of persons or entities.
Terrorist Financing	Financial support or performance of activities that, in any way, support illegal armed groups, terrorism or other people who promote, plan or are involved in it.
Mismanagement of Conflicts of Interest	Failure to disclose conflicts of interest, incomplete, untimely or inaccurate disclosure, inadequate management of such conflicts or failure to comply with the associated mitigation measures.
Personal Data Incidents	Any event, act or situation involving unauthorized access, disclosure, modification, loss, theft or misuse of personal data.
Procurement Irregularities	Irregularities or omission of controls in procurement, purchasing, supply or commercial processes, as well as any ethical breach in the processes of selection, contracting, payment or receipt of goods and services.
Money Laundering	Commercial or financial transactions or operations to conceal, hide or give an appearance of legality to funds of illicit origin or derived from criminal activities such as drug trafficking, corruption or other predicate offenses.
Misappropriation of Assets	Improper use, misappropriation, theft or unauthorized appropriation of the Company's assets, resources, equipment, work tools or facilities.

Category	Description
Complaints against Suppliers	Complaints, claims or reports against the Company's suppliers or contractors that are not related to GeoPark employees or internal processes and do not involve GeoPark's participation in the reported conduct.
Receipt or Request for Improper Benefits	Incorrect management of any type of benefit in the private sphere, including the receipt or request of gifts, courtesies, hospitality, commissions, personal or family benefits, employment offers, contracts, advantages, favors or items of value that are not authorized, compromise the objectivity and independence of the recipient or are prohibited by internal policies or associated regulations.
Socio-environmental Reports	Requests or complaints related to the Company's non-compliance with commitments to the community, as well as concerns regarding the operation, property impacts, environmental impacts, non-compliance with legal obligations or other aspects that affect the environment.
Retaliation	Actions that worsen conditions or entail negative consequences for a person who has reported Wrongdoing in good faith.
Other Reports	Reports, complaints or requests that do not fit any of the other predefined categories available.

Based on the classification of the report according to its type and on the evaluation carried out during the preliminary analysis, the applicable management and escalation route will be determined, identifying the area, committee or body responsible for the investigation, as well as the body to which the investigation plan and the conclusions of the case must be escalated, in accordance with the escalation matrix defined below:

Category	Responsible	Escalation
Information Misuse	Compliance	Corporate Governance and Compliance Manager
Workplace Harassment - Poor Work Environment	Coexistence Committee When the reported party is a GeoPark employee or an office contractor, regardless of location	According to the procedures of the Coexistence Committee
	People When the reported party belongs to the Argentina operation	According to People procedures
	Cuéntame When the reported party is a contractor of the Colombia operation	According to Cuéntame procedures
	People For cases that do not involve workplace harassment conduct	According to People procedures
Sexual Harassment - Gender-Based Violence	Equity, Inclusion and Diversity Committee	According to the procedures of the Equity, Inclusion and Diversity Committee

Category	Responsible	Escalation
Adverse Impact on Human Rights	Sustainability* In addition, if any report from another category indicates a potential adverse impact on human rights, the Sustainability team must be informed. Sustainability* In addition, if any report from another category indicates a potential adverse impact on human rights, the Sustainability team must be informed.	According to Human Rights procedures
Public Corruption	Compliance	Ethics Committee and Audit Committee (according to their regulations)
Forgery	Compliance	Corporate Governance and Compliance Manager
Terrorist Financing	Compliance	Ethics Committee and Audit Committee (according to their regulations)
Mismanagement of Conflicts of Interest	Compliance	Corporate Governance and Compliance Manager
Personal Data Incidents	Legal	According to Personal Data procedures
Procurement Irregularities	Compliance	Corporate Governance and Compliance Manager
Money Laundering	Compliance	Ethics Committee and Audit Committee (according to their regulations)
Misappropriation of Assets	Compliance	Corporate Governance and Compliance Manager
Complaints against Suppliers	Cuéntame (field suppliers)	According to Cuéntame procedures
	Procurement (other suppliers)	According to Procurement procedures
Receipt or Request for Improper Benefits	Compliance	Corporate Governance and Compliance Manager
Socio-environmental Reports	Cuéntame	According to Cuéntame procedures
Retaliation	Compliance	Corporate Governance and Compliance Manager
Other Reports	Process Leaders	Process Leaders

For cases whose investigation does not correspond to the Compliance area but must be carried out by another area or committee, the following guidelines shall apply:

- The development and documentation of the investigation and the escalation shall be governed by the procedures of the responsible area or committee, when applicable, or by the activities defined by the person responsible for the investigation, in line with the principles established in this procedure.

- The report shall be closed in the Ethics Line platform once it has been transferred to the corresponding system and the receiving area or committee confirms its authority to conduct the investigation, according to the type of report.

As a result of the preliminary analysis, a decision duly documented in the Ethics Line platform shall be adopted, consisting of:

- Initiation of a formal investigation of the report and creation of a case in the platform.
- Closure of the report when there is no merit to conduct a formal investigation.

Closure shall proceed, among other circumstances, when there is insufficient information to identify minimum circumstances of time, manner and place; when it is not possible to obtain additional information that would allow progress; when the facts are materially or factually impossible to investigate; or when it is reasonably concluded that they are not related to the Company, its employees, suppliers or operations.

The closure decision does not constitute a statement regarding the responsibility of the people mentioned or a prejudgment regarding the reported facts and responds exclusively to the impossibility of investigating in accordance with the criteria established in this procedure. A closed report may only be reopened exceptionally when new, relevant and verifiable information is received that makes it possible to overcome the causes that led to its closure, leaving a record thereof in the Ethics Line platform.

<u>Definition of the Investigation Plan</u>

For those reports for which it has been decided to initiate a formal investigation, an investigation plan must be defined. Its purpose is to clearly establish the minimum activities necessary to verify whether the reported facts occurred, identify their causes and determine the disciplinary, corrective, remediation and process improvement actions that may be appropriate, to prevent the recurrence of similar conduct.

The investigation plan must define the objective and scope of the investigation, considering the facts to be verified, the impacted process or processes, the associated risks and the elements necessary to analyze the reasonableness of the report, as well as its possible consequences for the Company. Likewise, the investigation team and the support areas or collaborators that must intervene must be identified according to the nature of the case, its technical complexity, the potential impact, the risks involved or the need for specialized capabilities.

In defining the investigation plan, the need to involve certain internal areas or bodies must be evaluated, at a minimum, according to the nature of the report and the risks identified. In particular, the participation of the Legal area must be considered when the case may involve legal, regulatory or contractual impacts; the Investor Relations and Corporate Governance area when the report involves or may affect shareholders; the area responsible for insurance management when the facts may give rise to claims before insurers; the Sustainability area when there is a possible adverse impact on human rights; the People and Asset Protection area when risks to physical security are identified; and the Compliance Officer when alerts related to money laundering, terrorist financing or corruption arise, without prejudice to any other areas that may be relevant according to the characteristics of the case.

When justified by the complexity of the case, its scope, associated risks or the need for additional support, the engagement of expert third parties or specialized external firms may be determined, such as forensic auditors, due diligence specialists, legal advisors or technological resources. In these cases, the need for legal support should also be evaluated, including the possible involvement of external advisors under professional secrecy, when the nature of the report requires so.

The investigation plan must include the activities necessary to collect, integrate and analyze the relevant information, which may include, among others, interviews with whistleblowers, witnesses and persons involved; monitoring of transactions, accounting movements, contracting or use of resources; review of institutional communications and digital tools; analysis of corporate and operational documents; verification of employment or disciplinary history; consultation of external databases or restrictive lists; enhanced due diligence, validation of performance history and detection of any recurrence; as well as the evaluation of organizational culture and work climate aspects, when relevant

Development of the Investigation

The execution of the investigation plan must be carried out in accordance with what is defined therein, ensuring objective and diligent action aligned with the General Principles of this procedure. The investigation must ensure the rigorous documentation of all activities, findings and decisions adopted, leaving a verifiable record of each step, as well as the proper custody of the evidence collected, protecting its integrity and ensuring the traceability of the case.

The obtaining of evidence or evidentiary material must be carried out exclusively through legal means, always respecting the privacy, intimacy and fundamental rights of the people involved. The investigation must be conducted on the assumption that cases may lead to disciplinary, administrative or judicial proceedings; therefore, the collection, handling and analysis of evidence must comply with criteria of legality, proportionality and legitimacy, ensuring its validity and appropriate use.

Likewise, the need to make reports or notifications to external authorities must be continuously evaluated when signs of possible administrative violations or crimes are identified, in accordance with applicable regulations.

When, because of the development of the investigation, there are reasonable indications of the possible occurrence of the reported facts, and before the investigation report is prepared and closed, the reported person must be given the opportunity to know the facts attributed to him or her and to present his or her version.

For these purposes, interviews may be conducted with the reported person, in which he or she will be allowed to provide information, documents or elements of judgment considered relevant to his or her defense, on terms compatible with the nature of the case and the integrity of the investigation.

Preparation of the Investigation Report

The investigation must conclude with the preparation of a final report containing the details of the activities carried out, a summary of the findings and the conclusions of the investigation, supported by the information and evidence collected. The report shall serve as the basis for adopting the corresponding disciplinary, corrective and remediation decisions.

When relevant, the investigation report must include a root cause analysis of the facts identified, aimed at understanding the factors that allowed the investigated conduct to occur. Such analysis may consider, among other aspects, control weaknesses, process failures, deficiencies in supervision, inadequate incentives, cultural or training aspects, insufficient segregation of duties or other relevant causes that explain the materialization of the event.

Based on this analysis, the report must propose corrective, remediation and improvement measures, distinguishing those aimed at correcting individual conduct from those aimed at strengthening processes, controls or organizational practices, to prevent the recurrence of similar events. Remediation proposals may include, among others, process adjustments or redesigns, strengthening of internal controls, changes in approval or supervision schemes, training and awareness programs, targeted audits, independent reviews, specific follow-up actions or improvements in technological and monitoring tools.

Likewise, when applicable, the report may include a recommendation to apply disciplinary or sanctioning measures, which must be proportionate to the seriousness of the facts, consider recurrence of conduct and the impact on the Company, and comply with labor and contractual regulations and with the internal procedures in force. Such recommendations may include, among others, formal warnings, suspensions, termination of the employment or contractual relationship, or referral of the case to the competent authorities.

The investigation report may also identify the need for additional preventive actions, such as reviews of internal policies, reinforcement of training, improvements in the communication of ethical standards or adjustments to the Ethics and Compliance Program, as inputs for the continuous improvement of the program.

Case Closure

Based on the investigation report, the case will be formally closed in the centralized Ethics Line platform, recording the conclusions of the investigation and the outcome of the case, according to the degree of confirmation of the facts analyzed. The outcome of the case may be classified, as applicable, as evidenced, partially evidenced or not evidenced, in accordance with what is documented in the report.

The closure of the case does not prevent its exceptional reopening when new, relevant and verifiable information is subsequently received that justifies reviewing the conclusions adopted.
Once the case is closed, the conclusions of the investigation report shall be notified to the corresponding areas, process leaders or internal bodies, exclusively for the purposes that may be appropriate, such as the evaluation and implementation of corrective, remediation or process improvement actions, or the adoption of other preventive measures aimed at avoiding the occurrence of similar events.

Without prejudice to the formal closure of the case, the Compliance area shall follow up on the implementation of the corrective, remediation or improvement actions derived from the investigation report, in order to verify their execution and effectiveness, leaving a record of such follow-up and implementation in the Ethics Line platform.

When the application of disciplinary or sanctioning measures is recommended, such conclusions shall be brought to the attention of the People area so that it may evaluate and, when appropriate, carry out the respective actions in accordance with labor and contractual regulations and the internal procedures in force, with the support of the areas that may be necessary.

Likewise, and within the limits permitted by confidentiality, personal data protection and applicable regulations, the whistleblower may be informed that the report was investigated and that the investigation has concluded, without revealing confidential information.

The closure of the case, the notifications made and the actions derived from the conclusions of the report must be duly documented in the Ethics Line platform, ensuring the traceability of the case even after its closure.

Maximum Management Period

In order to ensure the timely, orderly and efficient management of reports received through the Ethics Line, the maximum period for handling and closing cases shall be ninety (90) calendar days counted from their formal registration in the management platform
.
This period constitutes the desirable management standard for ordinary cases. However, when the complexity of the matter, the need to gather additional evidence, the participation of multiple areas or jurisdictions, the involvement of expert third parties, or any other duly justified circumstance so requires, the period may be extended for the strictly necessary time.

Any extension must be duly documented in the Ethics Line management platform, leaving a record of the reasons that justify it.

In any case, cases must be managed with the greatest possible diligence, avoiding unjustified delays.

INQUIRIES AND REPORTS

In the event of any doubt regarding the operation of the Ethics Line, the interpretation or application of this procedure, or when situations arise that are not expressly regulated, the Compliance area must be contacted for guidance and clarification (compliance@geo-park.com).

If any act contrary to the provisions of this procedure is known, it must be reported to the Compliance area or through the Ethics Line: e-mail lineaeticageopark@resguarda.com, the web form available at RSG | Canal de Reportes (resguarda.com) or the telephone contacts available in each jurisdiction.

CONSEQUENCES OF NON-COMPLIANCE

Non-compliance with this procedure may result in disciplinary measures ranging from warnings to termination of the employment or contractual relationship, depending on the seriousness of the situation and always respecting due process.

In particular, non-compliance with this procedure may include, among others, the deliberate delivery of false information, unjustified failure to cooperate in an investigation, obstruction of the process, failure to comply with confidentiality obligations, abuse of the use of the Ethics Line, as well as any act of retaliation against persons who have submitted reports in good faith or participated in the management of cases.

PERIODIC UPDATE

This procedure may be updated based on new risks in GeoPark's operations and businesses, as well as on recommendations from employees and directors. Changes in applicable regulations and the identification of standards and good practices that contribute to the prevention of misconduct will also be considered. In any case, at least every two years the need to update this procedure will be assessed in order to maintain its effectiveness.

VERSION CONTROL

Version	Date	Description
01	13/03/2026	Creation of the Ethics Line Management Procedure, which replaces the document entitled 01-01-101 Ethics Line Commitment approved on June 18, 2021, and 01-01-101F01 - Annex 1: Ethics Line Protocol - Report Parameterization and Escalation, approved on March 20, 2025, unifying them into a single procedure.