

Document	01 Policy	Name	Anti-Corruption		
System	00 SPEED	Sub-System	01 Compliance	Country 01. Corporativo	
Code	01-01-102				
Issue Date 03/08/2026	Prepared By Compliance Officer		Approved By Audit Committee (Board)	N° Version 01	Page 1

OBJECTIVE

To establish, as an integral part of the Ethics and Compliance Program, the principles, guidelines and prohibitions to prevent, detect and manage the risks of Bribery and Corruption in all operations, decisions and relationships of GeoPark Limited and its subsidiaries (collectively, "**GeoPark**" or the "**Company**").

SCOPE

This Policy applies to all employees, trainees, interns, temporary employees and members of the Board of Directors of GeoPark, regardless of their duties, level within the organization or the jurisdiction in which they are located. Its scope also extends to contractors and suppliers acting on behalf of GeoPark, as well as to any other third party being it, including agents and third-party intermediaries.

DEFINITIONS:

For the proper interpretation of this Policy, the following terms shall have the meanings shown below:

- **Corruption:** any conduct through which a public or private position, role or power is abused to obtain an undue benefit, direct or indirect, for oneself or for third parties, including practices such as bribery, influence peddling, collusion, diversion of resources or manipulation of processes.
- **Bribery:** the offer, promise, authorization or delivery of payments, goods, items of value or benefits for the purpose of influencing official decisions, securing business or obtaining advantages from Authorities or Government Officials or other third parties that administer public resources. This concept includes transnational bribery.
- **Facilitation Payment:** any payment, benefit or item of value offered or delivered for the purpose of expediting, securing or improperly influencing the performance of a routine or administrative act to which the Company would be entitled, and which is not expressly allowed by applicable law.
- **Authorities:** State entities, bodies or agencies, whether national or foreign, including national, regional or local governments, ministries, regulatory agencies, administrative or judicial authorities, state-owned or state-participated companies and public international organizations.
- **Government Officials:** natural people who perform or represent public positions, functions or employment, whether permanent or temporary, in State entities, bodies or agencies, whether national or foreign, including state-owned companies, authorities, regulators and public international organizations.
- **Politically Exposed Persons (PEPs):** individuals who hold or have held in the last years relevant public positions or high- level functions in public administration, political parties or international organizations, involving the issuance of regulations, the formulation of public policies, the management of State resources or the administration of justice, including, among others, heads of State, ministers, parliamentarians, members of courts and representatives of international organizations.

Document	01 Policy	Name	Anti-Corruption		
System	00 SPEED	Sub-System	01 Compliance	Country 01. Corporativo	
Code	01-01-102				
Issue Date 03/08/2026	Prepared By Compliance Officer		Approved By Audit Committee (Board)	N° Version 01	Page 2

- Close Associates of PEPs: business partners, close friends or trusted advisors of a Politically Exposed Person.
- Relatives of PEPs: relatives up to the second degree of consanguinity, the first degree of affinity or the first degree of civil relationship (children, parents, grandparents, siblings, grandchildren, parents-in-law, sons-/daughters-in-law, spouse or partner) of a Politically Exposed Person.

GUIDELINES FOR THE PREVENTION OF BRIBERY AND CORRUPTION

The following guidelines set up the standards that all recipients of this Policy must observe for the prevention of Bribery and Corruption risks:

Prohibition of Bribery

It is strictly prohibited to offer, promise, authorize, deliver or accept, directly or indirectly and by any means, including through intermediaries, agents, consultants, representatives, suppliers or other third parties, any favor, payment, gift, benefit or item of value to Authorities, Government Officials, Politically Exposed Persons (PEPs), their Close Associates or Relatives, for the purpose of improperly influencing their decisions, actions, omissions or functions, or obtaining undue advantages for GeoPark.

Facilitation Payments are also prohibited, except in exceptional cases in which they are expressly allowed by applicable legislation and have the prior approval of the Legal and Compliance areas, by the Company's internal guidelines.

Likewise, illegal commissions or kickback payments are prohibited, understood as the delivery or offer of money, benefits or other items of value as compensation for receiving favorable treatment, securing a contract, an award or any undue advantage, whether directly or indirectly, including hidden discounts or rebates associated with contracts or transactions.

Relations with Authorities and Government Officials

Interactions with Authorities and Government Officials on behalf of GeoPark must be conducted respectfully, in transparent and by the law, avoiding any conduct that could be interpreted as an attempt to obtain undue advantages.

Such interactions must be conducted only by people authorized by the Company, must always have a legitimate business purpose and must be reported in the Government Officials Interaction Register.

If GeoPark engages agents, third parties, consultants, intermediaries or other people to interact on its behalf with Authorities or Government Officials, guidance must be obtained from the Compliance area about the applicable minimum mitigation measures.

Decisions by Authorities that are adverse to the Company's interests must be challenged only through the applicable legal mechanisms, in a transparent and documented manner, without exerting undue pressure or resorting, directly or indirectly, to personal efforts, intermediation, offers, promises or any other conduct that could be interpreted as influence peddling, Bribery or Corruption.

Document	01 Policy	Name	Anti-Corruption		
System	00 SPEED	Sub-System	01 Compliance	Country 01. Corporativo	
Code	01-01-102				
Issue Date 03/08/2026	Prepared By Compliance Officer		Approved By Audit Committee (Board)	N° Version 01	Page 3

Before entering into contracts, agreements or arrangements, as well as before employing or engaging as a supplier, advisor, consultant or similar any Authorities, Government Officials, Politically Exposed Persons (PEPs), their Close Associates or Relatives, the prior evaluation and approval of the Legal and Compliance areas must be obtained, in order to verify legality under the applicable disqualification and incompatibility regime and to define the corresponding risk mitigation measures.

Gifts and Hospitality

Hospitality, courtesies or gifts, whether granted or received, may only be provided when they have a legitimate purpose, such as strengthening institutional or commercial relationships, provided that they are reasonable in value and frequency, comply with applicable legislation and customary business practices, and cannot under any circumstances be interpreted as an attempt at Bribery, as an attempt to improperly influence the objectivity or independence of the recipient, or as a reward or remuneration, direct or indirect, for a decision previously adopted.

In the case of gifts intended for Government Officials, they may be given only exceptionally, must have a maximum value equivalent to USD 50 and should preferably correspond to branded souvenirs or corporate material. Under no circumstances may these gifts consist of money or cash equivalents, such as vouchers, gift cards or related items.

When GeoPark covers travel, lodging, transportation or meal expenses for Government Officials, such expenses must be strictly limited to what is necessary for the execution of the activity or visit, must not result in direct reimbursements, must not include personal or luxury expenses and must not be extended to relatives, friends or other close people.

Gifts, hospitality or other transfers of value to Government Officials must be reported in the Government [Record of Interactions with Government Officials](#).

With respect to gifts granted or received in relationships with third parties other than Government Officials, in addition to the considerations mentioned above, the maximum permitted value shall be USD 100, and they must be reported in [Register of Gifts and Attentions](#).

Any gift or hospitality that exceeds the established limits does not follow the requirements of this Policy or raises reasonable doubts about its appropriateness because it could affect the impartiality or independence of decisions must be rejected or returned. If this is not possible, guidance must be requested from the Compliance area to decide its proper handling.

Donations, Sponsorships and Contributions

Donations, sponsorships, social or environmental investment activities, and any other contributions made by GeoPark to charities, foundations, associations, non-governmental organizations or other non-profit entities must always have a legitimate, lawful and verifiable purpose, and must be aligned with the Company's social and environmental investment strategies, as well as its engagement with communities, neighbors and other stakeholders.

Under no circumstances may these activities be used, directly or indirectly, to facilitate, conceal or promote acts of Bribery or Corruption, nor may they be granted with the purpose of improperly influencing decisions made by Authorities, Government Officials or third parties, or obtaining undue benefits.

Document	01 Policy	Name	Anti-Corruption		
System	00 SPEED	Sub-System	01 Compliance	Country 01. Corporativo	
Code	01-01-102				
Issue Date 03/08/2026	Prepared By Compliance Officer		Approved By Audit Committee (Board)	N° Version 01	Page 4

When the beneficiary of the contribution is an Authority, GeoPark must adopt enhanced measures to manage Corruption risk, ensuring that contributions are not delivered directly to Government Officials or to intermediaries that are not formally linked to the Authority, and that under no circumstances are they intended to influence decisions, actions or processes under the responsibility of such Authority.

All donations, sponsorships and contributions must be properly documented and formalized through agreements, minutes or other equivalent instruments. GeoPark must verify that the recipients are legally incorporated entities engaged in legitimate activities and must comply with the [Compliance Due Diligence Procedure](#).

Contributions to Democracy

The Company shall not make, directly or indirectly, contributions or donations of any kind to candidates, political parties, campaigns, referendums or political initiatives, including contributions in money, goods, services or corporate resources.

Adequate Accounting Records

Any donation, contribution to democracy, gift, hospitality, sponsorship, contract, agreement with Authorities or Government Officials, or any other payment or transfer of value made by GeoPark must be recorded clearly, truthfully and in a timely manner in the Company's books and accounting systems, reflecting its nature, purpose, amount and recipient. It is prohibited to conceal, alter or omit accounting records to cover up improper activities. GeoPark should keep adequate internal controls to ensure the transparency and traceability of these operations.

Under no circumstances shall the use of personal resources by the recipients of this Policy, the use of third parties or intermediaries, or the splitting of operations, payments or contributions be permitted for the purpose of circumventing or evading the prohibitions, controls, limits, approval requirements or restrictions established in this Policy or in GeoPark's other Ethics and Compliance guidelines. Likewise, the payment of bribes through commissions, fees or other payments to employees, contractors or third parties, as well as through commercial discounts, incentives or instruments of a similar nature, is prohibited.

The amount of a payment, gift or contribution does not exempt compliance with this Policy; therefore, there are no exceptions for minimum values when the conduct is prohibited in this document.

INQUIRIES AND REPORTS

In case of any doubt about the interpretation or application of this Policy, or when situations arise that are not expressly regulated, it is important to contact the Compliance team for guidance and clarification (compliance@geo-park.com).

If any act contrary to the provisions of this Policy or to the other guidelines adopted by GeoPark for the prevention of Bribery or Corruption risks is known, it must be reported to the Compliance area or through the Ethics Line: e-mail lineaeticageopark@resguarda.com, the web form available

Document	01 Policy	Name	Anti-Corruption		
System	00 SPEED	Sub-System	01 Compliance	Country	01. Corporativo
Code	01-01-102				
Issue Date 03/08/2026	Prepared By Compliance Officer	Approved By Audit Committee (Board)	N° Version 01	Page 5	

at [RSG | Canal de Reportes \(resguarda.com\)](https://resguarda.com) or the telephone contacts available in each jurisdiction¹.

CONSEQUENCES OF NON-COMPLIANCE

Non-compliance with this Policy 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 addition, it could result in legal action against GeoPark or the recipients of this Policy under the applicable regulations.

PERIODIC UPDATE

This Policy 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 Policy will be assessed to maintain its effectiveness.

CONTROL DE VERSIONES

Version	Date	Description
01	03/08/2026	Creation of the Anti-Corruption Policy approved by the Audit Committee of the Board of Directors as a standalone document, which replaces and renders ineffective the Anti-Bribery and Anti- Corruption Commitment approved on March 9, 2021; the Commitment of the Compliance Program against Bribery and Corrupt Practices approved on March 9, 2021; the Commitment for Engagement with Public Officials approved on April 19, 2016; and the Commitment on Gifts, Sponsorships, Donations and Contributions approved on March 9, 2021, all of which are expressly repealed and replaced by this Policy.

¹ Reports may also be submitted to the authorities of each jurisdiction; in Colombia, the complaints channel made available by the Superintendence of Companies is available and may be accessed [here](#), as well as the channel established by the Transparency Secretariat, available [here](#).