

Documento	01 Compromiso	Nombre	Anti-Bribery & Corruption		
Sistema	01 Governance	Sub-Sistema	01 Compliance	País 01. Corporativo	
Código	01-01-102				
Fecha Emisión	09/03/2021	Preparado por	Compliance & Internal Control	Aprobado por	Audit Committee
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I. PURPOSE

This Anti-Bribery policy (the "Policy") is intended to ensure compliance by the Company with the anti-bribery and anti-corruption laws in force at a national and international level. The terms "anti-bribery" or "anti-corruption" are used as similar terms.

II. SCOPE

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

III. DEFINITIONS

Agent: Third party attorney, consultant, adviser, member of a joint venture, supplier, or representative who acts on behalf of the Company when dealing with public or state-owned governmental agencies, including government-owned or controlled enterprises, customs, migration and tax authorities, and other government officials.

Director of Legal & Governance Department: Person responsible for the development, implementation and application of the Policy, and for supporting the activities carried out by the Compliance Manager.

Employee: Any employee or senior officer of the Company.

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

Compliance Manager: Employee responsible for coordinating and supervising the anti-bribery policies within the Company.

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

Compliance Program: Company's program designed to detect and prevent breach of anti-bribery laws, described in detail in "01-01-103 Compliance Program against Bribery and Corrupt Practices".

IV. GENERAL CONSIDERATIONS

A. PAYMENT PROHIBITIONS

I. Payments to Government Officials

All employees and agents shall comply with all applicable anti-bribery laws.

Employees or agents shall not pay, offer, authorize or promise to pay, whether directly or indirectly, an object or anything of value to any governmental official or political party, with the intention to exercise influence on or induce said person or entity to act in a way contributing or assisting the Company to:

Obtain or retain a commercial operation or business activity; or
 Conduct business with another person and/or entity; or
 Obtain an improper advantage.

Likewise, employees or agents shall not pay, offer, authorize or promise to pay, whether directly or indirectly, an object or anything of value to another person, if there are reasons to believe or suspect that the payment or payment promise will be offered or given to a government official or political party, according to the characteristics described above.

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II. Political Contributions

No funds, premises or services shall be paid or given to candidates to a political position, or to a political party, officer or employee of these organizations, or for an initiative, referendum or political campaign.

B. CHARITABLE AND OTHER CONTRIBUTIONS

The guidelines of this section are described in the policy **01-01-104 Gifts, Sponsorships, Donations and Contributions**.

C. AGENTS

Agents may provide representation, association or other services for the Company only after the agents and the services have been checked, approved and registered by the Company.

- a. Due Diligence. The Legal and Governance Department will be responsible for the regular due diligence process of Agents in order to detect any irregularity. Once it is completed, the whole process will be documented according to document "01-01-103 Compliance Program against Bribery and Corrupt Practices".
- b. New Agents. In order to employ a new Agent, any supplier shall fill out the form "03-03-101 F001 Suppliers Registration", and declare whether he is classified as a Company's Agent. If he is classified as such, the Compliance Manager will be informed and ask supplier (prospective Agent) to fill out the form "01-01-102 F001 Certified Agent", in order to validate the supplier before he is finally approved for admission. Once the revision and validation process has been completed, the Director of the Legal and Governance Department (or the person that the latter may appoint) will approve or reject supplier employment.
- c. Payments. The Company shall not pay receipts issued by an Agent, unless:
 - i. The Company has received the receipt from an Agent duly registered (through the due diligence process or supplier registration, as described above) specifying the services;
 - ii. The receipt has been approved by the manager of the department incurring the expenses, and the latter has consulted the Legal & Governance Department about the Agent's validity.

D. EDUCATION

The Ethics Committee, under the direction of the Director of the Legal & Governance Department, is responsible for implementing an Employee Education Plan. The Plan will be designed to train employees on this policy and the anti-bribery laws, among others, and to raise the employees' consciousness and understanding of the Program. For further details, refer to "01-01-103 Compliance Program against Bribery and Corrupt Practices".

E. REPORTING

Any employee who has access to information that indicates or suggests that an employee or Agent has breached this Policy or any of the anti-bribery laws, shall immediately report this fact to its Supervisor, the Director of the Legal & Governance Department or the Ethics Line. Under no circumstances shall the reporting of such information made in good faith be taken as a basis to take reprisals against the employee who has issued the report.

F. ACCURACY OF BOOKS AND RECORDS

Employees shall ensure that the books and records kept by the Company reflect all the operations carried out by the Company accurately, impartially and in sufficient details. Accounts and other records of transactions shall be complete and accurate.

G. MONITORING AND CONTROL

The provisions of this Policy will be subjected to regular controls. These controls will evaluate the effectiveness of this Policy and will be taken as a basis for the implementation of improvements, if necessary.

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I. RESPONSIBILITY

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

REFERENCES

- 01-01-102-F001 Certified Agent
- 01-01-103 Compliance Program against Bribery and Corrupt Practices

