

## GRAN TIERRA ENERGY CORPORATE HUMAN RIGHTS POLICY

### OBJECTIVE AND SCOPE

This document reflects the commitment of Gran Tierra Energy Inc. (“Gran Tierra” or “the Company”) to the respect and promotion of all Human Rights internationally recognized. The provisions set out herein apply to all Company activities and cover all its employees and to the Company's contractors.

### OUR ROLE IN SOCIETY

Respect for Human Rights is a fundamental pillar of the vision of Gran Tierra Energy Inc. The recognition of human dignity, as well as respect for rights, both individual and collective, are principles to which we are committed in every area of our business activity. Although the primary responsibility to protect Human Rights lies with the State, the Company, as a member of society, promotes and respects fundamental rights in all our actions and through joint actions with other parties including, national and international institutions.

### OUR ROAD MAP

The Gran Tierra Energy Human Rights Policy was developed with the full commitment to respect the internationally recognized human rights incorporated in the International Bill of Human Rights and the International Labor Organization Conventions (“ILO”), including the fundamental rights principles established in the ILO Declaration on fundamental principles and rights at work. Also, with the commitment to apply relevant international standards including: i) the United Nations (“UN”) Guiding Principles on Business and Human Rights the United Nations (“UN”), ii) the UN Voluntary Principles for Security and Human Rights, iii), the OECD guidelines for multinational companies, iv) the due diligence guide for responsible business conduct of the OECD, v) the UN 2030 Agenda for Sustainable Development and Gran Tierra’s Code of Business Conduct & Ethics.

### OUR COMMITMENTS

Gran Tierra Energy is committed to respect the rights of employees, contractors, suppliers, and communities within its area of influence in the development of all of its operations and activities.

In this sense, it is also committed to prevent and/or mitigate negative consequences on human rights that are caused, contributed to or directly linked to its operations, and to implement effective and appropriate remedies should any adverse event occur that affects fundamental rights as a result of Company activities.

Gran Tierra will comply with the laws and regulations applicable to the territory where it performs its activities, and, if legal, administrative or regulatory mechanisms are weak or do not exist, the Company will act in accordance with this Human Rights corporate policy; it shall always comply in full with the due diligence standards enshrined in the Voluntary Principles on Security and Human Rights and the Guiding Principles on Business and Human Rights of the United Nations.

#### **To local communities:**

- Contribute to the socioeconomic development of the communities where it operates.
- Be open to dialogue with local communities to understand their Human Rights concerns and address incidents related to the real and potential impacts of its operations.
- Establish grievance and claim mechanisms that are transparent, culturally appropriate and accessible that allow for the establishment of an immediate communication channel with the communities, and facilitate an effective response to any potential incident related to Human Rights.
- Maintain an open and respectful dialogue with social leaders, human rights defenders, and environmental activists and assume an active role to inform the competent authorities of the threat situations known to the company, in which there is a potential impact on the life and / or integrity of the people of the regions where Gran Tierra operates.
- Promote respect for gender equity, as well as ethnic and cultural diversity in labor relations and with the community.
- Monitor the company's performance with respect to Human Rights.
- Manage impacts and promote environmental awareness and sustainable strategies for the protection of the environment and, in particular, water sources.

**To employees, contractors and suppliers:**

- All employees, contractors and suppliers have the obligation of knowing and respecting this policy.
- Establish grievance and claim mechanisms that are transparent and accessible, that allow for the establishment of an immediate communication channel with workers and contractors, and facilitate effective response to any real and/or potential incident related to Human Rights.
- Provide the knowledge and tools necessary to address issues related to Human Rights, with a primary focus on the prevention of child labor, respect for the rights of communities, and the prevention of all types of discrimination.
- Implement policies and practices with private security contractors that enable the training of their employees with respect to human rights, so that their behaviors and actions are aligned with the Universal Declaration of Human Rights and the Voluntary Principles on Security and Human Rights, and other international standards related to the measured use of force.
- Train employees in the prevention of human rights violations inside and outside the company. Contractors will be required to train their employees to prevent such practices.
- Guarantee safe conditions in the jobs created within the course of all business activities. Contractors will be required to guarantee the same conditions for their employees.
- Eradicate all forms of child labor in business activities, as well as require contractors and suppliers to have zero tolerance of this type of practice in their companies.
- Secure adequate mechanisms so that the workers or contractors of Gran Tierra can denounce, with full confidence, the alleged violations of their right to work at the company or with contractors.
- Implement policies that promote respect for gender equity and ethnic diversity.
- Promote human rights due diligence in the Company's supply chain.

**To State institutions:**

- Maintain an open dialogue with the local, regional and national government regarding security and Human Rights issues related to the operation.
- Keep track of Human Rights investigations related to Company operations, and report to the authorities as soon as it becomes aware of any incident.

**Gary S. Guidry  
President and CEO  
December 10, 2019**