

HUMAN RIGHTS POLICY

The Human Rights Policy of Gran Tierra Energy Inc. (Hereinafter "Gran Tierra" or the "Company") has been written in accordance with the principles enshrined in the United Nations Universal Declaration of Human Rights, the Voluntary Principles on Security and Human Rights and the Conventions of the International Labour Organization (hereinafter "ILO").

Gran Tierra conducts its operations with integrity, respecting human dignity and the rights of individuals. Although the primary responsibility for the protection of Human Rights lies with governments, the Company promotes and respects these rights through joint actions between society, business and institutions.

Gran Tierra's goal is to avoid direct or indirect involvement in human rights abuses, and to provide access to appropriate remedies that address human rights abuses which may arise from the company's activities.

Gran Tierra will comply with all applicable laws and regulations. Where the legal, regulatory or administrative mechanisms are weak or do not exist we will behave in a manner that reflects our commitment to the implementation of the Voluntary Principles on Security and Human Rights and is consistent with the Guiding Principles of the United Nations on Business and Human Rights. The Company operates in accordance with the standards of due diligence contemplated in these instruments.

To ensure we do not contribute to or tolerate human rights abuses Gran Tierra will

- Engage with local communities to understand their human rights concerns and to address incidents, through dialogue and remedy, as appropriate.
- Establish a culturally appropriate, accessible, responsive and transparent grievance mechanism that will enable us to identify and address human rights incidents.
- Provide relevant employees and contractors with the knowledge and resources to manage human rights issues.
- Require private security providers to implement policies and practices for hiring, training and daily conduct that are in line with the Universal Declaration of Human Rights and the Voluntary Principles on Security and Human Rights.
- Maintain a dialogue on security and human rights concerns related to its operations with host governments and follow-up on investigations into reported incidents.
- Monitor and report on our human rights performance.

Where there is a reasonable possibility of human rights concerns in our areas of operations, Gran Tierra will voluntarily conduct, or have conducted, a Human Rights Risk Assessment. Any material risks identified in our operations through such Risk Assessments will be promptly and thoroughly addressed through development and implementation of corresponding prevention and/or mitigation plans.

Our employees, as well as our contractors, are required to comply with this policy.

"Signed" by Gary S. Guidry President and CEO February 09, 2018