

2021



GULFPORT ENERGY

BUSINESS CODE OF CONDUCT AND ETHICS



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Code of Conduct

May 2021

Preface

As we work to unlock our full potential as an independent E&P company, it is important to take the time to renew our commitment to the core values that shape Gulfport – integrity and respect, continuous improvement, social responsibility, collaboration and environmental stewardship. These values are the foundation for our work. Implementation of our core values result in a Company that has an inclusive and aspiring culture, and the focus and ability to create sustainable value.

The Code helps us understand how to operate our business ethically, and with integrity, and guides us on how we can live our core values. The set standards described in this Code reflect Company policy as well as the laws that we must all follow. The Code applies to all of us at Gulfport Energy – employees, officers and directors alike. We expect contractors and other individuals who work on our behalf to also be guided by these standards. Failing to comply with the Code could put you, your colleagues, and Gulfport at risk and, accordingly, could result in disciplinary action and even dismissal.

The Code is an important resource for knowing your responsibilities as you act on behalf of Gulfport. Your continued dedication to compliance and ethical business conduct enables us to grow and fulfill our goals as an independent E&P company.



Timothy J. Cutt

Chairman and Interim Chief Executive Officer



Introduction

The Code of Conduct (the “Code”) describes Gulfport’s core values and our expectations for how you act when conducting business. Gulfport is committed to acting ethically and conducting business in compliance with all applicable laws. Although the Code does not explicitly address every issue or situation you may encounter at Gulfport, it contains the guidelines, rules, and principles that must be followed when you are acting on Gulfport’s behalf. We expect all employees, officers, directors to follow this Code, and whether we are working on behalf of Gulfport or one of its subsidiaries to also be guided by these standards.

Who We Are

Our core values are our guiding principles. They provide a framework for leadership, daily decisions, and how we conduct our business in a socially responsible and ethical manner. Our values are more than aspirations; they define who we are.

Integrity and Respect

Continuous Improvement

Social Responsibility

Collaboration

Environmental Stewardship

Our Responsibility

We are all responsible for recognizing ethical issues and doing the right thing in all business activities. You should familiarize yourself with all Gulfport policies and the Employee Handbook, which describe in greater detail Gulfport’s expectations for how employees act at work. Follow the controls that apply to you and your role, even if you feel pressured to do otherwise. Always seek guidance if you have questions or concerns when issues arise where the right ethical choice isn’t clear. Never hesitate to report concerns if you see something that doesn’t seem in line with the Code or our values. Asking questions and raising concerns early is the best way to ensure our actions and decisions are in line with our core values, policies and legal obligations.

If you are a supervisor of others, lead by example and always demonstrate the highest standards of behavior. Create an environment where team members understand their responsibilities and feel comfortable raising issues and concerns without fear of retaliation. If an issue is raised, take prompt action to properly address the concerns and correct problems that arise. Ensure that employees or contractors under your supervision understand the Code and that at Gulfport conducting business ethically is most important, even if behaving ethically means sacrificing a desirable business outcome.

Gulfport employees and contractors should always be truthful and ethical, acknowledge errors, be accountable for results, and do what we say we will do.

Who We Are

We accept responsibility and hold ourselves accountable for our work, our actions and our individual and collective performance. We embrace learning opportunities, new methods and technologies in an effort to continuously enhance performance.

We demonstrate a firm adherence to our code of values and treat all stakeholders fairly. We are honest with others and ourselves and we do what we say we will do. We hold one another in high regard, and value and demonstrate respect for the uniqueness of individuals and the varied perspectives and talents they provide.



We are dedicated to conducting our business in a way that ensures careful and responsible management of the environment in which we operate. We place the highest priority on the health and safety of our and our partners workforce.

We work together effectively and efficiently as a unified group to reach common goals. We are readily accessible to each other and willing to hear and consider all ideas and opinions free from reserve or pretense across all our business relationships.

We are committed to meeting the highest standards of corporate citizenship by embracing diversity, championing good corporate governance practices and making a positive impact on the communities where we do business.



Making Good Decisions

Before taking action when faced with a difficult situation, ask yourself the following:

- **Is it legal?**
Never proceed with any action that you believe may be illegal. If you need information about legal or regulatory requirements, talk with your supervisor or the General Counsel.
- **Is it consistent with the Code or company policy?**
You should never engage in any act that does not comply with the Code and Gulfport policy.
- **Is it consistent with our core values?**
Consider whether the action would be consistent with our company's core values.
- **If it were made public, would I be comfortable?**
Ask yourself if you would make the same decision if you knew that it would be made public.

We Speak Up

When in doubt, speak up! There are many resources to help you follow the Code or report a concern about any potential violations of the Code or Gulfport policy. The following teams are available to ensure that your question, issue, or concern is addressed in a timely and meaningful manner:

Managers and Senior Leadership are available to answer questions and are generally most familiar with Gulfport's guidelines that apply directly to the business activities in your organization.

Compliance helps promote an organizational culture of ethical behavior and compliance with the law and is responsible for oversight of the Code.

✉ compliance@gulfportenergy.com

Human Resources can explain and answer questions about employment, benefits, and workplace issues.

✉ humanresources@gulfportenergy.com

Gulfport Legal can help explain and interpret this Code and provide guidance about how to conduct business on behalf of Gulfport.

✉ legal@gulfportenergy.com

Internal Audit is available to answer questions about policies related to financial, company controls, and accounting matters.

Our confidential Ethics & Integrity Helpline is available 24 hours a day, seven days a week. It is independent, secure, and confidential.



Speak Up Online

https://irdirect.net/GPOR/whistleblower_iframe



Speak up Helpline

(800) 916-7037

Non-Retaliation Policy

Any retaliatory acts, or the threat of retaliatory acts, against any employee or contractor for reporting, in good faith, known or suspected misconduct, or for participating in the investigation of a report will not be tolerated. Examples of retaliatory acts include dismissal, discipline, demotion, or mistreatment. We will make every effort to protect the confidentiality of reports of concerns and the identities of those who make reports or participate in an investigation. However, there may be instances when, due to the nature of an investigation or certain legal requirements, it is necessary to disclose someone's identity. In those instances, we will work closely with the reporting individual to address any questions or concerns.

Non-Retaliation Policy

The background of the slide features a warm, orange-toned photograph of an industrial facility. In the center, there are silhouettes of two workers wearing hard hats, facing each other. To their right is a large, prominent valve wheel. The scene is backlit by a bright light source, creating a strong glow. In the bottom right corner, there are several thick, parallel diagonal lines in white and light orange.

Reporting Misconduct in Good Faith

By reporting our concerns in good faith, we are acting with integrity and helping to preserve our ethical culture. Our company will protect anyone who reports known or suspected misconduct involving Gulfport. Individuals who retaliate, or who threaten to retaliate, against an employee or business partner for reporting a concern or cooperating with a Gulfport investigation is in violation of this Code and will be subject to disciplinary action, up to and including termination.

We Cultivate a Safe and Inclusive Workplace

An Environment Built on Respect and Inclusivity

At Gulfport we believe that a supportive and inclusive workplace where everyone feels valued and included is key to achieving our goals. We believe that diversity — including different backgrounds, experiences, perspectives, insights, and skills — fuels innovation and creates a broader connection to the world. Valuing inclusion promotes believing in the workplace, and creating equal opportunities for all employees helps make Gulfport a great place to work.

Gulfport Is an Equal Opportunity Employer

Gulfport does not unlawfully discriminate in any employment decisions, including hiring, compensation, promotion, discipline, or termination. This includes discrimination on the basis of “protected characteristics.” Gulfport is also committed to providing reasonable accommodations to qualified individuals with disabilities and individuals with sincerely held religious beliefs and practices.

Protected characteristics include:	▪ Genetic information	▪ Religion (including beliefs and practices or the absence thereof)
	▪ Marital status	▪ Sexual orientation
▪ Age	▪ Medical condition	▪ Military or veteran status
▪ Ancestry	▪ Mental or physical disability	▪ Other considerations protected by federal, state, or local law
▪ Color	▪ National origin	
▪ Gender	▪ Protected family care or medical leave status	
▪ Gender identify or expression	▪ Race	

Preventing Workplace Discrimination, Harassment and Violence

We strive to maintain a professional environment based on respect, tolerance, and inclusion. Discrimination or harassment will not be tolerated. Conduct that creates an unwelcome or uncomfortable situation or hostile work environment may be considered workplace harassment. Our policy extends to all employees as well as vendors, suppliers, contractors, consultants, and customers.

We are committed to providing a healthy and safe work environment for employees and others. Gulfport will not tolerate any violent behavior at the workplace and prohibits bringing weapons to any Gulfport facility, events, or worksite, except as specifically stated in the Weapons Policy.

Speak up right away if you experience or witness any violation of this policy. No adverse employment action will be taken against any person for making a good-faith complaint or report of discrimination or improper conduct, assisting in an investigation, or exercising rights under applicable laws. Retaliation against any person for any such protected activity will not be tolerated.

Anti-Harassment, Anti-Discrimination and No Violence Policy

Weapons Policy

Equal Employment Opportunity Policy



Report Work-Related Injuries

Immediately report any work-related injuries or illnesses and/or any safety or security threats to Gulfport Security at (888)330-8370.

Environmental, Health and Safety

Among our chief priorities — and key to leading a responsible energy future — is providing a safe and healthy workplace by implementing environmentally sustainable best practices when conducting our operations. We view such conduct as essential to successfully executing our business strategies. It is critical to Gulfport to protect the environment and the health and safety of our employees, business partners and members of the communities in which we operate.

Each of us is responsible for observing all of the environmental, health and safety rules that apply to our jobs and taking precautions to protect ourselves, our fellow employees and our other stakeholders. Each of us must promptly report and take immediate steps to correct all accidents, injuries or unsafe or unhealthy conditions. In addition, each of us has the obligation to stop work activities that we believe represent a threat to safety of others or the environment. If you have a concern about workplace health and safety or environmental performance, you must contact your supervisor or appropriate environmental, health and safety representative.

Environmental Policy

A Drug-Free Workplace

We strive to maintain a professional, drug-free work environment. Use of alcohol, illegal drugs, or controlled substances, whether on or off Gulfport premises, can detract from work performance, efficiency, safety, and health and seriously impair an employee's contributions to Gulfport. Specifically, Gulfport policy prohibits:

- Possession or use of an illegal or controlled substance or being under the influence of an illegal or controlled substance while on the job
- Driving a vehicle while on Gulfport business while under the influence of alcohol or an illegal or controlled substance
- Distribution, sale, or repurchase of an illegal or controlled substance while on the job

Substance Abuse Policy

WORKSAFE

We Protect Privacy, Information and Company Property

Gulfport Assets and Resources

Gulfport provides employees and contractors with information and technology (IT) resources so they can most effectively perform their jobs. These resources are Gulfport's property and must be used in a manner that reflects positively on Gulfport and all who work here. Gulfport reserves the right to monitor and inspect the use of its information and technology resources.

Limited personal use of IT resources is permitted but must not interfere with an employee's work performance or the work performance of others.

To the extent you operate a vehicle on Gulfport business, whether the vehicle is owned, leased or rented by Gulfport (or is your personal vehicle), you should do so in a safe manner.

Fleet Policy

IT Acceptable Use Policy

Protection of Gulfport Assets Policy

Use good judgement when using Gulfport equipment; always ensure that personal use does not interfere with your work environment or in any way violate our policies.

Protection of Confidential and Proprietary Information

We are committed to handling all confidential and proprietary information with great care and in compliance with applicable laws. Employees and contractors routinely learn information that is confidential and/or proprietary to Gulfport, our customers, our suppliers, and/or our partners. The confidential and proprietary information with which you are entrusted is extremely important to Gulfport and to others.

You are expected to keep all confidential and proprietary information concealed unless and until that information is released to the public through approved processes. This means that you may not discuss confidential or proprietary information with others, including family, friends, and even other employees or contractors, unless they have a legitimate business need to know the information.

You should also take great care not to disclose confidential or proprietary information inadvertently.

Confidential information includes but is not limited to:

- Gulfport's corporate expenditures, business performance, business plans, well results, leasing activities, acquisition targets, geological prospects, or ongoing legal or compliance actions
- Statements about an upcoming quarter future periods, or information about JV partners including conversations with Wall Street analysts, press, or other third parties (including friends)
- Comments, photos, video, or other information in the event of an operational emergency or crisis communication

If a member of the media, analyst community, or social media community reaches out to you, please do not respond. Instead, contact your supervisor, Investor Relations, or the Legal Department.

Competitive Intelligence

We may not gather information about our competitors using deception, theft, misrepresentation or other illegal or unethical means. We must be careful not to request confidential information from our vendors and business partners or from new hires about their former employers. In addition, we must not share confidential information we may have about our former employers with Gulfport. When leaving the company, we may not download, remove or otherwise take company information with us.

Cybersecurity

We are required to maintain confidential passwords for Gulfport's network, systems, and mobile devices. In the event a password is compromised or thought to be compromised, we are required to change the password immediately and notify the IT Security Department.

We are required to report lost, stolen or damaged equipment to the IT Helpdesk. Stolen equipment will additionally require a police report. Employees may be responsible for reimbursing the Company.

IT Acceptable Use Policy

Social Media and External Communications Policy

Public Disclosures

All information disseminated outside of Gulfport (for example, to the media, investors, or the general public) must be accurate, complete, and consistent. All disclosures in public or regulatory communications must be full, fair, accurate, timely, and understandable.

Information about Gulfport or its business activities should be shared only by an approved Gulfport spokesperson. Please refer press inquiries, industry analyst inquiries, financial and investment questions to the Gulfport Investor Relations Department. Do not attempt to answer these questions yourself, and be sure to advise your supervisor of the inquiry.

If a member of the media or someone not associated with Gulfport appears unexpectedly at a Gulfport facility, event, or colocation center, immediately report it and do not discuss Gulfport business with any such person.

Social Media

If you choose to engage in personal external Social Media activities, you must do so outside of the Company's core business hours and must be in compliance with all aspects with company policy. You should be aware that no matter how restrictive your privacy settings are within Social Media areas, your posts may become public, and may be archived or otherwise saved indefinitely by third parties.

Any information an employee creates, transmits, downloads, exchanges, or discusses using Company property may be accessed by the Company at any time without prior notice.

We Compete Fairly and Honestly

Accurate Records

The public relies on Gulfport to provide complete, timely, accurate, and understandable information. This also helps us make smart business decisions and meet our financial, audit, and other regulatory obligations. All employees and contractors are responsible for the accuracy of Gulfport's records and financial statements and must always:

- Create and keep truthful, clear, and accurate financial records
- Follow Gulfport's expensing, contracting, and purchasing requirements and obtain appropriate authorization
- Never record false or sham transactions, and avoid side letters
- Preserve, retain, and dispose of records appropriately, including in compliance with legal or other hold requests
- Cooperate with audits and investigations
- Never hide the true nature of any transaction
- Report any activity you believe is questionable

Employees and contractors with financial reporting responsibilities have special ethical obligations to act with the highest levels of honesty and integrity, avoid conflicts of interest, and promote accountability to this Code. It is important for these individuals to be able to recognize significant risks; know when to seek legal advice; and promptly report to the Chief Executive Officer, the General Counsel, and/or the Chair of the Audit Committee any conduct believed to be a violation of laws, business ethics, or any provision of this Code.

Business Travel and Expense Policy

Create and maintain business records that accurately reflect the truth of the underlying transaction to help us ensure that our financial statements are accurate.

Report Conflicts of Interest

Immediately report any known or suspected conflicts of interest to the Ethics & Integrity Helpline at (800) 916-7037.

Conflicts of Interest

Gulfport employees and contractors are expected to act, at all times and in all ways, in the best interest of Gulfport while performing their job duties. To put it simply, you must avoid conflicts of interest.

A conflict of interest exists when loyalties to Gulfport are impacted by personal interests or the interests of a third party. All employees and contractors must use good judgment and consult with others to avoid situations that create actual, potential, or perceived conflicts of interest. The best practice in any situation that appears to present a conflict of interest is to not act until you can discuss the situation with your manager, our Legal Department, or Compliance. Failure to avoid or disclose any actual or potential conflicts will result in disciplinary action, up to and including termination.

If Gulfport determines that the activity interferes with your ability to perform your role or it poses an actual conflict of interest for Gulfport, we may ask you to terminate the activity.

Conflicts of Interest Policy

Transparency is key. Having a conflict of interest does not necessarily violate the Code, but not disclosing the conflict does. Speak with your manager or Compliance to disclose.

Potential conflicts of interest are not uncommon or necessarily prohibited, so long as they are properly disclosed and managed. They can appear in many different forms, including:

- Working with a family member or close friend
- Transacting Gulfport business with family members or other related persons
- Accepting excessive gifts, entertainment, or other business courtesies related to your role at Gulfport, either directly or through a family member or a close friend
- Entering into a personal relationship with a subordinate, supervisor, or manager unless such relationship is disclosed to an uninvolved manager and to Human Resources
- Outside employment, advisory roles, board seats, or personally owned businesses
- Gulfport's investing in a company in which you are a stockholder or a director
- Personal investments in companies that directly compete with or are similar to Gulfport, or that Gulfport has invested in
- Business opportunities found through Gulfport duties

Gifts and Business Entertainment

We purchase others' products and services on the basis of price, quality, and service. Accordingly, all business dealings must be impartial, objective, and free of corruption and improper influence.

Moderate, proportional, and properly recorded business entertainment and gifts can create goodwill and sound working relationships. However, before any gift or business entertainment is offered or accepted by any employee, family member of an employee, or agent, it must first meet all of the following criteria:

- Not cash or a gift card
- Consistent with customary business practices
- Reasonable in value
- Open and transparent
- Cannot reasonably be construed as a bribe or payoff
- Does not violate any laws, regulations, or applicable policies of the other party's organization

You may not receive any income or material gain from a third party in connection with the performance of your Gulfport duties.

Gift and Entertainment Policy

Never offer or accept loans, stock, cash, or gift cards.

Always report activity or payments that even appear to be ethically questionable.

Preventing Improper Payments

We are truthful and transparent in our interactions with our partners, and we do not influence their decisions through improper payments.

At Gulfport we never secure business through a bribe, kickback, or other improper benefit.

- We refuse to offer or pay bribes or kickbacks to anyone
- We prohibit corrupt payments of all kinds, including payments to secure permits or approvals, and small payments to speed up a routine government process (often known as a "Facilitating payment")
- In any deal, we avoid hidden terms or arrangements and reduce complexity wherever possible
- We use partners that have a reputation for integrity, and we report signs that a representative is unethical or could be paying a bribe
- We make sure that any gifts, hospitality, or travel we offer to government officials or customers is reasonable and appropriate
- We hire candidates based on their merits and do not make hiring decisions to benefit a customer or a government official
- If we make charitable donations, we do so to support a legitimate charitable cause, not as part of an exchange of favors
- We never solicit gifts or other business courtesies

Anti-Corruption Policy

We Respect Laws and Regulations

Compliance with Laws, Rules and Regulations

We value our excellent relationships with national, regional, state, and local government and have developed those relationships by working fairly and honestly with officials and others wherever it operates.

Employees and contractors must be truthful and straightforward in their dealings with governments and may not direct or encourage anyone to provide false or misleading information to any government agent or representative.

Insider Trading

Gulfport shares information with employees and contractors so that we can successfully perform our roles. At times you may receive confidential information regarding Gulfport or its customers, suppliers, or partners before it is made available publicly to outside investors.

Gulfport's employees, officers, directors, agents, and contractors must not trade, or tip others to trade, in Gulfport's or another company's securities while in possession of material, nonpublic information about that company.

Material means that an average investor would find the information important in making an investment decision. Nonpublic means that it's confidential information not yet shared with the public. Buying or selling securities by using this type of information — or tipping others to buy or sell — is a violation of insider trading laws and Gulfport policy.

You should not trade in a company's securities if you have material nonpublic information about that company. This includes Gulfport and other companies.

Anti-Boycott Laws

United States laws prohibit a company from taking action to support a boycott imposed by a foreign country upon another country that is friendly to the United States. If you receive a request in any way related to a foreign boycott that is not supported by the U.S. government, you must immediately report the request to the General Counsel.

Import and Export Laws

We deliver products and services all over the country. It is important that we abide by all trade restrictions that apply to these activities, including applicable import and export controls. Many factors dictate whether products, services, technology, data or information may move across borders, including the nature of the exported item, the destination and the end use or user. In certain instances, we must obtain licenses and government approvals to export or import an item or technology.

Antitrust Laws

United States antitrust laws are designed to promote competition and to preserve the free enterprise system. Antitrust laws prohibit, among other things, price fixing, bid rigging, creation of a monopoly, boycotts, certain joint bidding and tying arrangements, exclusive dealing and refusals to deal. Individuals who violate the antitrust laws may be jailed for up to ten years and fined up to \$1,000,000.

Antitrust laws are statutes developed by governments to protect consumers from predatory business practices and ensure fair competition. You are expected to comply with applicable antitrust laws and to not participate in any activity that could be considered a violation of antitrust laws. You should direct any questions regarding this provision or related policy to the General Counsel

Antitrust is a complex area and no policy or compliance manual can answer every question. Therefore, always keep in mind that the antitrust laws are intended to promote competition —winning sales by offering a better product at a lower price, or winning leases by offering a higher price or better terms.

If you have any questions about the guidance in Antitrust Policy and Compliance Manual, how the antitrust laws might apply to specific business situations, or concerns that the Company may be violating the antitrust laws, please contact the General Counsel or Legal Department.

Antitrust Policy and Compliance Manual

If you are uncertain about antitrust laws or the company policy, don't act. Ask first.

Four Major Federal Antitrust Laws in the United States:

- The Sherman Act outlaws agreements that unreasonably restrain interstate and foreign trade and prohibits monopolization and conspiracies and attempts to monopolize.
- The Clayton Act of 1914 regulates mergers and acquisitions, and prohibits specific types of conduct that may unreasonably restrain trade under certain circumstances, such as tying and exclusive dealing arrangements.
- The Robinson-Patman Act deals with discrimination in commodity prices, services (such as advertising), or facilities.
- The Federal Trade Commission Act also regulates business by declaring that unfair methods of competition and unfair or deceptive acts or practices are unlawful. It incorporates antitrust principles, insofar as anticompetitive conduct is concerned. It also addresses false, misleading, or unethical business practices, such as unfair or deceptive advertising.

We Care About Our Communities

Corporate Social Responsibility and Human Rights

We believe in the fundamental dignity of every human being and in respecting individual rights. We are committed to providing a respectful, inclusive workplace and a healthy, safe work environment free from harassment, discrimination, violence and intimidation. As we conduct business around the nation, we are committed to respecting human rights.

In all our operations:

- We condemn the use of forced labor and exploitative child labor and expect our suppliers to fully respect this principle.
- We respect employees' lawful freedom of association.
- We compensate our employees fairly to help ensure that basic needs may be met and provide our employees with opportunities to develop their knowledge, skills, and abilities.
- We hire, compensate, promote, discipline, and provide other conditions of employment based solely on an individual's qualifications and performance. We do not discriminate, at any level of Gulfport, on the basis of protected characteristics.
- We provide a safe and healthy work environment.
- We work to continuously improve our environmental performance by establishing goals that reduce the environmental impact of our business activities.

Political Contributions

You may support the political process through personal contributions, but they may not be on behalf of Gulfport. You also may volunteer your personal time outside of working hours to the candidates of organizations of your choice, as long as it does not use any Gulfport resources such as telephones, company email, computers, or supplies.

Gulfport will never require you to make personal political contributions, or reimburse or compensate you for making any political contributions.

Charitable Giving

Gulfport encourages our employees to volunteer and give back to their community by offering fundraising and volunteerism matches to organizations in which our employees are personally involved. However, as with political activities, employees may not use Gulfport resources to personally support charitable or other nonprofit institutions not specifically sanctioned or supported by Gulfport.

For more information about community activities supported by Gulfport, check out the Community Engagement page on the Gulfport intranet site.



Disciplinary Action

Gulfport will act promptly to investigate any reports of violations of the Code, Gulfport policy or the law. As these situations are often difficult, any reports will be addressed with appropriate sensitivity and confidentiality. All employees or contractors who report, are witness to, or are accused of a Code violation must cooperate fully with Gulfport's investigation. Issues will be addressed directly with the individuals involved, as appropriate.

Certification

I certify that I:

- Read the Code and related policies;
- Asked questions where I did not fully understand the Code or related policies;
- Understand how to report actual or potential ethics concerns and violations of the Code or related policies;
- Am not aware of any unreported actual or potential ethics concerns or violations of the Code or related policies; and
- This Code of Business Conduct does not create a contract of employment or in any way alter my at-will employment relationship with Gulfport Energy Corporation.

I further certify that I will report any actual or potential ethics concerns or violations of the Code or related policies.

Administration, Waiver, and Amendment

The Gulfport Board of Directors has established the standards of business conduct contained in this Code and, directly or through its committees, oversees Compliance. Gulfport's General Counsel has been given the responsibility of ensuring adherence to the Code and, while serving in this capacity, reports directly to the Board of Directors and its committees.

Gulfport is committed to continuously reviewing and updating our policies and procedures. Therefore, this Code is subject to amendment by the Board of Directors or its delegates. Any waiver of any provision of this Code must be approved in writing by the General Counsel or, with respect to directors and executive officers, the Board of Directors and will be promptly disclosed as required by federal securities laws and applicable stock exchange rules.

