

### **HUMAN RIGHTS AND ESG REPORT**

2020

### LETTER FROM OUR EXECUTIVE CHAIRMAN OF THE BOARD



During 2020, our company faced extraordinary challenges associated with the COVID-19 global pandemic. Throughout these difficult times, our employees have demonstrated significant strength and perseverance as they have continued to make daily sacrifices to provide high-quality services and humane and compassionate care to all those entrusted to our facilities and programs. Our corporate, regional, and field staff have remained focused on implementing best practices to mitigate the risks of the novel coronavirus. Ensuring the health and safety of all those entrusted to our care and of our employees has always been our number one priority.

Our COVID-19 mitigation initiatives have included:

- Increasing testing capabilities at our U.S.
   Secure Services facilities, including investing approximately \$2 million to acquire 45 Abbott Rapid COVID-19 ID NOW testing devices.
- Installing Bi-Polar Ionization Air Purification Systems at select U.S. Secure Services facilities to reduce the spread of airborne bacteria and viruses, representing a company investment of approximately \$3.7 million.
- Providing continuing access to facemasks and personal hygiene products.
- Implementing social distancing guidelines and practices.
- Working with our government agency partners and local health departments to make vaccinations available to those in our care.

We have also remained committed to advancing our company's Environmental, Social and Governance (ESG) objectives. Our third annual Human Rights and ESG report highlights our commitment to respecting human rights; the criteria we use to assess human rights performance; and our contract compliance program and independent verification of our performance by third party organizations. The report also incorporates updated disclosures and metrics for the calendar year 2020, in accordance with the Global Reporting Initiative (GRI) Standards: Core Option, related to the development of our employees; our adherence to ethical governance practices; and our efforts to advance environmental sustainability in the construction and operation of our facilities.

We are particularly proud of the continued success of our award-winning GEO Continuum of Care® (CoC). Despite the challenges associated with the COVID-19 pandemic, our CoC sites completed approximately 2.6 million hours of enhanced rehabilitation programming in 2020. Our academic programs awarded more than 1,200 high school equivalency degrees, and our vocational courses awarded close to 4,000 vocational training certifications. Our substance abuse treatment programs awarded more than 7,600 program completions, and we achieved over 34,000 behavioral program completions and more than 31,000 individual cognitive behavioral sessions. We also provided post-release support services to more than 3,600 individuals returning to their communities, with over 1,300 post-release participants attaining employment.

For over 30 years, we have been a trusted service provider to government agencies in the United States and internationally, delivering innovative private sector solutions that help meet public-sector challenges. We are proud of our collective success, which is underpinned by the dedication of our employees and our organizational commitment to operational excellence. We look forward to continued engagement with our diverse stakeholders as we pursue our ESG goals and aspirations.

George C. Zoley

Executive Chairman GEO Board of Directors

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# ABOUT THIS REPORT AND FORWARD-LOOKING INFORMATION

#### **ABOUT THIS REPORT**

GEO's third annual Human Rights and ESG Report addresses our company's aspirational goals as a leading government services provider. We recognize that our approximately 18,500 employees worldwide, who have demonstrated significant strength and dedication during the COVID-19 pandemic, are not always able to achieve their best efforts and our company's desired best outcomes. As such, we are committed to continuous improvement in the areas of human rights, environmental, social, and governance activities. This report references the United Nations Guiding Principles on Business and Human Rights, and it has been prepared in accordance with the GRI Standards: Core option.

This report covers calendar year 2020, with three years of data where available.

#### FORWARD-LOOKING INFORMATION

This report contains certain forward-looking statements based on our management's current assumptions and expectations, including statements regarding our goals, commitments, programs and other business plans, initiatives and objectives. These statements are typically accompanied by the words "expect," "may," "could," "hope," "believe," "would," "might," "estimate," "anticipate," "plan," "aspire" or similar words. All such statements are intended to enjoy the protection of the safe harbor for forward-looking statements provided by the Private Securities Litigation Reform Act of 1995, as amended.

Although we believe there is a reasonable basis for the forward-looking statements made in this report, our actual future results, including the achievement of our targets, goals or commitments, could differ materially from our projected results as the result of changes in circumstances, assumptions not being realized, or other risks, uncertainties and factors.



**GEO** Headquarters

Such risks, uncertainties and factors include the risk factors discussed in Item 1A of our most recent Annual Report on Form 10-K filed with the Securities and Exchange Commission ("SEC") and our subsequent Quarterly Reports on Form 10-Q, as well as, with respect to our goals and commitments outlined in this report or elsewhere, the challenges, assumptions, risks, uncertainties and other factors identified in this report. You should consider the forward-looking statements in this report in conjunction with our Annual Report on Form 10-K and our subsequent Quarterly Reports on Form 10-Q and Current Reports on Form 8-K filed with the SEC.

The forward-looking statements in this report are made as of the date of this report, unless otherwise indicated, and we undertake no obligation to update these forward-looking statements to reflect subsequent events or circumstances, except as required by law.

### **ABOUT THE GEO GROUP**

The GEO Group, Inc. (NYSE:GEO) specializes in the design, financing, development, and delivery of support services for secure facilities, immigration processing centers, and community reentry centers in the United States, Australia, South Africa, and the United Kingdom.

GEO provides complementary, turnkey solutions for numerous government agencies worldwide across a spectrum of diversified secure facility support services, in-custody rehabilitation, community reentry programs, and electronic monitoring services.



- To implement best practices that follow recognized global Human Rights standards and respect the dignity and basic human rights of all individuals in our care.
- To be a leading provider of enhanced incustody rehabilitation programs and postrelease support services through our awardwinning GEO Continuum of Care®.
- To provide quality support services that foster a safe and humane environment, deliver high quality medical care, and adhere to independent accreditation standards.
- To provide development opportunities to our workforce and to instill an organizational culture rooted in diversity, inclusion, and respect.
- To advance environmental sustainability in our facilities by investing in energy conservation measures and following independent Green Building certification standards.



IN 2020, GEO'S WORLDWIDE OPERATIONS INCLUDED THE OWNERSHIP AND/OR SUPPORT SERVICES FOR:

93,000 Beds

Secure facilities, immigration processing centers and community reentry centers

22,000 Employees Worldwide



### **CORE VALUES & MISSION STATEMENT**

GEO aspires to be the world's leading provider of evidence-based rehabilitation across a diversified spectrum of secure and community reentry facilities and programs. We are constantly refining and seeking to expand our rehabilitation programs to reach greater numbers of individuals in our care and post-release through our GEO Continuum of Care®\*.

### **OUR MISSION**

GEO's mission is to develop innovative public-private partnerships with government agencies around the globe that deliver high-quality secure facility, community reentry, and electronic monitoring services, while providing enhanced rehabilitation and community reintegration programs to the men and women entrusted to our care.



### **OUR VALUES**

### **Respecting Human Dignity and Rights**

We believe every human being should be treated with dignity and that his or her basic human rights should be respected and preserved at all times.

### **Providing Leading, Evidence-Based Rehabilitation Programs**

We are committed to providing leading, evidence-based rehabilitation programs and post release support services to the men and women entrusted to our care.

### Imparting a Safe and Secure Environment

We are committed to establishing and maintaining a workplace that is safe, secure and humane, not only for our trained and experienced employees, but also for the men and women entrusted to our care.

#### **Maintaining Quality Facilities**

We are committed to maintaining modern facilities that provide a safe and humane environment and adhere to independent accreditation standards.

\*See the section of the ESG Report on the GEO Continuum of Care® and the details provided on our website at geogroup.com/CoC.

### GEO GROUP ESG PROCESS, RATIONALE AND OBJECTIVES

Since our founding more than 30 years ago, GEO has become a leader in the delivery of high-quality secure facility services, community reentry programs, and evidence-based rehabilitation.

We are committed to ethical practices in all aspects of our business. Everywhere we operate, we comply with strict standards established by our government agency partners, including the U.S. federal government, state governments, and local jurisdictions. Through rigorous processes implemented across our operations, we also adhere to operational and management guidelines developed by independent accreditation entities applicable to our services.

We provide extensive training for our employees in compliance with the requirements of our government agency partners, along with standards set by regulators and reinforced by accrediting organizations, to prepare them to meet the rigorous performance objectives of the positions they hold within our organization.

We strive daily to provide pathways and ongoing support for those in our care to achieve their rehabilitation objectives and re-enter their communities as productive citizens.

Several years ago, we undertook a pilot initiative – known as the GEO Continuum of Care® – to address the societal challenge of recidivism.

This award-winning program – which we are continually refining – has proven effective at helping those in our care change their perspective, earn educational and vocational credentials as they prepare for re-entry into society, receive support upon release, and significantly improve their opportunities for personal success.

### OUR COMMITMENT TO RESPECTING HUMAN RIGHTS

GEO has always maintained a strong commitment to respecting human rights, which extends to all our employees, our contractors, and the individuals entrusted to our care. To protect human rights, our commitment is informed by external standards including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights, as well as the International Labor Organization's eight core conventions.

Our board of directors demonstrated this commitment by adopting a Global Human Rights Policy in 2013. The policy is reviewed regularly and incorporates protections for civil liberties and freedom of speech. Our policy is available here: <a href="mailto:geogroup.com/geo-global-human-rights-policy">geogroup.com/geo-global-human-rights-policy</a>.

As part of this policy, we provide a safe and secure environment, nutrition, clothing, sanitation, access to legal representation and materials and timely access to medical and dental care as required by our government contracts. At all of our facilities, we provide climate-controlled environments for those in our care. For more details see the Human Rights section of the full ESG Report.



### **MATERIALITY INDEX**

#### GEO GROUP'S MATERIALITY-BASED APPROACH TO ESG

To inform this ESG Report, GEO retained an independent third-party to perform an ESG materiality assessment.

The assessment began by examining a range of ESG data providers, as well as studying peer company ESG disclosures, to conduct a materiality analysis for ESG topics, including Global Reporting Initiative (GRI) Standards.

Each topic was prioritized based on an analysis focusing on their relevance and potential impacts.

From this research, each ESG topic received an overall materiality score to help focus our strategy and disclosures for this report.

The materiality matrix shows the relative weight of different topics from two perspectives. The Y axis shows how important an issue is considered by peer company ESG disclosures, while the X axis shows the topic's importance to ESG data providers.

#### **Materiality Assessment**

#### **Table Key**

- Environmental
- Social
- Governance



**Importance to ESG Data Providers** 

### WHAT WE DO

- We believe GEO facilities are, by comparison, among the best in the U.S. and the world.
- We believe GEO facilities are substantially newer than the majority of government facilities, and are all fully air-conditioned.
- Less than 8% of the U.S. corrections and detention facilities are managed and/or operated by private-sector contractors.
- We believe GEO facilities are highly rated by independent accreditation entities including the American Correctional Association, the National Commission on Correctional Health Care, and the Joint Commission.
- We advocate for public-private partnerships that deliver private sector solutions to public sector challenges with strict government oversight.
- GEO facilities typically have on-site, full-time government monitors.
- We are a federal government services provider delivering support services, including transportation, civil detention, and alternatives to detention to the U.S. Department of Homeland Security (DHS).
- We believe we provide quality support services for modern immigration processing centers under contracts with DHS, which have such amenities as 24/7 access to healthcare, including medical, dental, and mental health services; multilingual informational 'Know Your Rights' materials and translation services; artificial turf soccer fields; flat screen TVs in living areas; indoor and outdoor recreation; classrooms and multipurpose rooms; and leisure and legal libraries.
- We proudly operate in accordance with the the DHS Performance-Based National Detention Standards, inclusive of applicable waivers, established under President Obama's Administration.
- We believe we provide safe and humane residential care for individuals during the adjudication of their civil immigration cases, with an average length of stay of approximately 60 days.
- With respect to our state customers, GEO is proud to be a world leader in offender rehabilitation through our award-winning GEO Continuum of Care® program.

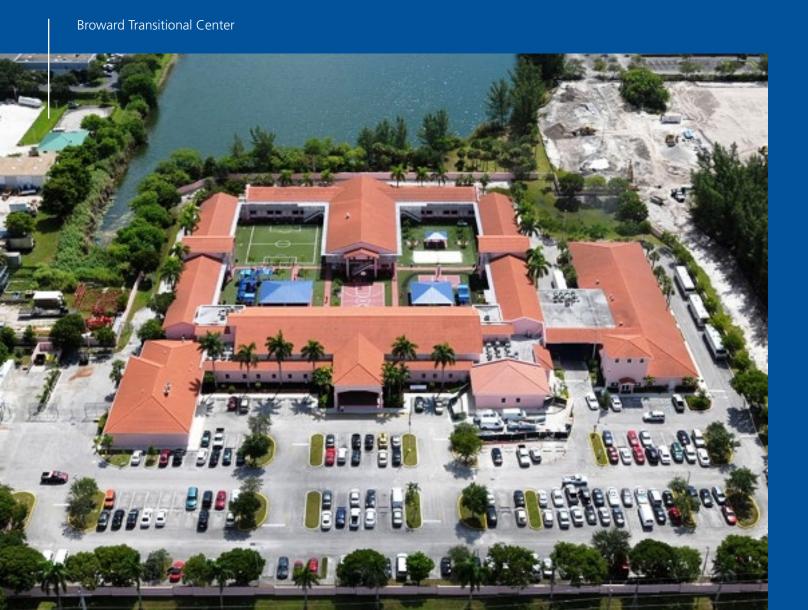


- The GEO Continuum of Care® (CoC) is enhanced in-custody offender rehabilitation programming, including cognitive behavioral treatment, integrated with post-release support services.
- At the Corporate Office level, the CoC Program is administered by the GEO Continuum of Care® (CoC) Division with subject matter experts in education, cognitive behavioral treatment, substance abuse treatment, postrelease services, CoC training, and quality assurance.
- On any typical day, there are approximately 20,000 participants enrolled in GEO offender rehabilitation programming, which resulted in 2.6 million programming hours completed during 2020 despite COVID-19 pandemic restrictions.
- GEO's CoC rehabilitation program includes cognitive behavioral therapy that identifies the individual's criminogenic risks and develops an appropriate treatment plan.
- The Corporate CoC Division Case Managers coordinate with the facility Case Managers regarding the progress and eventual release of the CoC participants.
- At GEO's Corporate Office, a team of Post-Release Case Managers provide post-release support services on a 24/7 basis, aiding individuals in fulfilling their most critical needs following their release back into the community.
- Identified needs include housing, clothing, food, employment, and transportation assistance.

### WHAT WE DON'T DO

- We don't provide services for any shelters or facilities housing unaccompanied migrant minors.
- We don't provide services for any border patrol holding facilities along the U.S. Southwest border or anywhere in the United States.
- We don't provide services for any facilities with tent structures or chain-link fencing in housing areas.
- We don't provide services for any facilities that are overcrowded.

- We don't deny care or treatment to detainees who are pregnant, ill or suffering from mental illness.
- We are not involved in forced separation of families.
- We do not subject any individuals in our care to forced or involuntary labor. At many GEO Facilities, GEO administers a Voluntary Work Program in accordance with government agency partner directives and standards.
- We don't play a role in passing criminal justice or immigration laws, and we don't advocate for or against criminal justice or immigration enforcement policies.



# Executive Summary of The GEO Group's Response to 2016 DOJ OIG Report on Contracted Federal Prisons

The Department of Justice, Office of Inspector General issued a report (the "OIG Report") in August 2016 titled "Review of the Federal Bureau of Prisons ("BOP") Monitoring of Contract Prisons."

We believe the OIG Report was not only flawed, from an analytical basis, but the underlying data in fact revealed that the contracted facilities were as safe, if not safer, than the publicly operated facilities.

### **Flawed Comparison**

- We believe the OIG Report was inherently flawed since it offered an apples to oranges comparison of non-similar facilities.
- The DOJ OIG selected 14 low-security prison facilities operated by the BOP with a total of 22,600 inmates, mostly U.S. citizens, and only 12% criminal aliens.
- The private sector comparison involved 14 low-security, contracted facilities with a total of 28,000 inmates, of whom 96% were criminal aliens that came from approximately 90 foreign countries.
- Consequently, we believe this was not a fair comparison of similar inmate populations between the public and private sector facilities.
- Even the BOP expressed skepticism regarding the OIG Report by stating:

"We continue to caution against drawing comparisons of contract prisons to BOP operated facilities, as the different nature of the inmate populations and programs offered in each facility limit such comparisons."

# We Believe the Underlying Data Shows Contracted Facilities Were As Safe, If Not Safer, Than Public Facilities

- We believe the data in the OIG Report showed that contracted facilities were, in many respects, actually safer than the public facilities.
- According to the data in the OIG Report, the contracted facilities performed better in several very key categories, per each 10,000 beds:
  - Fewer deaths: 54 deaths in the contracted facilities, versus 127 in the public facilities
  - Fewer drug confiscations
  - Fewer inmate fights
  - Fewer suicides
  - Fewer disruptive behavior incidents
  - Fewer uses of force
  - Fewer overall grievances
  - Fewer medical and dental grievances
  - Fewer grievances in the Special Housing Units
  - Fewer positive drug tests
  - Fewer guilty findings of inmate sexual misconduct against inmates
  - Fewer allegations of staff sexual misconduct against inmates
- We believe these findings from the OIG Report confirm the contracted facilities were as safe, if not safer, than public facilities.

Read GEO's Detailed Response to the 2016 DOJ OIG Report on BOP Contracted Facilities:

geogroup.com/GEO2016OIGResponse

### **GEO BOARD OF DIRECTORS**



### **GEORGE C. ZOLEY** | EXECUTIVE CHAIRMAN OF THE BOARD

Mr. Zoley is GEO's Executive Chairman of the Board. He served as Chairman, CEO and Founder until July 1, 2021. Mr. Zoley founded GEO in 1984 and continues to be a major factor in GEO's development of new business opportunities in the areas of correctional and detention support services, community reentry, offender rehabilitation, and other diversified government services.

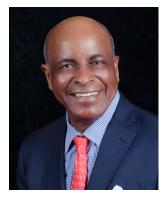
Areas of Expertise: • Company Founder • Strategic Leadership
 • Business Development • Government Contracting



### JOSE GORDO | CHIEF EXECUTIVE OFFICER

Mr. Gordo is GEO's Chief Executive Officer and a member of GEO's Board of Directors. Mr. Gordo has over 20 years of experience in business management, private equity, corporate finance, and business law. Prior to joining GEO, Mr. Gordo had been serving as the Managing Partner of a general partnership that invests in and actively oversees small and medium-sized privately held companies. Mr. Gordo was previously a partner at the national law firm of Akerman LLP.

Areas of Expertise: • Business Management • Corporate Finance• Corporate Law



**RICHARD H. GLANTON** | LEAD INDEPENDENT DIRECTOR\*, CHAIR, AUDIT AND FINANCE; COMPENSATION; AND NOMINATING AND GOVERNANCE COMMITTEES

Mr. Glanton is the Founder, Chairman, and Chief Executive Officer of Electedface, Inc. Mr. Glanton has extensive experience in corporate governance, having served as a director of other publicly-traded companies. His leadership roles in other business activities are important qualifications for GEO's Board of Directors.



### JULIE M. WOOD | INDEPENDENT DIRECTOR\*

Ms. Wood is currently the Chief Executive Officer of Guidepost Solutions LLC, a company specializing in monitoring, compliance, international investigations and risk management solutions. Prior to joining the private sector, Ms. Wood served as the Head of U.S. Immigration and Customs Enforcement for the U.S. Department of Homeland Security from January 2006 until November 2008.

Areas of Expertise: • U.S. Department of Homeland Security (DHS)
 • U.S. Immigration and Customs Enforcement (ICE)
 • Performance-Based National Detention Standards (PBNDS)



### **SCOTT M. KERNAN | CHAIR, OPERATIONS AND OVERSIGHT COMMITTEE**

Mr. Kernan served as Secretary of the California Department of Corrections and Rehabilitation ("CDCR") from January 2016 until August 2018. Prior to that time, Mr. Kernan was appointed the Undersecretary of Operations of the CDCR beginning in September 2008 and served in that position until October 2011.

Areas of Expertise: • American Correctional Association (ACA) Standards
 • Core Correctional Practices



### **JACK BREWER** | INDEPENDENT DIRECTOR\*

Mr. Brewer founded The Serving Institute, his Liberty University affiliated faith sports-based academy for at-risk youth. He is an adjunct professor at Fordham Gabelli School of Business, where he teaches his business leadership and transition curriculum to athletes, as well as inmates in custody. In 2020, Mr. Brewer was appointed to the U.S. Commission on the Social Status of Black Men and Boys. He also leads efforts delivering emergency aid to thousands of people in Africa and the Caribbean.

Areas of Expertise: • Offender Rehabilitation • GEO Continuum of Care®
 Leadership Development for At-Risk Youth • Civil Rights Advocacy

International Aid and Humanitarian Work



### TERRY MAYOTTE | CHAIR, CORPORATE PLANNING COMMITTEE INDEPENDENT DIRECTOR\*

Mr. Mayotte held the position of Executive Vice President and Chief Financial Officer at Oasis Outsourcing, where he founded the organization in 1996 and was a principal architect of the company's business model and strategic direction.

Areas of Expertise: • Insurance • Finance • Business Management• Mergers and Acquisitions



#### **ANNE N. FOREMAN** | INDEPENDENT DIRECTOR\*

Mrs. Foreman was the U.S. Air Force former Under Secretary with responsibility for over 600,000 service members and civilian employees, a \$115 billion budget, and all acquisition, financial, environmental, manpower, audit, and international affairs. She previously served as U.S. Air Force General Counsel and Chief Ethics Officer; Operations Officer for the Central Intelligence Agency; and member of the career Foreign Service in the Middle East, North Africa, and at the U.S. Mission to the United Nations. She has extensive experience serving on corporate boards in the U.S. and U.K. and as Chair of governance, audit, compensation, and security committees for over 20 years.

Areas of Expertise: • Extensive Domestic and International Leadership
 High Level Government Contracting • Ethics, Compliance, and Security



### CHRISTOPHER C. WHEELER | INDEPENDENT DIRECTOR\*

Mr. Wheeler retired from Proskauer Rose LLP in January 2010, where he served as a member of the Corporate Department and a partner in the firm's Florida office for nearly 20 years. He has had extensive experience in real estate and corporate law, institutional lending, administrative law and industrial revenue bond financing.

Areas of Expertise: • Institutional Lending • Corporate and Real Estate Law

\* Applying NYSE Independence Standards

# PRIMARY BOARD COMMITTEES OVERSEEING COMPANY SERVICES/POLICIES

#### **OPERATIONS AND OVERSIGHT COMMITTEE**

The Operations and Oversight Committee reviews with management various issues relating to our operations that may arise from time to time. The committee oversees operational risks related to GEO's various operating divisions including GEO Secure Services and GEO Care.

Committee Membership: Scott M. Kernan (Chair), Jack Brewer,
 Richard H. Glanton, and Julie M. Wood

#### **HUMAN RIGHTS & ESG**

- Periodic review of ESG initiatives
- Annual review of Human Rights and ESG Report

#### **COVID RESPONSE**

Quarterly review of GEO's COVID response

#### **HEALTH SERVICES**

 Periodic Review of GEO's Health Services

#### **SECURITY SERVICES**

 Periodic review of GEO's Security Services

### IMPROVED OFFENDER REHABILITATION THROUGH GEO CONTINUUM OF CARE®

 Periodic review of GEO's rehabilitation and reentry programs

#### **CONTRACT COMPLIANCE ACTIVITIES**

 Periodic review of GEO's contract compliance and quality control program

### PRISON RAPE ELIMINATION ACT (PREA) REPORTING

Annual review of GEO's PREA Report



#### NOMINATING AND CORPORATE GOVERNANCE COMMITTEE

The nominating and corporate governance committee oversees GEO's corporate governance guidelines and Code of Business Conduct and Ethics. The committee also assesses board membership needs and composition, and recommends nominees to GEO's board of directors.

Committee Membership: Richard Glanton (Chair),
 Anne Foreman, and Christopher Wheeler

#### **CORPORATE GOVERNANCE**

- Annual recommendation of Board nominees
- Periodic review of GEO's bylaws
- Periodic review of GEO's Code of Business Conduct and Ethics



#### **POLITICAL CONTRIBUTIONS**

- Annual review of GEO's Political Activities and Contributions Policy
- Annual review of GEO's political contributions expenditures



#### LOBBYING EXPENDITURES

- Annual review of GEO's Political Activities and Contributions Policy
- Annual review of GEO's Lobbying expenditures



# DELIVERING ON OUR PROMISE: ETHICS AND GOVERNANCE

GEO's Code of Business Conduct and Ethics is built on the foundation of the rule of law, both in letter and spirit, and delineates the overarching principles that guide the organization and its employees in their daily activities and interactions with key constituency groups.

Our Code of Business Conduct and Ethics strives to promote the following objectives:

- Honest and ethical conduct
- Ethical handling of actual or apparent conflicts of interest
- Full, fair, accurate, timely and understandable disclosure
- Compliance with applicable government and self-regulatory organization laws, rules and regulations
- Promote the protection of GEO assets
- Promote fair dealing practices
- Prompt internal reporting of Code violations
- Assuring accountability for compliance with the GEO Code of Business Conduct and Ethics

GEO's Code of Business Conduct and Ethics is publicly available on our website at <u>geogroup.com/Code-of-Conduct.pdf</u>. It is also available to our employees in Spanish.

Throughout all of GEO's domestic and international operations, from our Board of Directors to our facility-level staff, GEO maintains high standards for ethical behavior and trains management and staff in support of our enterprise-wide emphasis on anticorruption. The Board's Audit and Finance Committee and Nominating and Corporate Governance Committee have oversight responsibility for these issues.

Specific sections of GEO's Code of Business Conduct and Ethics articulate the company's policies and guidelines with respect to compliance with anti-bribery and anti-corruption laws, government contracting, health and safety, conflicts of interest, accurate record-keeping, confidentiality, improper gifts,

### ANTI-DISCRIMINATION AND ANTI-HARASSMENT

Section 6 of GEO's Code of Business Conduct and Ethics articulates the company's anti-discrimination and anti-sexual harassment policy.

"... We are firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment of any kind. Employment decisions must be based only on an employee's or applicant's qualifications, demonstrated skills and achievements without regard to race, color, sex, national origin, religion, age, disability, veteran status, citizenship, sexual orientation, gender identity or marital status.

"Employees, officers, and directors must not engage in conduct that could be construed as sexual harassment. Unwelcome sexual advances, sexually suggestive statements or questions, offensive jokes, sexual innuendos, offensive touching or patting, requests for sexual favors, displaying or showing sexually suggestive material, and other verbal or physical conduct of a sexual nature may be forms of sexual harassment. You should report suspected instances of sexual harassment by anyone (including persons with whom GEO does business) immediately to your human resources contact."

political contributions, anti-discrimination and anti-sexual harassment, reporting illegal and unethical behavior, as well as senior leadership roles and responsibilities for meeting disclosure and accounting requirements set by the Securities and Exchange Commission.

Section 19 of GEO's Code of Business Conduct and Ethics establishes a "Special Code of Ethics

for the CEO, Senior Financial Officers, and Other Employees." This section also makes it incumbent on the part of any employee who identifies, learns of, or suspects a violation of proper and accurate disclosure to report this activity to GEO's General Counsel for investigation.

The standards and policies described in each section of GEO's Code of Business Conduct and Ethics are communicated widely throughout our organization and reinforced with each of our employees through rigorous and ongoing training.

At the time of hiring, all new GEO employees are provided a copy of GEO's Code of Business Conduct and Ethics, along with the GEO Employee Handbook, and are required to sign an acknowledgement form. In addition, all GEO employees are required to read GEO's Code of Business Conduct and Ethics and sign an acknowledgement form annually.





# BOARD OF DIRECTORS DIVERSITY

Board of Directors Diversity (2020-2018)	2020	2019	2018
# of Board of Directors Members	9	8	6
% of Underrepresented Minorities on the Board*	22%	25%	33%
% of Women on the Board	22%	25%	33%
% of Board Independence**	78%	75%	83%
% under Age 30	-	-	-
% Age 30 - 50	11%	13%	-
% over Age 50	89%	87%	100%

<sup>\*</sup> Includes Hispanic/Latino, Black/African American, American Indian/Alaska Native, Native Hawaiian/Pacific Islander, Asian, and two or more races.

### GEO'S BOARD OF DIRECTORS: INDEPENDENT, EXPERIENCED AND DIVERSE

GEO's Board of Directors is comprised primarily of external directors. The independent directors bring a wide range of complementary skills and experience that are relevant to our operations and give them the ability to provide valuable oversight and direction for our company.

Specifically, our Board Members have extensive experience in law, government

service, government contracting, finance, real estate, management, and international business. GEO and its stakeholders and shareholders benefit in many ways from the deliberate diversity of our board.

Additional information on individual members of the GEO's Board of Directors is available on our company's website at <a href="mailto:geogroup.com/board-of-directors">geogroup.com/board-of-directors</a>.

<sup>\*\*</sup>Applying New York Stock Exchange (NYSE) Independence Standards

### GEO'S OFFICE OF PROFESSIONAL RESPONSIBILITY

Under applicable laws, as a government contractor, and as established by GEO's Code of Business Conduct and Ethics, GEO requires a thorough investigation of all acts and allegations of staff misconduct. The Office of Professional Responsibility (OPR), at the direction of GEO's General Counsel, is responsible for investigating all acts and allegations of serious staff misconduct.

### **2020 Ethics & Compliance Statistics**

2000+ EthicsPoint Hotline Complaints Processed	922  OPR Investigations Open/Closed
384 Sustained Cases	41.6%  Sustained Closure Rate

OPR reviews more than 2,000 matters reported annually through the employee hotline or other reporting mechanisms and investigates all matters of serious staff misconduct.

#### WHISTLEBLOWER PROGRAM

Sections 16 and 17 of GEO's Code of Business Conduct and Ethics specifically discuss protections provided for employees who report suspected illegal or unethical behavior.

Section 16 ("Reporting any Illegal or Unethical Behavior") stipulates: "... Any employee may submit a good faith concern regarding questionable accounting or auditing matters without fear of dismissal or retaliation of any kind. Nothing in GEO's policy or Employee Complaint

Procedures for Accounting and Auditing Matters is meant to restrain whistleblowers from communicating with the SEC or violate Rule 21F-17 under the Securities Exchange Act of 1934 ..."

Furthermore, Section 17 ("Non-Retaliation for Reporting") states: "In no event will GEO take or threaten any action against you as a reprisal or retaliation for making a complaint or disclosing or reporting information in good faith .... GEO will not allow retaliation against an employee for reporting a possible violation of this Code in good faith. Retaliation for reporting a federal offense is illegal under federal law and prohibited under this Code. Retaliation for reporting any violation of a law, rule or regulation or a provision of this Code is prohibited. Retaliation will result in discipline up to and including termination of employment and may also result in criminal prosecution ..."

#### **ANTI-BRIBERY AND ANTI-CORRUPTION**

It is GEO's policy to comply with the requirements of all applicable anti-bribery laws, including the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, and similar local laws of jurisdictions where we operate. It is GEO's policy to require our agents, consultants and business partners to comply with those same laws and practices.

Certain activities related to government officials – such as providing gifts, political contributions, entertainment, travel-related benefits or facilitating payments – can violate domestic and foreign anti-bribery laws. Bribery of non-governmental officials is also illegal in many countries and violates GEO's Code of Business Conduct and Ethics.

Our Anti-Bribery Policy prohibits all forms of bribery, including domestic bribery. It requires assessments of all business partners, internal approvals, books and record entries, and imposes records retention requirements in key risk areas related to government officials and business partners. The Anti-Bribery Policy also requires audits to help ensure compliance, as well as appropriate due diligence of companies targeted for acquisition or as potential joint venture partners, particularly where the target companies have government contracts or other significant governmental interaction.

To reinforce our ongoing commitment to ethics and anti-corruption, GEO adheres to the American Correctional Association's industry-specific Code of Ethics, including its anti-corruption standards. All GEO field staff receive a minimum of 40 hours of training per year, including training regarding our Code of Business Conduct and Ethics, Global Human Rights Policy, and Gift Policy, among others.

#### **POLITICAL ENGAGEMENT**

As a company whose services are based on public-private partnerships with government agencies in the United States and around the world, GEO strives to maintain the highest level of ethics and compliance with respect to its government relations activities and political contributions.

GEO has been a trusted service provider to the federal government for over 30 years, and in that time, we have not advocated for or against, nor have we played a role in setting policies related to whether to criminalize behavior, the length of criminal sentences or the basis for an individual's incarceration or detention.

Corporate funds may be used to make political contributions where permitted by law. Political contributions using corporate funds are governed by GEO's Political Contributions Policy and their expenditure requires authorization and approval by our Chief Executive Officer, Chief Financial Officer, and GEO's Legal Department. Additionally, GEO's Board of Directors routinely engages with GEO's management, ensuring proper oversight.

#### INFORMATION SECURITY

GEO is committed to improving and investing in its cybersecurity infrastructure, as well as managing cybersecurity risks. GEO's resilience to cybersecurity threats and risks is essential to its operations and customers. To this end, GEO maintains an information security program, performs regular assessments of its environment, and adheres to standard industry practices and procedures. GEO also trains its employees on how to keep the organization secure and how to recognize and report potentially malicious cyber activity. Notwithstanding these measures, GEO knows that cyberattacks are difficult to prevent so there is a significant focus on early detection and response capabilities.



#### **CYBERSECURITY**

In August of 2020, GEO was subject to a sophisticated ransomware attack that impacted a portion of GEO's information technology systems and a limited amount of data. Despite the sophisticated attack, GEO's response was swift, demonstrating its commitment to protecting the personal information in its custody and care. GEO promptly launched an investigation, engaged legal counsel and other incident response professionals, and notified its customers and law enforcement in response to the incident.

From detection and throughout its subsequent investigation and response, GEO took quick, decisive, and proactive measures to address the incident, restore its systems and reinforce the security of its networks and information technology systems, cooperate with law enforcement. and communicate regular progress updates to its federal and state government agency partners. Due to successful continuity planning, GEO's operations were not significantly disrupted. Since the attack, GEO has continued to focus on strengthening our cybersecurity program to prevent future attacks.

### **HUMAN RIGHTS FOCUSED**

GEO acknowledges the unique status of its operations as a service provider to governmental agencies, encompassing the management and operation of secure correctional and rehabilitation facilities. immigration processing centers, community reentry centers and programs, and electronic and location monitoring services. We recognize the significant role that respect for human rights plays in our services in the United States and around the world.

Our commitment to respecting human rights is rooted in our Global Human Rights Policy, which is informed by reference to the United Nation's Universal Declaration of Human Rights and the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work. We acknowledge that the human rights of all persons in our care and of our employees are to be respected without discrimination, bias, or favoritism.

Over the years, GEO has been committed to respecting the human rights of all individuals in our care, including ongoing efforts to drive continuous improvement in the following areas, which are discussed in this section:

- Safe and Humane Environment
- Access to Healthcare
- Access to Legal Services
- Access to Family/Friends Communications
- Access to Religious Opportunities
- Access to Safe and Nutritious Meals
- Access to Recreational Amenities
- Access to Rehabilitation Programs for State Inmates

#### **HUMAN RIGHTS TRAINING**

We reinforce, promote and support our commitment to respect human rights through company-wide awareness and training programs. All new GEO employees — including our facility and program staff who work directly with the individuals in our care — are required to complete our human rights training. The GEO Group human rights training module is available on our website and can be accessed at geogroup.com/Human-Rights-Training.pdf.

In addition, GEO has a robust training program for staff at all levels of the organization. Our training of managerial, administrative, and security staff is based on independent standards set by the American Correctional Association (ACA). The training encompasses a minimum of 120 hours within the staff member's first year of employment and 40 hours of recurring training during each consecutive year of employment.

#### SAFE AND HUMANE ENVIRONMENT

We respect the right of all persons to have a safe and humane environment, and our commitment to this right is unwavering. Our goal of ensuring a safe and humane environment for everyone in our care calls for us to follow many sets of standards and laws that define and prescribe the daily operation of our facilities and programs.

For example, in compliance with the U.S. Department of Homeland Security's (DHS), Performance-Based National Detention Standards staffing at immigration processing centers is approximately 30% more than that of GEO's state correctional facilities. The additional healthcare staffing is needed to provide treatment for individuals arriving from countries with limited healthcare services.

GEO facilities, compared to the majority of public sector facilities, are newer, airconditioned, and provide better living conditions and enhanced rehabilitation programs:

- 95% of GEO's facilities are less than 25 years old, compared with approximately 33% of all state correctional facilities in the United States that are less than 25 years old.
- 100% of GEO's facilities are air-conditioned.
- 100% of the 800 academic and vocational classrooms in GEO's facilities have electronic SMARTboards for interactive computer assisted curriculum.

Our facilities are maintained to be compliant with life-safety codes, fire protection standards and regulations developed by the National Fire Protection Association (NFPA), Occupational Safety and Health Administration (OSHA), Environmental Protection Agency (EPA), and American Correctional Association (ACA). GEO employs over 80 safety and risk management professionals and works with a variety of outside consultants who maintain and monitor the safety of all our facilities.

GEO facilities utilize a classification plan to determine the needs and requirements for everyone in our care. The classification plan includes interviews, record reviews and other assessments to determine security levels, vulnerability status, medical requirements, appropriate housing and program assignments, and any special needs. Staff members involved with classification plans include professionals in the fields of medical and mental health care, programming and counseling, religious services, dietary and nutrition, and security.

Furthermore, GEO has a zero-tolerance policy for all forms of sexual abuse and sexual harassment in our facilities and programs and strictly follows the Prison Rape Elimination Act (PREA).

GEO has also implemented policies to provide restrictive housing when necessary, typically limited to those circumstances which threaten the secure and orderly management of each facility. These policies are consistent with policies and standards set by our government agency partners and adhere to all American Correctional Association standards.

## INNOVATIVE TECHNOLOGY ENHANCES SAFETY IN RESTRICTIVE HOUSING UNITS (RHU)

GEO staff provide regular supervision in Restrictive Housing Units. All individuals in a Restrictive Housing Unit must be personally observed at least twice per hour. GEO staff utilize the "PIPE Security System," which provides documentation for the frequency/ observation of each cell by a security staff member, utilizing an electronic handheld scanner, or "PIPE," designed to record rounds in the Restrictive Housing Units. During each round, security staff touch the handheld PIPE device to the sensor button located on each cell door. Physical contact with the sensor button is required in order for the device to record the cell check. The PIPE device records these rounds and stores the information in the device. At least twice per shift, the information is downloaded from the device to create verifiable documentation of rounds. GEO policy requires that a manual log of all rounds in Restrictive Housing Units also be maintained.

#### **ACCESS TO HEALTHCARE**

The healthcare needs of the individuals in our care are often significant. Those needs can include acute or chronic healthcare conditions, as well as emergent care needs, and/or mental health issues, including despair, anxiety, depression, fear, thoughts of self-harm and suicidal ideation.

Although GEO is typically responsible for the delivery of healthcare at our facilities as an ancillary component of our support services contracts, we are sometimes not the direct provider of health services. In some cases, our government agency partners determine who the healthcare provider will be.

GEO-provided health services are under the oversight of the GEO Healthcare Division in our Corporate Headquarters. The division is led by an Executive Vice President of Health Services and a Chief Medical Officer with four decades of experience in clinical medicine and is supported by subject matter experts in correctional healthcare, dental services, mental health services, quality control, administration and off-site health claims management.

For all facilities at which GEO provides health services, local oversight and support for healthcare is also provided through one of GEO's three Regional Offices, located in Charlotte, North Carolina; San Antonio, Texas; and Los Angeles, California. Each Regional Office has a Regional Director of Health Services, and each Regional Director is supported by up to three Regional Managers of Health Services.

GEO strives to ensure that healthcare staff, including medical, nursing, dental, and mental health professionals, are available to provide care for everyone in our facilities. Through established staffing plans, these individuals fulfill their clinical and administrative responsibilities and work synergistically with our security staff to address any health situation that may arise.

Initial screening for medical, mental health and dental care is to be completed as soon as possible after intake, and generally within twelve hours of reception at our facilities. Those who are identified as most seriously ill are then prioritized for immediate clinical evaluation and treatment as needed.

In 2020, our Secure Services Health Care Division oversaw nearly 700,000 medical encounters, including intake health screenings, physical exams, chronic care visits, off-site consultations, sick calls, dental visits, and mental health visits. Medical encounters for 2020 were lower than in 2019 due to the impact of the COVID-19 global pandemic.

### GEO SECURE SERVICES ANNUAL MEDICAL STATISTICS\*

	2020	2019
Intake Health Screenings	81,578	165,602
Physical Exams	59,124	108,346
Chronic Care Visits	89,517	98,988
Off-Site Consultations	11,960	21,641
Sick Calls	269,741	290,994
Dental Visits	55,842	88,347
Mental Health Visits	115,977	172,251

\*Data presented for facilities where GEO (or GEO's subcontractor) provides health services.

All individuals in our care have coordinated access to healthcare services, which are available 24 hours per day, 7 days per week. They are given the opportunity to submit oral or written healthcare requests at least daily, which are reviewed and prioritized by qualified healthcare professionals. All individuals in our care also have the right to refuse or question the healthcare they are receiving through an established grievance process, which

is a key component of our Quality Improvement

program.

Suicide risk assessment and prevention is an important objective of GEO's healthcare services and is driven by our Behavioral Health services Mental Health Care experts. Our suicide prevention program is clearly defined in policies and procedures and serves to eliminate and minimize the occurrence of a suicide by reducing risk and self-destructive individual behaviors.





We take our responsibility to provide prompt, comprehensive and compassionate health and mental health care to everyone in our care seriously as evidenced by our dedicated health services staff and the policies, practices, and professional guidelines we follow in our facilities, including independent standards set by the American Correctional Association, the National Commission on Correctional Health Care, and the Joint Commission.

#### **ACCESS TO LEGAL SERVICES**

### **Access to Attorney Visits / Legal Counsel**

All individuals under our care have access to attorneys through a variety of opportunities, including telephonic contact, onsite contact visits, onsite non-contact visits, onsite private visits in one of GEO's designated legal rooms or via marked legal mail. In order to protect attorney-client privilege and the confidentiality of legal material, incoming legal mail is handled as "time sensitive" and never opened and scanned by staff without the named addressee present; all outgoing legal mail is sealed by the sender and promptly placed in the mail for timely delivery.

With notice and as practical, GEO will also accommodate attorney requests to meet with their clients outside of normal hours. Despite in-person, social visitation being suspended over the course of the COVID-19 pandemic, our facilities have continued to allow attorney

visits via in-person meetings, phone calls, and videoconferencing.

Our facilities also facilitate opportunities for those under our care to access leisure and law library services and resources, including computers or kiosks containing LexisNexis legal research software.

### Access to Case Officers in Immigration Processing Centers

Immigration Processing Centers for the U.S. Department of Homeland Security (DHS) are designed and built in strict adherence with DHS Building Standards, which generally include a substantial area for onsite federal government personnel responsible for contract oversight, as well as designated case officers.

In addition to meeting face-to-face with individuals in our care on a scheduled basis, onsite case officers have a secured mailbox within each housing area whereby any resident can submit a request to meet with his or her assigned case officer outside of the regular schedule. In circumstances where an Immigration Processing Center does not have onsite case officers, regularly scheduled visits by offsite case officers are conducted.

### **Facility Handbook**

We have made it our goal to ensure all individuals in our care receive information regarding everything from intake to release, with an emphasis on how to access information requests, grievances, medical care, legal services, food services, education, telephone, visitation and recreation. GEO provides every individual in our care a facility handbook. The handbooks are printed in English and Spanish, with translation services available to those speaking other native languages.

### **Access to Translation Services/Language Line**

GEO facilities have a diverse workforce often with bilingual staff members. In our Immigration Processing Centers and other GEO Secure Services facilities, a language service line is provided to accommodate language barriers associated with both written and oral communication.

#### **Access to Free Consulate Calls**

GEO recognizes the importance for individuals in our care to communicate with consulate representatives. Our company provides free calls to consulate representatives, and a listing of consulate contacts is posted in the housing areas near the telephones. We promote this service during orientation and throughout each facility.

### Established Grievance Procedure with at Least One Level of Appeal

GEO provides a grievance process grounded in accessibility, confidentiality, fairness, objectivity, and integrity, without fear of retaliation. We provide access to grievance forms and make them available in the housing areas and libraries. A secured, locked box is available in the housing areas for placement of completed grievance forms.

Grievances are ordinarily collected daily, logged, and processed to the appropriate department staff for review and timely response. The fidelity of our process lies in having an independent, second level appeal opportunity. GEO Regional Offices or representatives from our government agency partners, depending on jurisdiction rules, review the original grievance filed along with the facility response, and render a decision to approve or deny the grievance appeal.

### ACCESS TO FAMILY/FRIENDS COMMUNICATIONS

We recognize the importance of communication in the lives of all individuals in our care, and subject to appropriate safety and security safeguards, we go to great lengths to ensure that they are able to communicate in a meaningful and timely way with their family members, friends, and legal representatives without undue time or privacy constraints.

Our housing areas are equipped with banks of telephones, most of which have attached privacy panels or full privacy enclosures. We also provide access to telephones during normal operational hours and ensure private rooms are available for those who request unmonitored legal calls in a confidential setting.

GEO provides a welcoming environment for all friends and family during social visitation. Snacks and drinks are available through fully stocked concession and vending machines. Family activities and games are also available in each facility's visitation area. Access to writing materials and postage is also available to everyone in our care.

A variety of organizations and volunteers are also on-site to provide support and connection at our facilities. Individuals may attend seminars, services, and celebrations. While these services are typically available at our facilities, on-site social visitation has been suspended over the course of the pandemic. As such, social visitation has been accommodated throughout the pandemic through phone calls and videoconferencing.

### ACCESS TO RELIGIOUS OPPORTUNITIES

We respect the right of everyone in our care to practice and follow the teachings of their faith preferences. Within GEO facilities at any given time, there are approximately 47 different faith preferences, including but not limited to Judaism, Christianity, Islam, Hinduism, Buddhism, Sikh, as well as other faith groups such as Wicca, Santeria, and Odinism.

All Chaplains at GEO facilities are professionally accredited and recognized by an ecclesiastical authority of their faith, but remain faith-neutral in the facilitation of a wide variety of services. This ensures every individual in our care feels the freedom to exercise his/her faith without fear of discrimination.

Our Chaplains recruit, train, approve, and encourage volunteers locally to teach religious educational classes, facilitate faith-neutral and faith-based life skills programming, lead religious services, mentor, and act as informal spiritual advisors. We have engaged the time, talent and commitment of over 3,100 faith-based volunteers nationwide.



### ACCESS TO SAFE AND NUTRITIOUS MEALS

### Facility Menus Approved by a Registered Dietician

The nutritional needs of the individuals in our care are diverse due to differences in age, activity, physical condition, gender, religious preference, and medical considerations. Meals, regardless of type (i.e., regular, medical, holiday or religious meals), are provided at no cost to everyone in our care.

All GEO facilities provide three nutritionally balanced meals daily with a minimum of 2,800 calories for males and 2,400 calories for females. The standard menu cycle for a GEO facility is 35 days. Menus at GEO facilities are certified by a Registered Dietitian and reviewed annually at a minimum after adoption.

Our menus also undergo a complete nutritional analysis annually to ensure they meet U.S. Recommended Daily Allowances/Dietary Reference Intake guidelines. These guidelines are set by the Food and Nutrition Board of the Institute of Medicine of the National Academies.

### Facility ServSafe Training Certifications for All Food Service Staff

GEO Food Service staff are trained in sanitation, proper food handling and storage by ServSafe, a food and beverage safety training and certification program administered by the U.S. National Restaurant Association, in addition to any locally required certifications to ensure the safety of the meals provided. GEO Food Service Managers are required to obtain the dual Instructor/Proctor ServSafe certification. GEO Food Service Managers and Production Managers also receive ServSafe Managers and Allergens certification. All other GEO Food Service staff are required to have the ServSafe Food Handlers certification.

# Health Department Inspections and Annual Facility Drinking Water Inspections

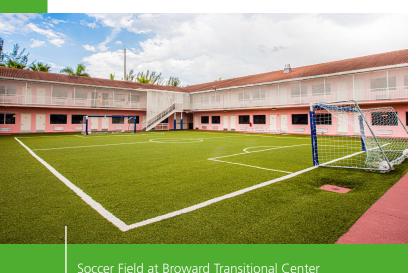
All kitchens operated by GEO, or on behalf of GEO, are required to meet or exceed all local, state, and federal guidelines pertaining to institutional food service operation. The food service areas in our facilities are frequently audited by regulatory agencies and our government agency partners. Annually, municipal water agencies provide our facilities with Consumer Confidence Reports, also known as annual drinking quality reports as required by the U.S. Environmental Protection Agency. These reports reflect the compliance of drinking and wastewater with all applicable regulations and standards.



### ACCESS TO RECREATIONAL AMENITIES

We respect the right of everyone in our care to maintain good health through participation in suitable recreational activities. Our facilities provide individuals with a variety of indoor and outdoor recreation activities. Enhanced individual and group recreation and wellness plans supplement traditional forms of recreation and allow case managers the ability to conduct continuous assessments of recreational interests and needs.

We provide gender and age responsive outdoor and indoor activities that promote life balance and recognize cultural diversity. Hobby craft programs provide opportunities to pursue artistic interests. Outdoor recreation activities include soccer on artificial turf fields, softball, basketball, and flag football. Housing units in our facilities are equipped with large, flat-screen televisions to provide entertainment.





Broward Transitional Center Sand Volleyball Court

### ACCESS TO REHABILITATION PROGRAMS FOR STATE INMATES

GEO is a world leader in the provision of enhanced rehabilitation programs and post-release support services through our award-winning GEO Continuum of Care®.

Several years ago, GEO conducted an assessment of our government agency partner objectives, organizational resources, financial strengths, and reached the conclusion that we could do more for the individuals under our care. Out of this self-assessment came the GEO Continuum of Care® enhanced rehabilitation program.

Our GEO Continuum of Care® provides enhanced in-custody rehabilitation programs including cognitive behavioral treatment, integrated with post-release support services. Our evidence-based treatment begins with individualized risks and needs assessments and offers several unique and enhanced programs, including:

- Enhanced academic programming with the use of SMARTboard technology for interactive learning in every classroom.
- Enhanced vocational training through nationally certified programs focused on future job and career opportunities.
- Industry-leading Cognitive Behavioral and Substance Abuse treatment based on nationally recognized curricula.
- Post-release support services, which involve post-release case managers and 24-hour support to assist released individuals with the most crucial community needs, including clothing, food, housing, employment, and transportation assistance.





### PROGRAMMING OPPORTUNITIES AT IMMIGRATION PROCESSING CENTERS

Although the GEO Continuum of Care® rehabilitation programs are not applicable to Immigration Processing Centers, GEO does offer programming opportunities at these locations to reduce idleness and teach life skills to the residents. The programming opportunities include:

- voluntary work programs with work skills and safety training,
- faith-based programs,
- hobby crafts, and
- correspondence programs.

### UNDERSTANDING THE FEDERAL GOVERNMENT'S VOLUNTARY WORK PROGRAM AT IMMIGRATION PROCESSING CENTERS

In recent years, various aspects of the Voluntary Work Program in effect at all Immigration Processing Centers for the U.S. Department of Homeland Security (DHS) have been subject to misinterpretation. The following facts should help address concerns expressed by some observers:

Federal government sets Voluntary Work Program standards. The federal government sets the Performance-Based National Detention Standards which govern the Voluntary Work Program at all Immigration Processing Centers, both contractor-operated and government-run.

Longstanding program. The Voluntary Work Program has been in place for decades and became part of the DHS Performance-Based National Detention Standards under President Obama's Administration. A copy of the federal government's Performance-Based National Detention Standards for the Voluntary Work Program can be found at ice.gov/doclib/detention-standards/2011/5-8.pdf.

Participation is strictly voluntary. This is stipulated in the standards set by the federal government. The Voluntary Work Program is not and has never been a program implemented unilaterally by service providers like GEO.

**U.S.** Congress guidelines set payment rates. All payment rates associated with this federal government program are stipulated under longestablished guidelines set by the United States Congress.

Voluntary Work Program objectives set by federal government. The federal government's Performance-Based National Detention Standards stipulate that the purpose of the Voluntary Work Program is to, among other objectives, "[reduce] the negative impact of confinement...through decreased idleness, improved morale and fewer disciplinary incidents."

**GEO** is required to comply with federal standards. As a service provider to the federal government, GEO is required to abide by the Performance-Based National Detention Standards, as well as all congressionally established guidelines.

**Setting the record straight.** Any allegation that individuals, in the care of the Immigration Processing Centers where we provide support services, are retaliated against or have to volunteer to work in order to have access to, or pay for, basic hygiene products or food is completely baseless and demonstrably false.

Hygiene products are provided to individuals in our Immigration Processing Centers free of charge. Additionally, three daily meals are provided free of charge, based on menus which address a variety of dietary preferences, allergies, and needs and which are reviewed and approved by a registered dietitian and the federal government in compliance with the federal government's Performance-Based National Detention Standards, as well as guidelines set by independent accreditation entities.

# PROTECTING HUMAN RIGHTS THROUGH OVERSIGHT AND CONTRACT COMPLIANCE

GEO has an independent Corporate Contract Compliance Division, which provides the overall direction and oversight of compliance for the entire company's operations and reports directly to GEO's Chief Executive Officer.

Operating as an independent monitoring team, the Division is responsible for, and committed to, implementing GEO's Quality Control Program throughout GEO's operational business units: GEO Secure Services and GEO Care.

For Immigration Processing Centers on behalf of the U.S. Department of Homeland Security (DHS), GEO has developed a comprehensive Quality Control Plan, which is reviewed and approved by the federal government for each contract location. Furthermore, in 2020, we made additional enhancements to our auditing program for Immigration Processing Centers including:

- Added a Director-level, subject matter expert to oversee and guide the auditing process at GEO's Immigration Processing Centers nationwide.
- Developed an audit team comprised of subject matter experts with DHS experience.
- Increased auditing frequency for Immigration Processing Centers from one on-site and remote review annually to four on-site reviews annually.

We provide support services at each of our facilities in compliance with governmental standards, national accreditation and certification guidelines, as well as the requirements of our government agency partners. Details of our quality control program can be found on our website at geogroup. com/exceeding-quality-compliance.

### INCLUSION OF HUMAN RIGHTS IN COMPLIANCE PROGRAM

GEO's commitment to human rights and the effective implementation of our Global Human Rights Policy is reinforced by our Quality Control Program, which identifies audit requirements, audit processes, reporting requirements, training components, and guidelines for American Correctional Association (ACA) accreditation, Prison Rape Elimination Act (PREA) compliance and certification, and, for Immigration Processing Centers, the DHS Performance-Based National Detention Standards. Each GEO facility undergoes numerous audit reviews, including an annual GEO corporate audit, government agency audits, and third-party inspections.

GEO SECURE SERVICES –				
U.S. AUDIT ACTIVITY: 2018 - 2020	2020	2019	2018	
Total Active U.S. Secure Facilities	58	67	63	
Internal GEO Contract Compliance Audits Completed*	136	124	142	
Government Customer Audits Completed	40	41	69	
Third-party Inspections Completed	33	19	47	

\*Includes: Annual Corporate Audits, Follow-up Audits, PREA Mock Audits, ACA Mock Audits, ACA Readiness Assessments, Ad Hoc Audits, Medical and Operations only audits

## GEO'S CONTRACT COMPLIANCE AUDIT PROCESS: CONSTANT MONITORING AND CONTINUOUS IMPROVEMENT

GEO audits cover a one-year period between the last and the current audit dates. Internal audits are conducted by facility staff at a predetermined frequency. Follow-up audits – which are completed by our Contract Compliance Division – focus on non-compliant findings and advised items from the prior year's corporate audit, internal facility audits, and any government agency findings. Furthermore, our Contract Compliance Division conducts ad hoc audits when needed to address any findings identified in intervening government audits, and/or internal audits.

GEO's Contract Compliance audit tools are used to review every aspect of a facility's support services, including facility safety, staff training, and other key factors. Human rights related questions are answered in several categories during each facility's annual corporate audit.

### GEO REMEDIES TO SHORTCOMINGS IN HUMAN RIGHTS PERFORMANCE

During an audit, all non-compliant findings, observations, and impressions are captured and placed into GEO's compliance database. A post-audit workshop is conducted at the conclusion of every annual corporate audit to ensure non-compliant findings are well understood and positioned for immediate corrective action. Corrective action plans focus on how each area of non-compliance can be remedied. Each corrective action plan is assigned to a specific department at the facility to ensure accountability.

### INDEPENDENT VERIFICATION OF GEO PERFORMANCE

In addition to our comprehensive quality control program auditing of human rights, all of our government agency partners take an active role in the oversight and auditing of our physical plants and service provisions. They include:

#### **State Facilities**

Our state government agency partners have monitors assigned to each facility, to oversee daily operations and the quality of services delivered. Most states conduct at least one comprehensive annual audit.

GEO AUDIT CATEGORY	Human Rights Related Questions
Food Service	114
Physical Plant	246
PREA	132
Admission, Orientation	123
Law Library/Courts	85
Mail/Visitation/Telephone	192
Library	12
Discipline	130
Work Programs	72
Religious Programs	75
Substance Abuse Program	40
Sanitation	127
Safety	155
Emergency Preparedness	61
Accountability	46
Restricted Housing Units (RHU)	98
Searches/Security Inspection	35
Use of Force	41
Health Services	450
Recreation Programs	70
TOTAL	2,304

## Immigration Processing Centers for the U.S. Department of Homeland Security (DHS)

Immigration Processing Centers have full-time, on-site contract compliance monitors. DHS also has a structured Quality Assurance Surveillance Plan, including audits. DHS Performance-Based National Detention Standards, which ensure consistency with federal legal and regulatory requirements, can be found on the agency's website at ice.gov/detention-standards/2011.

### U.S Department of Homeland Security (DHS)

Representatives from the DHS Office for Civil Rights and Civil Liberties and the DHS Office of the Inspector General conduct audits and reviews at Immigration Processing Centers.

#### **United States Marshals Service (USMS)**

USMS conducts an annual Quality Assurance Review (QAR) at facilities with federal inmates under their jurisdiction. The QAR evaluates performance on all aspects of services utilizing the federal Performance-Based Detention Standards.

#### **Federal Bureau of Prisons (BOP)**

BOP has full-time onsite monitors to oversee daily operations and contract service provisions. Compliance with the BOP's "Program Statements" is a critical part of GEO's auditing process.

#### OTHER AGENCIES AND ORGANIZATIONS

In addition to contract oversight by each government agency partner, our facilities are subject to audits by both federal agencies and independent, third-party organizations, including DHS (as described above), and the Department of Justice Office of Inspector General (DOJ-OIG), which conducts audits at both USMS and BOP facilities.









# MEETING STANDARDS AT PROCESSING CENTERS FOR THE U.S. DEPARTMENT OF HOMELAND SECURITY

All of GEO's Immigration Processing Centers operate in accordance with the DHS Performance-Based National Detention Standards (inclusive of any applicable waivers) and are audited and inspected by the agency on a routine and unannounced basis. Also, each facility is reviewed by independent accreditation entities, including the American Correctional Association (ACA) and the National Commission on Correctional Health Care (NCCHC).



### GEO'S CONTRACT COMPLIANCE AUDIT PROCESS

GEO's Quality Control Program includes field and remote audits, the development and implementation of corrective action plans, accreditation preparation, and verification activity. Designed to prevent errors, identify gaps in operational excellence, and mitigate performance deficiencies, the program involves the following:

### **Two-part Compliance Process**

Part one is an external audit led by the Contract Compliance Division staff and field-based subject matter experts. The second part involves an internal audit conducted by each facility's dedicated compliance administrator or program director.

#### **Consistent Content**

Both types of audits include questions from GEO policies and procedures, contract requirements, applicable third-party accreditation standards, and government audit findings. The audits cover every question GEO's government agency partners use in their own individual audit activities.

### **Analytics and Reporting**

Both sets of audit results (internal and external) are entered in the Contract Compliance database, analyzed, and shared with all levels of GEO's management to identify trends and potential opportunities for improvement.

#### **Continuous Improvement**

Atyear-end, all applicable Contract Compliance audit tools are evaluated for continued adherence with the necessary requirements. Audit results are used to develop effective corrective actions, where needed, and to inform daily monitoring practices to ensure thorough and sustained compliance.

### **Specialized Medical and Health Care Assessments**

A dedicated health care team within the Contract Compliance Division audits all aspects of health care treatment provided at GEO Secure Services facilities and applicable GEO Reentry facilities in the U.S.

### THIRD-PARTY ACCREDITATION ENTITIES

As a matter of policy, all GEO facilities are designed and operated in accordance with the guidelines of several organizations or protocols, including:

#### **ACA Accreditation**

We are committed to achieving ACA accreditation at all GEO Secure Services facilities and all applicable GEO Reentry facilities. As of 2020, 69 GEO facilities have achieved an average ACA accreditation score of 99.71%. ACA accreditation scores for individual GEO facilities can be found on GEO's website at geogroup.com/industry-leading-standards.

#### **PREA Compliance and Certification**

GEO mandates zero tolerance towards all forms of sexual abuse and sexual harassment in our facilities and has a rigorous compliance process for facilities that fall within the scope of the Prison Rape Elimination Act of 2003 (PREA). Currently, GEO has 91 facilities certified under either the DOJ or DHS PREA regulations. Additional information on GEO's PREA policy and compliance process is available on our website at geogroup.com/PREA.

#### **NCCHC Accreditation**

Beyond complying with ACA healthcare standards, many GEO facilities also obtain NCCHC accreditation based on requirements set by our government agency partners. Currently, 16 GEO Secure Services facilities are accredited by the NCCHC, including the ten Immigration Processing Centers on behalf of the U.S. Department of Homeland Security (DHS), for which GEO provides health care services.

#### The Joint Commission Accreditation

For those GEO facilities that house Federal inmates on behalf of the BOP, GEO obtains healthcare accreditation under The Joint Commission. An independent, non-profit organization, The Joint Commission conducts audits of correctional facilities every three years.

## U.S. Establishment, Promulgation and Evaluation of Human Rights Compliance for Civil Immigration Detainees and State Inmates

# Establishment of Human Rights

#### **United States**

- U.S. Constitution
- U.S. Court rulings
- Federal/State Laws and Regulations

#### **International**

- International Convention on Human Rights
- U.N. Convention on Treatment of Prisoners

## Promulgation of Human Rights

### **State Inmates**

 State Correctional Polices and Standards

### **DHS Civil Immigration Detainees**

 Performance Based National Detention Standards

# Evaluation of Human Rights Compliance

### State Inmates and DHS Civil Immigration Detainees

- Govenment on-site monitors
- Periodic govenment agency audits
- Periodic third-party contractor audits
- Evaluation by the American Correctional Association (ACA)
- Audits by the National Commission on Correctional Health Care (NCCHC)

GEO Contract Compliance/Quality Control Monitoring			
	On-site Government Agency Monitors provide daily reviews		
Daily	<ul> <li>On-site GEO Contract Compliance Monitors for Immigration Processing Centers provide daily reviews</li> </ul>		
Monthly	On-site GEO Contract Compliance Monitors for Immigration Processing Centers perform Quality Control audits		
•	<ul> <li>On-site GEO Operations Monitors for Secure Services Facilities perform Quality Control audits</li> </ul>		
Quarterly	<ul> <li>On-site GEO Operations Monitors for Secure Services Facilities perform Health Services audits</li> </ul>		
	GEO Corporate Contract Compliance Monitors for Immigration Processing Centers perform facility audits		
	GEO Corporate Contract Compliance Monitors perform annual audits in line with GEO's Quality Control Program		
Annually	<ul> <li>Government Agency Partner Headquarters Monitors perform standard annual facility audits</li> </ul>		
Tri-Annually	American Correctional Association (ACA) and Prison Rape Elimination Act (PREA) audits are performed every three years		
	The Joint Commission and the National Commission on Correctional Health Care audits are performed every three years		

HUMAN RIGHTS RELATED AUDIT QUESTIONS				
GEO AUDIT CATEGORY	Human Rights Related Questions	GEO AUDIT CATEGORY	Human Rights Related Questions	
Food Service	114	Substance Abuse Program	40	
Physical Plant	246	Sanitation	127	
PREA	132	Safety	155	
Admission/Orientation	123	Emergency Preparedness	61	
Law Library/Courts	85	Accountability	46	
Mail/Visitation/Telephone	192	Restricted Housing Units (RHU)	98	
Library	12	Searches/Security Inspection	35	
Discipline	130	Use of Force	41	
Work Programs	72	Health Services	450	
Religious Programs	75	Recreation Programs	70	
Total Human Rights Related Audit Questions: 2,304				

### **ENVIRONMENTALLY RESPONSIBLE**

GEO is committed to creating sustainable environments in our facilities throughout the U.S. and worldwide. GEO will strive to procure renewable energy as the availability of sources of renewable energy increases over time.

### ENVIRONMENTAL SUSTAINABILITY POLICY STATEMENT

As a company specializing in public-private the financing, partnerships for desian. development, and delivery of support services for secure facilities, processing centers, and community reentry centers worldwide, and we work to promote our growth and services in a sustainable and responsible manner. We are committed to delivering our services in a manner that contributes to positive economic, social and environmental outcomes for the individuals in our care, our employees, government agency partners, and shareholders, as well as the communities we serve.

Mindful of energy, water, and waste management, we have adopted an integrated approach focusing on environmental protection and awareness, waste and energy reduction, and risks and opportunities related to climate change. We are committed to maintaining the environment and reducing the footprint of our business operations by:

- Identifying, measuring, and offsetting the environmental footprint of our global operations;
- Reducing our environmental impact through local operations initiatives;
- Preventing pollution by conserving energy and resources, recycling, minimizing waste and pursuing other resource reduction strategies;
- Maintaining full compliance with applicable environmental laws, regulations, and company policies and procedures; and
- Working with our stakeholders on activities that promote environmental protection and stewardship.

Using our environmental management system, which monitors our energy and water usage, as well as waste and carbon emissions, we are pursuing a sustainable and environmentally sound future. We are committed to creating sustainable environments in our facilities worldwide, and we believe that our adoption of a greener operational philosophy lowers operating costs and emissions to the benefit of all. We regularly strive to identify sustainable initiatives and innovations that deliver energy and natural resource efficiency across new and existing facilities we own and manage. For more information on GEO's environmental sustainability policy statement, please visit geogroup.com/Environmental-Policy.

### **ENVIRONMENTAL MANAGEMENT SYSTEM** (EMS)

For several years, we have been monitoring our facilities' utility operating costs monthly, including electricity, natural gas, water usage, waste disposal, and carbon emissions to encourage each facility to focus on conservation measures and enhance environmental sustainability efforts. The systems we have developed allow us to identify and prioritize the most impactful energy, water, and emissions reduction activities.

In 2017, we issued our first internal utility sustainability report, ranking leading and trailing facilities throughout our company in terms of electricity, gas and water usage, and solid waste generation. The report also provided instructions and strategies to staff for reducing the consumption of energy and water resources, and addressed waste production. As individual GEO facilities adopt a green operational philosophy, the facilities are better able to manage energy consumption, reduce emissions, and lower operating costs.



Bi-Polar Ionization units being installed at the Mesa Verde Processing Center

# IMPACT OF COVID-19 PANDEMIC ON SUSTAINABILITY INITIATIVES

Due to the COVID-19 pandemic, several sustainability initiatives at select GEO Secure Services facilities, focused on LED lighting upgrades and water conservation, that were scheduled to be completed in 2020 were postponed. These LED lighting and water conservation upgrades total approximately \$10 million and are expected to be completed between 2021 and 2022.

Despite these challenges, as part of our COVID-19 mitigation efforts, we invested \$3.7 million to install Bi-Polar Ionization Air Purification Systems at select U.S. Secure Services facilities to reduce the spread of airborne bacteria and viruses. Bi-Polar Ionization Air Purification Systems are specially designed electronic devices that create bi-polar - negative and positive - ions that can effectively break down a wide variety of harmful bacterial and viral contaminations into a less complex and safe form by attacking the DNA of bacteria and viruses.

Additional details regarding GEO's environmental activities, including at our BI Incorporated division, LEED certifications, and more examples of energy conservation activities are available on our website at: https://www.geogroup.com/Sustainability.



GEO GROUP ENVIRONMENTAL PERFORMANCE METRICS						
Energy Consumption	2020	2019	Unit			
Total Energy Usage	2,112,078	2,560,998	GJ**			
Electricity	1,096,873	1,284,232	GJ**			
Natural Gas	902,713	1,183,941	GJ**			
Diesel	26,000	26,500	GJ**			
Fuel Oil	36,398	35,948	GJ**			
Propane	50,093	30,377	GJ**			
<b>Energy Intensity Unit</b>	0.11	0.12	energy/sq ft			
Water Consumption						
Water Usage***	1,654,153,197	2,172,718,367	gallons			
Greenhouse Gas Emissions						
Scope 1 Emissions	55,095	68,516	tCO2e			
Scope 2 Emissions*	132,591	166,886	tCO2e			
Scope 1 Intensity	0.0029	0.0033	tCO2e/sq ft			
Scope 2 Intensity	0.0069	0.0081	tCO2e/sq ft			

<sup>\*</sup> Location based

# ASSESSING GEO'S ENVIRONMENTAL PERFORMANCE

In 2020, GEO undertook the initiative of determining our carbon footprint, including greenhouse gas (GHG) emissions and energy consumption data. We gathered data from each facility regarding energy use, including natural gas, diesel, fuel, propane, and electricity, and water use, as well as Scope 1 and Scope 2 emissions, and for the first time, we have also disclosed Scope 1 and Scope 2 intensity ratios.

The initiative also helped gauge the types of recycling programs GEO's facilities have implemented on a local level. While most of our facilities typically have recycling programs focused on wastepaper and cardboard, plastic, glass, wood, and organic waste, a number of our facilities are also engaged in recycling programs for aluminum, metals, electronics and batteries.

The data presented for GEO's 2020 Environmental Performance Metrics shows the company's total

<sup>\*\*</sup> In 2020, all energy consumption data has been coverted to gigajoules (GJ) for consistency

<sup>\*\*\*2019</sup> water data has been updated for comparability purposes and excludes two facilities

#### 2020 GEO GROUP ENVIROMENTAL PERFORMANCE METRICS BY SEGMENT

	GEO SECURE SERVICES FACILITIES (U.S. + INTERNATIONAL)	GEO CARE FACILITIES (YOUTH + RESIDENTIAL REENTRY)	CORPORATE AND REGIONAL/DIVISIONAL OFFICES	UNIT
Energy Consumption				
Total Energy Usage	1,801,195	272,652	38,231	GJ**
Electricity	964,260	111,416	21,197	GJ**
Natural Gas	742,821	143,474	16,418	GJ**
Diesel	23,053	2,332	616	GJ**
Fuel Oil	27,695	8,703	0.00	GJ**
Propane	43,366	6,727	0.00	GJ**
Energy Intensity Unit	0.11	0.12	0.09	energy/sq ft
Water Consumption				
Water Usage	1,510,000,658	141,671,651	12,812,743	gallons
Greenhouse Gas Emissions				
Scope 1 Emissions	45,769	8,349	977	tCO2e
Scope 2 Emissions*	117,059	12,716	2,816	tCO2e
Scope 1 Intensity	0.0028	0.0038	0.0022	tCO2e/sq ft
Scope 2 Intensity	0.0070	0.0058	0.0065	tCO2e/sq ft

<sup>\*</sup> Location based

energy and water consumption for the year and then breaks that data down into three segments:

- GEO Secure Services Facilities (U.S. + International)
- GEO Care Facilities (Youth + Residential Reentry)
- Corporate and Regional/Divisional Offices

Our baseline year is 2019 and the GHG Protocol Corporate Accounting and Reporting Standard was used in the calculation of energy use and GHG emissions. Electricity emission factors are obtained from the International Energy Agency's CO2 Emissions from Fuel Combustion 2020

report, and the U.S. Environmental Protection Agency's Emissions & Generation Resource Integrated Database (eGRID) publication. All energy sources are included in intensity calculations. Gases covered in GHG emissions calculations include CO2, CH4, N2O, and HFCs. Global warming potentials are obtained from the Intergovernmental Panel on Climate Change (IPCC) Fifth Assessment Report. The chosen consolidation approach for emissions is facilities under GEO operational control. GEO has no emissions from biogenic sources. The data shows reporting of a location-based Scope 2 emissions figure.

<sup>\*\*</sup> In 2020, all energy consumption data has been coverted to gigajoules (GJ) for consistency

## **ENSURING SAFETY AND SECURITY**



In 2020, GEO provided support services for 118 secure facilities, processing centers, and community reentry facilities, as well as 77 non-residential reentry programs. We employed approximately 22,000 employees.

GEO has a firm commitment to the health and safety of our employees and those in our care, as well as contractors, medical providers and visitors at all our facilities. Our responsibilities in these areas, along with those of our employees, are highlighted in Section 7 of GEO's Code of Business Conduct and Ethics, which is available on our website at geogroup.com/Code-of-Conduct.pdf.

#### **GEO'S EHS MANAGEMENT SYSTEM**

Throughout our operations, GEO has implemented an Environmental Health and Safety (EHS) Management System that is grounded in Integrated Safety Management. Our health and safety management system and practices apply to all GEO employees and contractors. Through the EHS, we have established objective, quantifiable targets and extensive feedback and reporting mechanisms to achieve continuous improvement in our health and safety performance.

The overall management of GEO's EHS program is led by GEO's Corporate Risk Management department, which is comprised of a group of professionals with expertise in occupational safety, workers' compensation and insurance, risk analytics, and environmental issues. Regional Safety Managers are embedded into our operations throughout the United States and provide handson, field support for our facilities.

All facilities in the U.S. Secure Services Division also employ a dedicated Fire & Safety Manager responsible for managing the EHS program at the local level. Fire & Safety Managers are formally trained in multiple EHS disciplines, including the Occupational Safety and Health Administration (OSHA), and National Fire Protection Association (NFPA), along with company and customer required practices.

# In addition to organizational and management structure, the following elements are critical to GEO's ongoing EHS program:

**Operational Excellence:** Our organization strives to achieve sustained, effective levels of operational performance. This involves a focus on operations, decision-making, open communication, and systematic approaches to reduce and eliminate the chance of events or situations that may jeopardize the safety and health of employees and/or those in our care.

Individual Responsibility for Workplace Safety: Every employee at GEO accepts the responsibility for safe operational performance and is trained to be mindful of work conditions that may have an impact on safety.

**Compliance Oversight:** Competent, robust, periodic, and independent oversight is an essential source of feedback that can be used to verify safety performance expectations are met and to identify EHS gaps and opportunities for improvement.

Communication and staff engagement: There are multiple formal and informal channels for communication to and from staff regarding the discovery and mitigation of potential hazards and corrective actions that involve all aspects of workplace safety. We also encourage individuals in our care to be active participants in each facility's safety program by reporting any issues that may give rise to hazards or injury.

Safety committees are active at each of our facilities and play an integral role in assisting the Fire & Safety Managers and facility management teams, in reducing injuries and hazards associated with facility operations.

# SAFETY MEASURES IMPLEMENTED FOR COVID-19

From the beginning of the global COVID-19 pandemic, GEO's corporate, regional, and field staff have taken steps to mitigate the risks of the novel coronavirus and have worked with our government agency partners to implement best practices consistent with the guidance issued by the Centers for Disease Control and Prevention. Details of GEO's COVID-19 response and mitigation measures are available on our website at geogroup.com/COVID19.

# ONGOING EMPLOYEE TRAINING HELPS DRIVE SAFE PRACTICES

As described in other sections of the ESG Report as well as on our website, GEO provides a robust training program for staff at all levels. In addition to position-specific training, employees also receive training specifically related to GEO's Human Rights Policy and facility workplace safety.

Our training of managerial, administrative, and security staff is based on standards set by the American Correctional Association (ACA). GEO's corporate policy mandates that every new employee receive orientation training prior to undertaking any assignments. On an annual basis, GEO's Vice President of Staff Development and Emergency Preparedness reviews and revises the Master Training Plan to better accommodate employee needs.



## **ENGAGING WITH OUR STAKEHOLDERS**

GEO's stakeholders include our employees and board members, government agency partners, regulators, accrediting organizations, faith-based organizations and NGOs, the individuals in our care, unions and labor organizations, communities where we operate, and investors and creditors.

Through regular meetings and discussions, webcasts and conference calls, as well as a steady flow of information provided in our reports, newsletters, and posted on our website, we strive to educate our stakeholders on our operations, governance practices, the regulatory environment in which we operate, and our overall commitment to corporate social responsibility, sustainability, and respecting the human rights of all those in our care.

At the same time, we have been active participants in ongoing dialogues with many of our stakeholders and carefully consider their input and feedback as being critical to our focus on achieving operational excellence, having a positive impact on individuals and our society, and meeting the standards for excellence in corporate citizenship.

An area of emphasis for GEO involves working with key stakeholders to help the company understand different perspectives on human rights topics in our U.S. secure services facilities, processing centers and community reentry programs, and to learn how GEO can improve its services to fulfill the commitments outlined in our Global Human Rights Policy.



#### FAITH-BASED ORGANIZATIONS

As part of our collaboration with key stakeholders, GEO partners with approximately 47 faith-based organizations around the country, including national organizations and local community churches. These organizations offer a wide range of religious and educational services, as well as guidance and mentorship, to those in our care.

We have also partnered with the Global Leadership Summit, an annual two-day event telecast held every August. The summit is telecast to hundreds of locations in North America and brings together pioneering pastors and leaders from around the world who lecture about leadership, skill development and experiences that help local churches thrive.



#### Faith-Based Partnership with Crossroads Church and the University of the Southwest

The "seminary" program with University of the Southwest (USW) at the Lea County Correctional Facility (LCCF) in Hobbs, New Mexico continued to grow in 2020, despite the challenges of the COVID-19 pandemic. Through diligent efforts between GEO and USW, all courses were safely and effectively delivered for the 2020-2021 academic year.

On July 16, 2020, the seminary program held a commencement ceremony recognizing the accomplishments of 18 inmates who completed the first two years of the program. In 2020, the USW began receiving funding through the Second Chance Pell grant program, allowing it to offer additional courses leading to either a Bachelor's of Arts in Community Leadership & Social Engagement or a Bachelor's of Business Administration in Management.

"Moving forward with this new funding from the Second Chance Pell grant, USW will enroll 20 new inmate students for its 7th cohort and will continue training the 11 students in its 6th cohort."

Danny Kirkpatrick, Ph.D.

Dean of the College of Arts and Sciences Associate Professor of Christian Studies Program Coordinator for Christian Studies Director of the Prison Seminary



#### **Alpha USA Faith-Based Partnership**

Alpha USA is a subdivision of Alpha International, which supports churches of all major denominations within their ministry with training, technical support, and courses. Alpha International is currently operating in over 160 countries and in approximately 6,000 churches in the U.S. Prior to the COVID-19 pandemic, Alpha was providing religious services and support to approximately 630 criminal justice facilities across the country.

"Over the years, Alpha USA and GEO have developed a flourishing partnership in our joint mission to equip offenders with programs and services which will increase their opportunities for successful transition back into their communities. These programs and services include curriculum, mentors, and community resources, as well as peer mentoring training. We look forward to working with GEO on expanding the partnership to more facilities and communities."

Jack Cowley National Director Alpha USA

#### THE GEO GROUP FOUNDATION

The GEO Group is committed to making a difference in the communities in which we operate. Every year, through The GEO Group Foundation, GEO supports charities, schools, community organizations, and higher education scholarships for students across the country.

Since 2011, The GEO Group Foundation has donated approximately \$17 million to scholarships, children's organizations, health and disability organizations, youth sports and development, veterans' organizations, and various other charitable organizations in the communities where we operate.

in Student Scholarships Since 2011

Overall, GEO donates more than 1% of net profits to charitable causes and community projects addressing local needs. Additional information on The GEO Group Foundation, including its annual reports, can be found at <a href="mailto:geogroup.com/">geogroup.com/</a> Foundation.



# GEO FOUNDATION ANNUAL CHARITABLE GIVING (2020-2018)

	2020 2019		2018
Scholarships	\$717,500	\$716,000	\$709,000
Health & Disabilities	\$432,400	\$583,720	\$444,620
Children's Organizations	\$158,280	\$319,395	\$175,002
Local Schools & Education	\$74,894	\$135,403	\$107,720
Other	\$427,800	\$682,049	\$470,300
TOTAL DONATIONS	\$1,810,874	\$2,436,567	\$1,906,642

#### **COMMUNITY ENGAGEMENT**

In addition to charitable giving, GEO's facilities play an active role in giving back to their communities and their employees. We take great pride in the opportunities we make available to members of those communities, as well as our efforts to be a good community partner and responsible corporate citizen.

Our facilities generally hold quarterly Community Advisory Board meetings. Most of these boards include community leaders and key GEO facility staff. The meetings provide a forum for sharing information on current events at GEO facilities, as well as to discuss the needs of the local communities. These engagements help identify partnership opportunities between our facilities and local organizations and help build community trust and relationships.



# ENGAGING AND MONITORING OUR SUPPLIERS

GEO works with numerous vendors and suppliers of services and goods and requires compliance with appliable laws. GEO also monitors our suppliers for anti-corruption practices. We expect suppliers to maintain the same standards as GEO has laid out in our Code of Business Conduct and Ethics.

Through the years, we have strived to establish and build upon relationships with numerous small, disadvantaged, woman-owned, and veteran-owned vendors across our U.S. operations. In 2020, the total value of our contracts with women-owned businesses was approximately \$47 million, while those with small disadvantaged businesses totaled nearly \$29 million. Our payments to veteran-owned business totaled more than \$10 million, and our contracts with businesses owned by disabled veterans totaled over \$5 million.

GEO takes our responsibilities seriously and has formal due diligence processes to screen and monitor third parties, suppliers, and agents.

# SMALL AND DIVERSE VENDOR BREAKOUT:

	2020	2019	2018
Woman Owned Businesses	\$46,795,774	\$47,655,002	\$36,483,810
Small Disadvantaged Businesses	\$28,978,174	\$31,102,153	\$34,006,569
Veteran Owned Businesses	\$10,433,360	\$12,876,204	\$11,187,155
Service Disabled Veteran Owned Businesses	\$5,014,925	\$6,737,969	\$5,282,609

# GEO CONTINUUM OF CARE: REHABILITATOR OF LIVES

The GEO Continuum of Care® – an innovative and award-winning initiative we began in 2015 – provides enhanced in-custody rehabilitation programming, including cognitive behavioral treatment, integrated with post-release support services. This evidence-based treatment model begins with individualized risks and needs assessments and offers programs designed to address the specific needs of each participant based on their assessments.

In addition, GEO's Reentry Services division supports correctional agencies across the country with flexible options, such as in-custody treatment, residential reentry centers, and day reporting programs. Throughout the U.S., individuals released from correctional facilities can continue their course of treatment at GEO's residential facilities or non-residential day reporting centers to maximize the impact of programs delivered to reduce recidivism. GEO's residential reentry centers offer individuals a safe, structured environment, as well as employment counseling, job placement, financial management assistance, and other programs and services.

GEO's day reporting centers provide on-site cognitive-behavioral treatment and rehabilitation services tailored to participants' specific criminogenic risks and needs. Participants receive a continuation of their care, including treatment focused on changing behavior. At the same time, they are connected with community resources and organizations to enable them to reintegrate to their local community.

On a combined basis, the GEO Continuum of Care® division and GEO's Reentry Services division provide meaningful programming including behavioral therapies, academic skills development and remedial education, vocational training and certification programs, cognitive-behavioral and substance abuse treatment, and faith-based support services.

Despite the significant challenges associated with the COVID-19 global pandemic, our GEO Continuum of Care® staff continued to deliver enhanced rehabilitation to those in our care during 2020, often in innovative ways through virtual technologies.

GEO publishes annual reports on the results of the GEO Continuum of Care® program. The 2020 GEO Continuum of Care Annual Report can be accessed on our website at <a href="mailto:geogroup.com/coc-Annual-Report-2020">geogroup.com/coc-Annual-Report-2020</a>.



## 2018-2020 GEO CONTINUUM OF CARE (COC) HIGHLIGHTS

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POPULATION	2020	2019	2018
Total Eligible Population	37,774	69,548	64,620
Total Program Participants	20,294	33,309	31,049



#### **PARTICIPATION**

Total Programming Hours Completed	2,564,275	6,789,417	6,733,045
<b>Total Programming Completions</b>	83,521	51,605	44,518
Behavioral Program Completions	34,606	44,715	32,419
Individual Cognitive Behavioral Treatment Sessions Completed	31,260	36,539	16,409
Average Daily Vocational Attendance	4,074	33,033	32,283
Average Daily Academics Attendance	1,395	13,244	13,104
Average Daily Substance Abuse Attendance	8,212	18,038	17,965
Total Substance Abuse Completions	8,767	8,767	8,842
Total Vocational Completions	7,649	9,413	9,131
Total High School Equivalencies Issued	1,239	2,882	2,779
Average Program Participation Hours per Participant	126	204	216.8



#### **POST-RELEASE SUPPORT SERVICES**

#### **SUMMARY**

Total Post-Release Participants	3,656	4,317	1,864
Community-Based Participants	5,343	3,840	631
Participants Pending Release	1,687	477	749
Employed/Students	1,320	1,638	900



#### **STAFF DEVELOPMENT**

Total Annual Trainings	7,362	342	334
Total Staff Training Hours	206,136	82,080	80,170



# IN-CUSTODY REHABILITATION PROGRAMS: FACILITATING SUCCESSFUL TRANSITIONS BACK TO THE COMMUNITY

GEO's in-custody rehabilitation programs are tailored to the specific needs of each individual. They include:

- individual and group behavioral therapy activities;
- academic and remedial education;
- vocational skills training;
- substance abuse treatment; and
- a variety of faith-based services and support programs offered in conjunction with partner religious organizations.

We believe the GEO Continuum of Care® program demonstrates that inmates working with an assigned transition case manager while in custody – within a year prior to their release – and then receiving assistance from a post release case manager, can achieve a reduction in recidivism.

# EDUCATIONAL DEVELOPMENT AND ENRICHMENT

At our GEO Continuum of Care® sites, individuals participate in an educational needs and opportunities assessment from which individually tailored education plans are designed and implemented based on learning style and needs. Progress is monitored continually, and each plan is re-evaluated every 30 days.

To address the specialized and diverse educational needs of those in our care, GEO developed adult learning labs, which offer a combination of individual learning opportunities and technology-driven group interaction. Participants develop collaborative skills by working in teams at SMART Board stations to investigate, assess and respond to issues.

Since 2014, GEO has invested approximately \$1.6 million to equip more than 800 classrooms across our facilities with SMARTboard Technology and added nearly 590 computer stations.

We believe GEO's learning model, which was developed in 2015, proved its effectiveness in 2020 as COVID-19 escalated into a global pandemic. While education systems all over the world closed their doors, correctional education was not immune to these challenges, and GEO pushed forward with the development of GEO Academy.

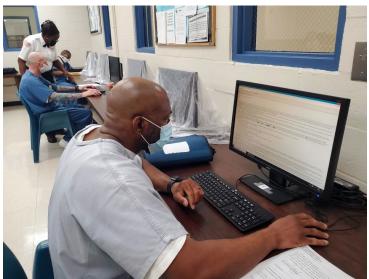
GEO Academy is an online library of resources for educators and students at GEO facilities. The use of technology generated new learning opportunities, where students could be effective and collaborative creators, demonstrate competencies, and communicate ideas through digital media. The classroom computers and tablets allowed for social distanced lessons, while providing engaging learning paths.

#### **POST-SECONDARY EDUCATION**

Through a partnership with Ashland University, individuals can transition into full-time college students. In 2020, GEO students at Graceville Correctional and Rehabilitation Facility in Florida and Riverbend Correctional and Rehabilitation Facility in Georgia completed 1,566 credit hours towards their degrees through Ashland University.

Ashland University offers a full menu of degree options at no cost to the student. GEO students enrolled in Ashland are seeking degrees in the following areas:

- Associate of Arts in General Studies
- Associate of Arts in Business
- Associate of Arts in General Studies with a Concentration in Business
- Bachelor of Arts in Communication Studies
- Bachelor of Science in Interdisciplinary Studies
- Business Management Minor
- Business Administration Minor
- Sociology Minor
- Religion Minor



#### **VOCATIONAL TRAINING**

Along with academic skills development, GEO provides a growing number of vocational training and certification programs. Many of these programs focus on high-growth industries or involve skillsets that are in demand in communities where individuals will reside upon release. At present, the training programs we offer encompass 102 different vocational fields.

In light of the COVID-19 pandemic in 2020, participants continued to earn occupational completion points through technology-based platforms and independent study. Vocational programming was adapted for virtual platforms and independent study materials were developed to meet social distancing requirements.

In 2020, we also launched GEO Academy Career Services through partnerships with community employers. The goal of this program is to create pre-release programming opportunities, designed to increase post-release employment.





#### FACILITATING TRANSITION: GEO'S POST-RELEASE SUPPORT SERVICES

Approximately 95 percent of all individuals released from prison return to their communities. GEO's Post-Release Support Services provide case management, develop and maintain community partnerships, and coordinate and distribute transitional resources based on individual need

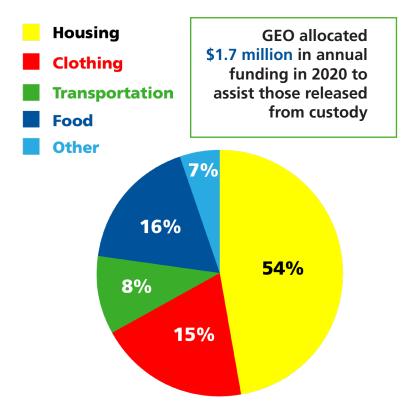
These measures are aimed at reducing recidivism rates, as well as increasing public safety, reducing victimization, and improving the quality of life for released individuals upon returning to their communities.

# **GEO's Post-Release Support Services** include providing assistance for:

- Transitional housing
- Substance Abuse and Mental Health Treatment
- Vocational Training
- Transportation Assistance
- Family Reunification Opportunities
- Educational Classes
- Clothing and Food Vouchers
- Job Placement Assistance

As an extension of the GEO Continuum of Care®, GEO's Post-Release Case Managers coordinate and facilitate the delivery of resources through 229 preferred providers. Weekly calls are scheduled with post-release participants to assess progress, provide support for up to 12 months, and motivate participants to continue in the behavioral change process.

In addition to extended case management, education, training, and related services, GEO allocated \$1.7 million in company funding during 2020 to assist those released from custody in obtaining such necessities as: housing (54%); clothing (15%); transportation (8%); food (16%); and other items or services (7%).





#### DRUG AND ALCOHOL TREATMENT

A critical element of GEO's services – both for individuals in our care and those involved in our post-release programs – involves the treatment of substance abuse, including alcoholism and opioid addiction.

Individuals with drug and alcohol addiction problems are provided with substance abuse treatment programs, including counseling, monitoring, and drug testing. Individuals may be referred to these programs based on their court commitment papers, by individual request, or based on an assessment by GEO's classification and counseling staff.

#### **CARF ACCREDITATION**

In August 2020, our GEO Continuum of Care® programs in Florida achieved a three-year accreditation from CARF International, an independent

International, an independent accrediting organization focused on promoting the quality, value, and optimal outcomes of rehabilitation programs.



This accomplishment represents the highest level of accreditation that can be given to an organization in the area of in-custody rehabilitation. This important recognition is a testament to our company's leadership in delivering enhanced in-custody rehabilitation programs and post-release support services through our award-winning GEO Continuum of Care®.

GEO's CARF Accreditation applies to the following programs and services:

- Intensive Outpatient Treatment: Alcohol and Other Drugs/Addictions
- Outpatient Treatment: Alcohol and Other Drugs/Addictions
- Prevention: Alcohol and Other Drugs/ Addictions

"This achievement is an indication of your organization's dedication and commitment to improving the quality of the lives of the persons served. Services, personnel, and documentation clearly indicate an established pattern of conformance to standards." — Brian J. Boon, Ph.D., President & CEO of CARF International

#### **FAITH-BASED INITIATIVES**

In 2020, faith- and character-based services utilized technology to continue to provide quality programming. Chaplains provided a variety of media resources, concerts, sermons, and lectures through a constant stream of digital, live, and directed study courses.

Six new partnerships with faith groups enabled GEO to provide religious correspondence courses and spiritual direction to over 300 participants across the country.

In partnership with the Florida Atlantic University Civics Education Project and Certell Inc., a leading digital educational content provider, GEO offered a hybrid teaching platform, enabling classes to continue during the COVID-19 pandemic through tablets. In 2020, 65 participants at the South Bay Correctional and Rehabilitation Facility in Florida graduated from the program.

Through partnerships with University of the South West (USW) and Crossroads Church in Texas, students at Lea County Correctional Facility in New Mexico were able to continue their theological training. By adapting the technology platform provided by Crossroads Church, students completed their studies and were awarded bachelor's degrees from USW in July 2020.

GEO also partnered with Prison Fellowship to administer services to more than 14,000 children of GEO Continuum of Care® participants through the Angel Tree project in 2020. Thanks to the extraordinary effort of our Chaplains, many children felt the love and support from their parents receiving services in our facilities.

47 faith-based organizations partner with GFO in the U.S.





# COVID-19 SENSITIVE/ RESPONSIVE

From the beginning of the global COVID-19 pandemic, our corporate, regional, and field staff have taken steps to mitigate the risks of the novel coronavirus and have worked with our government agency partners to implement best practices consistent with the guidance issued by the Centers for Disease Control and Prevention (CDC). Ensuring the health and safety of all those entrusted to our care and of our employees has always been our number one priority.



#### **GEO's COVID-19 Mitigation Initiatives**

 We issued guidance to all our facilities, consistent with the guidance issued for correctional and detention facilities by the CDC.

#### **Testing**

- We increased testing capabilities at our U.S. Secure Services facilities and entered into contracts with multiple commercial labs to provide adequate testing supplies and services.
- We invested approximately \$2 million to acquire 45 Abbott Rapid COVID-19 ID NOW devices and testing kits capable of diagnosing not only COVID-19, but also influenza and strep throat.
- As of the end of November 2021, we had administered more than 192,000 COVID-19 tests to those in our care at our U.S. Secure Services facilities.

#### **Bi-Polar Ionization**

 We invested \$3.7 million to install bi-polar ionization air purification systems at select U.S. Secure Services facilities to reduce the spread of airborne bacteria and viruses.

#### **Facemasks and Personal Hygiene Products**

 We have provided continuing access to facemasks to all inmates and detainees, with a minimum of three facemasks per week or more often upon request. We increased the frequency of distribution of personal hygiene products, including soap, shampoo and body wash, and tissue paper, and we are ensuring the daily availability of bars of soap or soap dispensers at each sink for hand washing in all of our facilities.

#### **Social Distancing**

- We have implemented social distancing pursuant to directives from our government agency partners and communicated these obligations and requirements via meetings, memos, and postings.
- We deployed floor markers throughout our facilities to inform and encourage social distancing and modified facility movements to accommodate social distancing.

#### **Engineering Controls**

- We temporarily suspended onsite social visitation.
- We established requirements for staff to complete a medical questionnaire and pass a daily temperature check.
- We modified intake procedures to screen new inmates/detainees and established isolation and quarantine procedures for COVID-19 positive and symptomatic cases, consistent with CDC guidelines.

#### Administrative/Work Practice Controls

- We posted reminders regarding coughing and sneezing etiquette, the importance of frequent handwashing, and the use of facemasks.
- We increased cleaning and disinfection of facilities, including high-touch areas (e.g., doorknobs/handles, light switches, handheld radios), housing unit dayrooms, dining areas, and other areas where individuals assemble.
- We advised our employees to remain home if they exhibit flu-like symptoms, and we have exercised flexible paid leave and paid time off policies to allow employees to remain home if they exhibit flu-like symptoms or to care for a family member.
- We enacted quarantine and testing policies for any employees who may have come into contact with an individual who has tested positive for COVID-19.

#### **Vaccination**

 We are working closely with our government agency partners and State and Local Health Departments to coordinate vaccination efforts for staff, inmates, detainees, and residents at our secure services facilities, reentry centers

- and programs across the country; these measures align with recommendations from the CDC's Advisory Committee on Immunization Practices (ACIP) and criteria established through the FDA's approval process.
- The timing of vaccine distribution to staff, inmates, detainees, and residents is being directed by the Local and State Health Departments in jurisdictions where we operate through the guidance and prioritization recommendations offered by the CDC and ACIP.
- As of the end of November 2021, GEO has worked with our government agency partners and State and Local Health Departments to administer vaccinations to more than 42,000 individuals in our U.S. Secure Services facilities.

GEO is continuing to coordinate closely with our government agency partners and local health agencies to ensure the health and safety of all those in our care and our employees. We are grateful for our frontline employees, who are making sacrifices daily to provide care for all those in our facilities, during this unprecedented global pandemic.

GEO's full statement on COVID-19 is available on our website at geogroup.com/COVID19.



## **DIVERSIFIED EMPLOYER**

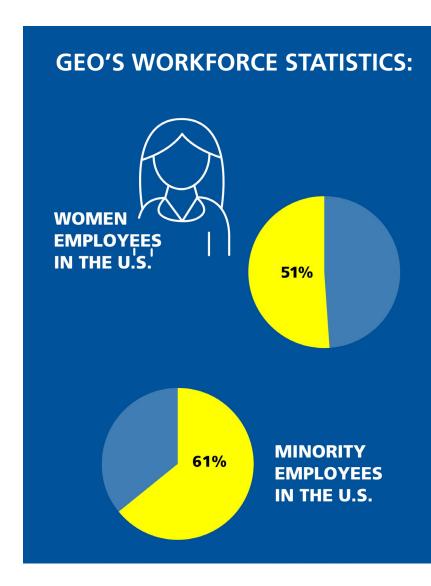
GEO is an equal opportunity employer focused on the rich diversity of our workforce with zero tolerance for all forms of workplace discrimination and sexual harassment.

Today, women comprise an equal portion of GEO's U.S. workforce and play a significant role in our leadership and management. Of GEO's 17,500 U.S. employees, 51% are female. Women account for 57% of our corporate employees, 41% of our facility security staff, and 29% of those serving in management positions as directors and above. We also continue to recruit women to our workforce, with women comprising 53% of GEO's new hires in 2020.

Women are also involved at the highest levels of our organization. Of the nine members of GEO's Board of Directors in 2020, two were women.

In all areas of our business, GEO strives to achieve wider racial and ethnic diversity. In 2020, two of our board seats were held by members of minority communities. Across our organization, under-represented minorities of the United States – including African Americans, Hispanic and Latino, Asian, Pacific Islander, Native Hawaiian and Native American/ Alaskan – currently account for 61% of our U.S. employees.

Minorities comprise 39% of GEO's corporate workforce in the U.S., 69% of our facility security staff, and 27% of those serving in management positions as directors or above. GEO's employee population is also diverse by age. Of new hires in 2020, 47% were under age 30, 38% were between ages 30 and 50, and 14% were age 50 and older.



GEO is proud to support our local communities, and we recruit more than 90% of our workforce from these communities.

EMPLOYEE DIVERSITY			EMPLOYEE DIV	ERSIT'	Y BY	AGE	
U.S. Based Employees	2020	2019	2018	U.S. Based Employees	2020	2019	2018
Total of all GEO	17,500	18,837	18,427	% Under Age of 30	27%	29%	29%
U.S. Employees	-	-	-	% Between the Ages 30 - 50	46%	45%	45%
% of all U.S. Employees - Women	51%	51%	50%	% Over Age 50	27%	26%	26%
% of all U.S. Employees - Minorities*	61%	64%	63%	Female Employees			
% of Board of Directors -	22%	25%	33%	% Under Age of 30	26%	29%	28%
Women	22 /0	23 /6	33 /6	% Between the Ages 30 - 50	48%	47%	48%
% of Board of Directors - Minorities*	22%	25%	33%	% Over Age 50	26%	24%	24%
% of Management				Minorities			
Positions - Directors or Above - Women	29%	34%	31%	% Under Age of 30	30%	32%	33%
% of Management Positions - Directors or	27%	29%	28%	% Between the Ages 30 - 50	47%	40%	45%
Above - Minorities*				% Over Age 50	23%	22%	22%
% of Corporate Employees - Women	57%	56%	58%	Management			
% of Corporate	39%	42%	38%	% Under Age of 30	1%	0%	1%
Employees - Minorities*  % of All GEO Security	33 70	72 /0	30 /0	% Between the Ages 30 - 50	39%	39%	42%
Staff-U.S. (includes Transportation) - Women	41%	41%	41%	% Over Age 50	60%	61%	57%
% of All GEO Security	/	,	,	Corporate Employees			
Staff-U.S. (includes Transportation) - Minorities*	69%	70%	68%	% Under Age of 30	9%	9%	9%
% of all U.S. Employees - Veterans	10%	11%	10%	% Between the Ages 30 - 50	49%	50%	49%
				% Over Age 50	42%	41%	42%
NEW HIRES				Security Staff (Includes Trai	nsportatio	n)	
% Under Age of 30	47%	46%	37%	% Under Age of 30	36%	39%	40%
% Age 30-50	38%	38%	49%	% Between the Ages 30 - 50	46%	43%	42%
% Over Age 50	14%	15%	27%	% Over Age 50	18%	18%	18%
% Women	53%	56%	53%	Veteran Employees			
* Includes Hispanic/Latino, Black/African	American A	merican India	n/Δlaska	% Under Age of 30	16%	14%	17%
Native, Native Hawaiian/Pacific Islander, A				% Between the Ages 30 - 50	43%	42%	42%
				% Over Age 50	41%	44%	41%



# RECRUITING U.S. MILITARY VETERANS

We are honored by the fact that many veterans of U.S. military service have made careers at GEO and contribute significantly to the company's success.

Historically, we have focused part of our national recruitment strategy on hiring veterans and those currently serving in the U.S. military reserves. GEO Group has repeatedly been cited by U.S. Veterans Magazine among its "Top Veteran Friendly Companies" and was recognized in the Fall 2020 issue as one of the "Best of the Best 2020" Top Veteran Friendly Companies.

U.S. military veterans currently working at GEO Group account for 10% of our U.S. employees.

On a quarterly basis, GEO also recognizes our veteran workforce by selecting a Veteran of the Quarter. For more information on our Veterans of the Quarter, please visit <a href="mailto:geogroup.com/">geogroup.com/</a> <a href="https://distribution.com/">HiringHeroes</a>.

More information regarding GEO's hiring practices and commitment to workforce diversity can be found on our website at <a href="mailto:geogroup.com/embracing-diversity-inclusion">geogroup.com/embracing-diversity-inclusion</a>.



#### **COMPENSATION AND BENEFITS**

GEO offers a comprehensive employee benefits program that is competitive for each of the various locations in which we operate across the United States. In 2020, the average GEO security officer starting wage was \$20.86/hour, and the average GEO employee annual salary was \$47,549.

The variety of our benefit offerings is designed to provide individual employees with the flexibility to choose coverage options and benefits that best meet their needs and address their priorities. Although there may be some regional variation in different options, such as type of healthcare coverage available, GEO's employee benefits generally include the following:

- Paid time off
- Paid Holidays
- Medical and Prescription Drug coverage
- Dental
- Vision
- Short- and Longterm Disability
- Health and Dependent Care Flexible Spending Accounts
- Basic, Additional, Spousal and Dependent Life Insurance
- 401(k) Retirement Plan

- Voluntary Whole Life Insurance
- Voluntary Critical Illness Insurance
- Voluntary Accident Insurance
- Legal and Identity Theft Protection Plans
- Employee Assistance Program
- Tuition
   Reimbursement
- Employee Rewards and Recognition Programs
- Employee Discounts

# EMPLOYEE TRAINING AND DEVELOPMENT

GEO has a robust training program for staff at all levels of the organization. Our training of managerial, administrative, and security staff is based on the standards set by the American Correctional Association (ACA). The training requires a minimum of 120 hours of training within the staff member's first year of employment and 40 additional hours of recurring training on an annual basis.

Training includes classroom learning, practical exercises, course examinations, and on-the-job training. GEO's corporate policy also mandates that every new employee receive orientation training prior to undertaking any assignments. In addition, all employees must participate in training focused on our company's policies related to human rights, anti-discrimination, anti-sexual harassment, ethics compliance, anti-corruption, unethical or illegal activity reporting procedures, and anti-retaliation.

The GEO Secure Services Training Division develops, implements, modifies and updates nationally recognized curricula through needs analysis. GEO incorporates feedback from employee and participant surveys, Quarterly Facility Training Advisory meetings, GEO Quality Control Division's feedback and customer feedback, as well as researched trends from other training providers. The information is used to develop or update training curricula and training delivery methods.

The GEO Secure Services Training Division also develops and assigns individualized training plans based on position that combines customer, corporate and local requirements. Employees at all levels of the organization are empowered and encouraged to continually develop their

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skills and increase their knowledge. Along with formalized classroom, computer-based, virtual and on-the-job training, employees receive coaching, mentoring and continuous feedback from experienced trainers, senior employees and supervisors at each location to develop skills and alleviate skills gaps. Employee skills are assessed at the first 90 days of employment and one-year employee evaluation periods. Programs and medical employees can also earn professional credits towards certification or licensure.

# TRAINING TOPICS INCLUDE BUT ARE NOT LIMITED TO:

- GEO's Commitment to Human Rights
- Social and Cultural Awareness Core Correctional Practices (CCP)
- Understanding the Individuals in our Care
- Workplace Violence Prevention Program (WVPP)
- Suicide Awareness and Intervention
- Interpersonal Communication Skills
- Prison Rape Elimination Act Training
- Staff Professionalism and Ethics
- Facility Grievance Procedures
- Health Insurance Portability and Accountability Act (HIPAA)
- Telephone, Mail and Visiting Procedures
- Religious Opportunities
- Accountability and Security Procedures
- Life Safety, and Emergency Procedures
- Use of Force Regulations and Procedures
- Emergency Planning and Response Procedures
- Facility Disciplinary Procedures
- Search Procedures
- CPR, AED and Basic First Aid
- Report Writing
- Personal Protective Equipment (PPE)
- Giving Direction
- Contingency Management
- Universal Precautions
- Becoming Trauma Informed

# SECURE SERVICES TRAINING AND EDUCATION 2020 2019 Total Staff Training Hours: Total Annual Trainings: 20,724 22,001

COC TRAINING			
AND EDUCATION	2020	2019	2018
Total Staff Training Hours:	206,136	82,080	80,170
CoC Total Annual Trainings:	7,362	342	334

# GEO CONTINUUM OF CARE TRAINING INSTITUTE

The GEO Continuum of Care® Training Institute trains all staff from the time of hire and on a regular basis throughout their employment. The training institute creates and implements staff and facility development needs through a needs analysis. GEO incorporates feedback from staff and participant surveys as well as research trends to develop training curricula and lesson plans. Our staff development plans include basic training, refresher training, advanced training, skillset certifications, and new managers training.

Staff also receive training on contract-specific requirements, communication and de-escalation skills, conflict resolution, self-defense, group facilitation, and GEO's internal proprietary case management system. In addition, we provide training on Evidenced-Based Practices, Motivational Interviewing techniques, Trauma Informed Care, and training specific to the various programs offered to GEO Continuum of Care® participants.

The GEO Continuum of Care® Training Institute incorporates individualized learning programs into each training plan. Staff are empowered to be a part of their development. GEO works with staff to develop a skills gap analysis to assist in identifying the skills a position requires and compares them to

current skill level. Education and Treatment staff can earn professional credits towards certification or licensure. All staff work with trainers to develop professional development tracks.

#### **Online Learning Management System**

To provide our employees with the most up-to-date training materials, online courses, and training reporting, we use an internal, online Learning Management System. This system is available to employees 24/7 and includes self-guided courses and reference materials for various topics.

#### **Compliance Training**

The GEO Contract Compliance division has a dedicated team responsible for the training of new compliance staff at each facility across all GEO divisions. The training program includes topics such as quality control program procedures, auditing techniques, policy writing, and corrective action plan development. The department makes training available annually to compliance staff via an electronic learning management system.

#### **Contractor and Volunteer Training**

GEO has developed a training program designed to introduce all contractors and volunteers to our facilities and programs. This is a self-paced course that must be completed by all contractors and volunteers prior to beginning their services. The course includes GEO's Commitment to Human Rights, Facility Rules and Regulations, Inmate/Resident Rights and Responsibilities, and Entry and Exit Procedures.

While GEO does not use contract security providers at any of our operations or facilities, our policies and training would also apply to these groups if we were ever to engage with them.

# PROVIDING HIGHER EDUCATIONAL OPPORTUNITIES

GEO employees and their family members (parent, spouse and child) are eligible to further pursue their educational goals by receiving reduced tuition rates on a variety of accredited on-line degree programs in business, education, healthcare and other disciplines provided at 11 different higher education institutions. A tuition reimbursement program is also available for GEO employees pursuing their education as they work to develop their skills and enhance their job performance. Tuition reimbursement is provided to eligible employees for courses offered by accredited colleges, universities, and secretarial and trade schools. Separately, GEO's subsidiary,

BI Incorporated, offers an education assistance program to its full-time employees with at least one year of service. For more information on GEO's educational opportunities please visit <a href="https://www.geogroup.com/education">https://www.geogroup.com/education</a>.

# LABOR UNIONS AND COLLECTIVE BARGAINING

GEO welcomes the participation of labor unions in our facilities and respects the rights of individual employees to choose whether or not to join labor organizations. In the United States, employees in 42 of our facilities are represented by unions. At those locations, 5,417 employees are represented by unions which accounts for 30% of our U.S. workforce.

We believe we actively participate in the collective bargaining process, negotiate in good faith, and maintain good working relationships with each of the labor unions representing our employees.

UNIONIZED EMPLOYEES – U.S. (2020-2018)

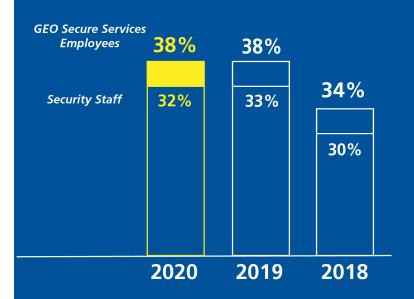
2020	2019	2018
30%	31%	28%

# COMPLIANCE WITH FEDERAL AND STATE EMPLOYMENT LAWS

In each of our operations throughout the United States, GEO complies with all federal, state and local labor and employment laws and regulations. We have a zero tolerance, anti-discrimination, and anti-sexual harassment policy. These policies are covered as part of the training conducted for all our U.S. employees and includes detailed instructions for multiple ways for employees to report incidents that they suspect to be in violation of these policies.

We strictly enforce these policies, reinforce them in our employee communications, and maintain a comprehensive and fair process for promptly investigating incidents. We take action as appropriate, including terminating any individual who violates these policies.

# PERCENTAGE OF UNIONIZED EMPLOYEES (2020-2018)

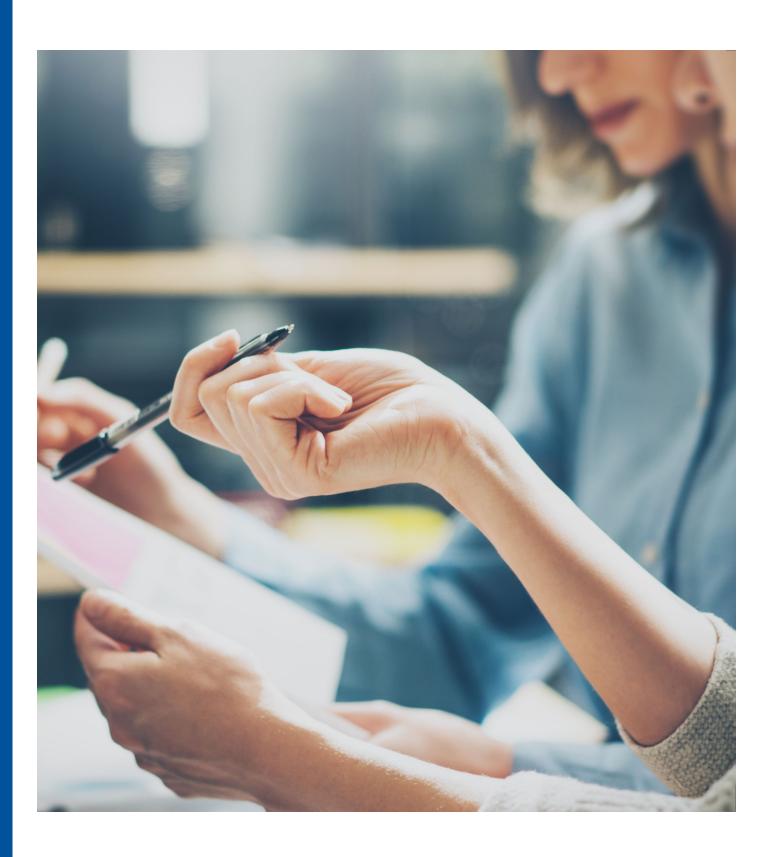


Throughout our organization, we recognize the needs of employees facing challenging life circumstances and respect their rights under the Federal Medical Leave Act (FMLA). In 2020, as many of our team members addressed personal challenges, including the impact of COVID-19 on their families, 2,400 U.S. employees utilized the FMLA.

In addition, GEO engages in interactive processes to ensure that qualified individuals with disabilities under the Americans with Disabilities Act (ADA), as amended by the ADA Amendments Act, as well as, under all applicable state or local laws, are afforded a reasonable accommodation in the workplace for their disabilities.

GEO fully supports and complies with all applicable federal, state, and local laws and respects the rights of employees under the law.

# **APPENDIX**



GRI Standard	Disclosure	Report Location or External GEO Reference	
GRI 102: General Disclosures			
	Organizational profile		
	102-1 Name of the organization	The GEO Group, Inc.	
	102-2 Activities, brands, products, and services	About the GEO Group; Page 4 Core Values & Mission Statement; Page 5 2020 10-K; Page 3-23	
	102-3 Location of headquarters	Boca Raton, FL  GEO HO Facility Details 2020 10-K; Page 1	
	102-4 Location of operations	About the GEO Group; Page 4 2020 10-K; Pages 10-17	
	102-5 Ownership and legal form	Publicly-traded Real Estate Investment Trust 2020 10-K; Page 1 and 3	
	102-6 Markets served	About the GEO Group; Page 4 Core Values & Mission Statement; Page 5 2020 10-K; Page 3-23	
	102-7 Scale of the organization	2020 10-K; Page 3-49	
	102-8 Information on employees and other workers	Diversified Employer; Pages 52-57 2020 10-K; Pages 20-21	
	102-9 Description of the organization's supply chain	Engaging with Our Stakeholders; Pages 40-43	
GD1400 G	102-10 Significant changes to the organization and its supply chain	There have been no significant changes to the organization or its supply chain.	
GRI 102: General Disclosures 2016	102-11 Precautionary Principle or approach	Delivering on Our Promise: Ethics and Governance; Pages 16-19 Protecting Human Rights Through Oversight and Contract Compliance; Pages 28-31	
	102-12 External initiatives	Protecting Human Rights Through Oversight and Contract Compliance; Pages 28-31	
	102-13 Membership of associations	Diversified Employer; Pages 52-57 Engaging with Our Stakeholders; Pages 40-43	
	Strategy		
	102-14 Statement from senior decision-maker	Letter from our Executive Chairman of the Board; Page 1	
	102-15 Key impacts, risks, and opportunities	About The GEO Group; Pages 4-7	
	Ethics and integrity		
	102-16 Values, principles, standards, and norms of behavior	Core Values & Mission Statement; Page 5 Protecting Human Rights Through Oversight and Contract Compliance; Pages 28-31 Delivering on Our Promise: Ethics and Governance; Pages 16-19	
		GEO's Code of Business Conduct and Ethics	
	102-17 Mechanisms for advice and concerns about ethics	Protecting Human Rights Through Oversight and Contract Compliance; Pages 28-31 Delivering on Our Promise: Ethics and Governance; Pages 16-19	
		GEO's Code of Business Conduct and Ethics Business Code & Ethics: Anti-bribery Corruption Training & Whistleblower Programs	

GRI Standard	Disclosure	Report Location or External GEO Reference
	Governance	
	102-18 Governance structure	Delivering on Our Promise: Ethics and Governance; Pages 16-19  2021 Proxy Statement; Pages 13-20
	102-20 Executive-level responsibility for economic, environmental, and social topics	Letter from our Executive Chairman of the Board; Page 1 Protecting Human Rights Through Oversight and Contract Compliance; Pages 28-31 Delivering on Our Promise: Ethics and Governance; Pages 16-19
	102-21 Consulting stakeholders on economic, environmental, and social topics	GEO Group ESG Process, Rationale and Objectives; Page 6 Engaging with Our Stakeholders; Pages 40-43
	102-22 Composition of the highest governance body and its committees	Delivering on Our Promise: Ethics and Governance; Pages 16-19  2021 Proxy Statement; Pages 13-20
	102-23 Chair of the highest governance body	Delivering on Our Promise: Ethics and Governance; Pages 16-19  2021 Proxy Statement; Pages 18
	102-24 Nominating and selecting the highest governance body	2021 Proxy Statement; Pages 3-8; 16-18
		Delivering on Our Promise: Ethics and Governance; Pages 16-19
GRI 102: General Disclosures	102-25 Conflicts of interest	GEO's Code of Business Conduct and Ethics 2021 Proxy Statement; Pages 18-19; 22
	102-26 Role of highest governance body in setting purpose, values, and strategy	GEO Group ESG Process, Rationale and Objectives; Page 6 Delivering on Our Promise: Ethics and Governance; Pages 16-19
	102-27 Collective knowledge of highest governance body	GEO Group ESG Process, Rationale and Objectives; Page 6 Delivering on Our Promise: Ethics and Governance; Pages 16-19
2016	102-31 Review of economic, environmental,	2021 Proxy Statement; Pages 4-8 GEO Group ESG Process, Rationale and Objectives;
	and social topics	Page 6  Business Code & Ethics: Anti-bribery Corruption
	102-33 Communicating critical concerns	Training & Whistleblower Programs  Corporate Policy & Procedure: Chapter 5 - Oversight
	102-35 Remuneration policies	2021 Proxy Statement; Pages 22-45
	102-36 Process for determining remuneration	2021 Proxy Statement; Pages 45-48
	102-37 Stakeholders' involvement in remuneration	2021 Proxy Statement; Pages 45-51
	102-38 Annual total compensation ratio	2021 Proxy Statement; Page 45
	102-39 Percentage increase in annual total compensation ratio	2021 Proxy Statement; Pages 45-48
	Stakeholder engagement	
	102-40 List of stakeholder groups	Engaging with Our Stakeholders; Pages 40-43
	102-41 Collective bargaining agreements	Diversified Employer; Pages 52-57
	102-42 Identifying and selecting stakeholders	Engaging with Our Stakeholders; Pages 40-43
	102-43 Approach to stakeholder engagement	Engaging with Our Stakeholders; Pages 40-43
	102-44 Key topics and concerns raised	Engaging with Our Stakeholders; Pages 40-43 Materiality Index; Page 7
	Reporting practice	
	102-45 Entities included in the consolidated financial statements	2020 10K; Pages 85-90
	102-46 Defining report content and topic Boundaries	About This Report and Foward-Looking Information; Page 3

GRI Standard	Disclosure	Report Location or External GEO Reference
GRI 102: General Disclosures 2016	102-47 List of material topics	Materiality Index; Page 7
	102-48 Restatements of information	No restatements of information
	102-49 Changes in reporting	No changes in reporting
	102-50 Reporting period	January 1, 2020 - December 31, 2020
	102-51 Date of most recent report	September 2020
	102-52 Reporting cycle	GEO reports on an annual basis
	102-53 Contact point for questions regarding the report	IR@geogroup.com
	102-54 Claims of reporting in accordance with the GRI Standards	This report has been prepared in accordance with the GRI Standards: Core option
	102-55 GRI content index	GRI Standards Content Index; Pages 58-63
	102-56 External assurance	No external assurance is provided at this time
<b>Economic Topics</b>		
Economic Performance		
GRI 103: Management Approach	103-1-103-3 Aspects of the Management Approach	2020 10K; Pages 50-77
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	2020 10K; Pages 85-89
Procurement Practices		
GRI 103: Management Approach	103-1-103-3 Aspects of the Management Approach	Engaging with Our Stakeholders; Pages 40-43
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	Engaging with Our Stakeholders; Pages 40-43
Anti-corruption		
GRI 103: Management Approach	103-1-103-3 Aspects of the Management Approach	Delivering on Our Promise: Ethics and Governance; Pages 16-19
	205-1 Operations assessed for risks related to corruption	Delivering on Our Promise: Ethics and Governance; Pages 16-19
GRI 205: Anti-corruption 2016	205-2 Communication and training about anti-corruption policies and procedures	Delivering on Our Promise: Ethics and Governance; Pages 16-19
<b>Environmental Topics</b>		
Energy		
GRI 103: Management Approach	103-1-103-3 Aspects of the Management Approach	Environmentally Responsible; Pages 34-37
	302-1 Energy consumption within the organization	Environmentally Responsible; Pages 34-37
CDI 202: En aven 2046	302-3 Energy intensity	Environmentally Responsible; Pages 34-37
GRI 302: Energy 2016	302-4 Reduction of energy consumption	Environmentally Responsible; Pages 34-37
	302-5 Reductions in energy requirements of products and services	Environmentally Responsible; Pages 34-37
Water		
GRI 103: Management Approach	103-1-103-3 Aspects of the Management Approach	Environmentally Responsible; Pages 34-37
GRI 303: Water 2018	303-3 Water withdrawal	Environmentally Responsible; Pages 34-37

cover 1 1	51.1	Report Location or
GRI Standard	Disclosure	Report Location or External GEO Reference
Emissions		
GRI 103: Management Approach	103-1-103-3 Aspects of the Management Approach	Environmentally Responsible; Pages 34-37
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Environmentally Responsible; Pages 34-37
	305-2 Energy indirect (Scope 2) GHG emissions	Environmentally Responsible; Pages 34-37
	305-4 GHG emissions intensity	Environmentally Responsible; Pages 34-37
	305-5 Reduction of GHG emissions	Environmentally Responsible; Pages 34-37
Social Topics		
Employment		
GRI 103: Management Approach	103-1-103-3 Aspects of the Management Approach	Diversified Employer; Pages 52-57
CRI 401. Employment 2016	401-1 New employee hires and employee turnover	Diversified Employer; Pages 52-57
GRI 401: Employment 2016	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Diversified Employer; Pages 52-57
Occupational Health and Safety		
GRI 103: Management Approach	103-1-103-3 Aspects of the Management Approach	Ensuring Safety and Security; Pages 38-39
	403-1 Occupational health and safety management system	Ensuring Safety and Security; Pages 38-39
GRI 403: Occupational Health	403-2 Hazard identification, risk assessment, and incident investigation	Ensuring Safety and Security; Pages 38-39
and Safety 2018	403-5 Worker training on occupational health and safety	Ensuring Safety and Security; Pages 38-39
	403-9 Work-related injuries	Ensuring Safety and Security; Pages 38-39
Training and Education		
GRI 103: Management Approach	103-1-103-3 Aspects of the Management Approach	Diversified Employer; Pages 52-57
GRI 404: Training and Education	404-1 Average hours of training per year per employee	Diversified Employer; Pages 52-57
2016	404-2 Programs for upgrading employee skills and transition assistance programs	Diversified Employer; Pages 52-57
Diversity and Equal Opportunity		
GRI 103: Management Approach	103-1-103-3 Aspects of the Management Approach	Diversified Employer; Pages 52-57
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Diversified Employer; Pages 52-57
Security Practices		
GRI 103: Management Approach	103-1-103-3 Aspects of the Management Approach	Diversified Employer; Pages 52-57
GRI 410: Security Practices 2016	410-1 Security personnel trained in human rights policies or procedures	Protecting Human Rights Through Oversight and Contract Compliance; Pages 28-31 Diversified Employer; Pages 52-57
Human Rights Assessment		
GRI 103: Management Approach	103-1-103-3 Aspects of the Management Approach	Human Rights Focused; Pages 20-27 Protecting Human Rights Through Oversight and Contract Compliance; Pages 28-31
GRI 412: Human Rights Assessment 2016	412-1 Operations that have been subject to human rights reviews or impact assessments	Protecting Human Rights Through Oversight and Contract Compliance; Pages 28-31
	412-2 Employee training on human rights policies or procedures	Protecting Human Rights Through Oversight and Contract Compliance; Pages 28-31 Diversified Employer; Pages 52-57
Public Policy		
GRI 103: Management Approach	103-1-103-3 Aspects of the Management Approach	Engaging with Our Stakeholders; Pages 40-43

GRI Standard	Disclosure	Report Location or External GEO Reference
GRI 415: Public Policy 2016	415-1 Political contributions	Engaging with Our Stakeholders; Pages 40-43
Customer Privacy		
GRI 103: Management Approach	103-1-103-3 Aspects of the Management Approach	Delivering on Our Promise: Ethics and Governance; Pages 16-19
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Delivering on Our Promise: Ethics and Governance; Pages 16-19



#### **WORLD HEADQUARTERS**

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