



The GEO Group, Inc. ®

HUMAN RIGHTS AND ESG REPORT

2019



For the last three decades, The GEO Group has partnered with government agencies throughout the United States and around the world to deliver private-sector solutions to meet public-sector challenges. Our high-quality services have been underpinned by the unmatched dedication of our employees and an unwavering organizational commitment to operational excellence across all our service lines.

Over the course of 2020, the determination and commitment of our frontline employees have been tested like never before, as our facilities and programs have met the unprecedented challenges of the COVID-19 pandemic. From the beginning of this crisis, our corporate, regional, and field staff have worked together to implement important steps to mitigate the risks of COVID-19 to all those in our care and our employees.

Working with our government partners, we have established best practices consistent with the guidance issued by the Centers for Disease Control and Prevention. We have dedicated significant resources to deploy personal protective equipment, including facemasks to all those in our care and our employees across all our facilities. Additionally, we have focused on ramping up diagnostic testing.

We are incredibly proud of all our employees whose daily commitment and dedication have allowed our company to implement steps to mitigate this unprecedented global pandemic. Ensuring the health and safety of all those in our facilities and our employees remains our number one priority.

The publication of our second Human Rights and Environmental, Social and Governance (ESG) report is an important step in furthering our commitment to providing transparent and comprehensive ESG disclosures and metrics.

This 88-page report builds on our first ever Human Rights and ESG report, which provided disclosures related to how we ensure that our employees are aware of, and know how to apply, our company's 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 incorporates updated disclosures and metrics for the calendar year 2019 based on recognized ESG reporting standards, related to the development of our employees; our adherence to ethical governance practices throughout our company; and our efforts to advance environmental sustainability in the construction and operation of our facilities.

In the area of environmental sustainability, for the first time in our company's history, we undertook a company-wide initiative to collect and disclose comprehensive data on the energy consumption, water usage, recycling programs, and scope 1 and scope 2 greenhouse gas emissions across all our facilities. We have also adopted a new environmental policy statement focusing on environmental protection and awareness, waste and energy reduction, risks and opportunities related to climate change, and the implementation of GEO's Environmental Management System.

The report also highlights our continued commitment to improving the lives of those entrusted to our care by providing enhanced rehabilitation and post-release support services through our award-winning GEO Continuum of Care (CoC) program. During 2019, we achieved an increase in the number of rehabilitation programming hours, GED/High School Equivalency degrees, vocational training certifications, and substance abuse treatment completions.

Our CoC program delivers evidence-based offender rehabilitation that has proven to reduce recidivism by combining in-custody programming (academic and vocational training, substance abuse treatment, and faith and character-based strategies) followed by post-release support services (transitional housing, clothing, food, transportation and job placement assistance).

We are very proud of the success of our CoC program and of the steadfast commitment of our 23,000 employees, whose daily sacrifices have allowed GEO to be at the forefront of delivering high quality services on behalf of our government agency partners. We recognize the continued interest from our diverse stakeholder groups in learning more about our company, and we welcome an ongoing engagement with our stakeholders as our company continues its ESG journey in the future.

A handwritten signature in black ink that reads "George Zoley".

George C. Zoley

Chairman, CEO and Founder

ABOUT THIS REPORT AND FORWARD-LOOKING INFORMATION

ABOUT THIS REPORT

This is GEO's second annual Human Rights and ESG Report. This report illustrates how we bring our aspirational goals to life as a leading government services provider. It covers our human rights, environmental, social and governance activities, performance and approach for calendar year 2019, focusing on issues we have determined to be of greatest importance. Our 23,000 employees, who often face difficult operational challenges, are not always able to achieve their best efforts and GEO's desired outcomes. We are committed to continuous improvement in the areas of human rights, environmental, social and governance activities.

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. 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



GEO Headquarters

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.

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COMPANY OVERVIEW

ABOUT THE GEO GROUP

The GEO Group, Inc. (NYSE:GEO) is a publicly-traded, fully-integrated real estate investment trust (“REIT”) specializing in the design, financing, development, and operation of secure facilities, 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 management, in-custody rehabilitation, community reentry programs, and electronic monitoring services.

GEO’s worldwide operations include the ownership and/or management of approximately **93,000 beds at 125 secure facilities, processing centers and community reentry centers, with a worldwide workforce of approximately 23,000 professionals.**

Our corporate headquarters are located in Boca Raton, Florida. We have three regional offices, located in Los Angeles, California; San Antonio, Texas; and Charlotte, North Carolina.

GEO is organized into two business units: **GEO Secure Services** and **GEO Care**.

Throughout 2019, our GEO Secure Services business unit served over 300,000 individuals, while managing an average daily population of more than 60,000 in our secure services facilities in the United States. Our GEO Care business unit served approximately 700,000 individuals during the year, managing an average daily census of approximately 200,000 participants in our community reentry, youth services treatment, and electronic monitoring programs.

From the development and management of modern facilities to the provision of evidence-based rehabilitation and post-release support in the community, GEO offers fully diversified, high-quality services to government agencies around the world. GEO operates in several different areas, including:

GEO’S WORLDWIDE OPERATIONS INCLUDE THE OWNERSHIP AND/OR MANAGEMENT:

93,000 Beds

125 Secure facilities, processing centers and community reentry centers

23,000 Professional Workforce

Federal services

GEO contracts with three federal agencies: Federal Bureau of Prisons (BOP), U.S. Marshals Service (USMS), and U.S. Immigration and Customs Enforcement (ICE).



State facilities

GEO manages correctional and rehabilitation facilities on behalf of state correctional agencies (i.e., departments of corrections) in the U.S.

County and local services

GEO manages a small number of jails for local jurisdictions in the United States predominately housing pre-trial and pre-sentencing (and, in some cases, short-term sentenced) individuals.

Community reentry services

GEO provides services in residential and non-residential reentry centers under contract with federal, state and local government agencies. These centers allow individuals to receive community and rehabilitation services, such as education, cognitive behavioral treatment, and employment assistance.

Youth treatment

Abraxas Youth & Family Services manages youth treatment facilities, serving adolescents and youthful individuals on behalf of state and local government agencies.

Electronic monitoring

GEO's BI subsidiary is a leading provider of electronic monitoring services – including radio frequency, GPS, and alcohol monitoring devices – to federal, state, and local government agencies. At the federal level, BI provides electronic monitoring and case management services to ICE under the Alternatives to Detention Program, known as the Intensive Supervision and Appearance Program (ISAP).

Secure transportation

GEO's transportation division, GEO Transport, Inc. provides secure ground and air transfer services to federal, state, and local government agencies in the United States and internationally.

Commitment to Excellence in Service

GEO and our 23,000 employees share a strong commitment to comply with all requirements set by our government agency partners, and applicable regulatory authorities and oversight agencies – especially those involving the safety, security and human rights of the individuals in our care, our employees, and the contractors and visitors at each of the facilities we operate.

We are constantly exploring ways to enhance care and improve outcomes as we aspire to be a leading provider of in-custody rehabilitation and community re-entry services. Over the last five years, we have formally established, staffed, and implemented the GEO Continuum of Care® programs at 20 of our facilities to provide enhanced, in-custody rehabilitation programs, including cognitive behavioral treatment, integrated with post-release support services.

More details are provided in the **Making an Impact: Addressing Recidivism** section of this report, as well as on our website [wearegeo.com/continuum-of-care/](https://www.ourege.com/continuum-of-care/)

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 expanding our rehabilitation programs to reach greater numbers of individuals in our care and post-release through our GEO Continuum of Care®*.

GEO’s diversified services platform provides organizational capabilities for the delivery of educational and vocational programs, cognitive behavioral and substance abuse treatment, and faith-based and character-based services. The GEO Continuum of Care® integrates enhanced in-custody rehabilitation programs, including cognitive behavioral treatment, with post-release support services.

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 professionals, but 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 section of ESG Report on Making an Impact: Addressing Recidivism and details provided on the GEO website at wearegeo.com/continuum-of-care/

COVID-19 RESPONSE

Ensuring the health and safety of our employees and all those in our care has always been our number one priority. As a longstanding provider of essential government services, GEO Group has extensive experience in the implementation of best practices for the prevention, assessment, and management of infectious diseases.

GEO GROUP'S STEPS TO ADDRESS AND MITIGATE THE RISKS OF COVID-19

We are committed to ensuring that all GEO facilities operate safely, without overcrowded conditions and provide access to regular handwashing with clean water and soap. Our secure services facilities provide 24/7 access to healthcare services.

Our ICE Processing Centers typically have approximately double the number of healthcare staff, as compared to state correctional facilities. With respect to treating infectious diseases, most GEO Group facilities are equipped with Airborne Infection Isolation Rooms.

HEIGHTENED HEALTH AND SAFETY MEASURES TO ADDRESS COVID-19

As COVID-19 has spread across the U.S. and around the world, GEO Group's employees and facilities have also been impacted by the pandemic. We have implemented additional measures to ensure the health and safety of all those entrusted to our care and our employees, including the following:

- Issued guidance to all our facilities, consistent with the guidance issued for correctional and detention facilities by the [Centers for Disease Control and Prevention \(CDC\)](#).
- Updated our policies and procedures to include best practices for the prevention, assessment, and management of COVID-19.
- Provided educational guidance to our employees and individuals in our care on preventative measures to avoid the spread of COVID-19.
- Adjusted laundry and meal schedules.
- Increased the frequency of distribution of personal hygiene products and ensured the daily availability of soap or soap dispensers at each sink in all our facilities.
- Deployed specialized sanitation teams to sterilize high-contact areas of our facilities.
- Developed intensive schedules and procedures for cleaning and disinfecting facility spaces beyond normal cleaning activities.
- Procured additional cleaning equipment and sanitation products that are proven healthcare-grade disinfectants.
- Advised employees to remain home if they exhibit flu-like symptoms.
- Exercised flexible paid leave and Paid Time Off policies to allow for employees to remain home if they exhibit flu-like symptoms or to care for a family member.
- Engaged with our government agency partners to suspend non-essential visitation at our facilities.
- Employed additional measures during the intake and entry process at all facilities to include screening for COVID-19.
- Ordered and received swab kits for COVID-19 from a national supplier; enacted quarantine and testing policies at our secure services facilities for any employees who may have come into contact with anyone testing positive for COVID-19.
- Worked closely with our government agency partners and local health officials at our secure services facilities to develop COVID-19 emergency plans and testing policies for those in our care.

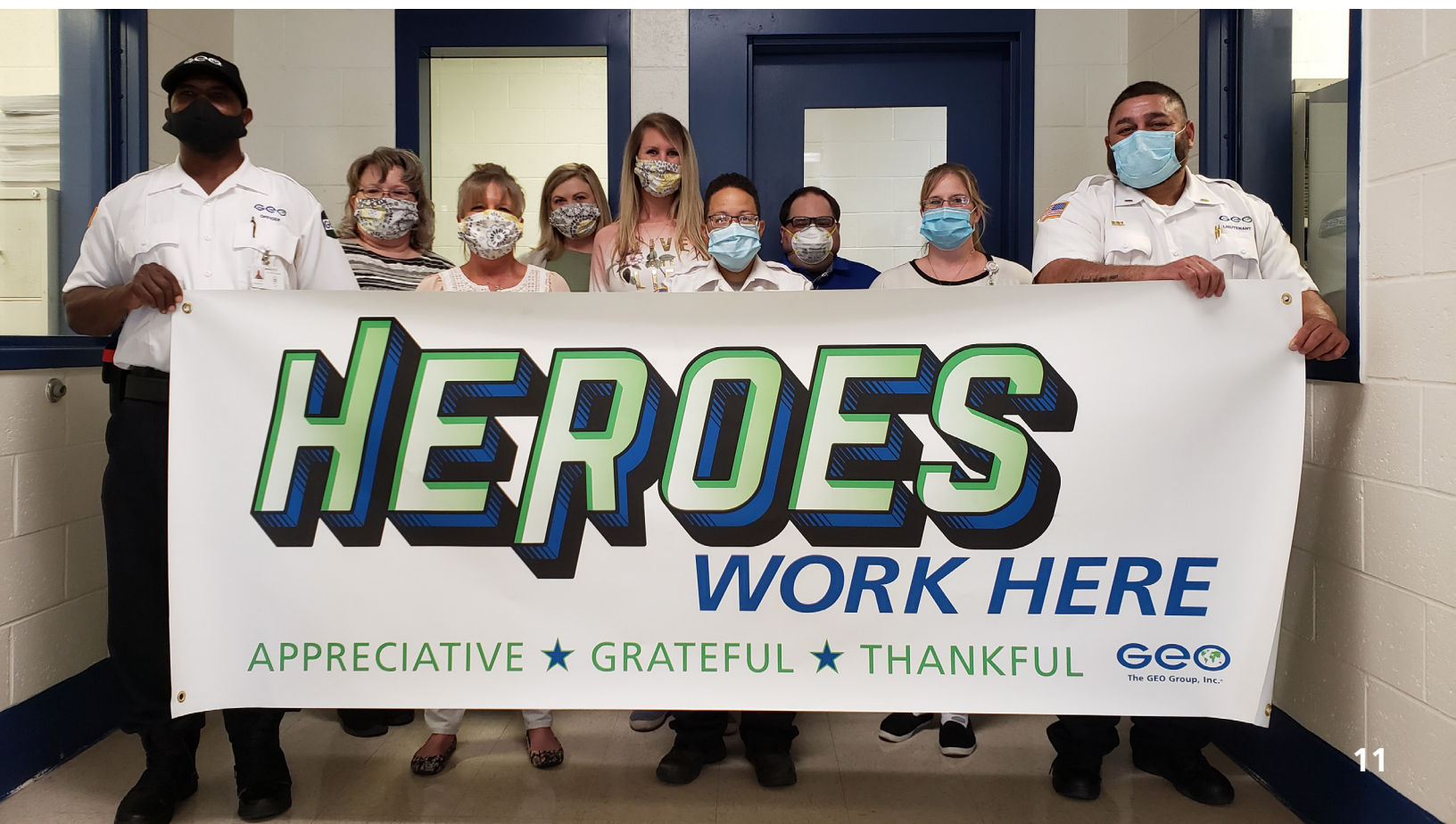
- In March of 2020, we began procuring additional Personal Protective Equipment (PPE) and issuing it as clinically needed at facilities impacted by COVID-19.
- Beginning in April of 2020, we coordinated with our government agency partners to distribute Personal Protective Equipment (including facemasks to all staff, inmates, detainees, and residents as a precautionary measure) at all of our Federal Bureau of Prisons facilities, ICE Processing Centers, U.S. Marshals facilities, state correctional facilities, local correctional facilities and jails, residential reentry centers, and youth services residential facilities.
- We've continued to actively procure Personal Protective Equipment, including face masks, in order to be able to provide all inmates and detainees with a minimum of three face masks per week, or more often upon request.
- As a service provider, we have disclosed all information related to COVID-19 testing, cases, and fatalities to our federal, state, and local government partners, as well as state and local health officials, throughout the course of the pandemic.

- As of mid-September 2020, we had administered approximately 34,000 COVID-19 tests to those in our care by working with our government partners to increase testing capabilities at an increasing number of our secure services facilities.
- We have invested approximately \$2 million to acquire 45 Abbott Rapid COVID-19 ID NOW devices and testing kits to be deployed to our GEO Secure Services Facilities in October 2020 to test for COVID-19, as well as Influenza and Strep Throat.

Along with implementing all of these measures, GEO Group 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.

For further information on **GEO Group's COVID-19 measures**, visit: geogroup.com/COVID19



GEO GROUP ESG PROCESS, RATIONALE AND OBJECTIVES



This report provides an update to GEO’s first human rights and corporate sustainability report that was issued in September 2019. As a follow-up to the company’s initial report, this update was developed referencing the GRI Standards (Global Reporting Initiative) and the UN Guiding Principles on Business and Human Rights.

Our annual reporting is an outgrowth of our ongoing engagement with many of our stakeholders – and we continue to work to integrate their viewpoints with respect to specific areas of environmental, social, governance (ESG) issues and topics.

We chose to reference these two globally accepted frameworks in our reporting to provide all of our stakeholders, including investors, employees, customers and others, a standardized and transparent disclosure process in assessing our progress in the critical ESG aspects of our organization.

As all of us at GEO continue our sustainability journey, we look forward to working with our stakeholders to evaluate our efforts for achieving continuous improvements in ESG performance and results.

BUILDING ON LONGSTANDING COMMITMENTS TO HUMAN RIGHTS AND SUSTAINABILITY

From a startup company more than 30 years ago, GEO has grown rapidly over the years to become a leader in the delivery of secure facility services, community reentry programs, and evidence-based rehabilitation. We have expanded both domestically and internationally and now operate 125 facilities on behalf of government customers across four continents.

Dating back to our earliest years, we have operated with a strong commitment to ethics in all aspects of our business and to respecting the human rights of all persons in our care.

Across the U.S. and in all parts of the world where 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 numerous accreditation entities applicable to our operations.

Over the years, we have worked in close collaboration with stakeholders, including numerous

faith-based organizations and NGOs, to expand the developmental, educational and employment opportunities available to those in our care.

We also 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.

GEO recognizes its commitment to all of our stakeholders and strives to be the best organization we can be for everyone in our care and our employees, the communities in which we operate, and our investors, as well as the many businesses, religious and faith-based groups, unions and other organizations with which we have relationships.

To those ends, 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.

We also recognize that our challenges continue to evolve, in some instances becoming increasingly complex. In response, we are continuing to take steps to enhance and improve our organizational capabilities and develop new resources to meet changing societal needs. 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.

Communities throughout the country, including many communities in which we provide care, continue to face the challenge of dealing with opioid addiction. We continue to work with our stakeholders and those in the medical community to find effective ways to help victims who suffer from addiction survive and emerge from their dependencies.

Our team is constantly working to develop and refine approaches that will produce higher rates of successful outcomes for those in our care.

[For more details see section, *Making an Impact: Addressing Recidivism.*]



UNITED NATIONS HUMAN RIGHTS OFFICE OF THE HIGH COMMISSIONER

OUR COMMITMENT TO RESPECTING HUMAN RIGHTS

For more than three decades, GEO has maintained a strong commitment to respect human rights, extending to all of our approximately 23,000 employees and contractors and more than 250,000 individuals in our care at any given time. To protect human rights, we are committed to 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 formalized this longstanding commitment with the adoption of a Global Human Rights Policy in 2013, in recognition of the critical role that respect for human rights plays in our operations in the United States and around the world.

As part of this policy, we provide a safe and secure environment, nutrition, clothing, sanitation, 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, which is particularly important since many of our facilities are located in areas prone to excessive heat or weather conditions. [For more details see section, *Our Commitment to Respecting Human Rights.*]

We also embrace diversity and inclusion across our enterprise. Women and minorities

account for the majority of our U.S. employee population and comprise a significant percentage of our officers and managers at all levels of our organization. [For more details see section, *Creating Opportunities: Developing our People.*]

Regarding environmental responsibility, we have been tracking our utilities at each of our facilities for the past several years in an effort to encourage conservation and sustainability. We have embraced green building concepts at all of our new facilities and in the refurbishment or revitalization of our existing facilities. For the first time this year, we are reporting on greenhouse gas emissions and other important environmental metrics. [For more details see section, *Energy and Environmental Sustainability.*]

Our board is composed of a majority of independent directors, and we are diligent in all of the various aspects of corporate governance and investor relations.



REFERENCING THE GRI STANDARDS AND UN GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS

Even as we have embraced many elements associated with a sustainable enterprise, we recognize the need for a transparent and disciplined enterprise-wide approach.

Accordingly, as in our initial ESG report, we have referenced the GRI Standards and The UN Guiding Principles on Business and Human Rights in developing this year's update, and remain committed to the following set of ongoing objectives:

- Provide greater transparency for our stakeholders and the general public with respect to our various efforts in all our facilities aimed at respecting human rights.
- Enhance our ability to flag potential issues in all areas of our operations and compress the time it takes to respond with corrective measures.
- Use widely-accepted methodologies for evaluating performance and setting objectives for improvements in corporate governance, corporate social policy, environmental impact and energy conservation.

In the process of gathering and preparing content for this follow-up report, which covers calendar year 2019 with supporting data from 2017-2019 where possible, we have been able to build upon the baseline metrics we established in our initial ESG report for many of the activities that we plan to continue to evaluate, track and report over time.

This year, we have also uncovered a number of additional areas where we need to gather additional information for effective quantification and benchmarking as GEO seeks to create short, medium, and long-term objectives going forward and to track our relevant progress on a year-over-year basis.



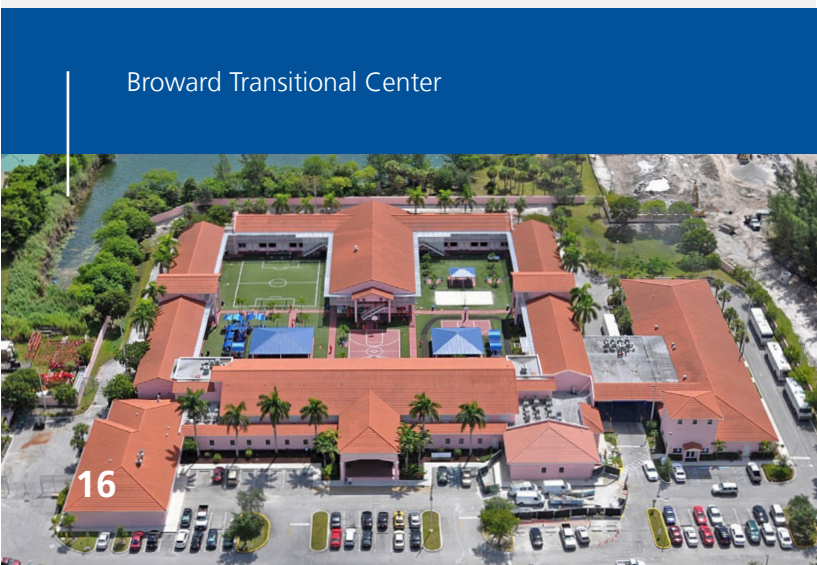
WHAT WE DON'T DO

- We don't manage any shelters or facilities housing unaccompanied migrant minors.
- We don't manage any border patrol holding facilities along the U.S. Southwest border or anywhere in the United States.
- We don't manage any facilities with tent structures or chain-link fencing in housing areas.
- We don't manage 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 no time is anyone in our care required or pressured into participating in any of the optional Voluntary Work Programs available at our facilities established under standards set by the federal government; individuals choosing not to participate are provided the same access as program participants to three full meals daily, snacks, beverages and refreshments, hygiene and sanitary supplies, recreation, education and all services available at our facilities.
- We don't play a role in passing criminal justice or immigration laws, and we have never advocated for or against criminal justice or immigration enforcement policies.

WHAT WE DO

- We manage modern immigration processing centers under contracts with the U.S. Immigration and Customs Enforcement (ICE), 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 Performance-Based National Detention Standards (PBNDS), inclusive of applicable waivers, first established under President Obama's Administration.
- We provide safe and humane residential care for civilly held individuals during the adjudication of their immigration cases, with an average length of stay of approximately 30 to 60 days.
- The professional services that we provide today at the ICE Processing Centers that we manage are no different from the services we provided for eight years under President Obama's Administration.
- We offer opportunities for detainees to participate in a variety of Voluntary Work Programs under strict guidelines provided by the federal government, which also stipulates the payment rates associated with the program. Program participants and those not participating are provided the same access to three full meals daily, water, snacks and beverages, refreshments, recreation, hygiene and sanitary supplies, education and all services available at our facilities.
- We manage federal facilities for the U.S. Bureau of Prisons that are reserved almost exclusively for non-U.S. citizens serving federal criminal sentences.

Broward Transitional Center



- We note that the overwhelming majority of correctional and detention facilities in the United States are managed and operated by public and governmental agencies. Less than 8% of correctional and detention beds are managed and/or operated by private-sector contractors.
- GEO is proud to be a world leader in offender rehabilitation, which we provide at eighteen (18) state correctional facilities and two (2) federal facilities through the 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® Division which has expanded to approximately 50 staff with subject matter experts in education, cognitive behavioral treatment, substance abuse treatment, post-release services, CoC training, and quality assurance.
- For 2020, GEO has pledged to increase its annual commitment for CoC funding to \$14 million representing approximately 9% of the company's net annual profits.
- On any typical day, there are approximately 30,000 participants enrolled in GEO offender rehabilitation programming, which resulted in 6.8 million programming hours completed during 2019.
- 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 dozen 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.

GEO'S FOCUS ON OFFENDER REHABILITATION ASSISTED INDIVIDUALS IN ACHIEVING THE FOLLOWING DURING 2019:



- On a daily basis, the GEO Post-Release Case Managers are supporting over 3,800 individuals reintegrating into their communities through our post-release support services.
- GEO's 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.
- The facilities we manage typically have on-site, full-time government monitors.

OUR COMMITMENT TO RESPECTING HUMAN RIGHTS



HUMAN RIGHTS TRAINING

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. To reinforce our commitment to respect their human rights, we promote and support that commitment through company-wide awareness and training programs.

Human rights awareness and training of our staff promotes the understanding that it is everyone's responsibility to make the respect for human rights a part of all decision-making. Our human rights training represents an important investment in our ongoing efforts to maintain a culture in which the human rights of all persons are valued and respected.

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/Portals/0/Human_Rights_Training.pdf](https://www.geogroup.com/Portals/0/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.

Training includes Classroom, Practical Exercises, Course Examinations, and On-the-Job Training. GEO's corporate policy mandates that every new employee receive orientation training prior to undertaking any assignments.

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



CONTRACTOR AND VOLUNTEER TRAINING

GEO has developed a training format designed to introduce all contractors and volunteers to our facilities and programs. This is a self-paced, required course that must be completed 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.

CONTINUUM OF CARE TRAINING INSTITUTE

The GEO Continuum of Care Training Institute trains all staff from the time of hire and regularly throughout their employment. Our staff development plans include basic training, refresher training, advanced training, skillset certifications, and new manager's training.

Staff also receive training on contract-specific requirements, communication and de-escalation skills, self-defense, group facilitation, and our 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 types of programs offered to participants.

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.

Assessing Human Rights Performance

GEO acknowledges the unique nature of its operations as a provider of management services for correctional and rehabilitation facilities and immigration processing centers, as well as, community reentry and electronic monitoring services to governmental entities. We recognize the significant role that respect for human rights plays in our operations in the United States and around the world.

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

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 proscribe the daily operation of our facilities and programs.



We think it is important to point out the difference in staffing at GEO's ICE processing centers, versus that of GEO's state correctional facilities. The additional staffing at GEO's ICE processing centers is necessary to comply with the Performance Based National Detention Standards established under President Obama's Administration and continued under President Trump's Administration.

Overall staffing at GEO's ICE processing centers is approximately 30% more than that of GEO's state correctional facilities. The additional general staffing is needed to provide more (direct) supervision and transportation services for individuals in the care and custody of federal immigration authorities.

Healthcare staffing at GEO's ICE processing centers is approximately double that of GEO's state correctional facilities. The additional healthcare staffing is needed to provide appropriate treatment for individuals who have numerous health and mental health needs due to arriving from countries with limited healthcare services.

GEO facilities, compared to public sector facilities, are newer, air-conditioned, 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.
- **20** GEO facilities provide the Continuum of Care Program with additional rehabilitation staffing to foster improved case management, cognitive behavioral treatment, basic education, vocational training, and post release services.
- Most GEO facilities for ICE and the BOP have artificial turf soccer fields and covered pavilions.
- All GEO facilities have flat-screen TVs in the housing areas, legal libraries and general libraries.

Playground at Karnes County Residential Center



Basketball Court at Broward Transitional Center



LIFE SAFETY & PHYSICAL PLANT

GEO's facilities are under the oversight of our GEO Design and Construction Division located at our Corporate Headquarters. This division has a dozen subject matter experts in facility design, project management, maintenance and repair, and physical plant operations and is led by a senior vice president with three decades of facility development and maintenance experience. The division undertakes all new facility development and oversees physical plant maintenance and repair for GEO's 125 facilities.

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).

Physical plant inspections are conducted on a scheduled basis and are comprehensive to ensure the integrity of the facility and the safety of all individuals in our care and that of our valued employees, suppliers, vendors and visitors.

Across all of our operations, 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 facilities we own and/or operate.

Each facility:

- employs a trained Fire/Safety Manager responsible for life safety, physical safety, environmental governance and compliance with NFPA, OSHA, EPA, ACA, and government agency requirements;
- undergoes a hazard assessment every three years conducted by professional engineers to review the soundness of the physical plant, utilities systems, fire and natural disaster resistance; and
- undergoes a comprehensive life-safety inspection conducted by the appropriate State Fire Marshal's office at least annually.

Maintenance workers at Broward Transitional Center



Employees of the Western Region Detention Facility - San Diego



PREA (PRISON RAPE ELIMINATION ACT)

GEO has zero tolerance for all forms of sexual abuse and sexual harassment in our facilities and programs. It is our policy that sexual conduct between employees, volunteers, or contractors and the individuals in our care, regardless of consensual status, is strictly prohibited and subject to administrative and criminal disciplinary sanctions.

Since January 2013, facilities within each GEO division are expected to strictly follow and comply with Section 28 C.F.R. Part 115 of the Department of Justice's (DOJ) Prison Rape Elimination Act National Standards or 6 C.F.R. Part 115 of the U.S. Department of Homeland Security's (DHS) Standards to Prevent, Detect and Respond to Sexual Abuse and Assault in Confinement Facilities.

The "PREA" Program is supported in multiple ways, including corporate and third-party oversight, training for and communication to all employees and individuals, and thorough investigation of all allegations. Dedicated PREA administrative staff at GEO's corporate, regional and facility level are responsible for all aspects of the PREA Program compliance.

All GEO facilities subject to PREA standards must be audited at least once during a three-year audit cycle to be considered compliant with those standards, with at least one-third of each facility type audited each year of the three-year audit cycle. Each facility seeking PREA compliance is responsible for retaining a third-party U.S. Department of Justice-Certified Auditor to conduct audits during the three-year compliance cycle.

VULNERABLE INDIVIDUALS

GEO utilizes 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.

Special needs individuals may include those suffering from substance abuse, those who are emotionally disturbed or mentally/developmentally disabled, and those who pose a high risk or who are determined to require placement in protective custody.

Individuals are classified to the most appropriate level of security and programming both upon admission to the facility and upon any subsequent review of their status. 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.

In instances where our government contracts require males and females to be housed at the same facility, GEO's policies ensure that individuals of different genders are housed in separate housing areas. These policies dictate strict physical and verbal separation and often with no visual contact as well. All procedures are developed and executed consistent with government agency policies and requirements. They are also based on security considerations, the physical layout of the facility, and daily facility schedules including meals, recreation, medical care and general movement.

RESTRICTIVE HOUSING UNIT (RHU) POLICIES

GEO has 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.

Individuals who pose a threat to others, when necessary to ensure their safety, are removed from the general population and placed temporarily in restrictive housing.

Graceville Correctional and Rehabilitation Facility



Facility-specific written policies and procedures are in place governing the admission, operation, supervision and release of individuals in special management housing or restrictive housing including administrative status, protective custody and disciplinary restriction.

A written, individualized plan is created whenever a person is placed in restrictive housing and reviewed with the individual by locally designated professional staff. The plan is designed to return the individual to less restrictive conditions as promptly as possible. A multi-disciplinary staff committee at each facility reviews the progress of every individual against that person's individualized plan on a weekly basis at a minimum. The physical, behavioral, and mental health of each individual is assessed on a constant basis.

SUPERVISION IN RESTRICTIVE HOUSING UNITS (RHU)

GEO staff provide regular supervision in Restrictive Housing Units in order to permit security officers to hear and respond promptly to any emergency. 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, 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, and/or mental health issues, including despair, anxiety, depression, fear, thoughts of self-harm and suicidal ideation.



Healthcare staffing at GEO's ICE processing centers is approximately double that of GEO's state correctional facilities. The additional healthcare staffing is needed to provide appropriate treatment for individuals who have numerous health and mental health needs due to arriving from countries with limited healthcare services.

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

According to statistics from the U.S. Department of Justice, the mortality rate in state correctional facilities averages 17 per 100,000 inmates. In the federal prison system, the average mortality rate is 10 per 100,000 inmates. By comparison, the mortality rate at ICE processing centers is significantly lower at less than one per 100,000 individuals.

GEO-provided healthcare services are under the oversight of the GEO Healthcare Division located in our Corporate Headquarters. The division is led by a Chief Medical Officer with four decades of experience in clinical medicine and is supported by 21 subject matter experts in correctional healthcare, dental services, mental health services, quality control, administration, off-site healthcare claims management, and clinical care support.

The GEO Healthcare Division monitors clinical outcomes, special incidents, clinical encounters, outside patient care, medication management, updates to clinical guidelines, and staffing needs and vacancies.

For all facilities at which GEO provides health services, local oversight and support for healthcare is 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.

Our security staff are also trained to manage an urgent/emergent health situation when healthcare staff may not be available, in accordance with GEO's policies and well-defined procedures.

Initial screening for medical, mental health and dental care is to be completed as soon as possible after intake, and generally within 12 hours of reception at our facilities. Those who are identified as most seriously ill are then prioritized for immediate clinical evaluation.

Our goal is for full healthcare exams to be conducted by a qualified Physician, Nurse Practitioner, Physician Assistant or Registered Nurse within 14-calendar days following admission. Based on the results of the full medical examination, diagnostic and therapeutic plans, for any identified conditions, are then developed clinically.

GEO Physician at Broward Transitional Center



GEO SECURE SERVICES 2019 MEDICAL STATISTICS

Intake Health Screenings	165,602
Physical Exams	108,346
Chronic Care Visits	98,988
Off-Site Consultations	21,641
Sick Calls	290,994
Dental Visits	88,347
Mental Health Visits	172,251

**The data presented above encompasses GEO Secure Services facilities where GEO and/or its subcontractor, Wellpath, manage medical services.*

All individuals in our care have coordinated access to healthcare services. They are given the opportunity to submit oral or written healthcare requests at least daily. These requests are then picked up each day by healthcare staff and are reviewed and prioritized by qualified healthcare professionals.

All individuals in our care have the right to refuse or question the healthcare they are receiving through an established grievance process. This process is an important component of our Quality Improvement program.

Once a grievance has been submitted and reviewed, the issues raised are evaluated and immediate corrective action is taken if warranted. Face-to-face interviews are often recommended, so problems can be resolved effectively and promptly. The grievance process is carefully explained to all individuals in our care.

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

We take our responsibility to provide prompt and comprehensive health and mental health care to everyone in our care seriously as evidenced by 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 Leisure and Law Library

In accordance with standards promulgated by our company and our government agency partners, as well as, the American Correctional Association, we facilitate opportunities for those under our care to access leisure and law library services.

Our facilities are equipped with comprehensive leisure and law library resources, including computers or kiosks containing LexisNexis, a legal software application that enables

powerful document and keyword searches to facilitate efficiency and confidentiality. Our libraries generally operate seven days a week, and include additional scheduling during evenings and weekends, which extends library access.

Our libraries are staffed with qualified personnel who provide technical support and manage ordinary maintenance associated with library needs, including LexisNexis software updates, notary services, inter-library loan programs, and replenishing library supplies.

Access to Telephones

GEO ensures every individual in our care is afforded access to telephones, both immediately upon arrival and thereafter following their processing and housing assignment. The contracted telephone carriers are generally arranged by our government agency partners, who negotiate the rates for use of telephone services. Where standardized telephone carriers are not established by our government agency partners, GEO will enter into similar agreements with contracted telephone carriers.

Our housing areas are equipped with banks of telephones, most of which have attached privacy panels or full privacy enclosures. We 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. We prominently display contact numbers for a variety of entities, including our government agency partners, consulates (free of charge), legal advocates, legal rights groups, legal support services, PREA assistance and a 24/7 hotline.

Phone Banks at Northwest ICE Processing Center



In March of 2020, with the suspension of in-person visitation due to the COVID-19 pandemic, we worked with our government agency partners and phone service providers to provide limited free phone calls and increased minutes, as well as increased video visitation capabilities, where possible, to the individuals in our care.

Access to Attorney Visits

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.

In many jurisdictions, depending on rules set by our government agency partners, legal representatives are not required to be the assigned attorney on record to meet with individuals in our care. With notice and when reasonably practical, GEO will also accommodate attorney requests to meet with their clients outside of normal hours.

Access to ICE Case Officers in ICE Processing Centers

U.S. Immigration and Customs Enforcement (ICE) Processing Centers are designed and built in strict adherence with ICE Building Standards, which generally include a substantial area for ICE onsite personnel responsible for contract oversight, as well as, ICE agents designated as case officers.

In addition to meeting face-to-face with individuals in our care on a scheduled basis, onsite ICE case officers have a secured mailbox within each housing area whereby any resident can submit a request to meet with his or her assigned ICE case officer outside of the regular schedule.

In circumstances where an ICE Processing Center does not have onsite case officers, regularly scheduled visits by offsite ICE case officers are conducted. In addition, a secured mailbox designated for ICE correspondence is available in all housing areas and is processed daily.

Residents can also initiate a request to a GEO case manager or supervisory manager for assistance in contacting ICE case officers.

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. Our facility handbooks are intended to augment the orientation received upon arrival. These handbooks are printed in English and Spanish, with availability of translation services for those who speak a native language other than the two languages used for the printed material.

Access to Translation Services/ Language Line

GEO facilities have a diverse workforce often with bilingual staff members. In our ICE 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. These language lines are available at all times. They are commonly used when communication barriers cannot be overcome with staff translators, or when requested by our residents, or individuals representing them.

Access to Free Consulate Calls

GEO recognizes the importance of 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 generally 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 and 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.

Social support is critical in all our lives, and we strive to reduce barriers so that support systems remain intact for those in our care. All individuals have access to telephones, banking, visitation, mail services, writing materials, and access to volunteers and support organizations.

GEO provides a welcoming environment for all friends and family. Family and friends are accommodated throughout their visit. 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. Individuals who do not receive visitors are able to connect with family members through telephone calls and mail, and in some instances, through virtual visits via Wi-Fi tablets.

Telephones are available in each housing area so that individuals can maintain contact with family and friends who are not able to visit. Individual accounts are made available for family and friends to provide funding for canteen services, telephone service and other items. 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. Organizations and volunteers are a valuable resource for individuals who do not have family or friends nearby.

Visitation at Moshannon Valley Correctional Center



Visitation at Rivers Correctional Facility



ACCESS TO RELIGIOUS OPPORTUNITIES

We respect the right of everyone in our care to practice and follow the teachings of their faith preferences. Our diligence in the application of best-practices ensures opportunity for individuals to practice, assemble, choose religious dietary options, and have access to religion-specific credentialed clergy and spiritual advisors.

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 of necessity 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.

To promote a sense of acceptance and safety within the spaces utilized for religious worship, pictures, icons and other religious paraphernalia unique to any one religion are removed or covered after each service. All the spaces in our facilities that are used for religious worship and instruction are multi-purpose rooms or stand-alone buildings.

The proper practice of any belief system requires a certain amount of educational, doctrinal, devotional, and practical instruction. For this reason, our chaplaincy staff makes faith-specific resources available in print, DVD, CD and video when available.

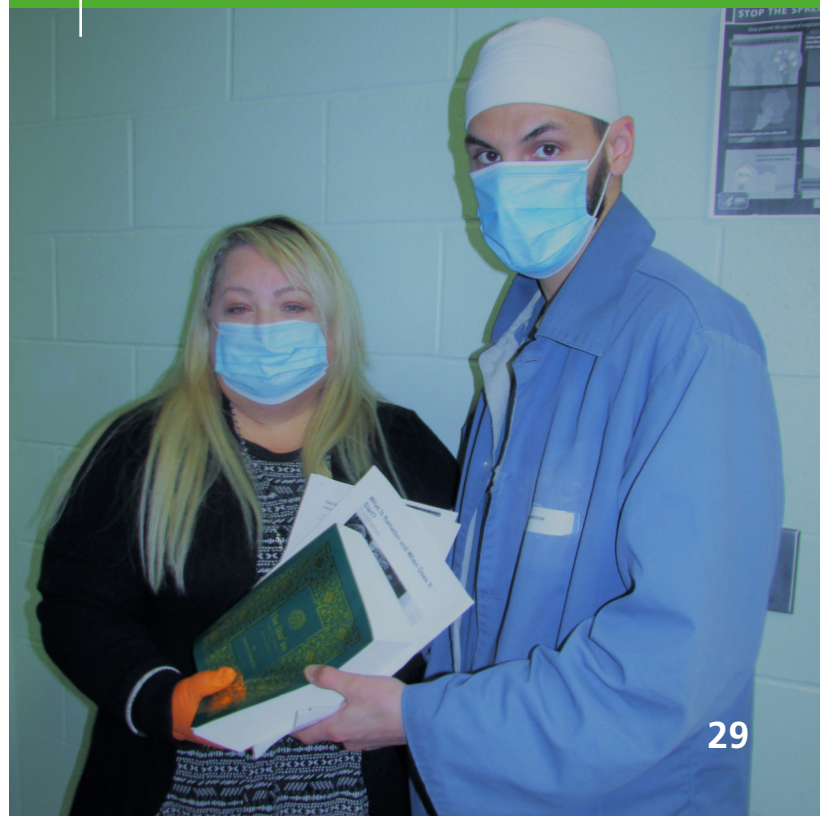
Individuals in our care are encouraged to contact religious organizations directly to request materials on a personal basis. In addition, specific alternate diets are readily accessible to satisfy a religious dietary requirement. Individuals can request alternate diets through each facility chaplaincy program.

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.

Chaplain Hilda Jones



Blackwater River Correctional and Rehabilitation Facility Chaplain provides religious services during the pandemic



ACCESS TO SAFE AND NUTRITIOUS MEALS

Achievement of Successful Health Department Inspections for Facility Kitchens

Facility cleanliness and sanitation is a continuous objective. GEO Food Service areas are systematically inspected by food service staff. 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 (e.g., public health, OSHA). The food service areas in our facilities are frequently audited by regulatory agencies and our government agency partners.

Successful Annual Facility Drinking Water Inspections by Governmental Entities

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 and Protection Agency. These reports reflect the compliance of drinking and wastewater with all applicable regulations and standards.

Specifically, these reports provide information relating to where the water comes from, the list and levels of regulated contaminants, any potential side effects and a comparison against national standards. These evaluations ensure we are providing safe and clean water.

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 at a minimum 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 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. Certifications must be obtained within 30 days of hire.

GEO Food Services Staff at Broward Transitional Center



ACCESS TO RECREATIONAL AMENITIES

We respect the right of everyone in our care to maintain good health through participation in suitable recreational activities. Recreational amenities and activities can serve not only to enhance physical and mental health, but also help to establish healthy interactions and social connections.

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. Indoor activities and tournaments are available daily. 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. In addition, many of the television sets are equipped with individual tuner-capability through headsets. This technology enables several TV screens to be tuned to different channels simultaneously, thereby allowing for choice in programming that can be watched without distracting others in the same housing unit or day room.

We provide gender and age responsive outdoor and indoor activities that promote life balance and recognize cultural diversity.



Broward Transitional Center Exercise Equipment



Rivers Correctional Facility Indoor Basketball Court



Broward Transitional Center Soccer Field

ACCESS TO REHABILITATION PROGRAMS

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

Several years ago, GEO conducted an assessment of the company's government agency partner objectives, organizational resources, financial strengths, and reached the conclusion that we could do more for the individuals under our care.

We noted that we were organizationally and financially successful in providing secure residential care in GEO Secure Services facilities for over a quarter of a million individuals annually. We decided there was more that we could do and should do. Out of this self-assessment came the GEO Continuum of Care® enhanced offender rehabilitation program.

What started as an innovative concept a few years back has been continually expanded and is now being implemented at 20 GEO facilities in the United States.

For 2020, GEO has committed \$14 million in company funding for the GEO Continuum of Care® (CoC) Program.

The CoC Division at our Corporate Headquarters is comprised of approximately 50 subject matter experts in offender rehabilitation, education, cognitive behavioral treatment, substance abuse treatment, case manager training, program quality assurance, and post-release services.

Our GEO Continuum of Care® provides enhanced in-custody rehabilitation programs including cognitive behavioral treatment, integrated with post-release support services. The goal of our in-custody programming is to facilitate a successful transition by the individuals in our care into a crime-free daily life in their communities.

\$14M

committed in company funding for GEO Continuum of Care® Program



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 Smart-Board 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 needs upon their release back into the community, including clothing, food, housing, employment, and transportation assistance.

**PROGRAMMING OPPORTUNITIES
AT ICE PROCESSING CENTERS**

Although the CoC Rehabilitation Programs are not applicable to ICE 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 ICE
PROCESSING CENTERS**

In recent years, various aspects of the Voluntary Work Program in effect at all ICE Processing Centers 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 ICE 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 **ICE performance-based standards** under President Obama’s Administration. A copy of the federal government’s Performance-Based National Detention Standards for the ICE Voluntary Work Program can be found at [ice.gov/doclib/detention-standards/2011/5-8.pdf](https://www.ice.gov/doclib/detention-standards/2011/5-8.pdf)

Participation by detainees 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 sets payment rates. All payment rates associated with this federal government program are stipulated under long-established 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 Group 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 ICE Processing Centers we manage, 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 ICE Processing Centers on demand, upon request, and free of charge, including:

- Tooth paste
- Tooth brushes
- Shampoo
- Bar Soap
- Lotion
- Razors
- Combs
- Hair Ties
- Toilet Paper
- Feminine Products

Delivering on our commitment to respect Human Rights. The ICE Processing Centers we manage deliver high quality food services with three daily meals, free of charge, based on menus which address a variety of dietary preferences, allergies, and needs. These menus are reviewed and approved by a registered dietitian and ICE 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 domestic operations. The Contract Compliance Division reports directly to the Chairman and Chief Executive Officer. As detailed here, the Contract Compliance Division performs audits of GEO facilities, and of the key metrics related to GEO's commitment to human rights.

Based out of GEO's Corporate Headquarters, the Contract Compliance Division is led by an Executive Vice President and Vice President, each with over 20 years of legal, compliance and law enforcement experience. They are supported by 42 subject matter experts in security, medical, American Correctional Association accreditation, the Prison Rape Elimination Act, The Joint Commission, National Commission on Correctional Health Care, ICE's Performance-Based National Detention Standards, DOJ's Federal Performance-Based Detention Standards, and multiple other agency standards.

Contract Compliance personnel are located at the Corporate Headquarters, each GEO Regional Office, and other key locations. The Contract Compliance Division provides ongoing compliance oversight with in-depth reviews and audits conducted monthly, quarterly, and annually, as well as on an ad hoc basis.

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.

GEO's Contract Compliance and Quality Control Program is embedded throughout the entire operation with corporate, regional, and facility support staff having distinct roles in the oversight and review process.

For the operation of facilities dedicated to U.S. Immigration and Customs Enforcement, GEO has developed a comprehensive Quality Control Plan, which is reviewed and approved by U.S. Immigration and Customs Enforcement for each contracted location. These plans ensure our operations follow the 2011 Performance-Based National Detention Standards, including the 2016 revisions, court orders, American Correctional Association standards, National Commission of Correctional Health Care standards, and specific customer and corporate policies.

GEO conducts audits, verifying ICE's standard requirements and other contract criteria are consistently met, and to identify opportunities to exceed requirements in a manner beneficial to all those in our care.

We operate each of our facilities in compliance with governmental standards, national accreditation and certification guidelines, as well as the requirements of our government agency partners.

GEO's commitment to human rights and the effective implementation of our Global Human Rights Policy is reinforced by our Quality Control Program, which includes systematic monitoring, facility audits, program reviews, regular reviews of policies and procedures, and the development of corrective action plans.

The mission of our Quality Control Program is to evaluate operational performance and compliance with our policies, management contracts, and applicable standards while identifying opportunities for enhancement. Implementation is the responsibility of our Contract Compliance Division, which is independent of the company's other business and operational areas. 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

The application of quality control measures in all aspects of our operations includes processes to identify human rights risks and implement related remediation. Notably, the Quality Control Program 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, DOJ’s Federal Performance-Based Detention Standards and, for ICE Processing Centers, the federal government’s 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.

which are completed by our Contract Compliance department – focus on non-compliant findings and advised items from the prior year’s corporate audit, internal facility audits, and any government agency findings. Furthermore, Contract Compliance conducts ad hoc audits when needed to address any findings identified in intervening government audits, and/or internal audits. Finally, Contract Compliance conducts PREA and ACA audits and mock audits where applicable.

Audit teams are chaired by Contract Compliance directors or managers with team members selected by the audit chair and approved by the appropriate Contract Compliance director. Team members are Contract Compliance department staff and/or subject matter experts from our facilities and/or corporate headquarters.

GEO SECURE SERVICES – U.S. AUDIT ACTIVITY: 2017 - 2019

	2019	2018	2017
Total Active U.S. Secure Facilities	67	63	63
Internal GEO Contract Compliance Audits Completed*	124	142	123
Government Customer Audits Completed	41	69	96
Third-party Inspections Completed	19	47	44

**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

Generally, GEO audits cover a one-year period between the last and the current audit dates. Internal audits are conducted by facility staff at a pre-determined frequency. Follow-up audits –

GEO AUDIT CATEGORY	Human Rights Related Questions
Food Service	114
Physical Plant	246
PREA	132
Admission, Orientation	123
Law Library/Courts	84
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	434
Recreation Programs	70
TOTAL	2,287

GEO’s Contract Compliance audit tools are used to review every aspect of a facility’s operations, 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 and include one or more questions in 20 separate categories. The recent increase in the number of audit questions related to human rights described in this year’s report versus that of prior years reflects the diligence of our efforts to capture comprehensive information as part of GEO Group’s ESG process. A key element of our Quality Control Program involves training the quality assurance staff at each GEO facility on the Quality Control Program, audit practices and processes, the contract compliance database, ACA standards and accreditation, and PREA requirements and certification. This training is conducted on-site and remotely to update facility staff on new requirements and standards, address deficiencies, and to respond to requests from facility staff.

GEO’S EFFORTS TO SUSTAIN COMPLIANCE IN SUPPORT OF CRITICAL 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. The workshop consists of meetings to focus on non-compliant items and to ensure the facility’s leadership has a clear understanding of the audit results. Time-sensitive corrective action plans are drafted during the workshop to bring non-compliant items into compliance as soon as practicable.

Benefits of the workshop include:

- Continuing the audit momentum to focus on the non-compliant findings and create “buy in” for grass-roots solutions that can be implemented quickly;

- the local compliance staff members have the attention and support of facility leadership to focus other department heads to develop corrective actions that address the “root cause” of non-compliant findings;
- ownership at every level to address any findings, with the workshop creating a forum for discussion of complex or recurring issues;
- each facility receives the benefit of Contract Compliance expertise, perspective, and sharing of best practices from other facilities.

Corrective action plans are drafted with a focus on the problem, the details of the non-compliant results, an identification of remedial strategy, and a clear plan regarding 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.

Following an audit, an executive summary, including auditor observations and impressions, as well as the audit’s findings are prepared by Contract Compliance staff and distributed to facility administrators, regional administrators, and GEO Corporate leadership. Monthly department reports are compiled summarizing the previous month’s activity and noteworthy occurrences, and these reports are distributed broadly to GEO senior leadership.

A critical element of GEO’s Quality Control Program is the follow-up audit. These audits are conducted to specifically review non-compliant and advised items from the last annual corporate audit, internal facility audits and every non-compliant finding from government agency audits.



INDEPENDENT VERIFICATION OF GEO PERFORMANCE

Contracted facilities operate with significant levels of accountability and transparency.

Unlike government-run facilities, GEO believes that contracted facilities provide greater accountability because they are governed by detailed operating contracts and often have on-site, full-time government contract monitors who are employed to oversee the daily compliance of the contract requirements.

We recognize that external oversight is an important part of the process that holds us accountable as a services provider, and verifies our efforts to protect the health, safety, and rights of persons entrusted to our care.

In addition to our comprehensive Contract Compliance 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.

State Facilities

Our State government partners have monitors (in most cases on-site) assigned to each facility, to oversee daily operations and the quality of services delivered. Most states conduct at least one comprehensive annual audit that may focus on all facets of a facility or specific disciplines.

U.S. Immigration and Customs Enforcement (ICE) Facilities

GEO has been a long-standing service provider to the federal government and U.S. Immigration and Customs Enforcement (ICE) dating back to the mid-1980s. All of GEO's ICE Processing Centers operate in accordance with ICE's Performance-Based National Detention Standards (inclusive of any applicable waivers), established under President Barack Obama's Administration.

ICE Processing Centers have full-time, on-site contract compliance monitors. ICE also has a structured Quality Assurance Surveillance Plan that includes audits by ICE's Enforcement and Removal Operations and ICE's Office of Professional Responsibility's Office of Detention Oversight. ICE uses subcontractors to perform an

annual assessment using the Performance-Based National Detention Standards. In many locations, ICE has stationed law enforcement and mission support personnel in office space that is adjacent to office space utilized by GEO staff.

The Performance-Based National Detention Standards reflect ICE's continuing efforts to create an environment for immigration detainees that reflects the unique purpose of immigration detention. The performance-based standards were developed under President Obama's Administration with the objective of improving medical and mental health services, increasing access to legal services and religious opportunities, improving communication with individuals with limited English proficiency, improving the process for reporting and responding to complaints, and increasing recreation and visitation.



In 2016, ICE revised a number of the performance-based standards to ensure consistency with federal legal and regulatory requirements, as well as prior ICE policies and policy statements. The Performance-Based National Detention Standards located on ICE's website, <https://www.ice.gov/detention-standards/2011>, represent the updated version of the standards.

In addition, GEO generally provides permanent office space for hundreds of ICE personnel, immigration attorneys, immigration court judges, and other federal government officials.

U.S Department of Homeland Security (DHS)

DHS also conducts audits at ICE Processing Centers to review conditions and provisions for detainee rights. These audits are performed by representatives from the DHS Office for Civil Rights and Civil Liberties and the DHS Office of the Inspector General.

United States Marshals Service (USMS)

United States Marshals Service (USMS) conducts an annual Quality Assurance Review (QAR) at facilities with federal inmates under their jurisdiction. The QAR examines all aspects of services utilizing the Federal Performance-Based Detention Standards to measure performance on an annual basis. USMS has assigned on-site monitors to observe and review contract compliance.

The USMS modeled its Federal Performance-Based Detention Standards on the American Correctional Association’s Standards. The USMS Prisoner Operations Division and district offices use these standards to review non-federal facilities that house USMS detainees. The standards are designed to confirm that the facilities are “safe, humane, and protect statutory and constitutional rights.”

Federal Bureau of Prisons (BOP)

The Federal Bureau of Prisons (BOP) has full-time onsite monitors to oversee daily operations and contract service provisions. The BOP conducts an annual Contact Facility Monitoring audit at each facility housing federal inmates under their jurisdiction as part of their Quality Assurance Program to assess contract performance. Compliance with the BOP’s “Program Statements” is also a critical part of GEO’s auditing process. The BOP requirements are carefully detailed in its program statements and GEO works to meet each applicable standard.

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. GEO facilities are subject to oversight by the Department of Homeland Security (DHS), DHS

Office of Civil Rights and Civil Liberties, and the Department of Justice Office of Inspector General (DOJ-OIG). The DOJ-OIG conducts audits at facilities that house both USMS detainees and BOP inmates.

GEO facilities also may have oversight from state and local organizations that review food service operations for safety and sanitation, fire safety, and emergency preparedness.



U.S. Immigration and Customs Enforcement



GEO'S CONTRACT COMPLIANCE AUDIT PROCESS

GEO's Contract Compliance audit teams generally travel to each of our facilities across the country to conduct three-to-four-day annual reviews. The teams include three to eight operational and subject matter experts who review all standards applicable to each specific facility or site. In addition to the annual reviews conducted at all GEO facilities, the Contract Compliance team reviews and acts upon findings from separate government-conducted audits and ongoing monitoring activities.

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 Department 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 questions that 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 Department's database, analyzed and shared with all levels of GEO's management to identify trends and potential opportunities for improvement.

Continuous Improvement

At year-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, as well as 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 Department audits all aspects of health care treatment provided at GEO Secure Services facilities and applicable Reentry facilities in the U.S. to assess the quality of each facility's health care program, identify improvement areas, and assist in developing effective corrective action plans. The team is led by a Corporate Director and a Corporate Manager; both of whom are medical doctors with more than 50 years of combined operational experience.

COMPLIANCE TRAINING

The GEO Contract Compliance department has a dedicated team responsible for the training of new compliance staff at each facility across all GEO divisions. This team was established to provide a consistent message and level of training to all facility compliance staff. The training program includes topics such as Quality Control Program procedures, auditing techniques, policy writing, and corrective action plan development.

Annually, the Contract Compliance department makes training available to compliance staff via an electronic learning management system. Training topics vary from year-to-year and may include goal setting, policy writing, and effective time management.

GEO has consistently received a rating of "Exceeds Standard" during PREA certification audits for standard 115.31 "Employee Training." All employees receive initial and annual refresher training that includes, but is not limited to: GEO's zero-tolerance policy towards sexual abuse and harassment; reporting requirements; communicating effectively and professionally with individuals in GEO facilities, including LGBTQ individuals; how to avoid inappropriate relationships with individuals in a GEO facility; and the detection and response to signs of threatened and actual sexual abuse.

THIRD-PARTY ACCREDITATION ENTITIES

In addition to complying with the standards established by each of our government contracting agencies, GEO adheres to operational standards promulgated by several leading third-party accreditation organizations and opens its facilities to inspection and review by these associations, commissions, and councils.

As a matter of policy, all GEO facilities are designed and operated in general accordance with the guidelines of one or more of the following organizations or protocols:

- American Correctional Association (ACA);
- Prison Rape Elimination Act (PREA);
- National Commission on Correctional Health Care (NCCHC);
- The Joint Commission (TJC);
- International Organization for Standardization (ISO);
- Australian Council of Health Care Standards (ACHS);
- AdvancED;
- Commission on Accreditation of Rehabilitation Facilities (CARF);
- Southern Association of Colleges and Schools (SACS); and
- Correctional Education Association (CEA)

ACA ACCREDITATION

We have been an active participant of the American Correctional Association (ACA) since our company’s founding. Through its independent accreditation process, ACA encourages best practices in the management and operation of correctional and rehabilitation facilities and processing centers.





Contract Compliance Staff at the 2019 ACA Conference

WHAT ARE ACA’S STANDARDS?

Since their inception, the ACA standards have served to establish a fundamental operational structure for the facilities and agencies that have implemented them. ACA standards interface with all aspects of operations, including safety, security, order, care, programs, justice, and administration, among others.

While ACA standards provide guidelines for these areas and require the existence of some specific practices or conditions, they are designed to facilitate the development of independent agency policy and procedure that govern the agency’s everyday operations.

Since the mid-2000s, ACA standards have gradually migrated to a “performance-based” model in which agencies collect, track, and analyze internal outcomes related to each standard in order to gauge their performance and adjust their operations accordingly. This model has proven to be a successful method of improving agency operations through the use of real-time data with an immediate and significant impact on inmates, staff, and administrators throughout the facility or agency.

ACA standards guide operations in every area of the facility or agency. Secure facilities such as jails and prisons must operate effectively as self-contained communities in which all necessary goods and services are provided in a safe, secure, and controlled manner.

ACA standards relating to safety require adherence to all federal, state, and local fire and safety codes; emergency planning and preparation; and the provision of related training and materials for staff and inmates. Security standards mandate inspections and training of all firearms and armed officers; visitor and staff searches and tracking procedures; and inmate counting and tracking procedures.

Other sections throughout each ACA manual regulate policy, procedure, and practice at a similar level for other institutional or facility activities. (Source: ACA)

We are committed to achieving ACA accreditation at all GEO Secure Services facilities and all applicable GEO Reentry facilities.

We facilitate the accreditation process by having a Contract Compliance Director and Manager of Accreditation to:

- assist facility staff in the preparation of preliminary documents for submission to ACA and provide training to executive staff and department heads;
- participate in a physical plant inspection to determine physical operational issues related to ACA standards;
- provide technical assistance in preparation of ACA audit files and ACA standard interpretation(s);
- collect information to assist the facility and perform status checks on ACA file preparation and completion;
- conduct an ACA mock audit;
- be involved in the review and submission of the annual certification reports to ACA;
- attend the facility’s ACA audit; and
- organize panel hearing presentations and assist during hearings.

As a result of this preparation, 69 GEO facilities have achieved ACA accreditation with an average accreditation score of 99.71%. ACA scores for GEO facilities can be found on GEO’s website at [geogroup.com/Industry_leading_Standards](https://www.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 developed a strong compliance process for facilities that fall within the scope of the Prison Rape Elimination Act of 2003 (PREA).

The majority of GEO facilities fall under either Section 28 C.F.R. Part 115 of the Department of Justice’s Prison Rape Elimination Act National Standards or 6 C.F.R. Part 115 of the U.S. Department of Homeland Security’s Standards to Prevent, Detect and Respond to Sexual Abuse and Assault in Confinement Facilities.

GEO’s PREA policy is available for public inspection on the company’s website at geogroup.com/PREA

GEO has a dedicated PREA Coordinator, a director-level position reporting to the Executive Vice President of Contract Compliance and the Vice President of Contract Compliance. This Director oversees the implementation of PREA monitoring systems and policies for GEO facilities. GEO’s PREA Director and individual Contract Compliance Managers:

- develop policies and procedures relating to and implementing PREA standards and compliant investigative practices;
- provide resources and guidance on PREA issues;
- coordinate and direct the certification process, including facility preparation and pre-audit preparation file review;
- review investigative files and practices;
- collect data and prepare reports as required;
- develop PREA-specific audit tool questions for internal and annual auditing;
- prepare each facility for certification review; and
- assist in investigations of PREA incidents and conduct mock audits.

Currently, GEO has 95 facilities certified under either the Department of Justice’s or Department of Homeland Security’s PREA regulations.

National Commission on Correctional Health Care (NCCHC) Accreditation



The NCCHC is a national, non-profit organization originally established by the American Medical Association to develop and promote national standards of healthcare in correctional and detention settings. Although GEO facilities already comply with ACA healthcare standards, many GEO facilities also obtain NCCHC accreditation at the request of our government agency partners. The NCCHC conducts audits of immigration processing centers and correctional facilities every three years.

Currently, GEO has 15 secure services facilities accredited by the NCCHC, including 10 immigration processing centers for which GEO provides health care services.

The Joint Commission Accreditation (TJC)



For those GEO facilities that house inmates on behalf of the Federal Bureau of Prisons, GEO obtains healthcare accreditation under The Joint Commission. As an independent, non-profit organization, The Joint Commission accredits and certifies nearly 22,000 health care organizations and programs in the United States. This organization offers accreditation to a variety of organizations, including hospitals, medical practices, out-patient surgery centers, residential facilities, and behavioral treatment facilities. The Joint Commission conducts audits of correctional facilities every three years.

CREATING OPPORTUNITIES: DEVELOPING OUR PEOPLE



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 18,837 U.S. employees, 51% are female.** Women account for 56% of our corporate employees, 41% of our facility security staff, and 34% of those serving in management positions as directors and above. We also continue to recruit women to our workforce, with women comprising 56% of GEO’s new hires in 2019.

Women are also involved at the highest levels of our organization. Of the seven members of GEO’s Board of Directors in 2019, two are women. In 2018, the organization 2020 Women on Boards recognized GEO Group as a Winning Company for its commitment to board diversity. Winning Companies champion board diversity by having 20% or more of their board seats held by women. This marked the fourth consecutive year in which GEO had been recognized by 2020 Women on Boards, whose goal is to increase the percentage of women on all corporate boards to 20 percent by 2020.

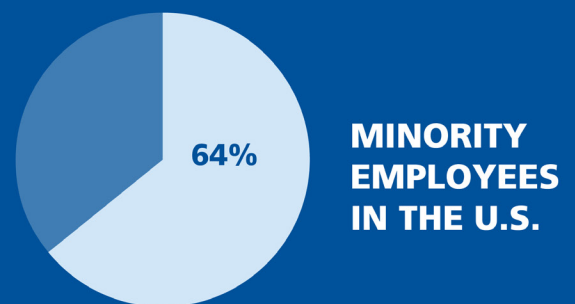
In all areas of our business, GEO strives to achieve wider racial and ethnic diversity. In 2019, two of our board seats were held by members of minority communities. Across our organization, under-represented minorities of the United States of America – including African Americans, Hispanic and Latino, Asian, Pacific Islander, Native Hawaiian and Native American/Alaskan – currently account for 64% of our U.S. employees.

Minorities comprise 42% of GEO’s corporate workforce, 70% of our facility security staff, and 29% of those serving in management positions as directors or above.

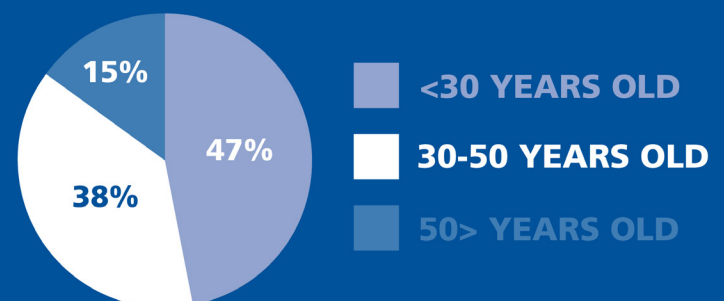
GEO’s employee population is also diverse by age. Of new hires in 2019, 46% were under age 30, 38% were between ages 30 and 50, and 15% were age 50 and older.

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

GEO’S WORKFORCE STATISTICS:



NEW HIRE EMPLOYEE AGES



EMPLOYEE DIVERSITY

U.S. Based Employees	2019	2018	2017
Total of all GEO U.S. Employees	18,837	18,427	18,044
% of all U.S. Employees - Women	51%	50%	49%
% of all U.S. Employees - Minorities*	64%	63%	60%
% of Board of Directors - Women	25%	33%	33%
% of Board of Directors - Minorities	25%	33%	33%
% of Management Positions - Directors or Above - Women	34%	31%	27%
% of Management Positions - Directors or Above - Minorities	29%	28%	28%
% of Corporate Employees - Women	56%	58%	57%
% of Corporate Employees - Minorities	42%	38%	38%
% of All GEO Security Staff-U.S. (includes Transportation) - Women	41%	41%	39%
% of All GEO Security Staff-U.S. (includes Transportation) - Minorities	70%	68%	66%
% of all U.S. Employees - Veterans	11%	10%	10%

NEW HIRES

% of New Hires - Under Age of 30	47%	37%	38%
% of New Hires - Age 30-50	38%	49%	48%
% of New Hires - Over Age 50	15%	14%	14%
% of New Hires - Women	56%	53%	52%

[*] Includes Hispanic/Latino, Black/African American, American Indian/Alaska Native, Native Hawaiian/Pacific Islander, Asian, and two or more races.



2019 Diversity in Leadership Award Recipients

Melita R. Wilson – PREA (Prison Rape Elimination Act) Investigator at Broward Transitional Center

Melita holds several titles in addition to her official role as Investigator at the Broward Transitional Center. They include Prison Rape Elimination, Sexual Abuse and Assault Prevention and Intervention Subject Matter Expert (also known as PREA SAAP SME traveling auditor), alternate Disciplinary Hearing Officer (DHO), alternate Grievance Officer, facility trainer, new hire mentor and CPR trainer. Her position as Investigator is vital to the facility's operation; it requires constant monitoring and conducting daily assessments of everything and anything related to the Prison Rape Elimination Act.

Ms. Wilson pays it forward by volunteering at several civic and charitable organizations in her community and actively contributing her leadership support. Bringing her passion to listen and advise, she currently serves on the fundraising committee for Kids in Distress, Toys for Tots and the local Rotary Club. In addition, she serves as an advocate in several local senior centers.

Throughout the Broward County, Florida community, Melita is widely acknowledged as an engaged and effective leader, mentor, and coach, who honed her leadership skills by making her way through the ranks. Today, she consistently leads by example and uses her ability to empower and motivate others within and outside the organization to do the same. These qualities have produced results for the residents, staff and her inner circles who speak to her exceptional character.



Deborah S. Gatling – Executive Secretary at Rivers Correctional Facility

Ms. Gatling personifies the meaning of diversity and leadership as evidenced by her stellar performance with staff at the facility, the GEO Corporate office, and onsite Federal Bureau of Prisons personnel. Furthermore, she has built essential relationships with local community leaders in the North Carolina Department of State for the Northeastern Division where she serves as a Notary Public Instructor. She also teaches classes at Roanoke-Chowan Community College, Martin, Beaufort and Pitt Community Colleges and the College of the Albemarle.

Deborah serves as a mentor for new staff, meeting with each individual on a weekly basis to monitor their progress. This mentorship is in addition to other mission-critical duties at the facility. Trained and certified as a Mentor, she holds a certification in Paralegal Studies.

Additionally, Ms. Gatling exhibits exemplary community service in several vital capacities. Along with everything she does for GEO, she still makes the time to serve as a Chaplain for Chaplains International Association, Virginia Beach; sit as a board member for Transformational Bible Institute and West Roanoke Missionary Baptist Association; and serve as a Youth Pastor, Vacation Bible School Director and Sunday School Instructor for her community and three other churches in Hartford County. Through all of these good deeds, not only has she gained the admiration and support of the lives she has impacted, but she also has built many trusted relationships along the way.

RECRUITING U.S. MILITARY VETERANS

We are honored by the fact that many veterans of the U.S. military 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. On numerous occasions, GEO Group has been recognized by U.S. Veterans Magazine among its "Top Veteran Friendly Companies." Most recently, we were recognized as one of the "Best of the Best 2020" Top Veteran Friendly Companies in the Fall 2020 Edition of U.S. Veterans Magazine. More than 2,000 U.S. military veterans currently work at GEO Group, accounting for 11 percent of the company's U.S. employees.

More information regarding GEO's hiring practices and commitment to workforce diversity can be found on our website geogroup.com/embracing-diversity-inclusion

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.

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
- Dental
- Medical and Prescription Drug coverage
- Vision
- Short- and Long-term Disability
- Employee Assistance Program
- Tuition Reimbursement
- Voluntary Accident Insurance
- Legal and Identity Theft Protection Plans
- Paid Holidays
- Basic, Additional, Spousal and Dependent Life Insurance
- Health and Dependent Care Flexible Spending Accounts
- 401(k) Retirement Plan
- Voluntary Whole Life Insurance
- Voluntary Critical Illness Insurance
- 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. 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.

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

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.

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. 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 Continuum of Care participants.

COC TRAINING AND EDUCATION

	2019	2018	2017
Total Staff Training Hours:	82,080	80,170	46,750
CoC Total Annual Trainings:	342	334	153

GEO REENTRY SERVICES HOST FIRST ANNUAL LEADERSHIP ACADEMY

In 2019, GEO Reentry Services held their first annual Leadership Academy. The Leadership Academy is a program designed to develop the leadership and management skills of GEO Reentry Services employees who demonstrate a potential to assume higher levels of responsibility.

The Leadership Academy combines classroom training, team building, personal study, assigned reading, and mentoring. Participants worked on topics, such as leadership, culture building, creating positive change, effective communication, time management, and presentation skills.

All participants were required to complete a group project and assigned work during the year-long program. Additionally, mentors were assigned to work with participants during the academy sessions, as well as to participate in monthly meetings (conducted remotely) throughout the year. The goal of the program is to develop leaders and build a culture of collaboration, innovation, and growth.

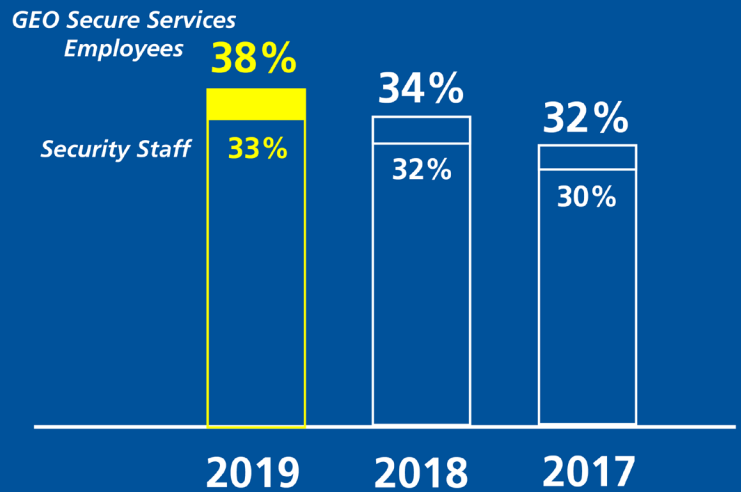
Read more about GEO Reentry Services First Annual Leadership Academy in the 2nd Quarter 2020 GEO World Magazine at [geogroup.com/GEO World](http://geogroup.com/GEO_World)

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.



PERCENTAGE OF UNIONIZED EMPLOYEES (2019-2017)



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 44 of our GEO Secure Services facilities are represented by unions. At those locations, 5,782 employees are represented by unions which accounts for 38% of our GEO Secure Services workforce.

We actively participate in the collective bargaining process, negotiate in good faith and maintain excellent working relationships with each of the unions representing our employees. As a result, over the years, GEO has not experienced any significant or major labor actions, such as strikes or work stoppages.

In the U.S., our employees participate in the following unions:

- International Association of Machinist & Aerospace Workers (IAMAW)
- National Federation of Federal Employees union (NFFE)
- The International Union, Security, Police and Fire Professionals of America (SPFPA)
- National Federation of Federal Employees (NFFE)
- International Brotherhood of Teamsters (IBT)
- National Union of Hospital and Health Care Employees, American Federation of State, County and Municipal Employees (NUHHCE/AFSCME) (1199J)
- American Federation of State, County and Municipal Employees (AFSCME in Illinois)
- Special and Superior Officers Benevolent Association (SSOBA)
- Communications Workers of America (CWA)
- Office and Professional Employees International Union (OPEIU)
- United Government Security Officers of America (UGSOA)
- Delaware County Prison Employees Independent Union (DCPEIU)



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 14 different higher educational 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. Employees who enroll in the program are eligible to receive up to \$3,500 a year in tuition reimbursement.

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.

Throughout our organization, we recognize the needs of employees facing challenging life circumstances and respect their rights under the Family Medical Leave Act (FMLA). In 2019, 1,425 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 law, 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 will not take any action against employees because they have exercised their rights under the law.

In 2019, more than 1,400 GEO employees in the U.S. utilized the Family Medical Leave Act (FMLA).

AMERICANS WITH DISABILITIES ACT (ADA) QUALIFIED



ENSURING SAFETY AND SECURITY



Throughout the United States, GEO oversees the operation and management of 125 secure facilities, processing centers, and community reentry facilities, as well as 66 non-residential reentry programs. We currently employ 18,837 professionals in the U.S. and provide services to more than 250,000 individuals in our care on a daily basis.

The oversight of GEO’s secure facilities in the U.S. is coordinated from three regional offices, located in:

- Charlotte, North Carolina
- San Antonio, Texas
- Los Angeles, California

Each regional office is headed by a Regional Vice President who oversees approximately two dozen experts in security, health services, finance, contract compliance, human resources, and other support services.

The oversight of our reentry centers, non-residential programs, community-based case management, and electronic monitoring services is coordinated by several divisions within our GEO Care business unit: GEO Reentry Services, Abraxas Youth and Family Services, and BI Incorporated.

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 of our facilities. Our responsibilities in these areas, along with those of our employees, are highlighted in section 7 of GEO’s Code of Conduct.



Rivers Correctional Facility,
North Carolina

**SECTION 7 –
GEO’S CODE OF CONDUCT -
HEALTH AND SAFETY**

GEO strives to provide each employee with a safe and healthy work environment. Each employee has responsibility for maintaining a safe and healthy workplace for all employees by following safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions. These requirements extend to all contractors performing work at all GEO facilities.

Violence and threatening behavior are never permitted. Employees should report to work in the condition to perform their duties, free from the influence of illegal drugs or alcohol. The use of illegal drugs in the workplace will not be tolerated. These requirements extend to all contractors performing work at all GEO facilities.

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.

As an established and recognized industry best practice, this comprehensive approach to safety encompasses core management functions, employee responsibility, engagement and communication between management and line staff, safe work methods, hazard analysis and controls, preventative and corrective measures based on investigations and root cause analysis, training programs, internal and external compliance audits and continuous improvement.

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 casualty insurance, risk analytics, and environmental issues. Regional Safety Managers are embedded into our operations throughout the United States and provide hands-on, field support for our facilities.

All facilities in the GEO 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), National Fire Protection Association (NFPA) and Environmental Protection Agency (EPA), along with company and government agency 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. Employees are encouraged to challenge assumptions, investigate anomalies, and consider potential adverse consequences of planned operational actions.

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. Performance assurance activities verify whether regulatory standards and internal governance requirements are being met. Internal processes, procedures, and physical spaces are evaluated daily, weekly, and monthly for workplace hazards and proper sanitation.



Communication and staff engagement:

Frequent, open, and effective communication is an essential component of GEO's EHS program. 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 – all without any fear of retaliation. At the same time, we 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. These facility-level committees are supported by corporate-based committees and convene monthly to conduct reviews of safety activities, policies and procedures, and safety-related incidents for root-cause analysis and to develop corrective action plans.

Each safety committee plays an integral role in assisting the Fire & Safety Managers and facility management teams, in reducing injuries and hazards associated with facility operations. Safety committee membership normally includes a balanced mix of line staff and management to ensure the full representation of all aspects of facility operations.

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. 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.

GEO's internal Continuum of Care Training Institute trains all staff from the time of hire and regularly throughout their employment. GEO's staff development plans include basic training, refresher training, advanced training, skill set certifications, and new manager's training. Staff also receive training on contract-specific requirements, communication and de-escalation skills, self-defense, group facilitation, and our proprietary Case Management System.

In addition, GEO provides training on Evidenced-Based Practices, Motivational Interviewing techniques, and training specific to the types of programs offered to participants in our care.

In 2019, GEO Reentry Services hosted its first annual Leadership Academy. The Leadership Academy is a three-session program designed to develop the leadership and management skills of GEO Reentry Service employees who demonstrate a potential to assume higher levels of responsibility within the organization. More information about the Leadership Academy can be found in [Chapter 7: Developing Our People](#).

ONLINE LEARNING MANAGEMENT SYSTEM

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

Training topics include:

- GEO's Commitment to Human Rights
- Workplace Violence Prevention
- Prison Rape Elimination Act (PREA) Training
- Suicide Awareness and Intervention
- Use of Force Regulations and Procedures
- CPR, AED and Basic First Aid
- Emergency Planning and Response Procedures
- Respiratory Protection
- Hazardous Energy Control
- Fire Protection/Prevention

MAKING AN IMPACT: ADDRESSING RECIDIVISM



2019 GEO
Continuum
of Care Conference

The “GEO Continuum of Care®” division – an innovative and award-winning initiative we piloted in two state correctional facilities starting in 2015 – provides enhanced in-custody rehabilitation programming, including cognitive behavioral treatment, integrated with post-release support services at 18 state correctional facilities and two federal facilities in the United States.

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 resources include 44 facilities with close to 11,000 beds. GEO also operates 66 non-residential day reporting centers.

GEO’s day reporting centers provide on-site cognitive-behavioral treatment and rehabilitation services tailored to participants’ specific criminogenic risks and needs. At these centers, participants receive a continuation of their care, including intensive treatment focused on changing criminal thinking and behavior. At the same time, they are connected with community resources and organizations to enable them to become contributing members of the 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. Every day, more than 30,000 men and women in our facilities participate in evidence-based, in-prison rehabilitation programs. Additionally, through our network of community reentry facilities and day reporting centers in the United States, over 15,000 individuals on a daily basis participate in programs aimed at helping them successfully reintegrate into their communities.

In recognition of the results the GEO Continuum of Care® program has achieved, GEO received the American Correctional Association 2018 “Innovation in Corrections” Award. Our efforts to expand the GEO Continuum of Care® program across the United States underscore our belief, that as a company, we are most effective when those we care for re-enter society as productive and employable citizens.

GEO has published reports on the results of the GEO Continuum of Care® program for each of the past three years. The 2019 GEO Continuum of Care Annual Report can be accessed at [geogroup.com/Portals/0/coc/2019CoCAAnnualReport.pdf](https://www.geogroup.com/Portals/0/coc/2019CoCAAnnualReport.pdf)

GEO’s residential reentry resources include 44 facilities with close to 11,000 beds. GEO also operates 66 non-residential day reporting centers.

Jack Brewer’s American Heroes Business & Leadership Program



2017-2019 GEO CONTINUUM OF CARE (COC) HIGHLIGHTS

POPULATION	2019	2018	2017
Total Eligible Population	69,548	64,620	60,620
Total Program Participants	33,309	31,049	29,214

PARTICIPATION

Total Programming Hours Completed	6,789,417	6,733,045	5,914,071
Total Programming Completions	51,605	44,518	30,814
Behavioral Program Completions	44,715	32,419	23,485
Individual Cognitive Behavioral Treatment Sessions Completed	36,539	16,409	16,409
Average Daily Vocational Attendance	33,033	32,283	24,291
Average Daily Academics Attendance	13,244	13,104	12,210
Average Daily Substance Abuse Attendance	18,038	17,965	4,112
Total Substance Abuse Completions	8,767	8,842	8,412
Total Vocational Completions	9,413	9,131	7,814
Total High School Equivalencies Issued	2,882	2,779	2,615
Average Program Participation Hours per Participant	204	216.8	202.5

POST-RELEASE SUPPORT SERVICES SUMMARY

Total Post-Release Participants	4,317	1,864	960
Community-Based Participants	3,840	631	501
Participants Pending Release	477	749	459
Employed/Students	1,638	900	234

STAFF DEVELOPMENT

Total Annual Trainings	342	334	153
Total Staff Training Hours	82,080	80,170	46,750

GEO's 2020 annual funding commitment in support of the CoC program is approximately \$14 million, representing approximately 9% of GEO's net income.

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.

The GEO Continuum of Care® program demonstrates that participants 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.

GEO has implemented an intensive case management program to facilitate successful inmate transition to the community. Each individual within 12 months of release is matched with a highly skilled case manager.

During bi-weekly, one-on-one cognitive behavior sessions, the pair work on lowering criminogenic needs and on transition planning. Individuals are first assessed based on their risk index, or “Risk to Recidivate.” Individual needs and goals are determined from the results of the assessment to develop their transition case plan.

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. Team members also build presentation skills.

GEO has also invested in an extensive computer-based curriculum that meets individual learning styles. Academic subjects include math, science, social studies, language arts, and writing and computer skills. As part of the learning experience, core reasoning skills are integrated into each lesson.

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

The adult learning labs help those in our care not only to strengthen their academic skills, but also to work through anti-social criminal reasoning. As they work through the curriculum, participants begin to understand the importance of positive relationships and build upon their achievements.

\$1.6M invested to equip more than 800 classrooms across our facilities



ASHLAND UNIVERSITY PARTNERSHIP

In 2019, GEO partnered with Ashland University to provide post-secondary opportunities. Ashland University is the pioneering leader in tablet-based distance education delivery of post-secondary education in corrections and is ranked among the top tier of colleges and universities by U.S. News & World Report.

The Riverbend Correctional and Rehabilitation Facility in Georgia and the Graceville Correctional and Rehabilitation Facility in Florida each opened an Ashland University branch campus in the fall of 2019.

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 programs we offer encompass 26 different fields, including:

- Barbering
- Horticulture
- Electrical
- Building Trades
- Upholstery
- Weaving
- Hospitality and Tourism
- Architectural drafting
- Heating, Ventilation, and Air Conditioning (HVAC)
- Masonry
- Plumbing
- Culinary Arts
- Carpentry
- Welding

We're continually working to expand the vocational training and certification opportunities available to those in our care.

For example, GEO has collaborated with the International Association of Machinist & Aerospace Workers/National Federation of Federal Employees union (IAM/NFFE) to develop a pilot pre-apprenticeship program in Washington, D.C. to prepare individuals for Registered Apprenticeship programs.

FACILITATING TRANSITION: GEO'S POST-RELEASE SUPPORT SERVICES

Approximately 95% of all individuals incarcerated will 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 designed to reduce recidivism rates, as well as to increase public safety, reduce victimization, and improve the quality of life for released individuals upon returning to their communities.

GEO's post-release support services include providing assistance for:

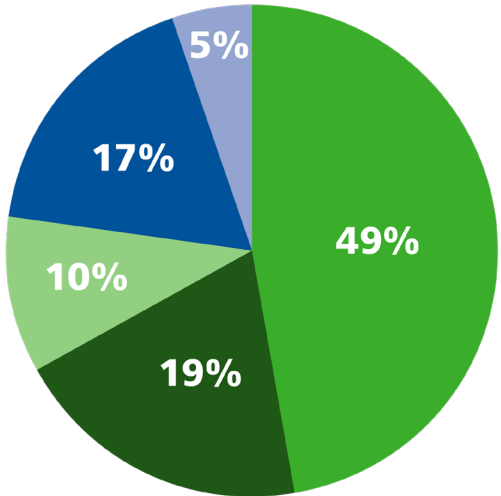
- Transitional housing
- Substance Abuse and Mental Health Treatment
- Vocational Training
- Transportation Assistance
- Family Reunification Opportunities
- Educational Classes
- Clothing and Food Vouchers
- Job Placement Assistance

As an extension of the GEO Continuum of Care initiative in six states, GEO's post-release case managers coordinate and facilitate the delivery of resources through 170 preferred providers. Weekly calls are scheduled with post-release participants to assess progress and provide support for up to 12 months, as well as motivate participants to continue in the behavioral change process.

In addition to its extended case management, education, training and related services, GEO allocates \$2.5 million in annual funding to assist those released from custody in obtaining such necessities as: housing (49%); clothing (19%); transportation (10%); food (17%); and other needs (5%).



GEO allocates \$2.5 million in annual funding to assist those released from custody



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. The program is designed to introduce and educate participants on the physical, mental and emotional dangers associated with drugs and alcohol, and to provide a means for breaking the cycle of substance abuse and addiction.

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. These programs include either group or individual counseling and substance abuse education.

based housing units include anger management, victim impact, life mapping, and goal setting, as well as courses on parenting skills, accountability, and purpose.

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

In addition, GEO has partnered with the University of the South West (USW) and The Urban Ministry Institute, which provide accredited classes to qualified participants. USW provides a full baccalaureate degree, and The Urban Ministry Institute provides 30 credits transferrable to nine fully accredited colleges around the country.

To aid reentry, GEO’s faith-based services enlisted the support of various transportation companies to provide Commercial Driver’s License (CDL) certification; small business associations to make available entrepreneurial mentors and workshops; and other faith groups that harness the funds and manpower of larger churches to provide post-release support.

For example, GEO’s partnership with the Global Leadership Network has provided 2,000 residents, 119 staff, and 28 volunteers in the past two years with the insight and knowledge of the most successful leaders in business, politics, and religion by participating in a two-day, live broadcast event. The program started with two GEO facilities in 2016, grew to 13 facilities by year-end 2018, and subsequently expanded to 20 GEO facilities by the end of 2019.

GEO Continuum of Care: Substance Abuse Treatment Program	2019	2018	2017
Average Daily Substance Abuse Treatment Attendance	18,038	17,965	14,112
Total Substance Abuse Treatment Completions	8,767	8,842	8,412

FAITH-BASED INITIATIVES

GEO currently partners with approximately 47 faith-based organizations around the country. National organizations and local community churches provide 3,130 volunteers to serve the individuals in our care and provide faith-specific doctrinal teaching, conduct worship services, teach faith-based life-skills classes, provide pastoral visitation opportunities, offer spiritual guidance, and conduct special holiday/holy day events.

On average, more than 22,000 individuals in our care attend chapel services each month throughout our facilities. We are undertaking efforts to bring additional special event programming to our facilities in order to achieve higher attendance.

Eleven dedicated faith and character-based housing units across our facilities provide at least one year of intensive faith-based and character-based programming. Classes in these faith and character-





**GEO Continuum of Care
Internal Certification**

Each of GEO's Continuum of Care® programs undergoes an internal certification process that begins 90 days after its implementation. The process involves the use of GEO's Quality Assurance System to monitor the delivery of services and maintain and enhance fidelity and integrity.

GEO program supervisors conduct monthly and quarterly internal audits of groups, case notes, and case files. GEO conducts annual facility

evaluations and contract compliance reviews. GEO also contracts with subject matter experts to conduct a comprehensive program checklist and a detailed measurement of program alignment with evidence-based principles.

The assessments extend to every aspect of GEO Continuum of Care® operations, performance, staff instruction, education and treatment methodologies, communication, and program outcomes.

CONTINUUM OF CARE SUCCESS STORIES



AMLAK-I FOLEY: GEO AIDS IN TRANSFORMATION FROM A LIFE OF CRIME TO POST-RELEASE CASE MANAGER

Early in his life, Amlak-I Foley was branded “a career criminal”; he bounced from prison-to-prison and ultimately received a 19-year sentence. After serving seven years in state prisons, he was transferred to GEO’s South Bay Correctional and Rehabilitation Facility for the remaining 12 years of his sentence. GEO’s overall approach and its GEO Continuum of Care® program made a big difference in his life.

From his initial days at South Bay, Foley says he experienced a different mindset: corrections guards and administrators addressed him as “sir” and “Mr. Foley.” He recalls that GEO’s forward-thinking approach “created a transition in my life because I started to feel like someone.”

The GEO team encouraged Foley to become engaged in his own process of change: “I had an urge to do this because I was in the midst of a community it happened in the oddest place – a prison where I had a connection with the staff,” he says.

With a renewed sense of dedication to self-improvement, he enrolled in several GEO-sponsored classes, including criminal thinking, anger management, and substance abuse. In turn, at the GEO team’s invitation, he became an active participant in the prison’s mission to change behaviors and change lives one inmate at a time.

Among other activities, he helped develop curricula for peer-to-peer mentoring groups, modeling positive behavior for inmates to mirror. Today, Foley considers his mentorship experience “life-changing” – both during his time in prison and after his release.

Ever since being released from prison, Foley has become a successful entrepreneur and business leader. He launched Wings of Wisdom Consulting Group, offering services in educational programming, mentoring and motivational speaking.

He also remains active in South Bay’s alumni group, an outgrowth of GEO’s Continuum of Care® program, committed to championing inmates while in custody and after their release. For Foley, this connection has continued to be a source of strength and inspiration, leading him to higher academic endeavors.

Foley today is pursuing a degree in international humanitarian law and wants to work to protect and promote human rights on a global scale. He was recently hired by GEO as a post-release case manager for the GEO Continuum of Care®, where he assists individuals who are now on the same path to success that he once walked.



HERDY CASSIUS: GEO HELPS TURN LIFE-LONG PASSION FOR MUSIC INTO FLEDGLING CAREER

At age 17, Herdy Cassius was a convicted felon sentenced to 10 years at GEO’s Moore Haven Correctional and Rehabilitation Facility. Uncertain of his future, he gravitated toward a music course, one of many academic and vocational courses offered as part of GEO’s Continuum of Care® program.

Although he lacked in formal training, Cassius had a passion for music dating back to childhood. Looking back on his prison time, he credits the environment and instruction at Moore Haven for helping him adopt and maintain a positive outlook, and to pursue his passion for music.

“My time at Moore Haven was amazing. It actually opened the door for me,” Cassius recalls. While there, he learned to play piano, guitar and drums, and found his voice as a songwriter and lyricist.

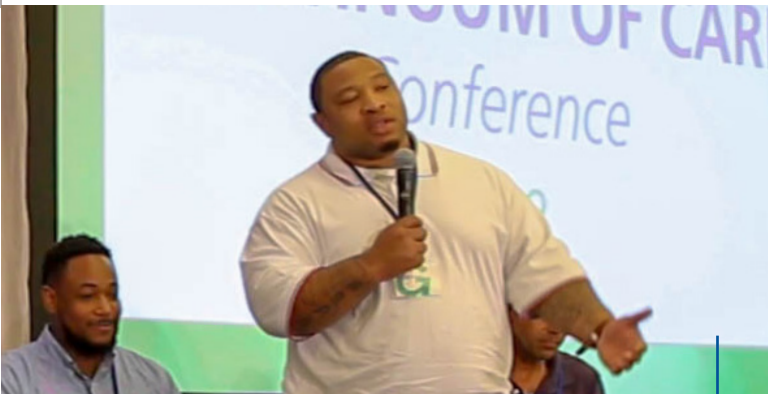
“The environment was conducive to writing and expressing myself which gave me direction,” he adds. He also supplemented his musical studies at Moore Haven with classes in general business and investing, which he says, “gave me more substance, not only as a musician but as a professional.”

Cassius was at a turning point just prior to his release: “I didn’t know how music was going to apply to my life after my release,” he recalls. “I want to give thanks to my peer mentors for encouraging and assisting me in enrolling in Broward College’s Visual and Performing Arts School to study music.” The GEO Post-Release Support team also helped him apply for and obtain financial aid.

Now age 28, Cassius is a music industry entrepreneur, singer, songwriter and producer with his own record label. The best part, Cassius says: “I feel good waking up and being somebody.” Confident and positive about his future opportunities, he remains grateful for GEO’s Continuum of Care® programming and peer support.

As a member of Moore Haven’s alumni group, he’s giving back, sharing elements of his journey to success and advocating for more arts programs at Moore Haven to nurture creativity and provide opportunities to grow, learn, and start anew.

“I want to give thanks for having this program,” he says. “What music has done for me is given me a future.”



KEVIN HOLLOWAY: COOKING UP SUCCESS

Kevin grew up in Columbus, Georgia. He was very close to his mother and enjoyed playing football, but he fell into the wrong crowd and spent years in several prisons.

Eventually, Kevin joined GEO’s Continuum of Care® program while at the Riverbend Correctional and

Rehabilitation Facility in Milledgeville, Georgia. At Riverbend, he participated in Faith Based programming, Thinking for A Change, Motivation to Change, and computer classes.

Beyond these vocational skills, Kevin credits the relationships he formed with case managers and fellow ex-offenders that gave him the confidence to succeed outside of prison.

Today, Kevin is a chef specializing in Caribbean food and proud of having served Clint Eastwood and many other satisfied customers.



KYLE HANCKOCK: BUILDING POSITIVE RELATIONSHIPS

As of this spring, Kyle has been out of prison for a year. Today, he works multiple jobs and is focused on raising his teenage son. “As long as I wake up,” he says, “I’ve got blood in my veins and breathe in my lungs, I’m going to make it happen. The right way.”

But it wasn’t always this way. When Kyle was 17, he made a few bad decisions explaining, “I was getting more care from bad friends than from my own family. I felt like I didn’t have anyone else on my team.” This led to a series of incarcerations, the last of which was GEO’s Riverbend Correctional and Rehabilitation Facility in Georgia.

Kyle says that Riverbend gave him the instruction, positive relationships and confidence to say goodbye to prison forever – though he did return once to mentor those still behind bars, and he looks forward to doing so again.

Learn more about Amlak-I, Herdy, Kevin, and Kyle, as well as other GEO Continuum of Care success stories at wearegeo.com/improving-lives/success-stories/

ENGAGING WITH OUR STAKEHOLDERS



GEO’s commitment to respect the human rights of all those in our care, as well as to our corporate sustainability journey and continuous improvement in our operations, is exemplified by our ongoing communication and engagement efforts with a diverse group of stakeholders.

GEO’s stakeholders include the individuals in our care, our employees and board members, government agency partners, regulators, accrediting organizations, faith-based organizations and NGOs, 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 secure services facilities, processing centers and community reentry programs, and to learn how GEO can improve its operations 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.

In 2020, Reverend Cokelia Dunn, George W. Hill Correctional Facility Chaplain, was nominated for and recognized as the Chaplain of the Year by the Pennsylvania Prison Chaplains Association. The George W. Hill Correctional Facility is managed by GEO on behalf of Delaware County, PA, and Reverend Dunn has served at the Facility as the full-time Chaplain and Volunteer Coordinator for more than ten years. In her role, she is directly responsible for responding to the spiritual needs of a multi-cultural, multi-ethnic, and multi-faith population.

As the Volunteer Coordinator for the Facility, Reverend Dunn maintains a network of over 100 dedicated volunteers, who are actively involved in religious programming, as well as other support programs. Over her long tenure, she has continuously developed and maintained relationships with local faith-based communities, which has resulted in hundreds of volunteers contributing thousands of hours of service to support the Facility's population. Her passion and understanding for all those she serves is truly remarkable and she is deserving of the honor of Chaplain of the Year.

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

When the COVID-19 pandemic reached New Mexico in March 2020, GEO's partner, the University of the Southwest (USW) had to make some very swift decisions. Since 2015, USW has partnered with the Lea County Correctional Facility (LCCF) in Hobbs, New Mexico to provide seminary level classes to incarcerated men who desire to be a part of the moral rehabilitation of their peers. When face-to-face education no longer became an option, an alternative delivery method had to be found.

In 2018, Crossroads Church in Odessa, Texas partnered with GEO/LCCF to live-stream their church services directly into the facility's meeting room. This gave inmates the opportunity to watch the service just as if they were there in person. The question was asked, "Why couldn't the same delivery method be used to stream college classes?"

Through the partnership between GEO/LCCF, USW, and Crossroads Church, the student-inmates at LCCF have been able to continue their theological training throughout the spring and summer sessions despite the COVID-19 pandemic. Eleven students are expected to complete their studies and be awarded bachelor's degrees from USW on July 24, 2020.

USW and GEO/LCCF intend to enroll a sixth cohort into its college program this fall. Through this partnership, new and innovative ways of delivering college classes are being explored. The goal is to find more ways to partner together to make higher education even more accessible to the incarcerated.

"I could not be prouder of the partnerships between USW, GEO/LCCF, and Crossroads Church in Odessa, Texas. Through the support of everyone involved, we were able to get these men the instruction they needed in a safe and effective manner through the pandemic when many programs were totally suspended throughout the country. We are always better together."

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*





New Century Education Foundation

New Century Education, based in New Jersey, designs, develops, and sells comprehensive education software products for the diagnosis, instruction, and assessment of students. It is uniquely designed to remediate deeply underperforming students and stresses pedagogies that accelerate the pace of learning, and that maximize retention.

“The partnership with New Century Education continues to grow. We started in 2017 with just one prison and have expanded to 10 facilities to date. In some facilities, the computer labs are set up inside of dorms and run by inmate peer facilitators. With proper safety measures, the men can continue working on their education during the COVID-19 crisis, despite being restricted to their dorms and despite teachers being restricted from entry.

By the end of 2019, we had men making two grade levels of gains during the year, i.e., 4th to 6th grade level for example, and some making a year of gain during the 4th quarter alone. This is important, because for each grade level gain, research confirms that average recidivism declines by 3%. New Century and GEO are now looking at ways to improve outcomes further by targeting an average of 0.5 grade level gains per quarter of use. The New Century/GEO partnership has proven once again that long lasting corporate synergies can be developed over time that benefit all involved.

We are most happy with our relationship and hope to expand and do more projects in the future.”

James Griffin

President, New Century Education Foundation



Civics Education Partnership Goes Online

With only a few exceptions, educational programs have come to a halt at facilities nationwide. In light of the COVID-19 crisis, this pandemic has caused us to reevaluate alternative ways in which programming can continue. Under the direction of Jim Flanagan, and through our partnership with FAU, the Civics Education Program (CEP) is continuing on at the South Bay Correctional and Rehabilitation Facility.

“While a crisis can alter the usual order of things, it can also be an opportunity for growth. With the rise of technology and the ability for tablets to be used for educational purposes, students in the CEP have continued learning during the pandemic. Students who have tablets can periodically sync their tablets and download educational videos in our ethics class. Students taking the literature course directed by Daniel Camacho (a master’s degree student from FAU), can also listen to audio lectures as he wraps up the course for this term. While we know this cannot replace in-person educational programming, we know that this temporary interruption in normal programming may provide an incredible solution to getting our coursework out to inmate students across the country. Until then, we will work tirelessly on this side of the cell and anticipate returning to correctional facilities when possible and safe to do so.”

Jim Flanagan

Director, Civics Education Program, Certell Inc.



THE GEO GROUP FOUNDATION

The GEO Group is committed to making a difference in the communities in which we operate. Every year, through our charitable arm, 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 over \$15 million to scholarships, children’s organizations, health and disability organizations, youth sports and development, veterans’ organizations, and various other charitable causes in the communities where we operate. Approximately a third of The GEO Group Foundation’s donations since 2011 have been allocated to higher education scholarships.

In 2019, The GEO Foundation donated more than \$2.4 million to diverse charitable causes, including \$716,000 toward higher education scholarships, over \$583,000 to health and disabilities organizations, and \$319,000 to children’s organizations in communities across the United States.

Overall, GEO donates more than 1% of annual profits to charitable and community organizations addressing local needs.



GEO FOUNDATION ANNUAL CHARITABLE GIVING (2017 – 2019)

	2019	2018	2017
Scholarships	\$716,000	\$709,000	\$709,500
Health & Disabilities	\$583,720	\$444,620	\$579,375
Children’s Organizations	\$319,395	\$175,002	\$311,146
Local Schools & Education	\$135,403	\$107,720	\$85,500
Public Entities	\$122,700	\$203,050	\$33,700
Other	\$559,349	\$267,250	\$523,985
TOTAL DONATIONS	\$2,436,567	\$1,906,642	\$2,243,206



COMMUNITY ENGAGEMENT

In addition to charitable giving, GEO’s facilities play an active role in giving back to their community 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 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 communities. These engagements help identify partnership opportunities between our facilities and local organizations and help build community trust and relationships.

An emphasis is also placed on increasing facility involvement in community affairs and services through employee volunteerism, fundraising, and participation in community events.



COMMUNICATION OF POLICIES TO SUPPLIERS

GEO works with numerous vendors and suppliers of services and goods and requires compliance with applicable 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- and veteran-owned vendors across our U.S. operations. In 2019, the total value of our contracts with women-owned businesses exceeded \$47 million, while those with small disadvantaged businesses exceeded \$31 million. Our payments to veteran-owned business totaled approximately \$13 million, and our contracts with businesses owned by disabled veterans totaled approximately \$7 million.

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

SMALL AND DIVERSE VENDOR BREAKOUT:

	2019	2018	2017
Woman Owned Business	\$47,655,002	\$36,483,810	\$28,288,062
Small Disadvantaged Business	\$31,102,153	\$34,006,569	\$27,762,547
Veteran Owned Business	\$12,876,204	\$11,187,155	\$10,553,882
Service Disabled Veteran Owned Business	\$6,737,969	\$5,282,609	\$4,873,967

DELIVERING ON OUR PROMISE: ETHICS AND GOVERNANCE



GEO's Corporate Code of 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 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 fair dealing practices
- Prompt internal reporting of Code violations
- Assuring accountability for compliance with the GEO Code of Conduct and Ethics

GEO's Code of Conduct and Ethics can be accessed on our website at [geogroup.com/Portals/0/Code_of_Business_Conduct_and_Ethics.pdf](https://www.geogroup.com/Portals/0/Code_of_Business_Conduct_and_Ethics.pdf)

Specific sections of GEO's Code of 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, 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.

To support our commitment to ethics and anti-corruption, GEO's Code of Business Conduct and Ethics is informed by laws and regulations including the Sarbanes-Oxley Act, the Foreign Corrupt Practices Act, the Federal Acquisition Regulations, the UK Bribery Act, and the Securities and Exchange Commission and New York Stock Exchange regulations.

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

ANTI-DISCRIMINATION AND ANTI-HARASSMENT

Section 6 of GEO's Code of 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."

on the part of any employee who identifies, learns of, or suspects a violation of proper and accurate disclosure to report this activity to the GEO's General Counsel for investigation.

The standards and policies described in each section of GEO's Code of 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 Conduct and Ethics, along with the GEO Employee Handbook, and are required to sign an acknowledgement form. All GEO employees – including field, regional and corporate – are required to read GEO's Code of Conduct and Ethics and sign an acknowledgement form annually.

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

GEO's Board of Directors is comprised primarily of external directors. Of GEO's board members, only one, George C. Zoley, the company's Chairman, CEO and Founder, is an officer of the company.

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.



BOARD OF DIRECTORS DIVERSITY

Board of Directors Diversity (2019-2017)	2019	2018	2017
# of Board of Directors Members	8	6	6
% of Underrepresented Minorities on the Board	25%	33%	33%
% of Women on the Board	25%	33%	33%
% of Board Independence	75%	83%	83%

Additional information on individual members of the GEO's Board of Directors is available on our company's website at geogroup.com/board_of_directors

THE ROLE OF CONTRACT COMPLIANCE IN CORPORATE GOVERNANCE

GEO works extensively with various government agencies and entities, which exercise broad oversight of the operations, management, and daily activities at each of the facilities we manage on their behalf. Compliance with the requirements set by these government entities is a critical component of GEO's overall governance, as well as its ongoing success and sustainability.

Our Contract Compliance Division reports directly to our Chairman and Chief Executive Officer, and operates independently from all of our other business units and divisions. Among the department's responsibilities is the completion of annual audits of all of our operations and the oversight of any and all required corrective measures.

Further details on GEO's Contract Compliance division are provided in the ESG Report chapter entitled: *Protecting Human Rights Through Oversight and Contract Compliance*.

IMPORTANCE OF EMPLOYEE TRAINING

All full and part time GEO employees, as well as contractors, undergo extensive training each year, including certifications associated with the performance of their individual job functions, as required by various federal, state, and local laws applicable to each jurisdiction in which we operate, and as stipulated under our company's government contracts.

In addition to instruction related to their individual job requirements and performance, 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.

Additional information on employee training and development at GEO is provided in the ESG Report chapters, *Our Commitment to Human Rights and Creating Opportunities: Developing our People*, as well as on GEO's website at geogroup.com/commitment_to_training_excellence

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"

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. Our political engagement efforts are educational, with the overarching objective

of informing lawmakers and policymakers of the long-standing services we have delivered on behalf of the federal government for over three decades under both Democratic and Republican Administrations.

Our government relations activities are focused on promoting the benefits of public-private partnerships in the delivery of residential care in secure facilities and processing centers, as well as the provision of evidence-based rehabilitation and community reentry programs through the GEO Continuum of Care®. GEO has been a trusted service provider to the federal government for over 30 years, and in that time, we have never advocated for or against, nor have we ever played a role in setting, criminal justice or immigration enforcement policies, such as whether to criminalize behavior, the length of criminal sentences or the basis for an individual's incarceration or detention.

GEO's government relations engagements and expenditures require approval by executive management. GEO's Legal Department supports the company's reporting and compliance obligations.

Furthermore, GEO also sponsors GEO PAC, a non-partisan political action committee, which is funded solely through voluntary employee contributions and which makes contributions to federal candidates and to candidates in certain jurisdictions where contributions from political action committees are allowed.

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.

Additional information on GEO's political engagement activities can be found on our website at geogroup.com/Political_Engagement

ENERGY AND ENVIRONMENTAL SUSTAINABILITY



Solar Panels at GEO's Adelanto ICE Processing Center

INVESTING IN ENERGY EFFICIENCY IMPROVEMENTS

In an effort to improve the energy efficiency of our facilities, GEO has invested approximately \$12 million to retrofit, modify, and upgrade lighting, water, laundry and HVAC systems. GEO has contracted Iconergy to provide Investment Grade Audit reports across our GEO Secure Services facilities. Iconergy provides professional energy engineering and commissioning services to public, private, and nonprofit sector organizations. This important initiative is reflective of GEO's goal to achieve a minimum of 15% in energy and utility savings.

Iconergy is responsible for identifying Energy Conservation Measures, which will provide GEO with both cost certainty and performance guarantees.

Below are the Energy Conservation Measures that have been implemented at a number of our facilities based on Iconergy's Investment Grade Audit reports:

- Lighting Efficiency (LED fixtures)
- Water Efficiency (Push Button shower, toilet and faucet fixtures)
- Water Service upgrades
- HVAC Duct Sealing & Outside Fresh Air Intake

GEO HAS INVESTED APPROXIMATELY

\$12M

to implement Energy Conservation Measures across GEO Secure Services facilities

ENVIRONMENTAL SUSTAINABILITY POLICY STATEMENT

As a Real Estate Investment Trust specializing in public-private partnerships for the design, financing, development, and operation of secure facilities, processing centers, and community reentry centers worldwide, we work to promote our growth and operations in a sustainable and responsible manner. We are committed to delivering our services, the development and operation of new and existing buildings, 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 the operation of 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 https://www.geogroup.com/Portals/0/Environmental_Policy.pdf

2019 GEO GROUP ENVIRONMENTAL PERFORMANCE METRICS		
Energy Consumption		Unit
Total energy usage	2,560,998	GJ
Electricity	356,733,890	kWh
Natural Gas	1,122,112	MMBtu
Diesel	180,867	Gal
Fuel Oil	245,347	Gal
Propane	301,482	Gal
Energy intensity Unit	125	energy/sq ft
Water Consumption		
Water Usage	2,186,751,342	Gallons
Water intensity	106	gallons/sq ft
Greenhouse Gas Emissions		
Scope 1 Emissions	68,516	MtCO ₂ e
Scope 2 Emissions*	166,886	MtCO ₂ e

* Location based

ASSESSING GEO’S ENVIRONMENTAL PERFORMANCE

In 2020, GEO undertook the initiative of determining the company’s carbon footprint, including Green House Gas Emissions and energy consumption data. Our corporate office worked directly with the field to gather 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.

2019 GEO GROUP ENVIRONMENTAL PERFORMANCE METRICS BY SEGMENT

	GEO SECURE SERVICES FACILITIES (U.S. + INTERNATIONAL)	GEO CARE FACILITIES (YOUTH + RESIDENTIAL REENTRY)	CORPORATE AND REGIONAL/DIVISIONAL OFFICES	
Energy Consumption				UNIT
<i>Total energy usage</i>	2,189,135	335,507	36,356	GJ
<i>Electricity</i>	314,474,870	37,333,093	4,925,927	kWh
<i>Natural Gas</i>	932,373	172,422	17,317	MMBtu
<i>Diesel</i>	177,384	1,136	2,347	Gal
<i>Fuel Oil</i>	163,635	81,660	52	Gal
<i>Propane</i>	231,468	70,014	0	Gal
<i>Energy intensity unit</i>	123	141	86	energy/sq ft
Water Consumption				
<i>Water Usage</i>	1,990,171,773	184,990,465	11,589,104	Gallons
<i>Water intensity</i>	112	78	27	gallons/sq ft
Greenhouse Gas Emissions				
<i>Scope 1 Emissions</i>	57,250	10,213	1,053	MtCO₂e
<i>Scope 2 Emissions*</i>	149,050	15,438	2,398	MtCO₂e

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, and electronics and batteries.

The data presented for GEO's 2019 Environmental Performance Metrics shows the company's total 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

ENVIRONMENTAL MANAGEMENT SYSTEM (EMS)

For several years, we have been monitoring our facilities' utility operating costs on a monthly basis, 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.

LEED CERTIFICATION

GEO is committed to sustainable building practices that incorporate energy efficiency and mitigate environmental impact in the development of new facilities. This is reflected in our focus on new design and construction in accordance with LEED standards administered by the Green Building Certification Institute.



The Green Building Certification Institute

The Leadership in Energy & Environmental Design (LEED) certification program is administered by the Green Building Certification Institute. LEED certification is based on an evaluation of a number of environmental factors including but not limited to the sustainability of the site, the efficient use of water, energy, material, and other resources, the quality of indoor air and overall environment, and the use of innovative and environmentally-friendly technologies and strategies.

The Green Building Certification Institute determines that a completed project satisfies all prerequisites and has achieved the minimum number of points outlined in the LEED certification program for the rating system to achieve a particular level of LEED certification – such as LEED Certified, LEED Silver, LEED Gold or LEED Platinum.

In 2011, GEO's Blackwater River Correctional and Rehabilitation Facility in Milton, Florida, became our first ever LEED Certified project to receive Gold Certification and to our knowledge, it is one of the first ever LEED Gold Certified correctional facilities in the United States. Since then, fourteen new or expanded GEO facilities throughout the U.S. have been designed in accordance with LEED certification standards.

Each new facility design considers all regulatory requirements, as well as applicable energy-saving and safety features.

Focus: GEO's Blackwater River Correctional and Rehabilitation Facility Meets LEED Gold Standards

The facility received LEED Gold Certification in 2011 and has many environmental and energy-efficient features, including:

- Heat-reflective white roofing systems
- Low-flow water fixtures
- Laundry water consumption control system
- Sustainable energy utilization: 70% electrical demand from wind power through the grid
- Waste recycling program
- Chilled water air conditioning system for interior climate management
- Dayrooms with auto shut-off lighting when skylights provide sufficient natural light



ENERGY CONSERVATION ACTIVITIES AT GEO FACILITIES

Starting in 2017, we began issuing an 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.

In addition to the energy conservation activities at existing GEO facilities, at each of our newly-constructed facilities, we are implementing a wide range of green initiatives, including:

- Use of R30 insulation in roofing
- R20 insulation in walls
- White reflective roofing materials
- Building management systems
- Low-flow showerheads
- Use of recycled water in laundry operations
- High efficiency LED lighting
- Occupancy sensors in offices and classrooms for lighting
- Use of gas for hot water heating instead of electricity
- Cycling of air conditioners using the building management system to avoid utility peak load charges
- Skylights for natural light with light-level sensors for balancing artificial lighting loads
- Low flow plumbing fixtures
- Control of plumbing fixtures, including showers, from control rooms
- Waterless urinals
- Use of timers/ photocells on exterior lighting
- High efficiency HVAC equipment
- Use of chilled water systems vs. rooftop DX units
- Heat recovery for laundry exhaust
- Photovoltaic solar panels

RECYCLING PROGRAMS AT OUR FACILITIES

Recycling is another way in which GEO promotes sustainability goals. Many of our facilities have implemented local recycling programs for materials, such as:

- Wastepaper and Cardboard Recycling
- Plastic Recycling
- Glass Recycling
- Wood and Wood Pallet Recycling
- Organic Waste Recycling
- Aluminum and Metals
- Electronics and batteries

Additional details regarding GEO’s energy-saving, conservation, and green building initiatives are available on our website [geogroup.com/Sustainability](https://www.geogroup.com/Sustainability)

ENVIRONMENTAL INITIATIVES AT BI INCORPORATED (BI)

GEO’s BI Incorporated division, which manufactures electronic monitoring devices, has initiated a number of environmental measures to promote recycling and the re-use of materials. The majority of equipment orders are shipped to the facility in recyclable plastic cases, which can be re-used four-to-five times longer than previously used cardboard shipping containers. The packaging for supplier parts also contains recycled components, and BI has implemented a shipping carton return service to promote recycling and sustainability.

In the U.S., BI also launched an environmental initiative in its manufacturing facility to recycle, repair, and reuse plastic products. Other green initiatives at BI include the installation of energy-efficient lighting and the procurement of products free of Ozone Depleting Chemicals, lead, and other harmful substances.

PROVIDING RESILIENCY FROM THE IMPACT OF NATURAL DISASTERS

In recent years, the large number of serious weather events occurring throughout the United States and the U.S. Geological Survey's recalibration of the country's seismic exposures have led to changes in various building codes and safety requirements.

Accordingly, we have made design modifications to our facilities in affected areas to comply with new codes and contractual requirements to protect the safety of our employees, those in our care, government employees, contractors, and visitors.

For instance, the Montgomery Processing Center in Conroe, Texas was designed as one of the first immigration processing centers in the country to be ICC 500 compliant, which qualifies the facility to act as a hurricane shelter. Its finish floor elevation was set above the 500-year flood plain and the facility also has a full facility double redundant emergency power back-up, which provides a minimum 72 hours of back-up power with service contracts for refueling.

In other flood-exposed areas across the United States, GEO strives to acquire sites that are protected from floodwater intrusion. All project designs have the facilities' finish floor elevations set at least above the 100-year flood plain.

Focus: New facility built to withstand serious weather events.

Completed in 2018, GEO's 1,000-bed Montgomery Processing Center in Conroe, Texas was designed in accordance with Leadership in Energy and Environmental Design (LEED) Silver standards, a globally-recognized symbol of sustainability achievement. Comprised of highly efficient and cost-saving green buildings, the Center is able to withstand a category 5 hurricane and can provide 100 percent auxiliary power in times of emergency.

Individuals in our care at the Montgomery Processing Center have access to enhanced recreational opportunities, including artificial turf soccer fields, shaded pavilions, basketball courts, paved walk path, and handball courts, and the Center features extensive onsite administrative office, courtroom, and support spaces. More information on the Montgomery Processing Center is available on our company website at geogroup.com/GEO-World-Detail/WorldID/57

Careful, Thoughtful Planning, New Construction Approaches Help Protect GEO Employees And Those Under Our Care From Impact Of Serious Weather Events

In recent years a significant number of serious weather events have struck many parts of the U.S. As part of its risk management responsibilities, GEO conducts extensive, ongoing crisis and business preparation and continuity planning at all of its facilities. We are also focused on building new facilities that are better able to withstand the impact of such events.



FINANCIAL MANAGEMENT AND PERFORMANCE



The GEO Group, Inc. (NYSE: GEO) is the first fully-integrated equity real estate investment trust (REIT) specializing in the design, financing, development, and operation of secure facilities, processing centers, and community reentry centers in the United States, Australia, South Africa, and the United Kingdom.

As a government services provider, 100% of GEO’s revenue is generated from contracts with local, state, and federal government agencies in the United States and internationally. As described on our company website and in our 2019 Annual Report GEO’s operations include:

- GEO Secure Services (geogroup.com/GEO_Secure_Services)
- GEO Care (geogroup.com/GEO-Care) which encompasses the GEO Continuum of Care®, GEO Reentry Services, Abraxas Youth Services, and BI Incorporated Electronic Monitoring

- International Services (geogroup.com/GEO_Secure_Services) which includes The GEO Group UK Ltd, The GEO Group Australia, and South African Custodial Management
- GEO Transport, Inc. (geogroup.com/GEO_Transport_Inc)
- The GEO Group Foundation (geogroup.com/Foundation)

Additional details regarding GEO’s structure and financial performance can be found on our Investor Relations website at investors.geogroup.com

GEO FINANCIAL HIGHLIGHTS

Financial Metrics	2019	2018	2017
Revenues*	\$2,477,922	\$2,331,386	\$2,263,420
Operating Income*	\$300,413	\$264,665	\$248,285
Net Income*	\$166,412	\$144,827	\$146,024
Income Tax Expense	\$16,648	\$14,117	\$17,958
Net Income Attributable to GEO per Diluted Share	\$1.40	\$1.20	\$1.21
Facilities in Operation	129	135	141
U.S. Employees	18,837	18,427	18,044
Total Employees	23,704	23,630	22,968

*USD in Thousands

APPENDIX



GRI Standard	Disclosure	Report Location or External GEO Reference
GRI 102: General Disclosures		
GRI 102: General Disclosures 2016	<i>Organizational profile</i>	
	102-1 Name of the organization	Letter from our Chairman, CEO and Founder; Page 3 10-K ; Page 1
	102-2 Activities, brands, products, and services	About the GEO Group; Page 6 Core Values & Mission Statement; Page 8 10-K ; Page 3-24
	102-3 Location of headquarters	Boca Raton, FL GEO HQ Facility Details 10-K ; Page 1
	102-4 Location of operations	About the GEO Group; Page 6 10-K ; Pages 10-19
	102-5 Ownership and legal form	Publicly-traded Real Estate Investment Trust 10-K ; Page 1 and 3
	102-6 Markets served	About the GEO Group; Page 6 Core Values & Mission Statement; Page 8 10-K ; Page 3-24
	102-7 Scale of the organization	Financial Management and Performance; Page 82 10-K ; Page 3-44
	102-8 Information on employees and other workers	Creating Opportunities: Developing our People; Page 44 10-K ; Pages 22-23
	102-9 Description of the organization's supply chain	Engaging with Our Stakeholders; Page 66
	102-10 Significant changes to the organization and its supply chain	There have been no significant changes to the organization or its supply chain.
	102-11 Precautionary Principle or approach	Delivering on Our Promise: Ethics and Governance; Page 72 Protecting Human Rights Through Oversight and Contract Compliance; Page 34
	102-12 External initiatives	GEO Group ESG Process, Rationale and Objectives; Page 12
	102-13 Membership of associations	Engaging with Our Stakeholders; Page 66 Creating Opportunities: Developing Our People; Page 44 Delivering on our Promise; Page 72
<i>Strategy</i>		
102-14 Statement from senior decision-maker	Letter from our Chairman, CEO and Founder; Page 3	
102-15 Key impacts, risks, and opportunities	GEO Group ESG Process, Rationale and Objectives; Page 12	
<i>Ethics and integrity</i>		
102-16 Values, principles, standards, and norms of behavior	Core Values & Mission Statement; Page 8 Delivering on Our Promise: Ethics and Governance; Page 72 Protecting Human Rights Through Oversight and Contract Compliance; Page 34 GEO's Code of Business Conduct and Ethics	
102-17 Mechanisms for advice and concerns about ethics	Delivering on Our Promise: Ethics and Governance; Page 72 Protecting Human Rights Through Oversight and Contract Compliance; Page 34 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
GRI 102: General Disclosures 2016	<i>Governance</i>	
	102-18 Governance structure	Delivering on Our Promise: Ethics and Governance; Page 72 2020 Proxy ; Pages 14-21
	102-20 Executive-level responsibility for economic, environmental, and social topics	Letter from our Chairman, CEO and Founder; Page 3 Delivering on Our Promise: Ethics and Governance; Page 72 Protecting Human Rights Through Oversight and Contract Compliance; Page 34
	102-21 Consulting stakeholders on economic, environmental, and social topics	GEO Group ESG Process, Rationale and Objectives; Page 12 Engaging with Our Stakeholders; Page 66
	102-22 Composition of the highest governance body and its committees	Delivering on Our Promise: Ethics and Governance; Page 72 2020 Proxy Statement ; Pages 13-20
	102-23 Chair of the highest governance body	Delivering on Our Promise: Ethics and Governance; Page 72 2020 Proxy Statement ; Pages 18
	102-24 Nominating and selecting the highest governance body	2020 Proxy Statement ; Pages 3-8; 16-18
	102-25 Conflicts of interest	Delivering on Our Promise: Ethics and Governance; Page 72 GEO's Code of Business Conduct and Ethics 2020 Proxy ; 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 12 Delivering on Our Promise: Ethics and Governance; Page 72
	102-27 Collective knowledge of highest governance body	GEO Group ESG Process, Rationale and Objectives; Page 12 Delivering on Our Promise: Ethics and Governance; Page 72 2020 Proxy Statement ; Pages 4-8
	102-31 Review of economic, environmental, and social topics	GEO Group ESG Process, Rationale and Objectives; Page 12
	102-33 Communicating critical concerns	Business Code & Ethics : Anti-bribery Corruption Training & Whistleblower Programs Corporate Policy & Procedure : Chapter 5 - Oversight
	102-35 Remuneration policies	2020 Proxy Statement ; Pages 22-42
	102-36 Process for determining remuneration	2020 Proxy Statement ; Pages 43-46
	102-37 Stakeholders' involvement in remuneration	2020 Proxy Statement ; Pages 43-49
	102-38 Annual total compensation ratio	2020 Proxy Statement ; Pages 42-43
	102-39 Percentage increase in annual total compensation ratio	2020 Proxy Statement ; Pages 42-44
	<i>Stakeholder engagement</i>	
	102-40 List of stakeholder groups	Engaging with Our Stakeholders; Page 66
	102-41 Collective bargaining agreements	Creating Opportunities: Developing Our People; Page 44

GRI Standard	Disclosure	Report Location or External GEO Reference
GRI 102: General Disclosures 2016	102-42 Identifying and selecting stakeholders	Engaging with Our Stakeholders; Page 66 ESG Process, Rationale and Objectives; Page 12
	102-43 Approach to stakeholder engagement	Engaging with Our Stakeholders; Page 66 ESG Process, Rationale and Objectives; Page 12
	102-44 Key topics and concerns raised	Engaging with Our Stakeholders; Page 66 ESG Process, Rationale and Objectives; Page 12
	<i>Reporting practice</i>	
	102-45 Entities included in the consolidated financial statements	Financial Management and Performance; Page 82 10K; Pages 77-83
	102-46 Defining report content and topic Boundaries	Letter from our Chairman, CEO and Founder; Page 3 ESG Process, Rationale and Objectives; Page 12
	102-47 List of material topics	ESG Process, Rationale and Objectives; Page 12 Engaging with Our Stakeholder; Page 66
	102-48 Restatements of information	No restatements of information
	102-49 Changes in reporting	No changes in reporting
	102-50 Reporting period	January 1, 2019 - December 31, 2019
	102-51 Date of most recent report	September 2019
	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	We referenced the GRI Standards during the development of this report and we include a GRI Standards Content Index for navigation and organization of our ESG disclosures. ESG Process, Rationale and Objectives; Page 12
102-55 GRI content index	GRI Standards Content Index; Page 85	
102-56 External assurance	No external assurance is provided at this time.	
Economic Topics		
GRI 201: Economic Performance 2016	<i>Economic Performance</i>	
	201-1 Direct economic value generated and distributed	2019 Annual Report; Page 33
GRI 204: Procurement Practices 2016	<i>Procurement Practices</i>	
	204-1 Proportion of spending on local suppliers	Engaging with Our Stakeholders; Page 66
GRI 205: Anti-corruption 2016	<i>Anti-corruption</i>	
	205-1 Operations assessed for risks related to corruption	GEO's Code of Conduct and Ethics articulate the company's policies and guidelines with respect to compliance with anti-bribery and anti-corruption laws.
	205-2 Communication and training about anti-corruption policies and procedures	The standards and policies described in each section of GEO's Code of Conduct and Ethics are communicated widely throughout our organization and reinforced with each of our employees through rigorous and ongoing training.
Environmental Topics		
GRI 302: Energy 2016	<i>Energy</i>	
	302-1 Energy consumption within the organization	Energy and Environmental Sustainability; Page 76
	302-3 Energy intensity	Energy and Environmental Sustainability; Page 76
	302-4 Reduction of energy consumption	Energy and Environmental Sustainability; Page 76
	302-5 Reductions in energy requirements of products and services	Energy and Environmental Sustainability; Page 76

GRI Standard	Disclosure	Report Location or External GEO Reference
GRI 303: Water 2018	<i>Water</i>	
	303-3 Water withdrawal	Energy and Environmental Sustainability; Page 76
GRI 305: Energy 2016	<i>Emissions</i>	
	305-1 Direct (Scope 1) GHG emissions	Energy and Environmental Sustainability; Page 76
	305-2 Energy indirect (Scope 2) GHG emissions	Energy and Environmental Sustainability; Page 76
	305-4 GHG emissions intensity	Energy and Environmental Sustainability; Page 76
Social Topics		
GRI 401: Employment 2016	<i>Employment</i>	
	401-1 New employee hires and employee turnover	Creating Opportunities: Developing Our People; Page 44
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Creating Opportunities: Developing Our People; Page 44
GRI 403: Occupational Health and Safety 2018	<i>Occupational Health and Safety</i>	
	403-1 Occupational health and safety management system	Ensuring Safety and Security; Page 52
	403-2 Hazard identification, risk assessment, and incident investigation	Ensuring Safety and Security; Page 52
	403-5 Worker training on occupational health and safety	Ensuring Safety and Security; Page 52
GRI 404: Training and Education 2016	<i>Training and Education</i>	
	404-1 Average hours of training per year per employee	Creating Opportunities: Developing Our People; Page 44
	404-2 Programs for upgrading employee skills and transition assistance programs	Our Commitment to Respecting Human Rights; Page 18 Creating Opportunities: Developing Our People; Page 44
GRI 405: Diversity and Equal Opportunity 2016	<i>Diversity and Equal Opportunity</i>	
	405-1 Diversity of governance bodies and employees	Creating Opportunities: Developing Our People; Page 44
GRI 410: Security Practices 2016	<i>Security Practices</i>	
	410-1 Security personnel trained in human rights policies or procedures	Our Commitment to Respecting Human Rights; Page 18 Creating Opportunities: Developing Our People; Page 44
GRI 412: Human Rights Assessment 2016	<i>Human Rights Assessment</i>	
	412-1 Operations that have been subject to human rights reviews or impact assessments	Our Commitment to Respecting Human Rights; Page 18
	412-2 Employee training on human rights policies or procedures	Our Commitment to Respecting Human Rights; Page 18 Creating Opportunities: Developing Our People; Page 44
GRI 415: Public Policy 2016	<i>Public Policy</i>	
	415-1 Political contributions	Delivering On Our Promise: Ethics and Governance; Page 75



The GEO Group, Inc. ®

WORLD HEADQUARTERS

4955 Technology Way

Boca Raton, Florida 33431 USA

561.893.0101 866.301.4436

www.geogroup.com