

Political Activity And Lobbying Report (2019)

Overview

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 largely educational, with the overarching objective of informing lawmakers and policymakers of the long-standing quality services we have delivered on behalf of federal and state government agencies 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 to state governments for several decades, 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 or length of an individual's incarceration or detention.

GEO uses corporate resources to support the Company's political engagement and educational efforts, including expenditures for external entities who advocate on GEO's behalf. Any such advocacy requires the prior approval of GEO's Senior Vice President, Client Relations, is overseen and managed by GEO's Client Relations Department, and is conducted in accordance with applicable law. GEO's General Counsel's office 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 Activities and Contributions Policy and their expenditure requires authorization and approval by GEO's General Counsel's office, and by our Chief Executive Officer and Chief Financial Officer for any contributions in excess of \$5,000.

Political contributions made by GEO entities or the GEO PAC should not be construed as an endorsement of all policies or positions adopted by any given candidate.



Board Oversight

GEO’s Board of Directors (the “Board”) routinely engages with GEO’s management, ensuring proper oversight. At a minimum once per calendar year, the Board’s Nominating and Corporate Governance Committee, composed entirely of independent directors, reviews GEO’s Political Activities and Contributions Policy and undertakes a review of the Company’s lobbying activities and political contributions. The Nominating and Corporate Governance Committee may adjust the review, approval and disclosure thresholds in GEO’s Political Activities and Contributions Policy from time to time.

Additionally, the Nominating and Corporate Governance Committee receives a presentation on the Company’s lobbying activities and political contributions, including any payments for direct or indirect lobbying or grassroots lobbying communications, any membership in and payments to any tax-exempt organization that writes and endorses model legislation, and a breakdown of the political contributions made by GEO entities and the non-partisan, employee-funded GEO PAC.





GEO PAC Contributions

GEO sponsors a non-partisan federal political action committee that is funded solely by voluntary employee contributions. The GEO PAC is a federally registered PAC that may make contributions in connection with federal elections, subject to contribution limits defined by the Federal Election Campaign Act. The GEO PAC may also make state-level political contributions, in compliance with state contribution limitations, registration and reporting requirements where applicable.

The Company does not penalize in any way GEO employees who do not contribute to the GEO PAC. As permitted by law, corporate funds and facilities are used to provide administrative support for the GEO PAC, including the solicitation of contributions and the distribution of funds.

All GEO PAC contributions must be approved by the GEO PAC board of directors. Detailed information on the GEO PAC's contributions to candidate campaigns and other political committees is publicly disclosed in the GEO PAC's regular reports to the Federal Election Commission ("FEC"). Disbursements from the PAC to state-level candidates and committees are also reported on these FEC filings.



All of the GEO PAC's filings with the FEC are available for public review on the FEC's website at www.fec.gov.

The GEO Group’s Policy on Political Contributions:

Where lawfully permitted, GEO is authorized to contribute corporate funds to political candidates and political parties.

Guidelines

- A. Federal campaign laws prohibit corporate contributions to federal candidates and most political committees.
- B. Federal law prohibits any entity that contracts with the federal government from making a political contribution to any political party, committee, or candidate for federal office.
- C. Political contributions may include direct monetary contributions of corporate funds, in-kind contributions of corporate funds such as disbursement of funds to pay for candidate or party expenses, contributions of goods and services and all monetary contributions of a political nature for which the fair market value is less than the amount paid.
- D. Federal and state laws prohibit reimbursement of any person for campaign contributions.
- E. GEO’s General Counsel’s office and outside counsel review all requests for corporate political contributions to ensure compliance with applicable state and federal campaign laws.

Approval Procedure

1. The authorized company representative requesting the political contribution will provide a completed Political Contribution Request Form, and any appropriate supplementary documentation to the Senior Vice President, Client Relations for approval.
2. Once the Political Contribution Request Form has been signed by the Senior Vice President, Client Relations, all requests must be routed to the General Counsel’s office. The political contribution is reviewed by in-house and outside counsel to ensure compliance with applicable laws. While all requests must be approved by the General Counsel’s office, any requests in excess of \$5,000 must also be approved by the CEO and the CFO.
3. In no event may any employee, officer or director be reimbursed for making political contributions.

Political Contributions Table *

Totals by Source of Funds:	2019
• Combined- Corporate and GEO PAC	\$2,755,108
-Corporate	\$2,315,330
-GEO PAC	\$439,778
Totals by Recipient Category	2019
• Federal Candidates, Parties & Committees (Combined)	\$1,187,700
• State/Local Candidates, Parties & Committees (Combined)	\$1,567,408

* Totals reflect aggregate contributions made by corporate subsidiaries and GEO PAC.



Lobbying Disclosures

Engagement in legislative and regulatory proceedings at the federal, state and local levels of government is important to GEO's political engagement and educational efforts. GEO participates in the political process and retains the services of consultant government relations professionals in jurisdictions where it has or may pursue the development of public-private partnerships.

Federal and state laws, including the Lobbying Disclosure Act, require GEO to report expenditures associated with these activities. Political information on these activities and associated expenditures can be obtained at <http://disclosure.senate.gov/> and <http://lobbyingdisclosure.house.gov>. Each searchable site provides access to all of GEO's lobbyist's reports. The total expenditures disclosed on the federal forms include all of GEO's spending on federal, state and local lobbying.

Information on GEO's political contributions and lobbying disclosures can also be found in state agency websites, such as the respective Departments of State, Ethics Commissions and/or State Divisions of Election (e.g. sos.ca.gov, www.ethics.state.tx.us, dos.myflorida.com).

Fees for Direct Lobbying

In 2019, GEO paid an aggregate amount of approximately \$4.3 million to consultant government relations professionals for direct lobbying (as defined by the Internal Revenue Code (IRC) 162 (e)).

Trade and Membership Associations, Chambers of Commerce and other Groups

GEO belongs to two trade associations as a member: the National Association of Real Estate Investment Trusts (NAREIT) and the Day 1 Alliance. NAREIT describes itself as the worldwide representative voice for real estate investment trusts ("REITs") and real estate companies with an interest in U.S. real estate. NAREIT's members are REITs and other real estate companies throughout the world that own, operate, and finance income-producing real estate, as well as those firms and individuals who advise, study, and service those businesses. The Day 1 Alliance describes itself as a trade association representing private sector contractors helping address corrections and detention challenges in the United States.

GEO does not currently have any membership in nor make payments to any tax-exempt organization that writes and endorses model legislation.

From time to time, GEO may also contribute to other trade and membership associations, chambers of commerce, etc. Below is a list of organizations to which GEO paid dues, fees, or contributions of \$25,000 or more in 2019.

National Association of Real Estate Investment Trusts (NAREIT): \$82,940

Day 1 Alliance: \$100,000



Disclosure and Reports

GEO's Political Activities and Contributions Policy will be published on GEO's website. In addition to complying with all reporting requirements under applicable law, on an annual basis, GEO will publish on its website at https://www.geogroup.com/Political_Engagement its annual Political Activity and Lobbying Report.