

SUPPLEMENT TO GEO GROUP 2019 ESG AND HUMAN RIGHTS REPORT

As The GEO Group continues in our ESG and human rights journey, we recognize the need to provide greater transparency with respect to our policies, practices and initiatives.

Accordingly, our reporting must continuously provide information that supplements the disclosure of GEO's ESG and human rights initiatives and the different objective metrics and scoring associated with them.

We have identified supplemental information in two critical areas of our past disclosures: first, past disclosures did not highlight several existent governance practices and policies regarding GEO's strong commitment to high standards of ethical behavior and business conduct at all levels; and second, past disclosures did not describe several extensive existent measures GEO takes to ensure the health and safety of our employees and all individuals in our care.

ETHICS AND ANTI-CORRUPTION

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

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



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

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

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

HEALTH AND SAFETY

GEO's commitment to respect the rights of our employees and those entrusted to our care begins with the core principle of respecting the rule of law. The origin of GEO's commitment to respect the rule of law is the United States Constitution. Unlike other private enterprise, the nature of GEO's operations and services requires that we act in a manner that upholds inalienable rights created by the U.S. Constitution.

Because we operate facilities in the service of government agencies, GEO must operate our facilities in a manner that respects the rights of those in our care in the same way that a government agency would respect them. In recognition of this dynamic, GEO has embedded those rights in our company and operations, creating a culture of compliance with the laws, rules and regulations governing the operation of our facilities and programs.

In accordance with these precepts, GEO respects civil liberties and freedom of speech of our employees and all individuals in our care, and we are committed to protecting these rights at all times.

At the same time, GEO's health and safety practices apply to all employees and contractors. Throughout our operations, we have established objective, quantifiable targets and extensive feedback and reporting mechanisms to achieve continuous improvement in our health and safety performance.

As part of this initiative, GEO developed a comprehensive response to the COVID-19 pandemic and implemented widespread measures at our facilities to protect the health and wellbeing of our employees and individuals under our care. The health, safety, and well-being of those in our care correlates with the health, safety, and well-being of GEO staff, administration, and their families. Our interests are aligned with respect to mitigation strategies to slow the spread of the coronavirus and limiting resulting infections of COVID-19. As with previous viral outbreaks in secure facility settings (e.g., mumps, Zika, H1N1, hepatitis C, and AIDS-HIV), we work in strict compliance with the guidance provided by the Centers for Disease Control and Prevention (CDC) and our government agency partners.

Beginning in March of 2020, we implemented additional protection for employees and those in our care from coronavirus transmission utilizing a combination of engineering controls, administrative/work practice controls, and personal protective equipment (PPE). Examples of our prevention and mitigation efforts include:

- **Engineering Controls**
 - Suspension of onsite visitation;
 - Staff requirement to complete medical questionnaire and pass a daily temperature check;
 - Intake procedure modifications to screen new inmates/detainees; and
 - Isolation of COVID-19 positive inmates/detainees and quarantine of symptomatic inmates/detainees as well as those in close contact with COVID-19 positive inmates/detainees.
- **Administrative/Work Practice Controls**
 - Communication (via meetings, memos, and postings) and enforcement of social distancing obligations;
 - Use of floor markers to inform and encourage social distancing;
 - Modification of inmate/detainee movements to accommodate social distancing;
 - Posted reminders regarding coughing and sneezing etiquette, the importance of frequent hand-washing, and the use of PPE; and
 - Increased cleaning and disinfection of facilities, including high-touch areas (e.g., door knobs/handles, light switches, handheld radios), housing unit day rooms, dining areas, and other areas where inmates/detainees assemble.

Additional information on our COVID-19 response can be found on page 10 of our [2019 ESG and Human Rights Report](#).