

THE GEO GROUP, INC.

**CODE OF ETHICS FOR CEO, SENIOR FINANCIAL OFFICERS
AND OTHER EMPLOYEES**

ADOPTED ON MARCH 30, 2004

EFFECTIVE APRIL 5, 2004

NOTE: The following Code of Ethics for the CEO, Senior Financial Officers and Other Employees of the Company is contained in Section 18 of the Company's Code of Business Conduct and Ethics, is subject in full to the complete terms and conditions of the Company's Code of Business Conduct and Ethics and has been reproduced below solely for the purpose of making it separately accessible via the Company's website.

18. Special Code of Ethics for CEO, Senior Financial Officers and Other Employees

All of the Company's employees, including the CEO and all senior financial officers, are responsible for full, fair, accurate, timely and understandable disclosure in the periodic reports required to be filed by the Company with the Securities and Exchange Commission. Accordingly, it is the responsibility of all employees of the Company to promptly to report any untrue statement of material fact and any omission of material fact of which he or she may become aware pertaining to information prepared by him or her or associates in his or her area(s) of responsibility that affect the disclosures made by the Company in its public filings.

The CEO, each senior financial officer, and any other employee of the Company, shall promptly bring to the attention of the Disclosure Committee and, if deemed appropriate by the Disclosure Committee, to the Audit Committee of the Company, any information he or she may have concerning (a) significant deficiencies in the design or operation of internal controls or disclosure controls which could adversely affect the Company's ability to record, process, summarize and report financial data on an accurate and timely basis or (b) any fraud, whether or not material, that involves management or other employees who have a significant role in the Company's financial reporting, disclosures or internal controls.

The CEO, each senior financial officer and any other employee of the Company, shall promptly bring to the attention of the General Counsel and, if deemed appropriate by the General Counsel, to the Audit Committee of the Company, any information he or she may have concerning any violation of this Code, including any actual or apparent conflicts of interest between personal and professional relationships involving any management or other employees who have a significant role in the Company's financial reporting, disclosures or internal controls.

The CEO, each senior financial officer and any other employee of the Company, shall promptly bring to the attention of the General Counsel and, if deemed appropriate by the General Counsel, to the Audit Committee of the Company, any information he or she may have

concerning evidence of a material violation of the securities or other laws, rules or regulations applicable to the Company, by the Company or any agent thereof.

The non-management members of the Board of Directors shall determine whether a violation of this Code by the CEO or any of the Company's senior financial officers has occurred and, if so, determine appropriate actions to be taken in the event of such violations. Such actions shall be reasonably designed to deter wrongdoing and to promote accountability for adherence to this Code and shall include, as appropriate, written notices to the individual involved that the non-management members of the Board of Directors have determined that there has been a violation, a censure, a demotion or re-assignment of the individual involved, a suspension with or without pay or benefits (as determined by the non-management members of the Board of Directors) and a termination of the individual's employment. In determining what action is appropriate in a particular case, the non-management members of the Board of Directors shall take into account all relevant information, including the nature and severity of the violation, whether the violation was a single occurrence or repeated occurrences, whether the violation appears to have been intentional or inadvertent, whether the individual in question had been advised prior to the violation as to the proper course of action and whether or not the individual in question had committed other violations in the past.

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