

	<p align="center">CORPORATE POLICY & PROCEDURE MANUAL</p> <p>CHAPTER: 01 - General Administration</p> <p>TITLE: 1.2.5 Political Activities and Contributions POLICY</p>	<p><u>NUMBER:</u> 1.2.5</p> <p><u>SUPERSEDES:</u> 11/29/2018</p> <p><u>EFFECTIVE:</u> 03/10/2021</p> <p><u>REVIEWED ON:</u> 03/09/2021</p>
---	--	--

POLICY

Where lawfully permitted, it is the policy of The GEO Group, Inc. (GEO or the Company) to make political contributions when it determines such contributions are in the best interest of GEO and its shareholders. The Company may also make contributions in support of, or in opposition to, state and local initiatives in which the Company has a substantial interest; however, we do not advocate for stricter sentencing guidelines or those laws that determine the basis or length of an individual’s incarceration or detention.

GEO respects our employees’ right to participate in the political process and to communicate with their elected representatives using their own time and resources. However, GEO’s resources and facilities must not be used for private political or lobbying activities. The use of corporate resources to influence the political process is strictly regulated to protect and promote the integrity of the political processes of governments around the world. GEO supports and complies with these regulations and expects GEO directors, officers, and employees, in the course of their employment, to comply as well.

POLITICAL ACTIVITIES

Examples of “Political Activities” include running for public office; supporting or opposing a candidate for office or a political party, political cause, or ballot initiative; political fundraising; assisting with political transition activities; and other election-related activities, whether partisan or not, such as voter registration and get-out-and-vote campaigns.

Other than authorized GEO Client Relations activity, employees are prohibited from indicating that GEO sponsors, endorses, or opposes any candidate, referendum, or ballot initiative. Employees are also prohibited from indicating that personal support of a position or candidate is equivalent to GEO supporting that position or candidate.

POLITICAL CONTRIBUTIONS

A “Political Contribution” is anything of value, including contributions in-kind having an attributable monetary value in any form, given, loaned, or advanced to influence an election. Where lawfully permitted, GEO may make Political Contributions when it determines such contributions to be in the best interest of the Company and its shareholders. The Company may also make contributions in support of, or in opposition to, state and local initiatives in which the

	CORPORATE POLICY MANUAL	NUMBER: 1.2.5
---	--------------------------------	--------------------------------

Company has a substantial interest, however we do not advocate for increased correctional capacity or stricter sentencing guidelines.

GEO uses corporate resources in order to support the Company's viewpoint on important public policy issues, 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.

Federal, state and local laws may restrict to whom GEO may contribute and the amount of contribution that may be made. These restrictions apply to monetary contributions as well as in-kind contributions, such as the use of corporate facilities or resources. Federal law prohibits any entity that contracts with the federal government from making a political contribution to any political party, committee, or candidate for political office.

GEO employees must obtain the proper approvals prior to committing GEO or the GEO PAC to making any political contributions. GEO's Client Relations Department approves all requests for Political Contributions. The Legal Department will review all requests for corporate political contributions for compliance with applicable state and federal campaign laws.

This Policy does not prohibit lawful activities and the use of GEO resources by GEO and the GEO Political Action Committee (GEO PAC), nor does it limit the lawful activities of GEO Client Relations.

Federal and state laws prohibit reimbursement of any person for campaign contributions.

GEO PAC

GEO PAC is a voluntary nonpartisan political action committee established by GEO in accordance with federal law. GEO PAC is authorized to make political contributions to federal candidates and candidates in certain states, as well as contributions to certain other political organizations. Political contributions to candidates at the federal level and in numerous state and local jurisdictions are made through GEO PAC, which is exclusively funded through voluntary, non-partisan employee contributions, and these contributions should not be construed as an endorsement of all policies or positions adopted by any individual candidate. The Company does not penalize in any way GEO employees who do not contribute to the GEO PAC. The GEO PAC complies with all applicable laws concerning political contributions, including laws requiring public disclosure of such contributions. 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 distributions of funds.

	<p align="center">CORPORATE POLICY MANUAL</p>	<p align="center">NUMBER: 1.2.5</p>
---	--	---

Pay-to-Play Laws

Some state and local governments in the United States have enacted “pay-to-play” laws, which require reporting or, in some instances, entirely prohibit entities and certain individuals from making political contributions to government officials if they also hold or seek to obtain government contracts. To ensure GEO’s compliance with pay-to-play laws, officers, directors, and those employees frequently in contact with public officials should consult with GEO’s Legal Department before making political contributions to candidates and political organizations in federal, state and local jurisdictions. Employees are always encouraged to seek advice from the Legal Department before engaging in political activities where the employee is unsure of applicable rules.

LOBBYING

Examples of “lobbying” include communicating with lawmakers and other public officials to inform and help shape public policy on issues, and in many jurisdictions also includes “grassroots” or indirect lobbying contacts, as well as lobbying for public procurements and contracts. Lobbying is highly regulated and often contains detailed reporting requirements. GEO, its directors, officers, employees, and anyone acting on its behalf must comply with all lobbying laws, wherever GEO does business. If your job involves interactions with any government or public official, be sure you know the lobbying laws of the area in which you do business and regularly check for changes. If in doubt about the applicable laws, consult with GEO’s Legal Department.

GEO’s Client Relations Department manages GEO’s lobbying activities. Before hiring a lobbyist, engaging in direct lobbying, or communicating with public officials on GEO’s behalf, you must consult with GEO Client Relations. GEO’s political and lobbying activities focus on promoting the benefits of public-private partnerships in the delivery of secure residential care in correctional and detention facilities, community reentry and supervision programs, and electronic and location monitoring services, as well as the provision of evidence-based rehabilitation, both in-custody and post-release, through the GEO Continuum of Care®. GEO does not take a position on nor advocate for or against criminal justice or immigration 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.

All employees interacting with government or engaging lobbyists are responsible for understanding and complying with all lobbying laws that affect their business activities, including registration, reporting and recordkeeping requirements.



APPROVED: _____
Corporate Policy Director

3/10/2021

EFFECTIVE: _____

	CORPORATE POLICY MANUAL	NUMBER: 1.2.5
---	--------------------------------	--------------------------------

POLICY OWNER: Louis Carrillo, Executive Vice President, Corporate Counsel

REFERENCES: ACA Standards 4-4024, 4-ACRS-7E-13, 4-ALDF-7C-02