

## 1. INTRODUCTION

Since being founded in 1984, The GEO Group, Inc. (GEO) has remained committed to respecting the human rights of our employees, contractors, stakeholders, the communities in which we operate, and all of the individuals entrusted to our care. As a leading provider of support services for secure correctional and detention facilities, community reentry centers and programs, secure transportation, electronic monitoring, and in-custody rehabilitation and post-release support services, we play a critical role in supporting our federal, state and local government agency partners' law enforcement missions.

This policy, as approved by the Human Rights Committee and the Board of Directors in February 2025, supersedes the Global Human Rights Policy we adopted in 2013. This revised policy strengthens our commitment to safeguarding the rights of those entrusted to our care, including inmates and detainees as well as employees, contractors, the communities in which we operate, our suppliers, and our government partners, by fostering a deep respect for human rights across all areas of our operations.

This policy was developed within the framework of the United Nations Guiding Principles on Business and Human Rights, and was revised based on the findings of a human rights due diligence assessment previously conducted by an independent third party involving both internal and external stakeholders, as well as comprehensive research on the subject matter at issue.

## 2. POLICY SCOPE

This policy applies to all GEO employees and its subsidiaries worldwide. GEO is committed to taking appropriate measures to implement this policy. This commitment extends to our directors, contractors, suppliers, and third parties performing work at GEO facilities.

## 3. HUMAN RIGHTS COMMITMENTS

GEO's Global Human Rights Policy is guided by the following international standards:

- The United Nations Universal Declaration on Human Rights,
- The Standard Minimum Rules for the Treatment of Prisoners,
- The Basic Principles for the Treatment of Prisoners,
- The Convention on the Rights of the Child,
- The International Labor Organisation Declaration on Fundamental Principles and Rights at Work,
- The International Covenant on Civil and Political Rights, and
- The International Covenant on Economic, Social and Cultural Rights.

GEO ensures that human rights considerations are integrated into all aspects of our operations. A human rights risk assessment and due diligence process shaped our policy. The process identified salient human rights based on the nature of the services we provide. GEO is committed to conducting ongoing assessments to ensure our operations are aligned with ethical standards and respect for human dignity.

Our human rights due diligence followed a four-step process, including active engagement with critical internal and external stakeholders. We used a saliency assessment to evaluate each human right based on scale, reach, probability, remediability, and linkage. These scores were then aggregated to classify issues as “high” and “very high.”

Based on our risk assessment and due diligence process, our human rights commitments for stakeholders include the following:

### **Individuals in our Care**

- **Dignity and Protection:** We recognize that persons in our care have inherent human rights and must be treated with dignity at all times. GEO is committed to complying with all applicable laws and regulations regarding the care and protection of those in our care, including freedom of religion and protecting the right to worship.
- **Use of Force:** Use of force is restricted to situations where it is absolutely necessary. The use of firearms is permitted only in cases of self-defense or in cases where there is an imminent threat of death or serious harm to a person.
- **Safe Environment:** GEO is dedicated to maintaining a safe environment free from unlawful physical and verbal abuse, harassment, and sexual misconduct.
- **Rehabilitation and Education:** GEO supports and promotes education, vocational training, and rehabilitative programs to help individuals successfully reintegrate into society. This includes providing access to leisure and legal libraries.
- **Voluntary Work Program:** At many GEO Facilities, individuals can volunteer to participate in a Voluntary Work Program administered in accordance with government agency partner directives and standards.

### **Employees**

- **Non-Discrimination:** GEO maintains a workplace that is free from discrimination and harassment, ensuring that all employees are treated with respect, regardless of race, gender, age, disabilities, religion, sexual orientation, or other characteristics.
- **Equal Opportunities:** GEO is committed to providing equal employment opportunities, supporting the right to freedom of association, and fostering an inclusive work environment.
- **Safe Working Conditions:** GEO upholds high standards for workplace safety, ensuring compliance with labor laws regarding working hours, fair compensation, and access to benefits.
- **Human Rights Training:** All employees receive training on human rights standards and practices to ensure our policies are implemented effectively in our operations.
- **No Forced or Child Labor:** GEO enforces strict policies prohibiting forced labor and child labor in all GEO operations, contractors, and third-party suppliers.

### **Suppliers and Contractors**

- GEO expects all suppliers and contractors to meet our human rights standards and to be guided by internationally accepted human rights standards and principles consistent with the United Nations Guiding Principles on Business and Human Rights. Failure to comply with these standards may

result in terminating contracts or business relationships.

- Suppliers and contractors working directly or indirectly on government contracts must be aware of and comply with all the terms of the government contract and act with care in their relationship with the government as detailed in the GEO Group Vendor Code of Conduct.

### Communities

- **Positive Impact:** GEO seeks to be a responsible corporate citizen by engaging with communities to create a positive social and environmental impact. This includes offering employment opportunities, supporting education and rehabilitation programs, and working with local partners to enhance community welfare.

- **Energy/Utilities Consumption:** We are committed to continuously improving our operational processes to reduce our consumption and lower utility operating costs.

- **Law Enforcement:** GEO provides support services for government agencies which play a fundamental role in law enforcement making it critical that we promote, respect, and obey the rule of law, as well as the institutions that create and enforce it. We expect that our stakeholders share our commitment to the rule of law, even if they may disagree with specific laws or enforcement priorities.

## **4. POLICY IMPLEMENTATION**

The implementation of this policy is overseen by GEO's Senior Vice President and General Counsel, ensuring company-wide accountability.

### Quality Control Program

GEO's commitment to respecting human rights is reinforced by our Quality Control Program, which includes strict audit processes, reporting requirements, and adherence to accreditation and certification guidelines based on American Correctional Association (ACA) accreditation, Prison Rape Elimination Act (PREA) compliance and certification and, for the Immigration Processing Centers, the DHS Performance-Based National Detention Standards. Each GEO facility undergoes numerous audit reviews, including annual GEO corporate audits, government agency audits, and third-party inspections. Every GEO facility is subject to regular internal and external audits, and these cover many human rights topics.

### Awareness and Training

This policy is integrated into GEO's Code of Business Conduct and Ethics (Code), which is communicated widely throughout the organization and reinforced through rigorous and ongoing training. All GEO field staff receive a minimum of 40 hours of training per year, including training regarding the Code and Global Human Rights Policy, among others.

### Whistleblower Program

GEO provides employees and third parties with a confidential, anonymous toll-free hotline managed by an independent third-party provider to report any potential violations of this policy. This hotline is available 24/7 and in multiple languages, and GEO enforces a strict Anti-Retaliation Policy to

protect whistleblowers.

Formal and informal grievance procedures are also available to individuals in our care, allowing them to report concerns through secure channels, including drop boxes or informal discussions with facility leadership. These procedures are communicated to participants and residents during the admission process. If a formal complaint is made, it is promptly investigated. Individuals also have access to grievance mechanisms from our government agency partners and other oversight resources.

After all appropriate steps necessary to investigate the allegation are taken, and it has been determined that there was a violation of the Code of Business Conduct and Ethics, depending on the circumstances, either the Audit and Finance Committee will report such determination to the Board of Directors or OPR will report such determination to the applicable regional or divisional vice president, who will then take such preventative or disciplinary action as deemed appropriate.

## 5. GOVERNANCE AND OVERSIGHT

GEO, its Board of Directors, and the Board's Human Rights Committee are responsible for overseeing the implementation and effectiveness of this policy. The Board and the Human Rights Committee annually reviews GEO's implementation of this policy to ensure it remains aligned with the international human rights standards and stakeholder expectations.

GEO is committed to transparency and stakeholder engagement. We actively seek input from key stakeholders, including employees, government agency partners, community representatives, and the individuals entrusted to our care to continually improve our human rights practices. GEO publishes Human Rights metrics and other information that can be used to evaluate our long-standing commitment to respecting the human rights of our employees, contractors, stakeholders, the communities in which we operate, and all of the individuals entrusted to our care.