

	<p align="center"><b>CORPORATE POLICY &amp; PROCEDURE MANUAL</b></p> <p><b>CHAPTER: 01 - General Administration</b></p> <p><b>TITLE: 1.2.5-A Political Activities and Contributions Procedure</b></p>	<p><b><u>NUMBER:</u></b> 1.2.5-A</p> <p><b><u>SUPERSEDES:</u></b> 3/10/2021</p> <p><b><u>EFFECTIVE:</u></b> 11/14/2025</p>
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**PROCEDURE**

A. APPROVALS - ROUTING

*GEO CORPORATE CONTRIBUTIONS*

1. The contribution requester will provide a completed Political Request Contribution Form (LG-204), and any appropriate supplementary documentation to the Senior Vice President, Client Relations for approval. For example, a Facility Administrator would provide the completed form to the Senior Vice President, Client Relations for approval.
2. Once the LG-204 form has been signed by the Senior Vice President, Client Relations, all requests must be routed to the Legal Department and Chief Financial Officer for final approval.
3. The Legal Department will review all requests for Political Contributions for compliance with applicable State and Federal Campaign laws.
4. All requests in excess of \$500 must be approved by the Executive Chairman, Chief Executive Officer, the Legal Department, the Chief Financial Officer, and the Senior Vice President Client Relations.
5. In no event may any employee, officer or director be reimbursed for making political contributions.
6. The Legal Department is responsible for ensuring all approvals are obtained as required by the procedures and shall not authorize payment of Political Contributions without all required approvals.



*GEO PAC CONTRIBUTIONS*

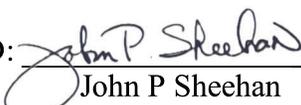
1. GEO PAC has Articles of Organization and Bylaws that govern the administration of the GEO PAC, including powers and authority of its officers as well as the criteria for disbursement of funds contributed.
2. The Legal Department will review all requests for GEO PAC Contributions for compliance with applicable State and Federal Campaign laws.
3. Any request for a GEO PAC contribution shall be reviewed and approved by the PAC officers and directors in accordance with its Bylaws.
4. After approval by the GEO PAC, the PAC services will issue the contribution pursuant to the Bylaws and from its separate segregated fund.

*COVERED INDIVIDUAL CONTRIBUTIONS*

1. Because of its status as a government contractor to certain state and local jurisdictions, some localities prohibit or limit personal political contributions of GEO's Board Members, Officers, or their immediate family members. The policy in this subsection is intended to maximize a covered individual's ability to engage in personal political activity without jeopardizing GEO's ability to compete for and hold state and local government contracts.
2. A covered individual must notify the Legal Department office prior to making any personal Political Contribution. In limited circumstances where required by state or local laws that prohibit Political Contributions to certain public officials responsible for contract decisions, the Legal Department may disallow or limit such contributions in order to maintain GEO's ability to hold existing government contracts and seek new government contract opportunities.

**B. RECORDS / DOCUMENTATION**

1. A copy of the Political Request Contribution Form (LG-204) and attached documentation will be kept in the Legal Department for 7 years.
2. Client Relations and the Legal Department shall maintain records of all GEO PAC Political Contributions.

APPROVED:   
John P Sheehan  
Corporate Policy Director