

U.S. Immigration
and Customs
Enforcement

August 31, 2020

Daniel McGrath
American Oversight
1030 15th Street NW, B 255
Washington, DC 20005

RE: Worth Rises and American Oversight v. DHS et al, (20-cv-01876-AT)
ICE FOIA Case Number 2020-ICLI-00030
Third Interim Release

Dear Mr. McGrath:

This is the third interim response to your client's Freedom of Information Act (FOIA) request to U.S. Immigration and Customs Enforcement (ICE) dated July 23, 2019. Your client is seeking records pertaining to the following:

All e-mail communications (e-mails, e-mail attachments, and calendar invitations) between political appointees and members of the Senior Executive Service in the offices specified below and the following entities:

- a. Correct Care Solutions (@correctcaresolutions.com),
- b. Wellpath (@wellpath.us, @higcapital.com),
- c. Correctional Medical Group Companies (CMGC) (@cmgcos.com),
- d. Armor Correctional Health (@armorcorrectional.com),
- e. Corizon (@corizonhealth.com),
- f. Wexford Health Sources (@wexfordhealth.com),
- g. NaphCare (@naphcare.com),
- h. Centene Corporation (@centene.com),
- i. CoreCivic (@cca.com @corecivic.com),
- j. G4S (@G4S.com),
- k. Akima Global Services (@akima.com),
- l. Management and Training Corporation (@mtctrains.com),
- m. Navigators Global (@navigatorsglobal.com),
- n. Brownstein Hyatt Farber Schreck, LLP (@bhfs.com),
- o. GEO Group (@geogroup.com),
- p. Talton Communications (@talton.com),
- q. Telmate (@telmate.com),

r. Global Tel Link (@gtl.net),
s. Securus Technologies (@securustechnologies.com),
t. CenturyLink (@CenturyLink.com),
u. Legacy Inmate (@legacyinmate.com),
v. PayTel(@paytel.com),
w. BI Incorporated (@Bi.com),
x. Attenti (@attentigroup.com),
y. Avalon (@avaloncorrections.net),
z. Libre By Nexus (@librebynexus.com, @pintausa.com),
aa. PTS of America (@prisonertransport.net)
bb. Valley Metro Security (@valleymetro.org),
cc. TransCor (@TransCor.com),
dd. Bradley Arant Boult Cummings LLP (@bradley.com) (including any communications with Paul Kavinoky) or
ee. Ballard Partners (@ballardfl.com) (including any communications with David Stewart).

Records were requested from the offices specified below:

- a. Office of Director
- b. Office of Deputy Director
- c. ICE Health Service Corps
- d. Office of Detention Oversight
- e. Custody Management Office
- f. Detention Management Division
- g. Detention Planning and Acquisitions
- h. Detention Monitoring Unit
- i. Detention Standards Compliance Unit
- j. Office of Acquisition Management

ICE has considered your request under the FOIA, 5 U.S.C. § 552.

A search of the ICE Office of Enforcement and Removal Operations (ERO) and Office of Acquisition Management (OAQ) located records that were potentially responsive to your request. For this production ICE reviewed 565 pages of potentially responsive records. ICE has determined that 31 pages of records were duplicative in nature or non-responsive. Please be advised, in accordance with Executive Order 12600, 333 pages required coordination with a 3rd party submitter of information. We are awaiting a response from the 3rd party and these records will be provided in a later production. Therefore, this production consists of 201 pages of responsive records, which have been Bates numbered 2020-ICLI-00030 865 through 2020-ICLI-00030 1065.

ICE has applied FOIA Exemptions (b)(4), (b)(5), (b)(6), (b)(7)(C), and (b)(7)(E) to portions of the pages produced as described below.

FOIA Exemption 4 protects “trade secrets and commercial or financial information...[that is] privileged or confidential.” Under the new U.S. Supreme Court precedent, *Food Marketing Institute v. Argus Leader Media*, 139 S. Ct. 2356 (2019), information will be deemed “confidential” for the

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purposes of protection under Exemption 4 “at least where commercial or financial information is both customarily and actually treated as private by its owner and provided to the government under an assurance of privacy.” I have reviewed the responsive documents, the submitter’s objections to release, and relevant case law, and I have determined that portions of the responsive records are exempt from disclosure under subsection (b)(4) of the FOIA and must be withheld in order to protect the submitter’s proprietary interests.

ICE has applied FOIA Exemption 5 to protect from disclosure intra-agency documents that contain the recommendations, opinions, and conclusions of agency employees, and portions of the responsive documents which qualify for protection under the deliberative process privilege, the attorney-client privilege, and the attorney work-product privilege.

FOIA Exemption 5 protects inter-agency or intra-agency memorandums or letters which not be available by law to a party other than an agency in litigation with the agency. The deliberative process privilege protects the integrity of the deliberative or decision-making processes within the agency by exempting from mandatory disclosure opinions, conclusions, and recommendations included within inter-agency or intra-agency memoranda or letters. The release of this internal information would discourage the expression of candid opinions and inhibit the free and frank exchange of information among agency personnel. The attorney work-product privilege protects documents and other memoranda prepared by an attorney in contemplation of litigation. The attorney-client privilege protects confidential communications between an attorney and his client relating to a legal matter for which the client has sought professional advice. It applies to facts divulged by a client to his attorney, and encompasses any opinions given by an attorney to his client based upon, and thus reflecting, those facts, as well as communications between attorneys that reflect client-supplied information. The attorney-client privilege is not limited to the context of litigation.

ICE has applied FOIA Exemptions 6 and 7(C) to protect from disclosure the names, e-mail addresses, and phone numbers of ICE and DHS employees contained within the documents, as well as the names, and other personally identifiable information of other individuals contained within the records.

FOIA Exemption 6 exempts from disclosure information in personnel or medical files and similar files the release of which would cause a clearly unwarranted invasion of personal privacy. This requires a balancing of the public’s right to disclosure against the individual’s right to privacy. The privacy interests of the individuals in the records you have requested outweigh any minimal public interest in disclosure of the information. Any private interest you may have in that information does not factor into the aforementioned balancing test.

FOIA Exemption 7(C) protects records or information compiled for law enforcement purposes when production of such could reasonably be expected to constitute an unwarranted invasion of personal privacy. This exemption takes particular note of the strong interests of individuals, whether they are suspects, witnesses, or investigators, in not being unwarrantably associated with alleged criminal activity. That interest extends to persons who are not only the subjects of the investigation, but those who may have their privacy invaded by having their identities and information about them revealed in connection with an investigation. Based upon the traditional recognition of strong privacy interests in law enforcement records, categorical withholding of information that identifies third parties in law enforcement records is ordinarily appropriate.

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ICE has applied FOIA Exemption 7(E) to protect from disclosure internal agency law enforcement case numbers contained within the document, internal codes used to identify folders in an internal ICE task management system, law enforcement database category codes, and law enforcement techniques.

FOIA Exemption 7(E) protects records compiled for law enforcement purposes, the release of which would disclose techniques and/or procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law. The disclosure of certain law enforcement sensitive information contained within the responsive records could reasonably be expected to risk circumvention of the law. Additionally, the techniques and procedures at issue are not well known to the public.

If you have any questions about this letter, please contact Kirti Reddy, Assistant U.S. Attorney, at (212) 637-2751 or kirti.reddy@usdoj.gov.

Sincerely,

Dexter E. Johnson/for
Catrina Pavlik-Keenan
FOIA Officer

Enclosure(s): 201 pages

cc:
Kirti Reddy
Assistant U.S. Attorney

www.ice.gov

From: (b)(6); (b)(7)(C)
Sent: 14 Aug 2019 20:42:10 +0000
To: (b)(6); (b)(7)(C)
Subject: Accepted: Pine Prairie Disability Accommodations- Policies, Standards,
and Notifications

From: (b)(6); (b)(7)(C)
Sent: 14 Aug 2019 21:09:19 +0000
To: (b)(6); (b)(7)(C)
Cc:
Subject: DANs with Health Summaries PPIPC
Attachments: (b)(6); (b)(7)(C)
(b)(6); (b)(7)(C)
(b)(6); (b)(7)(C)
HEALTH SUMMARY.pdf, (b)(6); (b)(7)(C) HEALTH
SUMMARY.pdf, (b)(6); (b)(7)(C) HEALTH SUMMARY.pdf, (b)(6); (b)(7)(C) HEALTH
SUMMARY.pdf, (b)(6); (b)(7)(C) HEALTH SUMMARY.pdf, (b)(6); (b)(7)(C) HEALTH SUMMARY.pdf,
(b)(6); (b)(7)(C) HEALTH SUMMARY.pdf, (b)(6); (b)(7)(C) HEALTH SUMMARY.pdf

Please see attached. I have included the DAN as well as the health summary form which is completed by the nurse/provider issuing the low bunk. The diagnosis for the lower bunk is listed on the corresponding health summary classification form. The plan of action is listed on the DAN. Is this along the lines of what you were looking for in your previous e-mail?

Disregard the other DANs outside of this list that were sent to you. The records were reviewed by the provider and the lower bunks were temporary and discontinued.

I look forward to our call this Friday to clarify the types of information that you need.

Thank you.

(b)(6); (b)(7)(C) **RN, RHSM**
Eastern Region Health Services Manager Geo Secure Services
The Geo Group, Inc
13777 Ballantyne Corporate Place, Suite (b)(6)
Charlotte, N.C. 28277
Tel: 704-543-(b)(6); Mobile: 561-430-(b)(6);
(b)(6); geogroup.com
www.geogroup.com

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

DETAINEE DISABILITY ACCOMMODATION NOTIFICATION

INSTRUCTIONS: **This form is to be completed by Field Office and/or detention facility supervisory-level personnel**

This form is designed to process requests for accommodations and modifications of policies, practices and procedures from and on behalf of detainees with disabilities in order to comply with its obligations under Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794, as amended (Section 504). Per the guidance provided in the ERO Directive 11304, Assessment and Accommodations for Detainees with Disabilities, the FOD shall take steps to ensure that he or she is notified in writing by the facility administrator of any Detainee identified as having a communication or mobility impairment, and any facility denial of a request for an accommodation beyond the provision of medication or medical or mental health care.

Field Office and/or detention facility supervisory personnel should complete Parts A-E, as applicable, and Field Office personnel should sign electronically, if possible. Submit completed forms and any questions to ERO Headquarters at ERO.RA@ice.dhs.gov. Please do not submit non-electronic forms.

Part A: Detainee Information

Last Name: (b)(6); (b)(7)(C)	First Name: (b)(6); (b)(7)(C)
Date of Birth: [REDACTED]	Alien Number: [REDACTED]
AOR: NOL	Facility: PINE PRAIRIE CORRECTIONAL CENTER If not listed, type in the facility: N/A

Part B: Notification Type (To be submitted to the Field Office within 72 hours of a completed assessment)

- ☒ Notification of Detainee Identified with a Communication or Mobility Impairment. **If yes, proceed to Part C of this form.**
- ☐ Notification of Facility Denial of a Requested Accommodation for a Detainee with a Disability. **If yes, proceed to Part D of this form.**

Part C: Communication or Mobility Impairment

1. Please check all that apply. Per the Directive, Detainees with communication impairments include Detainees with physical, hearing, visual, and speech impairments (e.g., Detainees who are deaf or hard of hearing, blind, or nonverbal). Detainees with mobility impairments include Detainees with physical impairments who require a wheelchair, crutches, prosthesis, cane, other mobility device, or other assistance.

☐ Communication Impairment

- ☐ Speech disability (e.g., speech impairment or non-verbal)
- ☐ Blind
- ☐ Low Vision
- ☐ Deaf
- ☐ Hard of Hearing
- ☐ Other (e.g., cognitive or intellectual impairments):

☒ Mobility Impairment (Detainee has or requires)

- ☐ Wheelchair
- ☐ Crutch(es)
- ☐ Prosthesis
- ☐ Cane
- ☒ Other Device or Assistance (Please describe):

LOW BUNK

Additional relevant information about the impairment (Optional).

2. The accommodations or modifications requested by the Detainee. Please check/list all accommodations and/or modifications requested:

☐ Auxiliary Aids

- ☐ Accessible Software
- ☐ Audiotapes
- ☐ Braille Documents
- ☐ Eyeglasses
- ☐ Large Print Documents
- ☐ Hearing Aid
- ☐ Sign Language Interpreter
- ☐ Note Taker

☐ General

- ☐ Modification to the Facility's Policy or Procedure
- ☐ Housing Relocation
- ☒ Lower Bunk
- ☐ Accessible Cell
- ☐ Accessible Shower

☐ Mobility Aids

- ☐ Cane
- ☐ Crutches
- ☐ Wheelchair
- ☐ Prosthesis

☐ Other

☐ None Requested

Additional Information About the Requested Accommodation or Modification:

3. The facility's approved accommodation plan:

LOW BUNK

Part D: Denial of a Disability Accommodation or Modification

1. Please check all that apply. *Per the Directive, the Field Office Director (FOD) should be notified of all decisions to deny a Detainee's request for an accommodation beyond the provision of medication or medical or mental health care, unless the Detainee is provided an equally effective alternative accommodation.*

☐ **Communication Impairment**

- ☐ Speech disability (e.g., non-verbal)
- ☐ Blind
- ☐ Low Vision
- ☐ Deaf
- ☐ Hard of Hearing
- ☐ Other (Please describe):

☐ **Mobility Impairment-** Detainee has or requires:

- ☐ Wheelchair
- ☐ Crutch(es)
- ☐ Prosthesis
- ☐ Cane
- ☐ Other Device or Assistance (Please describe):

☐ **Intellectual or Cognitive Impairment**

☐ **Dental**

☐ **Other** (Please describe):

2. The accommodations or modifications requested by the Detainee. Please check/list all accommodations and/or modifications requested:

☐ **Auxiliary Aids**

- ☐ Accessible Software
- ☐ Audiotapes
- ☐ Braille Documents
- ☐ Eyeglasses
- ☐ Large Print Documents
- ☐ Hearing Aid
- ☐ Sign Language Interpreter
- ☐ Note Taker

☐ **General**

- ☐ Modification to the Facility's Policy or Procedure
- ☐ Housing Relocation
- ☐ Lower Bunk
- ☐ Accessible Cell
- ☐ Accessible Shower

☐ **Mobility Aids**

- ☐ Cane
- ☐ Crutches
- ☐ Wheelchair
- ☐ Prosthesis

☐ **Other**

☐ **None Requested**

Additional Information About the Requested Accommodation or Modification:

3. Check all the reasons for the denial and include any relevant supporting or additional information:

- ☐ No accommodation or modification was required for the detainee to access the facility's programs or activities.
- ☐ There is no relationship ("nexus") between the detainee's disability and the requested accommodation or modification.
- ☐ Accommodation requested would fundamentally alter the nature of the program, service or activity.
- ☐ Accommodation requested would result in an undue financial and administrative burden.
- ☐ Other

Additional Information about the Reasons for the Denial:

4. Any steps the facility has taken to address the detainee's needs.

Part E: Facility and Field Office Submission Information

1. **Facility Administrator or Designee**

Name of facility staff member completing form (if applicable): (b)(6);

Title of facility staff member completing form (if applicable): Acting HSA

Date submitted: 08/13/2019

2. **ERO Field Office**

Name of ERO Field Office official completing form (if applicable): (b)(6); (b)(7)(C)

Title of ERO Field Office official completing form (if applicable): SDDO

Date submitted: 08/13/2019

Additional Information (action(s) taken, recommendations, comments):

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

DETAINEE DISABILITY ACCOMMODATION NOTIFICATION

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Field Office and/or detention facility supervisory personnel should complete Parts A-E, as applicable, and Field Office personnel should sign electronically, if possible. Submit completed forms and any questions to ERO Headquarters at ERO.RA@ice.dhs.gov. Please do not submit non-electronic forms.

Part A: Detainee Information

Last Name: (b)(6); (b)(7)(C)	First Name: (b)(6); (b)(7)(C)
Date of Birth: [REDACTED]	Alien Number: [REDACTED]
AOR: NOL	Facility: PINE PRAIRIE CORRECTIONAL CENTER If not listed, type in the facility: N/A

Part B: Notification Type (To be submitted to the Field Office within 72 hours of a completed assessment)

- ☒ Notification of Detainee Identified with a Communication or Mobility Impairment. **If yes, proceed to Part C of this form.**
- ☐ Notification of Facility Denial of a Requested Accommodation for a Detainee with a Disability. **If yes, proceed to Part D of this form.**

Part C: Communication or Mobility Impairment

1. Please check all that apply. *Per the Directive, Detainees with communication impairments include Detainees with physical, hearing, visual, and speech impairments (e.g., Detainees who are deaf or hard of hearing, blind, or nonverbal). Detainees with mobility impairments include Detainees with physical impairments who require a wheelchair, crutches, prosthesis, cane, other mobility device, or other assistance.*

☐ Communication Impairment

- ☐ Speech disability (e.g., speech impairment or non-verbal)
- ☐ Blind
- ☐ Low Vision
- ☐ Deaf
- ☐ Hard of Hearing
- ☐ Other (e.g., cognitive or intellectual impairments):

☒ Mobility Impairment (Detainee has or requires)

- ☐ Wheelchair
- ☐ Crutch(es)
- ☐ Prosthesis
- ☐ Cane
- ☒ Other Device or Assistance (Please describe):

LOW BUNK

Additional relevant information about the impairment (Optional).

2. The accommodations or modifications requested by the Detainee. Please check/list all accommodations and/or modifications requested:

☐ Auxiliary Aids

- ☐ Accessible Software
- ☐ Audiotapes
- ☐ Braille Documents
- ☐ Eyeglasses
- ☐ Large Print Documents
- ☐ Hearing Aid
- ☐ Sign Language Interpreter
- ☐ Note Taker

☐ General

- ☐ Modification to the Facility's Policy or Procedure
- ☐ Housing Relocation
- ☒ Lower Bunk
- ☐ Accessible Cell
- ☐ Accessible Shower

☐ Mobility Aids

- ☐ Cane
- ☐ Crutches
- ☐ Wheelchair
- ☐ Prosthesis

☐ Other

☐ None Requested

Additional Information About the Requested Accommodation or Modification:

3. The facility's approved accommodation plan:

LOW BUNK

Part D: Denial of a Disability Accommodation or Modification

1. Please check all that apply. *Per the Directive, the Field Office Director (FOD) should be notified of all decisions to deny a Detainee's request for an accommodation beyond the provision of medication or medical or mental health care, unless the Detainee is provided an equally effective alternative accommodation.*

☐ **Communication Impairment**

- ☐ Speech disability (e.g., non-verbal)
- ☐ Blind
- ☐ Low Vision
- ☐ Deaf
- ☐ Hard of Hearing
- ☐ Other (Please describe):

☐ **Mobility Impairment-** Detainee has or requires:

- ☐ Wheelchair
- ☐ Crutch(es)
- ☐ Prosthesis
- ☐ Cane
- ☐ Other Device or Assistance (Please describe):

☐ **Intellectual or Cognitive Impairment**

☐ **Dental**

☐ **Other** (Please describe):

2. The accommodations or modifications requested by the Detainee. Please check/list all accommodations and/or modifications requested:

☐ **Auxiliary Aids**

- ☐ Accessible Software
- ☐ Audiotapes
- ☐ Braille Documents
- ☐ Eyeglasses
- ☐ Large Print Documents
- ☐ Hearing Aid
- ☐ Sign Language Interpreter
- ☐ Note Taker

☐ **General**

- ☐ Modification to the Facility's Policy or Procedure
- ☐ Housing Relocation
- ☐ Lower Bunk
- ☐ Accessible Cell
- ☐ Accessible Shower

☐ **Mobility Aids**

- ☐ Cane
- ☐ Crutches
- ☐ Wheelchair
- ☐ Prosthesis

☐ **Other**

☐ **None Requested**

Additional Information About the Requested Accommodation or Modification:

3. Check all the reasons for the denial and include any relevant supporting or additional information:

- ☐ No accommodation or modification was required for the detainee to access the facility's programs or activities.
- ☐ There is no relationship ("nexus") between the detainee's disability and the requested accommodation or modification.
- ☐ Accommodation requested would fundamentally alter the nature of the program, service or activity.
- ☐ Accommodation requested would result in an undue financial and administrative burden.
- ☐ Other

Additional Information about the Reasons for the Denial:

4. Any steps the facility has taken to address the detainee's needs.

Part E: Facility and Field Office Submission Information

1. **Facility Administrator or Designee**

Name of facility staff member completing form (if applicable): (b)(6); (b)(7)(C)

Title of facility staff member completing form (if applicable): Acting HSA

Date submitted: 08/13/2019

2. **ERO Field Office**

Name of ERO Field Office official completing form (if applicable): (b)(6); (b)(7)(C)

Title of ERO Field Office official completing form (if applicable): SDDO

Date submitted: 08/13/2019

Additional Information (action(s) taken, recommendations, comments):

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

DETAINEE DISABILITY ACCOMMODATION NOTIFICATION

INSTRUCTIONS: **This form is to be completed by Field Office and/or detention facility supervisory-level personnel**

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Field Office and/or detention facility supervisory personnel should complete Parts A-E, as applicable, and Field Office personnel should sign electronically, if possible. Submit completed forms and any questions to ERO Headquarters at ERO.RA@ice.dhs.gov. Please do not submit non-electronic forms.

Part A: Detainee Information

Last Name: (b)(6); (b)(7)(C)	First Name: (b)(6); (b)(7)(C)
Date of Birth: [REDACTED]	Alien Number: [REDACTED]
AOR: NOL	Facility: PINE PRAIRIE CORRECTIONAL CENTER If not listed, type in the facility: N/A

Part B: Notification Type (To be submitted to the Field Office within 72 hours of a completed assessment)

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- ☐ Notification of Facility Denial of a Requested Accommodation for a Detainee with a Disability. **If yes, proceed to Part D of this form.**

Part C: Communication or Mobility Impairment

1. Please check all that apply. Per the Directive, Detainees with communication impairments include Detainees with physical, hearing, visual, and speech impairments (e.g., Detainees who are deaf or hard of hearing, blind, or nonverbal). Detainees with mobility impairments include Detainees with physical impairments who require a wheelchair, crutches, prosthesis, cane, other mobility device, or other assistance.

☐ Communication Impairment

- ☐ Speech disability (e.g., speech impairment or non-verbal)
- ☐ Blind
- ☐ Low Vision
- ☐ Deaf
- ☐ Hard of Hearing
- ☐ Other (e.g., cognitive or intellectual impairments):

☒ Mobility Impairment (Detainee has or requires)

- ☐ Wheelchair
- ☐ Crutch(es)
- ☐ Prosthesis
- ☐ Cane
- ☒ Other Device or Assistance (Please describe):

LOW BUNK

Additional relevant information about the impairment (Optional).

2. The accommodations or modifications requested by the Detainee. Please check/list all accommodations and/or modifications requested:

☐ Auxiliary Aids

- ☐ Accessible Software
- ☐ Audiotapes
- ☐ Braille Documents
- ☐ Eyeglasses
- ☐ Large Print Documents
- ☐ Hearing Aid
- ☐ Sign Language Interpreter
- ☐ Note Taker

☐ General

- ☐ Modification to the Facility's Policy or Procedure
- ☐ Housing Relocation
- ☒ Lower Bunk
- ☐ Accessible Cell
- ☐ Accessible Shower

☐ Mobility Aids

- ☐ Cane
- ☐ Crutches
- ☐ Wheelchair
- ☐ Prosthesis

☐ Other

☐ None Requested

Additional Information About the Requested Accommodation or Modification:

3. The facility's approved accommodation plan:

LOW BUNK

Part D: Denial of a Disability Accommodation or Modification

1. Please check all that apply. *Per the Directive, the Field Office Director (FOD) should be notified of all decisions to deny a Detainee's request for an accommodation beyond the provision of medication or medical or mental health care, unless the Detainee is provided an equally effective alternative accommodation.*

☐ **Communication Impairment**

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- ☐ Blind
- ☐ Low Vision
- ☐ Deaf
- ☐ Hard of Hearing
- ☐ Other (Please describe):

☐ **Mobility Impairment-** Detainee has or requires:

- ☐ Wheelchair
- ☐ Crutch(es)
- ☐ Prosthesis
- ☐ Cane
- ☐ Other Device or Assistance (Please describe):

☐ **Intellectual or Cognitive Impairment**

☐ **Dental**

☐ **Other** (Please describe):

2. The accommodations or modifications requested by the Detainee. Please check/list all accommodations and/or modifications requested:

☐ **Auxiliary Aids**

- ☐ Accessible Software
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☐ **Mobility Aids**

- ☐ Cane
- ☐ Crutches
- ☐ Wheelchair
- ☐ Prosthesis

☐ **Other**

☐ **None Requested**

Additional Information About the Requested Accommodation or Modification:

3. Check all the reasons for the denial and include any relevant supporting or additional information:

- ☐ No accommodation or modification was required for the detainee to access the facility's programs or activities.
- ☐ There is no relationship ("nexus") between the detainee's disability and the requested accommodation or modification.
- ☐ Accommodation requested would fundamentally alter the nature of the program, service or activity.
- ☐ Accommodation requested would result in an undue financial and administrative burden.
- ☐ Other

Additional Information about the Reasons for the Denial:

4. Any steps the facility has taken to address the detainee's needs.

Part E: Facility and Field Office Submission Information

1. **Facility Administrator or Designee**

Name of facility staff member completing form (if applicable): (b)(6); (b)(7)(C)

Title of facility staff member completing form (if applicable): Acting HSA

Date submitted: 08/13/2019

2. **ERO Field Office**

Name of ERO Field Office official completing form (if applicable): (b)(6); (b)(7)(C)

Title of ERO Field Office official completing form (if applicable): SDDO

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Additional Information (action(s) taken, recommendations, comments):

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U.S. Immigration and Customs Enforcement

DETAINEE DISABILITY ACCOMMODATION NOTIFICATION

INSTRUCTIONS: **This form is to be completed by Field Office and/or detention facility supervisory-level personnel**

This form is designed to process requests for accommodations and modifications of policies, practices and procedures from and on behalf of detainees with disabilities in order to comply with its obligations under Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794, as amended (Section 504). Per the guidance provided in the ERO Directive 11304, Assessment and Accommodations for Detainees with Disabilities, the FOD shall take steps to ensure that he or she is notified in writing by the facility administrator of any Detainee identified as having a communication or mobility impairment, and any facility denial of a request for an accommodation beyond the provision of medication or medical or mental health care.

Field Office and/or detention facility supervisory personnel should complete Parts A-E, as applicable, and Field Office personnel should sign electronically, if possible. Submit completed forms and any questions to ERO Headquarters at ERO.RA@ice.dhs.gov. Please do not submit non-electronic forms.

Part A: Detainee Information

Last Name: (b)(6); (b)(7)(C)	First Name: (b)(6); (b)(7)(C)
Date of Birth: [REDACTED]	Alien Number: [REDACTED]
AOR: NOL	Facility: PINE PRAIRIE CORRECTIONAL CENTER If not listed, type in the facility: N/A

Part B: Notification Type (To be submitted to the Field Office within 72 hours of a completed assessment)

- ☒ Notification of Detainee Identified with a Communication or Mobility Impairment. **If yes, proceed to Part C of this form.**
- ☐ Notification of Facility Denial of a Requested Accommodation for a Detainee with a Disability. **If yes, proceed to Part D of this form.**

Part C: Communication or Mobility Impairment

1. Please check all that apply. Per the Directive, Detainees with communication impairments include Detainees with physical, hearing, visual, and speech impairments (e.g., Detainees who are deaf or hard of hearing, blind, or nonverbal). Detainees with mobility impairments include Detainees with physical impairments who require a wheelchair, crutches, prosthesis, cane, other mobility device, or other assistance.

☐ Communication Impairment

- ☐ Speech disability (e.g., speech impairment or non-verbal)
- ☐ Blind
- ☐ Low Vision
- ☐ Deaf
- ☐ Hard of Hearing
- ☐ Other (e.g., cognitive or intellectual impairments):

☒ Mobility Impairment (Detainee has or requires)

- ☐ Wheelchair
- ☐ Crutch(es)
- ☐ Prosthesis
- ☐ Cane
- ☒ Other Device or Assistance (Please describe):

LOW BUNK

Additional relevant information about the impairment (Optional).

2. The accommodations or modifications requested by the Detainee. Please check/list all accommodations and/or modifications requested:

☐ Auxiliary Aids

- ☐ Accessible Software
- ☐ Audiotapes
- ☐ Braille Documents
- ☐ Eyeglasses
- ☐ Large Print Documents
- ☐ Hearing Aid
- ☐ Sign Language Interpreter
- ☐ Note Taker

☐ General

- ☐ Modification to the Facility's Policy or Procedure
- ☐ Housing Relocation
- ☒ Lower Bunk
- ☐ Accessible Cell
- ☐ Accessible Shower

☐ Mobility Aids

- ☐ Cane
- ☐ Crutches
- ☐ Wheelchair
- ☐ Prosthesis

☐ Other GROUND FLOOR

☐ None Requested

Additional Information About the Requested Accommodation or Modification:

3. The facility's approved accommodation plan:

LOW BUNK
GROUND FLOOR ONLY

Part D: Denial of a Disability Accommodation or Modification

1. Please check all that apply. *Per the Directive, the Field Office Director (FOD) should be notified of all decisions to deny a Detainee's request for an accommodation beyond the provision of medication or medical or mental health care, unless the Detainee is provided an equally effective alternative accommodation.*

☐ **Communication Impairment**

- ☐ Speech disability (e.g., non-verbal)
- ☐ Blind
- ☐ Low Vision
- ☐ Deaf
- ☐ Hard of Hearing
- ☐ Other (Please describe):

☐ **Mobility Impairment-** Detainee has or requires:

- ☐ Wheelchair
- ☐ Crutch(es)
- ☐ Prosthesis
- ☐ Cane
- ☐ Other Device or Assistance (Please describe):

☐ **Intellectual or Cognitive Impairment**

☐ **Dental**

☐ **Other** (Please describe):

2. The accommodations or modifications requested by the Detainee. Please check/list all accommodations and/or modifications requested:

☐ **Auxiliary Aids**

- ☐ Accessible Software
- ☐ Audiotapes
- ☐ Braille Documents
- ☐ Eyeglasses
- ☐ Large Print Documents
- ☐ Hearing Aid
- ☐ Sign Language Interpreter
- ☐ Note Taker

☐ **General**

- ☐ Modification to the Facility's Policy or Procedure
- ☐ Housing Relocation
- ☐ Lower Bunk
- ☐ Accessible Cell
- ☐ Accessible Shower

☐ **Mobility Aids**

- ☐ Cane
- ☐ Crutches
- ☐ Wheelchair
- ☐ Prosthesis

☐ **Other**

☐ **None Requested**

Additional Information About the Requested Accommodation or Modification:

3. Check all the reasons for the denial and include any relevant supporting or additional information:

- ☐ No accommodation or modification was required for the detainee to access the facility's programs or activities.
- ☐ There is no relationship ("nexus") between the detainee's disability and the requested accommodation or modification.
- ☐ Accommodation requested would fundamentally alter the nature of the program, service or activity.
- ☐ Accommodation requested would result in an undue financial and administrative burden.
- ☐ Other

Additional Information about the Reasons for the Denial:

4. Any steps the facility has taken to address the detainee's needs.

Part E: Facility and Field Office Submission Information

1. **Facility Administrator or Designee**

Name of facility staff member completing form (if applicable): (b)(6); (b)(7)(C)

Title of facility staff member completing form (if applicable): Acting HSA

Date submitted: 08/13/2019

2. **ERO Field Office**

Name of ERO Field Office official completing form (if applicable): (b)(6); (b)(7)(C)

Title of ERO Field Office official completing form (if applicable): SDDO

Date submitted: 08/13/2019

Additional Information (action(s) taken, recommendations, comments):

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

DETAINEE DISABILITY ACCOMMODATION NOTIFICATION

INSTRUCTIONS: **This form is to be completed by Field Office and/or detention facility supervisory-level personnel**

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Field Office and/or detention facility supervisory personnel should complete Parts A-E, as applicable, and Field Office personnel should sign electronically, if possible. Submit completed forms and any questions to ERO Headquarters at ERO.RA@ice.dhs.gov. Please do not submit non-electronic forms.

Part A: Detainee Information

Last Name: (b)(6); (b)(7)(C)	First Name: (b)(6); (b)(7)(C)
Date of Birth:	Alien Number:
AOR: NOL	Facility: PINE PRAIRIE CORRECTIONAL CENTER If not listed, type in the facility: N/A

Part B: Notification Type (To be submitted to the Field Office within 72 hours of a completed assessment)

- ☒ Notification of Detainee Identified with a Communication or Mobility Impairment. **If yes, proceed to Part C of this form.**
- ☐ Notification of Facility Denial of a Requested Accommodation for a Detainee with a Disability. **If yes, proceed to Part D of this form.**

Part C: Communication or Mobility Impairment

1. Please check all that apply. Per the Directive, Detainees with communication impairments include Detainees with physical, hearing, visual, and speech impairments (e.g., Detainees who are deaf or hard of hearing, blind, or nonverbal). Detainees with mobility impairments include Detainees with physical impairments who require a wheelchair, crutches, prosthesis, cane, other mobility device, or other assistance.

☐ Communication Impairment

- ☐ Speech disability (e.g., speech impairment or non-verbal)
- ☐ Blind
- ☐ Low Vision
- ☐ Deaf
- ☐ Hard of Hearing
- ☐ Other (e.g., cognitive or intellectual impairments):

☒ Mobility Impairment (Detainee has or requires)

- ☐ Wheelchair
- ☐ Crutch(es)
- ☐ Prosthesis
- ☐ Cane
- ☒ Other Device or Assistance (Please describe):

LOW BUNK GROUND FLOOR

Additional relevant information about the impairment (Optional).

2. The accommodations or modifications requested by the Detainee. Please check/list all accommodations and/or modifications requested:

☐ Auxiliary Aids

- ☐ Accessible Software
- ☐ Audiotapes
- ☐ Braille Documents
- ☐ Eyeglasses
- ☐ Large Print Documents
- ☐ Hearing Aid
- ☐ Sign Language Interpreter
- ☐ Note Taker

☐ General

- ☐ Modification to the Facility's Policy or Procedure
- ☐ Housing Relocation
- ☒ Lower Bunk
- ☐ Accessible Cell
- ☐ Accessible Shower

☐ Mobility Aids

- ☐ Cane
- ☐ Crutches
- ☐ Wheelchair
- ☐ Prosthesis

☐ Other GROUND FLOOR

☐ None Requested

Additional Information About the Requested Accommodation or Modification:

3. The facility's approved accommodation plan:

LOW BUNK
GROUND FLOOR ONLY

Part D: Denial of a Disability Accommodation or Modification

1. Please check all that apply. *Per the Directive, the Field Office Director (FOD) should be notified of all decisions to deny a Detainee's request for an accommodation beyond the provision of medication or medical or mental health care, unless the Detainee is provided an equally effective alternative accommodation.*

☐ **Communication Impairment**

- ☐ Speech disability (e.g., non-verbal)
- ☐ Blind
- ☐ Low Vision
- ☐ Deaf
- ☐ Hard of Hearing
- ☐ Other (Please describe):

☐ **Mobility Impairment-** Detainee has or requires:

- ☐ Wheelchair
- ☐ Crutch(es)
- ☐ Prosthesis
- ☐ Cane
- ☐ Other Device or Assistance (Please describe):

☐ **Intellectual or Cognitive Impairment**

☐ **Dental**

☐ **Other** (Please describe):

2. The accommodations or modifications requested by the Detainee. Please check/list all accommodations and/or modifications requested:

☐ **Auxiliary Aids**

- ☐ Accessible Software
- ☐ Audiotapes
- ☐ Braille Documents
- ☐ Eyeglasses
- ☐ Large Print Documents
- ☐ Hearing Aid
- ☐ Sign Language Interpreter
- ☐ Note Taker

☐ **General**

- ☐ Modification to the Facility's Policy or Procedure
- ☐ Housing Relocation
- ☐ Lower Bunk
- ☐ Accessible Cell
- ☐ Accessible Shower

☐ **Mobility Aids**

- ☐ Cane
- ☐ Crutches
- ☐ Wheelchair
- ☐ Prosthesis

☐ **Other**

☐ **None Requested**

Additional Information About the Requested Accommodation or Modification:

3. Check all the reasons for the denial and include any relevant supporting or additional information:

- ☐ No accommodation or modification was required for the detainee to access the facility's programs or activities.
- ☐ There is no relationship ("nexus") between the detainee's disability and the requested accommodation or modification.
- ☐ Accommodation requested would fundamentally alter the nature of the program, service or activity.
- ☐ Accommodation requested would result in an undue financial and administrative burden.
- ☐ Other

Additional Information about the Reasons for the Denial:

4. Any steps the facility has taken to address the detainee's needs.

Part E: Facility and Field Office Submission Information

1. **Facility Administrator or Designee**

Name of facility staff member completing form (if applicable): (b)(6);

Title of facility staff member completing form (if applicable): Acting HSA

Date submitted: 08/13/2019

2. **ERO Field Office**

Name of ERO Field Office official completing form (if applicable): (b)(6); (b)(7)(C)

Title of ERO Field Office official completing form (if applicable): SDDO

Date submitted: 08/13/2019

Additional Information (action(s) taken, recommendations, comments):

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

DETAINEE DISABILITY ACCOMMODATION NOTIFICATION

INSTRUCTIONS: **This form is to be completed by Field Office and/or detention facility supervisory-level personnel**

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Field Office and/or detention facility supervisory personnel should complete Parts A-E, as applicable, and Field Office personnel should sign electronically, if possible. Submit completed forms and any questions to ERO Headquarters at ERO.RA@ice.dhs.gov. Please do not submit non-electronic forms.

Part A: Detainee Information

Last Name: (b)(6); (b)(7)(C)	First Name: (b)(6); (b)(7)(C)
Date of Birth: [REDACTED]	Alien Number: [REDACTED]
AOR: NOL	Facility: PINE PRAIRIE CORRECTIONAL CENTER If not listed, type in the facility: N/A

Part B: Notification Type (To be submitted to the Field Office within 72 hours of a completed assessment)

- ☒ Notification of Detainee Identified with a Communication or Mobility Impairment. **If yes, proceed to Part C of this form.**
- ☐ Notification of Facility Denial of a Requested Accommodation for a Detainee with a Disability. **If yes, proceed to Part D of this form.**

Part C: Communication or Mobility Impairment

1. Please check all that apply. Per the Directive, Detainees with communication impairments include Detainees with physical, hearing, visual, and speech impairments (e.g., Detainees who are deaf or hard of hearing, blind, or nonverbal). Detainees with mobility impairments include Detainees with physical impairments who require a wheelchair, crutches, prosthesis, cane, other mobility device, or other assistance.

☐ Communication Impairment

- ☐ Speech disability (e.g., speech impairment or non-verbal)
- ☐ Blind
- ☐ Low Vision
- ☐ Deaf
- ☐ Hard of Hearing
- ☐ Other (e.g., cognitive or intellectual impairments):

☒ Mobility Impairment (Detainee has or requires)

- ☐ Wheelchair
- ☐ Crutch(es)
- ☐ Prosthesis
- ☐ Cane
- ☒ Other Device or Assistance (Please describe):

LOW BUNK GROUND FLOOR

Additional relevant information about the impairment (Optional).

2. The accommodations or modifications requested by the Detainee. Please check/list all accommodations and/or modifications requested:

☐ Auxiliary Aids

- ☐ Accessible Software
- ☐ Audiotapes
- ☐ Braille Documents
- ☐ Eyeglasses
- ☐ Large Print Documents
- ☐ Hearing Aid
- ☐ Sign Language Interpreter
- ☐ Note Taker

☐ General

- ☐ Modification to the Facility's Policy or Procedure
- ☐ Housing Relocation
- ☒ Lower Bunk
- ☐ Accessible Cell
- ☐ Accessible Shower

☐ Mobility Aids

- ☐ Cane
- ☐ Crutches
- ☐ Wheelchair
- ☐ Prosthesis

☐ Other GROUND FLOOR

☐ None Requested

Additional Information About the Requested Accommodation or Modification:

3. The facility's approved accommodation plan:

LOW BUNK
GROUND FLOOR ONLY

Part D: Denial of a Disability Accommodation or Modification

1. Please check all that apply. *Per the Directive, the Field Office Director (FOD) should be notified of all decisions to deny a Detainee's request for an accommodation beyond the provision of medication or medical or mental health care, unless the Detainee is provided an equally effective alternative accommodation.*

☐ **Communication Impairment**

- ☐ Speech disability (e.g., non-verbal)
- ☐ Blind
- ☐ Low Vision
- ☐ Deaf
- ☐ Hard of Hearing
- ☐ Other (Please describe):

☐ **Mobility Impairment-** Detainee has or requires:

- ☐ Wheelchair
- ☐ Crutch(es)
- ☐ Prosthesis
- ☐ Cane
- ☐ Other Device or Assistance (Please describe):

☐ **Intellectual or Cognitive Impairment**

☐ **Dental**

☐ **Other** (Please describe):

2. The accommodations or modifications requested by the Detainee. Please check/list all accommodations and/or modifications requested:

☐ **Auxiliary Aids**

- ☐ Accessible Software
- ☐ Audiotapes
- ☐ Braille Documents
- ☐ Eyeglasses
- ☐ Large Print Documents
- ☐ Hearing Aid
- ☐ Sign Language Interpreter
- ☐ Note Taker

☐ **General**

- ☐ Modification to the Facility's Policy or Procedure
- ☐ Housing Relocation
- ☐ Lower Bunk
- ☐ Accessible Cell
- ☐ Accessible Shower

☐ **Mobility Aids**

- ☐ Cane
- ☐ Crutches
- ☐ Wheelchair
- ☐ Prosthesis

☐ **Other**

☐ **None Requested**

Additional Information About the Requested Accommodation or Modification:

3. Check all the reasons for the denial and include any relevant supporting or additional information:

- ☐ No accommodation or modification was required for the detainee to access the facility's programs or activities.
- ☐ There is no relationship ("nexus") between the detainee's disability and the requested accommodation or modification.
- ☐ Accommodation requested would fundamentally alter the nature of the program, service or activity.
- ☐ Accommodation requested would result in an undue financial and administrative burden.
- ☐ Other

Additional Information about the Reasons for the Denial:

4. Any steps the facility has taken to address the detainee's needs.

Part E: Facility and Field Office Submission Information

1. **Facility Administrator or Designee**

Name of facility staff member completing form (if applicable): (b)(6); (b)(7)(C)

Title of facility staff member completing form (if applicable): Acting HSA

Date submitted: 08/13/2019

2. **ERO Field Office**

Name of ERO Field Office official completing form (if applicable): (b)(6); (b)(7)(C)

Title of ERO Field Office official completing form (if applicable): SDDO

Date submitted: 08/13/2019

Additional Information (action(s) taken, recommendations, comments):

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

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Field Office and/or detention facility supervisory personnel should complete Parts A-E, as applicable, and Field Office personnel should sign electronically, if possible. Submit completed forms and any questions to ERO Headquarters at ERO.RA@ice.dhs.gov. Please do not submit non-electronic forms.

Part A: Detainee Information

Last Name: (b)(6); (b)(7)(C)	First Name: (b)(6); (b)(7)(C)
Date of Birth:	Alien Number:
AOR: NOL	Facility: PINE PRAIRIE CORRECTIONAL CENTER
If not listed, type in the facility: N/A	

Part B: Notification Type (To be submitted to the Field Office within 72 hours of a completed assessment)

- ☒ Notification of Detainee Identified with a Communication or Mobility Impairment. **If yes, proceed to Part C of this form.**
- ☐ Notification of Facility Denial of a Requested Accommodation for a Detainee with a Disability. **If yes, proceed to Part D of this form.**

Part C: Communication or Mobility Impairment

1. Please check all that apply. Per the Directive, Detainees with communication impairments include Detainees with physical, hearing, visual, and speech impairments (e.g., Detainees who are deaf or hard of hearing, blind, or nonverbal). Detainees with mobility impairments include Detainees with physical impairments who require a wheelchair, crutches, prosthesis, cane, other mobility device, or other assistance.

☐ Communication Impairment

- ☐ Speech disability (e.g., speech impairment or non-verbal)
- ☐ Blind
- ☐ Low Vision
- ☐ Deaf
- ☐ Hard of Hearing
- ☐ Other (e.g., cognitive or intellectual impairments):

☒ Mobility Impairment (Detainee has or requires)

- ☐ Wheelchair
- ☐ Crutch(es)
- ☐ Prosthesis
- ☐ Cane
- ☒ Other Device or Assistance (Please describe):

LOW BUNK GROUND FLOOR

Additional relevant information about the impairment (Optional).

2. The accommodations or modifications requested by the Detainee. Please check/list all accommodations and/or modifications requested:

☐ Auxiliary Aids

- ☐ Accessible Software
- ☐ Audiotapes
- ☐ Braille Documents
- ☐ Eyeglasses
- ☐ Large Print Documents
- ☐ Hearing Aid
- ☐ Sign Language Interpreter
- ☐ Note Taker

☐ General

- ☐ Modification to the Facility's Policy or Procedure
- ☐ Housing Relocation
- ☒ Lower Bunk
- ☐ Accessible Cell
- ☐ Accessible Shower

☐ Mobility Aids

- ☐ Cane
- ☐ Crutches
- ☐ Wheelchair
- ☐ Prosthesis

☐ Other GROUND FLOOR

☐ None Requested

Additional Information About the Requested Accommodation or Modification:

3. The facility's approved accommodation plan:

LOW BUNK
GROUND FLOOR ONLY

Part D: Denial of a Disability Accommodation or Modification

1. Please check all that apply. *Per the Directive, the Field Office Director (FOD) should be notified of all decisions to deny a Detainee's request for an accommodation beyond the provision of medication or medical or mental health care, unless the Detainee is provided an equally effective alternative accommodation.*

☐ **Communication Impairment**

- ☐ Speech disability (e.g., non-verbal)
- ☐ Blind
- ☐ Low Vision
- ☐ Deaf
- ☐ Hard of Hearing
- ☐ Other (Please describe):

☐ **Mobility Impairment-** Detainee has or requires:

- ☐ Wheelchair
- ☐ Crutch(es)
- ☐ Prosthesis
- ☐ Cane
- ☐ Other Device or Assistance (Please describe):

☐ **Intellectual or Cognitive Impairment**

☐ **Dental**

☐ **Other** (Please describe):

2. The accommodations or modifications requested by the Detainee. Please check/list all accommodations and/or modifications requested:

☐ **Auxiliary Aids**

- ☐ Accessible Software
- ☐ Audiotapes
- ☐ Braille Documents
- ☐ Eyeglasses
- ☐ Large Print Documents
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☐ **General**

- ☐ Modification to the Facility's Policy or Procedure
- ☐ Housing Relocation
- ☐ Lower Bunk
- ☐ Accessible Cell
- ☐ Accessible Shower

☐ **Mobility Aids**

- ☐ Cane
- ☐ Crutches
- ☐ Wheelchair
- ☐ Prosthesis

☐ **Other**

☐ **None Requested**

Additional Information About the Requested Accommodation or Modification:

3. Check all the reasons for the denial and include any relevant supporting or additional information:

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- ☐ There is no relationship ("nexus") between the detainee's disability and the requested accommodation or modification.
- ☐ Accommodation requested would fundamentally alter the nature of the program, service or activity.
- ☐ Accommodation requested would result in an undue financial and administrative burden.
- ☐ Other

Additional Information about the Reasons for the Denial:

4. Any steps the facility has taken to address the detainee's needs.

Part E: Facility and Field Office Submission Information

1. **Facility Administrator or Designee**

Name of facility staff member completing form (if applicable): (b)(6); (b)(7)(C)

Title of facility staff member completing form (if applicable): Acting HSA

Date submitted: 08/13/2019

2. **ERO Field Office**

Name of ERO Field Office official completing form (if applicable): (b)(6); (b)(7)(C)

Title of ERO Field Office official completing form (if applicable): SDDO

Date submitted: 08/13/2019

Additional Information (action(s) taken, recommendations, comments):

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

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Part A: Detainee Information

Last Name:	(b)(6); (b)(7)(C)	First Name:	(b)(6); (b)(7)(C)
Date of Birth:		Alien Number:	
AOR:	NOL	Facility:	PINE PRAIRIE CORRECTIONAL CENTER If not listed, type in the facility: N/A

Part B: Notification Type (To be submitted to the Field Office within 72 hours of a completed assessment)

- ☒ Notification of Detainee Identified with a Communication or Mobility Impairment. **If yes, proceed to Part C of this form.**
- ☐ Notification of Facility Denial of a Requested Accommodation for a Detainee with a Disability. **If yes, proceed to Part D of this form.**

Part C: Communication or Mobility Impairment

1. Please check all that apply. Per the Directive, Detainees with communication impairments include Detainees with physical, hearing, visual, and speech impairments (e.g., Detainees who are deaf or hard of hearing, blind, or nonverbal). Detainees with mobility impairments include Detainees with physical impairments who require a wheelchair, crutches, prosthesis, cane, other mobility device, or other assistance.

☐ Communication Impairment

- ☐ Speech disability (e.g., speech impairment or non-verbal)
- ☐ Blind
- ☐ Low Vision
- ☐ Deaf
- ☐ Hard of Hearing
- ☐ Other (e.g., cognitive or intellectual impairments):

☒ Mobility Impairment (Detainee has or requires)

- ☐ Wheelchair
- ☐ Crutch(es)
- ☐ Prosthesis
- ☐ Cane
- ☒ Other Device or Assistance (Please describe):

LOW BUNK GROUND FLOOR

Additional relevant information about the impairment (Optional).

2. The accommodations or modifications requested by the Detainee. Please check/list all accommodations and/or modifications requested:

☐ Auxiliary Aids

- ☐ Accessible Software
- ☐ Audiotapes
- ☐ Braille Documents
- ☐ Eyeglasses
- ☐ Large Print Documents
- ☐ Hearing Aid
- ☐ Sign Language Interpreter
- ☐ Note Taker

☐ General

- ☐ Modification to the Facility's Policy or Procedure
- ☐ Housing Relocation
- ☒ Lower Bunk
- ☐ Accessible Cell
- ☐ Accessible Shower

☐ Mobility Aids

- ☐ Cane
- ☐ Crutches
- ☐ Wheelchair
- ☐ Prosthesis

☐ Other GROUND FLOOR

☐ None Requested

Additional Information About the Requested Accommodation or Modification:

3. The facility's approved accommodation plan:

LOW BUNK
GROUND FLOOR ONLY

Part D: Denial of a Disability Accommodation or Modification

1. Please check all that apply. *Per the Directive, the Field Office Director (FOD) should be notified of all decisions to deny a Detainee's request for an accommodation beyond the provision of medication or medical or mental health care, unless the Detainee is provided an equally effective alternative accommodation.*

☐ **Communication Impairment**

- ☐ Speech disability (e.g., non-verbal)
- ☐ Blind
- ☐ Low Vision
- ☐ Deaf
- ☐ Hard of Hearing
- ☐ Other (Please describe):

☐ **Mobility Impairment-** Detainee has or requires:

- ☐ Wheelchair
- ☐ Crutch(es)
- ☐ Prosthesis
- ☐ Cane
- ☐ Other Device or Assistance (Please describe):

☐ **Intellectual or Cognitive Impairment**

☐ **Dental**

☐ **Other** (Please describe):

2. The accommodations or modifications requested by the Detainee. Please check/list all accommodations and/or modifications requested:

☐ **Auxiliary Aids**

- ☐ Accessible Software
- ☐ Audiotapes
- ☐ Braille Documents
- ☐ Eyeglasses
- ☐ Large Print Documents
- ☐ Hearing Aid
- ☐ Sign Language Interpreter
- ☐ Note Taker

☐ **General**

- ☐ Modification to the Facility's Policy or Procedure
- ☐ Housing Relocation
- ☐ Lower Bunk
- ☐ Accessible Cell
- ☐ Accessible Shower

☐ **Mobility Aids**

- ☐ Cane
- ☐ Crutches
- ☐ Wheelchair
- ☐ Prosthesis

☐ **Other**

☐ **None Requested**

Additional Information About the Requested Accommodation or Modification:

3. Check all the reasons for the denial and include any relevant supporting or additional information:

- ☐ No accommodation or modification was required for the detainee to access the facility's programs or activities.
- ☐ There is no relationship ("nexus") between the detainee's disability and the requested accommodation or modification.
- ☐ Accommodation requested would fundamentally alter the nature of the program, service or activity.
- ☐ Accommodation requested would result in an undue financial and administrative burden.
- ☐ Other

Additional Information about the Reasons for the Denial:

4. Any steps the facility has taken to address the detainee's needs.

Part E: Facility and Field Office Submission Information

1. **Facility Administrator or Designee**

Name of facility staff member completing form (if applicable): (b)(6);

Title of facility staff member completing form (if applicable): Acting HSA

Date submitted: 08/13/2019

2. **ERO Field Office**

Name of ERO Field Office official completing form (if applicable): (b)(6); (b)(7)(C)

Title of ERO Field Office official completing form (if applicable): SDDO

Date submitted: 08/13/2019

Additional Information (action(s) taken, recommendations, comments):

Health Summary for Classification

(b)(6); (b)(7)(C)

PPIPC DOA 07/29/2019

I/D/R ID #	Sex	DOB	Facility Name

I. A. Bunk Assignment (check one):

- ☐ 1. No restrictions
☒ 2. Lower bunk only

B. Row Assignment (check one):

- ☐ 1. No restrictions
☐ 2. Ground floor only

II. Work Assignment/Restriction (check all that apply):

- | | |
|---|--|
| ☐ 1. No work restrictions | ☐ 14. No repetitive use of hands |
| ☐ 2. Medically restricted no work | ☐ 15. Do not assign to medical |
| ☐ 3. 4-hour work restriction | ☐ 16. Limit work in direct sunlight to < _____ |
| ☐ 4. 4-hour-limited work restriction | ☐ 17. Limit work when temp. is > _____ |
| ☐ 5. Excuse from school | ☐ 18. Limit work when temp. is < _____ |
| ☐ 6. Limit standing to < _____ | ☐ 19. Limit chemical exposure |
| ☐ 7. No walking > _____ yards | ☐ 20. No work requiring safety boots |
| ☐ 8. No lifting > _____ pounds | ☐ 21. No work around machines with moving parts |
| ☐ 9. No bending at waist | ☐ 22. Limit work exposure to loud noises |
| ☐ 10. No repetitive squatting | ☐ 23. Limit work requiring complex instructions |
| ☐ 11. No climbing | ☐ 24. Sedentary work only |
| ☐ 12. Limit sitting to < _____ | ☐ 25. Other: _____ |
| ☐ 13. No food service | ☐ 26. Other: _____ |
| | ☐ 27. Other: _____ |

III. Disciplinary Process:

- ☐ 1. No restrictions
☐ 2. Medical representative required
☐ 3. Mental health representative required

IV. Transport Process:

- ☐ 1. No Restrictions
☐ 2. EMS Ambulance
☐ 3. Wheelchair Van
☐ 4. Van

IDDM

(b)(6); (b)(7)(C)

RN

Signature/Stamp of Healthcare Provider

7/29/19 1718
Date/Time

Dx: Dm

Health Summary for Classification

(b)(6); (b)(7)(C) PPIPC DOA 07/20/2019	T/M/B M #	Sex	DOB	Facility Name
---	-----------	-----	-----	---------------

I. A. Bunk Assignment (check one):

- ☐ 1. No restrictions
☒ 2. Lower bunk only

B. Row Assignment (check one):

- ☐ 1. No restrictions
☐ 2. Ground floor only

II. Work Assignment/Restriction (check all that apply):

- | | |
|--|--|
| ☐ 1. No work restrictions
☐ 2. Medically restricted no work
☐ 3. 4-hour work restriction
☐ 4. 4-hour-limited work restriction
☐ 5. Excuse from school
☐ 6. Limit standing to < _____
☐ 7. No walking > _____ yards
☐ 8. No lifting > _____ pounds
☐ 9. No bending at waist
☐ 10. No repetitive squatting
☐ 11. No climbing
☐ 12. Limit sitting to < _____
☐ 13. No food service | ☐ 14. No repetitive use of hands
☐ 15. Do not assign to medical
☐ 16. Limit work in direct sunlight to < _____
☐ 17. Limit work when temp. is > _____
☐ 18. Limit work when temp. is < _____
☐ 19. Limit chemical exposure
☐ 20. No work requiring safety boots
☐ 21. No work around machines with moving parts
☐ 22. Limit work exposure to loud noises
☐ 23. Limit work requiring complex instructions
☐ 24. Sedentary work only
☐ 25. Other: _____
☐ 26. Other: _____
☐ 27. Other: _____ |
|--|--|

III. Disciplinary Process:

- ☐ 1. No restrictions
☐ 2. Medical representative required
☐ 3. Mental health representative required

IV. Transport Process:

- ☐ 1. No Restrictions
☐ 2. EMS Ambulance
☐ 3. Wheelchair Van
☐ 4. Van

(b)(6); (b)(7)(C)

RN
Center

JUL 20 2019

Date/Time

1550

DX:
GOUT

Health Summary for Classification

(b)(6); (b)(7)(C)

PPIPC DOA 07/29/2019

R ID #

Sex

DOB

Facility Name

I. A. Bunk Assignment (check one):

- ☐ 1. No restrictions
☒ 2. Lower bunk only

B. Row Assignment (check one):

- ☐ 1. No restrictions
☐ 2. Ground floor only

II. Work Assignment/Restriction (check all that apply):

- ☐ 1. No work restrictions
☐ 2. Medically restricted no work
☐ 3. 4-hour work restriction
☐ 4. 4-hour-limited work restriction
☐ 5. Excuse from school
☐ 6. Limit standing to < _____
☐ 7. No walking > _____ yards
☐ 8. No lifting > _____ pounds
☐ 9. No bending at waist
☐ 10. No repetitive squatting
☐ 11. No climbing
☐ 12. Limit sitting to < _____
☐ 13. No food service

- ☐ 14. No repetitive use of hands
☐ 15. Do not assign to medical
☐ 16. Limit work in direct sunlight to < _____
☐ 17. Limit work when temp. is > _____
☐ 18. Limit work when temp. is < _____
☐ 19. Limit chemical exposure
☐ 20. No work requiring safety boots
☐ 21. No work around machines with moving parts
☐ 22. Limit work exposure to loud noises
☐ 23. Limit work requiring complex instructions
☐ 24. Sedentary work only
☐ 25. Other: _____
☐ 26. Other: _____
☐ 27. Other: _____

III. Disciplinary Process:

- ☐ 1. No restrictions
☐ 2. Medical representative required
☐ 3. Mental health representative required

IV. Transport Process:

- ☐ 1. No Restrictions
☐ 2. EMS Ambulance
☐ 3. Wheelchair Van
☐ 4. Van

(b)(6); (b)(7)(C)

RN

Signature/Stamp of Healthcare Provider

7/24/19
Date/Time

Dx: Seizures

Health Summary for Classification

Inmate/Detainee/Resident (I/D/R)	I/D/R ID #	Sex	DOB	Facility Name
(b)(6); (b)(7)(C)				

PPIPC DOA 07/18/2019

I. A. Bunk Assignment (check one):

- ☐ 1. No restrictions
- ☒ 2. Lower bunk only

B. Row Assignment (check one):

- ☐ 1. No restrictions
- ☒ 2. Ground floor only

II. Work Assignment/Restriction (check all that apply):

- ☐ 1. No work restrictions
- ☐ 2. Medically restricted no work
- ☐ 3. 4-hour work restriction
- ☐ 4. 4-hour-limited work restriction
- ☐ 5. Excuse from school
- ☐ 6. Limit standing to < _____
- ☐ 7. No walking > _____ yards
- ☐ 8. No lifting > _____ pounds
- ☐ 9. No bending at waist
- ☐ 10. No repetitive squatting
- ☐ 11. No climbing
- ☐ 12. Limit sitting to < _____
- ☐ 13. No food service

- ☐ 14. No repetitive use of hands
- ☐ 15. Do not assign to medical
- ☐ 16. Limit work in direct sunlight to < _____
- ☐ 17. Limit work when temp. is > _____
- ☐ 18. Limit work when temp. is < _____
- ☐ 19. Limit chemical exposure
- ☐ 20. No work requiring safety boots
- ☐ 21. No work around machines with moving parts
- ☐ 22. Limit work exposure to loud noises
- ☐ 23. Limit work requiring complex instructions
- ☐ 24. Sedentary work only
- ☐ 25. Other: _____
- ☐ 26. Other: _____
- ☐ 27. Other: _____

III. Disciplinary Process:

- ☐ 1. No restrictions
- ☐ 2. Medical representative required
- ☐ 3. Mental health representative required

IV. Transport Process:

- ☐ 1. No Restrictions
- ☐ 2. EMS Ambulance
- ☐ 3. Wheelchair Van
- ☐ 4. Van

(b)(6); (b)(7)(C)

Signature/Stamp of Healthcare Provider

RN

JUL 18 2019

Date/Time

@2140

DX: (R) FOOT
(R) ANKLE
PAIN

Health Summary for Classification

(b)(6); (b)(7)(C)	#	Sex	DOB	Facility Name
PPIPC DOA 07/24/2019				

I. A. Bunk Assignment (check one):

- ☒ 1. No restrictions
☒ 2. Lower bunk only

B. Row Assignment (check one):

- ☒ 1. No restrictions
☒ 2. Ground floor only

II. Work Assignment/Restriction (check all that apply):

- ☐ 1. No work restrictions
☐ 2. Medically restricted no work
☐ 3. 4-hour work restriction
☐ 4. 4-hour-limited work restriction
☐ 5. Excuse from school
☐ 6. Limit standing to < _____
☐ 7. No walking > _____ yards
☐ 8. No lifting > _____ pounds
☐ 9. No bending at waist
☐ 10. No repetitive squatting
☐ 11. No climbing
☐ 12. Limit sitting to < _____
☐ 13. No food service

- ☐ 14. No repetitive use of hands
☐ 15. Do not assign to medical
☐ 16. Limit work in direct sunlight to < _____
☐ 17. Limit work when temp. is > _____
☐ 18. Limit work when temp. is < _____
☐ 19. Limit chemical exposure
☐ 20. No work requiring safety boots
☐ 21. No work around machines with moving parts
☐ 22. Limit work exposure to loud noises
☐ 23. Limit work requiring complex instructions
☐ 24. Sedentary work only
☐ 25. Other: _____
☐ 26. Other: _____
☐ 27. Other: _____

III. Disciplinary Process:

- ☐ 1. No restrictions
☐ 2. Medical representative required
☐ 3. Mental health representative required

IV. Transport Process:

- ☐ 1. No Restrictions
☐ 2. EMS Ambulance
☐ 3. Wheelchair Van
☐ 4. Van

(b)(6); (b)(7)(C)

RN

Signature/Stamp of Healthcare Provider

JUL 24 2019
Date/Time

DX
LEFT EYE
BLINDNESS

DX: HTN Chronic Back Pain

Health Summary for Classification

(b)(6); (b)(7)(C)	ID #	Sex	DOB	Facility Name
PPIPC DOA 07/17/2018				

I. A. Bunk Assignment (check one):

- ☐ 1. No restrictions
☒ 2. Lower bunk only

B. Row Assignment (check one):

- ☐ 1. No restrictions
☒ 2. Ground floor only

II. Work Assignment/Restriction (check all that apply):

- ☐ 1. No work restrictions
☐ 2. Medically restricted no work
☐ 3. 4-hour work restriction
☐ 4. 4-hour-limited work restriction
☐ 5. Excuse from school
☐ 6. Limit standing to < _____
☐ 7. No walking > _____ yards
☐ 8. No lifting > _____ pounds
☐ 9. No bending at waist
☐ 10. No repetitive squatting
☐ 11. No climbing
☐ 12. Limit sitting to < _____
☐ 13. No food service

- ☐ 14. No repetitive use of hands
☐ 15. Do not assign to medical
☐ 16. Limit work in direct sunlight to < _____
☐ 17. Limit work when temp. is > _____
☐ 18. Limit work when temp. is < _____
☐ 19. Limit chemical exposure
☐ 20. No work requiring safety boots
☐ 21. No work around machines with moving parts
☐ 22. Limit work exposure to loud noises
☐ 23. Limit work requiring complex instructions
☐ 24. Sedentary work only
☐ 25. Other: _____
☐ 26. Other: _____
☐ 27. Other: _____

III. Disciplinary Process:

- ☐ 1. No restrictions
☐ 2. Medical representative required
☐ 3. Mental health representative required

IV. Transport Process:

- ☐ 1. No Restrictions
☐ 2. EMS Ambulance
☐ 3. Wheelchair Van
☐ 4. Van

(b)(6); (b)(7)(C)

Signature/Stamp of Healthcare Provider

(b)(6); (b)(7)(C)

LPN

7-20-18 0300
Date/Time

HX: MVA

Health Summary for Classification

Inmate/Detainee/Resident (I/D/R) Name:	I/D/R #	Sex	DOB	Facility Name
(b)(6); (b)(7)(C)				
PPIPC DOA 07/19/2019				

I. A. Bunk Assignment (check one):

- ☒ 1. No restrictions
☒ 2. Lower bunk only

B. Row Assignment (check one):

- ☒ 1. No restrictions
☒ 2. Ground floor only

II. Work Assignment/Restriction (check all that apply):

- ☐ 1. No work restrictions
☐ 2. Medically restricted no work
☐ 3. 4-hour work restriction
☐ 4. 4-hour-limited work restriction
☐ 5. Excuse from school
☐ 6. Limit standing to < _____
☐ 7. No walking > _____ yards
☐ 8. No lifting > _____ pounds
☐ 9. No bending at waist
☐ 10. No repetitive squatting
☐ 11. No climbing
☐ 12. Limit sitting to < _____
☐ 13. No food service

- ☐ 14. No repetitive use of hands
☐ 15. Do not assign to medical
☐ 16. Limit work in direct sunlight to < _____
☐ 17. Limit work when temp. is > _____
☐ 18. Limit work when temp. is < _____
☐ 19. Limit chemical exposure
☐ 20. No work requiring safety boots
☐ 21. No work around machines with moving parts
☐ 22. Limit work exposure to loud noises
☐ 23. Limit work requiring complex instructions
☐ 24. Sedentary work only
☐ 25. Other: _____
☐ 26. Other: _____
☐ 27. Other: _____

III. Disciplinary Process:

- ☐ 1. No restrictions
☐ 2. Medical representative required
☐ 3. Mental health representative required

IV. Transport Process:

- ☐ 1. No Restrictions
☐ 2. EMS Ambulance
☐ 3. Wheelchair Van
☐ 4. Van

(b)(6); (b)(7)(C)

Signature/Stamp of Healthcare Provider

JUL 20 2019

Date/Time

DX: SEIZURES

Health Summary for Classification

Inmate/Detainee/Resident (I/D/R) Name:	I/D/R ID # (b)(6); (b)(7)(C)	Sex	DOR	Facility Name
PPIPC DOA 07/19/2019				

I. A. Bunk Assignment (check one):

- ☒ 1. No restrictions
☒ 2. Lower bunk only

B. Row Assignment (check one):

- ☒ 1. No restrictions
☒ 2. Ground floor only

II. Work Assignment/Restriction (check all that apply):

- ☐ 1. No work restrictions
☐ 2. Medically restricted no work
☐ 3. 4-hour work restriction
☐ 4. 4-hour-limited work restriction
☐ 5. Excuse from school
☐ 6. Limit standing to < _____
☐ 7. No walking > _____ yards
☐ 8. No lifting > _____ pounds
☐ 9. No bending at waist
☐ 10. No repetitive squatting
☐ 11. No climbing
☐ 12. Limit sitting to < _____
☐ 13. No food service

- ☐ 14. No repetitive use of hands
☐ 15. Do not assign to medical
☐ 16. Limit work in direct sunlight to < _____
☐ 17. Limit work when temp. is > _____
☐ 18. Limit work when temp. is < _____
☐ 19. Limit chemical exposure
☐ 20. No work requiring safety boots
☐ 21. No work around machines with moving parts
☐ 22. Limit work exposure to loud noises
☐ 23. Limit work requiring complex instructions
☐ 24. Sedentary work only
☐ 25. Other: _____
☐ 26. Other: _____
☐ 27. Other: _____

III. Disciplinary Process:

- ☐ 1. No restrictions
☐ 2. Medical representative required
☐ 3. Mental health representative required

IV. Transport Process:

- ☐ 1. No Restrictions
☐ 2. EMS Ambulance
☐ 3. Wheelchair Van
☐ 4. Van

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)

Signature/Stamp of Healthcare Provider

JUL 20 2019

Date/Time

@0450

*DX: PREVIOUS
BILATERAL
KNEE INJURIES*

From: (b)(6); (b)(7)(C)
Sent: 6 Feb 2020 16:19:41 +0000
To: (b)(6); (b)(7)(C)
Subject: Re: [EXTERNAL] RE: Religious Services POC?
Attachments: HumanRightsESG2018.pdf

As discussed.

From: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@ice.dhs.gov>
Date: Thursday, February 6, 2020 at 8:23 AM
To: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@geogroup.com>
Subject: [EXTERNAL] RE: Religious Services POC?

(b)(6); (b)(7)(C)

I have no meetings tomorrow/Friday morning. If there is a particular time that works for you, I can call you.

I am out of the office all next week...

(b)(6); (b)(7)(C)

202 907 3 (b)(6); (b)(7)(C)

From: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@geogroup.com>
Sent: Wednesday, February 5, 2020 6:39 PM
To: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@ice.dhs.gov>
Subject: Re: Religious Services POC?

H (b)(6); (b)(7)(C)

Good to hear from you! I'd love to catch up. Let me know what's a good time, and I hope all is well.

Let me see who is the best POC. It may still be (b)(6); (b)(7)(C)

Best,

(b)(6); (b)(7)(C)

Get [Outlook for iOS](#)

From: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@ice.dhs.gov>
Sent: Wednesday, February 5, 2020 5:14:04 PM
To: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@geogroup.com>
Subject: [EXTERNAL] Religious Services POC?

Good afternoon (b)(6); (b)(7)(C)

I hope this note finds you well. I have a quick question. One of my team members who works on religious services is interested in connecting with someone at GEO who works on these issues. Previously, I believe we worked with (b)(6); (b)(7)(C) Can you tell me who would be a good POC. No issues, my team member just wants to pro-actively connect about chaplains, religious services, etc.

Separately, I would love to catch up with you sometime soon. I am working with a larger portfolio involving a number of special populations in custody and enjoying it...

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C) hit Chief
Special Populations and Programs
Custody Programs Division
Enforcement and Removal Operations (ERO)
U.S. Immigration and Customs Enforcement (ICE) | Department of Homeland Security (DHS)
202.907.3 (b)(6); (b)(7)(C) ell
(b)(6); (b)(7)(C) ce.dhs.gov



Homeland
Security

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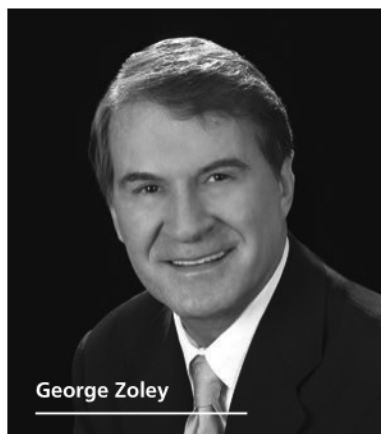


The GEO Group, Inc. ®

HUMAN RIGHTS AND ESG REPORT

2018

Human Rights & ESG Report



For more than 30 years, The GEO Group has been a trusted service provider to federal, state and local government agencies in the United States, delivering quality management and care for secure institutions, ICE processing centers, and community reentry facilities. Over the years, our company has evolved to become a leading provider of offender rehabilitation, post release services, and community-based programs.

Our three-decade long journey has been driven by a daily pursuit of operational excellence across all our service lines. We recognize that achieving excellence on a consistent basis requires frequent introspection and a commitment to taking steps to improve upon what we do every day.

This commitment led us to invest in a regional operating structure approximately two decades ago, bringing the daily oversight of our facilities closer to our clients and ensuring that we are able to respond as quickly as possible to any challenges that may arise in the delivery of our services. Today, our three regional offices are comprised of subject matter experts who provide direct oversight for our secure facilities across the United States.

Our commitment to continuous improvement also led us to pursue third-party accreditation for all our U.S. secure facilities, regardless of contractual requirements, as well as, all applicable non-secure community reentry facilities. This independent accreditation is based on standards set by leading organizations such as the American Correctional Association, the National Commission on Correctional Health Care, and The Joint Commission, among other entities. Today, our U.S. facilities are accredited by the American Correctional Association with an average accreditation score of 99.6 percent.

We are particularly proud of the commitment we have made as a company to improve the lives of those entrusted to our care by providing rehabilitation and reentry programs that can reduce recidivism and help them reintegrate into society.

Our GEO Continuum of Care® (CoC) integrates enhanced offender rehabilitation, including cognitive behavioral treatment, with post-release support services to address basic community needs including housing, transportation, food, clothing, and job placement assistance.

This innovative program began as a pilot at one GEO facility in 2015 and received the 'Innovation in Corrections' award from the American Correctional Association just three years later in 2018. We expect the CoC program to be expanded to include 23 GEO facilities by the end of 2020. GEO's 2019 annual funding commitment in support of the CoC program is approximately \$10 million, representing approximately 7% of GEO's net income.

The expansion of our GEO Continuum of Care® has led to an increase in the number of GED/High School Equivalency degrees, vocational training certifications, and substance abuse treatment completions awarded annually throughout our facilities.

These efforts are representative of our company's willingness to look inward for areas where we can improve on our delivery of services and programs. The publication of our first Human Rights and Environmental, Social & Governance (ESG) report is another step in that direction. As a company, we formalized our long-standing commitment to respecting human rights when our Board adopted a Global Human Rights Policy in 2013.

This report builds on that important milestone by providing disclosures related to how we inform our employees of our company's commitment to respecting human rights; the criteria we use to assess human rights performance; and our contract compliance program, remedies to shortcomings in human rights performance, and independent verification of our performance by third party organizations.

The report also addresses criteria, based on recognized ESG reporting standards, related to the development of our employees; our efforts to advance environmental sustainability in the construction and operation of our facilities; and our adherence to ethical governance practices throughout our company.

We are cognizant of the interest from our stakeholders in learning more about our company. We welcome this opportunity to constructively engage with our stakeholders, as we further refine our Human Rights and ESG disclosures going forward.

A handwritten signature in dark ink that reads "George Zoley".

George Zoley

Chairman, CEO and Founder

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DISCLAIMER STATEMENT

DISCLAIMER STATEMENT

GEO's Human Rights and ESG Report addresses the company's aspirational goals as a leading government services provider. Even with the best of intentions, and a sincere effort to follow our thoughtfully developed operational policies, there will at times unfortunately be shortcomings in our company's performance. Our 23,000 employees, who often face difficult operational challenges, are not always able to achieve their best efforts and the company's desired best outcomes.

FORWARD-LOOKING INFORMATION

This report contains certain forward-looking statements based on our management's current assumptions and expectations, including statements regarding our goals, commitments, programs and other business plans, initiatives and objectives. These statements are typically accompanied by the words "expect," "may," "could," "hope," "believe," "would," "might," "estimate," "anticipate," "plan," "aspire" or similar words. All such statements are intended to enjoy the protection of the safe harbor for forward-looking statements provided by the Private Securities Litigation Reform Act of 1995, as amended.

Although we believe there is a reasonable basis for the forward-looking statements made in this report, our actual future results, including the achievement of our targets, goals or commitments, could differ materially from our projected results as the result of changes in circumstances, assumptions not being realized, or other risks, uncertainties and factors. Such risks, uncertainties and factors include the risk factors discussed in Item 1A of our most recent Annual Report on Form 10-K filed with the Securities and Exchange Commission ("SEC") and our subsequent Quarterly Reports on Form 10-Q, as well as, with respect to our goals



GEO Headquarters

and commitments outlined in this report or elsewhere, the challenges, assumptions, risks, uncertainties and other factors identified in this report. You should consider the forward-looking statements in this report in conjunction with our Annual Report on Form 10-K and our subsequent Quarterly Reports on Form 10-Q and Current Reports on Form 8-K filed with the SEC.

The forward-looking statements in this report are made as of the date of this report, unless otherwise indicated, and we undertake no obligation to update these forward-looking statements to reflect subsequent events or circumstances.

DHS-ICE-19-0926-C-000032

COMPANY OVERVIEW ABOUT THE GEO GROUP



Human Rights & ESG Report

The GEO Group, Inc. (NYSE:GEO) is a publicly-traded, fully-integrated real estate investment trust (“REIT”) specializing in the design, financing, development, and operation of secure facilities, processing centers, and community reentry centers in the United States, Australia, South Africa, and the United Kingdom.

GEO provides complementary, turnkey solutions for numerous government agencies worldwide across a spectrum of diversified secure facility management, in-custody rehabilitation, community reentry programs, and electronic monitoring services.

As of December 31, 2018, GEO’s worldwide operations included the ownership and/or management of approximately 96,000 beds at 133 secure facilities, processing centers and community reentry centers, with a growing workforce of approximately 23,000 professionals.

Our corporate office is located in Boca Raton, Florida, and we have three regional offices, located in Los Angeles, California; San Antonio, Texas; and Charlotte, North Carolina.

GEO is organized into two business units: GEO Secure Services and GEO Care.

Throughout 2018, our GEO Secure Services business unit served over 300,000 individuals, while managing an average daily population of more than 60,000 in our state and federal facilities in the United States. Our GEO Care business unit served close to 700,000 individuals during the year, while managing an average daily census of 200,000 participants in our community reentry, youth services treatment, and electronic monitoring programs.

From the development and management of modern facilities to the provision of evidence-based rehabilitation and post-release support in the community, GEO offers fully-diversified, high-quality services to government agencies around the world. GEO operates in several different areas, including:

GEO’S WORLDWIDE OPERATIONS

96,000 Beds

133 Secure facilities, processing centers and community reentry centers

23,000 Professional Workforce

Federal services

GEO contracts with three federal agencies: Federal Bureau of Prisons (BOP), U.S. Marshals Service (USMS), and U.S. Immigration and Customs Enforcement (ICE).

State facilities

GEO manages correctional and rehabilitation facilities on behalf of state correctional agencies (i.e. departments of corrections) in the U.S.

County and local services

GEO manages a small number of county jails for local jurisdictions in the U.S.

Community re-entry services

GEO provides services in residential and non-residential reentry centers under contract with federal, state and local government agencies; these centers allow individuals to receive community services such as education, cognitive behavioral treatment, and employment assistance.

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Youth treatment

Abraxas Youth Services manages youth treatment facilities, serving youthful individuals on behalf of state and local government agencies.

Electronic monitoring

Our BI subsidiary is a leading provider of electronic monitoring services -- including radio frequency, GPS, and alcohol monitoring technologies -- to federal, state, and local government agencies. At the federal level, BI provides electronic monitoring and case management services to ICE under the Alternatives to Detention Program, known as the Intensive Supervision and Appearance Program (ISAP).

Secure transportation

GEO's transportation division, GEO Transport, Inc. provides secure ground and air transfer services to federal, state, and local government customers in the U.S. and internationally.

Over the years, GEO and each of our employees have operated with a strong commitment to comply with all requirements set by our customers, and applicable regulatory authorities and oversight agencies -- especially those involving the safety and security of our employees, the individuals in our care, and the contractors and visitors at each of the facilities we operate.

We are constantly exploring ways to enhance care and improve outcomes as we aspire to be a leading provider of in-custody rehabilitation and community re-entry services. We established the GEO Continuum of Care® concept to provide enhanced, in-custody rehabilitation programs, including cognitive behavioral treatment, integrated with post-release support services.

This program has been steadily expanded to include 20 facilities at the end of 2019 with three (3) more planned by the end of 2020. Our evidence-based treatment begins with individualized risks and needs assessments and offers several unique and enhanced programs.

More details are provided in the Making an Impact: Addressing Recidivism section of this report, as well as, on our website at:
www.geogroup.com/GEOs_Continuum_of_Care



GEO aspires to be a leading provider of evidence-based rehabilitation across a diversified spectrum of secure and community reentry facilities and programs. We have refined and expanded our rehabilitation programs to reach greater numbers of individuals in our care and post-release through our GEO Continuum of Care®*.

GEO's diversified services platform provides organizational capabilities for the delivery of educational and vocational programs, substance abuse treatment, and faith-based services. The GEO Continuum of Care® integrates enhanced in-custody rehabilitation programs, including cognitive behavioral treatment, with post-release support services.



OUR MISSION

GEO's mission is to develop innovative public-private partnerships with government agencies around the globe that deliver high quality secure facility, community reentry, and electronic monitoring services, while providing enhanced rehabilitation and community reintegration programs to the men and women entrusted to our care.



OUR VALUES

Respecting Human Dignity and Rights

We believe every human being should be treated with dignity and that his or her basic human rights should be respected and preserved at all times.

Providing Leading, Evidence-Based Rehabilitation Programs

We are committed to providing leading, evidence-based rehabilitation programs to the men and women entrusted to our care.

Imparting a Safe and Secure Environment

We are committed to establishing and maintaining a workplace that is safe, secure and humane, not only for our trained and experienced professionals, but for the men and women entrusted to our care.

Maintaining Quality Facilities

We are committed to maintaining modern facilities that provide a safe and humane environment and adhere to independent accreditation standards.

*See section of ESG Report on Making an Impact: Addressing Recidivism and details provided on the GEO website at: www.geogroup.com/GEOs_Continuum_of_Care



GEO GROUP ESG PROCESS, RATIONALE AND OBJECTIVES



This is GEO’s first Human Rights and ESG report developed referencing the GRI Standards (Global Reporting Initiative) and the UN Guiding Principles on Business and Human Rights. During the development of this report, we have engaged with many of our stakeholders to integrate their viewpoints into which areas of ESG we should focus on as a company.

We reference these two globally-accepted frameworks to provide our stakeholders, including investors, a standardized and transparent disclosure process in assessing our progress in the critical environmental, social responsibility and corporate governance (ESG) aspects of our organization.

As all of us at GEO continue our sustainability journey, we look forward to working with our stakeholders to evaluate our efforts for achieving continuous improvements in ESG.

BUILDING ON LONGSTANDING COMMITMENTS TO HUMAN RIGHTS AND SUSTAINABILITY

From a startup company more than 30 years ago, GEO has grown rapidly over the years to become a leader in the delivery of secure facility services, community reentry programs, and evidence-based rehabilitation. We have expanded both domestically and internationally and currently operate 133 facilities on behalf of government customers across four continents.

Dating back to our earliest years, we have operated with a strong commitment to ethics in all aspects of our business and to respecting the human rights of all persons in our care.

Across the U.S. and in all parts of the world where we operate, we comply with strict standards established by our customers, including the U.S. federal government, state governments, and local jurisdictions. We also adhere to operational and management guidelines developed by the numerous accrediting entities applicable to our operations.

We have worked closely with stakeholders, including numerous faith-based organizations and non-governmental organizations (NGOs) to expand the developmental, educational and employment opportunities available to those in our care. We also provide extensive training for our employees in compliance with the requirements of our government customers to prepare them to meet the rigorous performance objectives of the positions they hold within our organization.

GEO recognizes its commitment to all of our stakeholders and strives to be the best organization we can be for everyone in our care, our employees, the communities in which we operate, and our investors, as well as, the many businesses, religious and faith-based groups, unions and other organizations with which we have relationships. We strive daily to provide pathways and ongoing support for those in our care to achieve their rehabilitation objectives and re-enter their communities as productive citizens.

We recognize that our challenges continue to evolve, in some instances becoming increasingly complex. In response, we are continuing to take steps to enhance and improve our organizational capabilities and develop new resources to meet changing societal needs. Several years ago, we undertook a pilot initiative -- known as the GEO Continuum of Care® -- to address the challenge of recidivism.

This award-winning program – which we have continually refined and expanded – has proven effective at helping those in our care change their perspective, earn educational and vocational credentials as they prepare for re-entry into society, receive support upon release, and significantly improve their opportunities for personal success.

Today, communities throughout the country, as well as, many individuals in our care, face the challenge of dealing with the devastating epidemic of opioid addiction. We have been working with our stakeholders and those in the medical community to find effective ways to help victims of addiction survive and emerge from their dependencies.

Our team is working hard to ensure that our approach continues to produce higher rates of successful outcomes for those in our care. *[For more details, see section Making an Impact: Addressing Recidivism.]*

OUR COMMITMENT TO RESPECTING HUMAN RIGHTS

For more than three decades, GEO has maintained a strong commitment to respect human rights, extending to all of our approximately 23,000 employees and contractors and more than 250,000 individuals in our care at any given time.

Our board of directors formalized this longstanding commitment with the adoption of a Global Human Rights Policy in 2013, in recognition of the critical role that respect for human rights plays in our operations in the United States and around the world.

As part of this policy, we provide a safe, secure environment, nutrition, clothing, sanitation, and timely access to medical and dental care as required by our government contracts. At all of our facilities, we provide climate-controlled environments for those in our care, which is particularly important since many of our facilities are located in areas prone to intense heat or weather conditions. *[For more details, see section Our Commitment to Respecting Human Rights.]*

We embrace diversity across our enterprise. Women and minorities account for the majority of our U.S. employee population and comprise a significant percentage of our officers and managers at all levels of our organization. *[For more details, see section Creating Opportunities: Developing Our People.]*

Regarding environmental responsibility, we have been tracking our utilities at each of our facilities for the past several years in an effort to encourage conservation and sustainability. We have embraced green building concepts at all of our new facilities and in the refurbishment or revitalization of our existing facilities. *[For more details, see section Energy and Environmental Sustainability.]*

Our board is composed of a majority of independent directors, and we are diligent in all of the various aspects of corporate governance and investor relations.



**UNITED NATIONS
HUMAN RIGHTS**
OFFICE OF THE HIGH COMMISSIONER

REFERENCING THE GRI STANDARDS AND UN GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS

Even as we have embraced many elements associated with a sustainable enterprise, we recognize the need for a transparent and disciplined enterprise-wide approach.

In our pursuit of this type of approach, we have referenced the GRI Standards and The UN Guiding Principles on Business and Human Rights in developing this report, and we have begun with the following set of ongoing objectives:

- Provide greater transparency for our stakeholders and the general public with respect to our various efforts in all our facilities aimed at respecting human rights.
- Enhance our ability to flag potential issues in all areas of our operations and compress the time it takes to respond with corrective measures.
- Use widely accepted methodologies for evaluating performance and setting objectives for improvements in corporate governance, corporate social policy, environmental impact and energy conservation.

In the process of gathering and preparing content for this initial report, which covers 2018 with supporting data from 2016-2018 where possible, we have been able to establish a baseline for many of the activities that we plan to evaluate and report on over time.



HUMAN RIGHTS REPORT

**ORGANIZATION OF HUMAN RIGHTS
AND ENVIRONMENTAL, SOCIAL, AND
GOVERNANCE (ESG) REPORT**

GEO's first Human Rights and ESG Report is organized as follows. The Human Rights Report is addressed first and is structured in the following manner:

- I. How GEO ensures that its employees are aware of, and know how to apply, the company's commitment to inmate/detainee human rights;
- II. Criteria/metrics used to assess human rights performance; and
- III. Contract compliance program, GEO remedies to shortcomings in human rights performance, and independent verification of GEO performance by third party organizations

GEO's Human Rights Report is followed by GEO's ESG Report.

This report addresses how GEO respects, and implements its respect for, human rights among its secure residential care facilities involving inmates or detainees. But before we begin that discussion, we would like to make the readers aware of services that we do not provide.

WHAT WE DON'T DO

- **We don't manage any shelters or facilities housing unaccompanied minors.**
- **We don't manage any border patrol holding facilities along the U.S. Southwest border.**
- **We don't manage any facilities with tent structures or chain-link fencing in housing areas.**
- **We don't play a role in advocating for criminal justice or immigration laws.**

WHAT WE DO

- **GEO is proud to be a world leader in offender rehabilitation that we provide at eighteen (18) state correctional facilities through the GEO Continuum of Care® program.**
- **The GEO Continuum of Care® (CoC) is enhanced in-custody offender rehabilitation programming, including cognitive behavioral treatment, integrated with post-release support services.**
- **At the Corporate Office level, the CoC Program is administered by the GEO Continuum of Care® (CoC) Division which has expanded to 50 staff with subject matter experts in education, cognitive behavioral treatment, substance abuse treatment, post-release services, CoC training, and quality assurance.**
- **During 2019, GEO increased its annual commitment for CoC funding to \$10 million representing approximately 7% of the company's net annual profits.**
- **On any typical day, there are approximately 30,000 participants enrolled in GEO offender rehabilitation programming, which resulted in 6.7 million programming hours completed during 2018.**
- **GEO's focus on offender rehabilitation assisted individuals in achieving the following in 2018:**
 - **2,779 High School Equivalency Diplomas**
 - **9,131 Vocational Certificates**
 - **8,842 Substance Abuse Certificates**
 - **44,518 Programming Completions**
 - **32,419 Behavioral Program Completions**
- **GEO's CoC rehabilitation program includes cognitive behavioral therapy that identifies the individual's criminogenic risks and develops an appropriate treatment plan.**

- The Corporate CoC Division Case Managers coordinate with the facility Case Managers regarding the progress and eventual release of the CoC offender participants.
- At GEO's Corporate Office, 12 Post-Release Case Managers provide post-release support services on a 24/7 basis, aiding offenders in fulfilling their most critical needs following release back into the community. Needs include housing, clothing, food, employment, and transportation assistance.
- On a daily basis, the GEO Post-Release Case Managers are supporting over 1,300 individuals reintegrating into their communities through our post-release support services.
- On January 8, 2018, GEO was proud to accept the "Innovation in Corrections" Award at the American Correctional Association (ACA) Winter Conference in Orlando, Florida for the GEO Continuum of Care® Program at the Graceville Correctional and Rehabilitation Facility in Florida.
- During 2019, we were very pleased to be able to expand the number of CoC facilities to 20. This is being accomplished through additional funding by the states of California and Oklahoma, as well as GEO.
- For 2020, we expect to further expand the CoC Program to an additional three (3) facilities bringing the total CoC facilities to 23 which will include every GEO-managed state facility.
- All of GEO's facilities are highly rated by independent accreditation entities including:
 - The American Correctional Association;
 - The National Commission on Correctional Health Care; and
 - The Joint Commission.
- We advocate for public-private partnerships that deliver private sector solutions to public sector challenges with strict government oversight.
- The facilities we manage typically have on-site, full-time government monitors.
- We manage modern immigration processing facilities under contracts with the U.S. Immigration and Customs Enforcement (ICE), which have such amenities as:
 - Artificial turf soccer fields;
 - Flat screen TVs in living areas;
 - Indoor and outdoor recreation;
 - Classrooms;
 - Multipurpose rooms; and
 - Libraries.
- We proudly operate our ICE processing centers in accordance with the Obama-Biden Administration's Performance-Based National Detention Standards (PBNDS) inclusive of applicable waivers.
- We provide safe and humane residential care for civilly-detained individuals during the adjudication of their immigration cases, with an average length of stay of 50 to 60 days.
- The professional services that we provide today, at the ICE Processing Facilities that we manage, are no different from the services we provided for eight years under the Obama-Biden Administration.
- We manage federal facilities for the U.S. Bureau of Prisons that are reserved almost exclusively for non-citizen criminal aliens.
- We note that the overwhelming majority of correctional and detention facilities in the United States are managed and operated by public governmental agencies. Less than 7% are managed and/or operated by private contractors.

GEO HUMAN RIGHTS REPORT: OUR COMMITMENT TO RESPECTING HUMAN RIGHTS



I. GEO ENSURES THAT ITS EMPLOYEES ARE AWARE OF, AND KNOW HOW TO APPLY, THE COMPANY'S COMMITMENT TO INMATE/DETAINEE HUMAN RIGHTS

We acknowledge that the human rights of all persons who we employ or who may be in our care are to be respected without discrimination, bias, or favoritism. To reinforce our commitment to respect the human rights of all who we care for or employ, we promote and support that commitment through company-wide awareness and training programs.

Human rights awareness and training of our staff promotes the understanding that it is everyone's responsibility to make the respect for human rights a part of all decision making. Our human rights training represents an important investment in our ongoing efforts to achieve a culture in which the human rights of all persons are valued and respected.

All new GEO employees -- including our facility and program staff who work directly with any individuals in our care -- are required to complete our human rights training. The GEO Group human rights training module is available on our website and can be accessed at: www.geogroup.com/Portals/0/Human_Rights_Training.pdf

- GEO's Commitment to Human Rights
- Core Correctional Practices
- Social and Cultural Awareness
- Understanding the Individuals in our Care
- Workplace Violence Prevention Program
- Suicide Awareness and Intervention
- Interpersonal Communication Skills
- Prison Rape Elimination Act (PREA) Training
- Staff Professionalism and Ethics
- Facility Grievance Procedures
- Health Insurance Portability and Accountability Act (HIPAA)
- Telephone, Mail and Visiting Procedures
- Religious Opportunities
- Accountability and Security Procedures
- Life Safety and Emergency Procedures
- Use of Force Regulations and Procedures
- Emergency Planning and Response Procedures
- Facility Disciplinary Procedures
- Search Procedures
- CPR, AED and Basic First Aid
- Report Writing
- Personal Protective Equipment
- Giving Direction
- Contingency Management
- Universal Precautions



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In addition, GEO has a robust training program for staff at all levels of the organization. Our training of managerial, administrative, and security staff is based on American Correctional Association (ACA) standards. The training is a minimum of 120 hours of training within the staff member's first year of employment and 40 hours of recurring training in each consecutive year of employment.

Training includes classroom, practical exercises, course examinations, and on-the-job training. GEO's corporate policy mandates that every new employee receive orientation training prior to undertaking any assignments.

Contractor and Volunteer Training

GEO has developed a training format designed to introduce all contractors and volunteers to our facilities and programs. This is a self-paced course that must be completed prior to beginning their services. The course includes GEO's Commitment to Human Rights, Facility Rules and Regulations, Inmate/Resident Rights and Responsibilities, and Entry and Exit Procedures.

Continuum of Care Training Institute

The GEO Continuum of Care® Training Institute trains all staff from the time of hire and regularly throughout their employment. Our staff development plans include basic training, refresher training, advanced training, skillset certifications, and new manager's training.

Staff also receive training on contract-specific requirements, communication and de-escalation skills, self-defense, group facilitation, and our internal proprietary case management system. In addition, we provide training on Evidenced Based Practices, Motivational Interviewing techniques, Trauma Informed Care, and training specific to the types of programs offered to participants.

Online Learning Management System

To provide our employees with the most up-to-date training materials, online courses, and training reporting, we use an internal, online Learning Management System. This system is available to employees 24/7 and includes self-guided courses and reference materials for various topics.



Training Workshop

*Minimum 120
hours of training
within the first year
of employment.*

II. CRITERIA/METRICS USED TO ASSESS HUMAN RIGHTS PERFORMANCE REGARDING INMATES AND DETAINEES

GEO acknowledges the unique nature of its operations as a provider of management services for correctional and immigration processing facilities. We recognize the significant role that respect for human rights plays in our operations in the United States and around the world.

- Safe and Humane Environment
- Access to Healthcare
- Access to Legal Services
- Access to Family / Friends Communications
- Access to Religious Opportunities
- Access to Safe and Nutritious Meals
- Access to Recreational Amenities
- Access to Rehabilitation Programs for State Inmates

• SAFE AND HUMANE ENVIRONMENT

We respect the right of all persons to have a safe and humane environment, and our commitment to this right is unwavering. Our goal of ensuring a safe and humane environment for everyone in our care calls for us to follow many sets of client standards that define and proscribe the daily operation of our facilities and programs.

We think it is important to point out the difference in staffing for civil detention at GEO's ICE processing centers, versus that of GEO's state correctional facilities. The additional staffing at GEO's ICE processing centers is necessary to comply with the civil detention standards established under President Obama's administration and continued under President Trump's administration.

Overall staffing at GEO's ICE processing centers is approximately 30% more than that of GEO's state correctional facilities. The additional general staffing is needed to provide more (direct) supervision and transportation services for ICE detainees.

Healthcare staffing at GEO's ICE processing centers is approximately 117% more than that of GEO's state correctional facilities. The additional healthcare staffing is needed to provide appropriate treatment for detainees who have numerous health and mental health needs due to arriving from countries with limited healthcare services.



GEO Medical Staff at Broward Transitional Center



GEO Officer at Broward Transitional Center



GEO Educational Program at Broward Transitional Center

GEO facilities, compared to government facilities, are newer, air-conditioned, and provide better living conditions and enhanced rehabilitation programs:

- **95% of GEO's facilities are less than 25 years old, compared with 33% of all state correctional facilities in the United States that are less than 25 years old**
- **100% of GEO's facilities are air-conditioned**
- **100% of the 800 academic and vocational classrooms in GEO's facilities have electronic SMART Boards for interactive computer assisted curriculum**
- **18 GEO state facilities provide the Continuum of Care Program with additional rehabilitation staffing to foster improved case management, cognitive behavioral treatment, basic education, vocational training, and post release services**
- **Average daily attendance in vocational and academic programs was 30,000 in 2018**
- **2,779 high school equivalency degrees were awarded in 2018, along with 9,131 vocational certifications**
- **Most GEO facilities for ICE and the BOP have artificial turf soccer fields and covered pavilions**
- **All GEO facilities have flat screen TVs in the housing areas, legal libraries and general libraries**

Montgomery ICE Processing Center



Blackwater River Correctional and Rehabilitation Facility

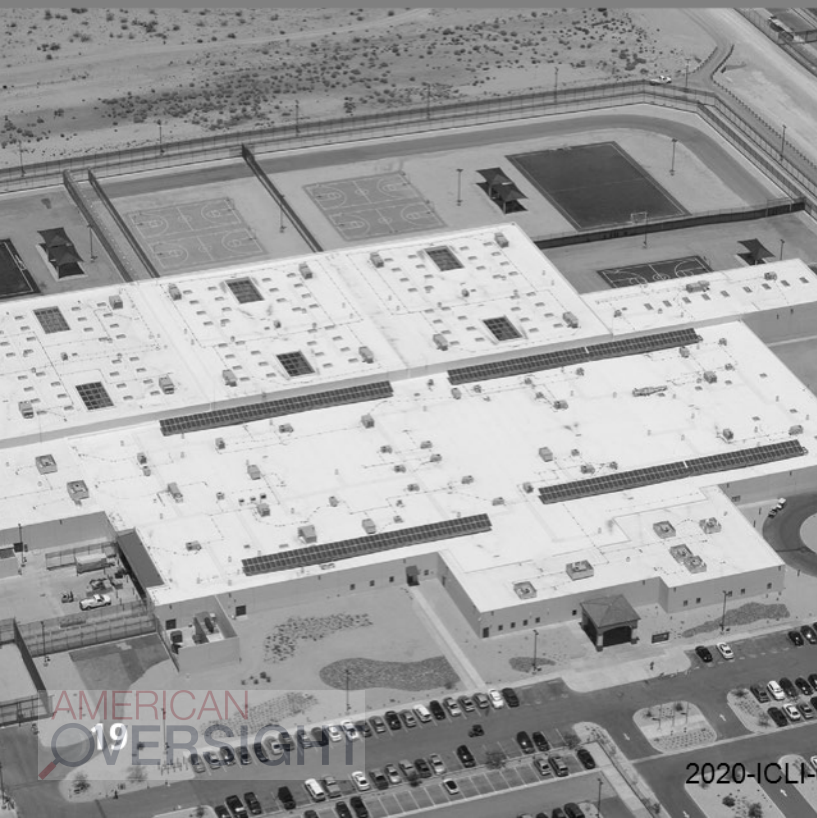


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Broward Transitional Center



Adelanto ICE Processing Center



LIFE SAFETY & PHYSICAL PLANT

GEO facilities are under the oversight of the GEO Design and Construction Division located at the Corporate Office. This Division has one dozen subject matter experts in facility design, project management, maintenance and repair, and physical plant operations. The division is led by a Senior Vice President with three decades of facility development and maintenance experience. The Division undertakes all new facility development and oversees physical plant maintenance and repair for GEO's 133 facilities.

Our facilities are maintained to be compliant with life-safety codes, fire protection standards and regulations developed by the National Fire Protections Association (NFPA), Occupational Safety and Health Administration (OSHA), and American Correctional Association (ACA).

Physical plant inspections are conducted on a scheduled basis and are comprehensive to ensure the integrity of the facility and the safety of all individuals in our care and our valued employees.

Each facility:

- employs a trained Fire/Safety Manager responsible for life safety, physical safety, environmental governance and compliance with OSHA, EPA, ACA, and customer requirements;
- undergoes a hazard assessment every three years conducted by professional engineers to review the soundness of the physical plant, utilities systems, fire and natural disaster resistance; and
- undergoes a comprehensive life safety inspection conducted by the relevant State Fire Marshal's office at least annually.



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PREA (PRISON RAPE ELIMINATION ACT)

GEO has zero tolerance for all forms of sexual abuse and sexual harassment in our facilities and programs. It is our policy that sexual conduct between employees, volunteers, or contractors and the individuals in our care, regardless of consensual status, is strictly prohibited and subject to administrative and criminal disciplinary sanctions.

Since January 2013, facilities within each GEO division are expected to strictly follow and comply with Section 28 C.F.R. Part 115 of the Department of Justice's (DOJ) Prison Rape Elimination Act National Standards or 6 C.F.R. Part 115 of the U.S. Department of Homeland Security's (DHS) Standards to Prevent, Detect and Respond to Sexual Abuse and Assault in Confinement Facilities.

The PREA Program is supported in multiple ways, including corporate, customer and third-party oversight, training for and communication to all employees and individuals, and thorough investigation of all allegations. Dedicated PREA administrative staff at GEO's corporate, regional and facility levels are responsible for all aspects of the PREA Program compliance.

All GEO facilities subject to PREA standards must be audited at least once during a three-year audit cycle to be considered compliant with those standards, with at least one third of each facility type audited each year of the three-year audit cycle. Each facility seeking PREA compliance is responsible for retaining a third-party U.S. Department of Justice-Certified Auditor to conduct audits during the three-year compliance cycle.

PROTECTION FOR VULNERABLE INDIVIDUALS

GEO utilizes a classification plan to determine the needs and requirements for everyone in our care. The classification plan includes interviews, record reviews and other assessments to determine security levels, vulnerability status, medical requirements, appropriate housing and program assignments, and any special needs.

Special needs individuals may include those suffering from substance abuse, those who are emotionally disturbed or mentally/developmentally disabled, and those who pose a high risk or who are determined to require placement in protective custody.

Individuals are classified to the most appropriate level of security and programming both upon admission to the facility and upon any subsequent review of their status. Staff members involved with classification plans include professionals in the fields of medical and mental health care, programming and counseling, religious services, dietary and nutrition, and security.

In instances where our government contracts require males and females to be housed at the same facility, GEO's policies ensure that individuals of different genders are housed in separate housing areas. These policies dictate strict physical and verbal separation and often no visual contact as well. All procedures are developed and executed consistent with our government customer policies and requirements. GEO's policies are also based on security considerations, the physical layout of the facility, and daily facility schedules including meals, recreation, medical care and general movement.

New Castle Correctional Facility
PREA Recertified in 2019



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**South Bay Correctional and Rehabilitation
Facility PREA Recertified in 2019**



**Desert View MCCF
PREA Recertified in 2019**



**RESTRICTIVE HOUSING UNIT (RHU)
POLICIES**

GEO has implemented policies to provide restrictive housing when necessary, typically limited to those circumstances which threaten the secure and orderly management of each facility. These policies are consistent with policies and standards set by our government customers.

Individuals posing a threat to others or a danger to themselves are, when necessary to ensure their safety, removed from the general population and placed temporarily in restrictive housing. Facility-specific written policies and procedures are in place governing the admission, operation, supervision and release of individuals in special management housing or restrictive housing including administrative status, protective custody and disciplinary restriction.

A written, individualized plan is created whenever a person is placed in restrictive housing and reviewed with the individual by locally designated professional staff. The plan is designed to return the individual to less restrictive conditions as promptly as possible. A multi-disciplinary staff committee at each facility reviews the progress of every individual against that person's individualized plan on a weekly basis at a minimum. The physical, behavioral, and mental health of each individual is assessed on a constant basis.

**SUPERVISION IN RESTRICTIVE
HOUSING UNITS (RHU)**

GEO staff provide regular supervision in Restrictive Housing Units in order to permit officers to hear and respond promptly to any emergency. All individuals in a Restrictive Housing Unit must be personally observed at least twice per hour.

GEO staff utilize the "PIPE Security System", which provides documentation for the frequency/observation of each cell by a security staff member, utilizing an electronic handheld scanner, or "PIPE", designed to record rounds in the Restrictive Housing Units.

During each round, staff touch the handheld PIPE device to the sensor button located adjacent to each cell door. Physical contact with the sensor button is required in order for the device to record the cell check. The PIPE device records these rounds and stores the information in the device. At least twice per shift, the information is downloaded from the device to create verifiable documentation of rounds. GEO policy requires that a manual log of all rounds in Restrictive Housing also be maintained.

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• ACCESS TO HEALTHCARE

The healthcare needs of the individuals in our care are often significant. Those needs can include acute or chronic healthcare conditions, and/or mental health issues, including despair, anxiety, depression, fear, thoughts of self-harm and suicidal ideation.

Healthcare staffing at GEO's ICE processing centers is approximately 117% more than that of GEO's state correctional facilities. The additional healthcare staffing is needed to provide appropriate treatment for detainees who have numerous health and mental health needs due to arriving from countries with limited healthcare services.

Although, GEO is typically responsible for the healthcare at our facilities as an ancillary component of our general management, we are sometimes not the direct provider of healthcare services. In some cases, our client determines who the healthcare provider will be.

According to statistics from the U.S. Department of Justice, the mortality rate in state correctional facilities averages 256 per 100,000 inmates. In the federal prison system, the average mortality rate is 225 per 100,000 inmates. By comparison, the mortality rate at ICE processing centers is significantly lower at less than three per 100,000 detainees.

GEO-provided healthcare services are under the oversight of the GEO Healthcare Division located in the Boca Raton, Fla. Corporate Offices. The Division is led by a Chief Medical Officer with four decades of experience in clinical medicine. He is supported by 12 subject matter experts in correctional healthcare, dental services, mental health services, quality control, administration, and off-site healthcare claims management, as well as clinical care support. The Corporate Healthcare Division monitors staff vacancies, clinical outcomes, special incidents, clinical encounters, outside patient care, medication management, and updates to clinical guidelines.

For all facilities at which GEO provides health services, local oversight and support for healthcare is provided through one of GEO's three Regional Offices, located in

Charlotte, North Carolina; San Antonio, Texas; and Los Angeles, California. Each Regional Office has a Regional Director of Correctional Health Services, and each Regional Director is supported by up to three Regional Managers of Correctional Health Services.

GEO strives to ensure that healthcare staff, including medical, nursing, dental, and mental health professionals, are available to provide care for everyone in our care. Through established staffing plans, these individuals fulfill their clinical and administrative responsibilities and work synergistically with our security staff to address any health situation that may arise. Our security staff are also trained to manage an urgent/emergent health situation when healthcare staff may not be immediately available, in accordance with GEO's policies and well-defined procedures.

Initial screening for medical, mental health and dental care is to be completed as soon as possible after intake, and generally within 12 hours of reception at our facilities. Those who are identified as most seriously ill are prioritized for immediate clinical evaluation.

Medical Exam Room at
GEO's Montgomery Processing Center



Our goal is for full healthcare exams to be conducted by a qualified physician, Nurse Practitioner, Physician Assistant or Registered Nurse within 14-calendar days following admission. Based on the results of the full medical examination, diagnostic and therapeutic plans, for any identified conditions, are developed clinically as indicated.

All individuals in our care have coordinated access to healthcare services. They are given the opportunity to submit oral or written healthcare requests at least daily. These requests are then picked up each day by healthcare staff and are reviewed and prioritized by qualified healthcare professionals.

All individuals in our care have the right to refuse or question the healthcare they are receiving through an established grievance process. This process is an important component of our Quality Improvement program.

Once a grievance has been submitted and reviewed, the issues raised are evaluated and immediate corrective action is taken if warranted. Face-to-face interviews are often recommended, so problems can be resolved effectively and promptly. The grievance process is carefully explained to all individuals in our care.

Suicide risk assessment and prevention is an important objective of GEO's healthcare services. Our suicide prevention program is clearly defined in policies and procedures and serves to minimize the occurrence of a suicide by reducing risk and self-destructive individual behaviors.

We take our responsibility to provide prompt and comprehensive health and mental health care to everyone in our care seriously as evidenced by the policies, practices and professional guidelines we follow in our facilities, including independent standards set by the American Correctional Association, the National Commission on Correctional Health Care, and the Joint Commission.

• ACCESS TO LEGAL SERVICES

Access to Leisure and Law Library

In accordance with standards promulgated by our company and our government customers, as well as, the American Correctional Association, we facilitate opportunities for those under our care to access leisure and law library services.

Our facilities are equipped with comprehensive leisure and law library resources, including computers or kiosks containing LexisNexis, a legal software application that enables powerful document and keyword searches to facilitate efficiency and confidentiality. Our libraries generally operate seven days a week, and include additional scheduling during evenings and weekends, which extends library access.

Our libraries are staffed with qualified personnel who provide technical support and manage ordinary maintenance associated with library needs, including LexisNexis software updates, notary services, inter-library loan programs, and replenishing library supplies.

Legal Library Computer Stations at
Broward Transitional Center



Access to Telephones

GEO ensures every individual in our care is afforded access to telephones, both immediately upon arrival and thereafter following their processing and housing assignment. The contracted telephone carriers are generally arranged by our government partners, who negotiate the rates for use of the phone services. Where standardized telephone carriers are not established by our government partners, GEO will enter into similar agreements with contracted telephone carriers.

Our housing areas are equipped with banks of telephones, most of which have attached privacy panels or full privacy enclosures. We provide access to telephones during operational hours and ensure private rooms are available for those who request unmonitored legal calls in a confidential setting. We prominently display contact numbers for a variety of entities, including our government customers, consulates (free of charge), legal advocates, legal rights groups, legal support services, PREA assistance and a 24/7 hotline.

Phone Banks at GEO's Broward Transitional Center



Access to Attorney Visits

All individuals under our care have access to attorneys through a variety of opportunities, including telephonic contact, onsite contact visits, onsite non-contact visits, onsite private visits in one of GEO's designated legal rooms or via marked legal mail. In order to protect attorney-client privilege and the confidentiality of legal material, incoming legal mail is handled as "time sensitive" and never opened and scanned by staff without the named addressee present; all outgoing legal mail is sealed by the sender and promptly placed in the mail for timely delivery.

In many jurisdictions, depending on rules established by our government customers, legal representatives are not required to be the assigned attorney of record to meet with any individuals in our care. With notice and when reasonably practical, GEO will also accommodate attorney requests to meet with their clients outside of normal hours.

Access to ICE Case Officers in ICE Processing Centers

U.S. Immigration and Customs Enforcement (ICE) Processing Centers are designed and built in strict adherence with ICE Building Standards, which generally include a substantial area for ICE onsite personnel responsible for contract oversight, as well as, ICE agents designated as case officers.

In addition to meeting face-to-face with individuals in our care on a scheduled basis, onsite ICE case officers have a secure mailbox within each housing area whereby any resident can submit a request to meet with his or her assigned ICE case officer outside the standing schedule.

In circumstances where an ICE Processing Center does not have an onsite case officer, regularly scheduled visits by offsite ICE case officers are conducted. In addition, a secure mailbox designated for ICE correspondence is available in all housing areas and is processed daily. Residents can also initiate a request to a GEO case manager or supervisory manager for assistance in contacting ICE case officers.

Facility Handbook

We have made it our goal to ensure all individuals in our care receive information regarding everything from intake to release, with an emphasis on how to access information requests, grievances, medical care, legal services, food services, education, telephone, visitation and recreation.

Human Rights & ESG Report

GEO provides every individual in our care a facility handbook. Our facility handbooks are intended to augment the orientation received upon arrival. These handbooks are printed in English and Spanish, with availability of translation services for those who speak a native language other than the printed material.

Access to Translation Services/Language Line

GEO facilities have a diverse workforce often with bilingual staff members. In our ICE Processing Centers, as well as for GEO's Secure Services' other clients, a language service line is provided which accommodates language barriers associated with both written and oral communication. These language lines are available at all times. They are commonly used when communication barriers cannot be overcome with staff translators, or when requested by our residents, or individuals representing them.

Access to Free Consulate Calls

GEO recognizes the importance of the ability of individuals in our care to communicate with consulate representatives. Our company provides free calls to consulate representatives, and a listing of consulate contacts is posted in the housing areas near the telephones. We promote this service during orientation and throughout each facility.

Established Grievance Procedure with at Least One Level of Appeal

GEO provides a grievance process grounded in accessibility, confidentiality, fairness, objectivity and integrity, without fear of retaliation. We provide access to grievance forms and generally make them available in the housing areas and libraries. A secure, locked box is available in the housing areas for placement of completed grievance forms.

Grievances are ordinarily collected daily, logged and processed to the appropriate department staff for review and timely response. The fidelity of our process lies in having an independent, second level appeal opportunity. GEO regional offices or representatives from our government customers, depending on jurisdiction rules, review the original grievance filed and the facility response and render a decision to approve or deny the grievance appeal.

• ACCESS TO FAMILY/FRIENDS COMMUNICATIONS

We recognize the importance of communication in the lives of all individuals in our care, and, subject to appropriate safety and security safeguards, we go to great lengths to ensure that they are able to communicate in a meaningful and timely way with their family members, friends, and legal representatives without undue time or privacy constraints.

Social support is critical in all our lives, and we strive to reduce barriers so that support systems remain intact for those in our care. All individuals have access to telephones, banking, visitation, mail services, writing materials, and access to volunteers and support organizations.

GEO provides a welcoming environment for all friends and family. Family and friends are accommodated throughout their visit. Snacks and drinks are available through fully stocked concession and vending machines. Family activities and games are also available in each facility's visitation area. Individuals who do not receive visitors are able to connect with family members through telephone calls and mail, and in some instances, through virtual visits via Wi-Fi tablets.

Telephones are available in each housing area so that individuals can maintain contact with family and friends who are not able to visit. Individual accounts are made available for family and friends to provide funding for canteen services, telephone service and other items. Access to writing materials and postage is also available to everyone in our care.

A variety of organizations and volunteers are also on site to provide support and connection at our facilities. Individuals may attend seminars, services and celebrations. Organizations and volunteers are a great resource for individuals who do not have family or friends nearby.

All individuals have access to telephones, banking, visitation, mail services, writing materials, and access to volunteers and support organizations.

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Human Rights & ESG Report

• ACCESS TO RELIGIOUS OPPORTUNITIES

We respect the right of everyone in our care to practice and follow the teachings of their faith preferences. Our diligence in the application of best-practices ensures opportunities for individuals to practice, assemble, choose religious dietary options, and have access to religion-specific credentialed clergy and spiritual advisors.

Within GEO facilities at any given time, there are approximately 40 different faith preferences, including but not limited to Judaism, Christianity, Islam, Hinduism, Buddhism, Sikhism, etc., as well as, other faith groups such as Wicca, Santeria, and Odinism.

All Chaplains at GEO facilities are professionally accredited and recognized by an ecclesiastical authority of their faith, but out of necessity remain faith-neutral in the facilitation of this wide variety of services. This ensures every individual in our care feels the freedom to exercise his/her faith without fear of discrimination.

To promote a sense of acceptance and safety within the spaces utilized for religious worship, pictures, icons and other religious paraphernalia unique to any one religion are removed or covered after each service. All the spaces in our facilities that are used for religious worship and instruction are multi-purpose rooms or stand-alone buildings.

The practice of any belief system may include a certain amount of educational, doctrinal, devotional, and practical instruction. For this reason, our chaplaincy staff makes faith-specific resources available in print, DVD, CD and video when available.

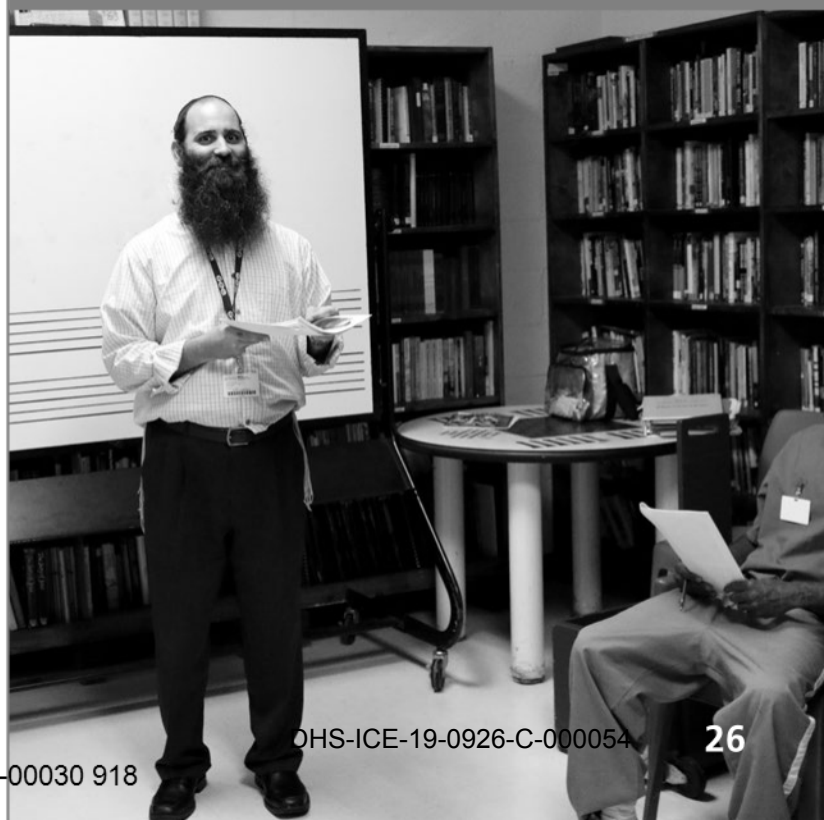
Individuals in our care are encouraged to contact religious organizations directly to request materials on a personal basis. In addition, specific alternate diets are readily accessible to satisfy a religious dietary requirement. Individuals can request alternate diets through each facility chaplaincy program.

Our Chaplains recruit, train, approve, and encourage volunteers locally to teach religious educational classes, facilitate faith-neutral and faith-based life skills programming, lead religious services, mentor, and act as informal spiritual advisors. We have engaged the time, talent and commitment of over 2,500 faith-based volunteers nationwide.

Chapel at GEO's Western Region Detention Facility



Faith Based Services at GEO's South Bay
Correctional and Rehabilitation Facility



Human Rights & ESG Report

• ACCESS TO SAFE AND NUTRITIOUS MEALS

Achievement of Successful Health Department Inspections for Facility Kitchens

Facility cleanliness and sanitation is a continuous objective. GEO Food Service areas are systematically inspected by food service staff. All kitchens operated by GEO, or on behalf of GEO, are required to meet or exceed all local, state and federal guidelines pertaining to institutional food service operation (e.g., public health, OSHA). The food service areas in our facilities are frequently audited by regulatory agencies and our government customers.

Successful Annual Facility Drinking Water Inspections by Governmental Entities

Annually, water municipalities provide our facilities with Consumer Confidence Reports also known as annual drinking quality reports as required by the U.S. Environmental Protection Agency. These reports reflect the compliance of drinking and wastewater with all applicable regulations and standards.

Specifically, these reports provide information relating to where the water comes from, the list and levels of regulated contaminants, any potential side effects and a comparison against national standards. These evaluations ensure we are providing safe and clean water.

Facility Menus Approved by a Registered Dietitian

The nutritional needs of the individuals in our care are diverse due to differences in age, activity, physical condition, gender, religious preference and medical considerations. Meals, regardless of type, (i.e., regular, medical, holiday or religious meals), are provided at no cost to everyone in our care. All GEO facilities provide three nutritionally balanced meals daily with a minimum of 2,800 calories for males and 2,400 calories for females. The standard menu cycle for a GEO facility is 35 days. Menus at GEO facilities are certified by a Registered Dietitian (RD) and reviewed annually at a minimum thereafter.

Our menus also undergo a complete nutritional analysis to ensure they meet U.S. Recommended

Daily Allowances (RDA)/Dietary Reference Intake (DRI) guidelines at least yearly. These guidelines are set by the Food and Nutrition Board of the Institute of Medicine; National Academies.

Facility ServSafe Training Certifications for All Food Service Staff

GEO Food Service staff are trained in sanitation, proper food handling and storage by ServSafe, a food and beverage safety training and certificate program administered by the National Restaurant Association, in addition to any locally required certifications to ensure the safety of the meals provided. GEO Food Service Managers are required to obtain the dual Instructor/Proctor ServSafe certification.

GEO Food Service Managers and Production Managers also receive ServSafe Managers and Allergens certifications. All other GEO Food Service staff are required to have the ServSafe Food Handlers certification. Certifications must be obtained within 30 days of hire.

GEO Food Services Staff at Broward Transitional Center



Dining at Karnes County Residential Center



Human Rights & ESG Report

• ACCESS TO RECREATIONAL AMENITIES

We respect the right of everyone in our care to maintain good health through participation in suitable recreational activities. Recreational amenities and activities can serve not only to enhance physical and mental health, but also help to establish healthy interactions and social connections.

Our facilities provide individuals with a variety of indoor and outdoor recreation activities. Enhanced individual and group recreation and wellness plans supplement traditional forms of recreation and allow case managers the ability to conduct continuous assessments of recreational interests and needs.

We provide gender and age responsive outdoor and indoor activities that promote life balance and recognize cultural diversity. Indoor activities and tournaments are available daily. Hobby craft programs provide opportunities to pursue artistic interests. Outdoor recreation activities include soccer on artificial turf fields, softball, basketball, and flag football.

Housing units in our facilities are equipped with large, flat-screen televisions to provide entertainment. In addition, many of the television sets are equipped with individual tuner-capability through headsets. This technology enables several TV screens to be tuned to different channels simultaneously, thereby allowing for choice in programming that can be watched without distracting others in the same housing unit or day room.

Outdoor recreation activities include soccer on artificial turf fields, softball, basketball, and flag football.



Billiards at GEO's Broward Transitional Center



Music Room at GEO's Big Spring Correctional Center



Sand Volleyball at GEO's Broward Transitional Center

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Human Rights & ESG Report

• ACCESS TO REHABILITATION PROGRAMS FOR STATE INMATES

GEO is a world leader in the provision of enhanced offender rehabilitation programs and post-release support services through the GEO Continuum of Care® (CoC).

Several years ago, GEO undertook an assessment of the company's client objectives, organizational resources, financial strengths, and reached the conclusion that we could do more for the people under our care.

We noted that we were organizationally and financially successful in providing secure residential care in GEO secure facilities for over a quarter of a million individuals annually. We decided there was more that we could do, and should do. Out of this self-assessment came the GEO Continuum of Care® (CoC) enhanced offender rehabilitation program.

What started as an innovative concept a few years ago was implemented at 18 GEO facilities in the United States and Australia as of 2018.

During 2019, we are expanding the CoC Program to include 20 facilities, and will further expand it in 2020 to include 23 facilities, comprising all state correctional facilities under GEO's management.

For 2019, GEO has committed \$10 million in funding for the GEO Continuum of Care® (CoC) Program.

The CoC Division at the Boca Raton, Florida Corporate Headquarters involves approximately 50 subject matter experts in offender rehabilitation, education, cognitive behavioral treatment, substance abuse treatment, case manager training, program quality assurance, and post-release services.

Our GEO Continuum of Care® provides enhanced in-prison offender rehabilitation programs including evidence-based treatment, integrated with post-release support services. GEO aspires to be the world leader in offender rehabilitation. The goal of our in-custody programming is to facilitate a successful transition by our participants into a crime-free daily life in their communities.

Our evidence-based treatment for state inmates begins with individualized risks and needs assessments and offers several unique and enhanced programs, including:

- Enhanced academic programming with the use of SMARTBoard technology for interactive learning in every classroom.
- Enhanced vocational training through nationally certified programs focused on future job and career opportunities.
- Industry-leading Cognitive Behavioral and Substance Abuse treatment based on nationally recognized curricula.
- Post-release support services, which involve post-release case managers and 24-hour support to assist offenders with the most crucial needs upon their release back into the community, including housing, employment, and transportation assistance.



Graduation Ceremony at
Graceville Correctional & Rehabilitation Facility



Classroom at GEO's Big Spring Correctional Center

2018 GEO CONTINUUM OF CARE® (COC) HIGHLIGHTS

POPULATION

64,620	Total Eligible Population
31,049	Total Program Participants

PARTICIPATION

6,733,045	Total Programming Hours Completed
44,518	Total Programming Completions
32,419	Behavioral Program Completions
16,409	Individual Cognitive Behavioral Treatment Sessions Completed
32,283	Average Daily Vocational Attendance
13,104	Average Daily Academics Attendance
17,965	Average Daily Substance Abuse Attendance
8,842	Total Substance Abuse Completions
9,131	Total Vocational Completions
2,779	Total High School Equivalencies Issued
216.8	Average Program Participation Hours per Participant

POST-RELEASE SUPPORT SERVICES SUMMARY

1,864	Total Post-Release Participants
631	Community-Based Participants
749	Participants Pending Release
900	Employed/Students

STAFF DEVELOPMENT

334	Total Annual Trainings
80,170	Total Staff Training Hours

Human Rights & ESG Report

GEO is very supportive of the First Step Act of 2018 which recently became federal law. The legislation's efforts to implement recidivism reduction strategies are fully aligned with our mission to provide enhanced, evidence-based rehabilitation programs, integrated with post-release support services, which help the men and women in our care successfully reintegrate into their communities.

GEO is at the forefront of developing partnerships with government agencies across the United States and overseas to develop innovative and effective rehabilitation programs. The GEO CoC model integrates enhanced in-custody rehabilitation programs including cognitive behavioral treatment, with post-release support services to address the basic needs of released individuals, including transitional housing, clothing, food, transportation, and job placement assistance.

In recognition of the results it has achieved and its industry-leading practices, GEO received the American Correctional Association (ACA) 2018 "Innovation in Corrections" Award for the Graceville Correctional and Rehabilitation Facility in Florida. To date, the CoC Program at Graceville has reduced "returns to prison" in excess of 30% when compared to a similar time frame prior to the implementation of these enhanced programming efforts.

Every day, more than 30,000 men and women in our facilities participate in evidence-based, in-custody rehabilitation programs ranging from academic and vocational classes to life skills and treatment programs.

Additionally, through our network of community reentry facilities in the United States, over 15,000 individuals on a daily basis participate in programs aimed at helping them successfully reintegrate into their communities.

These industry-leading efforts underscore our continued belief, that as a company, we are most effective, when those we care for, re-enter society as productive and employable citizens.

PROGRAMMING OPPORTUNITIES AT GEO ICE PROCESSING CENTERS

Although the CoC Rehabilitation Programs are not applicable to ICE Processing Centers, GEO does offer programming opportunities at these locations to reduce idleness and teach life skills to the residents. The programming opportunities include:

- voluntary work programs with work skills and safety training,
- faith-based programs,
- hobby crafts, and
- correspondence programs.

Barber Shop at GEO's Broward Transitional Center



III. GEO CONTRACT COMPLIANCE PROGRAM, GEO REMEDIES TO SHORTCOMINGS IN HUMAN RIGHTS PERFORMANCE, AND INDEPENDENT VERIFICATION OF GEO PERFORMANCE BY THIRD PARTY ORGANIZATIONS

GEO CONTRACT COMPLIANCE PROGRAM

GEO has an independent Corporate Contract Compliance Division that provides the overall direction and oversight of compliance for the entire company's operations and reports directly to the Chief Executive Officer (CEO). As detailed below, the Contract Compliance Division performs audits of GEO facilities, and the key components of GEO's commitment to human rights.

The GEO Contract Compliance Division is located in the Boca Raton, Florida Corporate Offices. It is led by an Executive Vice President with over 20 years of legal and law enforcement experience. He is supported by 41 subject matter experts in security, medical, American Correctional Association (ACA) accreditation, PREA, Joint Commission, National Commission on Correctional Health Care (NCCHC), Performance-Based National Detention Standards (PBNDS), Federal Performance-Based Detention Standards (FPBDS), and multiple agency standards. Contract Compliance personnel are located at the Corporate Office, each Regional Office, and on-site at all major facilities. The Contract Compliance Division provides ongoing compliance oversight with in-depth reviews and audits conducted monthly, quarterly, and annually.

The Division operates as an independent, headquarters-based monitoring team that is responsible for, and committed to, implementing the Quality Control Program throughout GEO's operational business units: GEO Secure Services and GEO Care. GEO's contract compliance and Quality Control Program is embedded throughout the entire operation with corporate, regional, and facility support staff having roles in oversight and reviews.

GEO has developed a comprehensive Quality Control Plan (QCP), that is reviewed and approved by U.S. Immigration and Customs Enforcement (ICE) for each contract location. These plans ensure operations follow 2011 Performance Based National Detention Standards (PBNDS), including the 2016 revisions, court orders, American Correctional Association (ACA) standards, National Commission on Correctional Health Care (NCCHC) standards, and specific customer and corporate policies.

GEO conducts audits to verify that ICE's detention standard requirements, including the 2016 revisions, and other contract criteria are consistently being met, and to identify opportunities to exceed these requirements.

We operate each of our facilities in compliance with governmental standards, national accreditation and certification guidelines, and the requirements of our government customers. Details of our Quality Control Program are posted on the GEO website at: www.geogroup.com/exceeding_quality_compliance

GEO's commitment to human rights and the effective implementation of its global human rights policy is reinforced by the firm's Quality Control Program, which includes systematic monitoring, facility audits, program reviews, and the development of corrective action plans.

The purpose of our Quality Control Program is to improve operational performance and compliance with our policies, customer contracts, and applicable standards. Implementation is the responsibility of our Contract Compliance Division, which is independent of all the company's other business areas.

INCLUSION OF HUMAN RIGHTS IN COMPLIANCE PROGRAM

The application of quality control measures to all aspects of our operations includes processes to identify human rights risks and implement related remediation. Notably, the Quality Control Program identifies audit requirements, audit processes, reporting requirements, training components, and guidelines for American Correctional Association (ACA) accreditation, Prison Rape Elimination Act (PREA) compliance and certification, and, for ICE facilities, Performance Based National Detention Standards (PBNDS).

Each GEO facility undergoes numerous audit reviews, including an annual GEO corporate audit, government customer audits, and third-party inspections.

GEO Secure Services – U.S. Audit Activity: 2016 - 2018

	2018	2017	2016
<i>Total Active U.S. Secure Facilities</i>	63	63	60
<i>Internal GEO Contract Compliance Audits Completed</i>	142	123	136
<i>Government Customer Audits Completed</i>	69	96	81
<i>Third-party Inspections Completed</i>	47	44	38

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GEO CONTRACT COMPLIANCE PROGRAM

GEO corporate audits cover a one-year period between the last and the current audit dates. Internal audits are conducted by facility staff on a pre-determined frequency. Follow-up audits - which are completed by our Contract Compliance department - focus on non-compliant findings and advised items from the prior year corporate audit, internal facility audits, and any customer concerns. Further, Contract Compliance conducts ad hoc audits when needed to address any concern identified in intervening customer audits, and/or internal audits.

During an audit, all non-compliant findings, observations, and impressions are captured and placed into GEO's compliance database. Audit teams are chaired by Contract Compliance directors or managers with team members selected by the audit chair and approved by the appropriate Contract Compliance director. Team members are Contract Compliance department staff and/or subject matter experts from our facilities and/or corporate office.

GEO Audit Category	Human Rights Related Questions
<i>Food Service</i>	7
<i>Physical Plant</i>	2
<i>PREA</i>	59
<i>Admission, Orientation</i>	1
<i>Law Library/Courts</i>	3
<i>Mail/Visitation/Telephone</i>	4
<i>Library</i>	1
<i>Discipline</i>	2
<i>Work Programs</i>	2
<i>Religious Programs</i>	8
<i>Substance Abuse Program</i>	2
<i>Sanitation</i>	8
<i>Safety</i>	2
<i>Emergency Preparedness</i>	1
<i>Accountability</i>	1
<i>Restricted Housing Units (RHU)</i>	7
<i>Searches/Security Inspections</i>	6
<i>Use of Force</i>	4
TOTAL	120

GEO's Contract Compliance audit tools are used to review every aspect of a facility's operations, including facility safety, staff training, and other key factors. Human rights related questions are answered in several categories during each facility's annual corporate audit. These questions currently make up 21 percent of the total number of questions posed during an annual corporate audit and include one or more questions in 18 separate categories.

A key element of our Quality Control Program involves training the quality assurance staff at each GEO facility on the Quality Control Program, audit practices and processes, the electronic database, ACA standards and accreditation, and PREA requirements and certification. This training is conducted on-site and remotely to update facility staff on new requirements and standards, address deficiencies, and respond to requests from facility staff.

GEO REMEDIES TO SHORTCOMINGS IN HUMAN RIGHTS PERFORMANCE

During an audit, all non-compliant findings, observations, and impressions are captured and placed into GEO's compliance database. A post-audit workshop is conducted at the conclusion of every annual corporate audit to ensure non-compliant findings are well understood and positioned for immediate corrective action. The workshop consists of meetings to focus on non-compliant items and to ensure the facility's leadership has a clear understanding of the audit results. Time-sensitive corrective action plans are drafted during the workshop to bring non-compliant items into compliance.

Benefits of the workshop include:

- Continuing the audit momentum to focus on the non-compliant findings and create "buy in" for grass-roots solutions that can be implemented quickly;
- the local compliance staff have the attention and support of facility leadership to focus other department heads to create corrective actions that address the "root cause" of the non-compliant findings;
- ownership on every level to address any findings, with the workshop creating a forum for discussion of complex or recurring issues;
- the facility receiving the benefit of Contract Compliance expertise, perspective, and sharing of best practices from other facilities.

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Human Rights & ESG Report

Corrective action plans are drafted with a focus on the problem, the details of the non-compliant results, an identification of remedial strategy, and a clear plan regarding how each area of non-compliance can be remedied. Each corrective action plan is assigned to a specific department at the facility to ensure accountability.

Following the audit, an executive summary, including auditor observations and impressions, as well as, the audit's findings are prepared by Contract Compliance staff and distributed to facility administrators, regional offices, and GEO Corporate leadership. Additionally, monthly department reports are compiled summarizing the previous month's activity and noteworthy occurrences, and these reports are distributed broadly to GEO senior leadership.

A critical element to GEO's quality control program is the follow-up audit. These audits are conducted to specifically review Non-Compliant and Advised Items from the last Annual Corporate Audit, internal facility audits and every non-compliant finding from client audits contained on the Contract Compliance Division's Client Concerns Log.

INDEPENDENT VERIFICATION OF GEO PERFORMANCE

Contracted facilities operate with significant levels of accountability and transparency.

Unlike government-run facilities, contracted facilities provide greater accountability because they are governed by detailed operating contracts and often have on-site, full-time government contract monitors who are employed to oversee the daily compliance of the contract requirements.

We recognize that oversight is an important part of the process that holds us accountable as a services provider, and verifies our efforts to protect the health, safety, and rights of persons entrusted to our care.

In addition to our comprehensive Contract Compliance quality control program auditing of human rights, all of our clients take an active role with oversight and auditing of our physical plants and service provisions.

States

State clients have monitors (in most cases onsite) assigned to each facility housing inmates, to oversee daily operations and quality of services delivered. Most states conduct

at least one comprehensive annual audit that may focus on all facets of a facility or specific disciplines.

U.S. Immigration and Customs Enforcement (ICE)

ICE Processing Centers have full-time, onsite contract compliance monitors. ICE also has a structured Quality Assurance Surveillance Plan that includes audits by ICE's Enforcement and Removal Operations and ICE OPR's Office of Detention Oversight. ICE uses subcontractors to perform an annual assessment using the Performance-Based National Detention Standards (PBNDS). Additionally, in many locations, ICE has stationed law enforcement and mission support personnel in office space that is adjacent to office space utilized by GEO staff.

The PBNDS reflect ICE's continuing efforts to create an environment for immigration detainees that reflects the unique purpose of immigration detention. The Performance-Based Standards were developed under the Obama-Biden Administration with the objective of improving the medical and mental health services, increasing access to legal services and religious opportunities, improving communication with detainees with limited English proficiency, improving the process for reporting and responding to complaints, and increasing recreation and visitation.

In 2016, ICE revised a number of the detention standards to ensure consistency with federal legal and regulatory requirements, as well as, prior ICE policies and policy statements. The detention standards located on ICE's website <https://www.ice.gov/detention-standards/2011> represent the updated version of the standards.



Contract Compliance staff at the
2019 ACA Conference
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U.S Department of Homeland Security (DHS)

DHS also conducts audits at detention facilities to review conditions of confinement and provisions for detainee rights. These audits are performed by representatives from the DHS Office of Civil Rights and Civil Liberties and the DHS Office of the Inspector General.

United States Marshals Service (USMS)

United States Marshals Service (USMS) conducts an annual Quality Assurance Review (QAR) at facilities with detainees under their jurisdiction. The QAR examines all aspects of services utilizing the Federal Performance-Based Detention Standards (FPBDS) to measure performance on an annual basis. USMS has assigned monitors to observe and review contract compliance.

The USMS modeled its Federal Performance-Based Detention Standards on the American Correctional Association Standards. The USMS Prisoner Operations Division and district offices use these standards to review non-federal facilities that house USMS detainees. The standards are designed to confirm that the facilities are “safe, humane, and protect detainees statutory and constitutional rights.”

Federal Bureau of Prisons (BOP)

Federal Bureau of Prisons (BOP) has full-time onsite monitors to oversee daily operations and contract service provisions. BOP conducts an annual Contract Facility Monitoring audit at each facility housing inmates under their jurisdiction as part of their Quality Assurance Program to assess contract performance. Compliance with BOP’s “Program Statements” is also a critical part of GEO’s auditing process. The BOP requirements are carefully detailed in its program statements and GEO works to meet each applicable standard.

OTHER AGENCIES AND ORGANIZATIONS

In addition to contract oversight by each client, our facilities are subject to audits by both federal agencies and independent, third-party organizations. GEO facilities are subject to oversight by the Department of Homeland Security (DHS), DHS Office of Civil Rights and Civil Liberties, and Department of Justice Office of Inspector General (DOJ-OIG). The DOJ-OIG conducts audits at facilities that house both USMS detainees and BOP inmates.

Additionally, GEO facilities have oversight from state and local organizations that review food service operations for safety and sanitation, fire safety, and emergency preparedness.

NATIONAL ORGANIZATIONS AND STANDARDS

GEO subscribes to operational standards promulgated by a number of certifying organizations and opens its facilities to inspection and accreditation by these associations, commissions, and councils. Accreditation serves as an additional level of quality assurance as well as providing an independent third-party professional assessment of operational performance.



U.S. Immigration
and Customs
Enforcement

ACA Accreditation

We have been an active participant of the American Correctional Association (ACA) since our company's founding. Through its independent accreditation process, ACA encourages best practices in the management and operation of correctional/rehabilitation facilities and processing facilities.

What are ACA's Standards?

Since their inception, the ACA standards have served to establish a fundamental operational structure for facilities and agencies that have implemented them. ACA standards interface with all aspects of operations, including safety, security, order, care, programs, justice, and administration, among others. While ACA standards provide guidelines for these areas and require the existence of some specific practices or conditions, they are designed to facilitate the development of

independent agency policy and procedure that govern the agency's everyday operations. Since the mid-2000s, ACA standards have gradually migrated to a "performance-based" model in which agencies collect, track, and analyze internal outcomes related to each standard in order to gauge their performance and adjust their operations accordingly. This model has proven to be a successful method of improving agency operations through the use of real-time data with an immediate and significant impact on inmates, staff, and administrators throughout the facility or agency.

ACA standards guide operations in every area of the facility or agency. Secure facilities such as jails and prisons must operate effectively as self-contained communities in which all necessary goods and services are provided in a safe, secure, and controlled manner. ACA standards relating to safety require adherence to all federal, state, and local fire and safety codes; emergency planning and preparation; and the provision of related training and materials for staff and inmates. Security standards mandate inspections and training of all firearms and armed officers; visitor and staff searches and tracking procedures; and inmate counting and tracking procedures. Other sections throughout each manual regulate policy, procedure, and practice at a similar level for other institutional or facility activities. (Source: ACA)

As a matter of policy, all GEO facilities are designed and operated in general accordance with the guidelines of one or more of the following organizations:

- American Correctional Association (ACA)
- Prison Rape Elimination Act (PREA)
- National Commission on Correctional Health Care (NCCHC)
- The Joint Commission (TJC)
- International Organization for Standardization (ISO)
- Australian Council of Health Care Standards (ACHS)
- Southern Association of Colleges and Schools (SACS)
- Correctional Education Association (CEA)
- U.S. Immigration and Customs Enforcement (ICE), Performance-Based National Detention Standards (PBNDS)
- United States Marshals Service (USMS), Federal Performance-Based Detention Standards (FPBDS)



We are committed to achieving ACA accreditation at all secure GEO facilities. This third-party accrediting body is intended to independently confirm that GEO's facility operations adhere to clear, recognized professional standards relevant to all design and operational areas of both residential and non-residential facilities, including safety, security, order, care, programs, justice, and administration. We facilitate the accreditation process by sending a Contract Compliance Director, ACA Director and Contract Compliance Manager to:

- assist facility staff in the preparation of preliminary documents for submission to ACA and provide training to executive staff and department heads;
- conduct a walkthrough to determine physical operational issues related to ACA standards;
- provide technical assistance in preparation of ACA files and ACA standard interpretation(s);
- send ACA Preparedness Survey to the facility four months prior to an ACA mock audit to collect information to assist the facility and for status checks on ACA file preparation and completion;
- conduct an ACA mock audit;
- be involved in the review and submission of the annual certification reports to ACA;
- attend the Facility's ACA audit; and
- organize panel hearing presentations and assist during hearings.

As a result of this preparation, 68 GEO facilities have achieved an average accreditation score of 99.6%. ACA scores for GEO facilities can be found on GEO's website at www.geogroup.com/Industry_leading_Standards

99.6% Average ACA Accreditation Score

PREA COMPLIANCE AND CERTIFICATION

GEO mandates zero tolerance towards all forms of sexual abuse and sexual harassment in our facilities and has developed a strong compliance process for facilities that fall within the scope of the Prison Rape Elimination Act of 2003 (PREA).

The majority of GEO facilities fall under either Section 28 C.F.R. Part 115 of the Department of Justice's (DOJ) Prison Rape Elimination Act National Standards or 6 C.F.R. Part 115 of the U.S. Department of Homeland Security's (DHS) Standards to Prevent, Detect and Respond to Sexual Abuse and Assault in Confinement Facilities.

GEO's PREA policy is available for public inspection on the company's website at: <http://www.geogroup.com/PREA>.

GEO has a dedicated PREA Coordinator, Director of Contract Compliance, reporting through the Corporate Contract Compliance Division. This Director oversees the implementation of PREA monitoring systems and policies for GEO facilities. GEO's PREA Director and individual Contract Compliance Managers:

- develop policies and procedures relating to and implementing PREA standards and compliant investigative practices;
- provide resources and guidance on PREA issues;
- coordinate and direct the certification process, including facility preparation and pre-audit preparation file review;
- review investigative files and practices;
- collect data and prepare reports as required;
- develop PREA-specific audit tool questions for internal and annual auditing;
- prepare each facility for certification review; and
- assist in investigations of PREA incidents and conduct mock audits.

Currently, GEO has 108 facilities certified under either the Department of Justice's or Department of Homeland Security's PREA regulations.

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National Commission on Correctional Health Care (NCCHC) Accreditation

The NCCHC is a national, non-profit organization originally established by the American Medical Association to develop and promote national standards of healthcare in correctional and detention settings. Although GEO facilities comply with ACA healthcare standards, many GEO facilities also obtain NCCHC accreditation at the request of the client. The NCCHC conducts audits of detention and correctional facilities every three years.

Currently, GEO has 15 secure facilities accredited by the NCCHC, including 10 immigration processing centers for which GEO provides healthcare services.

The Joint Commission Accreditation

For those GEO facilities that house Federal inmates on behalf of the Bureau of Prisons (BOP), GEO obtains healthcare accreditation under The Joint Commission. An independent, not-for-profit organization, The Joint Commission accredits and certifies nearly 21,000 health care organizations and programs in the United States. This organization offers accreditation to a variety of organizations including hospitals, medical practices, out-patient surgery centers, residential facilities, and behavioral treatment facilities. The Joint Commission conducts audits of detention and correctional facilities every three years.

All of our GEO BOP facilities are accredited by The Joint Commission.



LaSalle ICE Processing Center Dental Services



Moshannon Valley Correctional Center Optometry



**CREATING
OPPORTUNITIES:
DEVELOPING
OUR PEOPLE**



**Continuum of Care
Conference**



GEO is an equal opportunity employer focused on the rich diversity of our workforce with zero tolerance for all forms of workplace discrimination and sexual harassment.

Today, women comprise an equal portion of GEO's U.S. workforce and play a significant role in our leadership and management. **Of GEO's 18,427 U.S. employees, 50% are female.** Women account for 58% of our corporate employees, 41% of our U.S. security staff, and 31% of those serving in management positions as directors or above. GEO continues to recruit women to our workforce, with women comprising 53% of new hires in 2018.

Women are also involved at the highest levels of our organization. Of the seven members on GEO's Board of Directors in 2019, two are women. In 2018, the organization 2020 Women on Boards recognized GEO as a Winning Company for its commitment to board diversity. Winning Companies champion board diversity by having 20% or more of their board seats held by women. This marks the fourth consecutive year in which GEO has been recognized by 2020 Women on Boards, whose goal is to increase the percentage of women on all corporate boards to 20 percent by 2020.

In all areas of our business, GEO has strived to achieve wider racial and ethnic diversity. In 2018, two of our board seats were held by members of minority communities. Across our organization, under-represented minorities of the United States of America -- including African Americans, Hispanic and Latino, Asian, Pacific Islander, Native Hawaiian and Native American/Alaskan -- currently account for 60% of our total U.S. employees.

Minorities comprise 38% of GEO's corporate workforce in the U.S., 68% of our U.S. security staff, and 28% of those serving in management positions as directors or above.

GEO Group's employee population is also diverse in age. Of new hires in 2018, 37% were under age 30, nearly half (49%) were between ages 30 and 50, and 27% were age 50 and older.



50%

of GEO's
18,427 U.S.
Employees
are female.

Human Rights & ESG Report

EMPLOYEE DIVERSITY

U.S. Based Employees	2018	2017	2016
Total of all GEO's U.S. Employees	18,427	18,044	15,925
% of all U.S. Employees - Women	50%	49%	47%
% of all U.S. Employees - Minorities*	60%	60%	58%
% of Board of Directors - Women	33%	33%	33%
% of Board of Directors - Minorities	33%	33%	33%
% of Management Positions - Directors or Above - Women	31%	27%	24%
% of Management Positions - Directors or Above - Minorities	28%	28%	24%
% of Corporate Employees - Women	58%	57%	59%
% of Corporate Employees - Minorities	38%	38%	35%
% of All GEO Security Staff-U.S. (includes Transportation) - Women	41%	39%	40%
% of All GEO Security Staff-U.S. (includes Transportation) - Minorities	68%	66%	64%
% of all U.S. Employees - Veterans	10%	10%	12%

NEW HIRES

% of New Hires - Under Age of 30	37%	38%	37%
% of New Hires - Age 30-50	49%	48%	50%
% of New Hires - Over Age 50	27%	30%	17%
% of New Hires - Women	53%	52%	48%

*] Includes Hispanic/Latino, Black/African American, American Indian/Alaska Native, Native Hawaiian/Pacific Islander, Asian, and two or more races.

RECRUITING U.S. MILITARY VETERANS

We are honored by the fact that many veterans of U.S. military service have made careers at GEO and contributed significantly to the company's success.

Historically, we have focused part of our national recruitment strategy on hiring veterans and those currently serving in the U.S. military reserves. In each of the past five years, GEO has been recognized by U.S. Veterans Magazine among its "Top Veteran Friendly Companies." Nearly 1,900 U.S. military veterans currently work at GEO, accounting for 10 percent of the company's U.S. employees.

More information regarding GEO's hiring practices and commitment to workforce diversity can be found on our website at: www.geogroup.com/embracing_diversity_inclusion

COMPENSATION AND BENEFITS

GEO offers a comprehensive employee benefits program that is competitive in each of the geographic regions in which we operate across the United States.

The variety of our benefit offerings is designed to provide individual employees with the flexibility to choose coverage options and benefits that best meet their needs and address their priorities. Although there may be some regional variation in different options, such as type of healthcare coverage available, GEO's employee benefits generally include the following:

- Paid time off
- Dental
- Medical and Prescription Drug coverage
- Vision
- Short- and Long-term Disability
- Employee Assistance Program
- Tuition Reimbursement
- Voluntary Accident Insurance
- Legal and Identity Theft Protection Plans
- Paid Holidays
- Basic, Additional, Spousal and Dependent Life Insurance
- Health and Dependent Care Flexible Spending Accounts
- 401(k) Retirement Plan
- Voluntary Whole Life Insurance
- Voluntary Critical Illness Insurance
- Employee Rewards and Recognition Programs

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EMPLOYEE TRAINING AND DEVELOPMENT

GEO has a robust training program for staff at all levels of the organization. Our training of managerial, administrative, and security staff is based on American Correctional Association (ACA) standards. The training program consists of a minimum of 120 hours within the staff member's first year of employment and 40 hours of recurring training in each consecutive year of employment.

The program includes classroom, practical exercises, course examinations, and on-the-job training. GEO's corporate policy mandates that every new employee receive orientation training prior to undertaking any assignments.

Training topics include but are not limited to:

- GEO's Commitment to Respecting Human Rights
- Core Correctional Practices
- Social and Cultural Awareness
- Understanding the Individuals in our Care
- Workplace Violence Prevention Program
- Suicide Awareness and Intervention
- Interpersonal Communication Skills
- Prison Rape Elimination Act Training
- Staff Professionalism and Ethics
- Facility Grievance Procedures
- Health Insurance Portability and Accountability Act (HIPAA)
- Telephone, Mail and Visiting Procedures
- Religious Opportunities
- Accountability and Security Procedures
- Life, Safety and Emergency Procedures
- Use of Force Regulations and Procedures
- Emergency Planning and Response Procedures
- Facility Disciplinary Procedures
- Search Procedures
- CPR, AED and Basic First Aid
- Report Writing
- Personal Protective Equipment
- Giving Direction
- Contingency Management
- Universal Precautions

Contractor and Volunteer Training

GEO has developed a training format designed to introduce all contractors and volunteers to our facilities and programs. This is a self-paced course that must be completed prior to beginning their

services. The course includes GEO's Commitment to Human Rights, Facility Rules and Regulations, Inmate/Resident Rights and Responsibilities, and Entry and Exit Procedures.

Continuum of Care Training Institute

The GEO Continuum of Care® Training Institute trains all staff from the time of hire and regularly throughout their employment. Our staff development plans include basic training, refresher training, advanced training, skillset certifications, and new manager's training.

Staff also receive training on contract-specific requirements, communication and de-escalation skills, self-defense, group facilitation, and our internal proprietary case management system. In addition, we provide training on Evidenced Based Practices, Motivational Interviewing techniques, Trauma Informed Care, and training specific to the types of programs offered to participants.

COC TRAINING AND EDUCATION

	2018	2017	2016
<i>Total Staff Training Hours:</i>	80,170	46,750	43,350
<i>CoC Total Annual Trainings:</i>	334	153	140

Online Learning Management System

To provide our employees with the most up-to-date training materials, online courses, and training reporting, we use an internal, online Learning Management System. This system is available to employees 24/7 and includes self-guided courses and reference materials for various topics.



LABOR UNIONS AND COLLECTIVE BARGAINING

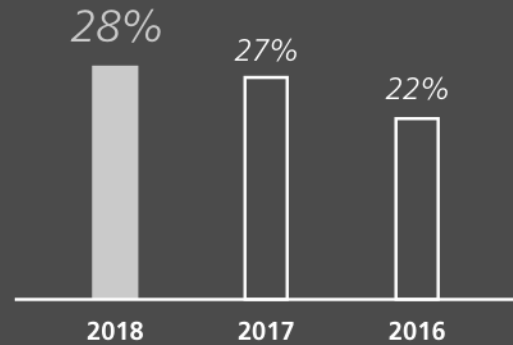
GEO welcomes the participation of labor unions in our facilities and respects the rights of individual employees to choose whether to join or not join labor organizations. In the U.S., employees in 41 of our facilities are represented by unions. At those locations, 5,267 GEO employees are represented by unions, which accounts for 69% of all employees at those locations. Across all of our U.S. operations, the unionized percentages are presented in the chart to the right.

We actively participate in the collective bargaining process, negotiate in good faith, and strive to maintain good working relationships with each of the unions representing our employees.

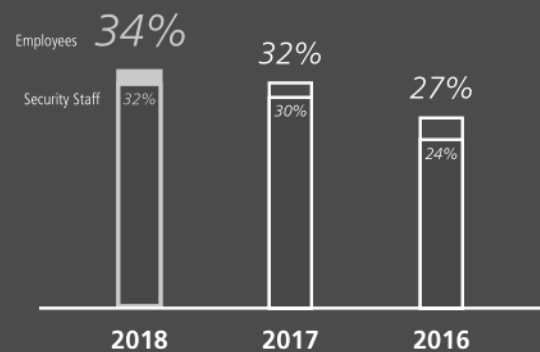
In the U.S., our employees participate in the following unions:

- International Association of Machinist & Aerospace Workers/National Federation of Federal Employees union (IAM/NFFE)
- United Government Security Officers of America (UGSOA)
- The International Union, Security, Police and Fire Professionals of America (SPFPA)
- International Association of Federal Employees
- International Brotherhood of Teamsters (IBT)
- Delaware County Prison Employees Independent Union (DCPEIU)
- National Union of Hospital and Health Care Employees, American Federation of State, County and Municipal Employees (NUHHCE/AFSCME) (1199J)
- American Federation of State, County and Municipal Employees (AFSCME in Illinois)
- Special and Superior Officers Benevolent Association (SSOBA)
- Communications Workers of America (CWA)
- Office and Professional Employees International Union (OPEIU)

UNIONIZED EMPLOYEES (2018-2016)



Total Number of all GEO Employees - U.S.



Total Number of GEO Secure Services Employees - U.S.

GEO welcomes the participation of labor unions in our facilities and respects the rights of individual employees to choose whether to join or not join labor organizations.



Human Rights & ESG Report

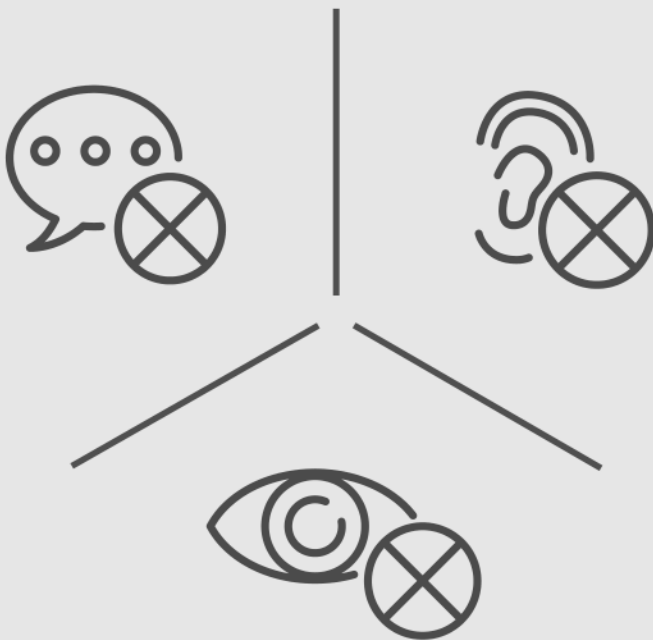
PROVIDING HIGHER EDUCATIONAL OPPORTUNITIES

GEO employees and their family members (parents, spouse and children) are eligible to further pursue their educational goals by receiving reduced tuition rates on a variety of accredited on-line degree programs in business, education, healthcare and other disciplines provided at 14 different higher educational institutions. Separately, GEO's subsidiary, BI Incorporated, offers an education assistance program to its full-time employees with at least one year of service.

We have a zero tolerance anti-discrimination and anti-sexual harassment policy



AMERICANS WITH DISABILITIES ACT (ADA) COMPLIANT



In 2018, more than 1,400 GEO employees in the U.S. utilized the FMLA.

COMPLIANCE WITH FEDERAL AND STATE EMPLOYMENT LAWS

In each of our operations throughout the U.S., GEO complies with all federal, state and local labor and employment laws and regulations. We have a zero tolerance anti-discrimination and anti-sexual harassment policy. This is covered as part of the training conducted with all our U.S. employees and includes instructions for multiple ways for individuals to report allegations.

We strictly enforce this policy, reinforce it in our employee communications, and maintain a process for promptly investigating allegations. We take action as appropriate, up to termination.

Throughout our organization, we recognize the needs of employees facing challenging life circumstances and respect their rights under the Federal Medical Leave Act (FMLA). In 2018, more than 1,400 GEO employees in the U.S. utilized the FMLA.

In addition, GEO engages in interactive processes to ensure that qualified individuals with disabilities under the Americans with Disabilities Act (ADA), as amended by the ADA Amendments Act, and all applicable state or local laws, are afforded reasonable accommodations for their disabilities.

GEO supports and complies with all applicable federal, state, and local laws and does not take any action against employees because they have exercised their rights under the law.

ENSURING SAFETY AND SECURITY



Throughout the United States, GEO oversees the operation and management of 127 secure facilities, processing centers, and community reentry facilities, as well as, 66 non-residential reentry programs. We currently employ 18,427 professionals in the U.S. and provide services to more than 250,000 individuals in our care on a daily basis.

The oversight of GEO's U.S. secure facilities is coordinated from three regional offices, located in Charlotte, North Carolina; San Antonio, Texas; and Los Angeles, California. Each regional office is headed by a Regional Vice President who oversees approximately two dozen experts in security, medical, finance, contract compliance, human resources, and other support services.

The oversight of our reentry centers, non-residential programs, community based case management, and electronic monitoring services is coordinated by several divisions within our GEO Care business unit: GEO Reentry Services, Abraxas Youth Services, and BI Incorporated.

GEO has a strong commitment to the health and safety of our employees and those in our care, as well as, contractors, medical providers and visitors at all of our facilities. Our responsibilities in these areas, along with those of our employees, are highlighted in section 7 of GEO's Code of Conduct.



Karnes County Residential Center

SECTION 7 - GEO'S CODE OF CONDUCT HEALTH AND SAFETY

GEO strives to provide each employee with a safe and healthy work environment. Each employee has responsibility for maintaining a safe and healthy workplace for all employees by following safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions.

Violence and threatening behavior are never permitted. Employees should report to work in the condition to perform their duties, free from the influence of illegal drugs or alcohol. The use of illegal drugs in the workplace will not be tolerated.



GEO is committed to the health and safety of our employees.

GEO'S EHS MANAGEMENT SYSTEM

Throughout our operations, GEO has implemented an Employee Health and Safety (EHS) Management System based on the concept of Integrated Safety Management.

As an established and recognized industry best practice, this comprehensive approach to safety encompasses core management functions, employee responsibility, engagement and communication between management and line staff, safe work methods, hazard analysis and controls, preventative and corrective measures based on investigations and root cause analysis, training programs, internal and external compliance audits and continuous improvement.

The overall management and direction of GEO's EHS program is led by GEO's Corporate Risk Management department, which includes professionals in occupational safety, workers compensation and casualty insurance, risk analytics, and environmental issues. Regional Safety Managers are embedded into our operations throughout the U.S. and provide hands-on support to individual facilities.

All facilities in the GEO Secure Services business unit employ a dedicated Fire & Safety Manager responsible for managing the EHS program locally. The Fire & Safety Managers are formally trained in multiple EHS disciplines, including the Occupational Safety and Health Administration (OSHA), National Fire Protection Association (NFPA) and Environmental Protection Agency (EPA), along with company and customer required practices.

In addition to organizational and management structure, the following are critical elements of GEO's ongoing EHS program:

Operational excellence: Our organization strives to achieve sustained, high levels of operational performance. This involves a focus on operations, decision-making, open communication, and systematic approaches to eliminate events or situations that may jeopardize the safety and health of employees or individuals in our care.

Individual responsibility for workplace safety: Every employee accepts the responsibility for safe operational performance and is trained to be

mindful of work conditions that may impact safety. Employees are encouraged to challenge assumptions, investigate anomalies, and consider potential adverse consequences of planned operational actions.

Compliance oversight: Competent, robust, periodic, and independent oversight is an essential source of feedback that verifies safety performance expectations are met and identifies EHS gaps and opportunities for improvement. Performance assurance activities verify whether regulatory standards and internal governance requirements are being met. Internal processes, procedures, and physical spaces are evaluated daily, weekly, and monthly for workplace hazards and proper sanitation.

Communication and staff engagement: Frequent, clear and open communication is an essential component of GEO's EHS program. There are multiple formal and informal channels for communication to and from staff regarding the discovery and mitigation of potential hazards and corrective actions that involve all aspects of workplace safety – all without any fear or expectation of retaliation. At the same time, individuals in our care are encouraged to be active participants in each facility's safety initiative by reporting any issues that may contribute to hazards or injury.



Safety committees are active at each facility.

Safety committees are active at each facility. These committees are supported by corporate-based committees and meet monthly to conduct reviews of safety activities, policies and procedures, and safety-related incidents for root-cause analysis and appropriate corrective action plans.

The safety committees play an integral role in assisting the Fire & Safety Managers and facility management teams, in reducing injuries and hazards associated with facility operations. Safety committee membership typically includes a balance of line staff and senior management to ensure the full representation of all aspects of facility operations.

Human Rights & ESG Report

ONGOING EMPLOYEE TRAINING HELPS DRIVE SAFE PRACTICES

As described in other sections of the ESG Report as well as on our website, GEO provides a robust training program for staff at all levels. Among the many areas that are covered, specific training modules are in place to reinforce the company's policy to respect Human Rights and facilitate workplace safety.

Our training of managerial, administrative, and security staff is based on standards set by the American Correctional Association (ACA). GEO's corporate policy mandates that every new employee receive orientation training prior to undertaking any assignments. On an annual basis, GEO's Training Director reviews and revises the Training Plan to better accommodate employee needs.

GEO's internal Continuum of Care Training Institute trains all staff from the time of hire and regularly throughout their employment. GEO's staff development plans include basic training, refresher training, advanced training, skill set certifications, and new manager's training. Staff also receive training on contract-specific requirements, communication and de-escalation skills, self-defense, group facilitation, and our proprietary Case Management System.

In addition, GEO provides training on Evidenced-Based Practices, Motivational Interviewing techniques, and training specific to the types of programs offered to participants in our care.



Training program covers a range of topics and disciplines



Graceville Correctional and Rehabilitation Facility

ON-LINE LEARNING MANAGEMENT SYSTEM:

To provide our employees with the most up-to-date training materials, on-line courses, and training reporting, GEO utilizes an internal, on-line Learning Management System. This system is available to employees on a 24/7 basis and includes self-guided courses and reference materials for various topics.

Training topics include:

- GEO's Commitment to Human Rights
- Work Place Violence Prevention
- Prison Rape Elimination Act (PREA) Training
- Suicide Awareness and Intervention
- Use of Force Regulations and Procedures
- CPR, AED and Basic First Aid
- Emergency Planning and Response Procedures
- Respiratory Protection
- Hazardous Energy Control
- Fire Protection/Prevention

MAKING AN IMPACT: ADDRESSING RECIDIVISM



The GEO Continuum of Care® division -- an innovative and award-winning initiative we piloted in two state correctional facilities in 2015 -- now provides enhanced in-custody rehabilitation programming, including cognitive behavioral treatment, integrated with post-release support services at 18 state correctional facilities and two federal facilities in the U.S. as of 2019. We are expanding the program to 23 facilities operated by GEO by the end of 2020.

In addition, GEO's Reentry Services division supports correctional agencies across the country with flexible options, such as in-custody treatment, residential reentry centers, and day reporting programs.

Throughout the U.S., individuals released from correctional facilities can continue their course of treatment at GEO's residential facilities or non-residential day reporting centers to maximize the impact of programs delivered to reduce recidivism. GEO's residential reentry resources include 48

facilities with more than 11,000 beds. GEO also operates 66 non-residential day reporting centers.

GEO's day reporting centers provide on-site cognitive-behavioral treatment and services tailored to participants' specific criminogenic risks and needs. At these centers, participants receive a continuation of their care, including intensive treatment focused on changing criminal thinking and behavior. At the same time, they are connected with community resources to enable them to become contributing members of the local community.

On a combined basis, the GEO Continuum of Care® division and GEO's Reentry Services division provide meaningful programming to more than 30,000 participants, including behavioral therapies, academic skills development and remedial education, vocational training and certification programs, cognitive-behavioral and substance abuse treatment, and faith-based support services.

GEO has published reports on the results of the GEO Continuum of Care® program for each of the past three years.

The 2018 GEO Continuum of Care® Annual Report can be accessed using this link:

www.geogroup.com/Portals/0/CoC_Annual_Report_2018.pdf

GEO's 2019 annual funding commitment in support of the CoC program is approximately \$10 million, representing approximately 7% of GEO's net income.



IN-CUSTODY REHABILITATION PROGRAMS: FACILITATING SUCCESSFUL TRANSITIONS BACK TO THE COMMUNITY

GEO's in-custody rehabilitation programs are tailored to the specific needs of each individual. They include:

- individual and group behavioral therapy activities,
- academic and remedial education,
- vocational skills training,
- substance abuse treatment, and
- a variety of faith-based services and support programs offered in conjunction with several partner religious organizations.

The GEO Continuum of Care® program demonstrates that individuals working with an assigned Transition Case Manager while in custody – within a year prior to their release – and then receiving assistance from a Post Release Case Manager, can achieve a reduction in recidivism.

For example, at the Graceville Correctional and Rehabilitation Facility in Florida, GEO implemented an intensive case management program to facilitate successful inmate transition to the community. Each individual within 12 months of release is matched with a highly-skilled case manager.

During bi-weekly, one-on-one cognitive behavioral treatment sessions, the pair work on lowering criminogenic needs and transition planning. Individuals are first assessed based on their risk index, or "Risk to Recidivate." Individual needs and goals are determined from the results of the assessment to develop their transition case plan.

EDUCATIONAL DEVELOPMENT AND ENRICHMENT



SMART Board Learning Classroom

At our GEO Continuum of Care® sites, individuals participate in an educational needs and opportunities assessment from which individual education plans are created based on learning style and needs. Progress is monitored continually and each plan is re-evaluated every 30 days.

To address the specialized and diverse educational needs of those in our care, GEO developed adult learning labs, which offer a combination of individual learning opportunities and technology-driven group interaction. Participants develop collaborative skills by working in teams at SMART Board stations to investigate, assess and respond to issues. Team members also build presentation skills.

GEO has also invested significantly in an extensive computer-based curriculum that meets individual learning styles. Academic subjects include math, science, social studies, language arts, and writing and computer skills. As part of the learning experience, core reasoning skills are integrated into each lesson.

Since 2014, our company has invested approximately \$1.6 million to equip more than 300 classrooms across our facilities with SMART Board Technology and added over 580 computer stations.

The adult learning labs help those in our care not only to strengthen academic skills, but also to work through anti-social criminal reasoning. As they work through the curriculum, participants begin to understand the importance of positive relationships and build on their achievements.

\$1.6M

invested to equip
more than 300
classrooms across
our facilities

GEO GROUP HIGH SCHOOL EQUIVALENCY DIPLOMAS AND VOCATIONAL CERTIFICATIONS: 2016 - 2018

	2018	2017	2016
GEO Continuum of Care Total Eligible Population	64,620	60,620	N/A
Total Program Participants	31,049	29,214	28,241
Total Programming Hours Completed	6,733,045	5,914,071	5,853,069
Total Programming Completions	44,518	30,814	24,274
Average Daily Vocational Attendance	32,283	24,291	24,330
Average Daily Academics Attendance	13,104	12,210	11,870
Total Vocational Completions	9,131	7,814	7,674
Total High School Equivalencies Issued	2,779	2,615	1,849
Average Program Participation Hours per Participant	216.8	202.5	207.25

Along with academic skills development, GEO provides a growing number of vocational training and certification programs. Many of these programs focus on high-growth industries or involve skill-sets that are in demand in communities where individuals will reside upon release. At present, the programs we offer encompass 16 different fields, including:

- Custodian Maintenance
- Barbering
- Horticulture
- Electrical
- Building Trades
- Auto Mechanics
- Upholstery
- Weaving
- Heating, Ventilation, and Air Conditioning (HVAC)
- Small Engine Repair
- Masonry
- Plumbing
- Culinary Arts
- Computer Repair
- Carpentry
- Welding

We're continually working to expand the vocational training and certification opportunities available to those in our care.

For example, GEO is in the process of collaborating with the International Association of Machinist & Aerospace Workers/National Federation of Federal Employees union (IAM/NFFE) to develop a pilot pre-apprenticeship program in Washington, D.C. to prepare individuals for Registered Apprenticeship programs.

FACILITATING TRANSITION: GEO'S POST-RELEASE SUPPORT SERVICES

Approximately 95 percent of all offenders return to their communities. GEO's Post-Release Support Services provide case management, develop and maintain community partnerships, and coordinate and distribute transitional resources based on individual need.

These measures are designed to reduce recidivism rates, as well as, to increase public safety, reduce victimization, and improve the quality of life for released individuals upon returning to their communities.

GEO's post-release support services include providing assistance for:

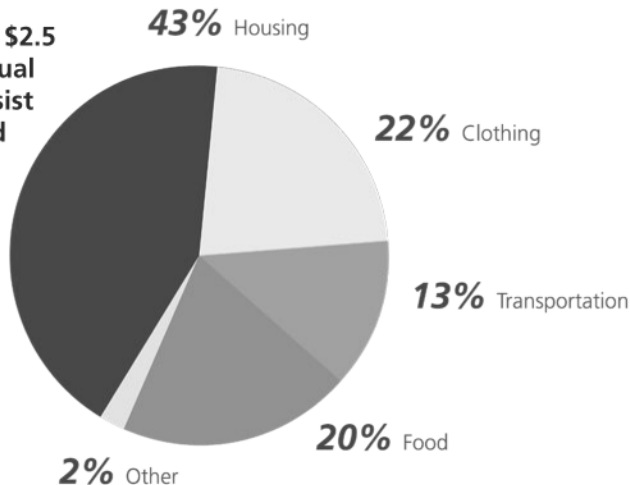
- Transitional housing
- Substance Abuse and Mental Health Treatment
- Vocational Training
- Transportation Assistance
- Family Reunification Opportunities
- Educational Classes
- Clothing and Food Vouchers
- Job Placement Assistance

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As an extension of the GEO Continuum of Care® initiative in six states, GEO's post-release case managers coordinate and facilitate the delivery of resources through 162 preferred providers. Weekly calls are scheduled with post-release participants to assess progress and provide support for up to 12 months, as well as, motivate participants to continue in the behavioral change process.

In addition to its extended case management, education, training and related services, GEO allocates \$2.5 million in annual funding to assist those released from custody in obtaining such necessities as: housing (43%); clothing (22%); transportation (13%); food (20%); other (2%).

GEO allocates \$2.5 million in annual funding to assist those released from custody



DRUG AND ALCOHOL TREATMENT

A critical element of GEO's services – both for individuals in our care and those involved in our post-release programs – involves the treatment of substance abuse, including alcoholism and opioid addiction.

Individuals with drug and alcohol addiction problems are provided with substance abuse treatment programs, including counseling, monitoring, and drug testing. The program is designed to introduce and educate participants with regards to the physical, mental and emotional dangers associated with drugs and alcohol and to provide a means for breaking the cycle of substance abuse and addiction.

GEO Continuum of Care: Substance Abuse Treatment	2018	2017	2016
Average Daily Substance Abuse Treatment Attendance	17,965	14,112	12,554
Total Substance Abuse Treatment Completions	8,842	8,412	8,220

Individuals may be referred to these programs based on their court commitment papers, by request of the individual, or based on an assessment by GEO's classification and counseling staff. These programs include either group or individual counseling and substance abuse education.

FAITH-BASED INITIATIVES

GEO currently partners with approximately 38 faith-based organizations around the country. National organizations and local community churches provide 2,500 volunteers to serve the individuals in our care and provide faith-specific doctrinal teaching, conduct worship services, teach faith-based life-skills classes, provide pastoral visitation opportunities, offer spiritual guidance, and conduct special holiday/holy day events.

On average, 21,300 of those in our care attend chapel services each month throughout our facilities. We are undertaking efforts to bring additional special event programming to our facilities in order to achieve higher attendance.

Eleven dedicated faith and character based housing units across our facilities provide at least one year of intensive faith-based and character-based programming. Classes in these faith and character based housing units include anger management, victim impact, life mapping, and goal setting, as well as, courses on parenting skills, accountability, and purpose.

38 faith-based organizations partner with GEO

Human Rights & ESG Report

In addition, GEO has partnered with the University of the South West (USW) and The Urban Ministry Institute, which provide accredited classes to qualified participants. USW provides a full baccalaureate degree, and The Urban Ministry Institute provides 30 credits transferrable to nine fully accredited colleges around the country.

To aid reentry, GEO's faith-based services enlisted the support of various transportation companies to provide Commercial Driver's License (CDL) certification; small business associations to make available entrepreneurial mentors and workshops; and other faith groups that harness the funds and manpower of larger churches to provide post-release support.

For example, GEO's partnership with the Global Leadership Network has provided 2,000 residents, 111 staff, and 22 volunteers in the past two years with the insight and knowledge of the most successful leaders in business, politics, and religion by participating in a two-day live broadcast event. The program started with two GEO facilities in 2016 and will expand to 14 GEO facilities by the end of 2019.

GEO CONTINUUM OF CARE® INTERNAL CERTIFICATION

Each GEO Continuum of Care® program undergoes an internal certification process that begins 90 days after its implementation. The process involves the use of GEO's Quality Assurance System to monitor the delivery of services and maintain and enhance fidelity and integrity.

GEO program supervisors conduct monthly and quarterly internal audits of groups, case notes, and case files. GEO conducts annual facility evaluations and contract compliance reviews. GEO also contracts with subject matter experts to conduct a comprehensive program checklist and a detailed measurement of program alignment with evidence-based principles.

The assessments extend to every aspect of GEO Continuum of Care® operations, performance, staff instruction, education and treatment methodologies, communication, and program outcomes.



Blackwater River Correctional and
Rehabilitation Facility Dog Program

*By the end of
2020, 23 GEO
managed facilities
will be Continuum
of Care sites.*

ENGAGING WITH OUR STAKEHOLDERS



GEO's commitment to respect the human rights of all persons in our care, as well as to sustainability and continuous improvement in our operations, is exemplified by our ongoing communication and engagement efforts with a wide variety of our stakeholders.

GEO stakeholders include our employees and board members, customers, regulators, accrediting organizations, faith-based groups and NGOs, individuals in our care, unions and labor organizations, communities where we operate, and investors, banks and financial institutions.

Through regular meetings and discussions, webcasts and conference calls, as well as the steady flow of information provided in our reports, newsletters, and posted on our

website, we strive to educate our stakeholders on our operations, governance practices, the regulatory environment in which we operate, and our overall commitment to corporate social responsibility, sustainability and respecting the human rights of all persons in our care.

At the same time, we have been active participants in ongoing dialogues with all of our stakeholders and consider their input and feedback critical to our focus on achieving operational excellence, having a positive impact on individuals and our society, and meeting the standards for excellence in corporate citizenship.

An area of emphasis by GEO involves working with key stakeholders to help the company understand different perspectives on human rights topics in secure facilities, processing centers and community reentry programs, and to learn how GEO can improve its operations to fulfill the commitments contained in our Global Human Rights Policy.



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FAITH-BASED ORGANIZATIONS

As part of our collaboration with key stakeholders, GEO partners with approximately 38 faith-based organizations around the country, including national organizations and local community churches. These organizations provide a wide range of worship, educational services and guidance to those in our care.

We have also partnered with the Global Leadership Summit, an annual two-day event telecast, which is held every August and reaches hundreds of locations in North America, engaging pioneering pastors and leaders from around the world who lecture about leadership, skill development and experiences that help local churches thrive.

We are proud of our partnership opportunities with faith-based groups in the communities where GEO operates facilities. We present a sampling of the comments of our partner organizations.



Catholic Charities, Diocese of Palm Beach Prison Ministry

"For many years the Office Prison Ministry in Catholic Charities, Diocese of Palm Beach, has been sending prison ministry volunteers to the South Bay Correctional Facilities to provide Catholic Christian Services...many people have benefitted from these weekly visits, including [GEO] officers who on occasion seek out the benefits of prayer as well.

"I attended the Appreciation Dinner at the South Bay facility...in 19 years of involvement in prison ministry, including 13 as director, no corrections facilities [have] ever come close to the reception that volunteers were offered that evening...thank you."

By Deacon Gregory C. Quinn, M.A.

Director of Prison Ministry



New Beginnings of Tampa

"I wanted to...thank you for our collaborative partnership with The GEO Group, and the great work being done through GEO's Continuum of Care. New Beginnings of Tampa has been providing transitional housing, rehabilitative services and job training/ placement for disadvantaged and vulnerable men and women for 20 years.

"We were given the opportunity to partner with The GEO Group in providing post-release support services as part of the Continuum of Care...the first thing we noticed was the passion and commitment of the GEO case managers...they go above and beyond when referring each client.

"We have never experienced this level of service and assistance when receiving referrals from traditional agencies in the criminal justice system...the clients from GEO arrive at our housing facility with a positive attitude and a focus on their goals."

By Thomas J. Safko

New Beginnings of Tampa, Inc., Tampa, Florida



God Behind Bars

"God Behind Bars is very blessed to be partnering with GEO Group...with GEO we have had the opportunity to co-labor inside several facilities to bring hope to several hundred inmates and their families through God Behind Bars' Weekly Experience, Small Groups, Pre-and Post-Release and Family Reconciliation programs.

"We are hoping that together we can reach hundreds more and have a working relationship that will last for several more years..."

By Raeanne Hance

Global Director of Corrections and Community Organizations

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THE GEO GROUP FOUNDATION

The GEO Group is committed to making a difference in the communities in which we operate. Every year, through our charitable arm, The GEO Group Foundation, GEO supports charities, schools, community organizations, and higher education scholarships for students across the country.

In 2018, GEO donated more than \$1.9 million to these initiatives, including more than \$700,000 in higher education scholarships, over \$444,000 for health and disabilities organizations, and \$175,000 to children's organizations in communities across the U.S.

COMMUNITY ENGAGEMENT

In addition to charitable giving, GEO's facilities play a unique active role in giving back to their community and their employees. We take great pride in the opportunities we make available to members of those communities, where we also engage those communities directly as a partner and a corporate citizen.

Our facilities hold quarterly Community Advisory Board meetings. Most of these boards include community leaders and key GEO facility staff. The meetings provide a forum for sharing information on current events at GEO facilities, as well as, to discuss the needs



of the communities, and to help expand the partnership opportunities between our facilities and local organizations.

An emphasis is also placed on increasing facility involvement in community affairs and services through employee volunteerism, fundraising, and participation in community events.

GEO FOUNDATION ANNUAL CHARITABLE GIVING (2016 – 2018)

	2018	2017	2016
<i>Higher Education Scholarships</i>	\$ 709,000	\$ 709,500	\$ 662,010
<i>Health & Disabilities Organizations</i>	444,620	579,375	481,680
<i>Children's Organizations</i>	175,002	311,146	200,680
<i>Local Schools & Education</i>	107,720	85,500	65,050
<i>Public Entities</i>	203,050	33,700	99,589
<i>Others</i>	267,250	523,985	365,133
<i>Total Donations</i>	\$1,906,642	\$2,243,706	\$1,874,140

COMMUNICATION OF HUMAN RIGHTS POLICY TO SUPPLIERS

GEO works with numerous vendors and suppliers of services and goods and recently began incorporating language requiring compliance with United Nations Guiding Principles on Human Rights in all of our contracts.

Through the years, we have strived to establish and build on relationships with numerous small disadvantaged, woman- and veteran-owned vendors across our U.S. operations. In 2018, the total value of our contracts with women-owned businesses exceeded \$36 million, while those with small disadvantaged businesses exceeded \$34 million. Our payments to veteran-owned business totaled more than \$11 million and our contracts with businesses owned by disabled veterans totaled over \$5 million.



SMALL AND DIVERSE VENDOR BREAKOUT:

Small and Diverse Vendor Breakout:	2018	2017	2016
<i>Woman Owned Business</i>	\$36,483,810	\$28,288,062	\$24,553,647
<i>Small Disadvantaged Business</i>	\$34,006,569	\$27,762,547	\$23,379,970
<i>Veteran Owned Business</i>	\$11,187,155	\$10,553,882	\$9,484,141
<i>Service Disabled Veteran Owned Business</i>	\$5,282,609	\$4,873,967	\$3,294,813

**DELIVERING ON
OUR PROMISE:
ETHICS AND
GOVERNANCE**



GEO's Corporate Code of Conduct and Ethics is built on a foundation of obeying the law, both in letter and spirit, and delineates the overarching principles that guide the organization and its employees in their day-to-day activities and interactions with key constituency groups.

Our Code of Conduct and Ethics strives to promote the following objectives:

- Honest and ethical conduct
- Ethical handling of actual or apparent conflicts of interest
- Full, fair, accurate, timely and understandable disclosure
- Compliance with applicable government and self-regulatory organization laws, rules and regulations
- Promote the protection of company assets
- Promote fair dealing practices
- Prompt internal reporting of Code violations
- Assuring accountability for compliance with the GEO Code of Conduct and Ethics

GEO's Code of Conduct and Ethics can be accessed on our website at:

https://www.geogroup.com/Portals/0/Code_of_Business_Conduct_and_Ethics.pdf

Specific sections of GEO's Code of Conduct and Ethics articulate the company's policies and guidelines with respect to compliance with anti-bribery and anti-corruption laws, government contracting, health and safety, conflicts of interest, accurate record-keeping, confidentiality, improper gifts, political contributions, anti-discrimination and anti-sexual harassment, reporting illegal and unethical behavior, as well as, senior leadership roles and responsibilities for meeting disclosure and accounting requirements set by the Securities and Exchange Commission.

ANTI-DISCRIMINATION AND ANTI-HARASSMENT

Section 6 of GEO's Code of Conduct and Ethics articulates the company's anti-discrimination and anti-sexual harassment policy:

"... We are firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment of any kind. Employment decisions must be based only on an employee's or applicant's qualifications, demonstrated skills and achievements without regard to race, color, sex, national origin, religion, age, disability, veteran status, citizenship, sexual orientation, gender identity or marital status.

Employees, officers, and directors must not engage in conduct that could be construed as sexual harassment. Unwelcome sexual advances, sexually suggestive statements or questions, offensive jokes, sexual innuendos, offensive touching or patting, requests for sexual favors, displaying or showing sexually suggestive material, and other verbal or physical conduct of a sexual nature may be forms of sexual harassment. You should report suspected instances of sexual harassment by anyone (including persons with whom GEO does business) immediately to your human resources contact."

Section 19 of GEO's Code of Business Conduct and Ethics establishes a "Special Code of Ethics for the CEO, Senior Financial Officers, and Other Employees."

This section also makes it incumbent on the part of any employee who identifies, learns of, or suspects a violation of proper and accurate disclosure to report this activity to GEO's General Counsel for investigation.

The standards and policies described in each section of GEO's Code of Conduct and Ethics are communicated widely throughout our organization and reinforced with each of our employees through rigorous and ongoing training.

At the time of hiring, all new GEO employees are provided a copy of GEO's Code of Conduct and Ethics, along with the GEO Employee Handbook, and are required to sign an acknowledgement form. Until 2018, all director level employees and above were also required to sign an acknowledgement form every year after their initial hiring. Starting in 2019, all GEO employees - including field, regional and corporate - will be required to read GEO's Code of Conduct and Ethics and sign an acknowledgement form annually.

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GEO'S BOARD OF DIRECTORS: INDEPENDENT, EXPERIENCED AND DIVERSE

GEO's Board of Directors is comprised predominantly of external directors. Of GEO's board members, only one, George C. Zoley, the company's Chairman, CEO and Founder, is an officer of the company.

The independent directors bring a wide range of complementary skills and experience that are relevant to our operations and give them the ability to provide valuable oversight and direction for our company. Specifically, our Board Members have extensive experience in law, government service, government contracting, finance, real estate, management, and international business.

GEO and its stakeholders and shareholders benefit in many ways from the deliberate diversity of our board: during 2018, two of the six directors were minorities and two were women.

BOARD OF DIRECTORS DIVERSITY

Board of Directors Diversity	2018	2017	2016
<i>Number of Board of Directors Members (As of Annual Shareholders Meeting)</i>	6	6	6
<i>Percentage of Underrepresented Minorities[*]</i>	33%	33%	33%
<i>Percentage of Women on the Board</i>	33%	33%	33%
<i>Percentage of Board Independence</i>	83%	83%	83%

[*] Includes Hispanic/Latino, Black/African American, American Indian/Alaska Native, Native Hawaiian/Pacific Islander, Asian, and two or more races.

Additional information on individual members of the GEO's Board of Directors is available on our company's website at: https://www.geogroup.com/board_of_directors

THE ROLE OF CONTRACT COMPLIANCE IN CORPORATE GOVERNANCE

GEO works extensively with various government agencies and entities, which exercise broad oversight of the operations, management, and daily activities at each of the facilities we manage on their behalf. Thus, compliance with the requirements set by these government entities is a critical component of GEO's overall governance, as well as, its ongoing success and sustainability.

Our Contract Compliance Division reports directly to our Chairman and CEO, and operates independently from all of our other business units and divisions. Among the department's responsibilities is the completion of annual audits of all of our operations and the oversight of any and all required corrective measures.

Further details on GEO's Contract Compliance division are provided in the ESG Report chapter titled: Meeting our Obligations: Oversight and Contract Compliance.

IMPORTANCE OF EMPLOYEE TRAINING

GEO employees undergo extensive training each year, including certifications associated with the performance of their individual job functions, as required by various federal, state, and local laws applicable to each jurisdiction in which we operate, and as stipulated under our company's government contracts.

In addition to instruction related to their individual job requirements and performance, all employees must participate in training regarding our company's policies related to human rights, anti-discrimination, anti-sexual harassment, ethics compliance, unethical or illegal activity reporting procedures, and anti-retaliation.

Additional information on employee training and development at GEO is provided in the ESG Report chapters, Our Commitment to Human Rights and Creating Opportunities: Developing our People, as well as on GEO's website at: https://www.geogroup.com/commitment_to_training_excellence

**MEETING OUR OBLIGATIONS:
OVERSIGHT
AND CONTRACT
COMPLIANCE**



As a service provider to various federal, state, and local government agencies for the past three decades, GEO is committed to providing professional services that meet or exceed the strict standards set by each of our government customers.

Along with satisfying governmental requirements, GEO employees also adhere to guidelines established by leading third-party accreditation agencies.

Each year, we devote substantial resources to assuring compliance with contractual requirements and that integrity and quality are maintained at all of our facilities. This is the direct responsibility of GEO's Contract Compliance Division.

The Contract Compliance Division was established to operate independently of each of our business units and divisions, reporting directly to the company's Chairman and Chief Executive Officer.

The Division uses an ongoing, formal process to review all operational aspects of GEO's U.S. operations. The process involves performing scheduled audits and related follow-ups for GEO Secure Services facilities and GEO Care's BI, Abraxas, and Reentry Services divisions. The process also involves extensive training of individuals with compliance and quality responsibilities at each of our facilities throughout the U.S.

GEO's Contract Compliance Division is managed by an Executive Vice President and is comprised of 41 additional highly skilled quality assurance staff who implement our Quality Control Program across our U.S. operations. They are engaged in systematic monitoring, facility audits and review of healthcare programs, and provide input with policy reviews and development of corrective action plans.

GEO utilizes many different audit tools, some of which have been provided by our government customers. Most of the audit tools

GEO employees adhere to guidelines established by leading third-party accreditation agencies



were developed directly by GEO's Contract Compliance team and are continually refined – to assess and assure compliance with the full range of standards and requirements set by our government customers, including:

- **At the Federal level:** the Federal Bureau of Prisons (BOP), U.S. Immigration and Customs Enforcement (ICE), and the U.S. Marshals Service (USMS).
- **State level:** State correctional agencies, such as individual state departments of corrections.
- **Municipal level:** Community corrections agencies and county jails.

The standards set by these governmental bodies typically apply to almost every aspect of the operation of our facilities, such as security and safety protocols, programs, food service and nutrition, living conditions, health care, recreation, religious services, work programs, mail, grievances, visitation, telephone access, and staff training.

As an example, ICE's "Performance-Based National Detention Standards 2011" (as revised in 2016) contain sections on safety, security, order, care, activities, justice, and administration and management, with specific instructions and protocols detailed in 44 sub-sections.

GEO's Quality Control Program is designed to improve operational performance and compliance with our established policies, government contracts, and recognized independent accreditation standards.

GEO Secure Services - U.S. Audit Activity: 2016-2018

	2018	2017	2016
<i>Total Active U.S. Secure Facilities</i>	63	63	60
<i>Internal GEO Contract Compliance Audits Completed</i>	142	123	136
<i>Government Customer Audits Completed</i>	69	96	81
<i>Third-party Inspections Completed</i>	47	44	38

GEO's Contract Compliance audit teams travel to each of our facilities across the country to conduct three to four-day annual reviews. The teams include up to eight subject matter experts who review all standards applicable to each specific facility or site.

In addition to the annual reviews conducted at all GEO facilities, the Contract Compliance team reviews and acts upon findings of separate government-conducted audits and ongoing monitoring activities.

GEO's Quality Control Program includes field and remote audits, the development and implementation of corrective action plans, accreditation preparation, and verification activity. Designed to prevent errors, identify gaps in operational excellence, and mitigate performance deficiencies, the program involves the following:

Two-part Compliance Process

Part one is an audit led by the Contract Compliance Division staff and field-based subject matter experts. The second part involves internal audits coordinated by each facility's dedicated compliance administrator or program director.

Consistent Content

Both types of audits include questions from GEO policies and procedures, contract requirements, applicable third-party accreditation standards, and government audit findings. The audits cover every issue GEO's government customers use in their own individual audit activities.

Analytics and Reporting

Both sets of audit results are entered in the Contract Compliance Division's database, analyzed and shared with all levels of GEO's management leadership to identify trends and potential for improvement opportunities.

Continuous Improvement

At year-end, all applicable Contract Compliance audit tools will have been evaluated for continued adherence with requirements. Audit results are used to develop effective corrective actions, where needed, as well as, to inform daily monitoring practices to ensure thorough and sustained compliance.

Specialized Health Care Assessments

A dedicated health care team within the Contract Compliance Division audits all aspects

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of health care treatment provided at GEO Secure Services and applicable Reentry facilities in the U.S. to assess the quality of each facility's health care program, identify improvement areas, and assist in developing effective corrective action plans as needed. The Contract Compliance health care team includes five compliance specialists, of which one is the Corporate Director and one is a Corporate Manager who are medical doctors with more than 50 years of combined experience.

COMPLIANCE TRAINING

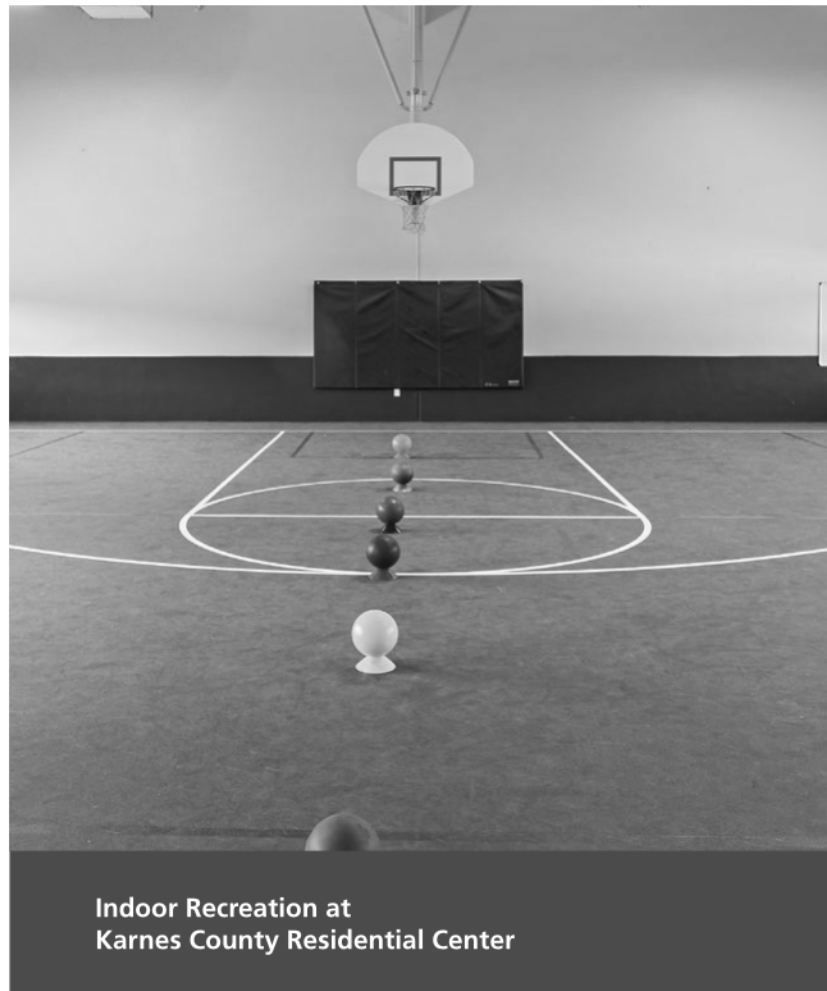
The GEO Contract Compliance department has a dedicated team responsible for the provision of training for new compliance staff at each facility across all GEO divisions. This team was established to provide a consistent message and level of training to all facility compliance staff. The training program includes topics such as quality control program procedures, auditing techniques, policy writing, and corrective action plan development.

Additionally, the Contract Compliance department makes training available annually to compliance staff via an electronic learning management system. Training topics vary from year to year and may include goal setting, policy writing, and effective time management.

GEO has consistently received a rating of "Exceeds Standard" during PREA certification audits for standard 115.31 "Employee Training." All employees receive initial and annual refresher training that includes, but is not limited to: GEO's zero-tolerance policy for sexual abuse and harassment; reporting requirements; communicating effectively and professionally with individuals in GEO facilities including LGBTI individuals; how to avoid inappropriate relationships with individuals in a GEO facility; and the detection and response to signs of threatened and actual sexual abuse.

MEETING STANDARDS AT U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE) PROCESSING CENTERS

GEO has been a long-standing service provider to the federal government and U.S. Immigration and Customs Enforcement (ICE) dating back to the



mid-1980s. All of GEO's ICE Processing Centers operate in accordance with ICE's Performance-Based National Detention Standards (inclusive of any applicable waivers), established under President Barack Obama's Administration. ICE employs several full-time, on-site contract monitors, who are permanently located at each of our facilities.

In addition, GEO generally provides permanent office space for hundreds of ICE personnel, immigration attorneys, immigration court judges, and other federal government officials.

All of GEO's ICE Processing Centers are audited and inspected by the agency on a routine and unannounced basis. Also, each facility is reviewed by independent accreditation entities, including the American Correctional Association (ACA) and the National Commission on Correctional Health Care (NCCHC).

U.S. THIRD-PARTY ACCREDITATION ENTITIES

In addition to complying with standards established by each of our government contracting agencies, GEO adheres to operational standards promulgated by several leading third-party accreditation organizations and opens its facilities to inspection and review by these associations, commissions, and councils.

As a matter of corporate policy, all GEO facilities are designed and operated in general accordance with the recommendations of one or more of the following organizations:

American Correctional Association (ACA)

The oldest association developed specifically for practitioners in the correctional profession, ACA has thousands of members in all parts of the world. Its rigorous accreditation process and standards promote ethics with the justice profession, address all aspects of correctional facility operations and management, and are based on valid, reliable research and exemplary correctional practice.

National Commission on Correctional Health Care (NCCHC)

Given its stated mission to improve the quality of health care in jails, prisons, and juvenile confinement facilities, NCCHC establishes standards for health services in correctional facilities, operates a voluntary accreditation program for institutions that meet those standards, produces and disseminates resource publications, conducts educational conferences, and offers a certification program for correctional health professionals.

The Joint Commission

An independent, not-for-profit organization, The Joint Commission accredits and certifies over 22,000 health care organizations and programs in the U.S. Joint Commission accreditation and certification is recognized nationwide as a symbol of quality that reflects an organization's commitment to meeting certain performance standards.



ACA Innovation in Corrections Award presented to GEO Continuum of Care® in 2018

Prison Rape Elimination Act (PREA)

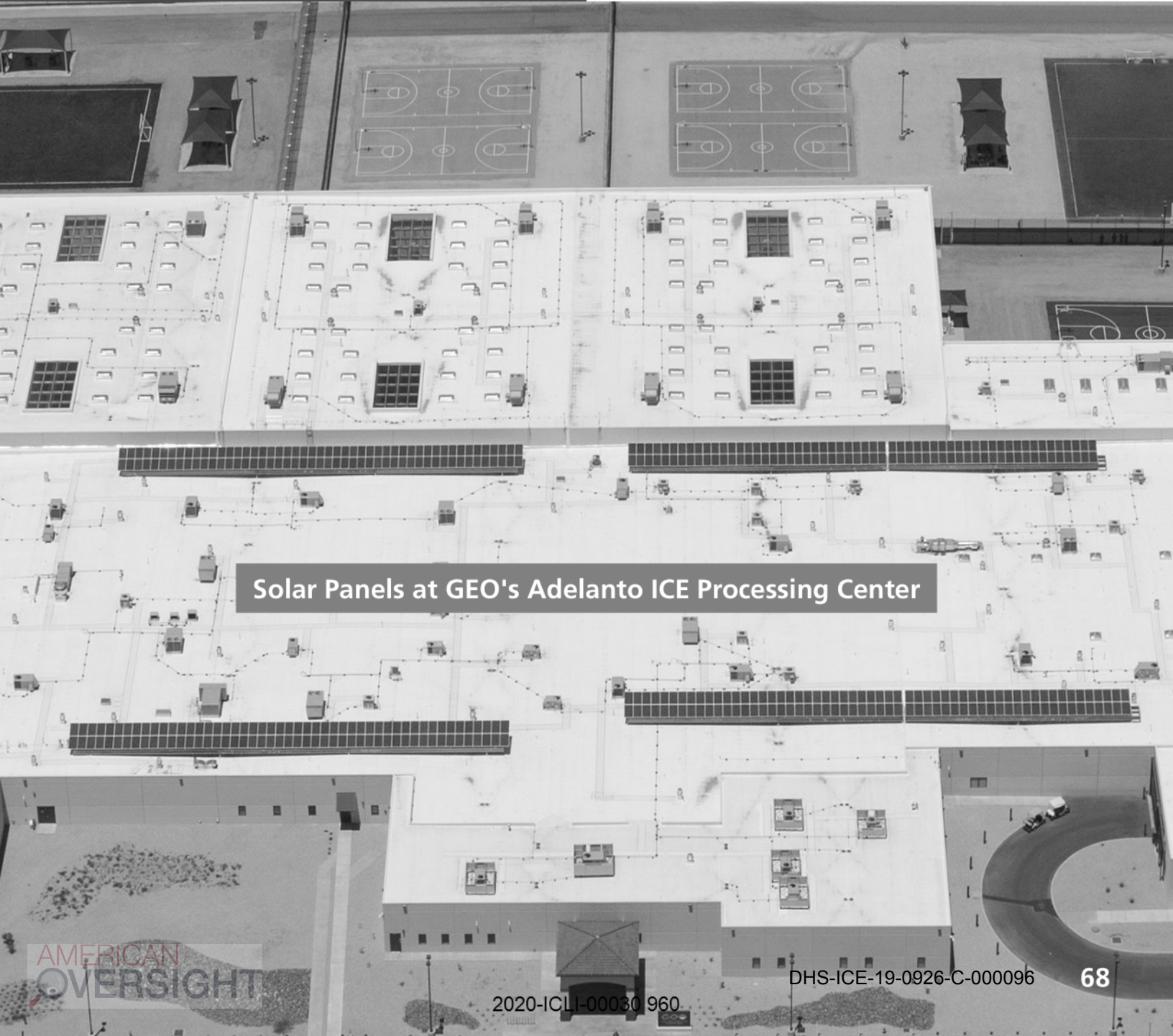
The Prison Rape Elimination Act (PREA) was passed in 2003 with unanimous support from both parties in the United States Congress. The purpose of the act was to “provide for the analysis of the incidence and effects of prison rape in Federal, State, and local institutions and to provide information, resources, recommendations and funding to protect individuals from prison rape.”

Following passage of PREA, the U.S. Department of Justice issued National Standards To Prevent, Detect, and Respond To Prison Rape (Final Rule, dated, June 2012)¹, and the U.S. Department of Homeland Security issued ‘Standards to Prevent, Detect and Respond to Sexual Abuse and Assault in Confinement Facilities’ (79 Fed. Reg. 13100, Subpart A dated March 7, 2014)².

¹ 28 C.F.R. Part 115 (2019)

² 6 C.F.R. Part 115 (2019)

ENERGY AND ENVIRONMENTAL SUSTAINABILITY



Solar Panels at GEO's Adelanto ICE Processing Center

GEO is committed to creating sustainable environments in the operation of our facilities throughout the U.S. and worldwide. For several years, we have been monitoring our facilities' utility operating costs on a monthly basis, including electricity, natural gas, water usage, waste disposal, and carbon emissions to encourage each facility to focus on conservation measures and enhance environmental sustainability efforts.

In 2017, we issued an internal utility sustainability report, ranking leading and trailing facilities throughout our company in terms of electricity, gas and water usage, and solid waste generation. The report also provided instructions and strategies to staff for reducing the consumption of energy and water resources, and addressing waste production. As individual GEO facilities adopt a green operational philosophy, the facilities are better able to manage energy consumption, reduce emissions, and lower operating costs.

In addition to the energy conservation activities at existing GEO facilities, at each of our newly-constructed facilities, we are implementing a wide range of green initiatives, including:

- Use of R30 insulation in roofing
- R20 insulation in walls
- White reflective roofing materials
- Building management systems
- Low-flow showerheads
- Use of recycled water in laundry operations
- High efficiency LED lighting
- Occupancy sensors in offices and classrooms for lighting
- Use of gas for hot water heating instead of electricity
- Cycling of air conditioners using the building management system to avoid utility peak load charges
- Skylights for natural light with light level sensors for balancing artificial lighting loads
- Low flow plumbing fixtures
- Control of plumbing fixtures, including showers, from control rooms
- Waterless urinals
- Use of timers/photocells on exterior lighting
- High efficiency HVAC equipment
- Use of chilled water systems vs. rooftop DX units
- Heat recovery for laundry exhaust
- Photovoltaic solar panels

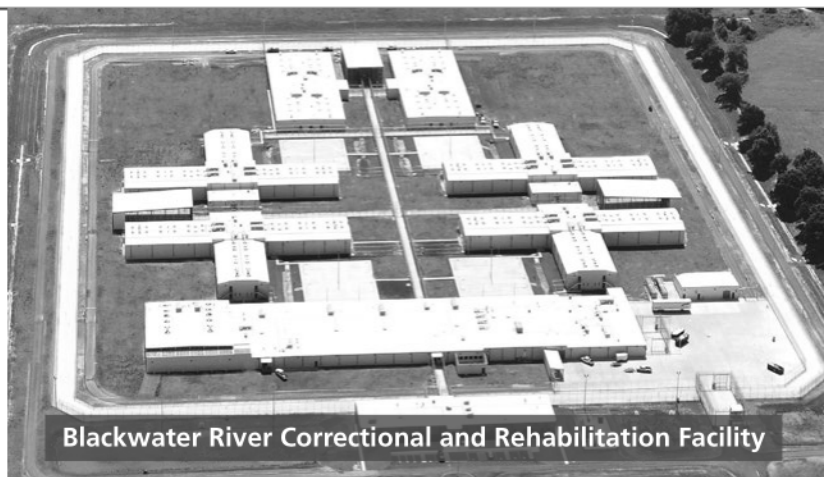
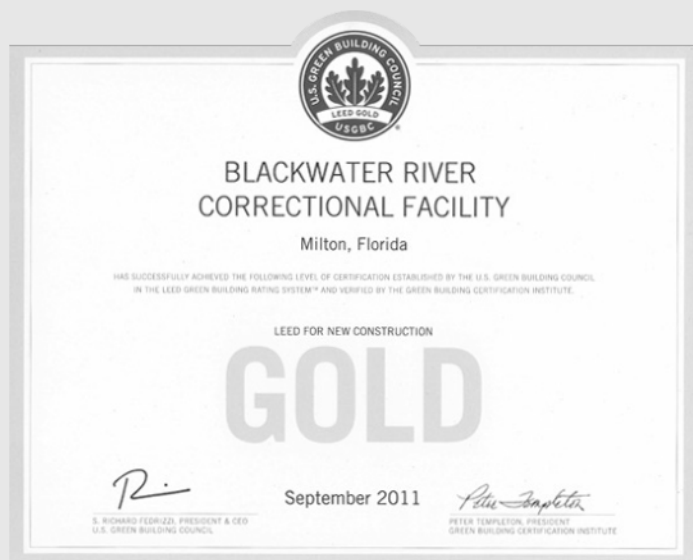


As individual GEO facilities adopt a green operational philosophy, the facilities are better able to manage energy consumption, reduce emissions, and lower operating costs.

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LEED CERTIFICATION

GEO is committed to sustainable building practices that incorporate energy efficiency and mitigate environmental impact in the development of new facilities. We are committed to sustainable operations as reflected in our focus on new design and construction in accordance with LEED standards administered by the Green Building Certification Institute.



Blackwater River Correctional and Rehabilitation Facility

The Green Building Certification Institute

The Leadership in Energy & Environmental Design (LEED) certification program is administered by the Green Building Certification Institute. LEED certification is based on an evaluation of a number of environmental factors including but not limited to the sustainability of the site, the efficient use of water, energy, material, and other resources, the quality of indoor air and overall environment, and the use of innovative and environmentally friendly technologies and strategies.

The Green Building Certification Institute determines that a completed project satisfies all prerequisites and has achieved the minimum number of points outlined in the LEED certification program for the rating system to achieve a particular level of LEED certification -- such as LEED Certified, LEED Silver, LEED Gold or LEED Platinum.

GEO's Blackwater River Correctional and Rehabilitation Facility Meets LEED Gold Standards

The facility received LEED Gold Certification in 2011 and has many environmental and energy-efficient features, including:

- Heat-reflective white roofing systems
- Low-flow water fixtures
- Laundry water consumption control system
- Sustainable energy utilization: 70% electrical demand from wind power through the grid
- Waste recycling program
- Chilled water air conditioning system for interior climate management
- Dayrooms with auto shut-off lighting when skylights provide sufficient natural light

Following GEO's Blackwater River Correctional and Rehabilitation Facility in Milton, Florida becoming the company's first Leadership in Energy & Environmental Design (LEED) Certified project to receive a Gold Certification in 2011, 14 new or expanded GEO facilities throughout the U.S. have been designed in accordance with LEED certification standards. They include three facilities, and GEO's new Corporate Headquarters, designed or built between 2016 and 2018.

Each new facility design takes into account all regulatory requirements, as well as, applicable energy-saving and safety features.

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CAREFUL, THOUGHTFUL PLANNING, NEW CONSTRUCTION APPROACHES HELP PROTECT GEO EMPLOYEES AND THOSE UNDER OUR CARE FROM IMPACT OF SERIOUS WEATHER EVENTS

In recent years a significant number of serious weather events have struck many parts of the U.S. As part of its risk management responsibilities, GEO conducts extensive, ongoing crisis and business preparation and continuity planning at all of its facilities. We also are focusing on building new facilities that are better able to withstand the impact of such events.

Protecting those in our care during a major hurricane.

In 2018, when Hurricane Michael inflicted substantial damage at the GEO-managed Bay Correctional and Rehabilitation Facility in Panama City, Florida, we were able to evacuate all 963 individuals under our care and transport them safely to other facilities until we were able to repair the facility.

Even though the roofing of every structure in the facility had to be replaced, along with much of the gymnasium, flooring and electrical system, those in our care were gradually able to begin returning to the facility within three months of the storm. Several weeks later, the facility was fully operational with a complete slate of educational program offerings.

New facility built to withstand serious weather events.

Completed in 2018, GEO's Montgomery Processing Center in Conroe, Texas was designed in accordance with Leadership in Energy and Environmental Design (LEED) Silver standards, a globally-recognized symbol of sustainability achievement. Comprised of highly efficient and cost-saving green buildings, the Center was designed to International Code Council (ICC) 500 standards as a Hurricane Shelter, was developed to be able to withstand a category 5 hurricane, and is expected to provide 100 percent auxiliary power in times of emergency.

Individuals in our care at the Montgomery Processing Center have access to enhanced recreational opportunities including artificial turf soccer fields, shaded pavilions, basketball courts, paved walk path, and handball courts, and the Center features extensive onsite administrative office, courtroom, and support spaces.

More information on the Montgomery Processing Center is available on our company website at: www.geogroup.com/GEO-World-Detail/WorldID/57

ENVIRONMENTAL INITIATIVES AT BI INCORPORATED (BI)

GEO's BI Incorporated division, which manufactures electronic monitoring devices, has initiated environmental measures to promote recycling and re-use of materials. The majority of equipment orders are shipped to the facility in plastic cases, which can be re-used four to five times longer than previous cardboard shipping containers. Packaging for supplier parts also contains recycled content, and BI has implemented a shipping carton return service.

In the U.S., BI also launched an environmental operation in its manufacturing facility to recycle, repair, and reuse plastic products. Other green initiatives at BI include the installation of energy-efficient lighting and the procurement of products free of Ozone Depleting Chemicals (ODCs), lead, and other harmful substances.

Additional details regarding GEO's energy-saving, conservation, and green building initiatives are available on our website at: www.geogroup.com/Sustainability

PROVIDING RESILIENCY FROM THE IMPACT OF NATURAL DISASTERS

In recent years, the large number of serious weather events occurring throughout the U.S. and the U.S. Geological Survey's recalibration of the country's seismic exposures led to changes in various building codes and safety requirements.

Accordingly, we have made design modifications to our facilities in affected areas to comply with new codes and contractual requirements to protect the safety of our employees, those in our care, government employees, contractors, and visitors.

For instance, the Montgomery Processing Center in Conroe, Texas was designed as one of the first facilities in the country to be ICC 500 compliant, which qualifies this facility to act as a hurricane shelter. Its finish floor elevation was set above the 500-year flood plain. It also has full facility double redundant emergency power back-up, which provides a minimum 72 hours of back-up power with service contracts for refueling.

In other flood-exposed areas across the U.S., GEO strives to acquire sites that are protected from floodwater intrusion. All designs have the facilities' finish floor elevations set at least above the 100-year flood plain.

FINANCIAL MANAGEMENT AND PERFORMANCE



The GEO Group, Inc. (NYSE: GEO) is the first fully integrated equity real estate investment trust (REIT) specializing in the design, financing, development, and operation of secure facilities, processing centers, and community re-entry centers in the United States, Australia, South Africa, and the United Kingdom.

As described on our company website and in our 2018 Annual Report (www.snl.com/interactive/newlookandfeel/4144107/GEOGroup2018AR.pdf), GEO's operations include the following:

- GEO U.S. Secure Services (www.geogroup.com/GEO_Secure_Services)
- GEO Care (www.geogroup.com/GEO-Care), which encompasses the GEO Continuum of Care®, GEO Reentry Services, Abraxas Youth Services, and BI Incorporated Electronic Monitoring
- International Services (www.geogroup.com/GEO_Secure_Services), which includes The GEO Group UK Ltd, The GEO Group Australia, and South African Custodial Management
- GEO Transport, Inc. (www.geogroup.com/GEO_Transport_Inc)
- The GEO Group Foundation (www.geogroup.com/foundation)

Additional details regarding GEO's structure and financial performance can be found on our Investor Relations website at: <http://investors.geogroup.com>

GEO FINANCIAL RESULTS

	2018	2017	2016
Revenues*	\$2,331,386	\$2,263,420	\$2,179,490
Operating Income*	\$264,665	\$248,285	\$265,584
Net Income*	\$144,827	\$146,024	\$148,498
Diluted EPS	\$1.20	\$1.21	\$1.33
Facilities in Operation	135	141	104
U.S. Employees	18,427	18,044	15,925
Total Employees	23,630	22,968	20,322

*\$ in Thousands (except for Diluted EPS amounts)

DHS-ICE-19-0926-C-000101

Human Rights & ESG Report

GRI Standard	Disclosure	Report Location or External GEO Reference
GRI 102: General Disclosures		
GRI 102: General Disclosures 2016	<i>Organizational profile</i>	
	102-1 Name of the organization	Letter from our Chairman, CEO and Founder; Page 2 10-K; Page 1
	102-2 Activities, brands, products, and services	About the GEO Group; Pages 6-7 Core Values & Mission Statement; Page 8 10-K; Pages 3-27
	102-3 Location of headquarters	Boca Raton, FL GEO HQ Facility Details 10-K; Page 1
	102-4 Location of operations	About the GEO Group; Page 6 10-K; Pages 174-186
	102-5 Ownership and legal form	Publicly-traded Real Estate Investment Trust 10-K; Pages 1 and 3
	102-6 Markets served	About the GEO Group; Pages 6-7 Core Values & Mission Statement; Page 8 10-K; Pages 3-27
	102-7 Scale of the organization	Financial Management and Performance; Page 73 10-K; Pages 3-53
	102-8 Information on employees and other workers	Creating Opportunities: Developing our People; Pages 40-44 10-K; Pages 24-25
	102-9 Description of the organization's supply chain	Engaging with Our Stakeholders; Page 59
	102-10 Significant changes to the organization and its supply chain	There have been no significant changes to the organization or its supply chain.
	102-11 Precautionary Principle or approach	Delivering on Our Promise: Ethics and Governance; Pages 61-62 Meeting Our Obligations: Oversight and Contract Compliance; Pages 64-67
	102-12 External initiatives	GEO Group ESG Process, Rationale and Objectives; Page 10
	102-13 Membership of associations	Creating Opportunities: Developing Our People; Page 43 Engaging with Our Stakeholders; Page 57 Delivering on our Promise: Oversight and Contract Compliance; Page 67
	<i>Strategy</i>	
	102-14 Statement from senior decision-maker	Letter from our Chairman, CEO and Founder; Page 2
	102-15 Key impacts, risks, and opportunities	GEO Group ESG Process, Rationale and Objectives; Page 10-13
	<i>Ethics and integrity</i>	
	102-16 Values, principles, standards, and norms of behavior	Core Values & Mission Statement; Page 8 Delivering on Our Promise: Ethics and Governance; Pages 61-62 Meeting Our Obligations: Oversight and Contract Compliance; Page 64-67 GEO's Code of Business Conduct and Ethics
	102-17 Mechanisms for advice and concerns about ethics	Delivering on Our Promise: Ethics and Governance; Pages 61-62 Meeting Our Obligations: Oversight and Contract Compliance; Pages 65-67 GEO's Code of Business Conduct and Ethics Business Code & Ethics: Anti-bribery Corruption Training & Whistleblower Programs

GRI Standard	Disclosure	Report Location or External GEO Reference
GRI 102: General Disclosures 2016	<i>Governance</i>	
	102-18 Governance structure	Delivering on Our Promise: Ethics and Governance; Page 62 2019 Proxy; Pages 14-21 2018 Annual Report; Pages 4-5
	102-20 Executive-level responsibility for economic, environmental, and social topics	Letter from our Chairman, CEO and Founder; Page 2 Delivering on Our Promise: Ethics and Governance; Page 62 Meeting Our Obligations: Oversight and Contract Compliance; Pages 64-67 2018 Annual Report; Page 6
	102-21 Consulting stakeholders on economic, environmental, and social topics	GEO Group ESG Process, Rationale and Objectives; Pages 10-12 Engaging with Our Stakeholders; Page 56
	102-22 Composition of the highest governance body and its committees	Delivering on Our Promise: Ethics and Governance; Page 62 2019 Proxy Statement; Pages 14-21
	102-23 Chair of the highest governance body	Delivering on Our Promise: Ethics and Governance; Page 62 2019 Proxy Statement; Page 10
	102-24 Nominating and selecting the highest governance body	2019 Proxy Statement; Pages 3-9; 17-19
	102-25 Conflicts of interest	Delivering on Our Promise: Ethics and Governance; Page 61 GEO's Code of Business Conduct and Ethics 2019 Proxy; Pages 19-20; 24
	102-26 Role of highest governance body in setting purpose, values, and strategy	GEO Group ESG Process, Rationale and Objectives; Pages 11-12 Delivering on Our Promise: Ethics and Governance; Page 62 2018 Annual Report; Page 6
	102-27 Collective knowledge of highest governance body	GEO Group ESG Process, Rationale and Objectives; Pages 11-12 Delivering on Our Promise: Ethics and Governance; Page 62 2018 Annual Report; Page 6
	102-31 Review of economic, environmental, and social topics	GEO Group ESG Process, Rationale and Objectives; Pages 10-11 GEO Human Rights Report: Criteria/Metrics Used to Assess Human Rights Performance; Pages 17-31 Making an Impact: Addressing Recidivism; Page 54
	102-33 Communicating critical concerns	Business Code & Ethics: Anti-bribery Corruption Training & Whistleblower Programs Corporate Policy & Procedure: Chapter 5 - Oversight
	102-35 Remuneration policies	2019 Proxy Statement; Pages 24-42
	102-36 Process for determining remuneration	2019 Proxy Statement; Pages 45; 47
	102-37 Stakeholders' involvement in remuneration	2019 Proxy Statement; Pages 45; 47
	102-38 Annual total compensation ratio	2019 Proxy Statement; Pages 43-44
	102-39 Percentage increase in annual total compensation ratio	2018 Proxy Statement; Pages 41-42 2019 Proxy Statement; Pages 43-44
	<i>Stakeholder engagement</i>	
	102-40 List of stakeholder groups	Engaging with Our Stakeholders; Page 56
	102-41 Collective bargaining agreements	Creating Opportunities: Developing Our People; Page 43

Human Rights & ESG Report

GRI Standard	Disclosure	Report Location or External GEO Reference
GRI 102: General Disclosures 2016	102-42 Identifying and selecting stakeholders	Engaging with Our Stakeholders; Page 56 ESG Process, Rationale and Objectives; Page 10-11
	102-43 Approach to stakeholder engagement	Engaging with Our Stakeholders; Pages 56-59 ESG Process, Rationale and Objectives; Pages 10-12
	102-44 Key topics and concerns raised	Engaging with Our Stakeholders; Pages 56-59 ESG Process, Rationale and Objectives; Pages 10-12
	<i>Reporting practice</i>	
	102-45 Entities included in the consolidated financial statements	Financial Management and Performance; Page 73 10K; Pages 93-94
	102-46 Defining report content and topic Boundaries	Letter from our Chairman, CEO and Founder; Page 2 ESG Process, Rationale and Objectives; Pages 10-12
	102-47 List of material topics	ESG Process, Rationale and Objectives; Pages 10-12 Engaging with Our Stakeholder; Page 56
	102-48 Restatements of information	This is GEO's first year issuing an ESG report.
	102-49 Changes in reporting	This is GEO's first year issuing an ESG report.
	102-50 Reporting period	January 1, 2018 - December 31, 2018
	102-51 Date of most recent report	This is GEO's first year issuing an ESG report.
	102-52 Reporting cycle	GEO expects to report on an annual basis.
	102-53 Contact point for questions regarding the report	IR@geogroup.com
	102-54 Claims of reporting in accordance with the GRI Standards	We referenced the GRI Standards during the development of this report and we include a GRI Standards Content Index for navigation and organization of our ESG disclosures. ESG Process, Rationale and Objectives; Page 10
	102-55 GRI content index	GRI Standards Content Index; Pages 74- 77
	102-56 External assurance	No external assurance is provided at this time.
Economic Topics		
GRI 102: General Disclosures 2016	<i>Economic Performance</i>	
	201-1 Direct economic value generated and distributed	2018 Annual Report; Page 40
GRI 204: Procurement Practices 2016	<i>Procurement Practices</i>	
	204-1 Proportion of spending on local suppliers	Engaging with Our Stakeholders; Page 59
GRI 205: Anti-corruption 2016	<i>Anti-corruption</i>	
	205-1 Operations assessed for risks related to corruption	GEO's Code of Conduct and Ethics articulates the company's policies and guidelines with respect to compliance with anti-bribery and anti-corruption laws.
	205-2 Communication and training about anti-corruption policies and procedures	The standards and policies described in each section of GEO's Code of Conduct and Ethics are communicated widely throughout our organization and reinforced with each of our employees through rigorous and ongoing training.
Environmental Topics		
GRI 302: Energy 2016	<i>Energy</i>	
	302-1 Energy consumption within the organization	Energy and Environmental Sustainability; Pages 69-70
	302-4 Reduction of energy consumption	Energy and Environmental Sustainability; Pages 69-70
	302-5 Reductions in energy requirements of products and services	Energy and Environmental Sustainability; Pages 69-71

Human Rights & ESG Report

GRI Standard	Disclosure	Report Location or External GEO Reference
Social Topics		
GRI 401: Employment 2016	<i>Employment</i>	
	401-1 New employee hires and employee turnover	Creating Opportunities: Developing Our People; Pages 40-41
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Creating Opportunities: Developing Our People; Pages 41-42, 44
GRI 403: Occupational Health and Safety 2018	<i>Occupational Health and Safety</i>	
	403-1 Occupational health and safety management system	Ensuring Safety and Security; Page 47
	403-2 Hazard identification, risk assessment, and incident investigation	Ensuring Safety and Security; Page 47
	403-5 Worker training on occupational health and safety	Ensuring Safety and Security; Page 47
GRI 404: Training and Education 2016	<i>Training and Education</i>	
	404-1 Average hours of training per year per employee	Creating Opportunities: Developing Our People; Pages 42
	404-2 Programs for upgrading employee skills and transition assistance programs	Human Rights Report; Pages 15-16 Creating Opportunities: Developing Our People; Pages 42, 44
GRI 405: Diversity and Equal Opportunity 2016	<i>Diversity and Equal Opportunity</i>	
	405-1 Diversity of governance bodies and employees	Creating Opportunities: Developing Our People; Pages 40-41
GRI 410: Security Practices 2016	<i>Security Practices</i>	
	410-1 Security personnel trained in human rights policies or procedures	Human Rights Report; Pages 15-16 Creating Opportunities: Developing Our People; Page 42
	<i>Human Rights Assessment</i>	
GRI 412: Human Rights Assessment 2016	412-1 Operations that have been subject to human rights reviews or impact assessments	Human Rights Report; Pages 31-38
	412-2 Employee training on human rights policies or procedures	Human Rights Report; Pages 15-16 Creating Opportunities: Developing Our People; Page 42
GRI 415: Public Policy 2016	<i>Public Policy</i>	
	415-1 Political contributions	<u>GEO Political Engagement</u>



The GEO Group, Inc. ®

WORLD HEADQUARTERS

4955 Technology Way

Boca Raton, Florida 33431 USA

561.893.0101 866.301.4436

www.geogroup.com

From: Daniel Ragsdale
Sent: 6 Feb 2020 16:19:41 +0000
To: Lummert, Nathalie
Subject: Re: [EXTERNAL] RE: Religious Services POC?
Attachments: HumanRightsESG2018.pdf

As discussed.

From: "Lummert, Nathalie" <Nathalie.Lummert@ice.dhs.gov>
Date: Thursday, February 6, 2020 at 8:23 AM
To: Daniel Ragsdale <dragsdale@geogroup.com>
Subject: [EXTERNAL] RE: Religious Services POC?

Dan,

I have no meetings tomorrow/Friday morning. If there is a particular time that works for you, I can call you.

I am out of the office all next week...

Nathalie
202 907 3064

From: Daniel Ragsdale <dragsdale@geogroup.com>
Sent: Wednesday, February 5, 2020 6:39 PM
To: Lummert, Nathalie <Nathalie.Lummert@ice.dhs.gov>
Subject: Re: Religious Services POC?

Hi Nathalie:

Good to hear from you! I'd love to catch up. Let me know what's a good time, and I hope all is well.

Let me see who is the best POC. It may still be Richard.

Best,

Dan

Get [Outlook for iOS](#)

From: Lummert, Nathalie <Nathalie.Lummert@ice.dhs.gov>
Sent: Wednesday, February 5, 2020 5:14:04 PM
To: Daniel Ragsdale <dragsdale@geogroup.com>
Subject: [EXTERNAL] Religious Services POC?

Good afternoon Dan,

I hope this note finds you well. I have a quick question. One of my team members who works on religious services is interested in connecting with someone at GEO who works on these issues. Previously, I believe we worked with Richard Glau? Can you tell me who would be a good POC. No issues, my team member just wants to pro-actively connect about chaplains, religious services, etc.

Separately, I would love to catch up with you sometime soon. I am working with a larger portfolio involving a number of special populations in custody and enjoying it...

Nathalie

Nathalie Lummert, Unit Chief
Special Populations and Programs
Custody Programs Division
Enforcement and Removal Operations (ERO)
U.S. Immigration and Customs Enforcement (ICE) | Department of Homeland Security (DHS)
202.907.3064 – Cell
Nathalie.Lummert@ice.dhs.gov



**Homeland
Security**

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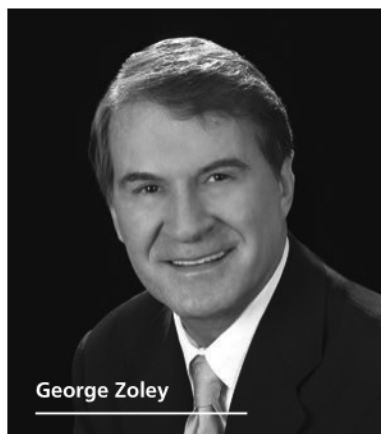


The GEO Group, Inc. ®

HUMAN RIGHTS AND ESG REPORT

2018

Human Rights & ESG Report



For more than 30 years, The GEO Group has been a trusted service provider to federal, state and local government agencies in the United States, delivering quality management and care for secure institutions, ICE processing centers, and community reentry facilities. Over the years, our company has evolved to become a leading provider of offender rehabilitation, post release services, and community-based programs.

Our three-decade long journey has been driven by a daily pursuit of operational excellence across all our service lines. We recognize that achieving excellence on a consistent basis requires frequent introspection and a commitment to taking steps to improve upon what we do every day.

This commitment led us to invest in a regional operating structure approximately two decades ago, bringing the daily oversight of our facilities closer to our clients and ensuring that we are able to respond as quickly as possible to any challenges that may arise in the delivery of our services. Today, our three regional offices are comprised of subject matter experts who provide direct oversight for our secure facilities across the United States.

Our commitment to continuous improvement also led us to pursue third-party accreditation for all our U.S. secure facilities, regardless of contractual requirements, as well as, all applicable non-secure community reentry facilities. This independent accreditation is based on standards set by leading organizations such as the American Correctional Association, the National Commission on Correctional Health Care, and The Joint Commission, among other entities. Today, our U.S. facilities are accredited by the American Correctional Association with an average accreditation score of 99.6 percent.

We are particularly proud of the commitment we have made as a company to improve the lives of those entrusted to our care by providing rehabilitation and reentry programs that can reduce recidivism and help them reintegrate into society.

Our GEO Continuum of Care® (CoC) integrates enhanced offender rehabilitation, including cognitive behavioral treatment, with post-release support services to address basic community needs including housing, transportation, food, clothing, and job placement assistance.

This innovative program began as a pilot at one GEO facility in 2015 and received the 'Innovation in Corrections' award from the American Correctional Association just three years later in 2018. We expect the CoC program to be expanded to include 23 GEO facilities by the end of 2020. GEO's 2019 annual funding commitment in support of the CoC program is approximately \$10 million, representing approximately 7% of GEO's net income.

The expansion of our GEO Continuum of Care® has led to an increase in the number of GED/High School Equivalency degrees, vocational training certifications, and substance abuse treatment completions awarded annually throughout our facilities.

These efforts are representative of our company's willingness to look inward for areas where we can improve on our delivery of services and programs. The publication of our first Human Rights and Environmental, Social & Governance (ESG) report is another step in that direction. As a company, we formalized our long-standing commitment to respecting human rights when our Board adopted a Global Human Rights Policy in 2013.

This report builds on that important milestone by providing disclosures related to how we inform our employees of our company's commitment to respecting human rights; the criteria we use to assess human rights performance; and our contract compliance program, remedies to shortcomings in human rights performance, and independent verification of our performance by third party organizations.

The report also addresses criteria, based on recognized ESG reporting standards, related to the development of our employees; our efforts to advance environmental sustainability in the construction and operation of our facilities; and our adherence to ethical governance practices throughout our company.

We are cognizant of the interest from our stakeholders in learning more about our company. We welcome this opportunity to constructively engage with our stakeholders, as we further refine our Human Rights and ESG disclosures going forward.

A handwritten signature in dark ink that reads "George Zoley".

George Zoley

Chairman, CEO and Founder

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DISCLAIMER STATEMENT

DISCLAIMER STATEMENT

GEO's Human Rights and ESG Report addresses the company's aspirational goals as a leading government services provider. Even with the best of intentions, and a sincere effort to follow our thoughtfully developed operational policies, there will at times unfortunately be shortcomings in our company's performance. Our 23,000 employees, who often face difficult operational challenges, are not always able to achieve their best efforts and the company's desired best outcomes.

FORWARD-LOOKING INFORMATION

This report contains certain forward-looking statements based on our management's current assumptions and expectations, including statements regarding our goals, commitments, programs and other business plans, initiatives and objectives. These statements are typically accompanied by the words "expect," "may," "could," "hope," "believe," "would," "might," "estimate," "anticipate," "plan," "aspire" or similar words. All such statements are intended to enjoy the protection of the safe harbor for forward-looking statements provided by the Private Securities Litigation Reform Act of 1995, as amended.

Although we believe there is a reasonable basis for the forward-looking statements made in this report, our actual future results, including the achievement of our targets, goals or commitments, could differ materially from our projected results as the result of changes in circumstances, assumptions not being realized, or other risks, uncertainties and factors. Such risks, uncertainties and factors include the risk factors discussed in Item 1A of our most recent Annual Report on Form 10-K filed with the Securities and Exchange Commission ("SEC") and our subsequent Quarterly Reports on Form 10-Q, as well as, with respect to our goals



GEO Headquarters

and commitments outlined in this report or elsewhere, the challenges, assumptions, risks, uncertainties and other factors identified in this report. You should consider the forward-looking statements in this report in conjunction with our Annual Report on Form 10-K and our subsequent Quarterly Reports on Form 10-Q and Current Reports on Form 8-K filed with the SEC.

The forward-looking statements in this report are made as of the date of this report, unless otherwise indicated, and we undertake no obligation to update these forward-looking statements to reflect subsequent events or circumstances.

DHS-ICE-19-0926-C-000112

COMPANY OVERVIEW ABOUT THE GEO GROUP



Human Rights & ESG Report

The GEO Group, Inc. (NYSE:GEO) is a publicly-traded, fully-integrated real estate investment trust (“REIT”) specializing in the design, financing, development, and operation of secure facilities, processing centers, and community reentry centers in the United States, Australia, South Africa, and the United Kingdom.

GEO provides complementary, turnkey solutions for numerous government agencies worldwide across a spectrum of diversified secure facility management, in-custody rehabilitation, community reentry programs, and electronic monitoring services.

As of December 31, 2018, GEO’s worldwide operations included the ownership and/or management of approximately 96,000 beds at 133 secure facilities, processing centers and community reentry centers, with a growing workforce of approximately 23,000 professionals.

Our corporate office is located in Boca Raton, Florida, and we have three regional offices, located in Los Angeles, California; San Antonio, Texas; and Charlotte, North Carolina.

GEO is organized into two business units: GEO Secure Services and GEO Care.

Throughout 2018, our GEO Secure Services business unit served over 300,000 individuals, while managing an average daily population of more than 60,000 in our state and federal facilities in the United States. Our GEO Care business unit served close to 700,000 individuals during the year, while managing an average daily census of 200,000 participants in our community reentry, youth services treatment, and electronic monitoring programs.

From the development and management of modern facilities to the provision of evidence-based rehabilitation and post-release support in the community, GEO offers fully-diversified, high-quality services to government agencies around the world. GEO operates in several different areas, including:

GEO’S WORLDWIDE OPERATIONS

96,000 Beds

133 Secure facilities, processing centers and community reentry centers

23,000 Professional Workforce

Federal services

GEO contracts with three federal agencies: Federal Bureau of Prisons (BOP), U.S. Marshals Service (USMS), and U.S. Immigration and Customs Enforcement (ICE).

State facilities

GEO manages correctional and rehabilitation facilities on behalf of state correctional agencies (i.e. departments of corrections) in the U.S.

County and local services

GEO manages a small number of county jails for local jurisdictions in the U.S.

Community re-entry services

GEO provides services in residential and non-residential reentry centers under contract with federal, state and local government agencies; these centers allow individuals to receive community services such as education, cognitive behavioral treatment, and employment assistance.

Human Rights & ESG Report

Youth treatment

Abraxas Youth Services manages youth treatment facilities, serving youthful individuals on behalf of state and local government agencies.

Electronic monitoring

Our BI subsidiary is a leading provider of electronic monitoring services -- including radio frequency, GPS, and alcohol monitoring technologies -- to federal, state, and local government agencies. At the federal level, BI provides electronic monitoring and case management services to ICE under the Alternatives to Detention Program, known as the Intensive Supervision and Appearance Program (ISAP).

Secure transportation

GEO's transportation division, GEO Transport, Inc. provides secure ground and air transfer services to federal, state, and local government customers in the U.S. and internationally.

Over the years, GEO and each of our employees have operated with a strong commitment to comply with all requirements set by our customers, and applicable regulatory authorities and oversight agencies -- especially those involving the safety and security of our employees, the individuals in our care, and the contractors and visitors at each of the facilities we operate.

We are constantly exploring ways to enhance care and improve outcomes as we aspire to be a leading provider of in-custody rehabilitation and community re-entry services. We established the GEO Continuum of Care® concept to provide enhanced, in-custody rehabilitation programs, including cognitive behavioral treatment, integrated with post-release support services.

This program has been steadily expanded to include 20 facilities at the end of 2019 with three (3) more planned by the end of 2020. Our evidence-based treatment begins with individualized risks and needs assessments and offers several unique and enhanced programs.

More details are provided in the Making an Impact: Addressing Recidivism section of this report, as well as, on our website at:
www.geogroup.com/GEOs_Continuum_of_Care



GEO aspires to be a leading provider of evidence-based rehabilitation across a diversified spectrum of secure and community reentry facilities and programs. We have refined and expanded our rehabilitation programs to reach greater numbers of individuals in our care and post-release through our GEO Continuum of Care®*.

GEO's diversified services platform provides organizational capabilities for the delivery of educational and vocational programs, substance abuse treatment, and faith-based services. The GEO Continuum of Care® integrates enhanced in-custody rehabilitation programs, including cognitive behavioral treatment, with post-release support services.



OUR MISSION

GEO's mission is to develop innovative public-private partnerships with government agencies around the globe that deliver high quality secure facility, community reentry, and electronic monitoring services, while providing enhanced rehabilitation and community reintegration programs to the men and women entrusted to our care.



OUR VALUES

Respecting Human Dignity and Rights

We believe every human being should be treated with dignity and that his or her basic human rights should be respected and preserved at all times.

Providing Leading, Evidence-Based Rehabilitation Programs

We are committed to providing leading, evidence-based rehabilitation programs to the men and women entrusted to our care.

Imparting a Safe and Secure Environment

We are committed to establishing and maintaining a workplace that is safe, secure and humane, not only for our trained and experienced professionals, but for the men and women entrusted to our care.

Maintaining Quality Facilities

We are committed to maintaining modern facilities that provide a safe and humane environment and adhere to independent accreditation standards.

*See section of ESG Report on Making an Impact: Addressing Recidivism and details provided on the GEO website at: www.geogroup.com/GEOs_Continuum_of_Care



GEO GROUP ESG PROCESS, RATIONALE AND OBJECTIVES



This is GEO's first Human Rights and ESG report developed referencing the GRI Standards (Global Reporting Initiative) and the UN Guiding Principles on Business and Human Rights. During the development of this report, we have engaged with many of our stakeholders to integrate their viewpoints into which areas of ESG we should focus on as a company.

We reference these two globally-accepted frameworks to provide our stakeholders, including investors, a standardized and transparent disclosure process in assessing our progress in the critical environmental, social responsibility and corporate governance (ESG) aspects of our organization.

As all of us at GEO continue our sustainability journey, we look forward to working with our stakeholders to evaluate our efforts for achieving continuous improvements in ESG.

BUILDING ON LONGSTANDING COMMITMENTS TO HUMAN RIGHTS AND SUSTAINABILITY

From a startup company more than 30 years ago, GEO has grown rapidly over the years to become a leader in the delivery of secure facility services, community reentry programs, and evidence-based rehabilitation. We have expanded both domestically and internationally and currently operate 133 facilities on behalf of government customers across four continents.

Dating back to our earliest years, we have operated with a strong commitment to ethics in all aspects of our business and to respecting the human rights of all persons in our care.

Across the U.S. and in all parts of the world where we operate, we comply with strict standards established by our customers, including the U.S. federal government, state governments, and local jurisdictions. We also adhere to operational and management guidelines developed by the numerous accrediting entities applicable to our operations.

We have worked closely with stakeholders, including numerous faith-based organizations and non-governmental organizations (NGOs) to expand the developmental, educational and employment opportunities available to those in our care. We also provide extensive training for our employees in compliance with the requirements of our government customers to prepare them to meet the rigorous performance objectives of the positions they hold within our organization.

GEO recognizes its commitment to all of our stakeholders and strives to be the best organization we can be for everyone in our care, our employees, the communities in which we operate, and our investors, as well as, the many businesses, religious and faith-based groups, unions and other organizations with which we have relationships. We strive daily to provide pathways and ongoing support for those in our care to achieve their rehabilitation objectives and re-enter their communities as productive citizens.

We recognize that our challenges continue to evolve, in some instances becoming increasingly complex. In response, we are continuing to take steps to enhance and improve our organizational capabilities and develop new resources to meet changing societal needs. Several years ago, we undertook a pilot initiative -- known as the GEO Continuum of Care® -- to address the challenge of recidivism.

This award-winning program -- which we have continually refined and expanded -- has proven effective at helping those in our care change their perspective, earn educational and vocational credentials as they prepare for re-entry into society, receive support upon release, and significantly improve their opportunities for personal success.

Today, communities throughout the country, as well as, many individuals in our care, face the challenge of dealing with the devastating epidemic of opioid addiction. We have been working with our stakeholders and those in the medical community to find effective ways to help victims of addiction survive and emerge from their dependencies.

Our team is working hard to ensure that our approach continues to produce higher rates of successful outcomes for those in our care. *[For more details, see section Making an Impact: Addressing Recidivism.]*

OUR COMMITMENT TO RESPECTING HUMAN RIGHTS

For more than three decades, GEO has maintained a strong commitment to respect human rights, extending to all of our approximately 23,000 employees and contractors and more than 250,000 individuals in our care at any given time.

Our board of directors formalized this longstanding commitment with the adoption of a Global Human Rights Policy in 2013, in recognition of the critical role that respect for human rights plays in our operations in the United States and around the world.

As part of this policy, we provide a safe, secure environment, nutrition, clothing, sanitation, and timely access to medical and dental care as required by our government contracts. At all of our facilities, we provide climate-controlled environments for those in our care, which is particularly important since many of our facilities are located in areas prone to intense heat or weather conditions. *[For more details, see section Our Commitment to Respecting Human Rights.]*

We embrace diversity across our enterprise. Women and minorities account for the majority of our U.S. employee population and comprise a significant percentage of our officers and managers at all levels of our organization. *[For more details, see section Creating Opportunities: Developing Our People.]*

Regarding environmental responsibility, we have been tracking our utilities at each of our facilities for the past several years in an effort to encourage conservation and sustainability. We have embraced green building concepts at all of our new facilities and in the refurbishment or revitalization of our existing facilities. *[For more details, see section Energy and Environmental Sustainability.]*

Our board is composed of a majority of independent directors, and we are diligent in all of the various aspects of corporate governance and investor relations.



**UNITED NATIONS
HUMAN RIGHTS**
OFFICE OF THE HIGH COMMISSIONER

REFERENCING THE GRI STANDARDS AND UN GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS

Even as we have embraced many elements associated with a sustainable enterprise, we recognize the need for a transparent and disciplined enterprise-wide approach.

In our pursuit of this type of approach, we have referenced the GRI Standards and The UN Guiding Principles on Business and Human Rights in developing this report, and we have begun with the following set of ongoing objectives:

- Provide greater transparency for our stakeholders and the general public with respect to our various efforts in all our facilities aimed at respecting human rights.
- Enhance our ability to flag potential issues in all areas of our operations and compress the time it takes to respond with corrective measures.
- Use widely accepted methodologies for evaluating performance and setting objectives for improvements in corporate governance, corporate social policy, environmental impact and energy conservation.

In the process of gathering and preparing content for this initial report, which covers 2018 with supporting data from 2016-2018 where possible, we have been able to establish a baseline for many of the activities that we plan to evaluate and report on over time.



HUMAN RIGHTS REPORT

**ORGANIZATION OF HUMAN RIGHTS
AND ENVIRONMENTAL, SOCIAL, AND
GOVERNANCE (ESG) REPORT**

GEO's first Human Rights and ESG Report is organized as follows. The Human Rights Report is addressed first and is structured in the following manner:

- I. How GEO ensures that its employees are aware of, and know how to apply, the company's commitment to inmate/detainee human rights;
- II. Criteria/metrics used to assess human rights performance; and
- III. Contract compliance program, GEO remedies to shortcomings in human rights performance, and independent verification of GEO performance by third party organizations

GEO's Human Rights Report is followed by GEO's ESG Report.

This report addresses how GEO respects, and implements its respect for, human rights among its secure residential care facilities involving inmates or detainees. But before we begin that discussion, we would like to make the readers aware of services that we do not provide.

WHAT WE DON'T DO

- **We don't manage any shelters or facilities housing unaccompanied minors.**
- **We don't manage any border patrol holding facilities along the U.S. Southwest border.**
- **We don't manage any facilities with tent structures or chain-link fencing in housing areas.**
- **We don't play a role in advocating for criminal justice or immigration laws.**

WHAT WE DO

- **GEO is proud to be a world leader in offender rehabilitation that we provide at eighteen (18) state correctional facilities through the GEO Continuum of Care® program.**
- **The GEO Continuum of Care® (CoC) is enhanced in-custody offender rehabilitation programming, including cognitive behavioral treatment, integrated with post-release support services.**
- **At the Corporate Office level, the CoC Program is administered by the GEO Continuum of Care® (CoC) Division which has expanded to 50 staff with subject matter experts in education, cognitive behavioral treatment, substance abuse treatment, post-release services, CoC training, and quality assurance.**
- **During 2019, GEO increased its annual commitment for CoC funding to \$10 million representing approximately 7% of the company's net annual profits.**
- **On any typical day, there are approximately 30,000 participants enrolled in GEO offender rehabilitation programming, which resulted in 6.7 million programming hours completed during 2018.**
- **GEO's focus on offender rehabilitation assisted individuals in achieving the following in 2018:**
 - **2,779 High School Equivalency Diplomas**
 - **9,131 Vocational Certificates**
 - **8,842 Substance Abuse Certificates**
 - **44,518 Programming Completions**
 - **32,419 Behavioral Program Completions**
- **GEO's CoC rehabilitation program includes cognitive behavioral therapy that identifies the individual's criminogenic risks and develops an appropriate treatment plan.**

- The Corporate CoC Division Case Managers coordinate with the facility Case Managers regarding the progress and eventual release of the CoC offender participants.
- At GEO's Corporate Office, 12 Post-Release Case Managers provide post-release support services on a 24/7 basis, aiding offenders in fulfilling their most critical needs following release back into the community. Needs include housing, clothing, food, employment, and transportation assistance.
- On a daily basis, the GEO Post-Release Case Managers are supporting over 1,300 individuals reintegrating into their communities through our post-release support services.
- On January 8, 2018, GEO was proud to accept the "Innovation in Corrections" Award at the American Correctional Association (ACA) Winter Conference in Orlando, Florida for the GEO Continuum of Care® Program at the Graceville Correctional and Rehabilitation Facility in Florida.
- During 2019, we were very pleased to be able to expand the number of CoC facilities to 20. This is being accomplished through additional funding by the states of California and Oklahoma, as well as GEO.
- For 2020, we expect to further expand the CoC Program to an additional three (3) facilities bringing the total CoC facilities to 23 which will include every GEO-managed state facility.
- All of GEO's facilities are highly rated by independent accreditation entities including:
 - The American Correctional Association;
 - The National Commission on Correctional Health Care; and
 - The Joint Commission.
- We advocate for public-private partnerships that deliver private sector solutions to public sector challenges with strict government oversight.
- The facilities we manage typically have on-site, full-time government monitors.
- We manage modern immigration processing facilities under contracts with the U.S. Immigration and Customs Enforcement (ICE), which have such amenities as:
 - Artificial turf soccer fields;
 - Flat screen TVs in living areas;
 - Indoor and outdoor recreation;
 - Classrooms;
 - Multipurpose rooms; and
 - Libraries.
- We proudly operate our ICE processing centers in accordance with the Obama-Biden Administration's Performance-Based National Detention Standards (PBNDS) inclusive of applicable waivers.
- We provide safe and humane residential care for civilly-detained individuals during the adjudication of their immigration cases, with an average length of stay of 50 to 60 days.
- The professional services that we provide today, at the ICE Processing Facilities that we manage, are no different from the services we provided for eight years under the Obama-Biden Administration.
- We manage federal facilities for the U.S. Bureau of Prisons that are reserved almost exclusively for non-citizen criminal aliens.
- We note that the overwhelming majority of correctional and detention facilities in the United States are managed and operated by public governmental agencies. Less than 7% are managed and/or operated by private contractors.

GEO HUMAN RIGHTS REPORT: OUR COMMITMENT TO RESPECTING HUMAN RIGHTS



I. GEO ENSURES THAT ITS EMPLOYEES ARE AWARE OF, AND KNOW HOW TO APPLY, THE COMPANY'S COMMITMENT TO INMATE/DETAINEE HUMAN RIGHTS

We acknowledge that the human rights of all persons who we employ or who may be in our care are to be respected without discrimination, bias, or favoritism. To reinforce our commitment to respect the human rights of all who we care for or employ, we promote and support that commitment through company-wide awareness and training programs.

Human rights awareness and training of our staff promotes the understanding that it is everyone's responsibility to make the respect for human rights a part of all decision making. Our human rights training represents an important investment in our ongoing efforts to achieve a culture in which the human rights of all persons are valued and respected.

All new GEO employees -- including our facility and program staff who work directly with any individuals in our care -- are required to complete our human rights training. The GEO Group human rights training module is available on our website and can be accessed at: www.geogroup.com/Portals/0/Human_Rights_Training.pdf

- GEO's Commitment to Human Rights
- Core Correctional Practices
- Social and Cultural Awareness
- Understanding the Individuals in our Care
- Workplace Violence Prevention Program
- Suicide Awareness and Intervention
- Interpersonal Communication Skills
- Prison Rape Elimination Act (PREA) Training
- Staff Professionalism and Ethics
- Facility Grievance Procedures
- Health Insurance Portability and Accountability Act (HIPAA)
- Telephone, Mail and Visiting Procedures
- Religious Opportunities
- Accountability and Security Procedures
- Life Safety and Emergency Procedures
- Use of Force Regulations and Procedures
- Emergency Planning and Response Procedures
- Facility Disciplinary Procedures
- Search Procedures
- CPR, AED and Basic First Aid
- Report Writing
- Personal Protective Equipment
- Giving Direction
- Contingency Management
- Universal Precautions



Human Rights & ESG Report

In addition, GEO has a robust training program for staff at all levels of the organization. Our training of managerial, administrative, and security staff is based on American Correctional Association (ACA) standards. The training is a minimum of 120 hours of training within the staff member's first year of employment and 40 hours of recurring training in each consecutive year of employment.

Training includes classroom, practical exercises, course examinations, and on-the-job training. GEO's corporate policy mandates that every new employee receive orientation training prior to undertaking any assignments.

Contractor and Volunteer Training

GEO has developed a training format designed to introduce all contractors and volunteers to our facilities and programs. This is a self-paced course that must be completed prior to beginning their services. The course includes GEO's Commitment to Human Rights, Facility Rules and Regulations, Inmate/Resident Rights and Responsibilities, and Entry and Exit Procedures.

Continuum of Care Training Institute

The GEO Continuum of Care® Training Institute trains all staff from the time of hire and regularly throughout their employment. Our staff development plans include basic training, refresher training, advanced training, skillset certifications, and new manager's training.

Staff also receive training on contract-specific requirements, communication and de-escalation skills, self-defense, group facilitation, and our internal proprietary case management system. In addition, we provide training on Evidenced Based Practices, Motivational Interviewing techniques, Trauma Informed Care, and training specific to the types of programs offered to participants.

Online Learning Management System

To provide our employees with the most up-to-date training materials, online courses, and training reporting, we use an internal, online Learning Management System. This system is available to employees 24/7 and includes self-guided courses and reference materials for various topics.



Training Workshop

*Minimum 120
hours of training
within the first year
of employment.*

II. CRITERIA/METRICS USED TO ASSESS HUMAN RIGHTS PERFORMANCE REGARDING INMATES AND DETAINEES

GEO acknowledges the unique nature of its operations as a provider of management services for correctional and immigration processing facilities. We recognize the significant role that respect for human rights plays in our operations in the United States and around the world.

- Safe and Humane Environment
- Access to Healthcare
- Access to Legal Services
- Access to Family / Friends Communications
- Access to Religious Opportunities
- Access to Safe and Nutritious Meals
- Access to Recreational Amenities
- Access to Rehabilitation Programs for State Inmates

• SAFE AND HUMANE ENVIRONMENT

We respect the right of all persons to have a safe and humane environment, and our commitment to this right is unwavering. Our goal of ensuring a safe and humane environment for everyone in our care calls for us to follow many sets of client standards that define and proscribe the daily operation of our facilities and programs.

We think it is important to point out the difference in staffing for civil detention at GEO's ICE processing centers, versus that of GEO's state correctional facilities. The additional staffing at GEO's ICE processing centers is necessary to comply with the civil detention standards established under President Obama's administration and continued under President Trump's administration.

Overall staffing at GEO's ICE processing centers is approximately 30% more than that of GEO's state correctional facilities. The additional general staffing is needed to provide more (direct) supervision and transportation services for ICE detainees.

Healthcare staffing at GEO's ICE processing centers is approximately 117% more than that of GEO's state correctional facilities. The additional healthcare staffing is needed to provide appropriate treatment for detainees who have numerous health and mental health needs due to arriving from countries with limited healthcare services.



GEO Medical Staff at Broward Transitional Center



GEO Officer at Broward Transitional Center



GEO Educational Program at Arland Female Community Reentry Facility

GEO facilities, compared to government facilities, are newer, air-conditioned, and provide better living conditions and enhanced rehabilitation programs:

- **95% of GEO's facilities are less than 25 years old, compared with 33% of all state correctional facilities in the United States that are less than 25 years old**
- **100% of GEO's facilities are air-conditioned**
- **100% of the 800 academic and vocational classrooms in GEO's facilities have electronic SMART Boards for interactive computer assisted curriculum**
- **18 GEO state facilities provide the Continuum of Care Program with additional rehabilitation staffing to foster improved case management, cognitive behavioral treatment, basic education, vocational training, and post release services**
- **Average daily attendance in vocational and academic programs was 30,000 in 2018**
- **2,779 high school equivalency degrees were awarded in 2018, along with 9,131 vocational certifications**
- **Most GEO facilities for ICE and the BOP have artificial turf soccer fields and covered pavilions**
- **All GEO facilities have flat screen TVs in the housing areas, legal libraries and general libraries**

Montgomery ICE Processing Center



Blackwater River Correctional and Rehabilitation Facility

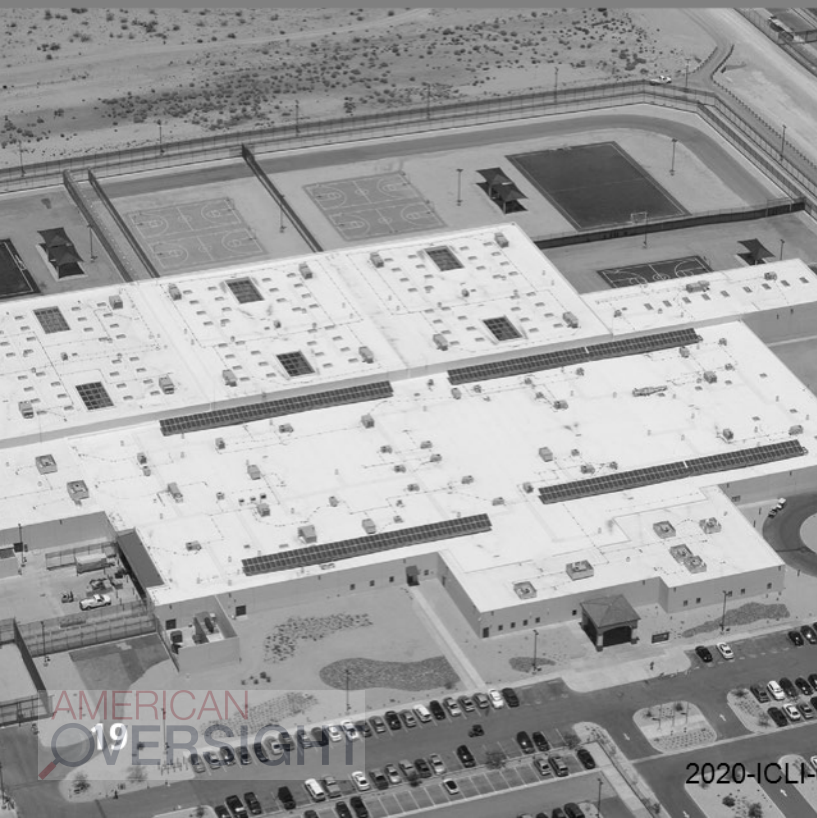


Human Rights & ESG Report

Broward Transitional Center



Adelanto ICE Processing Center



LIFE SAFETY & PHYSICAL PLANT

GEO facilities are under the oversight of the GEO Design and Construction Division located at the Corporate Office. This Division has one dozen subject matter experts in facility design, project management, maintenance and repair, and physical plant operations. The division is led by a Senior Vice President with three decades of facility development and maintenance experience. The Division undertakes all new facility development and oversees physical plant maintenance and repair for GEO's 133 facilities.

Our facilities are maintained to be compliant with life-safety codes, fire protection standards and regulations developed by the National Fire Protections Association (NFPA), Occupational Safety and Health Administration (OSHA), and American Correctional Association (ACA).

Physical plant inspections are conducted on a scheduled basis and are comprehensive to ensure the integrity of the facility and the safety of all individuals in our care and our valued employees.

Each facility:

- employs a trained Fire/Safety Manager responsible for life safety, physical safety, environmental governance and compliance with OSHA, EPA, ACA, and customer requirements;
- undergoes a hazard assessment every three years conducted by professional engineers to review the soundness of the physical plant, utilities systems, fire and natural disaster resistance; and
- undergoes a comprehensive life safety inspection conducted by the relevant State Fire Marshal's office at least annually.



DHS-ICE-19-0926-C-000127

PREA (PRISON RAPE ELIMINATION ACT)

GEO has zero tolerance for all forms of sexual abuse and sexual harassment in our facilities and programs. It is our policy that sexual conduct between employees, volunteers, or contractors and the individuals in our care, regardless of consensual status, is strictly prohibited and subject to administrative and criminal disciplinary sanctions.

Since January 2013, facilities within each GEO division are expected to strictly follow and comply with Section 28 C.F.R. Part 115 of the Department of Justice's (DOJ) Prison Rape Elimination Act National Standards or 6 C.F.R. Part 115 of the U.S. Department of Homeland Security's (DHS) Standards to Prevent, Detect and Respond to Sexual Abuse and Assault in Confinement Facilities.

The PREA Program is supported in multiple ways, including corporate, customer and third-party oversight, training for and communication to all employees and individuals, and thorough investigation of all allegations. Dedicated PREA administrative staff at GEO's corporate, regional and facility levels are responsible for all aspects of the PREA Program compliance.

All GEO facilities subject to PREA standards must be audited at least once during a three-year audit cycle to be considered compliant with those standards, with at least one third of each facility type audited each year of the three-year audit cycle. Each facility seeking PREA compliance is responsible for retaining a third-party U.S. Department of Justice-Certified Auditor to conduct audits during the three-year compliance cycle.

PROTECTION FOR VULNERABLE INDIVIDUALS

GEO utilizes a classification plan to determine the needs and requirements for everyone in our care. The classification plan includes interviews, record reviews and other assessments to determine security levels, vulnerability status, medical requirements, appropriate housing and program assignments, and any special needs.

Special needs individuals may include those suffering from substance abuse, those who are emotionally disturbed or mentally/developmentally disabled, and those who pose a high risk or who are determined to require placement in protective custody.

Individuals are classified to the most appropriate level of security and programming both upon admission to the facility and upon any subsequent review of their status. Staff members involved with classification plans include professionals in the fields of medical and mental health care, programming and counseling, religious services, dietary and nutrition, and security.

In instances where our government contracts require males and females to be housed at the same facility, GEO's policies ensure that individuals of different genders are housed in separate housing areas. These policies dictate strict physical and verbal separation and often no visual contact as well. All procedures are developed and executed consistent with our government customer policies and requirements. GEO's policies are also based on security considerations, the physical layout of the facility, and daily facility schedules including meals, recreation, medical care and general movement.

New Castle Correctional Facility
PREA Recertified in 2019



Human Rights & ESG Report

**South Bay Correctional and Rehabilitation
Facility PREA Recertified in 2019**



**Desert View MCCF
PREA Recertified in 2019**



**RESTRICTIVE HOUSING UNIT (RHU)
POLICIES**

GEO has implemented policies to provide restrictive housing when necessary, typically limited to those circumstances which threaten the secure and orderly management of each facility. These policies are consistent with policies and standards set by our government customers.

Individuals posing a threat to others or a danger to themselves are, when necessary to ensure their safety, removed from the general population and placed temporarily in restrictive housing. Facility-specific written policies and procedures are in place governing the admission, operation, supervision and release of individuals in special management housing or restrictive housing including administrative status, protective custody and disciplinary restriction.

A written, individualized plan is created whenever a person is placed in restrictive housing and reviewed with the individual by locally designated professional staff. The plan is designed to return the individual to less restrictive conditions as promptly as possible. A multi-disciplinary staff committee at each facility reviews the progress of every individual against that person's individualized plan on a weekly basis at a minimum. The physical, behavioral, and mental health of each individual is assessed on a constant basis.

**SUPERVISION IN RESTRICTIVE
HOUSING UNITS (RHU)**

GEO staff provide regular supervision in Restrictive Housing Units in order to permit officers to hear and respond promptly to any emergency. All individuals in a Restrictive Housing Unit must be personally observed at least twice per hour.

GEO staff utilize the "PIPE Security System", which provides documentation for the frequency/observation of each cell by a security staff member, utilizing an electronic handheld scanner, or "PIPE", designed to record rounds in the Restrictive Housing Units.

During each round, staff touch the handheld PIPE device to the sensor button located adjacent to each cell door. Physical contact with the sensor button is required in order for the device to record the cell check. The PIPE device records these rounds and stores the information in the device. At least twice per shift, the information is downloaded from the device to create verifiable documentation of rounds. GEO policy requires that a manual log of all rounds in Restrictive Housing also be maintained.

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• ACCESS TO HEALTHCARE

The healthcare needs of the individuals in our care are often significant. Those needs can include acute or chronic healthcare conditions, and/or mental health issues, including despair, anxiety, depression, fear, thoughts of self-harm and suicidal ideation.

Healthcare staffing at GEO's ICE processing centers is approximately 117% more than that of GEO's state correctional facilities. The additional healthcare staffing is needed to provide appropriate treatment for detainees who have numerous health and mental health needs due to arriving from countries with limited healthcare services.

Although, GEO is typically responsible for the healthcare at our facilities as an ancillary component of our general management, we are sometimes not the direct provider of healthcare services. In some cases, our client determines who the healthcare provider will be.

According to statistics from the U.S. Department of Justice, the mortality rate in state correctional facilities averages 256 per 100,000 inmates. In the federal prison system, the average mortality rate is 225 per 100,000 inmates. By comparison, the mortality rate at ICE processing centers is significantly lower at less than three per 100,000 detainees.

GEO-provided healthcare services are under the oversight of the GEO Healthcare Division located in the Boca Raton, Fla. Corporate Offices. The Division is led by a Chief Medical Officer with four decades of experience in clinical medicine. He is supported by 12 subject matter experts in correctional healthcare, dental services, mental health services, quality control, administration, and off-site healthcare claims management, as well as clinical care support. The Corporate Healthcare Division monitors staff vacancies, clinical outcomes, special incidents, clinical encounters, outside patient care, medication management, and updates to clinical guidelines.

For all facilities at which GEO provides health services, local oversight and support for healthcare is provided through one of GEO's three Regional Offices, located in

Charlotte, North Carolina; San Antonio, Texas; and Los Angeles, California. Each Regional Office has a Regional Director of Correctional Health Services, and each Regional Director is supported by up to three Regional Managers of Correctional Health Services.

GEO strives to ensure that healthcare staff, including medical, nursing, dental, and mental health professionals, are available to provide care for everyone in our care. Through established staffing plans, these individuals fulfill their clinical and administrative responsibilities and work synergistically with our security staff to address any health situation that may arise. Our security staff are also trained to manage an urgent/emergent health situation when healthcare staff may not be immediately available, in accordance with GEO's policies and well-defined procedures.

Initial screening for medical, mental health and dental care is to be completed as soon as possible after intake, and generally within 12 hours of reception at our facilities. Those who are identified as most seriously ill are prioritized for immediate clinical evaluation.

Medical Exam Room at
GEO's Montgomery Processing Center



Our goal is for full healthcare exams to be conducted by a qualified physician, Nurse Practitioner, Physician Assistant or Registered Nurse within 14-calendar days following admission. Based on the results of the full medical examination, diagnostic and therapeutic plans, for any identified conditions, are developed clinically as indicated.

All individuals in our care have coordinated access to healthcare services. They are given the opportunity to submit oral or written healthcare requests at least daily. These requests are then picked up each day by healthcare staff and are reviewed and prioritized by qualified healthcare professionals.

All individuals in our care have the right to refuse or question the healthcare they are receiving through an established grievance process. This process is an important component of our Quality Improvement program.

Once a grievance has been submitted and reviewed, the issues raised are evaluated and immediate corrective action is taken if warranted. Face-to-face interviews are often recommended, so problems can be resolved effectively and promptly. The grievance process is carefully explained to all individuals in our care.

Suicide risk assessment and prevention is an important objective of GEO's healthcare services. Our suicide prevention program is clearly defined in policies and procedures and serves to minimize the occurrence of a suicide by reducing risk and self-destructive individual behaviors.

We take our responsibility to provide prompt and comprehensive health and mental health care to everyone in our care seriously as evidenced by the policies, practices and professional guidelines we follow in our facilities, including independent standards set by the American Correctional Association, the National Commission on Correctional Health Care, and the Joint Commission.

• ACCESS TO LEGAL SERVICES

Access to Leisure and Law Library

In accordance with standards promulgated by our company and our government customers, as well as, the American Correctional Association, we facilitate opportunities for those under our care to access leisure and law library services.

Our facilities are equipped with comprehensive leisure and law library resources, including computers or kiosks containing LexisNexis, a legal software application that enables powerful document and keyword searches to facilitate efficiency and confidentiality. Our libraries generally operate seven days a week, and include additional scheduling during evenings and weekends, which extends library access.

Our libraries are staffed with qualified personnel who provide technical support and manage ordinary maintenance associated with library needs, including LexisNexis software updates, notary services, inter-library loan programs, and replenishing library supplies.

Legal Library Computer Stations at
Broward Transitional Center



Access to Telephones

GEO ensures every individual in our care is afforded access to telephones, both immediately upon arrival and thereafter following their processing and housing assignment. The contracted telephone carriers are generally arranged by our government partners, who negotiate the rates for use of the phone services. Where standardized telephone carriers are not established by our government partners, GEO will enter into similar agreements with contracted telephone carriers.

Our housing areas are equipped with banks of telephones, most of which have attached privacy panels or full privacy enclosures. We provide access to telephones during operational hours and ensure private rooms are available for those who request unmonitored legal calls in a confidential setting. We prominently display contact numbers for a variety of entities, including our government customers, consulates (free of charge), legal advocates, legal rights groups, legal support services, PREA assistance and a 24/7 hotline.

Phone Banks at GEO's Broward Transitional Center



Access to Attorney Visits

All individuals under our care have access to attorneys through a variety of opportunities, including telephonic contact, onsite contact visits, onsite non-contact visits, onsite private visits in one of GEO's designated legal rooms or via marked legal mail. In order to protect attorney-client privilege and the confidentiality of legal material, incoming legal mail is handled as "time sensitive" and never opened and scanned by staff without the named addressee present; all outgoing legal mail is sealed by the sender and promptly placed in the mail for timely delivery.

In many jurisdictions, depending on rules established by our government customers, legal representatives are not required to be the assigned attorney of record to meet with any individuals in our care. With notice and when reasonably practical, GEO will also accommodate attorney requests to meet with their clients outside of normal hours.

Access to ICE Case Officers in ICE Processing Centers

U.S. Immigration and Customs Enforcement (ICE) Processing Centers are designed and built in strict adherence with ICE Building Standards, which generally include a substantial area for ICE onsite personnel responsible for contract oversight, as well as, ICE agents designated as case officers.

In addition to meeting face-to-face with individuals in our care on a scheduled basis, onsite ICE case officers have a secure mailbox within each housing area whereby any resident can submit a request to meet with his or her assigned ICE case officer outside the standing schedule.

In circumstances where an ICE Processing Center does not have an onsite case officer, regularly scheduled visits by offsite ICE case officers are conducted. In addition, a secure mailbox designated for ICE correspondence is available in all housing areas and is processed daily. Residents can also initiate a request to a GEO case manager or supervisory manager for assistance in contacting ICE case officers.

Facility Handbook

We have made it our goal to ensure all individuals in our care receive information regarding everything from intake to release, with an emphasis on how to access information requests, grievances, medical care, legal services, food services, education, telephone, visitation and recreation.

Human Rights & ESG Report

GEO provides every individual in our care a facility handbook. Our facility handbooks are intended to augment the orientation received upon arrival. These handbooks are printed in English and Spanish, with availability of translation services for those who speak a native language other than the printed material.

Access to Translation Services/Language Line

GEO facilities have a diverse workforce often with bilingual staff members. In our ICE Processing Centers, as well as for GEO's Secure Services' other clients, a language service line is provided which accommodates language barriers associated with both written and oral communication. These language lines are available at all times. They are commonly used when communication barriers cannot be overcome with staff translators, or when requested by our residents, or individuals representing them.

Access to Free Consulate Calls

GEO recognizes the importance of the ability of individuals in our care to communicate with consulate representatives. Our company provides free calls to consulate representatives, and a listing of consulate contacts is posted in the housing areas near the telephones. We promote this service during orientation and throughout each facility.

Established Grievance Procedure with at Least One Level of Appeal

GEO provides a grievance process grounded in accessibility, confidentiality, fairness, objectivity and integrity, without fear of retaliation. We provide access to grievance forms and generally make them available in the housing areas and libraries. A secure, locked box is available in the housing areas for placement of completed grievance forms.

Grievances are ordinarily collected daily, logged and processed to the appropriate department staff for review and timely response. The fidelity of our process lies in having an independent, second level appeal opportunity. GEO regional offices or representatives from our government customers, depending on jurisdiction rules, review the original grievance filed and the facility response and render a decision to approve or deny the grievance appeal.

• ACCESS TO FAMILY/FRIENDS COMMUNICATIONS

We recognize the importance of communication in the lives of all individuals in our care, and, subject to appropriate safety and security safeguards, we go to great lengths to ensure that they are able to communicate in a meaningful and timely way with their family members, friends, and legal representatives without undue time or privacy constraints.

Social support is critical in all our lives, and we strive to reduce barriers so that support systems remain intact for those in our care. All individuals have access to telephones, banking, visitation, mail services, writing materials, and access to volunteers and support organizations.

GEO provides a welcoming environment for all friends and family. Family and friends are accommodated throughout their visit. Snacks and drinks are available through fully stocked concession and vending machines. Family activities and games are also available in each facility's visitation area. Individuals who do not receive visitors are able to connect with family members through telephone calls and mail, and in some instances, through virtual visits via Wi-Fi tablets.

Telephones are available in each housing area so that individuals can maintain contact with family and friends who are not able to visit. Individual accounts are made available for family and friends to provide funding for canteen services, telephone service and other items. Access to writing materials and postage is also available to everyone in our care.

A variety of organizations and volunteers are also on site to provide support and connection at our facilities. Individuals may attend seminars, services and celebrations. Organizations and volunteers are a great resource for individuals who do not have family or friends nearby.

All individuals have access to telephones, banking, visitation, mail services, writing materials, and access to volunteers and support organizations.

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Human Rights & ESG Report

• ACCESS TO RELIGIOUS OPPORTUNITIES

We respect the right of everyone in our care to practice and follow the teachings of their faith preferences. Our diligence in the application of best-practices ensures opportunities for individuals to practice, assemble, choose religious dietary options, and have access to religion-specific credentialed clergy and spiritual advisors.

Within GEO facilities at any given time, there are approximately 40 different faith preferences, including but not limited to Judaism, Christianity, Islam, Hinduism, Buddhism, Sikhism, etc., as well as, other faith groups such as Wicca, Santeria, and Odinism.

All Chaplains at GEO facilities are professionally accredited and recognized by an ecclesiastical authority of their faith, but out of necessity remain faith-neutral in the facilitation of this wide variety of services. This ensures every individual in our care feels the freedom to exercise his/her faith without fear of discrimination.

To promote a sense of acceptance and safety within the spaces utilized for religious worship, pictures, icons and other religious paraphernalia unique to any one religion are removed or covered after each service. All the spaces in our facilities that are used for religious worship and instruction are multi-purpose rooms or stand-alone buildings.

The practice of any belief system may include a certain amount of educational, doctrinal, devotional, and practical instruction. For this reason, our chaplaincy staff makes faith-specific resources available in print, DVD, CD and video when available.

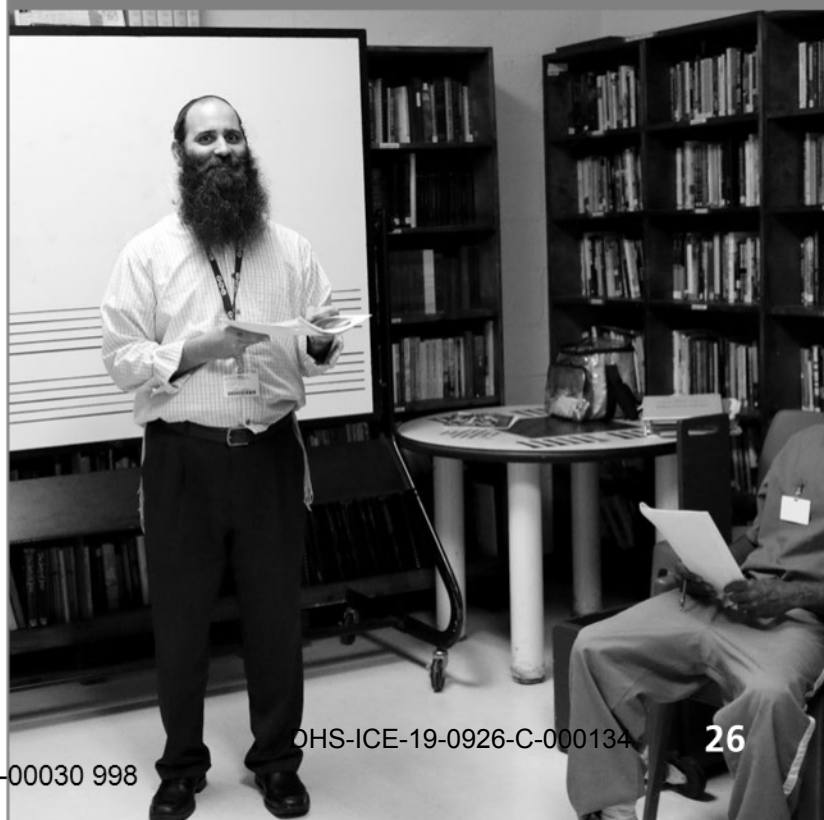
Individuals in our care are encouraged to contact religious organizations directly to request materials on a personal basis. In addition, specific alternate diets are readily accessible to satisfy a religious dietary requirement. Individuals can request alternate diets through each facility chaplaincy program.

Our Chaplains recruit, train, approve, and encourage volunteers locally to teach religious educational classes, facilitate faith-neutral and faith-based life skills programming, lead religious services, mentor, and act as informal spiritual advisors. We have engaged the time, talent and commitment of over 2,500 faith-based volunteers nationwide.

Chapel at GEO's Western Region Detention Facility



Faith Based Services at GEO's South Bay
Correctional and Rehabilitation Facility



Human Rights & ESG Report

• ACCESS TO SAFE AND NUTRITIOUS MEALS

Achievement of Successful Health Department Inspections for Facility Kitchens

Facility cleanliness and sanitation is a continuous objective. GEO Food Service areas are systematically inspected by food service staff. All kitchens operated by GEO, or on behalf of GEO, are required to meet or exceed all local, state and federal guidelines pertaining to institutional food service operation (e.g., public health, OSHA). The food service areas in our facilities are frequently audited by regulatory agencies and our government customers.

Successful Annual Facility Drinking Water Inspections by Governmental Entities

Annually, water municipalities provide our facilities with Consumer Confidence Reports also known as annual drinking quality reports as required by the U.S. Environmental Protection Agency. These reports reflect the compliance of drinking and wastewater with all applicable regulations and standards.

Specifically, these reports provide information relating to where the water comes from, the list and levels of regulated contaminants, any potential side effects and a comparison against national standards. These evaluations ensure we are providing safe and clean water.

Facility Menus Approved by a Registered Dietitian

The nutritional needs of the individuals in our care are diverse due to differences in age, activity, physical condition, gender, religious preference and medical considerations. Meals, regardless of type, (i.e., regular, medical, holiday or religious meals), are provided at no cost to everyone in our care. All GEO facilities provide three nutritionally balanced meals daily with a minimum of 2,800 calories for males and 2,400 calories for females. The standard menu cycle for a GEO facility is 35 days. Menus at GEO facilities are certified by a Registered Dietitian (RD) and reviewed annually at a minimum thereafter.

Our menus also undergo a complete nutritional analysis to ensure they meet U.S. Recommended

Daily Allowances (RDA)/Dietary Reference Intake (DRI) guidelines at least yearly. These guidelines are set by the Food and Nutrition Board of the Institute of Medicine; National Academies.

Facility ServSafe Training Certifications for All Food Service Staff

GEO Food Service staff are trained in sanitation, proper food handling and storage by ServSafe, a food and beverage safety training and certificate program administered by the National Restaurant Association, in addition to any locally required certifications to ensure the safety of the meals provided. GEO Food Service Managers are required to obtain the dual Instructor/Proctor ServSafe certification.

GEO Food Service Managers and Production Managers also receive ServSafe Managers and Allergens certifications. All other GEO Food Service staff are required to have the ServSafe Food Handlers certification. Certifications must be obtained within 30 days of hire.

GEO Food Services Staff at Broward Transitional Center



Dining at Karnes County Residential Center



Human Rights & ESG Report

• ACCESS TO RECREATIONAL AMENITIES

We respect the right of everyone in our care to maintain good health through participation in suitable recreational activities. Recreational amenities and activities can serve not only to enhance physical and mental health, but also help to establish healthy interactions and social connections.

Our facilities provide individuals with a variety of indoor and outdoor recreation activities. Enhanced individual and group recreation and wellness plans supplement traditional forms of recreation and allow case managers the ability to conduct continuous assessments of recreational interests and needs.

We provide gender and age responsive outdoor and indoor activities that promote life balance and recognize cultural diversity. Indoor activities and tournaments are available daily. Hobby craft programs provide opportunities to pursue artistic interests. Outdoor recreation activities include soccer on artificial turf fields, softball, basketball, and flag football.

Housing units in our facilities are equipped with large, flat-screen televisions to provide entertainment. In addition, many of the television sets are equipped with individual tuner-capability through headsets. This technology enables several TV screens to be tuned to different channels simultaneously, thereby allowing for choice in programming that can be watched without distracting others in the same housing unit or day room.

Outdoor recreation activities include soccer on artificial turf fields, softball, basketball, and flag football.



Billiards at GEO's Broward Transitional Center



Music Room at GEO's Big Spring Correctional Center



Sand Volleyball at GEO's Broward Transitional Center

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Human Rights & ESG Report

• ACCESS TO REHABILITATION PROGRAMS FOR STATE INMATES

GEO is a world leader in the provision of enhanced offender rehabilitation programs and post-release support services through the GEO Continuum of Care® (CoC).

Several years ago, GEO undertook an assessment of the company's client objectives, organizational resources, financial strengths, and reached the conclusion that we could do more for the people under our care.

We noted that we were organizationally and financially successful in providing secure residential care in GEO secure facilities for over a quarter of a million individuals annually. We decided there was more that we could do, and should do. Out of this self-assessment came the GEO Continuum of Care® (CoC) enhanced offender rehabilitation program.

What started as an innovative concept a few years ago was implemented at 18 GEO facilities in the United States and Australia as of 2018.

During 2019, we are expanding the CoC Program to include 20 facilities, and will further expand it in 2020 to include 23 facilities, comprising all state correctional facilities under GEO's management.

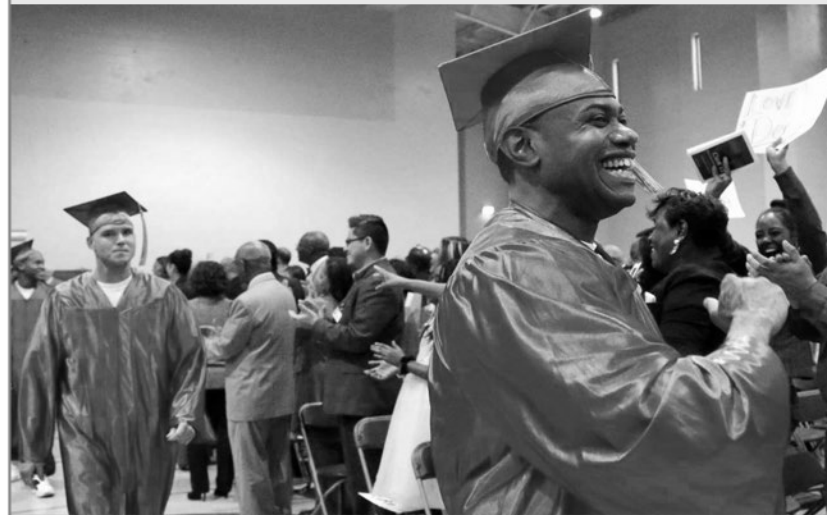
For 2019, GEO has committed \$10 million in funding for the GEO Continuum of Care® (CoC) Program.

The CoC Division at the Boca Raton, Florida Corporate Headquarters involves approximately 50 subject matter experts in offender rehabilitation, education, cognitive behavioral treatment, substance abuse treatment, case manager training, program quality assurance, and post-release services.

Our GEO Continuum of Care® provides enhanced in-prison offender rehabilitation programs including evidence-based treatment, integrated with post-release support services. GEO aspires to be the world leader in offender rehabilitation. The goal of our in-custody programming is to facilitate a successful transition by our participants into a crime-free daily life in their communities.

Our evidence-based treatment for state inmates begins with individualized risks and needs assessments and offers several unique and enhanced programs, including:

- Enhanced academic programming with the use of SMARTBoard technology for interactive learning in every classroom.
- Enhanced vocational training through nationally certified programs focused on future job and career opportunities.
- Industry-leading Cognitive Behavioral and Substance Abuse treatment based on nationally recognized curricula.
- Post-release support services, which involve post-release case managers and 24-hour support to assist offenders with the most crucial needs upon their release back into the community, including housing, employment, and transportation assistance.



Graduation Ceremony at
Graceville Correctional & Rehabilitation Facility



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Classroom at GEO's Big Spring Correctional Center

2018 GEO CONTINUUM OF CARE® (COC) HIGHLIGHTS

POPULATION

64,620	Total Eligible Population
31,049	Total Program Participants

PARTICIPATION

6,733,045	Total Programming Hours Completed
44,518	Total Programming Completions
32,419	Behavioral Program Completions
16,409	Individual Cognitive Behavioral Treatment Sessions Completed
32,283	Average Daily Vocational Attendance
13,104	Average Daily Academics Attendance
17,965	Average Daily Substance Abuse Attendance
8,842	Total Substance Abuse Completions
9,131	Total Vocational Completions
2,779	Total High School Equivalencies Issued
216.8	Average Program Participation Hours per Participant

POST-RELEASE SUPPORT SERVICES SUMMARY

1,864	Total Post-Release Participants
631	Community-Based Participants
749	Participants Pending Release
900	Employed/Students

STAFF DEVELOPMENT

334	Total Annual Trainings
80,170	Total Staff Training Hours

Human Rights & ESG Report

GEO is very supportive of the First Step Act of 2018 which recently became federal law. The legislation's efforts to implement recidivism reduction strategies are fully aligned with our mission to provide enhanced, evidence-based rehabilitation programs, integrated with post-release support services, which help the men and women in our care successfully reintegrate into their communities.

GEO is at the forefront of developing partnerships with government agencies across the United States and overseas to develop innovative and effective rehabilitation programs. The GEO CoC model integrates enhanced in-custody rehabilitation programs including cognitive behavioral treatment, with post-release support services to address the basic needs of released individuals, including transitional housing, clothing, food, transportation, and job placement assistance.

In recognition of the results it has achieved and its industry-leading practices, GEO received the American Correctional Association (ACA) 2018 "Innovation in Corrections" Award for the Graceville Correctional and Rehabilitation Facility in Florida. To date, the CoC Program at Graceville has reduced "returns to prison" in excess of 30% when compared to a similar time frame prior to the implementation of these enhanced programming efforts.

Every day, more than 30,000 men and women in our facilities participate in evidence-based, in-custody rehabilitation programs ranging from academic and vocational classes to life skills and treatment programs.

Additionally, through our network of community reentry facilities in the United States, over 15,000 individuals on a daily basis participate in programs aimed at helping them successfully reintegrate into their communities.

These industry-leading efforts underscore our continued belief, that as a company, we are most effective, when those we care for, re-enter society as productive and employable citizens.

PROGRAMMING OPPORTUNITIES AT GEO ICE PROCESSING CENTERS

Although the CoC Rehabilitation Programs are not applicable to ICE Processing Centers, GEO does offer programming opportunities at these locations to reduce idleness and teach life skills to the residents. The programming opportunities include:

- voluntary work programs with work skills and safety training,
- faith-based programs,
- hobby crafts, and
- correspondence programs.

Barber Shop at GEO's Broward Transitional Center



III. GEO CONTRACT COMPLIANCE PROGRAM, GEO REMEDIES TO SHORTCOMINGS IN HUMAN RIGHTS PERFORMANCE, AND INDEPENDENT VERIFICATION OF GEO PERFORMANCE BY THIRD PARTY ORGANIZATIONS

GEO CONTRACT COMPLIANCE PROGRAM

GEO has an independent Corporate Contract Compliance Division that provides the overall direction and oversight of compliance for the entire company's operations and reports directly to the Chief Executive Officer (CEO). As detailed below, the Contract Compliance Division performs audits of GEO facilities, and the key components of GEO's commitment to human rights.

The GEO Contract Compliance Division is located in the Boca Raton, Florida Corporate Offices. It is led by an Executive Vice President with over 20 years of legal and law enforcement experience. He is supported by 41 subject matter experts in security, medical, American Correctional Association (ACA) accreditation, PREA, Joint Commission, National Commission on Correctional Health Care (NCCHC), Performance-Based National Detention Standards (PBNDS), Federal Performance-Based Detention Standards (FPBDS), and multiple agency standards. Contract Compliance personnel are located at the Corporate Office, each Regional Office, and on-site at all major facilities. The Contract Compliance Division provides ongoing compliance oversight with in-depth reviews and audits conducted monthly, quarterly, and annually.

The Division operates as an independent, headquarters-based monitoring team that is responsible for, and committed to, implementing the Quality Control Program throughout GEO's operational business units: GEO Secure Services and GEO Care. GEO's contract compliance and Quality Control Program is embedded throughout the entire operation with corporate, regional, and facility support staff having roles in oversight and reviews.

GEO has developed a comprehensive Quality Control Plan (QCP), that is reviewed and approved by U.S. Immigration and Customs Enforcement (ICE) for each contract location. These plans ensure operations follow 2011 Performance Based National Detention Standards (PBNDS), including the 2016 revisions, court orders, American Correctional Association (ACA) standards, National Commission on Correctional Health Care (NCCHC) standards, and specific customer and corporate policies.

GEO conducts audits to verify that ICE's detention standard requirements, including the 2016 revisions, and other contract criteria are consistently being met, and to identify opportunities to exceed these requirements.

We operate each of our facilities in compliance with governmental standards, national accreditation and certification guidelines, and the requirements of our government customers. Details of our Quality Control Program are posted on the GEO website at: www.geogroup.com/exceeding_quality_compliance

GEO's commitment to human rights and the effective implementation of its global human rights policy is reinforced by the firm's Quality Control Program, which includes systematic monitoring, facility audits, program reviews, and the development of corrective action plans.

The purpose of our Quality Control Program is to improve operational performance and compliance with our policies, customer contracts, and applicable standards. Implementation is the responsibility of our Contract Compliance Division, which is independent of all the company's other business areas.

INCLUSION OF HUMAN RIGHTS IN COMPLIANCE PROGRAM

The application of quality control measures to all aspects of our operations includes processes to identify human rights risks and implement related remediation. Notably, the Quality Control Program identifies audit requirements, audit processes, reporting requirements, training components, and guidelines for American Correctional Association (ACA) accreditation, Prison Rape Elimination Act (PREA) compliance and certification, and, for ICE facilities, Performance Based National Detention Standards (PBNDS).

Each GEO facility undergoes numerous audit reviews, including an annual GEO corporate audit, government customer audits, and third-party inspections.

GEO Secure Services – U.S. Audit Activity: 2016 - 2018

	2018	2017	2016
<i>Total Active U.S. Secure Facilities</i>	63	63	60
<i>Internal GEO Contract Compliance Audits Completed</i>	142	123	136
<i>Government Customer Audits Completed</i>	69	96	81
<i>Third-party Inspections Completed</i>	47	44	38

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GEO CONTRACT COMPLIANCE PROGRAM

GEO corporate audits cover a one-year period between the last and the current audit dates. Internal audits are conducted by facility staff on a pre-determined frequency. Follow-up audits - which are completed by our Contract Compliance department - focus on non-compliant findings and advised items from the prior year corporate audit, internal facility audits, and any customer concerns. Further, Contract Compliance conducts ad hoc audits when needed to address any concern identified in intervening customer audits, and/or internal audits.

During an audit, all non-compliant findings, observations, and impressions are captured and placed into GEO's compliance database. Audit teams are chaired by Contract Compliance directors or managers with team members selected by the audit chair and approved by the appropriate Contract Compliance director. Team members are Contract Compliance department staff and/or subject matter experts from our facilities and/or corporate office.

GEO Audit Category	Human Rights Related Questions
<i>Food Service</i>	7
<i>Physical Plant</i>	2
<i>PREA</i>	59
<i>Admission, Orientation</i>	1
<i>Law Library/Courts</i>	3
<i>Mail/Visitation/Telephone</i>	4
<i>Library</i>	1
<i>Discipline</i>	2
<i>Work Programs</i>	2
<i>Religious Programs</i>	8
<i>Substance Abuse Program</i>	2
<i>Sanitation</i>	8
<i>Safety</i>	2
<i>Emergency Preparedness</i>	1
<i>Accountability</i>	1
<i>Restricted Housing Units (RHU)</i>	7
<i>Searches/Security Inspections</i>	6
<i>Use of Force</i>	4
TOTAL	120

GEO's Contract Compliance audit tools are used to review every aspect of a facility's operations, including facility safety, staff training, and other key factors. Human rights related questions are answered in several categories during each facility's annual corporate audit. These questions currently make up 21 percent of the total number of questions posed during an annual corporate audit and include one or more questions in 18 separate categories.

A key element of our Quality Control Program involves training the quality assurance staff at each GEO facility on the Quality Control Program, audit practices and processes, the electronic database, ACA standards and accreditation, and PREA requirements and certification. This training is conducted on-site and remotely to update facility staff on new requirements and standards, address deficiencies, and respond to requests from facility staff.

GEO REMEDIES TO SHORTCOMINGS IN HUMAN RIGHTS PERFORMANCE

During an audit, all non-compliant findings, observations, and impressions are captured and placed into GEO's compliance database. A post-audit workshop is conducted at the conclusion of every annual corporate audit to ensure non-compliant findings are well understood and positioned for immediate corrective action. The workshop consists of meetings to focus on non-compliant items and to ensure the facility's leadership has a clear understanding of the audit results. Time-sensitive corrective action plans are drafted during the workshop to bring non-compliant items into compliance.

Benefits of the workshop include:

- Continuing the audit momentum to focus on the non-compliant findings and create "buy in" for grass-roots solutions that can be implemented quickly;
- the local compliance staff have the attention and support of facility leadership to focus other department heads to create corrective actions that address the "root cause" of the non-compliant findings;
- ownership on every level to address any findings, with the workshop creating a forum for discussion of complex or recurring issues;
- the facility receiving the benefit of Contract Compliance expertise, perspective, and sharing of best practices from other facilities.

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Human Rights & ESG Report

Corrective action plans are drafted with a focus on the problem, the details of the non-compliant results, an identification of remedial strategy, and a clear plan regarding how each area of non-compliance can be remedied. Each corrective action plan is assigned to a specific department at the facility to ensure accountability.

Following the audit, an executive summary, including auditor observations and impressions, as well as, the audit's findings are prepared by Contract Compliance staff and distributed to facility administrators, regional offices, and GEO Corporate leadership. Additionally, monthly department reports are compiled summarizing the previous month's activity and noteworthy occurrences, and these reports are distributed broadly to GEO senior leadership.

A critical element to GEO's quality control program is the follow-up audit. These audits are conducted to specifically review Non-Compliant and Advised Items from the last Annual Corporate Audit, internal facility audits and every non-compliant finding from client audits contained on the Contract Compliance Division's Client Concerns Log.

INDEPENDENT VERIFICATION OF GEO PERFORMANCE

Contracted facilities operate with significant levels of accountability and transparency.

Unlike government-run facilities, contracted facilities provide greater accountability because they are governed by detailed operating contracts and often have on-site, full-time government contract monitors who are employed to oversee the daily compliance of the contract requirements.

We recognize that oversight is an important part of the process that holds us accountable as a services provider, and verifies our efforts to protect the health, safety, and rights of persons entrusted to our care.

In addition to our comprehensive Contract Compliance quality control program auditing of human rights, all of our clients take an active role with oversight and auditing of our physical plants and service provisions.

States

State clients have monitors (in most cases onsite) assigned to each facility housing inmates, to oversee daily operations and quality of services delivered. Most states conduct

at least one comprehensive annual audit that may focus on all facets of a facility or specific disciplines.

U.S. Immigration and Customs Enforcement (ICE)

ICE Processing Centers have full-time, onsite contract compliance monitors. ICE also has a structured Quality Assurance Surveillance Plan that includes audits by ICE's Enforcement and Removal Operations and ICE OPR's Office of Detention Oversight. ICE uses subcontractors to perform an annual assessment using the Performance-Based National Detention Standards (PBNDS). Additionally, in many locations, ICE has stationed law enforcement and mission support personnel in office space that is adjacent to office space utilized by GEO staff.

The PBNDS reflect ICE's continuing efforts to create an environment for immigration detainees that reflects the unique purpose of immigration detention. The Performance-Based Standards were developed under the Obama-Biden Administration with the objective of improving the medical and mental health services, increasing access to legal services and religious opportunities, improving communication with detainees with limited English proficiency, improving the process for reporting and responding to complaints, and increasing recreation and visitation.

In 2016, ICE revised a number of the detention standards to ensure consistency with federal legal and regulatory requirements, as well as, prior ICE policies and policy statements. The detention standards located on ICE's website <https://www.ice.gov/detention-standards/2011> represent the updated version of the standards.



Contract Compliance staff at the
2019 ACA Conference

U.S Department of Homeland Security (DHS)

DHS also conducts audits at detention facilities to review conditions of confinement and provisions for detainee rights. These audits are performed by representatives from the DHS Office of Civil Rights and Civil Liberties and the DHS Office of the Inspector General.

United States Marshals Service (USMS)

United States Marshals Service (USMS) conducts an annual Quality Assurance Review (QAR) at facilities with detainees under their jurisdiction. The QAR examines all aspects of services utilizing the Federal Performance-Based Detention Standards (FPBDS) to measure performance on an annual basis. USMS has assigned monitors to observe and review contract compliance.

The USMS modeled its Federal Performance-Based Detention Standards on the American Correctional Association Standards. The USMS Prisoner Operations Division and district offices use these standards to review non-federal facilities that house USMS detainees. The standards are designed to confirm that the facilities are “safe, humane, and protect detainees statutory and constitutional rights.”

Federal Bureau of Prisons (BOP)

Federal Bureau of Prisons (BOP) has full-time onsite monitors to oversee daily operations and contract service provisions. BOP conducts an annual Contract Facility Monitoring audit at each facility housing inmates under their jurisdiction as part of their Quality Assurance Program to assess contract performance. Compliance with BOP’s “Program Statements” is also a critical part of GEO’s auditing process. The BOP requirements are carefully detailed in its program statements and GEO works to meet each applicable standard.

OTHER AGENCIES AND ORGANIZATIONS

In addition to contract oversight by each client, our facilities are subject to audits by both federal agencies and independent, third-party organizations. GEO facilities are subject to oversight by the Department of Homeland Security (DHS), DHS Office of Civil Rights and Civil Liberties, and Department of Justice Office of Inspector General (DOJ-OIG). The DOJ-OIG conducts audits at facilities that house both USMS detainees and BOP inmates.

Additionally, GEO facilities have oversight from state and local organizations that review food service operations for safety and sanitation, fire safety, and emergency preparedness.

NATIONAL ORGANIZATIONS AND STANDARDS

GEO subscribes to operational standards promulgated by a number of certifying organizations and opens its facilities to inspection and accreditation by these associations, commissions, and councils. Accreditation serves as an additional level of quality assurance as well as providing an independent third-party professional assessment of operational performance.



U.S. Immigration
and Customs
Enforcement

ACA Accreditation

We have been an active participant of the American Correctional Association (ACA) since our company's founding. Through its independent accreditation process, ACA encourages best practices in the management and operation of correctional/rehabilitation facilities and processing facilities.

What are ACA's Standards?

Since their inception, the ACA standards have served to establish a fundamental operational structure for facilities and agencies that have implemented them. ACA standards interface with all aspects of operations, including safety, security, order, care, programs, justice, and administration, among others. While ACA standards provide guidelines for these areas and require the existence of some specific practices or conditions, they are designed to facilitate the development of

independent agency policy and procedure that govern the agency's everyday operations. Since the mid-2000s, ACA standards have gradually migrated to a "performance-based" model in which agencies collect, track, and analyze internal outcomes related to each standard in order to gauge their performance and adjust their operations accordingly. This model has proven to be a successful method of improving agency operations through the use of real-time data with an immediate and significant impact on inmates, staff, and administrators throughout the facility or agency.

ACA standards guide operations in every area of the facility or agency. Secure facilities such as jails and prisons must operate effectively as self-contained communities in which all necessary goods and services are provided in a safe, secure, and controlled manner. ACA standards relating to safety require adherence to all federal, state, and local fire and safety codes; emergency planning and preparation; and the provision of related training and materials for staff and inmates. Security standards mandate inspections and training of all firearms and armed officers; visitor and staff searches and tracking procedures; and inmate counting and tracking procedures. Other sections throughout each manual regulate policy, procedure, and practice at a similar level for other institutional or facility activities. (Source: ACA)

As a matter of policy, all GEO facilities are designed and operated in general accordance with the guidelines of one or more of the following organizations:

- American Correctional Association (ACA)
- Prison Rape Elimination Act (PREA)
- National Commission on Correctional Health Care (NCCHC)
- The Joint Commission (TJC)
- International Organization for Standardization (ISO)
- Australian Council of Health Care Standards (ACHS)
- Southern Association of Colleges and Schools (SACS)
- Correctional Education Association (CEA)
- U.S. Immigration and Customs Enforcement (ICE), Performance-Based National Detention Standards (PBNDs)
- United States Marshals Service (USMS), Federal Performance-Based Detention Standards (FPBDS)



We are committed to achieving ACA accreditation at all secure GEO facilities. This third-party accrediting body is intended to independently confirm that GEO's facility operations adhere to clear, recognized professional standards relevant to all design and operational areas of both residential and non-residential facilities, including safety, security, order, care, programs, justice, and administration. We facilitate the accreditation process by sending a Contract Compliance Director, ACA Director and Contract Compliance Manager to:

- assist facility staff in the preparation of preliminary documents for submission to ACA and provide training to executive staff and department heads;
- conduct a walkthrough to determine physical operational issues related to ACA standards;
- provide technical assistance in preparation of ACA files and ACA standard interpretation(s);
- send ACA Preparedness Survey to the facility four months prior to an ACA mock audit to collect information to assist the facility and for status checks on ACA file preparation and completion;
- conduct an ACA mock audit;
- be involved in the review and submission of the annual certification reports to ACA;
- attend the Facility's ACA audit; and
- organize panel hearing presentations and assist during hearings.

As a result of this preparation, 68 GEO facilities have achieved an average accreditation score of 99.6%. ACA scores for GEO facilities can be found on GEO's website at www.geogroup.com/Industry_leading_Standards

99.6% Average ACA Accreditation Score

PREA COMPLIANCE AND CERTIFICATION

GEO mandates zero tolerance towards all forms of sexual abuse and sexual harassment in our facilities and has developed a strong compliance process for facilities that fall within the scope of the Prison Rape Elimination Act of 2003 (PREA).

The majority of GEO facilities fall under either Section 28 C.F.R. Part 115 of the Department of Justice's (DOJ) Prison Rape Elimination Act National Standards or 6 C.F.R. Part 115 of the U.S. Department of Homeland Security's (DHS) Standards to Prevent, Detect and Respond to Sexual Abuse and Assault in Confinement Facilities.

GEO's PREA policy is available for public inspection on the company's website at: <http://www.geogroup.com/PREA>.

GEO has a dedicated PREA Coordinator, Director of Contract Compliance, reporting through the Corporate Contract Compliance Division. This Director oversees the implementation of PREA monitoring systems and policies for GEO facilities. GEO's PREA Director and individual Contract Compliance Managers:

- develop policies and procedures relating to and implementing PREA standards and compliant investigative practices;
- provide resources and guidance on PREA issues;
- coordinate and direct the certification process, including facility preparation and pre-audit preparation file review;
- review investigative files and practices;
- collect data and prepare reports as required;
- develop PREA-specific audit tool questions for internal and annual auditing;
- prepare each facility for certification review; and
- assist in investigations of PREA incidents and conduct mock audits.

Currently, GEO has 108 facilities certified under either the Department of Justice's or Department of Homeland Security's PREA regulations.

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National Commission on Correctional Health Care (NCCHC) Accreditation

The NCCHC is a national, non-profit organization originally established by the American Medical Association to develop and promote national standards of healthcare in correctional and detention settings. Although GEO facilities comply with ACA healthcare standards, many GEO facilities also obtain NCCHC accreditation at the request of the client. The NCCHC conducts audits of detention and correctional facilities every three years.

Currently, GEO has 15 secure facilities accredited by the NCCHC, including 10 immigration processing centers for which GEO provides healthcare services.

The Joint Commission Accreditation

For those GEO facilities that house Federal inmates on behalf of the Bureau of Prisons (BOP), GEO obtains healthcare accreditation under The Joint Commission. An independent, not-for-profit organization, The Joint Commission accredits and certifies nearly 21,000 health care organizations and programs in the United States. This organization offers accreditation to a variety of organizations including hospitals, medical practices, out-patient surgery centers, residential facilities, and behavioral treatment facilities. The Joint Commission conducts audits of detention and correctional facilities every three years.

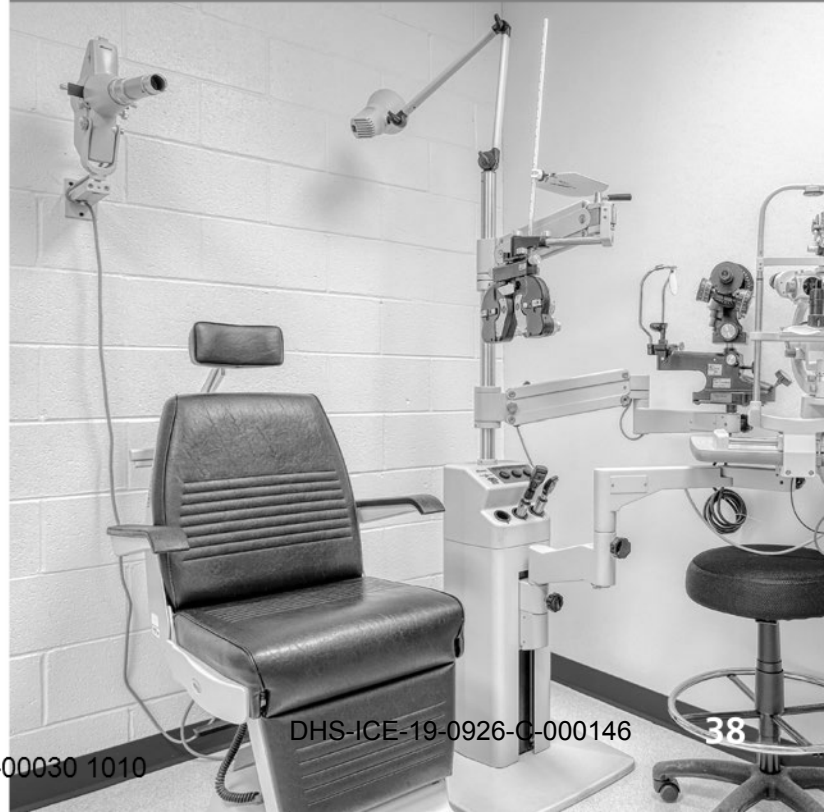
All of our GEO BOP facilities are accredited by The Joint Commission.



LaSalle ICE Processing Center Dental Services



Moshannon Valley Correctional Center Optometry



**CREATING
OPPORTUNITIES:
DEVELOPING
OUR PEOPLE**



**Continuum of Care
Conference**



GEO is an equal opportunity employer focused on the rich diversity of our workforce with zero tolerance for all forms of workplace discrimination and sexual harassment.

Today, women comprise an equal portion of GEO's U.S. workforce and play a significant role in our leadership and management. **Of GEO's 18,427 U.S. employees, 50% are female.** Women account for 58% of our corporate employees, 41% of our U.S. security staff, and 31% of those serving in management positions as directors or above. GEO continues to recruit women to our workforce, with women comprising 53% of new hires in 2018.

Women are also involved at the highest levels of our organization. Of the seven members on GEO's Board of Directors in 2019, two are women. In 2018, the organization 2020 Women on Boards recognized GEO as a Winning Company for its commitment to board diversity. Winning Companies champion board diversity by having 20% or more of their board seats held by women. This marks the fourth consecutive year in which GEO has been recognized by 2020 Women on Boards, whose goal is to increase the percentage of women on all corporate boards to 20 percent by 2020.

In all areas of our business, GEO has strived to achieve wider racial and ethnic diversity. In 2018, two of our board seats were held by members of minority communities. Across our organization, under-represented minorities of the United States of America -- including African Americans, Hispanic and Latino, Asian, Pacific Islander, Native Hawaiian and Native American/Alaskan -- currently account for 60% of our total U.S. employees.

Minorities comprise 38% of GEO's corporate workforce in the U.S., 68% of our U.S. security staff, and 28% of those serving in management positions as directors or above.

GEO Group's employee population is also diverse in age. Of new hires in 2018, 37% were under age 30, nearly half (49%) were between ages 30 and 50, and 27% were age 50 and older.



50%

of GEO's
18,427 U.S.
Employees
are female.

Human Rights & ESG Report

EMPLOYEE DIVERSITY

U.S. Based Employees	2018	2017	2016
Total of all GEO's U.S. Employees	18,427	18,044	15,925
% of all U.S. Employees - Women	50%	49%	47%
% of all U.S. Employees - Minorities*	60%	60%	58%
% of Board of Directors - Women	33%	33%	33%
% of Board of Directors - Minorities	33%	33%	33%
% of Management Positions - Directors or Above - Women	31%	27%	24%
% of Management Positions - Directors or Above - Minorities	28%	28%	24%
% of Corporate Employees - Women	58%	57%	59%
% of Corporate Employees - Minorities	38%	38%	35%
% of All GEO Security Staff-U.S. (includes Transportation) - Women	41%	39%	40%
% of All GEO Security Staff-U.S. (includes Transportation) - Minorities	68%	66%	64%
% of all U.S. Employees - Veterans	10%	10%	12%

NEW HIRES

% of New Hires - Under Age of 30	37%	38%	37%
% of New Hires - Age 30-50	49%	48%	50%
% of New Hires - Over Age 50	27%	30%	17%
% of New Hires - Women	53%	52%	48%

*] Includes Hispanic/Latino, Black/African American, American Indian/Alaska Native, Native Hawaiian/Pacific Islander, Asian, and two or more races.

RECRUITING U.S. MILITARY VETERANS

We are honored by the fact that many veterans of U.S. military service have made careers at GEO and contributed significantly to the company's success.

Historically, we have focused part of our national recruitment strategy on hiring veterans and those currently serving in the U.S. military reserves. In each of the past five years, GEO has been recognized by U.S. Veterans Magazine among its "Top Veteran Friendly Companies." Nearly 1,900 U.S. military veterans currently work at GEO, accounting for 10 percent of the company's U.S. employees.

More information regarding GEO's hiring practices and commitment to workforce diversity can be found on our website at: www.geogroup.com/embracing_diversity_inclusion

COMPENSATION AND BENEFITS

GEO offers a comprehensive employee benefits program that is competitive in each of the geographic regions in which we operate across the United States.

The variety of our benefit offerings is designed to provide individual employees with the flexibility to choose coverage options and benefits that best meet their needs and address their priorities. Although there may be some regional variation in different options, such as type of healthcare coverage available, GEO's employee benefits generally include the following:

- Paid time off
- Dental
- Medical and Prescription Drug coverage
- Vision
- Short- and Long-term Disability
- Employee Assistance Program
- Tuition Reimbursement
- Voluntary Accident Insurance
- Legal and Identity Theft Protection Plans
- Paid Holidays
- Basic, Additional, Spousal and Dependent Life Insurance
- Health and Dependent Care Flexible Spending Accounts
- 401(k) Retirement Plan
- Voluntary Whole Life Insurance
- Voluntary Critical Illness Insurance
- Employee Rewards and Recognition Programs

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Human Rights & ESG Report

EMPLOYEE TRAINING AND DEVELOPMENT

GEO has a robust training program for staff at all levels of the organization. Our training of managerial, administrative, and security staff is based on American Correctional Association (ACA) standards. The training program consists of a minimum of 120 hours within the staff member's first year of employment and 40 hours of recurring training in each consecutive year of employment.

The program includes classroom, practical exercises, course examinations, and on-the-job training. GEO's corporate policy mandates that every new employee receive orientation training prior to undertaking any assignments.

Training topics include but are not limited to:

- GEO's Commitment to Respecting Human Rights
- Core Correctional Practices
- Social and Cultural Awareness
- Understanding the Individuals in our Care
- Workplace Violence Prevention Program
- Suicide Awareness and Intervention
- Interpersonal Communication Skills
- Prison Rape Elimination Act Training
- Staff Professionalism and Ethics
- Facility Grievance Procedures
- Health Insurance Portability and Accountability Act (HIPAA)
- Telephone, Mail and Visiting Procedures
- Religious Opportunities
- Accountability and Security Procedures
- Life, Safety and Emergency Procedures
- Use of Force Regulations and Procedures
- Emergency Planning and Response Procedures
- Facility Disciplinary Procedures
- Search Procedures
- CPR, AED and Basic First Aid
- Report Writing
- Personal Protective Equipment
- Giving Direction
- Contingency Management
- Universal Precautions

Contractor and Volunteer Training

GEO has developed a training format designed to introduce all contractors and volunteers to our facilities and programs. This is a self-paced course that must be completed prior to beginning their

services. The course includes GEO's Commitment to Human Rights, Facility Rules and Regulations, Inmate/Resident Rights and Responsibilities, and Entry and Exit Procedures.

Continuum of Care Training Institute

The GEO Continuum of Care® Training Institute trains all staff from the time of hire and regularly throughout their employment. Our staff development plans include basic training, refresher training, advanced training, skillset certifications, and new manager's training.

Staff also receive training on contract-specific requirements, communication and de-escalation skills, self-defense, group facilitation, and our internal proprietary case management system. In addition, we provide training on Evidenced Based Practices, Motivational Interviewing techniques, Trauma Informed Care, and training specific to the types of programs offered to participants.

COC TRAINING AND EDUCATION

	2018	2017	2016
<i>Total Staff Training Hours:</i>	80,170	46,750	43,350
<i>CoC Total Annual Trainings:</i>	334	153	140

Online Learning Management System

To provide our employees with the most up-to-date training materials, online courses, and training reporting, we use an internal, online Learning Management System. This system is available to employees 24/7 and includes self-guided courses and reference materials for various topics.



Human Rights & ESG Report

LABOR UNIONS AND COLLECTIVE BARGAINING

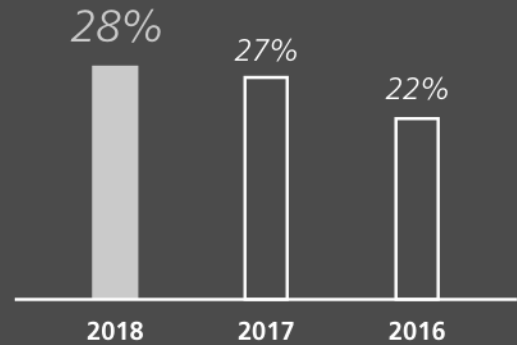
GEO welcomes the participation of labor unions in our facilities and respects the rights of individual employees to choose whether to join or not join labor organizations. In the U.S., employees in 41 of our facilities are represented by unions. At those locations, 5,267 GEO employees are represented by unions, which accounts for 69% of all employees at those locations. Across all of our U.S. operations, the unionized percentages are presented in the chart to the right.

We actively participate in the collective bargaining process, negotiate in good faith, and strive to maintain good working relationships with each of the unions representing our employees.

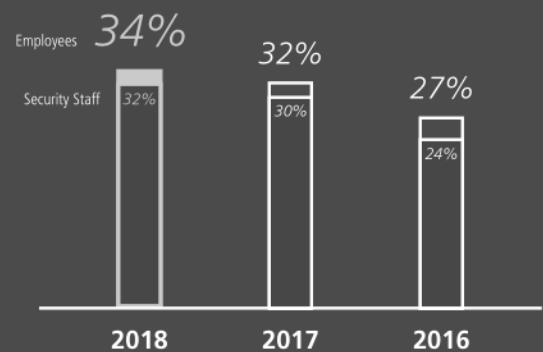
In the U.S., our employees participate in the following unions:

- International Association of Machinist & Aerospace Workers/National Federation of Federal Employees union (IAM/NFFE)
- United Government Security Officers of America (UGSOA)
- The International Union, Security, Police and Fire Professionals of America (SPFPA)
- International Association of Federal Employees
- International Brotherhood of Teamsters (IBT)
- Delaware County Prison Employees Independent Union (DCPEIU)
- National Union of Hospital and Health Care Employees, American Federation of State, County and Municipal Employees (NUHHCE/AFSCME) (1199J)
- American Federation of State, County and Municipal Employees (AFSCME in Illinois)
- Special and Superior Officers Benevolent Association (SSOBA)
- Communications Workers of America (CWA)
- Office and Professional Employees International Union (OPEIU)

UNIONIZED EMPLOYEES (2018-2016)



Total Number of all GEO Employees - U.S.



Total Number of GEO Secure Services Employees - U.S.

GEO welcomes the participation of labor unions in our facilities and respects the rights of individual employees to choose whether to join or not join labor organizations.

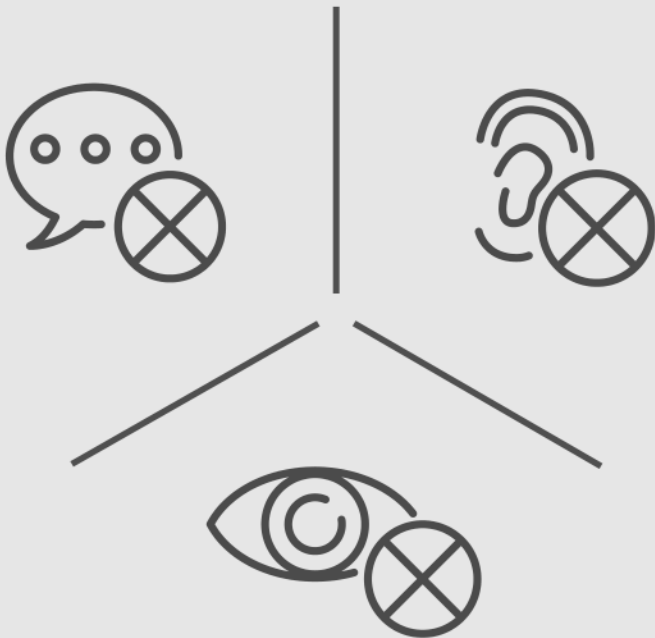


Human Rights & ESG Report

PROVIDING HIGHER EDUCATIONAL OPPORTUNITIES

GEO employees and their family members (parents, spouse and children) are eligible to further pursue their educational goals by receiving reduced tuition rates on a variety of accredited on-line degree programs in business, education, healthcare and other disciplines provided at 14 different higher educational institutions. Separately, GEO's subsidiary, BI Incorporated, offers an education assistance program to its full-time employees with at least one year of service.

We have a zero tolerance anti-discrimination and anti-sexual harassment policy

**AMERICANS WITH DISABILITIES ACT (ADA) COMPLIANT**

In 2018, more than 1,400 GEO employees in the U.S. utilized the FMLA.

COMPLIANCE WITH FEDERAL AND STATE EMPLOYMENT LAWS

In each of our operations throughout the U.S., GEO complies with all federal, state and local labor and employment laws and regulations. We have a zero tolerance anti-discrimination and anti-sexual harassment policy. This is covered as part of the training conducted with all our U.S. employees and includes instructions for multiple ways for individuals to report allegations.

We strictly enforce this policy, reinforce it in our employee communications, and maintain a process for promptly investigating allegations. We take action as appropriate, up to termination.

Throughout our organization, we recognize the needs of employees facing challenging life circumstances and respect their rights under the Federal Medical Leave Act (FMLA). In 2018, more than 1,400 GEO employees in the U.S. utilized the FMLA.

In addition, GEO engages in interactive processes to ensure that qualified individuals with disabilities under the Americans with Disabilities Act (ADA), as amended by the ADA Amendments Act, and all applicable state or local laws, are afforded reasonable accommodations for their disabilities.

GEO supports and complies with all applicable federal, state, and local laws and does not take any action against employees because they have exercised their rights under the law.

ENSURING SAFETY AND SECURITY



Throughout the United States, GEO oversees the operation and management of 127 secure facilities, processing centers, and community reentry facilities, as well as, 66 non-residential reentry programs. We currently employ 18,427 professionals in the U.S. and provide services to more than 250,000 individuals in our care on a daily basis.

The oversight of GEO's U.S. secure facilities is coordinated from three regional offices, located in Charlotte, North Carolina; San Antonio, Texas; and Los Angeles, California. Each regional office is headed by a Regional Vice President who oversees approximately two dozen experts in security, medical, finance, contract compliance, human resources, and other support services.

The oversight of our reentry centers, non-residential programs, community based case management, and electronic monitoring services is coordinated by several divisions within our GEO Care business unit: GEO Reentry Services, Abraxas Youth Services, and BI Incorporated.

GEO has a strong commitment to the health and safety of our employees and those in our care, as well as, contractors, medical providers and visitors at all of our facilities. Our responsibilities in these areas, along with those of our employees, are highlighted in section 7 of GEO's Code of Conduct.



Karnes County Residential Center

SECTION 7 - GEO'S CODE OF CONDUCT HEALTH AND SAFETY

GEO strives to provide each employee with a safe and healthy work environment. Each employee has responsibility for maintaining a safe and healthy workplace for all employees by following safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions.

Violence and threatening behavior are never permitted. Employees should report to work in the condition to perform their duties, free from the influence of illegal drugs or alcohol. The use of illegal drugs in the workplace will not be tolerated.



GEO is committed to the health and safety of our employees.

GEO'S EHS MANAGEMENT SYSTEM

Throughout our operations, GEO has implemented an Employee Health and Safety (EHS) Management System based on the concept of Integrated Safety Management.

As an established and recognized industry best practice, this comprehensive approach to safety encompasses core management functions, employee responsibility, engagement and communication between management and line staff, safe work methods, hazard analysis and controls, preventative and corrective measures based on investigations and root cause analysis, training programs, internal and external compliance audits and continuous improvement.

The overall management and direction of GEO's EHS program is led by GEO's Corporate Risk Management department, which includes professionals in occupational safety, workers compensation and casualty insurance, risk analytics, and environmental issues. Regional Safety Managers are embedded into our operations throughout the U.S. and provide hands-on support to individual facilities.

All facilities in the GEO Secure Services business unit employ a dedicated Fire & Safety Manager responsible for managing the EHS program locally. The Fire & Safety Managers are formally trained in multiple EHS disciplines, including the Occupational Safety and Health Administration (OSHA), National Fire Protection Association (NFPA) and Environmental Protection Agency (EPA), along with company and customer required practices.

In addition to organizational and management structure, the following are critical elements of GEO's ongoing EHS program:

Operational excellence: Our organization strives to achieve sustained, high levels of operational performance. This involves a focus on operations, decision-making, open communication, and systematic approaches to eliminate events or situations that may jeopardize the safety and health of employees or individuals in our care.

Individual responsibility for workplace safety: Every employee accepts the responsibility for safe operational performance and is trained to be

mindful of work conditions that may impact safety. Employees are encouraged to challenge assumptions, investigate anomalies, and consider potential adverse consequences of planned operational actions.

Compliance oversight: Competent, robust, periodic, and independent oversight is an essential source of feedback that verifies safety performance expectations are met and identifies EHS gaps and opportunities for improvement. Performance assurance activities verify whether regulatory standards and internal governance requirements are being met. Internal processes, procedures, and physical spaces are evaluated daily, weekly, and monthly for workplace hazards and proper sanitation.

Communication and staff engagement: Frequent, clear and open communication is an essential component of GEO's EHS program. There are multiple formal and informal channels for communication to and from staff regarding the discovery and mitigation of potential hazards and corrective actions that involve all aspects of workplace safety – all without any fear or expectation of retaliation. At the same time, individuals in our care are encouraged to be active participants in each facility's safety initiative by reporting any issues that may contribute to hazards or injury.



Safety committees are active at each facility.

Safety committees are active at each facility. These committees are supported by corporate-based committees and meet monthly to conduct reviews of safety activities, policies and procedures, and safety-related incidents for root-cause analysis and appropriate corrective action plans.

The safety committees play an integral role in assisting the Fire & Safety Managers and facility management teams, in reducing injuries and hazards associated with facility operations. Safety committee membership typically includes a balance of line staff and senior management to ensure the full representation of all aspects of facility operations.

Human Rights & ESG Report

ONGOING EMPLOYEE TRAINING HELPS DRIVE SAFE PRACTICES

As described in other sections of the ESG Report as well as on our website, GEO provides a robust training program for staff at all levels. Among the many areas that are covered, specific training modules are in place to reinforce the company's policy to respect Human Rights and facilitate workplace safety.

Our training of managerial, administrative, and security staff is based on standards set by the American Correctional Association (ACA). GEO's corporate policy mandates that every new employee receive orientation training prior to undertaking any assignments. On an annual basis, GEO's Training Director reviews and revises the Training Plan to better accommodate employee needs.

GEO's internal Continuum of Care Training Institute trains all staff from the time of hire and regularly throughout their employment. GEO's staff development plans include basic training, refresher training, advanced training, skill set certifications, and new manager's training. Staff also receive training on contract-specific requirements, communication and de-escalation skills, self-defense, group facilitation, and our proprietary Case Management System.

In addition, GEO provides training on Evidenced-Based Practices, Motivational Interviewing techniques, and training specific to the types of programs offered to participants in our care.



Training program covers a range of topics and disciplines



Graceville Correctional and Rehabilitation Facility

ON-LINE LEARNING MANAGEMENT SYSTEM:

To provide our employees with the most up-to-date training materials, on-line courses, and training reporting, GEO utilizes an internal, on-line Learning Management System. This system is available to employees on a 24/7 basis and includes self-guided courses and reference materials for various topics.

Training topics include:

- GEO's Commitment to Human Rights
- Work Place Violence Prevention
- Prison Rape Elimination Act (PREA) Training
- Suicide Awareness and Intervention
- Use of Force Regulations and Procedures
- CPR, AED and Basic First Aid
- Emergency Planning and Response Procedures
- Respiratory Protection
- Hazardous Energy Control
- Fire Protection/Prevention

MAKING AN IMPACT: ADDRESSING RECIDIVISM



The GEO Continuum of Care® division -- an innovative and award-winning initiative we piloted in two state correctional facilities in 2015 -- now provides enhanced in-custody rehabilitation programming, including cognitive behavioral treatment, integrated with post-release support services at 18 state correctional facilities and two federal facilities in the U.S. as of 2019. We are expanding the program to 23 facilities operated by GEO by the end of 2020.

In addition, GEO's Reentry Services division supports correctional agencies across the country with flexible options, such as in-custody treatment, residential reentry centers, and day reporting programs.

Throughout the U.S., individuals released from correctional facilities can continue their course of treatment at GEO's residential facilities or non-residential day reporting centers to maximize the impact of programs delivered to reduce recidivism. GEO's residential reentry resources include 48

facilities with more than 11,000 beds. GEO also operates 66 non-residential day reporting centers.

GEO's day reporting centers provide on-site cognitive-behavioral treatment and services tailored to participants' specific criminogenic risks and needs. At these centers, participants receive a continuation of their care, including intensive treatment focused on changing criminal thinking and behavior. At the same time, they are connected with community resources to enable them to become contributing members of the local community.

On a combined basis, the GEO Continuum of Care® division and GEO's Reentry Services division provide meaningful programming to more than 30,000 participants, including behavioral therapies, academic skills development and remedial education, vocational training and certification programs, cognitive-behavioral and substance abuse treatment, and faith-based support services.

GEO has published reports on the results of the GEO Continuum of Care® program for each of the past three years.

The 2018 GEO Continuum of Care® Annual Report can be accessed using this link:

www.geogroup.com/Portals/0/CoC_Annual_Report_2018.pdf

GEO's 2019 annual funding commitment in support of the CoC program is approximately \$10 million, representing approximately 7% of GEO's net income.



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IN-CUSTODY REHABILITATION PROGRAMS: FACILITATING SUCCESSFUL TRANSITIONS BACK TO THE COMMUNITY

GEO's in-custody rehabilitation programs are tailored to the specific needs of each individual. They include:

- individual and group behavioral therapy activities,
- academic and remedial education,
- vocational skills training,
- substance abuse treatment, and
- a variety of faith-based services and support programs offered in conjunction with several partner religious organizations.

The GEO Continuum of Care® program demonstrates that individuals working with an assigned Transition Case Manager while in custody – within a year prior to their release – and then receiving assistance from a Post Release Case Manager, can achieve a reduction in recidivism.

For example, at the Graceville Correctional and Rehabilitation Facility in Florida, GEO implemented an intensive case management program to facilitate successful inmate transition to the community. Each individual within 12 months of release is matched with a highly-skilled case manager.

During bi-weekly, one-on-one cognitive behavioral treatment sessions, the pair work on lowering criminogenic needs and transition planning. Individuals are first assessed based on their risk index, or "Risk to Recidivate." Individual needs and goals are determined from the results of the assessment to develop their transition case plan.

EDUCATIONAL DEVELOPMENT AND ENRICHMENT



SMART Board Learning Classroom

At our GEO Continuum of Care® sites, individuals participate in an educational needs and opportunities assessment from which individual education plans are created based on learning style and needs. Progress is monitored continually and each plan is re-evaluated every 30 days.

To address the specialized and diverse educational needs of those in our care, GEO developed adult learning labs, which offer a combination of individual learning opportunities and technology-driven group interaction. Participants develop collaborative skills by working in teams at SMART Board stations to investigate, assess and respond to issues. Team members also build presentation skills.

GEO has also invested significantly in an extensive computer-based curriculum that meets individual learning styles. Academic subjects include math, science, social studies, language arts, and writing and computer skills. As part of the learning experience, core reasoning skills are integrated into each lesson.

Since 2014, our company has invested approximately \$1.6 million to equip more than 300 classrooms across our facilities with SMART Board Technology and added over 580 computer stations.

The adult learning labs help those in our care not only to strengthen academic skills, but also to work through anti-social criminal reasoning. As they work through the curriculum, participants begin to understand the importance of positive relationships and build on their achievements.

\$1.6M

invested to equip
more than 300
classrooms across
our facilities

GEO GROUP HIGH SCHOOL EQUIVALENCY DIPLOMAS AND VOCATIONAL CERTIFICATIONS: 2016 - 2018

	2018	2017	2016
GEO Continuum of Care Total Eligible Population	64,620	60,620	N/A
Total Program Participants	31,049	29,214	28,241
Total Programming Hours Completed	6,733,045	5,914,071	5,853,069
Total Programming Completions	44,518	30,814	24,274
Average Daily Vocational Attendance	32,283	24,291	24,330
Average Daily Academics Attendance	13,104	12,210	11,870
Total Vocational Completions	9,131	7,814	7,674
Total High School Equivalencies Issued	2,779	2,615	1,849
Average Program Participation Hours per Participant	216.8	202.5	207.25

Along with academic skills development, GEO provides a growing number of vocational training and certification programs. Many of these programs focus on high-growth industries or involve skill-sets that are in demand in communities where individuals will reside upon release. At present, the programs we offer encompass 16 different fields, including:

- Custodian Maintenance
- Barbering
- Horticulture
- Electrical
- Building Trades
- Auto Mechanics
- Upholstery
- Weaving
- Heating, Ventilation, and Air Conditioning (HVAC)
- Small Engine Repair
- Masonry
- Plumbing
- Culinary Arts
- Computer Repair
- Carpentry
- Welding

We're continually working to expand the vocational training and certification opportunities available to those in our care.

For example, GEO is in the process of collaborating with the International Association of Machinist & Aerospace Workers/National Federation of Federal Employees union (IAM/NFFE) to develop a pilot pre-apprenticeship program in Washington, D.C. to prepare individuals for Registered Apprenticeship programs.

FACILITATING TRANSITION: GEO'S POST-RELEASE SUPPORT SERVICES

Approximately 95 percent of all offenders return to their communities. GEO's Post-Release Support Services provide case management, develop and maintain community partnerships, and coordinate and distribute transitional resources based on individual need.

These measures are designed to reduce recidivism rates, as well as, to increase public safety, reduce victimization, and improve the quality of life for released individuals upon returning to their communities.

GEO's post-release support services include providing assistance for:

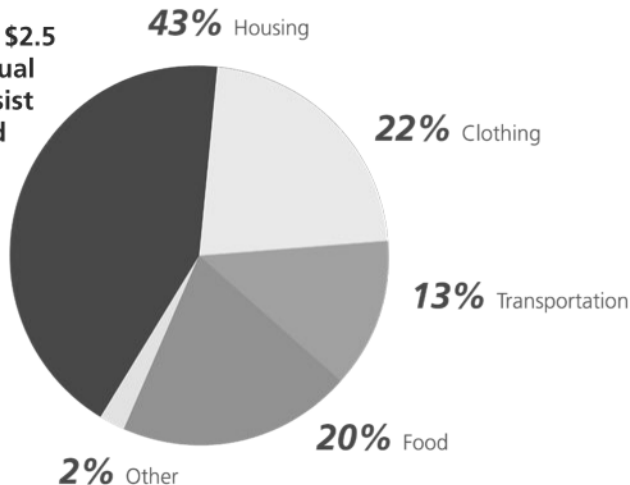
- Transitional housing
- Substance Abuse and Mental Health Treatment
- Vocational Training
- Transportation Assistance
- Family Reunification Opportunities
- Educational Classes
- Clothing and Food Vouchers
- Job Placement Assistance

Human Rights & ESG Report

As an extension of the GEO Continuum of Care® initiative in six states, GEO's post-release case managers coordinate and facilitate the delivery of resources through 162 preferred providers. Weekly calls are scheduled with post-release participants to assess progress and provide support for up to 12 months, as well as, motivate participants to continue in the behavioral change process.

In addition to its extended case management, education, training and related services, GEO allocates \$2.5 million in annual funding to assist those released from custody in obtaining such necessities as: housing (43%); clothing (22%); transportation (13%); food (20%); other (2%).

GEO allocates \$2.5 million in annual funding to assist those released from custody



DRUG AND ALCOHOL TREATMENT

A critical element of GEO's services – both for individuals in our care and those involved in our post-release programs – involves the treatment of substance abuse, including alcoholism and opioid addiction.

Individuals with drug and alcohol addiction problems are provided with substance abuse treatment programs, including counseling, monitoring, and drug testing. The program is designed to introduce and educate participants with regards to the physical, mental and emotional dangers associated with drugs and alcohol and to provide a means for breaking the cycle of substance abuse and addiction.

GEO Continuum of Care: Substance Abuse Treatment	2018	2017	2016
Average Daily Substance Abuse Treatment Attendance	17,965	14,112	12,554
Total Substance Abuse Treatment Completions	8,842	8,412	8,220

Individuals may be referred to these programs based on their court commitment papers, by request of the individual, or based on an assessment by GEO's classification and counseling staff. These programs include either group or individual counseling and substance abuse education.

FAITH-BASED INITIATIVES

GEO currently partners with approximately 38 faith-based organizations around the country. National organizations and local community churches provide 2,500 volunteers to serve the individuals in our care and provide faith-specific doctrinal teaching, conduct worship services, teach faith-based life-skills classes, provide pastoral visitation opportunities, offer spiritual guidance, and conduct special holiday/holy day events.

On average, 21,300 of those in our care attend chapel services each month throughout our facilities. We are undertaking efforts to bring additional special event programming to our facilities in order to achieve higher attendance.

Eleven dedicated faith and character based housing units across our facilities provide at least one year of intensive faith-based and character-based programming. Classes in these faith and character based housing units include anger management, victim impact, life mapping, and goal setting, as well as, courses on parenting skills, accountability, and purpose.

38 faith-based organizations partner with GEO

Human Rights & ESG Report

In addition, GEO has partnered with the University of the South West (USW) and The Urban Ministry Institute, which provide accredited classes to qualified participants. USW provides a full baccalaureate degree, and The Urban Ministry Institute provides 30 credits transferrable to nine fully accredited colleges around the country.

To aid reentry, GEO's faith-based services enlisted the support of various transportation companies to provide Commercial Driver's License (CDL) certification; small business associations to make available entrepreneurial mentors and workshops; and other faith groups that harness the funds and manpower of larger churches to provide post-release support.

For example, GEO's partnership with the Global Leadership Network has provided 2,000 residents, 111 staff, and 22 volunteers in the past two years with the insight and knowledge of the most successful leaders in business, politics, and religion by participating in a two-day live broadcast event. The program started with two GEO facilities in 2016 and will expand to 14 GEO facilities by the end of 2019.

GEO CONTINUUM OF CARE® INTERNAL CERTIFICATION

Each GEO Continuum of Care® program undergoes an internal certification process that begins 90 days after its implementation. The process involves the use of GEO's Quality Assurance System to monitor the delivery of services and maintain and enhance fidelity and integrity.

GEO program supervisors conduct monthly and quarterly internal audits of groups, case notes, and case files. GEO conducts annual facility evaluations and contract compliance reviews. GEO also contracts with subject matter experts to conduct a comprehensive program checklist and a detailed measurement of program alignment with evidence-based principles.

The assessments extend to every aspect of GEO Continuum of Care® operations, performance, staff instruction, education and treatment methodologies, communication, and program outcomes.



Blackwater River Correctional and
Rehabilitation Facility Dog Program

*By the end of
2020, 23 GEO
managed facilities
will be Continuum
of Care sites.*

ENGAGING WITH OUR STAKEHOLDERS



GEO's commitment to respect the human rights of all persons in our care, as well as to sustainability and continuous improvement in our operations, is exemplified by our ongoing communication and engagement efforts with a wide variety of our stakeholders.

GEO stakeholders include our employees and board members, customers, regulators, accrediting organizations, faith-based groups and NGOs, individuals in our care, unions and labor organizations, communities where we operate, and investors, banks and financial institutions.

Through regular meetings and discussions, webcasts and conference calls, as well as the steady flow of information provided in our reports, newsletters, and posted on our

website, we strive to educate our stakeholders on our operations, governance practices, the regulatory environment in which we operate, and our overall commitment to corporate social responsibility, sustainability and respecting the human rights of all persons in our care.

At the same time, we have been active participants in ongoing dialogues with all of our stakeholders and consider their input and feedback critical to our focus on achieving operational excellence, having a positive impact on individuals and our society, and meeting the standards for excellence in corporate citizenship.

An area of emphasis by GEO involves working with key stakeholders to help the company understand different perspectives on human rights topics in secure facilities, processing centers and community reentry programs, and to learn how GEO can improve its operations to fulfill the commitments contained in our Global Human Rights Policy.



Human Rights & ESG Report

FAITH-BASED ORGANIZATIONS

As part of our collaboration with key stakeholders, GEO partners with approximately 38 faith-based organizations around the country, including national organizations and local community churches. These organizations provide a wide range of worship, educational services and guidance to those in our care.

We have also partnered with the Global Leadership Summit, an annual two-day event telecast, which is held every August and reaches hundreds of locations in North America, engaging pioneering pastors and leaders from around the world who lecture about leadership, skill development and experiences that help local churches thrive.

We are proud of our partnership opportunities with faith-based groups in the communities where GEO operates facilities. We present a sampling of the comments of our partner organizations.



Catholic Charities, Diocese of Palm Beach Prison Ministry

"For many years the Office Prison Ministry in Catholic Charities, Diocese of Palm Beach, has been sending prison ministry volunteers to the South Bay Correctional Facilities to provide Catholic Christian Services...many people have benefitted from these weekly visits, including [GEO] officers who on occasion seek out the benefits of prayer as well.

"I attended the Appreciation Dinner at the South Bay facility...in 19 years of involvement in prison ministry, including 13 as director, no corrections facilities [have] ever come close to the reception that volunteers were offered that evening...thank you."

By Deacon Gregory C. Quinn, M.A.

Director of Prison Ministry



New Beginnings of Tampa

"I wanted to...thank you for our collaborative partnership with The GEO Group, and the great work being done through GEO's Continuum of Care. New Beginnings of Tampa has been providing transitional housing, rehabilitative services and job training/ placement for disadvantaged and vulnerable men and women for 20 years.

"We were given the opportunity to partner with The GEO Group in providing post-release support services as part of the Continuum of Care...the first thing we noticed was the passion and commitment of the GEO case managers...they go above and beyond when referring each client.

"We have never experienced this level of service and assistance when receiving referrals from traditional agencies in the criminal justice system...the clients from GEO arrive at our housing facility with a positive attitude and a focus on their goals."

By Thomas J. Safko

New Beginnings of Tampa, Inc., Tampa, Florida



God Behind Bars

"God Behind Bars is very blessed to be partnering with GEO Group...with GEO we have had the opportunity to co-labor inside several facilities to bring hope to several hundred inmates and their families through God Behind Bars' Weekly Experience, Small Groups, Pre-and Post-Release and Family Reconciliation programs.

"We are hoping that together we can reach hundreds more and have a working relationship that will last for several more years..."

By Raeanne Hance

Global Director of Corrections and Community Organizations

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THE GEO GROUP FOUNDATION

The GEO Group is committed to making a difference in the communities in which we operate. Every year, through our charitable arm, The GEO Group Foundation, GEO supports charities, schools, community organizations, and higher education scholarships for students across the country.

In 2018, GEO donated more than \$1.9 million to these initiatives, including more than \$700,000 in higher education scholarships, over \$444,000 for health and disabilities organizations, and \$175,000 to children's organizations in communities across the U.S.

COMMUNITY ENGAGEMENT

In addition to charitable giving, GEO's facilities play a unique active role in giving back to their community and their employees. We take great pride in the opportunities we make available to members of those communities, where we also engage those communities directly as a partner and a corporate citizen.

Our facilities hold quarterly Community Advisory Board meetings. Most of these boards include community leaders and key GEO facility staff. The meetings provide a forum for sharing information on current events at GEO facilities, as well as, to discuss the needs



of the communities, and to help expand the partnership opportunities between our facilities and local organizations.

An emphasis is also placed on increasing facility involvement in community affairs and services through employee volunteerism, fundraising, and participation in community events.

GEO FOUNDATION ANNUAL CHARITABLE GIVING (2016 – 2018)

	2018	2017	2016
<i>Higher Education Scholarships</i>	\$ 709,000	\$ 709,500	\$ 662,010
<i>Health & Disabilities Organizations</i>	444,620	579,375	481,680
<i>Children's Organizations</i>	175,002	311,146	200,680
<i>Local Schools & Education</i>	107,720	85,500	65,050
<i>Public Entities</i>	203,050	33,700	99,589
<i>Others</i>	267,250	523,985	365,133
<i>Total Donations</i>	\$1,906,642	\$2,243,706	\$1,874,140

COMMUNICATION OF HUMAN RIGHTS POLICY TO SUPPLIERS

GEO works with numerous vendors and suppliers of services and goods and recently began incorporating language requiring compliance with United Nations Guiding Principles on Human Rights in all of our contracts.

Through the years, we have strived to establish and build on relationships with numerous small disadvantaged, woman- and veteran-owned vendors across our U.S. operations. In 2018, the total value of our contracts with women-owned businesses exceeded \$36 million, while those with small disadvantaged businesses exceeded \$34 million. Our payments to veteran-owned business totaled more than \$11 million and our contracts with businesses owned by disabled veterans totaled over \$5 million.



SMALL AND DIVERSE VENDOR BREAKOUT:

Small and Diverse Vendor Breakout:	2018	2017	2016
<i>Woman Owned Business</i>	\$36,483,810	\$28,288,062	\$24,553,647
<i>Small Disadvantaged Business</i>	\$34,006,569	\$27,762,547	\$23,379,970
<i>Veteran Owned Business</i>	\$11,187,155	\$10,553,882	\$9,484,141
<i>Service Disabled Veteran Owned Business</i>	\$5,282,609	\$4,873,967	\$3,294,813

**DELIVERING ON
OUR PROMISE:
ETHICS AND
GOVERNANCE**



GEO's Corporate Code of Conduct and Ethics is built on a foundation of obeying the law, both in letter and spirit, and delineates the overarching principles that guide the organization and its employees in their day-to-day activities and interactions with key constituency groups.

Our Code of Conduct and Ethics strives to promote the following objectives:

- Honest and ethical conduct
- Ethical handling of actual or apparent conflicts of interest
- Full, fair, accurate, timely and understandable disclosure
- Compliance with applicable government and self-regulatory organization laws, rules and regulations
- Promote the protection of company assets
- Promote fair dealing practices
- Prompt internal reporting of Code violations
- Assuring accountability for compliance with the GEO Code of Conduct and Ethics

GEO's Code of Conduct and Ethics can be accessed on our website at:

https://www.geogroup.com/Portals/0/Code_of_Business_Conduct_and_Ethics.pdf

Specific sections of GEO's Code of Conduct and Ethics articulate the company's policies and guidelines with respect to compliance with anti-bribery and anti-corruption laws, government contracting, health and safety, conflicts of interest, accurate record-keeping, confidentiality, improper gifts, political contributions, anti-discrimination and anti-sexual harassment, reporting illegal and unethical behavior, as well as, senior leadership roles and responsibilities for meeting disclosure and accounting requirements set by the Securities and Exchange Commission.

ANTI-DISCRIMINATION AND ANTI-HARASSMENT

Section 6 of GEO's Code of Conduct and Ethics articulates the company's anti-discrimination and anti-sexual harassment policy:

"... We are firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment of any kind. Employment decisions must be based only on an employee's or applicant's qualifications, demonstrated skills and achievements without regard to race, color, sex, national origin, religion, age, disability, veteran status, citizenship, sexual orientation, gender identity or marital status.

Employees, officers, and directors must not engage in conduct that could be construed as sexual harassment. Unwelcome sexual advances, sexually suggestive statements or questions, offensive jokes, sexual innuendos, offensive touching or patting, requests for sexual favors, displaying or showing sexually suggestive material, and other verbal or physical conduct of a sexual nature may be forms of sexual harassment. You should report suspected instances of sexual harassment by anyone (including persons with whom GEO does business) immediately to your human resources contact."

Section 19 of GEO's Code of Business Conduct and Ethics establishes a "Special Code of Ethics for the CEO, Senior Financial Officers, and Other Employees."

This section also makes it incumbent on the part of any employee who identifies, learns of, or suspects a violation of proper and accurate disclosure to report this activity to GEO's General Counsel for investigation.

The standards and policies described in each section of GEO's Code of Conduct and Ethics are communicated widely throughout our organization and reinforced with each of our employees through rigorous and ongoing training.

At the time of hiring, all new GEO employees are provided a copy of GEO's Code of Conduct and Ethics, along with the GEO Employee Handbook, and are required to sign an acknowledgement form. Until 2018, all director level employees and above were also required to sign an acknowledgement form every year after their initial hiring. Starting in 2019, all GEO employees - including field, regional and corporate - will be required to read GEO's Code of Conduct and Ethics and sign an acknowledgement form annually.

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GEO'S BOARD OF DIRECTORS: INDEPENDENT, EXPERIENCED AND DIVERSE

GEO's Board of Directors is comprised predominantly of external directors. Of GEO's board members, only one, George C. Zoley, the company's Chairman, CEO and Founder, is an officer of the company.

The independent directors bring a wide range of complementary skills and experience that are relevant to our operations and give them the ability to provide valuable oversight and direction for our company. Specifically, our Board Members have extensive experience in law, government service, government contracting, finance, real estate, management, and international business.

GEO and its stakeholders and shareholders benefit in many ways from the deliberate diversity of our board: during 2018, two of the six directors were minorities and two were women.

BOARD OF DIRECTORS DIVERSITY

Board of Directors Diversity	2018	2017	2016
<i>Number of Board of Directors Members (As of Annual Shareholders Meeting)</i>	6	6	6
<i>Percentage of Underrepresented Minorities[*]</i>	33%	33%	33%
<i>Percentage of Women on the Board</i>	33%	33%	33%
<i>Percentage of Board Independence</i>	83%	83%	83%

[*] Includes Hispanic/Latino, Black/African American, American Indian/Alaska Native, Native Hawaiian/Pacific Islander, Asian, and two or more races.

Additional information on individual members of the GEO's Board of Directors is available on our company's website at: https://www.geogroup.com/board_of_directors

THE ROLE OF CONTRACT COMPLIANCE IN CORPORATE GOVERNANCE

GEO works extensively with various government agencies and entities, which exercise broad oversight of the operations, management, and daily activities at each of the facilities we manage on their behalf. Thus, compliance with the requirements set by these government entities is a critical component of GEO's overall governance, as well as, its ongoing success and sustainability.

Our Contract Compliance Division reports directly to our Chairman and CEO, and operates independently from all of our other business units and divisions. Among the department's responsibilities is the completion of annual audits of all of our operations and the oversight of any and all required corrective measures.

Further details on GEO's Contract Compliance division are provided in the ESG Report chapter titled: Meeting our Obligations: Oversight and Contract Compliance.

IMPORTANCE OF EMPLOYEE TRAINING

GEO employees undergo extensive training each year, including certifications associated with the performance of their individual job functions, as required by various federal, state, and local laws applicable to each jurisdiction in which we operate, and as stipulated under our company's government contracts.

In addition to instruction related to their individual job requirements and performance, all employees must participate in training regarding our company's policies related to human rights, anti-discrimination, anti-sexual harassment, ethics compliance, unethical or illegal activity reporting procedures, and anti-retaliation.

Additional information on employee training and development at GEO is provided in the ESG Report chapters, Our Commitment to Human Rights and Creating Opportunities: Developing our People, as well as on GEO's website at: https://www.geogroup.com/commitment_to_training_excellence

**MEETING OUR OBLIGATIONS:
OVERSIGHT
AND CONTRACT
COMPLIANCE**



As a service provider to various federal, state, and local government agencies for the past three decades, GEO is committed to providing professional services that meet or exceed the strict standards set by each of our government customers.

Along with satisfying governmental requirements, GEO employees also adhere to guidelines established by leading third-party accreditation agencies.

Each year, we devote substantial resources to assuring compliance with contractual requirements and that integrity and quality are maintained at all of our facilities. This is the direct responsibility of GEO's Contract Compliance Division.

The Contract Compliance Division was established to operate independently of each of our business units and divisions, reporting directly to the company's Chairman and Chief Executive Officer.

The Division uses an ongoing, formal process to review all operational aspects of GEO's U.S. operations. The process involves performing scheduled audits and related follow-ups for GEO Secure Services facilities and GEO Care's BI, Abraxas, and Reentry Services divisions. The process also involves extensive training of individuals with compliance and quality responsibilities at each of our facilities throughout the U.S.

GEO's Contract Compliance Division is managed by an Executive Vice President and is comprised of 41 additional highly skilled quality assurance staff who implement our Quality Control Program across our U.S. operations. They are engaged in systematic monitoring, facility audits and review of healthcare programs, and provide input with policy reviews and development of corrective action plans.

GEO utilizes many different audit tools, some of which have been provided by our government customers. Most of the audit tools

GEO employees adhere to guidelines established by leading third-party accreditation agencies



were developed directly by GEO's Contract Compliance team and are continually refined – to assess and assure compliance with the full range of standards and requirements set by our government customers, including:

- **At the Federal level:** the Federal Bureau of Prisons (BOP), U.S. Immigration and Customs Enforcement (ICE), and the U.S. Marshals Service (USMS).
- **State level:** State correctional agencies, such as individual state departments of corrections.
- **Municipal level:** Community corrections agencies and county jails.

The standards set by these governmental bodies typically apply to almost every aspect of the operation of our facilities, such as security and safety protocols, programs, food service and nutrition, living conditions, health care, recreation, religious services, work programs, mail, grievances, visitation, telephone access, and staff training.

As an example, ICE's "Performance-Based National Detention Standards 2011" (as revised in 2016) contain sections on safety, security, order, care, activities, justice, and administration and management, with specific instructions and protocols detailed in 44 sub-sections.

GEO's Quality Control Program is designed to improve operational performance and compliance with our established policies, government contracts, and recognized independent accreditation standards.

GEO Secure Services - U.S. Audit Activity: 2016-2018

	2018	2017	2016
<i>Total Active U.S. Secure Facilities</i>	63	63	60
<i>Internal GEO Contract Compliance Audits Completed</i>	142	123	136
<i>Government Customer Audits Completed</i>	69	96	81
<i>Third-party Inspections Completed</i>	47	44	38

GEO's Contract Compliance audit teams travel to each of our facilities across the country to conduct three to four-day annual reviews. The teams include up to eight subject matter experts who review all standards applicable to each specific facility or site.

In addition to the annual reviews conducted at all GEO facilities, the Contract Compliance team reviews and acts upon findings of separate government-conducted audits and ongoing monitoring activities.

GEO's Quality Control Program includes field and remote audits, the development and implementation of corrective action plans, accreditation preparation, and verification activity. Designed to prevent errors, identify gaps in operational excellence, and mitigate performance deficiencies, the program involves the following:

Two-part Compliance Process

Part one is an audit led by the Contract Compliance Division staff and field-based subject matter experts. The second part involves internal audits coordinated by each facility's dedicated compliance administrator or program director.

Consistent Content

Both types of audits include questions from GEO policies and procedures, contract requirements, applicable third-party accreditation standards, and government audit findings. The audits cover every issue GEO's government customers use in their own individual audit activities.

Analytics and Reporting

Both sets of audit results are entered in the Contract Compliance Division's database, analyzed and shared with all levels of GEO's management leadership to identify trends and potential for improvement opportunities.

Continuous Improvement

At year-end, all applicable Contract Compliance audit tools will have been evaluated for continued adherence with requirements. Audit results are used to develop effective corrective actions, where needed, as well as, to inform daily monitoring practices to ensure thorough and sustained compliance.

Specialized Health Care Assessments

A dedicated health care team within the Contract Compliance Division audits all aspects

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of health care treatment provided at GEO Secure Services and applicable Reentry facilities in the U.S. to assess the quality of each facility's health care program, identify improvement areas, and assist in developing effective corrective action plans as needed. The Contract Compliance health care team includes five compliance specialists, of which one is the Corporate Director and one is a Corporate Manager who are medical doctors with more than 50 years of combined experience.

COMPLIANCE TRAINING

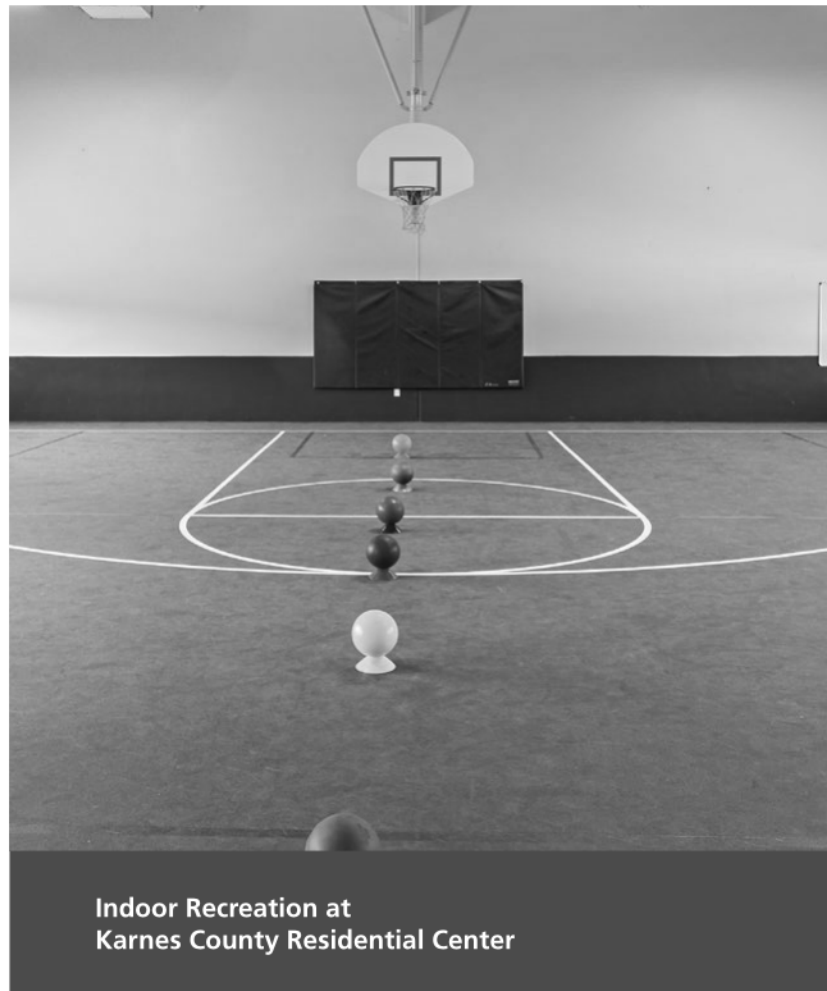
The GEO Contract Compliance department has a dedicated team responsible for the provision of training for new compliance staff at each facility across all GEO divisions. This team was established to provide a consistent message and level of training to all facility compliance staff. The training program includes topics such as quality control program procedures, auditing techniques, policy writing, and corrective action plan development.

Additionally, the Contract Compliance department makes training available annually to compliance staff via an electronic learning management system. Training topics vary from year to year and may include goal setting, policy writing, and effective time management.

GEO has consistently received a rating of "Exceeds Standard" during PREA certification audits for standard 115.31 "Employee Training." All employees receive initial and annual refresher training that includes, but is not limited to: GEO's zero-tolerance policy for sexual abuse and harassment; reporting requirements; communicating effectively and professionally with individuals in GEO facilities including LGBTI individuals; how to avoid inappropriate relationships with individuals in a GEO facility; and the detection and response to signs of threatened and actual sexual abuse.

MEETING STANDARDS AT U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE) PROCESSING CENTERS

GEO has been a long-standing service provider to the federal government and U.S. Immigration and Customs Enforcement (ICE) dating back to the



mid-1980s. All of GEO's ICE Processing Centers operate in accordance with ICE's Performance-Based National Detention Standards (inclusive of any applicable waivers), established under President Barack Obama's Administration. ICE employs several full-time, on-site contract monitors, who are permanently located at each of our facilities.

In addition, GEO generally provides permanent office space for hundreds of ICE personnel, immigration attorneys, immigration court judges, and other federal government officials.

All of GEO's ICE Processing Centers are audited and inspected by the agency on a routine and unannounced basis. Also, each facility is reviewed by independent accreditation entities, including the American Correctional Association (ACA) and the National Commission on Correctional Health Care (NCCHC).

U.S. THIRD-PARTY ACCREDITATION ENTITIES

In addition to complying with standards established by each of our government contracting agencies, GEO adheres to operational standards promulgated by several leading third-party accreditation organizations and opens its facilities to inspection and review by these associations, commissions, and councils.

As a matter of corporate policy, all GEO facilities are designed and operated in general accordance with the recommendations of one or more of the following organizations:

American Correctional Association (ACA)

The oldest association developed specifically for practitioners in the correctional profession, ACA has thousands of members in all parts of the world. Its rigorous accreditation process and standards promote ethics with the justice profession, address all aspects of correctional facility operations and management, and are based on valid, reliable research and exemplary correctional practice.

National Commission on Correctional Health Care (NCCHC)

Given its stated mission to improve the quality of health care in jails, prisons, and juvenile confinement facilities, NCCHC establishes standards for health services in correctional facilities, operates a voluntary accreditation program for institutions that meet those standards, produces and disseminates resource publications, conducts educational conferences, and offers a certification program for correctional health professionals.

The Joint Commission

An independent, not-for-profit organization, The Joint Commission accredits and certifies over 22,000 health care organizations and programs in the U.S. Joint Commission accreditation and certification is recognized nationwide as a symbol of quality that reflects an organization's commitment to meeting certain performance standards.



ACA Innovation in Corrections Award presented to GEO Continuum of Care® in 2018

Prison Rape Elimination Act (PREA)

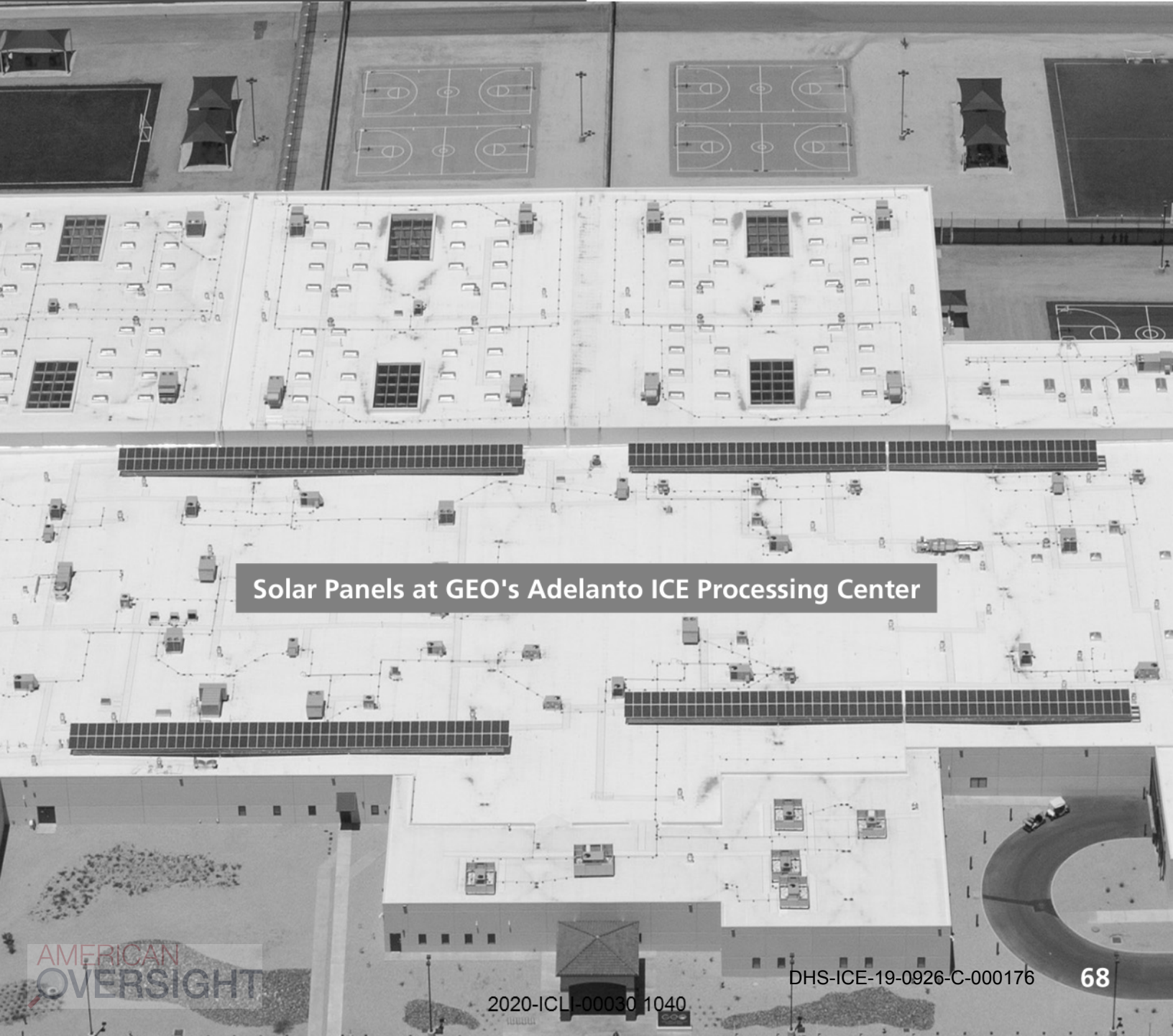
The Prison Rape Elimination Act (PREA) was passed in 2003 with unanimous support from both parties in the United States Congress. The purpose of the act was to “provide for the analysis of the incidence and effects of prison rape in Federal, State, and local institutions and to provide information, resources, recommendations and funding to protect individuals from prison rape.”

Following passage of PREA, the U.S. Department of Justice issued National Standards To Prevent, Detect, and Respond To Prison Rape (Final Rule, dated, June 2012)¹, and the U.S. Department of Homeland Security issued ‘Standards to Prevent, Detect and Respond to Sexual Abuse and Assault in Confinement Facilities’ (79 Fed. Reg. 13100, Subpart A dated March 7, 2014)².

¹ 28 C.F.R. Part 115 (2019)

² 6 C.F.R. Part 115 (2019)

ENERGY AND ENVIRONMENTAL SUSTAINABILITY

An aerial photograph of the Adelanto ICE Processing Center. The image shows a large, rectangular building with a flat roof. Several long, rectangular solar panel arrays are mounted on the roof, arranged in a grid-like pattern. The surrounding area includes parking lots with several vehicles, some smaller structures, and a curved road in the bottom right corner. The overall scene is captured from a high angle, providing a clear view of the facility's layout and the solar installation.

Solar Panels at GEO's Adelanto ICE Processing Center

GEO is committed to creating sustainable environments in the operation of our facilities throughout the U.S. and worldwide. For several years, we have been monitoring our facilities' utility operating costs on a monthly basis, including electricity, natural gas, water usage, waste disposal, and carbon emissions to encourage each facility to focus on conservation measures and enhance environmental sustainability efforts.

In 2017, we issued an internal utility sustainability report, ranking leading and trailing facilities throughout our company in terms of electricity, gas and water usage, and solid waste generation. The report also provided instructions and strategies to staff for reducing the consumption of energy and water resources, and addressing waste production. As individual GEO facilities adopt a green operational philosophy, the facilities are better able to manage energy consumption, reduce emissions, and lower operating costs.

In addition to the energy conservation activities at existing GEO facilities, at each of our newly-constructed facilities, we are implementing a wide range of green initiatives, including:

- Use of R30 insulation in roofing
- R20 insulation in walls
- White reflective roofing materials
- Building management systems
- Low-flow showerheads
- Use of recycled water in laundry operations
- High efficiency LED lighting
- Occupancy sensors in offices and classrooms for lighting
- Use of gas for hot water heating instead of electricity
- Cycling of air conditioners using the building management system to avoid utility peak load charges
- Skylights for natural light with light level sensors for balancing artificial lighting loads
- Low flow plumbing fixtures
- Control of plumbing fixtures, including showers, from control rooms
- Waterless urinals
- Use of timers/photocells on exterior lighting
- High efficiency HVAC equipment
- Use of chilled water systems vs. rooftop DX units
- Heat recovery for laundry exhaust
- Photovoltaic solar panels

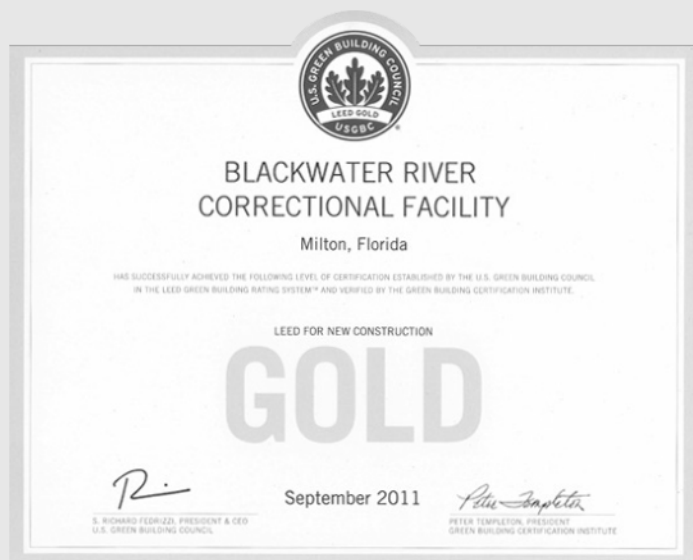


As individual GEO facilities adopt a green operational philosophy, the facilities are better able to manage energy consumption, reduce emissions, and lower operating costs.

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LEED CERTIFICATION

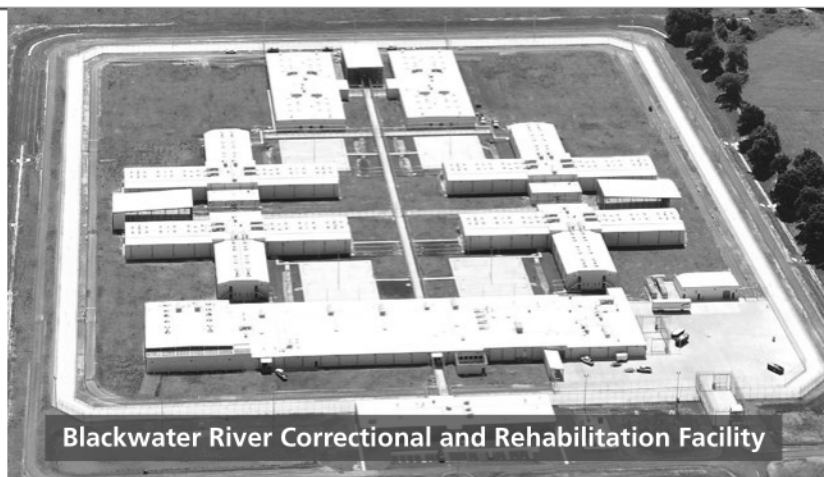
GEO is committed to sustainable building practices that incorporate energy efficiency and mitigate environmental impact in the development of new facilities. We are committed to sustainable operations as reflected in our focus on new design and construction in accordance with LEED standards administered by the Green Building Certification Institute.



GEO's Blackwater River Correctional and Rehabilitation Facility Meets LEED Gold Standards

The facility received LEED Gold Certification in 2011 and has many environmental and energy-efficient features, including:

- Heat-reflective white roofing systems
- Low-flow water fixtures
- Laundry water consumption control system
- Sustainable energy utilization: 70% electrical demand from wind power through the grid
- Waste recycling program
- Chilled water air conditioning system for interior climate management
- Dayrooms with auto shut-off lighting when skylights provide sufficient natural light



Blackwater River Correctional and Rehabilitation Facility

The Green Building Certification Institute

The Leadership in Energy & Environmental Design (LEED) certification program is administered by the Green Building Certification Institute. LEED certification is based on an evaluation of a number of environmental factors including but not limited to the sustainability of the site, the efficient use of water, energy, material, and other resources, the quality of indoor air and overall environment, and the use of innovative and environmentally friendly technologies and strategies.

The Green Building Certification Institute determines that a completed project satisfies all prerequisites and has achieved the minimum number of points outlined in the LEED certification program for the rating system to achieve a particular level of LEED certification -- such as LEED Certified, LEED Silver, LEED Gold or LEED Platinum.

Following GEO's Blackwater River Correctional and Rehabilitation Facility in Milton, Florida becoming the company's first Leadership in Energy & Environmental Design (LEED) Certified project to receive a Gold Certification in 2011, 14 new or expanded GEO facilities throughout the U.S. have been designed in accordance with LEED certification standards. They include three facilities, and GEO's new Corporate Headquarters, designed or built between 2016 and 2018.

Each new facility design takes into account all regulatory requirements, as well as, applicable energy-saving and safety features.

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CAREFUL, THOUGHTFUL PLANNING, NEW CONSTRUCTION APPROACHES HELP PROTECT GEO EMPLOYEES AND THOSE UNDER OUR CARE FROM IMPACT OF SERIOUS WEATHER EVENTS

In recent years a significant number of serious weather events have struck many parts of the U.S. As part of its risk management responsibilities, GEO conducts extensive, ongoing crisis and business preparation and continuity planning at all of its facilities. We also are focusing on building new facilities that are better able to withstand the impact of such events.

Protecting those in our care during a major hurricane.

In 2018, when Hurricane Michael inflicted substantial damage at the GEO-managed Bay Correctional and Rehabilitation Facility in Panama City, Florida, we were able to evacuate all 963 individuals under our care and transport them safely to other facilities until we were able to repair the facility.

Even though the roofing of every structure in the facility had to be replaced, along with much of the gymnasium, flooring and electrical system, those in our care were gradually able to begin returning to the facility within three months of the storm. Several weeks later, the facility was fully operational with a complete slate of educational program offerings.

New facility built to withstand serious weather events.

Completed in 2018, GEO's Montgomery Processing Center in Conroe, Texas was designed in accordance with Leadership in Energy and Environmental Design (LEED) Silver standards, a globally-recognized symbol of sustainability achievement. Comprised of highly efficient and cost-saving green buildings, the Center was designed to International Code Council (ICC) 500 standards as a Hurricane Shelter, was developed to be able to withstand a category 5 hurricane, and is expected to provide 100 percent auxiliary power in times of emergency.

Individuals in our care at the Montgomery Processing Center have access to enhanced recreational opportunities including artificial turf soccer fields, shaded pavilions, basketball courts, paved walk path, and handball courts, and the Center features extensive onsite administrative office, courtroom, and support spaces.

More information on the Montgomery Processing Center is available on our company website at: www.geogroup.com/GEO-World-Detail/WorldID/57

ENVIRONMENTAL INITIATIVES AT BI INCORPORATED (BI)

GEO's BI Incorporated division, which manufactures electronic monitoring devices, has initiated environmental measures to promote recycling and re-use of materials. The majority of equipment orders are shipped to the facility in plastic cases, which can be re-used four to five times longer than previous cardboard shipping containers. Packaging for supplier parts also contains recycled content, and BI has implemented a shipping carton return service.

In the U.S., BI also launched an environmental operation in its manufacturing facility to recycle, repair, and reuse plastic products. Other green initiatives at BI include the installation of energy-efficient lighting and the procurement of products free of Ozone Depleting Chemicals (ODCs), lead, and other harmful substances.

Additional details regarding GEO's energy-saving, conservation, and green building initiatives are available on our website at: www.geogroup.com/Sustainability

PROVIDING RESILIENCY FROM THE IMPACT OF NATURAL DISASTERS

In recent years, the large number of serious weather events occurring throughout the U.S. and the U.S. Geological Survey's recalibration of the country's seismic exposures led to changes in various building codes and safety requirements.

Accordingly, we have made design modifications to our facilities in affected areas to comply with new codes and contractual requirements to protect the safety of our employees, those in our care, government employees, contractors, and visitors.

For instance, the Montgomery Processing Center in Conroe, Texas was designed as one of the first facilities in the country to be ICC 500 compliant, which qualifies this facility to act as a hurricane shelter. Its finish floor elevation was set above the 500-year flood plain. It also has full facility double redundant emergency power back-up, which provides a minimum 72 hours of back-up power with service contracts for refueling.

In other flood-exposed areas across the U.S., GEO strives to acquire sites that are protected from floodwater intrusion. All designs have the facilities' finish floor elevations set at least above the 100-year flood plain.

FINANCIAL MANAGEMENT AND PERFORMANCE



The GEO Group, Inc. (NYSE: GEO) is the first fully integrated equity real estate investment trust (REIT) specializing in the design, financing, development, and operation of secure facilities, processing centers, and community re-entry centers in the United States, Australia, South Africa, and the United Kingdom.

As described on our company website and in our 2018 Annual Report (www.snl.com/interactive/newlookandfeel/4144107/GEOGroup2018AR.pdf), GEO's operations include the following:

- GEO U.S. Secure Services (www.geogroup.com/GEO_Secure_Services)
- GEO Care (www.geogroup.com/GEO-Care), which encompasses the GEO Continuum of Care®, GEO Reentry Services, Abraxas Youth Services, and BI Incorporated Electronic Monitoring
- International Services (www.geogroup.com/GEO_Secure_Services), which includes The GEO Group UK Ltd, The GEO Group Australia, and South African Custodial Management
- GEO Transport, Inc. (www.geogroup.com/GEO_Transport_Inc)
- The GEO Group Foundation (www.geogroup.com/foundation)

Additional details regarding GEO's structure and financial performance can be found on our Investor Relations website at: <http://investors.geogroup.com>

GEO FINANCIAL RESULTS

	2018	2017	2016
Revenues*	\$2,331,386	\$2,263,420	\$2,179,490
Operating Income*	\$264,665	\$248,285	\$265,584
Net Income*	\$144,827	\$146,024	\$148,498
Diluted EPS	\$1.20	\$1.21	\$1.33
Facilities in Operation	135	141	104
U.S. Employees	18,427	18,044	15,925
Total Employees	23,630	22,968	20,322

*\$ in Thousands (except for Diluted EPS amounts)

DHS-ICE-19-0926-C-000181

GRI Standard	Disclosure	Report Location or External GEO Reference
GRI 102: General Disclosures		
GRI 102: General Disclosures 2016	<i>Organizational profile</i>	
	102-1 Name of the organization	Letter from our Chairman, CEO and Founder; Page 2 10-K; Page 1
	102-2 Activities, brands, products, and services	About the GEO Group; Pages 6-7 Core Values & Mission Statement; Page 8 10-K; Pages 3-27
	102-3 Location of headquarters	Boca Raton, FL GEO HQ Facility Details 10-K; Page 1
	102-4 Location of operations	About the GEO Group; Page 6 10-K; Pages 174-186
	102-5 Ownership and legal form	Publicly-traded Real Estate Investment Trust 10-K; Pages 1 and 3
	102-6 Markets served	About the GEO Group; Pages 6-7 Core Values & Mission Statement; Page 8 10-K; Pages 3-27
	102-7 Scale of the organization	Financial Management and Performance; Page 73 10-K; Pages 3-53
	102-8 Information on employees and other workers	Creating Opportunities: Developing our People; Pages 40-44 10-K; Pages 24-25
	102-9 Description of the organization's supply chain	Engaging with Our Stakeholders; Page 59
	102-10 Significant changes to the organization and its supply chain	There have been no significant changes to the organization or its supply chain.
	102-11 Precautionary Principle or approach	Delivering on Our Promise: Ethics and Governance; Pages 61-62 Meeting Our Obligations: Oversight and Contract Compliance; Pages 64-67
	102-12 External initiatives	GEO Group ESG Process, Rationale and Objectives; Page 10
	102-13 Membership of associations	Creating Opportunities: Developing Our People; Page 43 Engaging with Our Stakeholders; Page 57 Delivering on our Promise: Oversight and Contract Compliance; Page 67
	<i>Strategy</i>	
	102-14 Statement from senior decision-maker	Letter from our Chairman, CEO and Founder; Page 2
	102-15 Key impacts, risks, and opportunities	GEO Group ESG Process, Rationale and Objectives; Page 10-13
	<i>Ethics and integrity</i>	
	102-16 Values, principles, standards, and norms of behavior	Core Values & Mission Statement; Page 8 Delivering on Our Promise: Ethics and Governance; Pages 61-62 Meeting Our Obligations: Oversight and Contract Compliance; Page 64-67 GEO's Code of Business Conduct and Ethics
	102-17 Mechanisms for advice and concerns about ethics	Delivering on Our Promise: Ethics and Governance; Pages 61-62 Meeting Our Obligations: Oversight and Contract Compliance; Pages 65-67 GEO's Code of Business Conduct and Ethics Business Code & Ethics: Anti-bribery Corruption Training & Whistleblower Programs

GRI Standard	Disclosure	Report Location or External GEO Reference
GRI 102: General Disclosures 2016	<i>Governance</i>	
	102-18 Governance structure	Delivering on Our Promise: Ethics and Governance; Page 62 2019 Proxy; Pages 14-21 2018 Annual Report; Pages 4-5
	102-20 Executive-level responsibility for economic, environmental, and social topics	Letter from our Chairman, CEO and Founder; Page 2 Delivering on Our Promise: Ethics and Governance; Page 62 Meeting Our Obligations: Oversight and Contract Compliance; Pages 64-67 2018 Annual Report; Page 6
	102-21 Consulting stakeholders on economic, environmental, and social topics	GEO Group ESG Process, Rationale and Objectives; Pages 10-12 Engaging with Our Stakeholders; Page 56
	102-22 Composition of the highest governance body and its committees	Delivering on Our Promise: Ethics and Governance; Page 62 2019 Proxy Statement; Pages 14-21
	102-23 Chair of the highest governance body	Delivering on Our Promise: Ethics and Governance; Page 62 2019 Proxy Statement; Page 10
	102-24 Nominating and selecting the highest governance body	2019 Proxy Statement; Pages 3-9; 17-19
	102-25 Conflicts of interest	Delivering on Our Promise: Ethics and Governance; Page 61 GEO's Code of Business Conduct and Ethics 2019 Proxy; Pages 19-20; 24
	102-26 Role of highest governance body in setting purpose, values, and strategy	GEO Group ESG Process, Rationale and Objectives; Pages 11-12 Delivering on Our Promise: Ethics and Governance; Page 62 2018 Annual Report; Page 6
	102-27 Collective knowledge of highest governance body	GEO Group ESG Process, Rationale and Objectives; Pages 11-12 Delivering on Our Promise: Ethics and Governance; Page 62 2018 Annual Report; Page 6
	102-31 Review of economic, environmental, and social topics	GEO Group ESG Process, Rationale and Objectives; Pages 10-11 GEO Human Rights Report: Criteria/Metrics Used to Assess Human Rights Performance; Pages 17-31 Making an Impact: Addressing Recidivism; Page 54
	102-33 Communicating critical concerns	Business Code & Ethics: Anti-bribery Corruption Training & Whistleblower Programs Corporate Policy & Procedure: Chapter 5 - Oversight
	102-35 Remuneration policies	2019 Proxy Statement; Pages 24-42
	102-36 Process for determining remuneration	2019 Proxy Statement; Pages 45; 47
	102-37 Stakeholders' involvement in remuneration	2019 Proxy Statement; Pages 45; 47
	102-38 Annual total compensation ratio	2019 Proxy Statement; Pages 43-44
	102-39 Percentage increase in annual total compensation ratio	2018 Proxy Statement; Pages 41-42 2019 Proxy Statement; Pages 43-44
	<i>Stakeholder engagement</i>	
	102-40 List of stakeholder groups	Engaging with Our Stakeholders; Page 56
	102-41 Collective bargaining agreements	Creating Opportunities: Developing Our People; Page 43

Human Rights & ESG Report

GRI Standard	Disclosure	Report Location or External GEO Reference
GRI 102: General Disclosures 2016	102-42 Identifying and selecting stakeholders	Engaging with Our Stakeholders; Page 56 ESG Process, Rationale and Objectives; Page 10-11
	102-43 Approach to stakeholder engagement	Engaging with Our Stakeholders; Pages 56-59 ESG Process, Rationale and Objectives; Pages 10-12
	102-44 Key topics and concerns raised	Engaging with Our Stakeholders; Pages 56-59 ESG Process, Rationale and Objectives; Pages 10-12
	<i>Reporting practice</i>	
	102-45 Entities included in the consolidated financial statements	Financial Management and Performance; Page 73 10K; Pages 93-94
	102-46 Defining report content and topic Boundaries	Letter from our Chairman, CEO and Founder; Page 2 ESG Process, Rationale and Objectives; Pages 10-12
	102-47 List of material topics	ESG Process, Rationale and Objectives; Pages 10-12 Engaging with Our Stakeholder; Page 56
	102-48 Restatements of information	This is GEO's first year issuing an ESG report.
	102-49 Changes in reporting	This is GEO's first year issuing an ESG report.
	102-50 Reporting period	January 1, 2018 - December 31, 2018
	102-51 Date of most recent report	This is GEO's first year issuing an ESG report.
	102-52 Reporting cycle	GEO expects to report on an annual basis.
	102-53 Contact point for questions regarding the report	IR@geogroup.com
	102-54 Claims of reporting in accordance with the GRI Standards	We referenced the GRI Standards during the development of this report and we include a GRI Standards Content Index for navigation and organization of our ESG disclosures. ESG Process, Rationale and Objectives; Page 10
	102-55 GRI content index	GRI Standards Content Index; Pages 74- 77
	102-56 External assurance	No external assurance is provided at this time.
Economic Topics		
GRI 102: General Disclosures 2016	<i>Economic Performance</i>	
	201-1 Direct economic value generated and distributed	2018 Annual Report; Page 40
GRI 204: Procurement Practices 2016	<i>Procurement Practices</i>	
	204-1 Proportion of spending on local suppliers	Engaging with Our Stakeholders; Page 59
GRI 205: Anti-corruption 2016	<i>Anti-corruption</i>	
	205-1 Operations assessed for risks related to corruption	GEO's Code of Conduct and Ethics articulates the company's policies and guidelines with respect to compliance with anti-bribery and anti-corruption laws.
	205-2 Communication and training about anti-corruption policies and procedures	The standards and policies described in each section of GEO's Code of Conduct and Ethics are communicated widely throughout our organization and reinforced with each of our employees through rigorous and ongoing training.
Environmental Topics		
GRI 302: Energy 2016	<i>Energy</i>	
	302-1 Energy consumption within the organization	Energy and Environmental Sustainability; Pages 69-70
	302-4 Reduction of energy consumption	Energy and Environmental Sustainability; Pages 69-70
	302-5 Reductions in energy requirements of products and services	Energy and Environmental Sustainability; Pages 69-71

Human Rights & ESG Report

GRI Standard	Disclosure	Report Location or External GEO Reference
Social Topics		
GRI 401: Employment 2016	<i>Employment</i>	
	401-1 New employee hires and employee turnover	Creating Opportunities: Developing Our People; Pages 40-41
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Creating Opportunities: Developing Our People; Pages 41-42, 44
GRI 403: Occupational Health and Safety 2018	<i>Occupational Health and Safety</i>	
	403-1 Occupational health and safety management system	Ensuring Safety and Security; Page 47
	403-2 Hazard identification, risk assessment, and incident investigation	Ensuring Safety and Security; Page 47
	403-5 Worker training on occupational health and safety	Ensuring Safety and Security; Page 47
GRI 404: Training and Education 2016	<i>Training and Education</i>	
	404-1 Average hours of training per year per employee	Creating Opportunities: Developing Our People; Pages 42
	404-2 Programs for upgrading employee skills and transition assistance programs	Human Rights Report; Pages 15-16 Creating Opportunities: Developing Our People; Pages 42, 44
GRI 405: Diversity and Equal Opportunity 2016	<i>Diversity and Equal Opportunity</i>	
	405-1 Diversity of governance bodies and employees	Creating Opportunities: Developing Our People; Pages 40-41
GRI 410: Security Practices 2016	<i>Security Practices</i>	
	410-1 Security personnel trained in human rights policies or procedures	Human Rights Report; Pages 15-16 Creating Opportunities: Developing Our People; Page 42
	<i>Human Rights Assessment</i>	
GRI 412: Human Rights Assessment 2016	412-1 Operations that have been subject to human rights reviews or impact assessments	Human Rights Report; Pages 31-38
	412-2 Employee training on human rights policies or procedures	Human Rights Report; Pages 15-16 Creating Opportunities: Developing Our People; Page 42
GRI 415: Public Policy 2016	<i>Public Policy</i>	
	415-1 Political contributions	<u>GEO Political Engagement</u>



The GEO Group, Inc. ®

WORLD HEADQUARTERS

4955 Technology Way

Boca Raton, Florida 33431 USA

561.893.0101 866.301.4436

www.geogroup.com

From: (b)(6); (b)(7)(C)
Sent: 12 Feb 2020 16:47:12 +0000
To: (b)(6); (b)(7)(C)
Subject: Re: [EXTERNAL] Adelanto

Hi (b)(6);

Are transgender issues in your portfolio now?

If so, I'd like to chat when you can.

Thanks.

(b)(6);
(b)(7)(C)

From: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@ice.dhs.gov>
Date: Wednesday, February 12, 2020 at 7:57 AM
To: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@geogroup.com>
Subject: RE: [EXTERNAL] Adelanto

Good morning, just checking in - Did you find out who the POC is for religious services?

(b)(6); (b)(7)(C)

Sent with BlackBerry Work
(www.blackberry.com)

From: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@geogroup.com>
Date: Thursday, Feb 06, 2020, 3:15 PM
To: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@ice.dhs.gov>
Subject: Re: [EXTERNAL] Adelanto

Thanks. Will review.

From: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@ice.dhs.gov>
Date: Thursday, February 6, 2020 at 4:11 PM
To: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@geogroup.com>
Subject: [EXTERNAL] Adelanto

Mental Health starts on page 7.

From: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@geogroup.com>
Sent: Thursday, February 6, 2020 11:20 AM

From: (b)(6); (b)(7)(C)
Sent: 12 Feb 2020 13:30:51 +0000
To: (b)(6); (b)(7)(C)
Subject: Re: [EXTERNAL] Adelanto

Good morning,

I'm sorry, I thought I responded and wrote that it is still (b)(6); (b)(7)(C) Sorry for the delay.

56199 (b)(6);

(b)(6);
(b)(7)(C) @geogroup.com

Let me know if I can help with anything.

(b)(6);
(b)(7)(C)

From: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@ice.dhs.gov>
Date: Wednesday, February 12, 2020 at 7:57 AM
To: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@geogroup.com>
Subject: RE: [EXTERNAL] Adelanto

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(b)(6);
(b)(7)(C)

Sent with BlackBerry Work
(www.blackberry.com)

From: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@geogroup.com>
Date: Thursday, Feb 06, 2020, 3:15 PM
To: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@ice.dhs.gov>
Subject: Re: [EXTERNAL] Adelanto

Thanks. Will review.

From: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@ice.dhs.gov>
Date: Thursday, February 6, 2020 at 4:11 PM
To: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@geogroup.com>
Subject: [EXTERNAL] Adelanto

Mental Health starts on page 7.

From: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@geogroup.com>
Sent: Thursday, February 6, 2020 11:20 AM

From: (b)(6); (b)(7)(C)
Sent: 6 Feb 2020 13:43:48 +0000
To: (b)(6); (b)(7)(C)
Subject: Re: [EXTERNAL] RE: Religious Services POC?

Good morning Nathalie. Does 11am today work?

From: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@ice.dhs.gov>
Date: Thursday, February 6, 2020 at 8:23 AM
To: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@geogroup.com>
Subject: [EXTERNAL] RE: Religious Services POC?

(b)(6);
(b)(7)(C)

I have no meetings tomorrow/Friday morning. If there is a particular time that works for you, I can call you.

I am out of the office all next week...

(b)(6); (b)(7)(C)

202 907 (b)(6);

From: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@geogroup.com>
Sent: Wednesday, February 5, 2020 6:39 PM
To: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@ice.dhs.gov>
Subject: Re: Religious Services POC?

Hi (b)(6); (b)(7)(C)

Good to hear from you! I'd love to catch up. Let me know what's a good time, and I hope all is well.

Let me see who is the best POC. It may still be (b)(6); (b)(7)(C)

Best,

(b)(6);
(b)(7)(C)

Get [Outlook for iOS](#)

From: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@ice.dhs.gov>
Sent: Wednesday, February 5, 2020 5:14:04 PM
To: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@geogroup.com>
Subject: [EXTERNAL] Religious Services POC?

Good afternoon (b)(6);
(b)(7)(C)

I hope this note finds you well. I have a quick question. One of my team members who works on religious services is interested in connecting with someone at GEO who works on these issues. Previously, I believe we worked with (b)(6); (b)(7)(C) Can you tell me who would be a good POC. No issues, my team member just wants to pro-actively connect about chaplains, religious services, etc.

Separately, I would love to catch up with you sometime soon. I am working with a larger portfolio involving a number of special populations in custody and enjoying it...

(b)(6);
(b)(7)(C)

(b)(6); (b)(7)(C) nit Chief
Special Populations and Programs
Custody Programs Division
Enforcement and Removal Operations (ERO)
U.S. Immigration and Customs Enforcement (ICE) | Department of Homeland Security (DHS)
202.907 (b)(6);
(b)(7)(C) Cell
(b)(6); (b)(7)(C) e.dhs.gov



Homeland
Security

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From: (b)(6); (b)(7)(C)
Sent: 16 Aug 2019 12:54:37 +0000
To: (b)(6); (b)(7)(C)
Subject: Re: [EXTERNAL] RE (b)(6); (b)(7)(C)

4 PM Est would work better for me if you could do that. I appreciate your understanding and flexibility.

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@ice.dhs.gov>
Date: 8/16/19 7:38 AM (GMT-06:00)
To: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@ice.dhs.gov>, (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@geogroup.com>, (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@ice.dhs.gov>, (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@geogroup.com>
Subject: [EXTERNAL] RE (b)(6); (b)(7)(C)

I could change the time to 2 , 3, or 4 p.m EST today if that is helpful?

From: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@geogroup.com>
Sent: Friday, August 16, 2019 8:16 AM
To: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@ice.dhs.gov>, (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@ice.dhs.gov>, (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@geogroup.com>, (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@geogroup.com>
Subject: Re: (b)(6); (b)(7)(C)

Please be aware that due to a flight cancellation, I will now be boarding a plane around 1000 CST. I will only be able to attend a portion of our regularly scheduled call today.

(b)(6); (b)(7)(C) RN, RHSM
Eastern Region Health Services Manager Geo Secure Services
The Geo Group, Inc
13777 Ballantyne Corporate Place, Suite (b)(6); (b)(7)(C)
Charlotte, N.C 28277
Tel: 704-543-(b)(6); Mobile: 561-430-(b)(6);
(b)(6); <(b)(6); (b)(7)(C)@geogroup.com>
www.geogroup.com

From: (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)@geogroup.com>
Sent: Wednesday, August 14, 2019 3:46:40 PM

To: (b)(6); (b)(7)(C) @ice.dhs.gov>; (b)(6); (b)(7)(C)
(b)(6); (b)(7)(C) @ice.dhs.gov>
Subject: Re: (b)(6); (b)(7)(C)

Thank you for offering to call and provide us with information needed to comply with the DAN process. I am available all day tomorrow. Friday morning I fly out for the weekend and will be available Friday from 1100-1400 EST, as well as anytime after 1500 EST.

Thanks again.

(b)(6); (b)(7)(C) RN, RHSM
Eastern Region Health Services Manager Geo Secure Services
The Geo Group, Inc
13777 Ballantyne Corporate Place, Suite (b)(6)
Charlotte, N.C 28277
Tel: 704-543-(b)(6) Mobile: 561-430-(b)(6);
(b)(6); @geogroup.com
www.geogroup.com

From: (b)(6); (b)(7)(C) @ice.dhs.gov>
Sent: Wednesday, August 14, 2019 3:42:50 PM
To: (b)(6); (b)(7)(C) @geogroup.com>
Cc: (b)(6); (b)(7)(C) @geogroup.com>; (b)(6); (b)(7)(C) @geogroup.com>;
(b)(6); (b)(7)(C) @ice.dhs.gov>
Subject: [EXTERNAL] RE: (b)(6); (b)(7)(C)

(b)(6); (b)(7)(C) as offered to give you guys a briefing on the process over the phone. She is a senior official in this program at HQ. I would like to coordinate a call in the next day or so. This information will be a huge benefit to you.

(b)(6); (b)(7)(C) what would be a good time for you? Conference call? One on one between you and Pine Prairie?

From: (b)(6); (b)(7)(C) @geogroup.com>
Sent: Wednesday, August 14, 2019 2:23 PM
To: (b)(6); (b)(7)(C) @ice.dhs.gov>
Cc: (b)(6); (b)(7)(C) @geogroup.com>; (b)(6); (b)(7)(C) @geogroup.com>;
(b)(6); (b)(7)(C) @ice.dhs.gov>
Subject: Re: (b)(6); (b)(7)(C)

I apologize for the errors with the DAN forms. Please be advised that Pine Prairie is in a transitional period since the previous H.S.A. (b)(6); (b)(7)(C) has left the facility. I will be sitting in as the Acting HSA until we acquire a new one. I will re-send the DANs with

the information that you have requested. I have completed a record review and we have determined that some of these patients no longer require lower bunk status. I will send you the DANs for those that still require accommodations.

(b)(6); (b)(7)(C)

N, RHSM

Eastern Region Health Services Manager Geo Secure Services

The Geo Group, Inc

13777 Ballantyne Corporate Place, Suite (b)(6)

Charlotte, N.C 28277

Tel: 704-543-(b)(6); Mobile: 561-430-(b)(6);

(b)(6); @geogroup.com

www.geogroup.com

From: (b)(6); (b)(7)(C) @ice.dhs.gov>

Sent: Wednesday, August 14, 2019 1:20:36 PM

To: (b)(6); (b)(7)(C) @geogroup.com>

Cc: (b)(6); (b)(7)(C) @geogroup.com> (b)(6); (b)(7)(C) @geogroup.com>;

(b)(6); (b)(7)(C) @ice.dhs.gov>

Subject: [EXTERNAL] FW: (b)(6); (b)(7)(C)

These were all sent to the incorrect person. I have looked at a few and none of them show what the disability is with the detainee. Please resend with the disability listed, plan of care and any accommodation.

Thank you

From: (b)(6); (b)(7)(C)

Sent: Wednesday, August 14, 2019 12:14 PM

To: (b)(6); (b)(7)(C) @ice.dhs.gov>

Subject: (b)(6); (b)(7)(C)

These are for you too...

From: (b)(6); (b)(7)(C)
Sent: 16 Aug 2019 12:15:30 +0000
To: (b)(6); (b)(7)(C)
Subject: Re: (b)(6); (b)(7)(C)

Please be aware that due to a flight cancellation, I will now be boarding a plane around 1000 CST. I will only be able to attend a portion of our regularly scheduled call today.

(b)(6); (b)(7)(C) **RN, RHSM**
Eastern Region Health Services Manager Geo Secure Services
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(b)(6);@geogroup.com
www.geogroup.com

From: (b)(6); (b)(7)(C)<(b)(6); (b)(7)(C)@geogroup.com>
Sent: Wednesday, August 14, 2019 3:46:40 PM
To: (b)(6); (b)(7)(C)<(b)(6); (b)(7)(C)@ice.dhs.gov> (b)(6); (b)(7)(C)<(b)(6); (b)(7)(C)@ice.dhs.gov>
Subject: Re: (b)(6); (b)(7)(C)

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(b)(6);@geogroup.com
www.geogroup.com

From: (b)(6); (b)(7)(C)<(b)(6); (b)(7)(C)@ice.dhs.gov>
Sent: Wednesday, August 14, 2019 3:42:50 PM
To: (b)(6); (b)(7)(C)<(b)(6); (b)(7)(C)@geogroup.com>
Cc: (b)(6); (b)(7)(C)<(b)(6); (b)(7)(C)@geogroup.com> (b)(6); (b)(7)(C)<(b)(6); (b)(7)(C)@geogroup.com>; (b)(6); (b)(7)(C)<(b)(6); (b)(7)(C)@ice.dhs.gov>
Subject: [EXTERNAL] RE: (b)(6); (b)(7)(C)

(b)(6); (b)(7)(C) has offered to give you guys a briefing on the process over the phone. She is a senior official in this program at HQ. I would like to coordinate a call in the next day or so. This information will be a huge benefit to you.

(b)(6); (b)(7)(C), what would be a good time for you? Conference call? One on one between you and Pine Prairie?

From: (b)(6); (b)(7)(C) @geogroup.com>
Sent: Wednesday, August 14, 2019 2:23 PM
To: (b)(6); (b)(7)(C) @ice.dhs.gov>
Cc: (b)(6); (b)(7)(C) @geogroup.com>; (b)(6); (b)(7)(C) @geogroup.com>; (b)(6); (b)(7)(C) @ice.dhs.gov>
Subject: Re: (b)(6); (b)(7)(C)

I apologize for the errors with the DAN forms. Please be advised that Pine Prairie is in a transitional period since the previous H.S.A (b)(6); (b)(7)(C) has left the facility. I will be sitting in as the Acting HSA until we acquire a new one. I will re-send the DANs with the information that you have requested. I have completed a record review and we have determined that some of these patients no longer require lower bunk status. I will send you the DANs for those that still require accommodations.

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(b)(6); (b)(7)(C) @geogroup.com
www.geogroup.com

From: (b)(6); (b)(7)(C) @ice.dhs.gov>
Sent: Wednesday, August 14, 2019 1:20:36 PM
To: (b)(6); (b)(7)(C) @geogroup.com>
Cc: (b)(6); (b)(7)(C) @geogroup.com>; (b)(6); (b)(7)(C) @geogroup.com>; (b)(6); (b)(7)(C) @ice.dhs.gov>
Subject: [EXTERNAL] FV (b)(6); (b)(7)(C)

These were all sent to the incorrect person. I have looked at a few and none of them show what the disability is with the detainee. Please resend with the disability listed, plan of care and any accommodation.

Thank you

From: (b)(6); (b)(7)(C)
Sent: Wednesday, August 14, 2019 12:14 PM
To: (b)(6); (b)(7)(C) @ice.dhs.gov>
Subject: (b)(6); (b)(7)(C)

These are for you too...

From: (b)(6); (b)(7)(C)
Sent: 14 Aug 2019 19:58:06 +0000
To: (b)(6); (b)(7)(C)
Cc:
Subject: Re: Pine Prairie Briefing

1100 EST is good for me. I am looping in our compliance manager and DON to see if they would also like to be part of this discussion if that is okay.

(b)(6); (b)(7)(C) **RN, RHSM**
Eastern Region Health Services Manager Geo Secure Services
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13777 Ballantyne Corporate Place, Suite (b)(6);
Charlotte, N.C 28277
Tel: 704-543-(b)(6); Mobile: 561-430-(b)(6);
(b)(6); geogroup.com
www.geogroup.com

From: (b)(6); (b)(7)(C)@ice.dhs.gov>
Sent: Wednesday, August 14, 2019 3:54:25 PM
To: (b)(6); (b)(7)(C)@geogroup.com>; (b)(6); (b)(7)(C)
(b)(6); (b)(7)(C)@ice.dhs.gov>
Cc: (b)(6); (b)(7)(C)@ice.dhs.gov>
Subject: [EXTERNAL] Pine Prairie Briefing

How is Friday at 1100 EST?

I can send call information and materials. It will be approximately one hour.

From: (b)(6); (b)(7)(C)@geogroup.com>
Sent: Wednesday, August 14, 2019 3:47 PM
To: (b)(6); (b)(7)(C)@ice.dhs.gov>; (b)(6); (b)(7)(C)
(b)(6); (b)(7)(C)@ice.dhs.gov>
Subject: Re: (b)(6); (b)(7)(C)

Thank you for offering to call and provide us with information needed to comply with the DAN process. I am available all day tomorrow. Friday morning I fly out for the weekend and will be available Friday from 1100-1400 EST, as well as anytime after 1500 EST.

Thanks again.

(b)(6); (b)(7)(C) **RN, RHSM**
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From: (b)(6); (b)(7)(C)@ice.dhs.gov>
Sent: Wednesday, August 14, 2019 3:42:50 PM

To: (b)(6); (b)(7)(C)@geogroup.com>
Cc: (b)(6); (b)(7)(C)@geogroup.com>; (b)(6); (b)(7)(C)@ice.dhs.gov>
Subject: [EXTERNAL] RE: (b)(6); (b)(7)(C)

(b)(6); (b)(7)(C) has offered to give you guys a briefing on the process over the phone. She is a senior official in this program at HQ. I would like to coordinate a call in the next day or so. This information will be a huge benefit to you.

(b)(6); (b)(7)(C) what would be a good time for you? Conference call? One on one between you and Pine Prairie?

From: (b)(6); (b)(7)(C)@geogroup.com>
Sent: Wednesday, August 14, 2019 2:23 PM
To: (b)(6); (b)(7)(C)@ice.dhs.gov>
Cc: (b)(6); (b)(7)(C)@geogroup.com>; (b)(6); (b)(7)(C)@geogroup.com>; (b)(6); (b)(7)(C)@ice.dhs.gov>
Subject: Re: Dang

I apologize for the errors with the DAN forms. Please be advised that Pine Prairie is in a transitional period since the previous H.S.A. (b)(6); (b)(7)(C) has left the facility. I will be sitting in as the Acting HSA until we acquire a new one. I will re-send the DANs with the information that you have requested. I have completed a record review and we have determined that some of these patients no longer require lower bunk status. I will send you the DANs for those that still require accommodations.

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From: (b)(6); (b)(7)(C)@ice.dhs.gov>
Sent: Wednesday, August 14, 2019 1:20:36 PM
To: (b)(6); (b)(7)(C)@geogroup.com>
Cc: (b)(6); (b)(7)(C)@geogroup.com>; (b)(6); (b)(7)(C)@geogroup.com>; (b)(6); (b)(7)(C)@ice.dhs.gov>
Subject: [EXTERNAL] FW: (b)(6);

These were all sent to the incorrect person. I have looked at a few and none of them show what the disability is with the detainee. Please resend with the disability listed, plan of care and any accommodation.

Thank you

From: (b)(6); (b)(7)(C)
Sent: Wednesday, August 14, 2019 12:14 PM
To: (b)(6); (b)(7)(C) <[redacted]@ice.dhs.gov>
Subject: (b)(6); (b)(7)(C)

These are for you too...

From: (b)(6); (b)(7)(C)
Sent: 5 Feb 2020 22:14:04 +0000
To: (b)(6); (b)(7)(C)
Subject: Religious Services POC?

Good afternoon (b)(6); (b)(7)(C)

I hope this note finds you well. I have a quick question. One of my team members who works on religious services is interested in connecting with someone at GEO who works on these issues. Previously, I believe we worked with (b)(6); (b)(7)(C). Can you tell me who would be a good POC. No issues, my team member just wants to pro-actively connect about chaplains, religious services, etc.

Separately, I would love to catch up with you sometime soon. I am working with a larger portfolio involving a number of special populations in custody and enjoying it...

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)

Unit Chief

Special Populations and Programs

Custody Programs Division

Enforcement and Removal Operations (ERO)

U.S. Immigration and Customs Enforcement (ICE) | Department of Homeland Security (DHS)

202.907 (b)(6); (b)(7)(C) – Cell

(b)(6); (b)(7)(C) ice.dhs.gov



**Homeland
Security**

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Disregard the other DANs outside of this list that were sent to you. The records were reviewed by the provider and the lower bunks were temporary and discontinued.

I look forward to our call this Friday to clarify the types of information that you need.

Thank you.

(b)(6); (b)(7)(C)
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