



The GEO Group, Inc. ®

HUMAN RIGHTS DUE DILIGENCE

As Published in 2021 Human Rights and ESG Report

HUMAN RIGHTS FOCUSED

GEO acknowledges the unique status of its operations as a service provider to governmental agencies, encompassing the management and operation of secure correctional and rehabilitation facilities, immigration processing centers, community reentry centers and programs, and electronic and location monitoring services. We recognize the significant role that respect for human rights plays in our services in the United States and around the world.

Our commitment to respecting human rights is rooted in our [Global Human Rights Policy](#), which is informed by reference to the United Nation's Universal Declaration of Human Rights and the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work. We acknowledge that the human rights of all persons in our care and of our employees are to be respected without discrimination, bias, or favoritism.

HUMAN RIGHTS DUE DILIGENCE ASSESSMENT

With the assistance of a third-party ESG firm, GEO has conducted a human rights risk assessment/due diligence process, focusing on identifying salient human rights that represent potential risks based on the nature of GEO's business services. This process does not represent an evaluation of GEO's operational performance.

GEO's human rights risk assessment involved a four-step process that included active engagement with all critical stakeholder groups:

- 1. Preparation.** This initial step involved reviewing GEO documents, including GEO's Global Human Rights Policy and other relevant policies as well as procedures, trainings, and other relevant documents. GEO also engaged in dialogue with key investors. We conducted an extensive media scan and prepared an assessment tool in accordance with the Danish Institute for Human Rights and the United Nations Guiding Principles on Business and Human Rights (UNGPR).
- 2. Analysis & Interviews.** The analysis involved creating a shortlist of human rights by stakeholders (inmates/detainees/residents and employees). This step was followed by a series of 26 interviews with key GEO stakeholders.

- 3. Saliency Assessment of Potential Risks.** This step involved assessing and scoring each human right based on the following factors: scale, reach, probability, remediability, and attribution to GEO. We then aggregated scores for salience classification for both inmates/detainees/residents and employees.
- 4. Reporting.** This step involved compiling final salient rights for both inmates/detainees/residents and employees to be incorporated into the ESG report.

Topic Identification

GEO used the framework established by the United Nations Guiding Principles on Business and Human Rights as the foundation upon which it developed this due diligence program.

The process draws on the following foundational sources of international human rights:

- United Nations (UN) Universal Declaration of Human Rights
- UN International Covenant on Civil and Political Rights
- UN International Covenant on Economic, Social and Cultural Rights
- International Labour Organization (ILO) Fundamental Principles and Rights at Work

Additionally, based on the nature of GEO's facilities and services, the following international treaties and UN guidance were considered as part of this assessment:

- UN Standard Minimum Rules for the Treatment of Prisoners (the Nelson Mandela Rules)
- United Nations High Commissioner for Refugees (UNHCR) Detention Guidelines
- Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (UNCT)
- Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)
- Convention on the Rights of the Child
- Convention on the Rights of Persons with Disabilities

Based on these instruments, GEO identified a list of potentially salient human rights topics.

Potentially Salient Human Rights Topics

(Please refer to page 7 for a description of each human right)

• Asylum • Civil/Political • Cultural/Economic/Social • Labor • Property • Security

- Right to seek asylum from persecution
- Right to humane and dignified conditions of detention
- Right to special attention for victims of trauma and torture, victims of trafficking
- Right to freedom of assembly (employees only)
- Right to equality before the law and equal protection of the law
- Right to a fair and public hearing by an independent and competent tribunal
- Right to be considered innocent until proven guilty
- Right of protection of the family and the right to marry
- Right to participate in public life
- Right of protection for the child
- Right of persons with disabilities (physical and/or mental)
- Right to accessibility
- Right to suitable clothing
- Right to exercise
- Right to contact with the outside world
- Right to freedom of thought, conscience and religion
- Right to suitable food
- Right to privacy
- Right to equality and freedom from discrimination
- Right to freedom of opinion and expression
- Right to education
- Right to take part in cultural life, to benefit from scientific progress, and to protection of the material and moral rights of authors and inventors
- Right to gender equality and equal remuneration
- Right to healthcare
- Right to protect Indigenous Peoples' cultural values and practices
- Right to social security, including social insurance
- Right to parental leave
- Right to adequate conditions of living
- Right to form and join trade unions
- Right not to be subjected to slavery, servitude or forced labor
- Right to work
- Right to rest and leisure
- Right to own property
- Right to personal records
- Right to be free from arbitrary arrest, detention and exile
- Right to separation of categories
- Right to liberty and security of the person
- Right not to be subjected to torture, cruel, inhumane and/or degrading treatment or punishment

Stakeholder Interviews

GEO conducted 26 interviews with internal and external stakeholders to gain a wide view on potentially salient human rights.

Internal stakeholders included members of GEO's Board of Directors, executive leadership and division heads, other senior leaders, subject matter experts, and frontline employees.

The external stakeholders we engaged included former GEO inmates/Continuum of Care alumni, multiple representatives of GEO shareholders,

including institutional investors and members of the Interfaith Center on Corporate Responsibility (ICCR), and two Community Advisory Boards (CABs) in Indiana and Louisiana. The CABs, discussed in more detail in the Engaging Stakeholders chapter, include representatives of local religious, civic, and educational organizations, government agencies, and interested citizens. Representatives from all of these groups participated in the interviews.

DETERMINATION AND SCORING OF SALIENT HUMAN RIGHTS

Building on the saliency methodology, the topics were then ranked. This determined the most important, or salient, human rights for both inmates/detainees/residents and employees considering the interviews conducted, research, and a scan of relevant media coverage.

We ranked those human rights in the order of saliency from Very High to Low:

- Very high
- High
- Moderate
- Low

Salient Inmate/Detainee/Resident Rights

Salient inmate/detainee/resident rights were identified, scored, and grouped in six different categories, including: asylum, civil/political, cultural/economic/social, labor, property, and security. The following chart illustrates the inmate/detainee/resident rights in the “very high,” “high,” and “moderate” categories.

Ranking	Very High	High	Moderate
Asylum	<ul style="list-style-type: none"> • Right to humane and dignified conditions of detention 		<ul style="list-style-type: none"> • Right to special attention for victims of trauma and torture, victims of trafficking
Civil/Political	<ul style="list-style-type: none"> • Right to equality and freedom from discrimination • Right to healthcare 	<ul style="list-style-type: none"> • Right to suitable food • Right to contact with the outside world 	<ul style="list-style-type: none"> • Right to freedom of opinion and expression • Right to freedom of thought, conscience and religion
Cultural/Economic/Social	<ul style="list-style-type: none"> • Right to adequate conditions of living 		<ul style="list-style-type: none"> • Right to protect Indigenous Peoples' cultural values and practices
Labor			<ul style="list-style-type: none"> • Right not to be subjected to slavery, servitude or forced labor
Property			<ul style="list-style-type: none"> • Right to personal records
Security	<ul style="list-style-type: none"> • Right to liberty and security of the person • Right not to be subjected to torture, cruel, inhumane and/or degrading treatment or punishment 		<ul style="list-style-type: none"> • Right to separation of categories

Salient Employee Rights

These rights were grouped into four categories: civil/political, cultural/economic/social, labor, and security. The following chart illustrates the employee rights in the “very high,” “high,” and “moderate” categories.

Ranking	Very High	High	Moderate
Civil/Political		<ul style="list-style-type: none"> • Right to equality and freedom from discrimination • Right to privacy 	<ul style="list-style-type: none"> • Right to freedom of opinion and expression
Cultural/Economic/Social		<ul style="list-style-type: none"> • Right to adequate conditions of living 	<ul style="list-style-type: none"> • Right to parental leave • Right to social security, including social insurance
Labor	<ul style="list-style-type: none"> • Right to rest and leisure 		<ul style="list-style-type: none"> • Right to work
Security	<ul style="list-style-type: none"> • Right to liberty and security of the person 	<ul style="list-style-type: none"> • Right not to be subjected to torture, cruel, inhumane and/or degrading treatment or punishment 	

Human Rights Potential Risks Considered Low

The rights listed below were considered low potential risks both for inmates/detainees/residents and employees.

• Asylum
 • Civil/Political
 • Cultural/Economic/Social
 • Labor
 • Property
 • Security

- **Right to seek asylum from persecution**
- **Right to freedom of assembly (employees only)**
- **Right to equality before the law and equal protection of the law**
- **Right to a fair and public hearing by an independent and competent tribunal**
- **Right to be considered innocent until proven guilty**
- **Right of protection of the family and the right to marry**
- **Right to participate in public life**
- **Right of protection for the child**
- **Right of persons with disabilities (physical and/or mental)**
- **Right to accessibility**
- **Right to suitable clothing**
- **Right to exercise**
- **Right to education**
- **Right to take part in cultural life, to benefit from scientific progress, and to protection of the material and moral rights of authors and inventors**
- **Right to gender equality and equal remuneration**
- **Right to form and join trade unions**
- **Right to own property**
- **Right to be free from arbitrary arrest, detention and exile**

The identified salient human rights represent current evaluations by GEO and are subject to potential change in the future. The company will continue to evaluate potential human rights risks through monitoring and stakeholder engagement.

HUMAN RIGHTS AWARENESS AND EMPLOYEE TRAINING

Meeting American Correctional Association Training Standards

We reinforce, promote and support our commitment to respect human rights through company-wide awareness and training programs. All new GEO employees — including our facility and program staff who work directly with the 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 geogroup.com/Human-Rights-Training.pdf.

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 independent standards set by the American Correctional Association (ACA). The training encompasses a minimum of 120 hours within the staff member's first year of employment and 40 hours of recurring training during each consecutive year of employment.

Contractor and Third Party Training

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

While GEO does not use contract security providers at any of our operations or facilities, our policies and training would also apply to these groups if we were ever to engage with them.

PLANS AND OBJECTIVES

The identification and scoring of salient human rights both for inmates/detainees/residents and employees provide a framework for reviewing GEO's Global Human Rights Policy, making necessary adjustments and fostering continuous improvement.

In the next phase of our activity, GEO will carefully evaluate and update its Global Human Rights Policy and training. We will also continue to engage with our stakeholders for their valuable input on this and all of our human rights initiatives.



DESCRIPTIONS OF POTENTIALLY SALIENT HUMAN RIGHTS TOPICS

Rights Category	Human Rights	Description
Asylum	Right to seek asylum from persecution	Everyone has the right to seek and to enjoy in other countries asylum from persecution. This right may not be invoked in the case of prosecutions genuinely arising from non-political crimes or from acts contrary to the purposes and principles of the United Nations.
Asylum	Right to humane and dignified conditions of detention	Conditions of detention must be humane and dignified. If detained, asylum-seekers should be treated with dignity and in accordance with international standards.
Asylum	Right to special attention for victims of trauma and torture, victims of trafficking	Because of the experience of seeking asylum, and the often traumatic events precipitating flight, asylum-seekers may present with psychological illness, trauma, depression, anxiety, aggression, and other physical, psychological and emotional consequences. Victims of torture and other serious physical, psychological or sexual violence also need special attention and should generally not be detained.
Civil / Political	Right to freedom of assembly (employees only)	Everyone has the right to freedom of peaceful assembly and association. No one may be compelled to belong to an association.
Civil / Political	Right to equality before the law and equal protection of the law	All are equal before the law and are entitled without any discrimination to equal protection of the law. All are entitled to equal protection against any discrimination in violation of this Declaration and against any incitement to such discrimination.
Civil / Political	Right to a fair and public hearing by an independent and competent tribunal	Everyone is entitled in full equality to a fair and public hearing by an independent and impartial tribunal, in the determination of their rights and obligations and of any criminal charge against them.
Civil / Political	Right to be considered innocent until proven guilty	Everyone charged with a penal offence has the right to be presumed innocent until proved guilty according to law in a public trial at which he/she/they had all the guarantees necessary for their defense. No one shall be held guilty of any penal offence on account of any act or omission which did not constitute a penal offence, under national or international law, at the time when it was committed. Nor shall a heavier penalty be imposed than the one that was applicable at the time the penal offence was committed.
Civil / Political	Right of protection of the family and the right to marry	People of full age, without any limitation due to race, nationality or religion, have the right to marry and to found a family. They are entitled to equal rights as to marriage, during marriage and at its dissolution. Marriage shall be entered into only with the free and full consent of the intending spouses.
Civil / Political	Right to participate in public life	Everyone has the right to take part in the government of their country, directly or through freely chosen representatives. Everyone has the right to equal access to public service in their country. The will of the people shall be the basis of the authority of government; this will shall be expressed in periodic and genuine elections which shall be by universal and equal suffrage and shall be held by secret vote or by equivalent free voting procedures.
Civil / Political	Right of protection for the child	The child shall be registered immediately after birth and shall have the right from birth to a name, the right to acquire a nationality and, as far as possible, the right to know and be cared for by their parents. States Parties undertake to respect the right of the child to preserve their identity, including nationality, name and family relations as recognized by law without unlawful interference. States Parties shall ensure that a child shall not be separated from their parents against their will, except when competent authorities subject to judicial review determine, in accordance with applicable law and procedures, that such separation is necessary for the best interests of the child. The minimum age for admission to any type of employment or work which by its nature or the circumstances in which it is carried out is likely to jeopardise the health, safety or morals of young persons shall not be less than 18 years.
Civil / Political	Right of persons with disabilities (physical and/or mental)	Ensure and promote the full realization of all human rights and fundamental freedoms for all persons with disabilities without discrimination of any kind on the basis of disability.

Rights Category	Human Rights	Description
Civil / Political	Right to accessibility	Everyone has the right to participate fully in all aspects of life. Private entities must ensure minimum standards and guidelines are met to fulfill this right. States Parties shall take effective measures to ensure personal mobility with the greatest possible independence for persons with disabilities
Civil / Political	Right to suitable clothing	Every prisoner who is not allowed to wear their own clothing shall be provided with an outfit of clothing suitable for the climate and adequate to keep him/her/ them in good health. Such clothing shall in no manner be degrading or humiliating.
Civil / Political	Right to exercise	Every prisoner who is not employed in outdoor work shall have at least one hour of suitable exercise in the open air daily if the weather permits.
Civil / Political	Right to contact with the outside world	Prisoners shall be allowed, under necessary supervision, to communicate with their family and friends at regular intervals by corresponding in writing and using, where available, telecommunication, electronic, digital and other means; and by receiving visits. Where conjugal visits are allowed, this right shall be applied without discrimination.
Civil / Political	Right to freedom of thought, conscience and religion	Everyone has the right to freedom of thought, conscience and religion; this right includes freedom to change one's religion or belief, and freedom, either alone or in community with others and in public or private, to manifest their religion or belief in teaching, practice, worship and observance.
Civil / Political	Right to suitable food	Every prisoner shall be provided by the prison administration at the usual hours with food of nutritional value adequate for health and strength, of wholesome quality and well prepared and served. Drinking water shall be available to every prisoner whenever he/she/they need it.
Civil / Political	Right to privacy	No one shall be subjected to arbitrary interference with their privacy, family, home or correspondence, nor to attacks upon their honour and reputation. Everyone has the right to the protection of the law against such interference or attacks.
Civil / Political	Right to equality and freedom from discrimination	All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood. This includes freedom from discrimination based on race, color, religion or creed, national origin or ancestry, citizenship, sex (including sexual orientation, gender, gender identity, pregnancy, child birth, breast feeding, parental leave), age, physical or mental disability, veteran status, or any other protected class.
Civil / Political	Right to freedom of opinion and expression	Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers.
Cultural / Economic / Social	Right to education	Everyone has the right to education. Education shall be free, at least in the elementary and fundamental stages. Elementary education shall be compulsory. Technical and professional education shall be made generally available and higher education shall be equally accessible to all on the basis of merit. Education shall be directed to the full development of the human personality and to the strengthening of respect for human rights and fundamental freedoms. It shall promote understanding, tolerance and friendship among all nations, racial or religious groups, and shall further the activities of the United Nations for the maintenance of peace. Parents have a prior right to choose the kind of education that shall be given to their children.
Cultural / Economic / Social	Right to take part in cultural life, to benefit from scientific progress, and to protection of the material and moral rights of authors and inventors	Everyone has the right freely to participate in the cultural life of the community, to enjoy the arts and to share in scientific advancement and its benefits. Everyone has the right to the protection of the moral and material interests resulting from any scientific, literary or artistic production of which he/she/they are the author.
Cultural / Economic / Social	Right to gender equality and equal remuneration	States Parties shall take in all fields, in particular in the political, social, economic and cultural fields, all appropriate measures, including legislation, to ensure the full development and advancement of all peoples, for the purpose of guaranteeing them the exercise and enjoyment of human rights and fundamental freedoms on a basis of equality with cis-gendered men. Each Member shall, by means appropriate to the methods in operation for determining rates of remuneration, promote and, in so far as is consistent with such methods, ensure the application to all workers of the principle of equal remuneration for work of equal value.

Rights Category	Human Rights	Description
Cultural / Economic / Social	Right to healthcare	The States Parties recognize the right of everyone to the enjoyment of the highest attainable standard of physical and mental health.
Cultural / Economic / Social	Right to protect Indigenous Peoples' cultural values and practices	Right to recognition and protection of social, cultural and spiritual values and practices.
Cultural / Economic / Social	Right to social security, including social insurance	Everyone, as a member of society, has the right to social security and is entitled to realization, through national effort and international co-operation and in accordance with the organization and resources of each State, of the economic, social and cultural rights indispensable for their dignity and the free development of their personality.
Cultural / Economic / Social	Right to parental leave	Special protection should be accorded to mothers/ fathers/people during a reasonable period before and after childbirth. During such period, working mothers/ fathers/people should be accorded paid leave or leave with adequate social security benefits.
Cultural / Economic / Social	Right to adequate conditions of living	Everyone has the right to a standard of living adequate for the health and well-being of himself and of their family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond their control. Motherhood and childhood are entitled to special care and assistance.
Labor	Right to form and join trade unions	Everyone has the right to form and to join trade unions for the protection of their interests.
Labor	Right not to be subjected to slavery, servitude or forced labor	No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms.
Labor	Right to work	Everyone has the right to work, to free choice of employment, to just and favorable conditions of work and to protection against unemployment. Everyone, without any discrimination, has the right to equal pay for equal work. Everyone who works has the right to just and favorable remuneration ensuring for themselves and their family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection.
Labor	Right to rest and leisure	Everyone has the right to rest and leisure, including reasonable limitation of working hours and periodic holidays with pay.
Property	Right to own property	Everyone has the right to own property alone as well as in association with others. No one shall be arbitrarily deprived of their property.
Property	Right to personal records	There shall be a standardized prisoner file management system in every place where persons are imprisoned. All records shall be kept confidential and made available only to those whose professional responsibilities require access to such records. Every prisoner shall be granted access to the records pertaining to him/her/they, subject to redactions authorized under domestic legislation, and shall be entitled to receive an official copy of such records upon release.
Security	Right to be free from arbitrary arrest, detention and exile	No one shall be subjected to arbitrary arrest, detention or exile.
Security	Right to separation of categories	The different categories of prisoners shall be kept in separate institutions or parts of institutions, taking account of their sex, age, criminal record, the legal reason for their detention and the necessities of their treatment. This right requires detention authorities to take special measures for the protection of detainees (such as separating juveniles from other detainees).
Security	Right to liberty and security of the person	Everyone has the right to life, liberty and the security of person. This includes safe and healthy working conditions for employees.
Security	Right not to be subjected to torture, cruel, inhumane and/or degrading treatment or punishment	No one shall be subjected to torture or to cruel, inhumane or degrading treatment or punishment. Each State Party shall ensure that all acts of torture are offences under its criminal law. The same shall apply to an attempt to commit torture and to an act by any person which constitutes complicity or participation in torture.