



**The GEO Group, Inc. ®**



**Vendor Code of Conduct**





The GEO Group, Inc. and its subsidiaries (collectively, "The GEO Group") owes its success to its employees, clients, investors, and business partners who have placed their trust in us. The GEO Group conducts its business operations with honesty, integrity, and respect and demonstrates a commitment to legal, ethical, safe, fair and environmentally responsible business practices. The GEO Group expects its vendors to embrace our commitment to these values by complying with all applicable laws and regulations, and by acting with these same values at all times.

This Vendor Code of Conduct ("Code") applies to all individuals, companies, and business partnerships that are engaged to provide goods or services to The GEO Group. As a vendor of The GEO Group, you are expected to act in accordance with this Code, including aligning guidelines, policies and practices, and communicating and ensuring that this Code is adhered to by you and your employees, agents, subcontractors, and others acting on your behalf, while conducting business with or on behalf of The GEO Group.

The guidelines, policies and practices articulated below reflect The GEO Group's standards and commitments. To the fullest extent permitted by law, we expect our vendors to share these standards and commitments and adhere to these expectations.

#### **Legal and Regulatory Compliance Practices:**

The GEO Group is committed to obeying the law wherever it conducts business. As our vendor, you are expected to comply with all federal, state, and local laws and regulations applicable to your business and the rendering of services to The GEO Group.

**Employment and the Workplace:** The GEO Group strives to maintain a secure work environment in which people are treated fairly, with dignity and respect. We expect our workplaces to be free from discrimination, harassment, drugs, and violence. As our vendor, we expect you to support these workplace goals in the following ways:





**Wage and Benefits:** At a minimum, you should pay workers regularly and timely, the legal minimum wage, the prevailing industry wage, or the wage negotiated in an applicable collective bargaining agreement, whichever is higher. All other types of legally mandated benefits must be provided to your employees as required by law.

**Working Hours:** Your employees should not be expected to work in excess of the relevant legal limits on working hours, overtime hours and number of working days per week. Additionally, your workers should be granted and correctly compensated for any types of paid leave or time off to which they are legally entitled to receive under applicable law.

**Fair Labor Practices:** You must not engage in any unlawful labor practices and must respect the rights granted to your personnel under applicable labor and employment laws, such as the National Labor Relations Act and federal and state wage and hour laws.

**No Discrimination:** You must not engage in unlawful discrimination against your employees, agents, subcontractors, and others acting on your behalf, or against employees, agents, or contractors of The GEO Group. We expect you to engage in Equal Employment Opportunity Commission practices and to make all employment decisions based on legitimate, non-discriminatory business reasons and without regard to protected characteristics such as race, ethnicity, color, gender, religion, age, national origin, political affiliation, union membership, national origin, disability, veteran status, sexual orientation, gender identity or expression, marital or pregnancy status, ancestry, or citizenship status.

**Forced Labor and Human Trafficking:** We condemn forced labor, whether in the form of indentured labor, bonded labor, prison labor, and human trafficking and will not knowingly work with suppliers who engage in these practices. All workers have the right to engage in work willfully, without surrendering identification and without the payment of fees. Workers have the right to freedom of movement and our suppliers must ensure it is afforded to them. Suppliers must also procure their raw materials and/or components for The GEO Group products solely from sources that do not utilize forced labor or engage in human trafficking.

**No Harassment:** You must not engage in behavior that is harassing, intimidating, or otherwise creates a hostile or offensive work environment. This applies not only with respect to your employees, agents, subcontractors, and others acting on your behalf who perform services on behalf of The GEO Group, but also to The GEO Group's employees, agents, contractors, and any other individuals your personnel may encounter or interact with in the course of providing services. Examples of harassing and intimidating behavior include: unwanted physical contact; displaying offensive material or telling offensive

jokes; threats of termination or lost opportunity based on race, ethnicity, color, gender, religion, age, national origin, political affiliation, union membership, national origin, disability, veteran status, sexual orientation, gender identity or expression, marital or pregnancy status, ancestry, or citizenship status; conduct of a sexual, racial, or other nature that interferes with someone's work performance or creates an intimidating, hostile, or offensive work environment; and threatened or actual violence.

Furthermore, The GEO Group does not tolerate violent or threatening behavior. While performing services for The GEO Group, your personnel may not engage in or threaten violent conduct or bring dangerous weapons or substances to any GEO Group workplace location or off-site company function.

**Child Labor:** The use of child labor is prohibited. You must not employ child labor and should take the necessary precautions to ensure that you do not employ anyone under the applicable legal minimum age for employment. Vendors must comply with applicable laws regulating the use of minors.

**Human Rights:** The GEO Group believes in protecting human rights. You should uphold the principles of the Universal Declaration of Human Rights (UDHR), the United Nations Guiding Principles on Business and Human Rights (UNGPs), and the International Labor Organization (ILO) Core Conventions for your employees and your own suppliers. The GEO Group expects you to uphold the following rights: preservation of freedom, protection of equality, non-discrimination, eradication of slavery and torture, equality before the law, no unfair detainment, right to a trial, presumption of innocence, right to privacy, freedom of movement, and the right to belong to a country. The GEO Group's position is reflected in its [Human Rights and ESG Report](#).



**Whistleblowing:** You must have policies and procedures allowing your employees to raise genuine concerns about legal or ethical issues occurring in your company. This grievance mechanism should be transparent and understandable to your employees. The GEO Group expects that you will provide the requisite support, including anonymity, to your whistleblowers and that your whistleblowers will not be subject to harassment or retribution.

**Diversity, Equality and Inclusion:** The GEO Group expects that you will promote diversity and inclusion, and will not discriminate on the basis of race, ethnicity, color, gender, religion, age, national origin, political affiliation, union membership, national origin, disability, veteran status, sexual orientation, gender identity or expression, marital or pregnancy status, ancestry, or citizenship status.

**Gifts, Travel and Entertainment:** You must not provide lavish or otherwise inappropriate gifts, favors, other compensation, including travel and entertainment, that are intended to influence, or may appear to influence, a business decision.



**Animal Welfare:** We believe in the humane treatment of animals and expect suppliers engage in practices that promote the welfare of animals. This includes providing an environment that is free from distress, cruelty, abuse, and neglect and that is consistent with all applicable laws and industry guidelines.



**Security:** While performing services on site at any of The GEO Group's offices, you and your personnel must comply with The GEO Group's badging, parking, security policies and our client's security requirements.

**Background Investigations:** It is important to The GEO Group to comply with Federal and State laws prohibiting individuals who have been convicted of certain crimes to gain entry into GEO's secure facilities. Accordingly, we expect our vendors to appropriately screen personnel assigned to perform services for The GEO Group. Additionally, we expect vendors to abide by all required background checks of their employees by our clients.

**Privacy and Information Protection:** You and your personnel must keep confidential, proprietary, and sensitive information private and secure at all times. Your specific duties and obligations with

respect to privacy and information protection will be set forth in your contracts with The GEO Group.

**Accuracy of Records:** You must keep complete and accurate records of all matters related to your business with The GEO Group, including financial records. You must never tamper with, manipulate, alter, or conceal any business record and must never make a false or misleading entry on any record or report. Your practices must conform to the industry rules and standards for maintaining and retaining records.

**Integrity in the Marketplace/Business Practices:** The GEO Group's reputation for integrity is critical to our ability to develop and sustain trust with our clients, employees, and business partners. Our reputation for integrity depends, in part, on the integrity of our vendors. You must compete fairly, act with integrity in financial transactions, carefully and accurately report financial information, and refrain from any improper or unlawful business practices. The following provisions, which apply to our employees, also apply to our vendors and their personnel:

**AML/OFAC:** As a vendor, you must never knowingly facilitate or participate in any money laundering, terrorist financing, or other financial criminal activity. If you suspect any suspicious activity, The GEO Group expects you to promptly report any such suspicious activity. You must also respect the U.S. government's policies on trade sanctions, and comply with the U.S. trade sanction program.

**Anti-Bribery/Anti-Corruption:** You must not participate in bribes or kickbacks of any kind, whether in dealings with public officials or individuals in the private sector. You must comply with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act, as well as laws governing lobbying, gifts and payments to public officials, political campaign contribution laws, and other related regulations.



**Government Contracts:** Vendors working directly or indirectly on government contracts must be aware of and comply with all the terms of the government contract and act with care in their relationship with the government. You should never engage in activity that could be perceived as an attempt to improperly influence government officials or employees, or to obtain or reward favorable treatment by government officials or employees. You must not offer gifts, entertainment, meals, or anything of value to a government employee without first consulting with The GEO Group.

**Environment/Sustainability:** The GEO Group is committed to sustainable practices and strives to use resources wisely and protect our natural environment. We expect that our vendors will comply with all relevant environmental laws and regulations, and our vendors are encouraged to reduce waste and conserve energy. The GEO Group's position is reflected in its [Human Rights and ESG Report](#).

**Reporting Potential Violation of This Code:**

Any individual with knowledge of an actual or potential violation of the terms and conditions of this Code or any applicable laws and regulations in connection with work performed for The GEO Group must report this knowledge to their primary business contact, or, alternatively, contact The GEO Group's ethics hotline at 866-568-5425. The GEO Group strictly enforces its non-retaliation policy, which protects those who, in good faith, report suspected wrongdoing. Likewise, we expect that you will not engage in retaliation against your personnel, who, in good faith, report potential violations of the law, potential violations of this Code, or any other alleged wrongdoing.