

	<p align="center">CORPORATE POLICY & PROCEDURE MANUAL</p> <p>CHAPTER: 01 - General Administration</p> <p>TITLE: 1.1.15 Code of Business Conduct and Ethics (previously 3.2.1)</p>	<p><u>NUMBER:</u> 1.1.15 (formerly 3.2.1)</p> <p><u>SUPERSEDES:</u> 9/14/16</p> <p><u>EFFECTIVE:</u> 2/25/25</p>
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POLICY

This Code of Business Conduct and Ethics covers a wide range of business practices and procedures. This Code applies to all of The GEO Group, Inc.'s and its subsidiaries' (collectively, "GEO" or the "Company") directors, officers, employees, agents, representatives, and consultants ("you"). It does not cover every issue that may arise, but it sets out basic guidance principles. You must conduct yourself accordingly and avoid even the appearance of improper behavior. This Code strives to deter wrongdoing and 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 the applicable government and self-regulatory organization laws, rules and regulations
- Promote the protection of GEO assets
- Promote fair dealing practices
- Prompt internal reporting of Code violations
- Accountability for compliance with the Code

If a law conflicts with a policy in this Code, you must comply with the law. If you have any questions about these conflicts, you should direct those questions to GEO's Legal Department. Those who violate the standards in this Code will be subject to disciplinary action, up to and including termination of employment. If you are in a situation which you believe may violate or lead to a violation of this Code, follow the guidelines described in Section 22 of this Code.

GUIDELINES

GEO's policy is to promote high standards of integrity by conducting its affairs honestly and ethically and in compliance with applicable law. You must act in compliance with applicable law and with integrity and observe the highest ethical standards of business conduct in your dealings with the Company's customers, suppliers, partners, service providers, competitors, employees and anyone else with whom you have contact in the course of performing your work.

1. Compliance with Laws, Rules and Regulations

Obeying the law, both in letter and in spirit, is the foundation on which GEO's ethical standards are built. You must respect and obey the laws of the cities, states and countries in which we operate.

From time to time, GEO will hold information and training sessions to promote compliance with laws, rules and regulations, including insider-trading laws.¹

2. Conflicts of Interest

A "conflict of interest" exists when a person's private interest interferes or even appears to interfere in any way with the interests of GEO as a whole. You are not permitted to engage in any business or conduct or enter into any agreement or arrangement that would give rise to actual or potential conflicts of interest. Further, you should not permit yourself to be placed in a position that might give rise to the appearance that a conflict of interest has arisen.

A conflict situation can arise when you, or members of your family, take actions or have interests that may make it difficult to perform your work objectively and effectively. Conflicts of interest may also arise when you, or members of your family, receive improper personal benefits as a result of your position at GEO. A conflict of interest is deemed to exist whenever, as a result of the nature or responsibilities of your relationship with GEO, you are in a position to further any personal financial interest or the financial interest of any member of your family. For example, loans to, or guarantees of obligations of, employees and their family members may create conflicts of interest.

It is almost always a conflict of interest for a GEO employee to work simultaneously for a competitor, customer or supplier. Employees are not permitted to work for a competitor as a consultant or board member. Unless approved in advance by senior management and GEO's Legal Department, employees may not, while you are an employee of GEO, be a supplier to GEO, represent a supplier to GEO, work for a supplier to GEO, or be a member of the board of directors/managers for a supplier to GEO. Employees should avoid any direct or indirect business connection with our customers, suppliers or competitors, except on our behalf. Employees may not have a financial interest in any organization if that interest would create or give the appearance of a conflict of interest with GEO. Such organizations include suppliers, vendors, clients, competition partners and others with which GEO does business. If an employee has any direct or indirect involvement in deciding whether GEO does business with an organization, he or she should not obtain or maintain a financial interest in that organization. Conflicts of interest are prohibited as a matter of GEO policy, except under guidelines approved by the Board of Directors.

Conflicts of interest may not always be clear-cut. As such, if you have a question, you should consult with GEO's Legal Department. Directors and executive officers should seek determinations and prior authorizations or approvals, as applicable, of potential conflicts of

¹ *K&S Note to Draft:* Company to confirm whether this remains true.

interest exclusively from the Audit and Finance Committee of GEO in accordance with GEO policy. If you become aware of a conflict or potential conflict, you should bring it to the attention of GEO's Legal Department.

3. Insider Trading

If you have material, non-public information relating to GEO or its business, it is GEO's policy that you, and your family members, or any entities controlled by any of them, may not buy or sell securities, as well as derivative securities relating to any of GEO's securities, of GEO or engage in any other action to take advantage of, or pass on to others, that information. Information is material when it could affect someone's decision to buy, hold or sell a company's securities. This policy also applies to trading in the securities of any other company, including but not limited to our customers, suppliers, vendors or other business partners, if you have material, non-public information about that company which you obtained by virtue of your position at GEO.

Transactions that may be necessary or justifiable for independent reasons, including emergency expenditures and transactions planned before you learned the material information, are not exceptions. Even the appearance of an improper transaction must be avoided to prevent any potential prosecution of GEO or the individual trader.

All non-public information about GEO should be considered confidential information. To use non-public information for personal financial benefit or to "tip" others who might make an investment decision on the basis of this information is not only unethical but also illegal. In order to assist with compliance with laws against insider trading, GEO has adopted a specific policy called Securities Trades by Company Personnel governing trading in securities of GEO by directors, officers and employees. If you have any questions, please consult GEO's Legal Department.

4. Corporate Opportunities

You are prohibited from (a) taking for yourself personally, for entities you own a significant interest in, for immediate family members, or for someone with whom you have a close personal relationship with, opportunities that are discovered through the use of corporate assets, property, information or position without the consent of the Board of Directors and from (b) engaging in a potential transaction or matter that may be an investment or business opportunity or prospective economic or competitive advantage in which GEO could reasonably have an interest or expectancy. No employee may use corporate assets, property, information, or position for improper personal gain, and no employee may directly or indirectly compete with GEO. You owe a duty to GEO to advance its legitimate interests when the opportunity to do so arises.

5. Competition and Fair Dealing

We seek to outperform our competition fairly and honestly. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing

such disclosures by past or present employees of other companies is prohibited. You should endeavor to respect the rights of and deal fairly with GEO's customers, suppliers, partners, service providers, competitors and employees. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice.

No gift or entertainment should ever be offered, given, provided or accepted by any GEO employee, family member of an employee or agent unless it satisfies the requirements of GEO's Gift Policy and does not violate any applicable laws or regulations. Please discuss with GEO's Legal Department any gifts or proposed gifts that you are not certain are appropriate.

6. Discrimination and Harassment

GEO is committed to providing employment opportunities and making employment decisions without regard to any characteristics protected under applicable federal, state, and local laws. We are firmly committed to providing equal opportunity in all aspects of employment and do 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.

You 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.

7. Health and Safety

GEO is committed to conducting its business in compliance with applicable health and safety laws and regulations in a manner that has high regard for the health and safety of human life. 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 not permitted. Employees should report to work in the condition to perform their duties, free from the influence of alcohol, illegal drugs or other controlled substances. The use of illegal drugs in the workplace will not be tolerated.

8. Record-Keeping



GEO requires honest and accurate recording and reporting of information in order to make responsible business decisions. For example, only the true and actual number of hours worked should be reported.

Many employees regularly use business expense accounts, which must be documented and recorded accurately. If you are not sure whether a certain expense is legitimate, ask your controller or GEO's Legal Department.

All of GEO's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect GEO's transactions and must conform both to applicable legal requirements and to GEO's system of internal controls. Unrecorded or "off the books" funds or assets should not be maintained unless permitted by applicable law or regulation.

Business records and communications often become public, and you should avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies that can be misunderstood. This applies equally to e-mail, internal memos, and formal reports. Records should always be retained or destroyed according to GEO's record retention policies. In accordance with those policies, in the event of litigation or governmental investigation, please consult GEO's Legal Department.

9. Confidentiality

You must maintain the confidentiality of confidential information entrusted to you by GEO or its customers, suppliers or partners except when disclosure is authorized by the Legal Department or required by laws or regulations. Confidential information includes all non-public information that might be of use to competitors, or harmful to GEO or its customers, suppliers and partners if disclosed. Confidential information also includes materials provided and information discussed at meetings of the Board of Directors or any committee thereof. The obligation to preserve confidential information continues after employment or agency with GEO ends.

10. Protection and Proper Use of GEO Assets

You should endeavor to protect GEO's assets and ensure their efficient use for legitimate business purposes. Theft, carelessness, and waste have a direct impact on GEO's profitability. Any suspected incident of fraud or theft should be immediately reported for investigation. Company equipment should not be used for non-GEO business, though incidental personal use may be permitted.

The obligation to protect GEO's assets includes its proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports. Unauthorized possession, use or distribution of this information would violate GEO policy. It could also be illegal and result in civil or even criminal penalties.

11. Government Contracting

Employees and officers must comply fully with all applicable foreign, federal, state and local laws regulating government contracting. Employees and officers must comply with federal and state employment laws applicable to federal or state contractors, such as federal Equal Employment Opportunity and state human rights laws, and various federal and state laws prohibiting discrimination against certain protected classes of people.

12. Filing of Government Reports

Any reports or information provided, on our behalf, to federal, state, local or foreign governments should be true, complete and accurate. Any omission, misstatement or lack of attention to detail could result in a violation of the reporting laws, rules and regulations.

13. Improper Payments and Gifts

GEO requires full compliance with the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, and the Australia Crimes Legislation Amendment (Combatting Foreign Bribery) Act 2024 by all of its employees, consultants, and agents. These laws prohibit giving anything of value, directly or indirectly, including facilitation payments, to officials of foreign governments or foreign political candidates in order to obtain or retain business. It is strictly prohibited to make illegal payments to government officials of any country.

In addition, the U.S. government has a number of laws and regulations regarding business gratuities which may be accepted by U.S. government personnel. The promise, offer or delivery to an official or employee of the U.S. government of a gift, favor or other gratuity in violation of these rules would not only violate GEO policy but could also be a criminal offense. State and local governments, as well as foreign governments, may have similar rules.

GEO prohibits improper payments in all of its activities, whether these activities are with governments or in the private sector. If you receive any offer of money or gifts that is intended to influence a business decision, then it should be reported to GEO's Legal Department immediately. GEO's Legal Department can provide guidance to you in this area.

14. Fair Competition and Dealing

You should never use any illegal or unethical methods to gather competitive information. You must comply with both the letter and the spirit of the antitrust and competition laws in all of the jurisdictions where GEO does business. You must not engage in conduct that unfairly prevents or limits competition, that unfairly restrains trade or attempts to improperly gain market share, that improperly colludes with another competitor, or that could appear to engage in any of such conduct.

15. Political Contributions

GEO prohibits making any use of GEO, personal or other funds or resources on behalf of GEO for political and other purposes which are improper or prohibited by the applicable federal, state, local or foreign laws, rules or regulations. GEO contributions or expenditures in connection with election campaigns will be permitted where allowed by federal, state, local or foreign election laws, rules and regulations. You are encouraged to participate actively in the political process. We believe that individual participation is a continuing responsibility of those who live in a free state.

16. Accounting Policies and Disclosure

You are prohibited from directly or indirectly falsifying or causing to be false or misleading any financial or accounting book, record or account. You are expressly prohibited from directly or indirectly manipulating an audit, and from destroying or tampering with any record, document or tangible object with the intent to obstruct a pending or contemplated audit, review or federal investigation. The commission of, or participation in, one of these prohibited activities or other illegal conduct will subject the perpetrator to federal penalties, as well as punishment of up to and including termination of employment.

You may not (1) directly or indirectly make or cause to be made a materially false or misleading statement, or (2) omit to state, or cause another person to omit to state, any material fact necessary to make statements made not misleading in connection with the audit of financial statements by independent accountants, the preparation of any required reports whether by independent or internal accountants, or any other work which involves or relates to the filing of a document with the Securities and Exchange Commission (SEC).

GEO's periodic reports and other documents filed with the SEC, including all financial statements and other financial information, must comply with applicable federal securities laws and SEC rules. Each person who is involved in GEO's disclosure process must: (1) be familiar with and comply with GEO's disclosure controls and procedures and its internal control over financial reporting; (2) take all necessary steps to ensure that all filings with the SEC and all other public communications about the financial and business condition of GEO provide full, fair, accurate, timely and understandable disclosure.

17. Reporting any Illegal or Unethical Behavior

Actions prohibited by this Code involving directors or executive officers must be reported to the Audit and Finance Committee. Actions prohibited by this Code involving any other person must be reported to the Office of Professional Responsibility. After receiving a report of an alleged prohibited action, the Audit and Finance Committee or the Office of Professional Responsibility must promptly take all appropriate actions necessary to investigate. Employees are encouraged to talk to GEO's Legal Department about observed illegal or unethical behavior and when in doubt about the best course of action in a particular situation. You are expected to cooperate in internal investigations of misconduct. You must read GEO's Whistleblower Policy, which describes GEO's procedures for the receipt, retention, and treatment of complaints received by GEO

regarding accounting, internal accounting controls, or auditing matters. You may submit a good faith concern regarding questionable accounting or auditing matters without fear of dismissal or retaliation of any kind. Nothing in GEO's Whistleblower Policy is meant to restrain whistleblowers from communicating with the SEC or violate Rule 21F-17 under the Securities Exchange Act of 1934. Please also refer to Section 20 relating to the Special Code of Ethics for the CEO, Senior Financial Officers and Other Employees.

18. Non-Retaliation for Reporting

In no event will GEO take or threaten any action against you as a reprisal or retaliation for making a complaint or disclosing or reporting information in good faith. However, if a reporting individual was involved in improper activity, the individual may be appropriately disciplined even if he or she was the one who disclosed the matter to GEO. In these circumstances, GEO may consider the conduct of the reporting individual in promptly reporting the information as a mitigating factor in any disciplinary decision.

GEO will not allow retaliation against anyone for reporting a possible violation of this Code in good faith. Retaliation for reporting a federal offense is illegal under federal law and prohibited under this Code. Retaliation for reporting any violation of a law, rule or regulation or a provision of this Code is prohibited. Retaliation will result in discipline up to and including termination of employment and may also result in criminal prosecution. Reports made in bad faith or for malicious or misleading purposes, however, may lead to discipline, including termination.

19. Enforcement

GEO must ensure prompt and consistent action against violations of this Code. If, after investigating a report of an alleged prohibited action by a director or executive officer, the Audit and Finance Committee determines that a violation of this Code has occurred, the Audit and Finance Committee will report such determination to the Board of Directors. If, after investigating a report of an alleged prohibited action by any other person, the Office of Professional Responsibility determines that a violation of this Code has occurred, the Office of Professional Responsibility will report such determination to the applicable regional or divisional vice president. Upon receipt of a determination that there has been a violation of this Code, the Board of Directors or the applicable regional or divisional vice president will take such preventative or disciplinary action as it deems appropriate, including, but not limited to, reassignment, demotion, dismissal and, in the event of criminal conduct or other serious violations of the law, notification of appropriate governmental authorities. Please also refer to Section 20 relating to the Special Code of Ethics for the CEO, Senior Financial Officers and Other Employees.

20. Special Code of Ethics for the CEO, Senior Financial Officers and Other Employees

All of GEO's employees, including the CEO and all senior financial officers, including the principal financial officer, the principal accounting officer and controller and persons performing similar functions, are responsible for full, fair, accurate, timely and understandable disclosure in

the periodic reports required to be filed by GEO with the SEC. Accordingly, it is the responsibility of all employees of GEO to promptly report any untrue statement of material fact and any omission of material fact of which they may become aware pertaining to information prepared by him or her or associates in his or her area(s) of responsibility that affect the disclosures made by GEO in its public filings.

The CEO, each senior financial officer, and any other employee of the Company, shall promptly bring to the attention of the Disclosure Committee and, if deemed appropriate by the Disclosure Committee, to the Audit and Finance Committee of GEO, any information he or she may have concerning (a) significant deficiencies in the design or operation of internal controls or disclosure controls which could adversely affect GEO's ability to record, process, summarize and report financial data on an accurate and timely basis or (b) any fraud, whether or not material, that involves management or other employees who have a significant role in GEO's financial reporting, disclosures or internal controls.

The CEO, each senior financial officer and any other employee of GEO, shall promptly bring to the attention of the General Counsel and, if deemed appropriate by the General Counsel, to the Audit and Finance Committee of GEO, any information he or she may have concerning any violation of this Code, including any actual or apparent conflicts of interest between personal and professional relationships involving any management or other employees who have a significant role in GEO's financial reporting, disclosures or internal controls.

The CEO, each senior financial officer and any other employee of GEO, shall promptly bring to the attention of the General Counsel and, if deemed appropriate by the General Counsel, to the Audit and Finance Committee of GEO, any information they may have concerning evidence of a material violation of the securities or other laws, rules or regulations applicable to GEO, by GEO or any agent thereof.

The non-management members of the Board of Directors shall determine whether a violation of this Code by the CEO or any of GEO's senior financial officers has occurred and, if so, determine appropriate actions to be taken in the event of such violations. Such actions shall be reasonably designed to deter wrongdoing and to promote accountability for adherence to this Code and shall include, as appropriate, written notices to the individual involved that the non-management members of the Board of Directors have determined that there has been a violation, a censure, a demotion or re-assignment of the individual involved, a suspension with or without pay or benefits (as determined by the non-management members of the Board of Directors) and a termination of the individual's employment. In determining what action is appropriate in a particular case, the non-management members of the Board of Directors shall take into account all relevant information, including the nature and severity of the violation, whether the violation was a single occurrence or repeated occurrences, whether the violation appears to have been intentional or inadvertent, whether the individual in question had been advised prior to the violation as to the proper course of action and whether or not the individual in question had committed other violations in the past.

21. Waivers, Amendments and Modifications of the Code of Business Conduct and Ethics

There shall be no waiver of any part of this Code for any director or officer except by a vote of the Board of Directors or a designated board committee that will ascertain whether a waiver is appropriate under all the circumstances. In case a waiver of this Code is granted to a director or officer, the notice of such waiver shall be posted on our website within four days of the Board of Director's vote or shall be otherwise disclosed as required by applicable law or New York Stock Exchange rules.

There shall be no amendment or modification to this Code except by a vote of the Board of Directors or a designated board committee that will ascertain whether an amendment or modification is appropriate.

22. Ask First, Act Later

At GEO, we must all work to ensure prompt and consistent action against violations of this Code. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. These are the steps to keep in mind:

- Make sure you have all the facts. In order to reach the right solutions, we must be as fully informed as possible.
- Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with, and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.
- Clarify your responsibility and role. In most situations, there is shared responsibility. Are your colleagues informed? It may help to get others involved and discuss the problem.
- Discuss the problem with your supervisor. This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the question, and will appreciate being brought into the decision-making process. Remember that it is your supervisor's responsibility to help solve problems.
- Seek help from Company resources. In the rare case where it may not be appropriate to discuss an issue with your supervisor or where you do not feel comfortable approaching your supervisor with your question, discuss it locally with your office manager, your Human Resources manager, or GEO's Legal Department.
- You may report ethical violations in confidence and without fear of retaliation. If your situation requires that your identity be kept secret, your anonymity will be protected unless necessary to conduct an adequate investigation or compelled by judicial or other legal process. The Company does not permit retaliation of any kind against employees for good faith reports of ethical violations. For more information, consult the Company's Whistleblower Policy.

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Always ask first, act later: If you are unsure of what to do in any situation, seek guidance before you act.

APPROVED: _____
Corporate Policy Director