

	<p align="center">CORPORATE POLICY & PROCEDURE MANUAL</p> <p>CHAPTER: Human Resources</p> <p>TITLE: Equal Employment Opportunity</p>	<p><u>NUMBER:</u> 3.1.13</p> <p><u>SUPERSEDES:</u> 01/15/16</p> <p><u>EFFECTIVE:</u> 04/01/16</p>
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POLICY

The GEO Group, Inc. (GEO) is an equal opportunity employer and prohibits discrimination against employees, applicants for employment, or any individuals providing services to GEO in the workplace (under a contract or otherwise), on the basis of race, religions creed, color, sexual orientation, age, national origin, ancestry, physical disability, mental disability, medical condition, genetic information, military and veteran status, marital status, sex, gender, gender identity, gender expression or any other category protected by federal, state or local law. The definitions of the categories protected under this Policy are consistent with applicable law.

In addition, GEO engages in interactive processes to ensure that qualified individuals with disabilities under the Americans with Disabilities Act as Amended and other applicable law are afforded a reasonable accommodation for their disability.

This Policy covers all aspects of the application for employment, the employment relationship including working conditions, personnel actions (including discipline and termination), promotion and transfer, layoff and recall, compensation, access to training and employee benefits and shall be applicable to all employees, including supervisors and managers, and all third parties engaged in and doing business with GEO (such as customers, sub-contractors, vendors and suppliers).

It is the responsibility of all employees and third parties of GEO to adhere to this Policy and to support the spirit and principle of this Policy and to treat each other with dignity and respect and to immediately alert GEO of any actual or perceived discrimination. Any employee who believes that he or she has been subject to conduct in violation of this Policy should promptly report his or her complaint, either orally or in writing to a member of management, the Director of Employee & Labor Relations, the Vice President Corporate Counsel, Labor & Employment, Vice President, Office of Professional Responsibility or to GEO's Hotline (1-866-568-5425).GEO Management will ensure that all personnel actions are administered according to this Policy.

PROCEDURE

A. Employee Complaint

In the event an employee believes in good faith that he/she has been discriminated against, that employee should promptly report the incident to a member of management, the Director of Employee & Labor Relations, the Vice President Corporate Counsel, Labor & Employment,



Vice President, Office of Professional Responsibility or to GEO's Hotline (1-866-568-5425) in an effort to remedy the problem at the earliest opportunity. Employees may, but are not required to, report their complaints under this Policy to their immediate supervisor.

B. Retaliation Prohibited

In accordance with applicable law, GEO strictly prohibits retaliation against any individual, applicant or employee who makes a report to GEO of a perceived or actual violation of this Policy or who files a charge of discrimination, with federal, state, or local agency, participates in a workplace investigation or government investigation of a complaint alleging a violation of this Policy, opposes any act or practice prohibited under this Policy or made unlawful by any federal, state or local law requiring equal opportunity or exercises any other right protected by federal, state, or local law requiring equal opportunity. Any form of retaliation must be reported immediately. Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit. Any conduct that may be perceived as or may constitute retaliation should be reported to GEO using the avenues set forth in this Policy.

C. Notice to Third-Parties (Sub-contractors, Vendors, and Suppliers)

Written notification of Company policies regarding non-discrimination, Equal Employment Opportunity and Affirmative Action will be sent to all sub-contractors, vendors and suppliers requesting appropriate action on their part. This will be coordinated from Corporate Headquarters with each facility.

D. EEOC or any related Federal or State Agency Charge or Complaint

The U.S. Equal Employment Opportunity Commission (EEOC) and applicable state or local agencies are also additional avenues in which an individual may lodge a complaint.

All facility locations must immediately notify the Director of Employee & Labor Relations and the Vice President, Corporate Counsel Labor & Employment upon receipt of demand letter from an attorney or a formal, written charge or complaint from attorneys, or the EEOC, or other federal, state or local agencies. The written charge or complaint must be promptly forwarded to the Director of Employee & Labor Relations and the Vice President Corporate Counsel, Labor & Employment upon receipt.

E. Investigation

1. Managers and supervisors must treat all allegations of discrimination as potential litigation. Reporting of such allegations should be immediate and be done in a



confidential manner to the extent possible. Managers and supervisors must report any allegations of misconduct under this Policy to the Director of Employee & Labor Relations, the Vice President Corporate Counsel, Labor & Employment so GEO can try to resolve the claim internally.

2. Upon receipt of allegations of discrimination, GEO will conduct a fair, timely, and thorough investigation conducted by qualified individuals, that provides all parties appropriate due process and reaches reasonable conclusions based on the evidence collected.
3. Employees are expected to cooperate with Company officials who are assigned to investigate any allegation of discrimination. Refusal to cooperate in an investigation could subject an employee to disciplinary action, up to and including termination of employment.
4. Complaints will be investigated in a timely manner and will be kept confidential to the possible and to the extent permitted under applicable federal and state law.
5. Depending upon the severity of a discrimination complaint, it may be appropriate to suspend or otherwise transfer the accused away from the Complainant. The accused may not be suspended or transferred without the express approval of the Corporate Human Resources or Legal Departments.
6. Appropriate corrective disciplinary action, up to and including termination of any employee, regardless of the level of his/her position, and/or other appropriate remedial measures, will result if any allegation of discrimination is substantiated.
7. **GEO strictly prohibits retaliation against an employee who either has complained of discrimination and/or who has participated in any discrimination investigation.**

APPROVED: _____
Corporate Policy Director

EFFECTIVE: 04/01/16

POLICY OWNER: Christopher Ryan, VP Human Resources

REFERENCES: ACA Standards 4-4053, 4-ACRS-7E-05