POLICY

This Policy and Procedure replaces and supersedes Sexual Harassment and Workplace Harassment Policy 3.2.10 dated April 1, 2013 and Procedure 3.2.10-A dated February 27, 2014. In accordance with applicable law, The GEO Group, Inc. (GEO) is committed to providing a workplace that is free from harassment, and maintains a strict policy prohibiting sexual harassment and other forms of harassment on the basis of race, religious 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. GEO has developed a procedure to follow in the event an individual feels they have been subject to conduct that violates this Policy.

This Policy applies to all persons involved in our operations, including co-workers, supervisors, managers, temporary or seasonal workers, applicants for employment, agents, clients, vendors, customers, or any other third-party interacting with GEO (“third-parties”) under a contract or otherwise and prohibits harassing conduct by any employee or third-party of GEO, including nonsupervisory employees, supervisors, and managers. If such harassment occurs on GEO’s premises or is directed toward an employee or a third-party interacting with GEO, the procedures in this Policy should be followed. Violation of any part of this Policy may result in disciplinary action, up to and including termination of employment.

DEFINITIONS

SEXUAL HARASSMENT

GEO strictly prohibits any conduct that constitutes sexual harassment, such as:

1. Making unwelcome sexual advances, requests for sexual favors or other verbal or physical conduct of a sexual nature a term or condition of employment; or

2. Making submission to or rejection of such conduct the basis for employment decisions affecting the individual; or
3. Engaging in conduct that has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile or offensive working environment by such conduct.

Sexual harassment may take different forms and includes gender-based harassment of a person of the same sex as the harasser. Examples of the various forms of harassment are:

**Verbal:** Sexual innuendoes, suggestive comments, jokes of a sexual nature, comments about an individual’s body or dress, sexual propositions or sexual threats.

**Non-verbal:** Sexually suggestive objects or pictures, cartoons, posters, websites, emails or text messages (or other messages via social media), suggestive or insulting sounds, leering, whistling or obscene gestures.

**Physical:** Unwanted physical contact, including touching, pinching, brushing the body, impeding or blocking movements, coerced sexual intercourse or assault.

This list is not necessarily exhaustive of what could be construed as sexual harassment.

**WORKPLACE HARASSMENT**

Consistent with GEO’s policy on sexual harassment, it is also strictly against policy for an employee to harass another individual in the workplace on the basis of race, religious 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 law.

Harassment under this Policy is verbal, non-verbal or physical conduct that denigrates or shows hostility or aversion toward another individual or his or her relatives, friends or associates because of their race, religious 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 law, and that:

1. Has the purpose or effect of creating an intimidating, hostile, offensive work environment; or

2. Has the purpose or effect of unreasonably interfering with an individual’s work performance; or

3. Otherwise adversely affects an individual’s employment.

Harassing conduct includes, but is not necessarily limited to, epithets, slurs, or negative stereotyping; vulgarity; threatening, intimidating or hostile acts; and written or graphic material
that denigrates or shows hostility or aversion toward an individual or group that is placed on walls or elsewhere in the employer’s premises or circulated in the workplace.

**REPORTING PROCEDURE**

Any employee who believes that he or she has been harassed or subjected to abusive conduct by a co-worker, supervisor, agent, client, vendor, customer, or any other third party interacting with GEO in violation of this Policy, or who is aware of such behavior against others, should promptly report the incident to a member of management, the Director of Employee & Labor Relations, the Vice President Corporate Counsel, Labor & Employment, the 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.

All incidents of harassment, alleged or actual, must be treated as potential litigation. Managers and supervisors must report any allegations of misconduct under this Policy to the Director of Employee & Labor Relations or the Vice President Corporate Counsel, Labor & Employment so GEO may resolve the claim internally.

Upon receipt of an allegation of harassment, GEO will conduct a fair, timely, and thorough investigation, conducted by qualified individuals, and that provides all parties appropriate due process and reaches reasonable conclusions based on the evidence collected.

Employees are expected to cooperate with Company officials who are assigned to investigate a harassment complaint. Refusal to cooperate in such an investigation could subject an employee to disciplinary action, up to and including termination of employment.

Complaints will be investigated in a timely manner and will be kept confidential to the extent possible and to the extent permitted under applicable federal and state law.

Depending upon the nature of a harassment 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 Corporate Human Resources or the Legal Department.

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(s) of harassment are substantiated.
WORKPLACE HARASSMENT

Be advised that it is against GEO policy for an employee to knowingly bring false accusations of harassment (sexual or otherwise) against another in the workplace. If an employee knowingly and willfully brings forth a false claim, they will be subjected to disciplinary action, up to and including termination of employment.

RETALIATION

Retaliation is strictly prohibited. It is against GEO policy to retaliate against an individual, applicant, or employee who either has reported a complaint of any form of harassment to GEO and/or has participated in a workplace harassment investigation.

GEO will not retaliate against an employee who, in good faith, makes a complaint or report of harassment, or who participates in the investigation of such a complaint or report. Retaliation against any individual for good faith reporting of a claim of harassment or participating in an investigation of alleged harassment will not be tolerated and will itself be cause for appropriate disciplinary action, up to and including termination of employment.

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.

NOTIFICATION

- Management is to ensure that this Policy is provided to all current and newly hired employees including Managers, Supervisors, and Business Development Representatives and that the acknowledgement form (HR-897) is signed by such individuals. The Form (HR-897) is to be retained in the employee’s official personnel file.

- Management is to ensure that this Policy statement is periodically conspicuously posted and distributed to employees. This statement may be included in the post orders book and periodically included in payroll envelopes.

- Management is to support and promote GEO’s philosophy and commitment to a workplace free of sexual/workplace harassment. Employees should be assured that an open door policy exists to discuss and report harassment under this Policy.

- Management is to reinforce this Policy periodically, for example, during staff meetings, training sessions, one on one discussions, etc. Training should be well documented by maintaining a record of the training content and date of training. All persons receiving
training shall sign and date an attendance sheet acknowledging their participation in the training.

- Failure on the part of a Manager/Supervisor to advise the Director of Employee & Labor Relations or the Vice President Corporate Counsel, Labor & Employment of conduct, or of any complaints of conduct, that may violate this Policy may be cause for disciplinary action, up to and including termination of employment.

APPROVED: ____________________
Corporate Policy Director

04/01/16

EFFECTIVE: ____________________

POLICY OWNER: Christopher Ryan, Vice President of Human Resources

REFERENCES: ACA Standards 4-4056, 4-ALDF-7E-01, and 4-ACRS-7E-04