

PURPOSE

To establish a corporate policy against sexual harassment and workplace harassment and to develop a procedure to follow in the event an employee feels they are a victim of harassment.

RESPONSIBILITY

It is the responsibility of all employees to read and comply with this policy. It is the responsibility of those in management/supervisory positions at all levels, who have received sexual harassment and/or workplace harassment complaints, to react immediately and appropriately by following the policies and procedures below.

POLICY

SEXUAL HARASSMENT

Sexual harassment, whether it occurs between a supervisor and a subordinate or between coworkers, cannot and will not be tolerated by The GEO Group, Inc. (GEO). Sexual harassment is a violation of Title VII of the Civil Rights Act of 1964 and it is against our policy for any employee, male or female, to sexually harass others by:

- 1. Making unwelcome sexual advances, requests for sexual favors or other verbal or physical conduct of a sexual nature a condition of an employee's employment; or
- 2. Making submission to or rejection of such conduct the basis for employment decisions affecting the employee; or
- 3. Creating an intimidating, hostile or offensive working environment by such conduct.

Sexual harassment may take different forms. Examples of these forms are:

<u>Verbal</u>: Sexual innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions or sexual threats.

<u>Non-verbal</u>: Sexually suggestive objects or pictures, suggestive or insulting sounds, leering, whistling or obscene gestures.



<u>Physical</u>: Unwanted physical contact, including touching, pinching, brushing the body, coerced sexual intercourse or assault.

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

Additionally, since many of our employees have frequent contact with client and vendor employees, be aware that the Equal Employment Opportunity Commission (EEOC) attaches employer liability for the acts that non-employees (i.e. clients, vendors) make toward employees if the employer is made aware of the situation and fails to take corrective measures.

If an investigation into a sexual harassment complaint concludes that an employee violated this policy by sexually harassing another employee, the violator will be subjected to discipline which may include termination of employment, regardless of their level. Employees in management and/or supervisory positions in particular will be held to the highest of standards with respect to their conduct.

How to File a Complaint:

Employees who believe they are the victims of sexual harassment are to immediately contact their supervisor, management, Human Resources or the Hotline, which is an independent, professional service that may be contacted 24 hours per day, 7 days per week, at the toll free phone number (866-568-5425) for appropriate action. For the comfort of the complaining employee, a management representative who is the same gender as the employee may be made available to discuss the issue.

WORKPLACE HARASSMENT

Consistent with GEO's policy on sexual harassment, it is also strictly against policy for employees to harass other employees on the basis of race, color, sex, national origin, religion, age, disability, veteran status, citizenship, sexual orientation, gender identity or marital status, or any other factor 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 their relatives, friends or associates because of their race, color, sex, national origin, religion, age, disability, veteran status, citizenship, sexual orientation, gender identity or marital status, or any other factor protected by law, and that:

- 1. Has the purpose or effect of creating an intimidating, hostile, offensive work environment
- 2. Has the purpose or effect of unreasonably interfering with an individual's work performance
- 3. Otherwise adversely affects an individual's employment.

Harassing conduct includes, but is not necessarily limited to, epithets, slurs, or negative stereotyping; threatening, intimidating or hostile acts; and written or graphic material that

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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.

How to File a Complaint:

As with sexual harassment, any employee who believes they are the victim of harassment should contact their supervisor, management, Corporate Headquarters Human Resources or the Hotline (866-568-5425) for appropriate action. If it is determined that an employee has violated this policy by harassing another employee, he/she will be subjected to disciplinary action, up to and including termination of employment.

Be advised that it is against GEO policy for an employee to knowingly bring false accusations of harassment (sexual or otherwise) against another employee. 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 IS PROHIBITED

It is strictly against GEO policy to retaliate against an employee who either has complained of sexual/workplace harassment and/or has participated in sexual/workplace harassment investigations.

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 for cooperating in the investigation of same will not be tolerated and will itself be cause for appropriate disciplinary action, up to and including termination of employment.

RELATIONSHIPS / DATING

Corporate Personnel:

Corporate Headquarters employees are prohibited from establishing/having a sexual/ romantic/ dating relationship with their direct or indirect subordinates.

Corporate Headquarters employees are prohibited from establishing/ having sexual/ romantic/ dating relationships with any employee in the field at any level.

Field Personnel:

All field personnel are prohibited from establishing/ having sexual/ romantic/dating relationships with any corporate employee.



All field employees are prohibited from establishing/having a sexual/romantic/dating relationship with any direct or indirect subordinates or subordinate within the scope of their influence.

PROCEDURE

- Management is to ensure that this policy is provided to current and newly hired field Managers, Supervisors, and Business Development Representatives and that the acknowledgement form (HR-808) is signed by such employees. The form is to be retained in the employee's file.
- Management is to ensure that the Sexual Harassment/Workplace Harassment Policy Statement (HR-808) is given to each newly hired field non-management employee during the hiring process/initial days of employment and that the acknowledgement form which is attached to the policy statement (HR-808) is signed by such employees. This form is to be retained in the employee's file.
- Management is to ensure that the Sexual Harassment/Workplace Harassment Policy Statement is 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.
- 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 should sign and date attendance sheet acknowledging training.
- Pursuing or allowing sexual/romantic/dating relationships to develop or continue as defined and discussed in the Relationships/Dating portion of this policy, is a violation of this policy and may result in disciplinary actions up to and including termination.
- All such incidents, alleged or actual, must be treated as potential litigation. Actions must be handled in a discreet, confidential manner. An accurate reporting of the incidents, alleged or actual, must be given to the Human Resources or Legal Department.
- If the alleged harassment of a GEO employee is due to the misconduct of a client or vendor's employee, it is the Manager's responsibility to report this to Human Resources or Legal.
- Failure on the part of a Manager/Supervisor to advise Human Resources/Legal of sexual harassment complaints may be cause for disciplinary action up to and including termination.



INVESTIGATION

- Employees are expected to cooperate with GEO officials who are assigned to investigate a harassment complaint. Refusal to cooperate in an official investigation could subject an employee to disciplinary action, up to and including termination of employment.
- Upon being made aware of a harassment (sexual or otherwise as defined previously in this policy) allegation, whether confirmed, reported or suspected, Management will immediately advise the Human Resources Department or Legal Department.
- Complaints will be investigated in a timely manner and will be kept confidential to the extent practicable recognizing that during an investigation, the alleged harasser and witnesses would need to be contacted.
- Depending upon the seriousness of a harassment complaint, it may be appropriate to suspend
 or otherwise transfer the accused away from the Complainant for the duration of the
 investigation. Under no circumstances should the Complainant be suspended or transferred
 without the express approval of the Human Resources and/or Legal Departments.
- Appropriate corrective disciplinary action, up to and including termination of any employee, regardless of the level of their position, will be taken if the stated investigation warrants.

APPROVED: _

Corporate Officer

EFFECTIVE: <u>03/31/10</u>