



The California Transparency in Supply Chains Act of 2010 went into effect on January 1, 2012, with the goal of eliminating slavery and human trafficking from global product supply chains through increased disclosure of corporate actions.

GEO expects its suppliers to comply with all applicable local and foreign laws and some of our contracts impose legal compliance obligations on the entities with which we do business. GEO does not currently engage in verification, audits, or universal certification requirements of our suppliers to evaluate and address the risk of human trafficking or slavery, but we do not intentionally or knowingly do business with any company or person that is engaged in human trafficking or slavery. GEO is a private company and we do business with many of the largest chemical companies in the world. As such, we do not currently feel that we can efficiently and effectively impose our own vendor code of conduct on these types of major global companies. However, we do take comfort from the fact some of our major material suppliers are among the most respected companies in the world, maintaining sophisticated compliance policies and procedures governing their supply chains. Many of our suppliers have disclosed their own human trafficking and slavery related policies and practices under the California Transparency in Supply Chains Act.

While those involved in managing our supply chain do undergo training in their function, we do not currently provide mandatory training on human trafficking and slavery.

GEO does not currently have internal accountability standards or procedures in place for employees or suppliers who fail to meet our company standards. However, certain of GEO's policies and procedures, including our Code of Business Conduct (which requires an annual self-certification), our Employee Handbook, and our whistleblower hotline, specifically mandate compliance with laws or otherwise promote the dissemination of information about matters of concern for our employees.

As GEO continues to grow, we will continue to review our suite of compliance policies and procedures.