

RESOLVED: Shareholders request that the Board of Directors commission an independent third-party report, at reasonable expense and excluding proprietary information, on the effectiveness of GEO Group's ("GEO's") due diligence process to determine whether its services contribute to violations of international human rights law and expose the company to material risks.

WHEREAS: With shareholder support, GEO adopted a Global Human Rights Policy in 2013, revised in 2025,¹ guided by international standards, including the United Nations Guiding Principles on Business and Human Rights ("UNGPs").

In the UNGPs, human rights due diligence is one of three requirements of the corporate responsibility to respect human rights.² Under United Nations ("UN") conventions, "The widespread or systematic practice of enforced disappearance constitutes a crime against humanity," and criminal responsibility befalls "Any person who... induces the commission of... is an accomplice to or participates in an enforced disappearance."³ International standards require parties avoid complicity in enforced disappearances, with consequent criminal liability risk.

Yet, GEO remains deeply involved in deportation flight operations. For example, GEO's Northwest Detention Center (NWDC) in Tacoma, Washington has been linked to deportations to El Salvador: the University of Washington's Center for Human Rights (UWCHR) identified that on "March 8, 2025—11 people were booked out for removal from the NWDC, including six Venezuelan men sent to CECOT prison in El Salvador."⁴ UN human rights experts have stated that "deportations [to El Salvador] and related incommunicado detentions appeared to involve enforced disappearances, contrary to international law."⁵ GEO assists deportation operations across the U.S., including from its Alexandria, Louisiana facility.⁶

¹ <https://www.geogroup.com/geo-global-human-rights-policy>

² UNGP 15

https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinessshr_en.pdf

³ Article 5 and Article 6, <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-convention-protection-all-persons-enforced>

⁴ <https://jsis.washington.edu/humanrights/2025/08/21/gross-human-rights-violations-in-washington-state-enforced-disappearance-and-refoulement/>

⁵ <https://www.ohchr.org/en/press-releases/2025/04/un-experts-alarmed-illegal-deportations-united-states-el-salvador>

⁶ <https://www.theguardian.com/us-news/ng-interactive/2025/sep/12/ice-detention-alexandria-staging-facility>

Additionally, GEO's wholly-owned subsidiary, GEO Transport, Inc. ("GTI"), is the largest provider of transportation for U.S. Immigration and Customs Enforcement ("ICE").⁷ GTI was awarded a five-year contract to provide air operations support services on behalf of ICE.⁸ The Air Marshal National Council stated that the federal government contracted GTI to provide security on board ICE deportation flights.⁹

Department of Homeland Security Transportation Orders obtained by UWCHR instruct GTI buses to pick up detainees at ICE's Seattle Hold Room and transport them directly to planes via the tarmac of the Seattle-Tacoma International Airport. These orders document GTI as the party responsible immediately prior to deportation flights.

GEO and its subsidiary GTI provide transportation to and security on deportation flights, including cases that may "involve enforced disappearances." Shareholders are concerned that the company is not properly mitigating material human rights risks.

SUPPORTING STATEMENT

Shareholders seek information, at the board and management's discretion, through a report that could describe GEO's due diligence process to prevent involvement in cases of enforced disappearance; the board's role in overseeing the management of risks associated with deportation operations; assessment of international law and material risks to shareholder value; and recommendation of additional measures, if any, to mitigate risks.

⁷ <https://www.brennancenter.org/our-work/analysis-opinion/private-prison-companies-enormous-windfall-who-stands-gain-ice-expands>

⁸ <https://investors.geogroup.com/news-releases/news-release-details/geo-group-announces-five-year-contract-provide-air-operations>

⁹ <https://amp.cnn.com/cnn/2025/07/31/politics/ice-deportation-air-marshals>