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			POLICY TITLE GOVERNMENT RELATIONS	
FSC EFFECTIVE DATE SEPTEMBER 1, 2017		FSC SUPERSEDES DATE SEPTEMBER 1, 2010		

3-28.1 POLICY:

CoreCivic will comply in all respects with laws and regulations applicable to its corporate political and government relations activities. This policy defines certain policies and procedures and provides guidance to CoreCivic employees with respect to government relations activities. **(4-4024; 4-ALDF-7C-02)**

3-28.2 AUTHORITY:

CoreCivic Company Policy

3-28.3 DEFINITION:

Government Relations Liaison – CoreCivic employee(s) designated by the Chief Development Officer to coordinate government relations compliance activities pursuant to this policy.

Office of General Counsel – The General Counsel or designee.

Political contribution – Contribution of corporate funds, personnel, property, time, or resources in support of a political candidate, committee, party, referendum or ballot initiative. The term also includes contributions to 527, 501(c)(4), or like organizations.

3-28.4 PROCEDURES:

PROCEDURES INDEX

SECTION	SUBJECT
A	Political Contributions
B	Lobbying
C	Personal Political Activity
D	Violations
E	Acknowledgment
F	Communication and Training

A. POLITICAL CONTRIBUTIONS

1. Corporate Contributions

- a. Subject to subsections 1.b - 1.d below, corporate political contributions may be given if allowed by and in compliance with applicable laws and regulations and with approval from:
 - i. The Chief Executive Officer, Chief Development Officer or a Vice President, Partnership Relations, and
 - ii. The Office of General Counsel.
- b. Any political contribution using corporate treasury funds must be approved in accordance with the procedure and forms adopted pursuant to CoreCivic Policy 2-10, General Cash Controls.
- c. Corporate treasury funds may not be used to reimburse or pay for a political contribution by or in the name of another person or entity or on an anonymous basis.
- d. Corporate treasury funds may not be used to make a contribution or expenditure in connection with an election for federal office unless permitted by applicable

law and approved by the Chief Executive Officer and the Office of General Counsel.

2. Individual Contributions

- a. CoreCivic employees may make personal political contributions in their sole discretion. The decision as to whether or not to contribute is at the sole discretion of the individual and any decision not to participate shall have no impact on any personnel actions regarding such individual. Personal contributions should be made in compliance with applicable federal or state campaign finance laws.
- b. Under no condition will personal political contributions be reimbursed by the company or a facility or otherwise identified as a business expense by the individual making the contribution.
- c. Subject to the foregoing, the Government Relations Liaison may track contributions of certain individuals to help ensure compliance with applicable laws and regulations by such persons and to ensure compliance with "pay to play" laws.

3. Reporting of Contributions

- a. The Government Relations Liaison shall, in consultation with the Office of General Counsel, develop procedures to ensure that all corporate political contributions are properly documented, transmitted, and reported in compliance with applicable laws and regulations.
- b. The Government Relations Liaison shall consult with the Office of General Counsel prior to making a contribution in a jurisdiction where such procedures have not been developed (for example, because contributions have not previously been made in that jurisdiction) in order to ensure proper reporting.

4. Political Action Committees

- a. CoreCivic may establish one or more political action committees (PACs) to make political contributions in jurisdictions where such contributions are permissible.
- b. Any political action committee must be established in consultation with the Office of General Counsel and must be established and operate in compliance with applicable laws and regulations.

5. "Pay to Play"

- a. Pay to Play laws prohibit a corporation from entering into business arrangements or contracts with certain government entities if the corporation, its PAC, and/or certain covered directors, officers, employees and their family members make or solicit contributions. Contracting bans may last up to five (5) years. Even in states that do not have pay to play rules, a contribution may never be used to influence a decision by an officeholder or government employee.
- b. The company will comply with all pay to play laws and shall maintain procedures reasonably designed to ensure such compliance.
- c. Partnership Relations and Partnership Development employees are encouraged to consult with the Office of General Counsel whenever consideration is being given to pursuing business in a new jurisdiction in order to determine whether pay to play laws apply.

6. Board Reporting

The Office of General Counsel, with support from the Government Relations Liaison, shall

prepare and submit a report on corporate political contributions to the Board of Directors or an appropriate committee thereof on at least an annual basis.

B. LOBBYING

1. General

- a. For purposes of this policy, lobbying refers generally to contacts with legislative or executive officials or staff on behalf of the company for the purpose of influencing legislative or executive action. Lobbying laws vary by jurisdiction; accordingly, the laws and regulations of the particular jurisdiction must be consulted to determine whether an employee is engaged in lobbying.
- b. Only employees designated by the Chief Development Officer or a Vice President, Partnership Relations may engage in lobbying on behalf of the company.
- c. Only the Chief Development Officer or a Vice President, Partnership Relations may retain an outside lobbyist on behalf of the company.

2. Evaluation of Activities; Compliance Guidance; Lobbyist Reporting

- a. A CoreCivic employee who is engaged in or may engage in activity that could constitute lobbying must notify the Government Relations Liaison.
- b. Upon receiving notice, the Government Relations Liaison shall consult with the Office of General Counsel or designee to determine whether registration as a lobbyist is required and to provide the employee guidance regarding applicable restriction and requirements.
- c. The Government Relations Liaison shall, in consultation with the Office of General Counsel, develop procedures to ensure that all required reports are filed in an accurate and timely manner with respect to CoreCivic and its registered lobbyists.

3. Political Communications; Grassroots Lobbying

- a. Political communications to company employees, stockholders or third parties and using company facilities, technology, personnel, or other resources must be submitted to the Office of General Counsel for review and approval.
- b. Grassroots lobbying may trigger registration or reporting obligations.

4. Contingency Fee Arrangements

- a. A majority of states prohibit arrangements for compensation based on the outcome of official action.
- b. Any agreement structured as a contingency fee or success fee arrangement must be approved in advance by the Office of General Counsel.

5. Prohibited Activity

- a. CoreCivic employees are specifically prohibited from attempting to influence decisions made by government officials regarding issues directly or indirectly related to inmate sentencing. This includes, but is not limited to, political communications, grassroots lobbying, and PAC contributions.

C. PERSONAL POLITICAL ACTIVITY

1. Every employee is encouraged to participate actively in the political affairs of his or her community, state and country, and to stay informed on public issues and on the positions

and qualifications of candidates for public office. However, each person should ensure that his or her personal political activities are lawful and separate from those of the company. In addition, this activity must not unreasonably interfere with such individual's ability to perform his or her duties for the company and must not be inconsistent with applicable laws, rules and regulations or company policy.

2. Any employee considering running for office or serving in government must consult with the Office of General Counsel before doing so.
3. Personal political contributions may be subject to review in compliance with section A.2, above.
4. Employees must be aware that personal political activity, if conducted using company facilities or resources, or on company time, could be deemed a corporate political contribution. Employees engaging in personal political activity must be aware of applicable rules and regulations and seek guidance prior to engaging in any such activity.

D. VIOLATIONS

Violations of this policy may result in disciplinary action, up to and including termination of employment.

E. ACKNOWLEDGMENT

1. Each CoreCivic employee will be provided a copy of this policy to read and is required to acknowledge receipt by signing the 3-28A Government Relations Acknowledgment form upon initiation of employment and any subsequent policy changes thereafter.
2. The Human Resource Representative or designee will be responsible for maintaining the 3-28A in accordance with Corecivic Policy, 3-9, Employee Records.

F. COMMUNICATION AND TRAINING

Communications and training regarding this policy will be provided as determined by Ethics and Compliance.

3-28.5 REVIEW:

This policy will be reviewed by the General Counsel, Ethics and Compliance, and the President/CEO on an annual basis or more frequently as needed.

3-28.6 APPLICABILITY:

All CoreCivic Facilities

3-28.7 APPENDICES:

None

3-28.8 ATTACHMENTS:

3-28A Government Relations Acknowledgment

3-28.9 REFERENCES:

CoreCivic Policy 1-9

CoreCivic Policy 2-10

CoreCivic Policy 3-3

CoreCivic Policy 3-9

CoreCivic Policy 3-27

American Correctional Association (ACA) Standards:

4-4024

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