

The CoreCivic Code of Ethics



INTEGRITY INTO ACTION

Introduction

At CoreCivic, and our subsidiaries, we believe in doing business the right way, guided by our Values that make up our organization.

Integrity, in particular, must be central to all we do, impacting:

- How we serve our government partners.
- How we engage with our employees.
- How we treat our resident populations and non-residential clients.
- How we interact with our communities and investors.
- How we collaborate with other third parties, such as our vendors and subcontractors.

The CoreCivic Code of Ethics is a guide to putting Integrity into Action.

It helps us be who we say we are and do what we say we will do. The Code explains the standards and behaviors that we expect from each other. It also provides information that can help us when we need to solve problems, report concerns or seek guidance.



Our Purpose, Mission and Values

OUR PURPOSE

Help government better the public good

OUR MISSION

We help government better the public good through:

- **CoreCivic Safety** – We operate safe, secure facilities that provide high-quality services and effective reentry programs that enhance public safety.
- **CoreCivic Community** – We deliver proven and innovative practices in settings that help people obtain employment, successfully reintegrate into society and keep communities safe.
- **CoreCivic Properties** – We offer innovative and flexible real estate solutions that provide value to government and the people they serve.

OUR VALUES (P.R.I.D.E.)

Professionalism – Leading by example with passion and commitment, and conducting ourselves in a manner that is responsive to each other, our partners and those entrusted to our care.

Respect – Treating all people with dignity, fairness and understanding.

Integrity – Conducting ourselves ethically and honestly, and upholding the trust placed in us through support for each other and accountability to ourselves, our partners and the public.

Duty – Answering the call to serve and responsibly fulfill our obligations to each other, our partners, the public and those entrusted to our care.

Excellence – Achieving exceptional results through innovation and an unwavering commitment to quality and self-improvement.

How to Use the Code

The topics in this Code are organized by five guiding behaviors that help us put Integrity into Action. At CoreCivic, we:

- Help each other do the right thing.
- Meet our obligations with honest business practices.
- Keep our facilities and communities safe.
- Support a culture of respect and inclusion.
- Protect the assets and interests of our organization.

The table of contents allows us to locate specific topics that relate to these guiding behaviors.

The Code can be found on the Ethics and Compliance page of the CoreCivic intranet, on the CoreCivic Employee Portal, online at www.corecivic.com or on CoreCivic Ethics Line site, www.corecivic.com/ethicsline. You also can locate the Code under **CoreCivic Policy 3-3: Code of Ethics**, in the CoreCivic policy library. Hard copies are available at your facility.

CORECIVIC POLICIES REFERENCED IN THE CODE OF ETHICS

For some topics, CoreCivic policies are listed at the end of a topic to provide more detailed policy information on that topic. A Policy Reference Guide is included as an Appendix that lists all of the policies referenced in the Code.

Policy references are for CoreCivic Facility Support Center policies. In some cases, the policy number, name or content that applies to your facility will be different. You should consult your local policy.

Policies other than those identified in the Code may apply to a particular situation. Also, policy information in the Code is qualified by more specific requirements of other CoreCivic policies. You are responsible for knowing the policies that apply to you.

If you have questions, consult your supervisor or a subject matter expert, or use the Ethics Line.

Code Administration

The Code is administered by the CoreCivic Chief Ethics and Compliance Officer. Instructions for contacting Ethics and Compliance can be found in the [Speaking Up and Seeking Help](#) section on page 14.

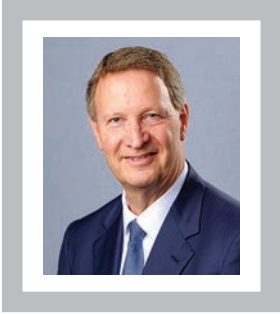
The Board of Directors or a designated Board committee addresses questions involving the application of the Code to CoreCivic executive officers and members of the CoreCivic Board of Directors.

CoreCivic may take disciplinary action, up to and including termination of employment or other service relationship, based on a violation of this Code.

In rare circumstances, CoreCivic may waive the application of this Code. Any such waiver would require approval by the Board of Directors or a designated Board committee. CoreCivic will promptly disclose any waivers consistent with its obligations under applicable law and the New York Stock Exchange listing standards.



Executive Messages



Message from Mark A. Emkes

Chairman of the Board of Directors

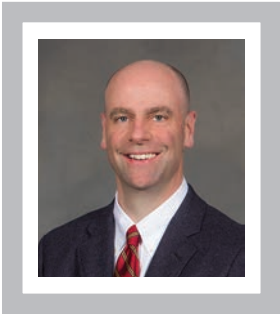
A strong ethical culture is the cornerstone of any successful organization. At CoreCivic, we place special emphasis on fostering an ethical environment across all lines of business. I'm proud to serve as Board Chairman for a company with such a strong commitment to doing the right things and doing things right.

We have a responsibility to help government better the public good. Our Code of Ethics helps us fulfill this mission with integrity. And when we work with integrity, we make smart business decisions and bring value to those we serve.

On behalf of the Board, I appreciate your commitment to making CoreCivic a successful organization – one that's built on a foundation of ethical conduct.

Mark A. Emkes

Chairman of the Board of Directors



Message from Damon T. Hininger

President and Chief Executive Officer

Since 1983, CoreCivic has been a reliable government partner and a good neighbor in the communities we call home. But we wouldn't be able to provide these meaningful public services without you – the people who make up the CoreCivic family. Our success as a company starts with you; that's why it's so important that you follow our Code of Ethics.

At its core, our Code is about doing the right thing, which includes treating people right, whether they're co-workers, residents, visitors or others we serve. Here at CoreCivic, we hold ourselves to the highest ethical standards, and the Code applies to all of us.

Thank you for doing your part to keep our company strong by following our Code of Ethics. As always, I deeply appreciate the important work you do.

Damon T. Hininger

President and Chief Executive Officer



Message from Scott Craddock

Vice President and Chief Ethics and Compliance Officer

Each day, we're presented with a variety of choices. The decisions we make help define who we are and what we will become, individually and as an organization.

Making the right choice isn't always easy. That's where our Code of Ethics comes in. Think of it as a guide to turning our company Value of Integrity into Action through our daily choices.

Please read the Code carefully and refer back to it as needed. I encourage you to ask questions and speak up when you have a concern about an ethics or compliance issue – talk with local leadership or a subject matter expert or contact Ethics and Compliance (see the [Speaking Up and Seeking Help](#) section on page 14).

It's my hope that this Code helps you make good choices. When we use our decisions as opportunities to turn Integrity into Action, we can be proud of our work, and we help CoreCivic be its best.

Scott Craddock

Vice President and Chief Ethics and Compliance Officer

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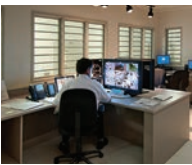
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WE HELP EACH OTHER DO THE RIGHT THING.

We help each other make good, values-based decisions. When we all live by our Values, we support our mission and make our company stronger.



TAKING RESPONSIBILITY FOR OUR ETHICAL CULTURE

We are all responsible for upholding our Values and reputation. Our Values guide our decisions and behavior, and we support each other in doing the right thing.

Everyone's Responsibilities

The Code of Ethics applies to all CoreCivic employees, officers, members of the Board of Directors and all subsidiaries of CoreCivic, Inc. We all need to do things the right way and support each other.

You are expected to:

- Know and follow the rules (standards, policies, regulations and laws) that apply to you, including the Code of Ethics and Facility Standards of Conduct.
- Reflect our CoreCivic Values in all of your work.
- Contribute to a productive work environment.
- Be responsive to each other and those entrusted to our care.
- Speak up about misconduct and mistreatment.
- Support others who report; never contribute to retaliation.
- Seek help or guidance when needed.

FACILITY STANDARDS OF CONDUCT

Facility Standards of Conduct are designed to complement the Code of Ethics and other CoreCivic policies by identifying a short list of key standards that must be top of mind while working in a CoreCivic facility.

Facility Standards may differ among entities to reflect different missions. The typical [Facility Standards of Conduct](#) are attached as an Appendix to this Code. You can locate the Facility Standards of Conduct that apply at your facility under **CoreCivic Policy 3-3: Code of Ethics**, in the policy library for your facility.

RETALIATION

CoreCivic encourages employees to report possible violations of the Code and prohibits retaliation as a result of making a report. Preventing retaliatory conduct is everyone's responsibility. For more information, see [Preventing Retaliation](#) on page 19.

Special Responsibilities of Leaders and Supervisors

Leaders, supervisors and corporate officers have a special role. We need them to foster a healthy, supportive work environment and help those whom they supervise do things right. To set the standard, if you lead or supervise others – at any level – you are expected to:

- Promote our CoreCivic Values every day.
- Foster a positive work environment.
- Encourage employees to speak up and share information.
- Model values-based behavior and lead by example.
- Recognize and praise ethical conduct that reflects our Values.
- Consistently correct behavior that does not uphold our Values.
- Respond to any reported concern professionally and respectfully.
- Take action to resolve concerns fully and promptly.
- Avoid retaliation and take action to stop it if you see it happening.
- Seek help or guidance when needed.

INTEGRITY INTO ACTION: ADDRESSING A CONCERN AS A SUPERVISOR

Supervisors must act with integrity and make sure others do so as well. Fortunately, supervisors have a broad support network. If you are a supervisor at CoreCivic, take the following steps when an employee comes to you with a concern:

1. Listen thoughtfully to the reported concern.
2. Apply the Code and our other policies to address the concern.
3. Work with available resources, as needed, or refer the concern to someone who is in a better position to resolve it.
4. Treat the information reported and the identity of the reporter as confidential, sharing only on a “need to know” basis as required to address the concern.
5. Follow up with the person who raised the concern to let them know it was addressed.

An employee’s concern may raise challenging issues that you may not have the ability or authority to address alone. In those cases, you may need to work with another person or department, such as your supervisor, a department head or other subject matter expert. Get to know the resources available to you listed in [Making a Report](#) on page 15.

INTEGRITY INTO ACTION: A Guide to Making Good Decisions

Saying we want to do the right thing is easy, but knowing how to make the right choice isn't always simple. We expect all CoreCivic employees to avoid illegal conduct, but that's only a starting point. Below are three simple steps to help identify ethical issues and turn Integrity into Action.

IDENTIFY

- Know the rules that apply to you and your work.
- Be aware of what's going on around you.
- Listen to your "gut" or instincts.

EXAMINE

- Does the action follow the CoreCivic Code of Ethics?
- Does it meet CoreCivic policy, facility contract obligations and post orders?
- Does it line up with the company's Values?
- Does it make me proud to work for CoreCivic?
- Does it make me proud of my actions?

ACT

- **DECIDE** – if you answered "yes" to all of the above questions, it's probably OK.
 - If the answer to any of them was "no," then don't do it.
 - If the question involves someone else's actions, help them make a better choice.
- **ASK** – if you are not sure, ask. Ask a trusted colleague, a supervisor or a subject matter expert, or use the Ethics Line.
- **REPORT** – if you believe misconduct occurred, report it. Report it to a supervisor or other manager, or use the Ethics Line.

Not sure about your options for asking a question or reporting misconduct? See [Speaking Up and Seeking Help](#) on page 14.

SPEAKING UP AND SEEKING HELP

Speaking up makes it possible for us to address issues. We do not retaliate against each other or allow others to be retaliated against for speaking up.

Speaking Up

Everyone should feel free to share ideas for improvement or concerns and should be encouraged to report misconduct. At CoreCivic, speaking up is a basic part of being a professional and exhibiting integrity. Speak up right away; the longer you wait, the worse a problem may become.

Also, many of the rules and regulations we operate under are complex. Sometimes it's not clear how to apply a rule or if there is even a rule that applies.

If you have a question about whether something should be reported or if you do not know how to handle a situation, seek help. CoreCivic has invested in resources to help all of us do things the right way. Use them. Guidance is available from any of the resources listed in [Making a Report](#) on page 15.

Remember, reporting misconduct is a serious matter, so your report needs to be made in good faith. Bad-faith reports – reports that are dishonest or made with the intent to harm someone – may result in disciplinary action.



Making a Report

INTEGRITY INTO ACTION: GOOD-FAITH REPORT

- Q.** When I submit invoices for processing and payment, I check each invoice for accuracy. On one invoice, I realize that the vendor contact has the same unique last name as the CoreCivic director of that program. This seems unusual, but I feel it is not my job to report it. Should I speak up?
- A.** Yes. If you are concerned about a possible conflict of interest, even if you are not sure, speak up or seek guidance. Making the report allows the company to investigate and find out if an actual problem exists.

Local and Facility Support Center (FSC) Resources

Reaching out to a supervisor or a local or departmental resource is often the best way to deal with a concern, as he or she may be able to address it right away. Consider the following local and departmental resources when you need to speak up or seek guidance:

- Your supervisor
- Facility or departmental leadership
- Local subject matter expert (for example, Human Resources or Quality Assurance)

In some cases, however, a local or departmental resource may not be the best option. In that case, consider these resources:

- Division, Business Unit or subsidiary leadership
- FSC subject matter expert
- Ethics and Compliance

Ethics and Compliance

You can contact members of Ethics & Compliance directly at the FSC or through the Ethics Line, any time. It provides a safe way for you to report misconduct and to raise, explore and resolve concerns. The office is guided by principles of independence, fairness and confidentiality, and it seeks to treat all CoreCivic employees equally.

Ethics and Compliance works with employees and managers throughout the company to understand and address issues. It provides services including:

- Training employees and managers on ethics and compliance topics.
- Conducting periodic assessments of ethics and compliance risk.
- Working with management at all levels to promote integrity in our operations and business dealings.
- Managing reports to the Ethics Line.

Ethics and Compliance is led by CoreCivic's Chief Ethics and Compliance Officer (the CECO). The CECO reports directly to the President and CEO and to the Chair of the Risk Committee of the Board of Directors. The CECO is supported by the corporate Ethics and Compliance staff and by Ethics Liaisons at facilities throughout the organization.

What Is an Ethics Liaison?

Ethics Liaisons work to:

- Connect CoreCivic facilities and subsidiaries to corporate Ethics and Compliance, and help us work together more effectively.
- Support and strengthen – not replace – ethical leadership and culture building by our leaders.
- Coordinate monthly and special ethics and compliance projects and communications.
- Help Ethics and Compliance ensure that messages and trainings are relevant, helpful and effective.
- Provide a resource to staff about options for getting questions answered and concerns addressed. Liaisons **are not** alternative reporting paths or investigators.

The liaison is a collateral duty role that requires an application process. If you are interested in serving as an Ethics Liaison, contact your Warden/Administrator or Ethics and Compliance.

THE ETHICS LINE

CoreCivic provides the Ethics Line for asking questions, raising concerns and reporting misconduct. It gives you a way to take action when you believe your concerns cannot be addressed in another way. You can also use it if you wish to remain anonymous. The Ethics Line is available 24 hours a day, seven days a week at 1-800-461-9330 or www.corecivic.com/ethicsline.

The Audit Committee

If you have concerns about accounting, internal accounting controls or financial auditing, you can share those using the Ethics Line. You also can communicate with the Audit Committee of the Board of Directors. To do so, contact CoreCivic's Corporate Secretary at 5501 Virginia Way, Suite 110, Brentwood, Tennessee, 37027.



What Happens When You Make a Report through the Ethics Line?

A professional call center agent answers calls to the Ethics Line. The call center agent will take your report and explain how you can check progress on your report, even as an anonymous caller. The call center agent will ask you to describe your concern or question. Please provide as much information as possible and regularly follow up with the Ethics Line in case further questions arise.

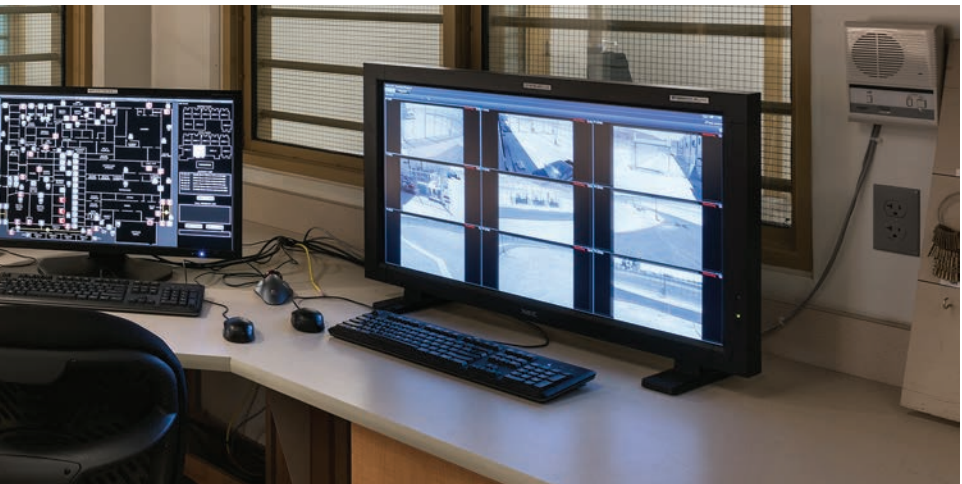
The call center sends the report to Ethics and Compliance. Ethics and Compliance promptly reviews each matter. Ethics and Compliance staff will then contact you directly if you have provided your contact information or leave a message with the call center for you to pick up. Ethics and Compliance may work with other departments to address or resolve the matter or refer you to another process such as the employee grievance process. Due to privacy and other reasons, it may not always be possible to give you detailed information about how your report was resolved.

It is helpful if you identify yourself when making a report so the company can better address your concerns. Ethics and Compliance follows strict confidentiality and non-retaliation policies to protect those who use the Ethics Line. Information may be shared on a “need to know” basis as required to evaluate and address the matter. If you are not comfortable identifying yourself, you can remain anonymous simply by informing the call center agent.

You also can report through the Ethics Line on the Internet – www.corecivic.com/ethicsline. If you report online, the same basic process applies, except you make your report and communicate with Ethics and Compliance using the Ethics Line website instead of the call center. All CoreCivic employees have access to the Ethics Line regardless of location or subsidiary.

ANONYMOUS REPORTING

- Q.** One of my colleagues told me that corporate will be able to see my caller ID if I call the Ethics Line. Is that true?
- A.** No. It's not. Ethics Line calls are received through a third-party call center. Ethics and Compliance has no way to know your identity unless you provide identifying information.



Investigation Process and Disciplinary Action

CoreCivic addresses reports of Code violations promptly and fairly. We conduct internal investigations to determine what happened and what should be done to correct the situation.

Internal investigations are conducted by CoreCivic's General Counsel Office of Investigations (GCOI), which is part of the Legal Department. These investigations are also carried out by facility investigators who have been trained by the GCOI, the appropriate point of contact at subsidiaries, or outside consultants. Investigators include CoreCivic staff, as well as outside consultants in some cases. Investigators are trained to oversee investigations fairly and impartially and are assigned to avoid conflicts of interest or other issues that could negatively affect the integrity of an investigation.

COOPERATING WITH INVESTIGATIONS

If you are asked to participate in a CoreCivic investigation, you are expected to cooperate fully and truthfully. The investigator will give you instructions at the time of the investigation that you should follow.

If you are the subject of an investigation, you must tell the truth. You will have a chance to fully tell your side of the story. You may also identify any witnesses, facts or evidence that should be considered. If you are asked to be interviewed or write a statement, it is your duty to tell the *whole truth*.

If you have questions or concerns about an investigation, you can ask the investigator or use the Ethics Line.

EMPLOYEE GRIEVANCE AND PEER REVIEW PROCESS

If you believe you've been unfairly disciplined, you may file an employee grievance. You must file the grievance within the time limits set by policy. Ask your facility's HR Manager if you have any questions about how to file a grievance or how the process works. See **CoreCivic Policies 3-6-01** and **3-6-02: CoreCivic Peer Review Procedures** for more information about grievances and the peer review process.



Preventing Retaliation

Retaliation is treating someone differently, in a negative way, because he or she reported misconduct, filed a complaint, participated in an investigation or voiced a concern.

Trying to punish or “get back” at someone who reports misconduct or speaks up about a concern is wrong. It harms our team and our work. Retaliation can take many forms, such as:

- Demotion, suspension or firing
- Refusal to promote
- Change of work duties or assignments
- Threats or verbal abuse
- Isolation or keeping someone from normal activities

Retaliation is a violation of our policies and the Code. Retaliation discourages speaking up, which keeps us from learning information we need to know. It hurts business and makes us less safe and more vulnerable to risky conduct by others. If you experience or witness retaliation, speak up and seek guidance through one or more of the resources in [Making a Report](#) on page 15.

Right to Disclose

Your right to report misconduct on an identified or anonymous basis to CoreCivic or government officials is protected by law. This includes misconduct such as:

- Gross waste, mismanagement or abuse of authority
- Violations of laws related to government contracts, grants or funds
- Evidence of a substantial and specific danger to public health and safety

INTEGRITY INTO ACTION: A GOOD CHOICE

Alice reported her supervisor for falsifying documentation. The next week, the supervisor denied her paid-time-off (PTO) request and ignored her requests for bathroom breaks. Alice’s co-worker Eric heard about the PTO denial and saw the problem with bathroom breaks. He believed the supervisor was doing it because Alice made the report about falsifying documentation.

Eric reported the supervisor’s actions to the Warden. The Warden acted quickly to have the report investigated, then followed through on the investigation to end any retaliatory conduct. The entire shift felt safer. Even though he was not the victim himself, Eric lived CoreCivic’s Values and helped Alice.





**WE MEET OUR
OBLIGATIONS WITH
HONEST BUSINESS
PRACTICES.**

We conduct our business with honesty and in good faith because it is the right thing to do. As a provider of government services, we must always operate in compliance with our commitments and show ourselves to be responsible and trustworthy.

SERVING OUR GOVERNMENT PARTNERS

We serve our partners in government with integrity, honesty and dedication. As a responsible partner, we meet our contractual obligations, comply with the specialized rules that apply to government business and strive to avoid even the appearance of improper conduct.

Obtaining Government Business

CoreCivic competes fairly for government business by complying with all acquisition and procurement regulations. For our business with the federal government, this means complying with the Federal Acquisition Regulation (FAR). State and local customers often have similar regulations. Together with our contracts, these regulations define our primary obligations to our government partners.

Procurement regulations require procurement officials to maintain objective fairness at all times. If, as part of your job for CoreCivic, you work on obtaining government business, you must:

- Keep proprietary information confidential.
- Maintain accurate records.
- Submit good-faith proposals.
- Maintain appropriate relationships with third parties.
- Never seek to obtain information that would compromise the integrity of the procurement process.

WHAT INFORMATION IS NOT ACCEPTABLE TO OBTAIN DURING PROCUREMENT?

- Confidential government documents explaining the source-selection process
- Government evaluations of proposals or competitive comparisons
- Confidential competitor documents such as those explaining costs, prices or strategies

We also must avoid any situation that could present an “organizational conflict of interest.” An organizational conflict of interest may be present if we:

- Assist the government in designing a request for proposals (RFP) and then bid on the RFP.
- Contract with a government partner to evaluate a proposal we have submitted or evaluate our own performance under a different contract.
- Have unfair access to information useful to preparing a bid or proposal.

If you need help complying with the FAR or other government procurement requirements, please contact Ethics and Compliance.



Avoiding Kickbacks and Bribery

A “kickback” is something of value that is exchanged after a government contract has been improperly awarded. Kickbacks and bribes are not limited to money – they can be anything of value. You must:

- Avoid kickbacks, bribes and activity that might lead a reasonable person to question your ability to act impartially or with integrity.
- Never offer or accept anything of value from a government official, subcontractor or vendor outside of a contract.

Employing Former Government Personnel

Current government employees may be restricted from contact with private companies, like CoreCivic, who do business with the government. Former government employees also may be prohibited from doing certain kinds of work for CoreCivic. If you are involved in hiring or managing current or former government personnel, you must:

- Consult Ethics and Compliance before contacting a government employee about working for CoreCivic, whether as an employee or as a contractor.
- Follow all laws and rules that apply to government employees regarding private sector employment.
- Be aware of the restrictions on activities of former government employees who work for CoreCivic.

For more information, see ***CoreCivic Policy 3-34: Restrictions on Employment Discussions with Current Government Employees and Responsibilities of Former Government Employees.***

Maintaining Accurate Records

CoreCivic, like every provider of government services, is required to keep accurate records. To do so, you must:

- Be honest in your record-keeping practices.
- Properly record your time worked, forms completed and expenses paid, using the guidance provided for CoreCivic’s jobs and facilities.
- Follow all applicable procedures and rules for financial accounting, document maintenance, labor charges and legal holds.

INTEGRITY INTO ACTION: WHAT TYPES OF RECORDS ARE IMPORTANT?

All records – paper and electronic – are important, because they help us show that we have done the work our government customers have hired and paid us to do. Cutting corners or documenting something that did not occur is never a good idea and could lead to significant consequences for CoreCivic (such as expensive investigations, negative press and litigation) and the people involved.

Examples of important records include:

- Training records
- Staffing documentation, including shift rosters
- Logs that show rounds or regular checks on a resident population
- Count sheets
- Time cards
- Meeting minutes

Remember, these are only examples. Every paper and electronic record you complete is important.

For more information, refer to **CoreCivic Policy 1-15: Retention of Records** or your local facility policy.

QUALITY ASSURANCE DIVISION

The Quality Assurance Division helps us maintain quality operations, compliance with our government partner contract requirements and American Correctional Association accreditation at our facilities. Every year, Quality Assurance conducts audits at our facilities. These audits are rigorous and are not announced ahead of time. The Division also supports the efforts of facility Quality Assurance Managers. These managers work on a day-to-day basis to promote quality and compliance throughout our company. You must cooperate fully with Quality Assurance processes and provide full, complete and accurate information when requested by local or FSC Quality Assurance personnel.

INTEGRITY INTO ACTION: ACCURATE RECORDS

- Q.** The Training Manager noticed that the second shift's CPR training was canceled in December. She knows that the government partner requires all employees to complete CPR training annually. She thinks that an easy fix would be to prepare a roster for past CPR training, request signatures and file it in the binder with the other rosters. No one would know, and she is pretty sure everyone has had CPR training in the past. What would you tell this Training Manager?
- A.** Don't do it! Our government partners and CoreCivic count on our records to be true. Instead, encourage her to ask for help in correcting the situation, ensuring the documents are accurate and preventing this from happening again. Her facility leadership or a local or FSC subject matter expert, such as Quality Assurance or Learning and Development, can help.

Submitting Requests for Payment to Government Partners

When CoreCivic submits a bill or request for payment to the government it is known as a “claim.” CoreCivic must submit accurate claims to our government partners. It is both against the law and contrary to our Values to submit false claims. If you are involved in preparing or submitting claims or records that support our claims for payment, you must:

- Take great care to follow proper record-keeping procedures so that invoices are correct.
- Make sure supporting documentation is complete and accurate.
- Never make or submit claims or invoices that you know to be inaccurate.
- Always comply fully with procedures to establish that contract obligations were met before submitting claims to our partners.
- Speak up if you are aware of an issue with a claim or if you have concerns that an internal control process involving claims is not working properly.

FEDERAL ACQUISITION REGULATION (FAR) MANDATORY DISCLOSURE RULE

As a government contractor, we comply with the FAR Mandatory Disclosure Rule. In order for CoreCivic to comply, you must speak up about any violation or potential violation involving:

- Bribery
- Fraud
- Gratuities
- Conflicts of interest
- Overpayment by the government to CoreCivic



Cooperating with Government Investigations and Audits

Whenever you are asked to take part in an official inquiry, audit or investigation, you must:

- Cooperate fully.
- Give honest and complete responses to questions.
- Promptly provide accurate records as requested.
- Always tell the truth.
- Never falsify documents.
- Never manipulate or mislead any auditor or investigator, whether internal or external.

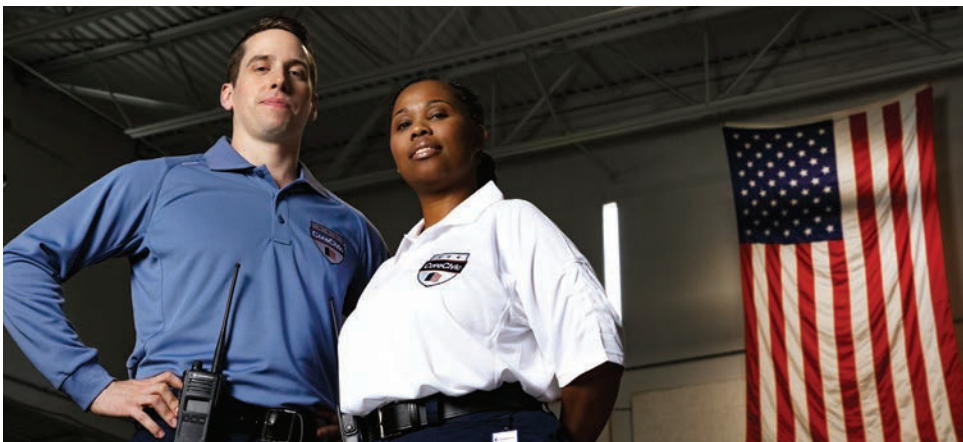
RECORDS RETENTION

No CoreCivic employee is ever authorized to destroy or alter any company record based on a concern that the record could be harmful to CoreCivic in a potential investigation, audit or litigation. Employees must comply with CoreCivic's records retention policy and procedures, as well as any "hold" notices issued under the policy.

For more information, refer to **CoreCivic Policies 1-10: Response to Agency Requests** and **1-15: Retention of Records**.

INTEGRITY INTO ACTION: AUDIT INTEGRITY

- Q.** As we were preparing for an upcoming audit recently, a supervisor said, "Check the documents and make them right." The documents are usually completed by other employees, and I don't have the authority to change them. She looked me straight in the eye, and said, "Make. Them. Right. You know what I mean." I feel uncomfortable about this. What should I do?
- A.** You are right to be concerned. We need to be absolutely sure our records are accurate. Immediately seek guidance about what is acceptable to do in preparation for an audit or inspection when records are missing or incomplete. Your resources include other supervisors, the facility QA Manager, the FSC QA team, and Ethics and Compliance.



Participating in the Political Process

Because CoreCivic works directly with government partners, we must be careful when participating in the political process. Our participation in political activities must be up to the standards of integrity that are required for government contractors. For more information, see **CoreCivic Policy 3-28: Government Relations**.

Corporate Political Activity

CoreCivic takes great care to comply with all applicable laws and regulations when making corporate political contributions. This helps ensure the integrity of our involvement in the political process. Certain types of political contributions are not allowed. Some activities requiring special consideration include:

- All political contributions by or in the name of the company
- Any activity related to a company-sponsored political action committee
- Company reimbursement for any direct or indirect payments related to a political party or candidate.
- Use of company facilities for political events
- Lobbying public officials

LOBBYING

Only designated persons are permitted to lobby for or on behalf of the company. If you are not specifically authorized to do so, do not engage in any activity that could be considered lobbying on behalf of CoreCivic and do not retain others to do so.

If you do engage in lobbying or related activities on behalf of CoreCivic, or manage others who do so, you must understand your compliance obligations. The company has established policies and procedures to assist you and maintain compliance with registration and disclosure obligations.

Under longstanding CoreCivic policy, CoreCivic does not lobby for or against policies or legislation that would determine the basis for or duration of an individual's incarceration or detention.

Personal Political Activity

As individuals, each of us has the right to participate in the political process. You may engage in personal political activities on your own time. However, you must keep them separate from those of CoreCivic. Also, your political activities should not interfere with your duties as a CoreCivic employee. When engaging in personal political activities, you must:

- Avoid creating the impression that your own personal political views are shared by or are the political views of CoreCivic.
- Consult Ethics and Compliance before running for political or governmental office to avoid potential conflicts of interest or the appearance of conflicts of interest.
- Not use CoreCivic assets for personal political activities.
- Not allow your personal political beliefs to influence your ability or willingness to work with fellow CoreCivic employees.

Gifts to Government Officials

Gifts that may be legal when given to a business partner can be illegal when given to a government official or employee. No employee or agent of CoreCivic is authorized to:

- Offer, promise or provide anything of value to a public official based on an official act by the official.
- Give a gift to a government official that does not comply with the gift rules that apply to the official.

Gift rules can be complex and are different for different public officials. Also, special procedures may apply in order to ensure compliance with foreign anticorruption laws if we explore or seek to do business in non-U.S. jurisdictions. CoreCivic has adopted compliance procedures to avoid violations and the appearance of impropriety. In general, this policy requires you to obtain pre-clearance before offering a gift to a government official or employee.

The definition of a “gift” is very broad – it means anything of value and includes gifts, meals, entertainment, travel and accommodations. If you are not sure or do not have time to pre-clear a gift, you should not give it.

INTEGRITY INTO ACTION: OFFERING GIFTS TO GOVERNMENT OFFICIALS

Q. I have developed a strong working relationship with the state monitor for our contract. She recently reached her 10-year anniversary with the state. I would like to take her and her spouse to dinner to recognize the achievement and show my appreciation. May I do it?

A. Not unless you receive prior approval. In this situation, Ethics and Compliance will work with you to determine whether there is an appropriate way to recognize the monitor without violating any rules or creating the appearance of improper conduct.

For more information, see **CoreCivic Policy 1-9: Gifts to Government Officials**.



PROMOTING INVESTOR TRUST

We keep reliable records and maintain appropriate internal financial controls in order to make timely, full and accurate public disclosures and reports to the Securities and Exchange Commission. We do not take advantage of inside information for personal financial gain.

Reporting and Disclosing Company Information

As a publicly traded company, CoreCivic submits reports to the U.S. Securities and Exchange Commission and publicly discloses business and financial information, consistent with our obligations under the securities regulations and New York Stock Exchange rules.

To protect the company and promote investor trust, our public disclosures must be timely, full and accurate. If, as part of your job, you provide information for or are responsible for the preparation or review of public disclosures, you must:

- Make sure that the information you provide is correct and complete.
- Prepare and submit public disclosures in a timely manner.
- Ensure public disclosures are complete and accurate to the best of your knowledge.
- Speak up if you think an event or occurrence requires additional disclosure or a past disclosure should be updated or corrected.

Keeping Accurate Accounts and Records

In order for our public disclosures to be complete and accurate, our business and financial accounts and records must be accurate. We also must maintain and adhere to effective internal controls and procedures for financial reporting. To help meet these objectives, you must:

- Prepare all accounts and records honestly and with care.
- Follow our fiscal management and records retention policies.
- Adhere to timekeeping and expense reporting guidelines.
- Follow all accounting and disclosure controls and procedures.
- Promptly report any misstatements, fiscal policy or internal control violations or instances of financial fraud.

WHAT DO ACCOUNTS AND RECORDS INCLUDE?

- Expense accounts
- Vouchers
- Bills
- Time reports
- Payroll records
- Disclosure documents

AUDITS

CoreCivic works with internal auditors and a registered independent public accounting firm to make sure our internal controls are effective and our financial reporting is accurate and complete. You must cooperate with and give accurate information to these auditors. Never attempt to improperly influence, mislead or manipulate an auditor. If you have a question about a request by any auditor, contact your supervisor or an appropriate subject matter expert, or use the Ethics Line.

Preventing Insider Trading

“Inside information” (also referred to as “material, non-public information”) is information about CoreCivic, a business partner or a competitor that is not known to the public and that an investor might consider important in making an investment decision. Improper use or disclosure of inside information violates CoreCivic policy and may result in personal legal liability. You must:

- Comply with the company’s insider trading policies and procedures.
- Use inside information only for legitimate business purposes, not for personal gain.
- Keep inside information confidential – share it only on a need-to-know basis and as permitted by any applicable confidentiality agreements.
- Ask a supervisor when you have questions about inside information.
- Immediately report suspected improper use of inside information.

INSIDER TRADING

Examples of inside information may include non-public knowledge of:

- New or changing services or contracts
- Earnings or dividend figures
- Changes in senior management
- Information about litigation
- Mergers or acquisitions
- Dispositions of businesses or significant assets
- Confidential information about other companies that we learn in our work for CoreCivic

Examples of improper use of inside information include:

- Buying or selling CoreCivic stock based on inside information
- “Tipping” a friend or family member who trades based on inside information

For more information, see **CoreCivic Policy 3-21: Insider Trading**.

INTEGRITY INTO ACTION: INSIDE INFORMATION

- Q.** I just found out that we are expecting a big new contract. I haven't seen a press release yet, but my team has a lot of preparation work to do, so I want to notify the other members of my team so we can get started. May I do so?
- A.** Be careful about telling anyone, even other employees, of a new contract award. The news might be considered inside information that is not yet appropriate to share with others. Check with your supervisor or an appropriate subject matter expert to see whether your team members have a legitimate "need to know" at this time.



DEALING FAIRLY WITH THIRD PARTIES

Our customers and communities benefit from free and fair competition. We are committed to conducting business in good faith and dealing fairly with our business partners.

Dealing Fairly with Competitors

CoreCivic competes fairly with other companies for business and complies with laws and regulations designed to promote fair competition. To compete fairly, you must not:

- Misrepresent our services or our competitors' services.
- Infringe on copyright and other intellectual property.
- Access or obtain confidential competitor or procurement information.
- Share or discuss pricing or proposal information with competitors.

INTEGRITY INTO ACTION: COMPETITOR INFORMATION

- Q.** I recently received an e-mail note from a government customer that was meant for a competitor of ours on a current bid. It asks for clarification on the price and includes our competitor's proposal as an attachment. I don't think we should have this information. Am I right?
- A.** You are correct. To make sure there is a level playing field, competitors for a government contract must not know the confidential information of other bidders. Do not forward or print the e-mail, or open the attachment. Seek guidance immediately on how to notify the customer of the mistake and destroy the e-mail.

Dealing Fairly with Subcontractors and Vendors

Meeting our business objectives often requires the use of third-party goods and services, including using subcontractors, vendors and consultants. We respect the rights of our suppliers and deal fairly with them. To do so, you must:

- Base business decisions on quality and value.
- Avoid conflicts of interest.
- Protect others' intellectual property and confidential information and use it only for proper purposes.
- Not solicit gifts or personal benefits.
- Maintain professional boundaries.
- Meet our contractual obligations.



WHAT WE EXPECT OF OUR SUPPLIERS

CoreCivic's service and reputation are linked to the conduct of our suppliers, subcontractors and consultants. We expect our suppliers to adhere to the same standard of ethical behavior outlined in the Code and to support our P.R.I.D.E. Values. We expect our suppliers, subcontractors and consultants to:

- Participate honestly and in good faith during business activity.
- Protect CoreCivic proprietary, confidential and brand information.
- Maintain accurate records and provide access as necessary.
- Comply with applicable government contracting regulations.
- Disclose all information honestly, accurately and in a timely manner.
- Source goods and materials responsibly.
- Promote employee and environmental safety.



WE KEEP OUR FACILITIES AND COMMUNITIES SAFE.

We ensure safety and security to protect everyone who uses our properties and facilities, as well as the communities we serve.



KEEPING WORKPLACES SAFE

We keep our workplaces safe to protect everyone who lives, works or volunteers in or who visits our facilities. When we work in a safe environment, we can focus on doing our best for each other and those in our custody.

CoreCivic has in place extensive policies and procedures designed to keep our workplaces safe and secure. You must:

- Know and strictly follow CoreCivic safety and security policies and procedures.
- Support others in keeping workplaces safe and following policy and procedure.
- Never tolerate violence or unapproved weapons in the workplace.
- Speak up when you identify safety concerns.
- Respond constructively when safety concerns are brought to your attention.

HOW TO REPORT SAFETY CONCERNS

CoreCivic Policy 8-2: Facility Safety Authority/Team Safety Program provides specific procedures for reporting safety concerns and making suggestions to improve safety. Each facility has an employee assigned as the Facility Safety Authority and a dedicated telephone extension for safety reporting, as well as a Team Safety Suggestion Box.

- Reports or suggestions can be made directly to the Facility Safety Authority, verbally through the dedicated telephone extension or in writing through the suggestion box.
- Situations that pose a risk of immediate harm to person or property should be reported immediately to the Facility Safety Authority or to your supervisor. For workplace violence situations, see **CoreCivic Policy 8-13: Workplace Violence**.

The Ethics Line is an option for reporting safety-related issues, but keep in mind that Policy 8-2 has been designed specifically for safety concerns and suggestions. Also, the Ethics Line is not the best option if immediate action is needed.



Respecting Others Who Work In or Visit Our Facilities

People who are not CoreCivic employees, such as visitors and volunteers, are an important part of our work. These include government partner staff, such as contract monitors and auditors, CoreCivic independent contractors and temporary employees, subcontractor staff, attorneys, non-governmental organizations, and family and friends of residents. Following CoreCivic safety and security procedures helps keep them safe as well.

In addition, you must:

- Treat all who work in or visit a CoreCivic facility with professionalism and respect.
- Help others understand and follow CoreCivic's Code and the rules for the facility.
- Speak up immediately about any behavior that does not follow our rules or support our Values.

For more information, see **CoreCivic Policy Chapter 8: Safety/Emergency Procedures** and **Chapter 9: Security/Control**.

KEEPING OUR WORKPLACES DRUG- AND ALCOHOL-FREE

You can perform at your best only when you stay drug- and alcohol-free, so:

- Do not use alcohol or illegal drugs (including prescription medication that was not specifically prescribed for your use) before reporting to work, while at work or when performing work activities.
- Do not possess, distribute or use alcohol or illegal drugs on CoreCivic property.
- Understand and follow all the requirements of our drug- and alcohol-free policies.
- Report possible violations of our drug- and alcohol-free policies promptly.

For more information, see **CoreCivic Policy 3-15: Drug and Alcohol Program**.



SAFEGUARDING THOSE IN OUR CARE

Those in our care have been entrusted to us by our government partners. It is our duty to keep them safe and secure. We are trusted to prevent mistreatment of any resident or visitor, whether by staff or other residents.

Fulfilling Our Duty to Protect

We have a duty to protect individuals in our care and their visitors from harm. This includes harassment, sexual abuse, self-harm and other threats of violence, whether by staff, residents or others. If you see that misconduct or abuse is about to happen, take prompt action to prevent it. If you see it happening, act responsibly to end it.

We also have a duty to report promptly any misconduct toward a resident or visitor, including physical or sexual abuse. To make a report, follow the reporting requirements that apply to the situation. For example, for a report of sexual assault, follow the procedures in **CoreCivic Policy 14-2: Sexual Abuse Prevention and Response**. If you're unsure about a situation, seek guidance from a supervisor or subject matter expert, or call the Ethics Line.

SEXUAL MISCONDUCT AND SUICIDE PREVENTION

To keep residents safe, we must maintain a special focus on preventing sexual misconduct and self-harm.

The Prison Rape Elimination Act is a federal law that makes it a crime to commit acts of sexual misconduct in a correctional setting. CoreCivic takes sexual misconduct prevention and response very seriously: we do not allow sexual abuse, harassment or misconduct in any form, and we promptly and thoroughly investigate when an allegation is made. You must follow all required reporting procedures.

For more information, see **CoreCivic Policy 14-2: Sexual Abuse Prevention and Response**.

Likewise, we must make every effort to identify potential suicidal behavior by residents and respond immediately to any attempt at self-harm.

For more information, see **CoreCivic Safety Policy 9-19: Suicide Prevention/Risk Reduction**.

INTEGRITY INTO ACTION: USE OF FORCE

Use of force by staff is sometimes required in a correctional setting. However, force must be used only as prescribed by policy and only when required for the protection of self, residents or others. Force may never be used to punish or retaliate against someone. If you use or observe a use of force, you must report it. You also must provide complete and truthful incident information when you use or observe a use of force.

For more information, see **CoreCivic Safety Policy 9-1: Use of Force and Restraints**.

Maintaining Secure and Contraband-Free Facilities

Contraband endangers everyone at CoreCivic – residents, staff and visitors alike. Each of us has a duty to help make sure our facilities are free of contraband, so you must:

- Never bring contraband into our facilities.
- Report any suspicion of contraband immediately.
- Not do anything that would allow others to bring in or transfer contraband.
- Not assist with contraband or look the other way.

EXAMPLES OF CONTRABAND

- Firearms, explosives and weapons
- Prohibited tools
- Unauthorized equipment, including restraints and tactical equipment
- Illegal drugs, controlled substances, alcohol and common products used as intoxicants or hallucinogens, including unauthorized medications
- Cash and cash equivalents
- Unauthorized nicotine products
- Unauthorized electronics and accessories, such as flash drives, cell phones, pagers, batteries and chargers

INTEGRITY INTO ACTION: MEDICINES AT WORK

Q. One of my co-workers is sick and has brought medicine that we're not supposed to have on-site into the facility. I don't think he intends to break the rules – he's just trying to work while sick. I told him he should tell our supervisor, but I'm not sure he will. Is there anything else I should do?

A. Encouraging your co-worker to self-report is a good step, but remember that you have a separate obligation to report contraband. Promptly inform your supervisor, who will determine what action to take next.

Access to Health Care

Another way we safeguard residents is by helping them get access to appropriate physical and mental health care in the facilities we manage. To support this goal, you must:

- Look out for residents' well-being by following our health services–related policies and protocols.
- Speak up whenever you have a concern about a resident's health.
- Do your part to ensure that adequate care is provided if you are a provider or have oversight responsibility for an employed or contracted provider.

INTEGRITY INTO ACTION: MEDICAL CARE FOR RESIDENTS

- Q.** I'm not on the medical team, but I noticed that one of the residents just doesn't seem right this week. His health seems to be getting worse. He attends pill call, so I know he's receiving some kind of medicine. Should I assume that he is getting proper treatment?
- A.** Don't assume that the medical staff has noticed what you have! Speak up and make sure the resident receives the medical attention he needs. If you have a concern, you are right to say something even if you think the medical staff probably already knows about it.

For more information, see **CoreCivic Policy Chapter 9: Security/Control** and **Chapter 13: Medical/Health Care Services**.



RESPECTING OUR COMMUNITIES

We protect the people in the communities we serve by keeping facilities safe and helping residents improve. We also protect our property and our communities by protecting the environment – conserving resources and avoiding environmental harm are smart business and are the right thing to do.

Protecting Our Communities

Protecting the communities we operate in and serve is central to our mission. You support this mission when you:

- Strictly follow safety and security protocols, such as those related to
 - Resident accountability,
 - Perimeter control,
 - Contraband prevention, and
 - Safe, secure transportation of residents.
- Ensure that resident programming standards are met by following program guidelines and making sure courses are completed and related documentation is accurate.
- Are vigilant and promptly report issues and concerns that could impact community safety.

INTEGRITY INTO ACTION: A TIRED TRANSPORTER

Q. I work in resident transportation and am considering a “side gig” driving for a ride-sharing service. I have several friends doing it, and since I already drive for a living, I think it would be a good fit. Is there anything else I need to consider?

A. Yes. You need to consider how this “side gig” could affect your ability to get enough rest. You could put residents and the larger community at risk. You also may be subject to safety regulations that require you to take breaks between transports. Since this may conflict with your work for CoreCivic, you need to talk to your supervisor and seek approval before pursuing this opportunity.

Respecting the Environment

As a CoreCivic employee, you support our P.R.I.D.E. Values and help minimize waste and protect our property and the environment when you:

- Use approved methods to handle, store and dispose of toxic or hazardous materials.
- Report any spills or leaks to management.
- Comply with all applicable environmental laws and company policies, including rules for acquiring, using, labeling and disposing of hazardous materials.
- Meet the requirements of all environmental permits.
- Suggest ways to reduce energy and water consumption, curb waste and protect the local ecology.
- Pursue innovative design, construction and maintenance strategies that make CoreCivic facilities sustainable and environmentally friendly.

If you have a question about the rules that apply to you, ask your supervisor. If you have a concern that we are violating environmental laws or otherwise putting our properties or the environment at risk, contact Ethics and Compliance.

For more information, see **CoreCivic Policy Chapter 7: Physical Plant** and **Policies 8-4: Hazardous Materials Shipping** and **8-5: Control of Hazardous Chemicals – Materials**.

WE SUPPORT A CULTURE OF RESPECT AND INCLUSION.

We support a culture of respect and inclusion because everyone has the right to be respected and treated fairly. By embracing a wide range of experiences and backgrounds, we learn from each other and expand our abilities.



FOSTERING A RESPECTFUL ENVIRONMENT

We treat each other with dignity. We keep our work environment free of prohibited harassment and discrimination. We recognize our obligations to employees and work to fulfill them. When we do so, we create an attractive workplace where we can better serve those who rely on us.

Showing Respect and Preventing Harassment

Show respect for other people by thinking about how your words and actions may affect them:

- Do not use language that is abusive or threatening toward others.
- Do not allow bullying or any form of prohibited harassment or discrimination.
- Never use physical violence, threats or intimidation.
- Speak up if you see or hear an act of bullying, harassment, intimidation or discrimination.

CoreCivic provides policies to help you handle concerns of harassment or discrimination. See **CoreCivic Policies 3-17: Harassment – Sexual Harassment** and **1-5: Equal Employment Opportunity** for more information.

EXAMPLES OF INAPPROPRIATE BEHAVIOR

- Making unwanted sexual advances or pressuring another person to engage in a relationship
- Displaying sexually suggestive, racist, sexist, xenophobic or obscene objects, text or images
- Bullying or threatening others verbally or physically
- Forwarding an e-mail containing inappropriate, sexually explicit text or images

INTEGRITY INTO ACTION: PREVENTING BULLYING

- Q.** I recently moved to the night shift. I can't believe how my new supervisor treats people! She uses obscene and demeaning language and is always threatening to fire someone. What should I do?
- A.** The conduct described is not in line with CoreCivic's Values or the Code. You may help her to understand how her words are affecting you and others by talking to her about it. Or, talk to her supervisor, your Human Resources representative or the Warden/Administrator. If informal approaches do not work, you have the option of filing a formal grievance or using the Ethics Line.

INTEGRITY INTO ACTION: QUESTIONABLE E-MAIL

- Q.** My co-worker sometimes forwards jokes to others and me using work e-mail. Sometimes they are funny, but recently I've noticed that they involve political topics and use borderline offensive language. I'm concerned that someone might take offense or forward them to someone else who will. I like him, so I don't want to get him in trouble. Should I talk to him?
- A.** Talking to your co-worker is a good step, but if the e-mails could cross the line into harassment or discriminatory conduct that violates this Code or our policies, you should also report it. You may be saving his career by stopping him before it's too late. You will also be helping your other co-workers and the company avoid future problems.



Respecting Our Obligations to Employees

We recognize our obligations to employees and the benefit of fair and just policies and practices that support those obligations; in turn, we expect our employees to fulfill their corresponding duties to CoreCivic. For example, we compensate our employees for the performance of their duties and all hours worked as prescribed by company policy and applicable law, and we expect that employees, as required, are diligent and accurate in reporting all hours worked.

See **CoreCivic Policy 3-7: Exempt/Non-Exempt Compensation** for more information.

CoreCivic also respects employees' rights under applicable labor laws, including the right to discuss wages, hours and conditions of employment with each other and non-employees.

PROMOTING EQUAL OPPORTUNITY

We are an equal opportunity employer and strive to create a workforce that reflects many different backgrounds and experiences. The diversity of our workforce makes us stronger and better at what we do and helps us attract, retain and develop the best employees.

We all have a responsibility to help keep our workplace free from discrimination. If you are involved in hiring, retaining and promoting, base your decisions on merit and adhere to company policy and processes. Do not make decisions based on any protected characteristic.

WHAT IS A PROTECTED CHARACTERISTIC?

Protected characteristics include race, color, sex, national origin, religious creed, ancestry, age, mental disability, physical disability, medical condition, genetic information, gender identity, gender expression, sexual orientation, marital status, and military or veteran status. They also include any other status or characteristic protected by applicable federal, state or local law.

Each of us must treat others with dignity and respect for our differences and expect the same in return. If you believe you or someone else has been wrongly discriminated against, report the matter immediately.

CoreCivic provides policies to help foster equal opportunity, diversity and inclusion within our workplace. We seek to create an environment in which all of us can contribute to our fullest potential. For more information, see **CoreCivic Policies 1-5: Equal Employment Opportunity, 3-17: Harassment – Sexual Harassment, 3-35: Diversity and Inclusion** and **3-2: Reasonable Accommodation**.

INTEGRITY INTO ACTION: HIRING THE BEST

- Q.** A recent applicant is very qualified. However, she appears to be several months pregnant, and it seems likely she will need to be out on maternity leave soon. I would like to offer her a job but set a start date for about six months from now. Can I do that?
- A.** You must base your hiring decision on her qualifications, not her pregnancy. We are committed to recruiting and hiring without discrimination so that we can bring the best candidates to CoreCivic for our long-term success. If you are ready to offer her the job, determine the start date in the same way as you would for any other candidate.

RESPECTING HUMAN RIGHTS

We treat all those in our care with dignity and respect. It is our duty to make sure their legal and human rights are respected and protected. Our respect for these rights helps us to ensure safety and to further our goals of promoting reentry and reducing recidivism.

Respecting the Rights of Those in Our Care

As used in this Code, a “resident” is any person entrusted to our care or custody. In other contexts, a resident may be referred to as an inmate, detainee, or client. CoreCivic also serves non-resident clients. As a provider of government services, CoreCivic is required to respect and protect residents’ and clients’ legal and human rights. All of us at CoreCivic must uphold this obligation. This includes ensuring:

- Safety, security and protection of property, including confidential information.
- Appropriate, humane standard of living.
- Access to medical care, including mental health care.
- Freedom from harassment or discrimination on the basis of race, color, sex, national origin, religion, age, disability, sexual orientation, gender identity/expression or any other status or characteristic protected by law.
- Opportunities for personal growth through rehabilitation and reentry programs as appropriate.
- Ability to communicate through visitation and correspondence.
- Ability to use the grievance process without fear of retaliation.

INTEGRITY INTO ACTION: RESPECT AND DIGNITY FOR ALL

Q. While being trained in the intake receiving and discharge area, the newest resident supervisor heard the staff member training her use a different ethnic slur or rude nickname for each resident, depending on her last name and appearance. The residents didn’t seem to notice, and they were receiving everything they needed. Does it matter how we talk to residents?

A. Yes. It matters. Our Human Rights Policy says that residents should be treated with dignity and have a right to be free from verbal abuse: “No person should ever be subjected to any cruel, inhumane or degrading treatment or punishment.” In this situation, you should speak up.

Interacting Appropriately with Residents

We always act in a professional manner with residents. Interacting appropriately means you:

- Treat residents with respect.
- Avoid situations that could lead to improper relationships.
- Report any family, business or social relationship you have directly with a resident.
- Report any family, business or social relationship you have indirectly with a resident, such as with a resident's friend or family member.
- Report any other relationship that could cause a conflict of interest or appear to do so.

PROFESSIONAL DISTANCE

Inappropriate contacts with residents include but are not limited to:

- Giving special favors to residents.
- Taking gifts, services or tips from residents, residents' family members or friends of residents. This includes handmade items, such as paintings or blankets.
- Sharing personal information with residents as you would with a friend.
- Engaging in romantic correspondence with residents.
- Taking phone calls from residents while outside the facility.
- Engaging in physical acts of a sexual or affectionate manner.
- Viewing unclothed residents improperly or unnecessarily.

Failing to maintain professional distance leads to poor decisions and can result in very serious consequences. Special favors can lead to involvement in criminal activity. Law enforcement officials can and do prosecute correctional staff for sexual conduct and contraband traffic with residents.

If you have any concerns about non-professional relationships – whether yours or a co-worker's – seek help immediately or report it to avoid more serious consequences.

INTEGRITY INTO ACTION: REQUESTS FOR RESIDENT INFORMATION

- Q.** Someone I know has recently been booked into the facility where I work. We were never close, but we were friends on Facebook. We also have many of the same friends in real life. I unfriended him online but soon began receiving messages from some of our mutual friends. They are asking me about his experiences and the conditions in our facility. What should I do?
- A.** Immediately inform the facility Warden/Administrator of your relationship with the person in question. You already did the right thing by removing your direct social media connection to him. You should also refuse to give information about him to unauthorized persons, including mutual friends.

CoreCivic has policies in place to ensure protection of the rights described above and others. For more information, see the [CoreCivic Human Rights Policy Statement](#) (included as an Appendix to the Code on page 64, available on the CoreCivic intranet on the Ethics and Compliance page and online at the CoreCivic website), **CoreCivic Facility Standards of Conduct** and **CoreCivic Policy Chapter 14: Resident Rights**.



**WE PROTECT THE ASSETS
AND INTERESTS OF OUR
ORGANIZATION.**

We protect CoreCivic assets and interests to protect our people, our property, our stockholders, our ability to compete effectively and our reputation.





AVOIDING CONFLICTS OF INTEREST

We make business decisions based on what is best for CoreCivic and those we serve, not personal reasons. Making smart decisions for the right reasons is essential to our success and reputation.

A **conflict of interest** happens when pursuing a personal interest interferes with or influences how we perform our duties for CoreCivic. All of us pursue our own interests in our personal lives, but we must guard against allowing our personal interests to influence work-related decisions.

Most conflicts of interest result from two types of personal interests:

- Financial interests
- Personal relationships (such as family and romantic relationships)

Avoiding conflicts of interest is important. A conflict of interest can lead to decisions at work that are not in CoreCivic's best interest. A conflict of interest also can put you in a difficult situation of divided loyalty, resulting in poor judgment and causing others to think you make job-related decisions for the wrong reasons.

This section includes some of the most common conflict of interest situations and guidance on how to handle them. If you find yourself in a potential conflict of interest situation, refer to the [Conflicts of Interest Quick-Guide](#) on page 53.



INTEGRITY INTO ACTION: CONFLICTS OF INTEREST QUICK-GUIDE

As an employee, how should I handle a potential conflict situation?

Identify: Review this section of the Code and pay attention to potential conflict situations.

Evaluate: Once you have identified a potential conflict, ask yourself:

- Could it affect my judgment when performing job duties?
- Could it make me appear biased or dishonest?
- Does it involve a personal financial interest or a close personal relationship?

Act: If the answer to any of the above is “yes,” it may be a conflict of interest, and you should take action to resolve the conflict. Options include:

- Not taking the planned action.
- Asking a supervisor, or seeking guidance from Ethics and Compliance.
- Disclosing the potential conflict to your supervisor to obtain approval to move forward.
- Consulting and following the applicable policy if the potential conflict is covered by a specific policy, such as the conflict situations below.

As a manager, how should I handle a potential conflict situation that is brought to my attention?

In general, potential conflict situations should be addressed at the Warden/Administrator level for facility employees and at the Managing Director or Vice President level for Facility Support Center employees. Escalate the matter to the right level and seek guidance on how to proceed.

If you are in a decision-making role for a conflict and are not sure what to do, consult with Ethics and Compliance. Ethics and Compliance has experience dealing with many different types of conflict situations and can help you reach an appropriate resolution.

Working with Family and Friends

Working with a family member or someone with whom you have a close personal relationship, such as a romantic relationship, as a co-worker or as a CoreCivic supplier or consultant, can create a conflict of interest. Disclose the relationship right away. If you find yourself getting close with a co-worker, approach a supervisor or other resource to disclose the situation before a conflict of interest emerges.

INTEGRITY INTO ACTION: WORKING WITH FAMILY RELATIONSHIPS

Q. My brother's company wants to be a CoreCivic supplier. Does this create a conflict of interest?

A. If you have the power to make decisions in the selection process, a conflict of interest exists. There may still be the appearance of a conflict of interest, even if you don't have a say. Report the situation to a supervisor, remove yourself from the selection process and do not interfere in the selection process.

For more information, see **CoreCivic Policy 3-30: Personal Relationships**.



Relationships with Residents

A non-professional relationship with a resident, whether pre-existing or one that forms while a resident is in CoreCivic care or custody, can result in a conflict of interest that can cost you your job or more. See [Interacting Appropriately with Residents](#) on page 48.

Giving and Receiving Gifts and Hospitality

Accepting gifts from people who do business with CoreCivic, or want to do business with CoreCivic, can create a conflict of interest or the appearance of one. CoreCivic has a detailed policy on giving and accepting gifts that all CoreCivic employees are required to follow. The policy defines a “gift” very broadly as “anything of value,” including meals, travel and entertainment, and it has very specific guidance on the types and values of gifts that can and cannot be accepted. If you are unsure about whether you can accept a gift, you should refuse it.

For more information, refer to ***CoreCivic Policy 3-27: Business Gifts***.

Making Investments in Our Industry

Personal investments and business ventures in our industry can create conflicts of interest. Engaging in outside business ventures are prohibited if they conflict with your job responsibilities, could compete with a CoreCivic business opportunity or could influence your judgment about CoreCivic matters. As a general rule, a small investment (less than 1 percent of a class of stock) in a publicly traded company will not result in a conflict of interest.



INDUSTRY INVESTMENT CONSIDERATIONS

- Does this investment relate to my job responsibilities or information obtained through my employment?
- Could the nature and size of my investment make me a competitor of CoreCivic?
- Could this investment create the appearance of a conflict of interest because of my position?
- Is this a business opportunity CoreCivic might reasonably want to take?

Outside Employment and Serving at Other Organizations

Employment outside CoreCivic or service in other organizations can create conflicts of interest. Consider whether your outside activity will overlap with CoreCivic's or if it could limit your ability to perform your job duties. You are required to seek approval from your Warden or designee (facility personnel) or department head (FSC and Transcor personnel) prior to accepting a new position. Additionally, be alert to changes that could create new conflicts that may require discontinuing the outside activity.

EXAMPLES OF CONFLICTS OF INTEREST

- Taking another job that keeps you from working when needed at CoreCivic
- Working for a business related to CoreCivic (supplier, partner, competitor, auditor)
- Using CoreCivic resources while volunteering for an outside organization
- Serving on a board or other governing body that could be related to CoreCivic operations

PROTECTING CONFIDENTIAL INFORMATION

We protect confidential information whether it belongs to CoreCivic, one of CoreCivic’s partners, a resident or an employee.

All of us must be sensitive to the different types of confidential information we may handle in the course of our work and know how to handle it appropriately. As a general rule, confidential information should be accessed or shared only on a “need to know” basis, which means only if there is a legitimate business need. If you become aware of an improper or unauthorized breach or distribution, report it immediately.

Below are the most common types of confidential information and guidance on how to handle them.

Information Belonging to Employees and Residents

Data privacy is important. Improper disclosure of personal data can violate privacy rights and create risks of identity theft. Breaches or unauthorized distributions of personal information also can be costly for CoreCivic. Confidential employee or resident data include personal identifying information (such as a Social Security number), protected health or medical data, and financial records.

If you handle this type of information, do so with care in accordance with policy. Immediately report any unauthorized distribution or system breach.

For more information, see **CoreCivic Policies 3-09: Employee Records, 13-58: Medical Records, 3-23: Employee Health** and **13-74: Privacy of Protected Health Information**.

INTEGRITY INTO ACTION: PROTECTED INFORMATION

- Q.** I noticed a clerk saving files to a portable storage device to finish up work at home. I think the files may have included employee Social Security numbers. Is that OK?
- A.** You should report your observation immediately. The clerk may just be trying to get the job done, but she could be compromising confidential employee data. Reporting in this situation will help the company find out if there is a problem and prevent the data from being insecurely stored or improperly removed from CoreCivic premises.

Information Belonging to CoreCivic

Information that is proprietary and confidential to CoreCivic helps us perform our work and may provide a competitive advantage that helps us be successful. It includes information that is owned or developed by the company or its agents in the course of our business and that is not generally available to the public. Examples include:

- Lists of customers and pending projects
- Quality assurance audit materials and techniques
- Information about potential business deals
- Pricing and other non-public financial data
- Strategic planning information
- Blueprints and facility security information

If you have access to this type of information, you must:

- Handle it properly according to CoreCivic policy.
- Share it only on a “need to know” basis within the company.
- Not share it outside the company unless you are authorized to do so and know that the external party is obligated to protect it.
- Be careful about where and when you discuss or view it.
- Never leave it where it could be lost or stolen.
- Return it when you stop working for CoreCivic.

Information Belonging to Government or Business Partners

We also must protect the confidential information of government and business partners. You should assume that information received from third parties in connection with CoreCivic business should be treated similar to CoreCivic confidential information, as we often are under legal or contractual obligations to protect it.

For more information, see the [Serving Our Government Partners](#) (page 22) and [Dealing Fairly with Third Parties](#) (page 32) sections of this Code and **CoreCivic Policy 1-7: CoreCivic Proprietary Information**.

The guidance in this section of the Code is not intended to prevent you from taking actions that are protected by other laws, such as (1) complying with a court order, (2) reporting fraud, waste or abuse directly to a government agency or (3) engaging in protected activity under applicable labor laws.

USING COMPANY ASSETS AND SYSTEMS RESPONSIBLY

We are careful and responsible in our use of CoreCivic property and information and communications systems. It is our duty to keep them safe from loss, damage, theft or misuse.

Assets

CoreCivic's assets include everything we own, lease or are entitled to use. This includes equipment, systems, records, buildings, real estate, vehicles, plans and intellectual property. You must use these assets only for legitimate business purposes, except when policy allows limited personal use.

Information and Communications Systems

CoreCivic's information technology (IT) systems should be used solely for business purposes, except to the extent policy allows for incidental personal use. Follow IT Department procedures for using and protecting IT systems and company information.

Remember, any information you send, receive, communicate or store using CoreCivic IT systems is no longer private. This includes phone, text and e-mail messages. It also includes data used in social media, mobile apps or file-sharing devices. For safety and security reasons, CoreCivic has the right to review, save and/or destroy all content stored or transmitted on CoreCivic's IT systems.

For more information, see **CoreCivic Policy 1-8: Use of Communication Devices, Computers and the Internet** or local facility policy.

EXAMPLES OF INAPPROPRIATE USE OF IT SYSTEMS

- Use of non-business-related websites that interferes with your work
- Communicating patently offensive, discriminatory or illegal material by phone, e-mail or any other company-provided device or system
- Sharing individual login credentials with others
- Storing company proprietary or confidential information on personal devices or accounts
- Transmitting personally identifiable employee information (such as Social Security numbers) to a recipient who does not have a legitimate business need for the information

INTEGRITY INTO ACTION: CYBERSECURITY

- Q.** I received a call from someone who said he was from IT asking for my network credentials, including my network ID and password, so that he could complete a required software update. He then sent an e-mail with a link where I could provide my credentials. Is this OK?
- A.** No. No one from or connected with CoreCivic IT will ever ask you to give them your network password. You should never give anyone your network credentials, and you should never open an Internet link unless you know the source. You should contact the IT help desk directly to report this issue and seek guidance.



HANDLING EXTERNAL COMMUNICATIONS APPROPRIATELY

Only certain employees are authorized to speak on behalf of CoreCivic. We direct inquiries to the right people to ensure CoreCivic provides accurate information to the public, the government and other third parties.

Only designated employees are authorized to make public or other external communications on behalf of CoreCivic. Do not speak on behalf of CoreCivic in any forum unless you are authorized to do so. The sections below provide guidance on common types of external communications.

Media Communications (Including Social Media)

CoreCivic routinely responds to media requests and communicates information to the public on a wide range of topics. To ensure consistency and accuracy, only those designated by CoreCivic management are authorized to respond to media requests on behalf of CoreCivic or to speak publicly on its behalf.

If you are contacted by the media seeking an official statement from CoreCivic and are not authorized to respond, politely decline any comment or refer them to a designated CoreCivic public information officer.

For more information, see **CoreCivic Policy 1-4: Employee Media Guidelines**.

INTEGRITY INTO ACTION: USING SOCIAL MEDIA RESPONSIBLY

Social media moves quickly and can reach a worldwide audience. Our social media activity can affect our reputation, for better or worse.

Make sure you are familiar with CoreCivic social media guidelines, and always think before you post. Avoid:

- Posts that appear to be made on behalf of CoreCivic.
- Having social media contact with residents.
- Sharing confidential or proprietary information about our customers, contracts, employees or residents.



Other External Communications

Requests from Government Agencies: CoreCivic desires to cooperate fully with inquiries, audits and other requests for information from government partners and agencies with oversight authority. CoreCivic also desires responses to be relevant, accurate, complete and timely. If you are not sure if you are authorized to or should respond to a government request or inquiry that is directed to CoreCivic, ask a supervisor or refer the request to someone you know is authorized to respond. For more information, see the [Serving Our Government Partners](#) section of the Code on page 22 and **CoreCivic Policy 1-10: Response to Agency Requests**.

Political and Lobbying Communications: To ensure compliance with applicable law and company policy, only designated employees are permitted to engage in lobbying on behalf of the company. For more information, see the [Corporate Political Activity](#) section on page 27.

CODE OF ETHICS – SHORT FORM

We Help Each Other Do the Right Thing.

We help each other make good, values-based decisions. When we all live by our Values, we support our mission and make our company stronger.

Taking Responsibility for Our Ethical Culture

We are all responsible for upholding our Values and reputation. Our Values guide our decisions and behavior, and we support each other in doing the right thing.

Speaking Up and Seeking Help

Speaking up makes it possible for us to address issues. We do not retaliate against each other or allow others to be retaliated against for speaking up.

We Meet Our Obligations with Honest Business Practices.

We conduct our business with honesty and in good faith because it is the right thing to do. As a provider of government services, we must always operate in compliance with our commitments and show ourselves to be responsible and trustworthy.

Serving Our Government Partners

We serve our partners in government with integrity, honesty and dedication. As a responsible partner, we meet our contractual obligations, comply with the specialized rules that apply to government business and strive to avoid even the appearance of improper conduct.

Promoting Investor Trust

We keep reliable records and maintain appropriate internal financial controls in order to make timely, full and accurate public disclosures and reports to the Securities and Exchange Commission. We do not take advantage of inside information for personal financial gain.

Dealing Fairly with Third Parties

Our customers and communities benefit from free and fair competition. We are committed to conducting business in good faith and dealing fairly with our business partners.

We Keep Our Facilities and Communities Safe.

We ensure safety and security to protect everyone who uses our properties and facilities, as well as the communities we serve.

Keeping Workplaces Safe

We keep our workplaces safe to protect everyone who lives, works or volunteers in or who visits our facilities. When we work in a safe environment, we can focus on doing our best for each other and those in our custody.

Safeguarding Those in Our Care

Those in our care have been entrusted to us by our government partners. It is our duty to keep them safe and secure. We are trusted to prevent mistreatment of any resident or visitor, whether by staff or other residents.

Respecting Our Communities

We protect the people in the communities we serve by keeping facilities safe and helping residents improve. We also protect our property and our communities by protecting the environment – conserving resources and avoiding environmental harm are smart business and are the right thing to do.

We Support a Culture of Respect and Inclusion.

We support a culture of respect and inclusion because everyone has the right to be respected and treated fairly. By embracing a wide range of experiences and backgrounds, we learn from each other and expand our abilities.

Fostering a Respectful Environment

We treat each other with dignity. We keep our work environment free of prohibited harassment and discrimination. We recognize our obligations to employees and work to fulfill them. When we do so, we create an attractive workplace where we can better serve those who rely on us.

Promoting Equal Opportunity

We are an equal opportunity employer and strive to create a workforce that reflects many different backgrounds and experiences. The diversity of our workforce makes us stronger and better at what we do and helps us attract, retain and develop the best employees.

Respecting Human Rights

We treat all those in our care with dignity and respect. It is our duty to make sure their legal and human rights are respected and protected. Our respect for these rights helps us to ensure safety and to further our goals of promoting reentry and reducing recidivism.

We Protect the Assets and Interests of Our Organization.

We protect CoreCivic assets and interests to protect our people, our property, our stockholders, our ability to compete effectively and our reputation.

Avoiding Conflicts of Interest

We make business decisions based on what is best for CoreCivic and those we serve, not personal reasons. Making smart decisions for the right reasons is essential to our success and reputation.

Protecting Confidential Information

We protect confidential information whether it belongs to CoreCivic, one of CoreCivic's partners, a resident or an employee.

Using Company Assets and Systems Responsibly

We are careful and responsible in our use of CoreCivic property and information and communications systems. It is our duty to keep them safe from loss, damage, theft or misuse.

Handling External Communications Appropriately

Only certain employees are authorized to speak on behalf of CoreCivic. We direct inquiries to the right people to ensure CoreCivic provides accurate information to the public, the government and other third parties.

CORECIVIC HUMAN RIGHTS POLICY STATEMENT

At CoreCivic, we recognize the inherent dignity of the human person and the need to treat every individual with respect. As we have since our inception, we share the responsibility of our government partners when they entrust individuals to our care.

We have adopted this policy statement to make clear our commitment to respecting human rights, and to communicate that commitment to our stakeholders and others who may be interested in our business and operations.

RESIDENT RIGHTS AND TREATMENT

A strong commitment to resident rights and proper treatment is essential to our work, encompassing the following key areas:

Legal Rights

We maintain and work to uphold comprehensive policies protecting residents' legal rights. These rights include the following:

- Freedom from harassment and discrimination
- Freedom from verbal abuse, personal injury, disease, property damage and harassment
- Access to counsel and access to courts
- Communication with the media
- Access to grievance processes
- Freedom of religion
- Equal access to programs, work assignments and administrative decisions
- For foreign national (non-U.S. citizen) detainees, access to the foreign consulate from his/her country of citizenship

CoreCivic policy also includes protections for freedom of expression and identity, including freedom from discrimination or harassment based on race, religion, national origin, sex, gender, sexual orientation, disability or political views and freedom in personal grooming (subject to requirements relating to safety, security, identification and hygiene).

Safety and Security

Safety and security is our top priority, and we endeavor to provide a high level of protection to those in our care. No person should ever be subjected to any cruel, inhumane or degrading treatment or punishment. To that end, CoreCivic policy provides for the following:

- Freedom from personal abuse and corporal punishment
- A strict prohibition on the use of any type of force for punishment or reprisal, or which is unnecessary or excessive
- Zero tolerance of sexual abuse or harassment
- Strong suicide prevention training and risk reductions procedures
- A prohibition on any inmate or detainee having authority or control over another

Health Care, Including Mental Health Care

We are committed to access for all residents to consistent, high-quality health care, including mental health care. All CoreCivic correctional and detention facilities include health services clinics managed by CoreCivic or a third party contracted directly by one of our government partners that provide access to physical and mental health care services at levels consistent with accreditation and practice standards in correctional health care. Health care services are provided by credentialed and licensed professionals who perform services to standards of care comparable to those applicable in the wider community. In locations where we do not operate the on-site health services clinic, we recognize a responsibility to facilitate access to care.

Rehabilitation and Reentry Programs

We believe we have an opportunity and a responsibility to help residents develop the skills and values needed to succeed when they leave our facilities. We have always been committed to high standards in rehabilitation and reentry programming and to providing access to quality programs to those who desire the chance for personal growth. We maintain a dedicated department within the company devoted to identifying best practices and developing and implementing creative programs that are appropriate to the type of facility, the resident population as a whole and the needs of individual residents and the requirements of our government partners. The types of programs we offer include the following:

- Academic education
- Vocational training
- Addictions treatment
- Life skills training
- Faith-based programming
- Preparation for reentry and pre-release

Visitation and Outside Contact

We understand that having the support of family and friends is a critical part of ensuring well-being and the potential for successful reentry. Individuals at CoreCivic facilities have the right to communicate with the outside world on a regular basis through written and verbal correspondence and through visitation, all subject to reasonable restrictions.

Standards of Living

Our facilities and operations are designed to ensure an appropriate standard of living for everyone in our care. This includes food, drinking water, accommodation, clothing and bedding, as well as air, floor space, lighting, heating and ventilation necessary to maintain safe, humane conditions.

EMPLOYEE RIGHTS

Our facilities are staffed by dedicated corrections professionals, including correctional officers, chaplains, teachers, nurses and counselors. We promote equal opportunity for our employees without regard to race, color, sex, national origin, religion, age, disability, sexual orientation, gender identity/expression or any other status or characteristic protected by applicable federal, state or local law in recruiting, hiring, and all other terms and conditions of employment. We work to prevent harassment due to race, color, religion, sex, national origin, age, disability, sexual orientation or gender identity/expression and from retaliation. We endeavor to respect and promote diversity in our ranks. We recognize employee freedom of association and we support the right of employees to decide freely if they want to be represented by a labor union.

Risk Assessment and Monitoring

Our operations are subject to a robust mix of internal and external risk assessment and monitoring that bear directly on our key industry-specific human rights obligations, including:

- Annual, unannounced operational and compliance audits by our Quality Assurance unit, which is independent of CoreCivic operations management.
- Audit and accreditation by the independent American Correctional Association (ACA) for the vast majority of our facilities.
- Direct oversight by our government partners, including, in almost all instances, an on-site contract monitor or monitors.

We maintain grievance processes for residents and employees, as well as toll-free hotlines for employees, friends and relatives of residents and other interested parties. We also have in place incident reporting and after action review procedures for significant incidents that occur in CoreCivic facilities. We observe non-retaliation and confidentiality policies to encourage reporting and effective investigation.

We view these processes as opportunities for continuous improvement, and we regularly make enhancements intended to make us a better partner, employer and operator.

Communication to Employees and Third Parties

We expect all of our employees, as well as third parties working in CoreCivic facilities and others with whom we are affiliated, to conduct themselves in a manner consistent with this policy statement. We will publish this statement on the CoreCivic public website and communicate it to our employees, those we do business with and other stakeholders, including our resident population.

CONTINUOUS ADAPTATION AND ENGAGEMENT WITH HUMAN RIGHTS STAKEHOLDERS

Our approach to human rights is informed by accepted standards for domestic and international human rights and corrections and detention services, including the following:

- United States constitutional law,
- American Correctional Association standards,
- National Health Commission on Correctional Health Care standards,
- Contractual requirements of our government partners, and
- The United Nations' Universal Declaration of Human Rights, Standard Minimum Rules for the Treatment of Prisoners and Basic Principles for the Treatment of Prisoners.

Recognizing that the commitment expressed in this policy statement is part of an ongoing process, we will review our training, communication and reporting practices to consider enhancements and we will continue to engage with stakeholders on human rights issues.

FACILITY STANDARDS OF CONDUCT

As a CoreCivic or subsidiary employee, you are expected to conduct yourself in a diligent and professional manner at all times. You should be guided by our CoreCivic Values; the safety, security and integrity of your facility; and the rights and well-being of the residents entrusted to our care. Although your specific facility standards may differ, these are general guidelines every facility employee is expected to follow.

Personal Conduct

1. Be familiar with and follow the CoreCivic Code of Ethics.
2. Be professional and diligent.
3. Be supportive of colleagues.
4. Be courteous to visitors.
5. Follow facility safety and security policies and procedures.
6. Do not introduce or traffic in contraband of any kind.
7. Cooperate with authorized audits and investigations.
8. Complete official documents promptly and honestly.
9. Use your CoreCivic credentials only for legitimate purposes.

Those in Our Care

10. Treat those in our care with dignity. Respect their rights and support access to programs, health care and grievance procedures.
11. Maintain appropriate boundaries. Avoid any appearance of a conflict of interest: outside contacts (including social media), romantic or sexual relationships, financial transactions, favoritism, undue fraternization and exchanging of gifts.
12. Use physical interventions only when appropriate and permitted by policy.
13. Do not engage in abusive behavior toward a resident's person or property.

Reporting

14. Promptly report the following matters to facility management:
 - Employment by or service in an ownership or leadership capacity with a non-CoreCivic entity
 - Any personal (non-CoreCivic) contact or relationship with a current or past resident, or a family member or associate of a resident
 - Any personal arrest, indictment or conviction of an offense other than a routine traffic violation
15. Report misconduct. Speaking up is a basic part of professionalism, and CoreCivic provides many resources for reporting, including your supervisor, facility management, and Ethics and Compliance. Some examples of situations you should report include:
 - Discoveries of contraband
 - Reports or allegations of sexual harassment or assault
 - Reports or allegations of retaliation
 - Resident medical emergencies

There are detailed policies that support the items listed above. For more information, please refer to the CoreCivic Code of Ethics and the policies, procedures and post orders that apply at your facility.

POLICY REFERENCE GUIDE

Introduction

CoreCivic Policy 3-3: Code of Ethics

We help each other do the right thing.

CoreCivic Policies 3-6-01 and 3-6-02: CoreCivic Peer Review Procedures

We meet our obligations with honest business practices.

CoreCivic Policy 3-34: Restrictions on Employment Discussions with Current Government Employees and Responsibilities of Former Government Employees

CoreCivic Policy 1-15: Retention of Records

CoreCivic Policy 1-10: Response to Agency Requests

CoreCivic Policy 1-9: Gifts to Government Officials

CoreCivic Policy 3-28: Government Relations

CoreCivic Policy 3-21: Insider Trading

We keep our facilities and communities safe.

CoreCivic Policy 8-2: Facility Safety Authority/Team Safety Program

CoreCivic Policy 8-13: Workplace Violence

CoreCivic Policy Chapter 8: Safety/Emergency Procedures

CoreCivic Policy Chapter 9: Security/Control

CoreCivic Policy 3-15: Drug and Alcohol Program

CoreCivic Policy 14-2: Sexual Abuse Prevention and Response

CoreCivic Safety Policy 9-19: Suicide Prevention/Risk Reduction

CoreCivic Safety Policy 9-1: Use of Force and Restraints

CoreCivic Policy Chapter 13: Medical/Health Care Services

CoreCivic Policy Chapter 7: Physical Plant

CoreCivic Policy 8-4: Hazardous Materials Shipping

CoreCivic Policy 8-5: Control of Hazardous Chemicals – Materials

We support a culture of respect and inclusion.

- CoreCivic Policy 3-17: Harassment – Sexual Harassment
- CoreCivic Policy 1-5: Equal Employment Opportunity
- CoreCivic Policy 3-7: Exempt/Non-Exempt Compensation
- CoreCivic Policy 3-35: Diversity and Inclusion
- CoreCivic Policy 3-2: Reasonable Accommodation
- CoreCivic Policy Chapter 14: Resident Rights

We protect the assets and interests of our organization.

- CoreCivic Policy 3-30: Personal Relationships
- CoreCivic Policy 3-27: Business Gifts
- CoreCivic Policy 3-09: Employee Records
- CoreCivic Policy 13-58: Medical Records
- CoreCivic Policy 3-23: Employee Health
- CoreCivic Policy 13-74: Privacy of Protected Health Information
- CoreCivic Policy 1-7: CoreCivic Proprietary Information
- CoreCivic Policy 1-8: Use of Communication Devices, Computers and the Internet
- CoreCivic Policy 1-4: Employee Media Guidelines
- CoreCivic Policy 1-10: Response to Agency Requests



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