



Human Rights Risk Assessment Summary

2019 ESG REPORT

Environmental • Social • Governance



Human Rights | Management Approach and Programming

At CoreCivic, we recognize the inherent dignity of every human being and the enormous good that flows from a culture of individual respect. We recognize that risk to human rights is inherent in the work we do. Accordingly, respect for human rights is fundamental to our mission and a core component of the ethical framework that governs our operations.

Our commitment to human rights is embodied in the CoreCivic Human Rights Policy Statement adopted by our board of directors in 2013, which is integrated into our [Code of Ethics](#). Implementation of the Human Rights Policy is led by CoreCivic’s chief ethics and compliance officer, with oversight from the company’s Ethics and Compliance Committee and the Risk Committee of the board of directors.

We strive to ensure that everyday behaviors and operational decisions by our employees are consistent with our stated commitment to human rights. We train 100 percent of our security personnel on key industry-specific human rights obligations before they start work for us (pre-service training) and annually. Other examples of how we implement our commitment to human rights for residents entrusted to our care include the following:

- Detailed policies and procedures that protect resident legal rights and promote respect for salient resident human rights.
- Grievance processes for residents and complaint mechanisms for friends and family members.
- Audit and monitoring processes to assess performance against key industry-specific human rights obligations and investigation resources for their allegations of violations.
- Regular engagement with external stakeholders on human rights and criminal justice reform issues.

For employees, we work to prevent harassment of any kind and promote diversity. To further these goals, we:

- Maintain policies on equal employment opportunity, sexual harassment and harassment based on race, sex, and other protected characteristics, and accommodation for persons with disabilities.
- Train our employees on these policies before they start work for us and annually.
- Maintain discipline, grievance, reporting and investigative resources to enforce employee rights and receive and address employee concerns.
- Prohibit retaliation or reprisal for use or participation in the informal resolution process or grievance process.

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. Approximately 1,330 employees (9.4%) at six of our facilities are represented by labor unions.

We are committed to continued improvement and ongoing evaluation of our approach to human rights. This commitment is exemplified by our recent accomplishments, including the human rights risk assessment we conducted in 2019. Details about the risk assessment and our future plans are included here in this report.

Human-rights related allegations

We acknowledge certain human-rights related allegations concerning our facility operations. Public statements on the company’s positions on certain matters or allegations can be found on the “Newsroom” section of our [website](#). In addition to this section on Human Rights, we also encourage you to review the other sections of this report to understand our commitment to safe and secure operations, provision of quality health services and business integrity.

Recent Accomplishments

Governance

- ✓ Completed industry-first human rights risk assessment
- ✓ Human rights-focused cultural goal incorporated into CoreCivic strategic plan
- ✓ Human rights-related goals expanded in executive compensation plan
- ✓ Human rights experience / expertise added to board of directors nomination criteria

Defining the Focus of Reporting

- ✓ Published industry-first ESG report, including section on human rights

Management of Salient Human Rights Issues

- ✓ Human rights topics featured at 2020 Facility Leaders Conference
- ✓ Human rights training targets established for 2020
- ✓ Human rights focus in enterprise-wide Code of Ethics training for 2020
- ✓ Human rights-related items expanded in quality assurance climate survey tool
- ✓ Ongoing stakeholder engagement through multiple channels

“Productive dialogues with CoreCivic continue to this day, with CoreCivic assessing its policies, practices, and standards against UN Guiding Principles.”

Mary Baudoin, Interfaith Center on Corporate Responsibility (ICCR) affiliated shareholder representative (Jesuits of the US Central and Southern Province). (March 17, 2020)



Human Rights | Risk Assessment Methodology

CoreCivic performed its human rights risk assessment using the UNGP Framework and according to the methodology summarized and illustrated below.



Source: UN Guiding Principles Reporting Framework

“We are pleased to play a leading role in our industry by completing a rigorous human rights risk assessment under the UN Guiding Principles Framework. Working closely with an external expert on human rights, we were able to identify areas of progress and alignment and, more importantly, areas for attention and improvement as we seek to ensure that our culture is aligned at all levels with our stated commitment to human dignity and respect for all. We are working on implementing the assessment’s key takeaways now, and will continue to examine ways to strengthen our commitment to human rights in the future.”

Scott Craddock, vice president and chief ethics and compliance officer, CoreCivic





Human Rights | **Salient Rights Identification**

Our risk assessment methodology reviewed the following sources to identify relevant human rights to residents and our employees, with a full listing and description of rights to follow:

Sources Reviewed to Compile Salient Human Rights for Consideration

- The Universal Declaration of Human Rights (UDHR)
- The International Covenant on Civil & Political Rights (ICCPR)
- The International Convention on Economic, Social and Cultural Rights (ICESCR)
- The International Labour Organisation Declaration on Fundamental Rights at Work (ILO)
- Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)
- United Nations Standard Minimum Rules for the Treatment of Prisoners (UNSMR)
- UNHCR Detention Guidelines (UNHCR)
- Convention on the Rights of the Child (CRC)
- Convention on the Rights of Persons with Disabilities (CRPD)

Rights Category	Human Rights	Description
Civil / Political	Right to equality and freedom from discrimination	All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood. Everyone is entitled to all the rights and freedoms set forth in this Declaration, without distinction of any kind, such as race, color, sex, language, religion, political or other opinion, national or social origin, property, birth or other status.
Civil / Political	Right to freedom of belief and religion	Everyone has the right to freedom of thought, conscience and religion; this right includes freedom to change his religion or belief, and freedom, either alone or in community with others and in public or private, to manifest his religion or belief in teaching, practice, worship and observance.
Civil / Political	Right to participate in government and in free elections	Everyone has the right to take part in the government of his country, directly or through freely chosen representatives. Everyone has the right to equal access to public service in his country. The will of the people shall be the basis of the authority of government; this will shall be expressed in periodic and genuine elections which shall be by universal and equal suffrage and shall be held by secret vote or by equivalent free voting procedures.
Civil / Political	Right to a fair and public hearing by an independent and competent tribunal	Everyone is entitled in full equality to a fair and public hearing by an independent and impartial tribunal, in the determination of his rights and obligations and of any criminal charge against him. Everyone has the right to an effective remedy by the competent national tribunals for acts violating the fundamental rights granted him by the constitution or by law.
Civil / Political	Right to be considered innocent until proven guilty	Everyone charged with a penal offence has the right to be presumed innocent until proved guilty according to law in a public trial at which he has had all the guarantees necessary for his defense. No one shall be held guilty of any penal offence on account of any act or omission which did not constitute a penal offence, under national or international law, at the time when it was committed. Nor shall a heavier penalty be imposed than the one that was applicable at the time the penal offence was committed.
Civil / Political	Right to freedom of opinion and expression	Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers.
Civil / Political	Right to equality before the law	All are equal before the law and are entitled without any discrimination to equal protection of the law. All are entitled to equal protection against any discrimination in violation of this Declaration and against any incitement to such discrimination.
Civil / Political	Right to marriage and family	Men and women of full age, without any limitation due to race, nationality or religion, have the right to marry and to found a family. They are entitled to equal rights as to marriage, during marriage and at its dissolution. Marriage shall be entered into only with the free and full consent of the intending spouses. The family is the natural and fundamental group unit of society and is entitled to protection by society and the State.
Civil / Political	Right to freedom from interference with privacy, family, home and correspondence	No one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honor and reputation. Everyone has the right to the protection of the law against such interference or attacks.
Civil / Political	Right to access to health care services	Prisoners should enjoy the same standards of health care that are available in the community, and should have access to necessary health care services free of charge without discrimination on the grounds of their legal status. Women are entitled to access, on a basis of equality of men and women, health care services including family planning.
Civil / Political	Right to protection for the child	The best interests of children must be the primary concern in making decisions that may affect them. All adults should do what is best for children. When adults make decisions, they should think about how their decisions will affect children. This particularly applies to budget, policy and law makers.



Rights Category	Human Rights	Description
Civil / Political	Right of persons with disabilities (physical and/or mental)	Ensure and promote the full realization of all human rights and fundamental freedoms for all persons with disabilities without discrimination of any kind on the basis of disability (physical and/or mental).
Civil / Political	Right to adequate standard of living	Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control. Motherhood and childhood are entitled to special care and assistance. All children, whether born in or out of wedlock, shall enjoy the same social protection.
Civil / Political	Right of peaceful assembly and association	Everyone has the right to freedom of peaceful assembly and association. No one may be compelled to belong to an association.
Civil / Political	Right to self-determination	Imprisonment and other measures that result in cutting off persons from the outside world are afflictive by the very fact of taking from these persons the right of self-determination by depriving them of their liberty. Therefore the prison system shall not, except as incidental to justifiable separation or the maintenance of discipline, aggravate the suffering inherent in such a situation.
Civil / Political	Right to contact with the outside world	Prisoners shall be allowed, under necessary supervision, to communicate with their family and friends at regular intervals. Both by corresponding in writing and using, where available, telecommunication, electronic, digital and other means and by receiving visits.
Economic / Social / Cultural	Right to protect Indigenous Peoples' cultural values and practices	Right to recognition and protection of social, cultural and spiritual values and practices.
Economic / Social / Cultural	Right to participate in the cultural life of the community	Everyone has the right freely to participate in the cultural life of the community, to enjoy the arts and to share in scientific advancement and its benefits. Everyone has the right to the protection of the moral and material interests resulting from any scientific, literary or artistic production of which he is the author.
Economic / Social / Cultural	Right to social security	Everyone, as a member of society, has the right to social security and is entitled to realization, through national effort and international co-operation and in accordance with the organization and resources of each State, of the economic, social and cultural rights indispensable for his dignity and the free development of his personality.
Economic / Social / Cultural	Right to education	Everyone has the right to education. Education shall be free, at least in the elementary and fundamental stages. Elementary education shall be compulsory. Technical and professional education shall be made generally available and higher education shall be equally accessible to all on the basis of merit. Education shall be directed to the full development of the human personality and to the strengthening of respect for human rights and fundamental freedoms. It shall promote understanding, tolerance and friendship among all nations, racial or religious groups, and shall further the activities of the United Nations for the maintenance of peace. Parents have a prior right to choose the kind of education that shall be given to their children.
Labor	Right to desirable work and to join trade unions.	Everyone has the right to work, to free choice of employment, to just and favorable conditions of work and to protection against unemployment. Everyone, without any discrimination, has the right to equal pay for equal work. Everyone who works has the right to just and favorable remuneration ensuring for himself and his family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection. Everyone has the right to form and to join trade unions for the protection of his interests.
Labor	Right to rest and leisure	Right to a family life and rest and leisure, including reasonable limitation of working hours, periodic holidays with pay and remuneration for public holidays.
Labor	Right to be free from slavery	No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms.
Property	Right to own property	Everyone has the right to own property alone as well as in association with others. No one shall be arbitrarily deprived of his property.
Property	Right to access personal records	Every prisoner shall be granted access to the confidential records pertaining to him or her, subject to redactions authorized under domestic legislation, and shall be entitled to receive an official copy of such records upon his or her release.
Security	Right to life, liberty, and personal security	Everyone has the right to life, liberty and security of person.
Security	Right to be free from torture and degrading treatment	No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.
Security	Right to be free from arbitrary arrest, detention and exile	No one shall be subjected to arbitrary arrest, detention or exile. [...] Any detention or deprivation of liberty must be in accordance with and authorised by national law. [...] Detention must not be arbitrary, and any decision to detain must be based on an assessment of the individual's particular circumstances. [...] Detention must not be discriminatory.
Security	Right to separation	The different categories of prisoners shall be kept in separate institutions or parts of institutions, taking account of their sex, age, criminal record, the legal reason for their detention and the necessities of their treatment.
Asylum	Right to seek asylum in other countries from prosecution	Everyone has the right to seek and to enjoy in other countries asylum from persecution. This right may not be invoked in the case of prosecutions genuinely arising from non-political crimes or from acts contrary to the purposes and principles of the United Nations.
Asylum	Right to humane and dignified conditions of detention	Conditions of detention must be humane and dignified. [...] If detained, asylum-seekers should be treated with dignity and in accordance with international standards. Detention of asylum-seekers for immigration-related reasons should not be punitive in nature. The use of prisons, jails, and facilities designed or operated as prisons or jails, should be avoided. If asylum-seekers are held in such facilities, they should be separated from the general prison population. Criminal standards (such as wearing prisoner uniforms or shackling) are not appropriate. [and more]
Asylum	Right to special attention for victims of trauma and torture, victims of trafficking	Where particular asylum-seekers present with psychological illness, trauma, depression, anxiety, aggression, and other physical, psychological and emotional consequences, such factors need to be weighed in the assessment of the necessity to detain. Victims of torture and other serious physical, psychological or sexual violence also need special attention and should generally not be detained.



Human Rights | **Salient Rights and Risk Analysis**

Our risk assessment methodology reviewed international human rights instruments to identify human rights relevant to residents and our employees. The sources we reviewed included universal instruments such as the Universal Declaration of Human Rights and International Covenant on Civil and Political Rights, as well as those directly applicable to detention settings, including the United Nations Standard Minimum Rules for the Treatment of Prisoners and the UNHCR Detention Guidelines.

Risk Assessment and Ranking for Salient Risks

Our methodology identified 32 distinct human rights relevant to our resident population and 22 rights relevant to our employees. For each right, we identified “flashpoints,” or specific risks of negative impacts due to CoreCivic operations or actions. For example:

Right: Equality and Freedom from Discrimination		Right: Freedom from Torture or Degrading Treatment	
Resident Flashpoint	Unequal access to services or programs	Resident Flashpoint	Unnecessary or excessive use of force or restraints
Employee Flashpoint	Unequal treatment in recruitment or compensation	Employee Flashpoint	Harassment based on race, gender or other protected status

We reviewed each right, through the lens of the specific identified flashpoints and from the perspective of the rights holders, to determine its salience, or importance to our operations. Risk ratings were comprised of the following factors: scale, reach, probability, remediability, and attribution to CoreCivic.

After assigning scores for final salience classifications we cross-referenced our existing policies, procedures and activities to determine whether they adequately address identified human rights. The example on the right illustrates a review for the salient human right of equality and freedom from discrimination.





Human Rights | Risk Ratings

		Salience - Inmates/Residents			Salience - Employees		
		Moderate	High	Very High	Moderate	High	Very High
Human Rights Categories	Civil/ Political	<ul style="list-style-type: none"> Right to freedom of belief and religion Right to freedom of opinion and expression Right to equality before the law Right to freedom from interference with privacy, family, home and correspondence Right to a fair and public hearing by an independent and competent tribunal 	<ul style="list-style-type: none"> Right of person with disabilities (physical and/or mental) Right to an adequate standard of living Right to contact with the outside world Right to protection for the child 	<ul style="list-style-type: none"> Right to access health care services Right to equality and freedom from discrimination 	<ul style="list-style-type: none"> Right to be considered innocent until proven guilty Right to freedom of opinion and expression Right to equality before the law Right to a fair and public hearing by an independent and competent tribunal 	<ul style="list-style-type: none"> Right to equality and freedom from discrimination Right to an adequate standard of living 	<ul style="list-style-type: none"> Right to freedom from interference with privacy, family, home and correspondence Right of person with disabilities (physical and/or mental)
	Economic/ Social/ Cultural	<ul style="list-style-type: none"> Right to protect indigenous peoples' cultural values and practices Right to participate in the cultural life of the community 			<ul style="list-style-type: none"> Right to social security Right to education 		
	Labor	<ul style="list-style-type: none"> Right to desirable work and to join trade unions Right to be free from slavery 					<ul style="list-style-type: none"> Right to rest and leisure
	Property	<ul style="list-style-type: none"> Right to own property Right to access personal records 					
	Security	<ul style="list-style-type: none"> Right to separation 		<ul style="list-style-type: none"> Right to life, liberty and personal security Right to be free from torture and degrading treatment Right to humane and dignified conditions of detention 			<ul style="list-style-type: none"> Right to life, liberty and personal security Right to be free from torture and degrading treatment
	Asylum	<ul style="list-style-type: none"> Right to seek asylum from prosecution in other countries Right to special attention for victims of trauma and torture, victims of trafficking 				<p>Rights considered, but not assessed as Moderate or above:</p> <ul style="list-style-type: none"> Right to participate in government and in free elections Right to peaceful assembly and association Right to self-determination Right to marriage and family Right to be free from arbitrary arrest, detention and exile 	



Human Rights | Recommendations

The risk assessment evaluated CoreCivic's management of its human rights impacts under the UNGP Reporting Framework. This allowed us to identify opportunities to improve the protection and promotion of human rights in CoreCivic's operations and provide a framework for reporting on our progress. The below table outlines key recommended actions and highlights our plans to address those recommendations.

UNGP Reporting Framework	Selected Recommended Actions	CoreCivic 2020 Implementation Plan Highlights
Part A: Governance of Respect for Human Rights		
A1: Policy Commitment	<ul style="list-style-type: none"> Update Human Rights Policy to align more closely with the results of the human rights assessment and other initiatives implemented since the policy was adopted in 2013 Proactively seek feedback from internal and external stakeholders Communicate updated policy to all relevant stakeholders to enhance understanding of CoreCivic's position regarding human rights 	<ul style="list-style-type: none"> Update human rights policy Designate cross-functional steering committee for ongoing implementation Communicate updated policy via coordinated communications plan to all relevant stakeholders
A2: Embedding Respect for Human Rights	<ul style="list-style-type: none"> Continue to support senior management and the board of directors in "connecting the dots" between operational issues and potential human rights violations Continue further facility-level evaluation of how human rights risks are managed 	<ul style="list-style-type: none"> Deliver board and executive human rights training Amend governance guidelines to include human rights experience/expertise among attributes considered for director nominees Continue risk assessment at facility level
Part B: Defining the Focus of Reporting		
B1: Statement of Salient Issues	<ul style="list-style-type: none"> Expand scope of assessment from corporate and facility-level to include assessment of risks in supply chain to ensure salient issues are considered across the value chain 	<ul style="list-style-type: none"> Continue risk assessment at vendor/supply chain level Publish targeted human rights report as a component of this 2019 ESG report
B2: Choice of Focal Geographies		
B3: Additional Severe Impacts		
Part C: Management of Salient Human Rights Issues		
C1: Specific Policies	<ul style="list-style-type: none"> Incorporate human rights context and policy content into existing functional training programs, including concrete steps and actions expected from different functions, with practical case studies to build facility-level understanding and capacity to lead implementation of human rights policy Integrate the Human Rights Policy Statement and results of assessment into corporate audit protocols Consider how to explicitly incorporate the policy or human rights awareness into the cultural surveys already being conducted Continue current stakeholder engagement activities, including government partners 	<ul style="list-style-type: none"> Meet training targets established by board <ul style="list-style-type: none"> Human rights training for 90%+ of continuing employees Incorporate human rights element in all core training programs Incorporate human rights element in all training programs related to salient human rights Complete policy and audit tool cross-reference to salient human rights Include human rights items in new enterprise-wide cultural survey Continue ongoing stakeholder engagement through multiple channels
C2: Stakeholder Engagement		
C3: Assessing Impacts		
C4: Integrating Findings and Taking Action		
C5: Tracking Performance		
C6: Remediation		