



HUMAN RIGHTS POLICY

Background, Approach & Next Steps



Human Rights | Introduction



Damon T. Hininger

President & CEO, CoreCivic

Throughout our history, we have met the needs of our government partners for safe, humane corrections and detention services and supported industry efforts to ensure professionalism among employees and protection of the rights of those in our care.

As stated in our original Human Rights Policy: “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.”

Still, as I said in our [2020 ESG Report](#), “like any enterprise worth its salt, we evolve.” Evolving means listening to and striving to meet the needs of all our stakeholders – community participants, resident family members, advocacy organizations and stockholders.

Our new Human Rights Policy embodies this orientation, which has been a CoreCivic hallmark since its founding: to evolve, to identify and to test our operations and procedures against the highest standards, and to move our operations and the industry toward bettering the public good.

Thank you for your interest in CoreCivic. More importantly, thank you for your interest in our employees and the people in our care.



Scott Craddock

Vice President, Chief Ethics and Compliance Officer

Our new [Human Rights Policy](#) represents an important step in our company's journey to align with U.S. and international human rights standards and norms for business and human rights.

More meaningfully, though, it is part of our ongoing drive to be a better, more ethical organization, to the benefit of our employees, the people in our care, the government partners we serve and the communities, systems and industries in which we operate.

In order to have such an impact, the policy must be a living document, simultaneously serving as a statement of our values and aspirations and as a tool to shape our work, our behavior and our culture. The proof will be not just in what the policy says, but also in how we build on our work and show our progress.

This piece provides an in-depth look at why and how we developed and adopted our new Human Rights Policy. My hope is that it also communicates something about who we are and what we aspire to be: an organization that recognizes the responsibility demanded of our business, which places respect for human dignity – for each other and for those in our care – at its foundation.

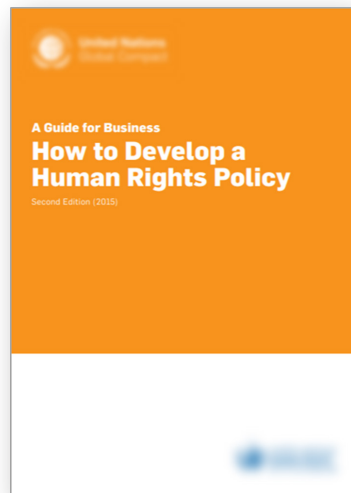




Human Rights | The Essential Elements

In CoreCivic's work to update its Human Rights Policy, international guidance was highly instructive, as corporations and nations have developed best practices that set the standard. Specifically, the UN's *A Guide for Business - How to Develop a Human Rights Policy* helps organizations answer the question - what does a good a

human rights policy do. The list at right summarizes the key features considered during the policy development phase, in line with the UN Global Compact's guidance.



What does a good human rights policy do?

- Shows that a company understands its responsibility to respect human rights and explains the company's commitment to identify, prevent, mitigate and account for its adverse human rights impacts.
- Provides a basis for embedding the responsibility to respect human rights throughout all business functions.
- Increases trust with stakeholders (internal and external) and responds to relevant stakeholder expectations.
- Demonstrates good business practice, building on globally accepted principles.
- Paves the way for ongoing management of human rights risks, including development of in-house learning, management capacity, monitoring and reporting on human rights issues.

Our human rights risk assessment identified several areas where our existing Human Rights Statement could improve. For example, the best practice items below illustrate how and where we integrated these practices into our new policy:

■ **Information on how the company will implement its commitment.**

Sections IV (Policy Governance and Implementation) and V (Human Rights in Practice) satisfy this element.

■ **A summary of those human rights that the business recognizes as likely to be the most salient for its operations and information on how it will account for its actions to meet its responsibility to respect human rights.**

Sections III B (Salient Rights); V G (Monitoring and Reporting); & H (Reporting Misconduct and Non-Retaliation) address this element.

IV. Policy Governance and Implementation

- A. Implementation and Management-level Oversight. The Chief Ethics and Compliance Officer is responsible for day-to-day implementation of this policy, with oversight from our Management Ethics and Compliance Committee.
- B. Board-level Oversight. The Chief Ethics and Compliance Officer will report on at least on an annual basis to the Board or a Board committee to which oversight responsibility has been duly assigned by the Board.
- C. Review and Approval. This policy will be reviewed on an annual basis. Any changes (other than

V. Human Rights in Practice

- This policy will be meaningful only to the extent that our human rights commitments are put into practice on a daily basis by our leaders, our employees, and others who serve or represent us.
- A. Integration with the CoreCivic Code of Ethics.
 1. As stated in the Preamble, respect for human dignity is fundamental to our organizational culture and the ethical operation of our business.
 2. This policy is integrated into the CoreCivic Code of Ethics to ensure promotion of human rights in our ethical culture and the behavioral expectations of all employees and third parties who serve or represent us.
 - B. Responsibility of Employees.
 1. Leadership. Our leaders are responsible for modeling behaviors that exemplify our human rights commitments, making decisions consistent with those commitments, and implementing the policies and procedures supporting our commitments in the day-to-day management of our business and operations.
 2. All employees. Employees are expected to reflect our human rights commitments in their work on a daily basis and to comply with the policies and procedures that support our commitments in our daily operations.
 - C. Policy Promotion and Training.
 1. We will promote this policy, and behaviors and decision-making that support human dignity, through training and other programs and initiatives designed to enhance organizational culture and to

B. Salient Rights.

1. A full list of the salient human rights we have identified in our most recent risk assessment are included in Exhibit A. Exhibit A will be updated based on future risk assessments, as contemplated by Section VE below.
2. For purposes of implementing this policy, we will prioritize rights identified as "high" and "very high" salience.

G. Monitoring and Reporting.

1. Internal Monitoring and Reporting. We have established procedures through which human rights violations may be detected and for reporting violations by employees, third parties, and residents, including, among others –
 - a. Quality assurance auditing and monitoring;
 - b. Employee and resident grievance processes; and
 - c. The Ethics Line.

H. Reporting Misconduct and Non-Retaliation. We encourage the reporting of concerns and misconduct, including with regard to human rights violations, using available resources, including those listed in subsection V.G.1 above, and prohibit retaliation against reporters.

1. Our internal policies prohibit any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavorable treatment connected with raising a concern.
2. For more information on our approach to reporting misconduct and non-retaliation, see the CoreCivic Code of Ethics.



Human Rights | Development and Approval Process

CoreCivic Ethics and Compliance led policy development, with support from a human rights consultant and with input from internal and external stakeholders. An overview of the process is outlined below.



Human Rights Steering Committee						
Ethics & Compliance	Human Resources	Office of the General Counsel	Operations	Quality Assurance	Partner Relations	Strategic Development
*Vice President, Chief Ethics & Compliance Officer	Vice President, Talent, Organizational Development & DEI Managing Director, Enterprise Learning & Development	Associate General Counsel, Labor & Employment Associate General Counsel, Operations	Vice President, Health Services Vice President, Reentry Partnership & Innovation Facility Leaders	Vice President, Quality Assurance	Managing Director, Federal Partnership	Vice President, Strategic Development

*Committee Chair



Human Rights | Human Rights Policy Implementation – Progress & Next Steps

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	2020 Implementation Plan Highlights	2021 Implementation Plan Highlights	2022 Implementation Plans
Part A: Governance of Respect for Human Rights			
A1: Policy Commitment	<ul style="list-style-type: none"> Designated cross-functional steering committee for ongoing implementation 	<ul style="list-style-type: none"> Updated human rights policy with input from steering committee and external stakeholders 	<ul style="list-style-type: none"> Communicate the updated human rights policy via coordinated communications plan to all relevant stakeholders Draft long-term human rights implementation plan
A2: Embedding Respect for Human Rights	<ul style="list-style-type: none"> Delivered board and executive human rights training Amended governance guidelines to include human rights experience among attributes considered for director nominees 	<ul style="list-style-type: none"> Designed process for and conducted two pilot facility-level human rights risk assessments Held workshops with pilot facility leaders to communicate findings and discuss 	<ul style="list-style-type: none"> Complete four facility-level human rights assessments using the model developed and piloted in 2021
Part B: Defining the Focus of Reporting			
B1: Statement of Salient Issues	<ul style="list-style-type: none"> Published targeted human rights report as a component of the 2019 ESG Report 	<ul style="list-style-type: none"> Liaised with departments managing third parties to design additional third-party risk capabilities, including human rights impacts Published Supplier Code of Ethics which includes human rights commitments based on the UN Guiding Principles on Business and Human Rights 	<ul style="list-style-type: none"> Collaborate internally to increase human rights monitoring and due diligence capabilities with respect to third parties Identify key performance indicators (KPIs) for purposes of monitoring and reporting on our performance relative to our human rights policy
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"> Met training targets established by board: <ul style="list-style-type: none"> Human rights training for continuing employees Incorporated human rights element in all core training programs Incorporated human rights element in all training programs related to salient human rights Continued ongoing stakeholder engagement through multiple channels 	<ul style="list-style-type: none"> Met human rights training targets for continuing employees Incorporated accepted standard to assist formalizing stakeholder engagement plan 	<ul style="list-style-type: none"> Identify key performance indicators (KPIs) for purposes of monitoring and reporting on our performance relative to our human rights policy Continue setting training targets for all continuing employees across the enterprise Begin execution on formal external stakeholder engagement plan
C2: Stakeholder Engagement			
C3: Assessing Impacts			
C4: Integrating Findings and Taking Action			
C5: Tracking Performance			
C6: Remediation			