



# CoreCivic Human Rights Policy

## PREAMBLE

By resolution dated December 15, 2021, the Board of Directors (the “Board”) of CoreCivic, Inc. (“CoreCivic”) adopts this Human Rights Policy (this “policy”), which replaces and supersedes the Human Rights Policy Statement adopted by the Board on December 12, 2013, as amended, and affirms and declares the following:

- Respect for human dignity is fundamental to our organizational culture and the ethical operation of our business. It is inherent in our purpose to “Better the Public Good” and it safeguards our ability to fulfill our corporate purpose and mission.
- We will consider human rights impacts in our behavior and decision-making across all our businesses and operations.
- Our commitment to human rights extends to all our stakeholders, including employees, individuals entrusted to our care, government partners, and communities in which we operate. Delivering on our commitment is necessary to the establishment of stakeholder trust and to the generation of long-term shareholder value.
- Limitations already placed upon those in our care as a result of their status as detained or justice-involved persons underscores our responsibility to prioritize respect for human dignity and to advance and uphold the human rights commitments in this policy.
- We will strive to play an industry leadership role in promoting respect for human dignity. We will engage with government partners and third parties who have an interest in our human rights impacts.

This policy articulates our essential human rights commitments and is intended to guide the implementation of these commitments, in policy and practice, throughout the organization. In this policy, the terms “we,” “us,” and “our” refer to CoreCivic and its subsidiaries, unless expressly stated or the context otherwise requires.

## POLICY

### I. Human Rights Commitments

We will endeavor to maintain the following essential human rights commitments at all times across our businesses and operations:

- Promote a culture that prioritizes human dignity -- including respect and compassion towards each other and the individuals entrusted to our care and commitments to diversity, equity, and inclusion -- as a core value to guide both interpersonal interactions and how we do business.
- Reflect our commitment to human dignity in training, policy, and programming solutions, as well as other initiatives designed to influence our corporate culture and provide safe and humane environments.

- Look for opportunities to improve and maintain consistent human rights standards across all our facilities.
- Promote human rights through policy advocacy consistent with our human rights commitments.
- Assess our potential impacts on human rights and our progress in keeping our human rights commitments.
- Engage in constructive stakeholder engagement and report, internally and externally, on our progress in keeping these commitments.
- Seek to prevent and detect potential human rights violations and responsibly address substantiated violations through appropriate remedial actions.

## II. Policy Rationale, Scope, and Integration

### A. Rationale.

1. Industry-Specific Risk. Our Safety and Community business segments are subject to human rights risks specific to our industry based on its role in the U.S. criminal justice and immigration detention systems, with potentially significant impacts on employees and residents in CoreCivic facilities.
2. General Corporate Risk. In addition, we are subject to human rights risks that are typical to any modern business corporation of significant size in terms of employees and supply chain.

### B. Scope and Application.

1. Scope. This policy applies to CoreCivic, Inc., and its subsidiaries and affiliated entities.
2. Application to Third Parties. This policy will be extended to third parties, such as our vendors, suppliers, and consultants, as appropriate, based on our assessment of human rights risk posed by such third parties.

### C. Scope of Protection. This policy is intended to promote respect for the dignity and protection of human rights of the following groups of persons –

1. Detainees and inmates in CoreCivic facilities as well as other justice-involved persons who receive or are subject to services (e.g., remote monitoring) provided by us (collectively, “residents”).
2. Employees of CoreCivic and its subsidiaries and affiliated entities.
3. Certain third parties who perform services in our facilities (e.g., volunteers, contract or temporary staff) or who may be impacted by business practices of our vendors or suppliers.

We also acknowledge potential impacts on the communities where we operate and on the friends, loved ones, and family members of those entrusted to our care, and will endeavor to minimize negative and promote positive impacts on those communities and individuals

### III. Human Dignity and Salient Human Rights

#### A. Basis for Human Rights Commitments.

1. General Principles. Our human rights commitments are based on universal human rights principles, including our recognition that –
  - a. All human beings are born free and equal in dignity and rights;
  - b. Human rights are derived from the inherent dignity of the human person; and
  - c. Detained and justice-involved individuals retain their inherent dignity and other human rights that require respect and protection.
2. Instruments. Our human rights commitments are informed by accepted standards for domestic and international human rights, including the following –
  - a. U.S. constitutional law;
  - b. International human rights instruments, including the United Nations' Universal Declaration of Human Rights, Standard Minimum Rules for the Treatment of Prisoners, and Basic Principles for the Treatment of Prisoners; and
  - c. UN Guiding Principles on Business and Human Rights.
3. PRIDE Values. Our commitments also are based on our corporate purpose to better the public good and our PRIDE (Professionalism, Respect, Integrity, Duty, Excellence) values, which call on us to create opportunities for a quality standard of living and career growth for our employees and the ability for the immigration and justice-involved persons entrusted to our care to live a life of respect and dignity.

#### 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 V.E below.
2. For purposes of implementing this policy, we will prioritize rights identified as “high” and “very high” salience.

### 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 administrative or ministerial changes) will require approval by the President and Chief Executive Officer and the Board.

## 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 establish and maintain acceptable standards of behavior and performance.
2. Training on this policy will be included as a component of our regular pre- and in-service programs, including –
  - a. Pre- and in-service (annual) Code of Ethics training;
  - b. Core leadership training programs, including CoreCivic University; and
  - c. Training programs or modules that relate to salient human rights.

### D. Residents. Consistent with applicable legal and contractual requirements, we will make residents aware of this policy through inclusion in resident handbooks and training programs, and seek to promote conduct by residents that is consistent with the human rights commitments in this policy.

### E. Risk Assessment and Due Diligence.

1. We will regularly assess human rights risk, at enterprise and facility levels, using, among other things, the framework of the UN Guiding Principles on Business and Human Rights.
2. We will exercise due diligence not to employ persons or contract with third parties that present undue human rights risk, and to identify potential conflicts, as described in subsection F below.

## F. Handling Conflicts.

1. Our Executive Management Committee will be responsible for identifying conflicts, or potential conflicts, with the human rights commitments in this policy, when entering into material new transactions or contracts.
2. If a conflict or potential conflict is identified, the Executive Management Committee will make a positive determination that the conflict or potential conflict has been resolved or satisfactorily mitigated, consistent with the human rights commitments, before consummating the transaction or contract.

## 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.

We will assess the adequacy of existing mechanisms for purposes of preventing and detecting human rights violations and regularly evaluate the effectiveness of such mechanisms in achieving their objectives.

2. External Monitoring and Reporting. We are also subject to, and will seek to comply with, direct oversight by government agencies through audits, on-site monitors, and government reporting and investigative resources (e.g., inspector general and similar agencies).
3. Policy Progress Metrics. We will develop metrics for purposes of monitoring and reporting on our performance relative to this policy. Metrics may include –
  - a. Culture and/or climate survey results;
  - b. Grievance and misconduct reporting and investigation data;
  - c. Incident data; and
  - d. Training completion rates.

## 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.

- I. Non-Compliance. We will take action to address instances of non-compliance with this policy and human rights violations. Actions may include –
1. Employee disciplinary action, up to and including termination of employment;
  2. Corrective actions designed to mitigate future non-compliance, such as training and changes to policies or procedures;
  3. Contractual action against third parties; and
  4. Legal, contractual, and/or financial settlement.
- J. Remediation. Where we are identified as responsible for causing or contributing to an adverse impact on human rights that was not foreseen or prevented, we will seek to remedy or cooperate in the remediation of the situation through legitimate processes.
- K. Stakeholder Engagement; External Reporting. We are committed to continuing engagement with stakeholders and to enhanced transparency on human rights issues, utilizing generally accepted standards to inform and guide our approach to stakeholder engagement and external reporting, including, by way of illustration, the following –
1. Global Reporting Initiative (GRI)
  2. AccountAbility AA1000, Stakeholder Engagement Standard (2015)
  3. UN Guiding Principles on Business and Human Rights

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

\*Salient human rights are those that are at risk of the most severe negative impacts on people through the organization's activities and business relationships.