



3-33 Speaking Up and Non-Retaliation Policy

AUTHORITY: CORECIVIC COMPANY POLICY

FSC EFFECTIVE DATE: NOVEMBER 28, 2022

FSC SUPERSEDES DATE: NONE - FIRST ISSUE

FACILITY:

FACILITY SUPERSEDES DATE:

FACILITY EFFECTIVE DATE:

POLICY:

CoreCivic is committed to complying with all applicable laws, rules, and regulations and conducting business ethically, consistent with CoreCivic Policy 3-3 CoreCivic Code of Ethics and the company's P.R.I.D.E. values.

CoreCivic promotes a culture of speaking up about compliance and ethics concerns, reporting misconduct, participating in investigations, refusing to participate in inappropriate activity, and exercising legally protected rights, without fear of retaliation.

CoreCivic employees and affiliates have the right and responsibility to report conduct or activity by any other employee, affiliate, or any other person doing business with or for CoreCivic that appears to violate applicable laws, rules, or regulations or the CoreCivic Code of Ethics or other company policies. Reporting misconduct and concerns about ethical behavior (sometimes referred to as "whistleblowing") is an important tool in achieving the company's compliance objectives and maintaining an ethical organizational culture.

No retaliation will be taken against an employee or affiliate who engages in good faith in activity protected by this policy.

Any employee who engages in retaliation is subject to discipline up to and including termination.

The company also reserves the right to take disciplinary action against someone who acts in bad faith, such as by knowingly making a false allegation or providing false or misleading information in an investigation.

DEFINITIONS:

Administrative Duty Officer (ADO) - An administrative team-level facility employee designated to be "on call" (i.e. readily available upon short notice), approved for such assignment by the appropriate CoreCivic Vice President, Facility Operations, to assume the required duties and responsibilities of the Warden/Facility Administrator during non-business hours.

CoreCivic Ethics Line - The dedicated resources established to provide 24/7 availability for reporting misconduct, raising concerns, and asking questions about ethics and compliance matters on a confidential and, if desired, anonymous, basis, including via website (www.corecivic.com/ethicsline), email (Ethics@CoreCivic.com), or telephone (800-461-9330).

Facility Leader - For the purposes of this policy, the on-site chief executive officer responsible for the operations of a CoreCivic facility. This title corresponds to the positions of Warden, Facility Administrator, Facility Director, Facility Manager, or equivalent, at each CoreCivic work location. The Facility Manager serves as the lead CoreCivic employee at CoreCivic leased facilities where another agency manages the facility.

Facility Support Center (FSC) - CoreCivic's corporate headquarters where employees provide support, direction and oversight in the management and operation of the company's correction, detention, residential, and community corrections facilities, as well as the operation of CoreCivic's Properties division. This includes any and all locations operated by CoreCivic for this purpose.

Misconduct - Conduct or activity by any employee, consultant, volunteer, or any other person doing business with or for CoreCivic, that appears to violate applicable laws, rules, or regulations or the CoreCivic Code of Ethics or other company policies, including but not limited to corruption, fraud or similar unlawful activities, as well as gross mismanagement of a public contract, gross waste of public funds, abuse of authority relating to a public contract, a substantial and special danger to public health or safety, or violation of law, rule, or regulation related to a public contract (including the competition for or negotiation of a contract).

P.R.I.D.E. - An acronym used to represent company values exhibited by **P**rofessionalism, **R**espect, **I**ntegrity, **D**uty, and **E**xcellence.

Retaliation - Action or behavior described below in section C. Non-Retaliation.

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PROCEDURES:

A. REPORTING

1. Any employee or affiliate who becomes aware of apparent or potential misconduct should promptly report all known and relevant information to one of the following company resources:
 - a. The person's direct or indirect supervisor;
 - b. At the facility level, the Human Resources (HR) Manager, an Administrative Duty Officer (ADO) staff member or other member of upper management, including a Facility Leader, HR Director, HR Business Partner, Managing Director, or Business Unit Vice President;
 - c. At the FSC level, any management-level FSC Human Resources employee or department head;
 - d. Any member of the Ethics & Compliance team up to and including the Chief Ethics & Compliance Officer (CECO); or
 - e. The CoreCivic Ethics Line via:
 - i. Website (www.corecivic.com/ethicsline);
 - ii. Email (Ethics@CoreCivic.com); or
 - iii. Telephone (800-461-9330).
2. Reports may also be made to the Audit or Risk committees of the CoreCivic Board of Directors or to the CoreCivic Office of General Counsel. Board Communication instructions are available through the Investors page of the CoreCivic website (<https://ir.corecivic.com/corporate-governance/governance-highlights>).

B. HANDLING OF REPORTS

Recipients of reports are expected to do the following:

1. Treat such information, including the reporting party's identity, confidentially and share such information only on a "need to know" basis, subject to the need to conduct an adequate review and investigation of the report;
2. For reports made on an anonymous basis, respect the reporting party's decision to report anonymously and maintain the confidentiality of the reporting party's identity to the best extent possible, subject to the need to conduct an adequate review and investigation of the report; and
3. Refer or escalate the report as required by this and other applicable CoreCivic policies, including but not limited to, CoreCivic Policies 1-24 Internal Investigations; 3-17 Harassment, Sexual Harassment; and 3-3 CoreCivic Code of Ethics.

C. NON-RETALIATION

1. Retaliation against an employee or affiliate for --

- a. Reporting, in good faith, what the employee or affiliate reasonably believes constitutes a compliance or ethics concern or apparent or potential misconduct,
- b. Participating in investigations, or
- c. Otherwise exercising legally protected rights with respect to reporting violations of laws or regulations, including but not limited to rights pursuant to applicable whistleblower protection laws,

is against CoreCivic policy and, in many cases, illegal and therefore is strictly prohibited, even if the report is not substantiated after an investigation.

2. Retaliation includes actions or behaviors that intimidate, threaten, coerce, or discriminate against someone because they engaged in activity protected by this Policy, or to impede an individual from engaging in activity protected by this Policy. Examples may include:
 - a. Taking or threatening to take formal discipline, such as a Problem Solving Notice (PSN) that includes suspension, demotion, or termination of employment or other service relationship (subject to subsection C.4 below);
 - b. Harassing or ostracizing an employee or encouraging others to do so;
 - c. Treating unfairly in an employment decision or denying an employment benefit to which the person was otherwise entitled or threatening to do so;
 - d. Intentionally causing, or threatening to cause, a materially negative impact on working conditions; and
 - e. Attempting to identify someone who engaged in activity protected by this Policy.
3. A report of alleged retaliation is subject to referral to the FSC Investigations Counsel in accordance with CoreCivic Policy 1-24 Internal Investigations.
4. CoreCivic may address misconduct or performance-related issues before or after an individual has engaged in activity protected by this policy, so long as such activity is not the cause of the performance review or corrective action.
5. An action that would otherwise constitute retaliation under this Policy is not excused because it is taken at the request of a direct or indirect supervisor or a government official; provided, however, that in making a determination of retaliation under this Policy, the company may take all relevant circumstances into account, including whether action was taken as a result of a non-discretionary directive by a government official acting within the scope of their authority.

Any person receiving a request or directive to engage in any action that might constitute retaliation by a supervisor or government official should report the request or directive pursuant to section A. Reporting, above, or seek guidance from the CoreCivic Office of General Counsel.

D. VIOLATIONS; DISCIPLINARY ACTION

Violations of this policy are subject to appropriate corrective action pursuant to CoreCivic Policy 3-36 Employee Corrective Action. Violations include:

1. Retaliation, as described above in section C. Non-Retaliation; and
2. Knowingly making a false allegation, providing false or misleading information in the course of an investigation, or otherwise acting in bad faith with regard to a report of misconduct.

E. EXTERNAL REPORTING

1. This Policy is not intended to prevent or interfere with reporting to any government agency or any other activity protected by law related to reporting misconduct.
2. Employees may report suspected misconduct to the U.S. Securities and Exchange Commission (SEC), the U.S. Department of Justice (DOJ), the U.S. Department of Homeland Security (DHS), the U.S. Department of Labor, or any other appropriate government or contracting

agency, including but not limited to, applicable federal, state, or local agencies with adjudicative, legislative, regulatory or contractual oversight responsibility for the company's operations.

3. In order to be eligible for a whistleblower bounty under SEC rules, the reporting party must report directly to the SEC. If the issue has been reported internally first, the reporting party must report the matter to the SEC within 120 days of the internal report in order to be eligible for the whistleblower bounty.
4. If an employee is subject to an adverse employment decision as a result of whistleblowing, an employee may be required to file a complaint with the Department of Labor within 30, 60, 90, or 180 days of the alleged violation, depending on the type of violation alleged (a failure to report such claims within any such applicable window does not foreclose any other available legal remedies).
5. CoreCivic facilities operating under contracts with Federal government partners must post either 3-33AA Whistleblower Notice 2023 (DOJ contracts) or 3-33BB Whistleblower Notice 2023 (DHS contracts) on all employee notice bulletin boards.
6. Employees choosing to report to an external resource have the right to hire their own attorney, at their cost, to represent them in any such reporting, proceeding or other action.
7. Employees who report externally will be protected by the terms of this Policy just as if they reported internally as outlined above under section A. Reporting.

F. COMMUNICATION

1. The Ethics & Compliance team will take affirmative steps to promote this Policy, including but not limited to, issuing communications to employees at least twice per year and via the company's intranet reminding employees of their reporting options and protections.
2. In conjunction with CoreCivic's established employee performance management process, evaluators may recognize an employee's performance in satisfying the requirements and expectations established in CoreCivic's Code of Ethics, P.R.I.D.E. values, and other company policies.

APPROVAL/REVIEW:

This policy has been approved by Scott Craddock, Vice President and Chief Ethics and Compliance Officer; David Churchill, Executive Vice President and Chief Human Resources Officer; Patrick D. Swindle, Executive Vice President and Chief Operating Officer; and Cole Carter, Executive Vice President and General Counsel, and will be reviewed annually by the Chief Ethics and Compliance Officer and General Counsel or their qualified designees.

APPLICABILITY:

All CoreCivic and Subsidiary Facilities and Locations

APPENDICES:

3-33AA Whistleblower Notice 2023 (DOJ - U.S. Marshals Service [USMS] and Bureau of Prisons [BOP])
3-33BB Whistleblower Notice 2023 (DHS - U.S. Immigration and Customs Enforcement [ICE])

ATTACHMENTS:

None

REFERENCES:

CoreCivic Policy 1-24 Internal Investigations
CoreCivic Policy 3-3 Code of Ethics
CoreCivic Policy 3-36 Employee Corrective Action
CoreCivic Policy 3-39 Leadership Principles