

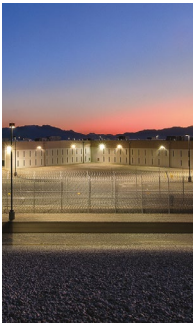
The CoreCivic Supplier Code of Ethics



INTEGRITY INTO ACTION



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Introduction

At CoreCivic, our Purpose is to help government better the public good. We deliver on this promise by putting Integrity into Action. In other words, doing the right thing in everything we do.

Fulfilling our Purpose requires teamwork. You, our valued supplier, are a critical member of the CoreCivic team. The CoreCivic Supplier Code of Ethics defines the standards of integrity we expect you – and all our suppliers – to uphold. The guidelines found in this Supplier Code are grounded in the CoreCivic Code of Ethics that highlights the values and behaviors expected from all CoreCivic employees.



CORECIVIC'S PURPOSE AND MISSION

CoreCivic's Purpose is to help government better the public good. We accomplish this through our Mission, as follows:

- **Safety** – operating safe and secure facilities that provide high-quality services.
- **Community** – helping people reintegrate into their communities.
- **Properties** – real estate solutions that provide value to governments and the people they serve.

INTEGRITY INTO ACTION

At CoreCivic, we believe in doing business the right way, guided by our values. Integrity into Action means we adhere to the following five Guiding Behaviors:

- *We help each other do the right thing.*
- *We meet our obligations with honest business practices.*
- *We keep our facilities and communities safe.*
- *We support a culture of respect and inclusion.*
- *We protect the assets and interests of our organization.*

We expect the same level of integrity from our suppliers. This Supplier Code explains the standards we expect from you. It also provides information to help you solve problems, report concerns and seek guidance. These standards and much of the information in this Supplier Code are derived from the CoreCivic Code of Ethics applicable to our employees. More information on our Mission, Values and resources available to report and seek guidance are contained there.

What We Expect from Our Suppliers

As a valued supplier and part of our team, CoreCivic expects you to partner with us in the service of our Mission, Guiding Behaviors and the standards outlined in the CoreCivic Supplier Code of Ethics.

The Supplier Code applies to any supplier providing goods or services to CoreCivic. A supplier includes anyone from direct partners to subsidiaries and subcontractors. In other words, this Supplier Code applies to your organization and anyone you work with to do what you are contracted to do on our behalf.

Management Partnership

We believe we best serve our stakeholders when our company and our extended teams are aligned in what we do and how we do it. We ask that the management of our suppliers be familiar with this Supplier Code. In a spirit of partnership, we ask that you identify any ways in which your organization's actions may be at odds with our Supplier Code so that we may work together to bring them into alignment.



How We Enforce the Supplier Code

We select and evaluate our suppliers in part based on adherence to the standards contained in the Supplier Code. Not adhering to the fundamental principles of the Supplier Code is of concern to CoreCivic and may introduce barriers to continued partnership.

Contract Language

This Supplier Code is in no way intended to conflict with or modify the terms and conditions of any existing contract. Rather, this Supplier Code complements the requirements of your contract with CoreCivic and is not intended to cover all the specific requirements and standards contained within it. In addition to requirements outlined in supplier contracts, we expect our suppliers to comply with the laws and regulations that apply to your work.

If you ever have any doubt as to the standard you are expected to uphold, first adhere to the applicable laws and regulations, then the contract terms, followed by this Supplier Code.

Oversight

CoreCivic monitors supplier relationships to make sure we are all doing our best to put Integrity into Action in our work. By collaboratively identifying problems and solutions, we best serve our stakeholders and our respective organizations. If your contract includes periodic performance reviews or audit rights, we expect you to participate in these activities in good faith. We also expect you to cooperate with any CoreCivic internal investigations involving the conduct of your employees in relation to your work with CoreCivic.



Reporting Issues and Concerns

At CoreCivic, speaking up is a basic part of putting Integrity into Action. Everyone should feel free to ask questions and share ideas for improvement. We want you to speak up about your concerns and any violations of the Supplier Code, including misconduct by CoreCivic employees. You may voice concerns and make reports directly to your business contact at CoreCivic or through our confidential Ethics Line administered by CoreCivic Ethics and Compliance. The Ethics Line is available 24 hours a day, seven days a week at 1-800-461-9330 or www.corecivic.com/ethicsline with an option to remain anonymous if you wish. CoreCivic prohibits retaliation against employees and suppliers that report misconduct in good faith.



Maintaining a Culture of Respect and Inclusion

Everyone has the right to be respected and treated fairly. We all deserve a welcoming place to work. CoreCivic believes our supplier relationships are most effective when our suppliers uphold the same commitment to respect and inclusion that we ourselves maintain in our Employee Code of Ethics.

Treating Each Other with Respect

We ask you to join us in working actively to make sure everyone is treated with dignity and respect.

You can join us in treating each other with respect when you:

- Use language that is respectful and considerate of others.
- Avoid harassing behavior including unwanted sexual advances or pressuring another person to engage in a relationship.
- Avoid using disparaging terms or remarks toward others when posting or sharing content on social media platforms.
- Speak up if you see or hear disrespectful behavior.
- Seek help or guidance when needed.

Promoting Equal Opportunity

The diversity of our teams makes us stronger and better at what we do. We believe that our most effective suppliers include people with different backgrounds and experiences.

You can join us in promoting equal opportunity when you:

- Create workplaces free from discrimination.
- Include diverse perspectives on your teams.
- Prohibit discrimination related to 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.

Protecting Human Rights

At CoreCivic, we recognize the inherent dignity of the human person and the need to treat every individual with respect, with guidance from the United Nations Guiding Principles on Business and Human Rights among other international standards.

You can join us in protecting human rights when you:

- Maintain work environments that protect the legal and human rights of all.
- Assess and address any human rights risks in your supply chain.
- Speak up about any concerns of human rights violations.
- Uphold the standards and principles of [CoreCivic's Human Rights Policy Statement](#).

CoreCivic will report any credible information alleging that a supplier has participated in any human rights violations.

Complying with Labor Laws

We uphold labor laws for workers and prohibit any use of child or forced labor.

You can join us in protecting human rights when you:

- Comply with prohibitions against child and forced labor.
- Pay workers according to wage laws, including minimum wages and mandated benefits.
- Adhere to legal limits of weekly working hours and overtime laws.



Respecting Residents' Rights

We treat all residents with dignity and respect. We protect their legal and human rights to ensure safety and promote a reentry culture that ultimately reduces recidivism. The following expectations relate to services performed in our secure facilities or for those suppliers interacting with the resident population.

Responsible Stewardship

A “resident” is any person entrusted to our care or custody. CoreCivic respects and protects residents’ legal and human rights. If your work with CoreCivic involves interacting with residents, we ask that you act in a professional manner.

You can join us in being responsible stewards when you:

- Maintain resident safety, security and protection of property. Property includes personal and confidential information.
- Treat residents with respect.
- Maintain appropriate boundaries with residents by avoiding any exchange of information, gifts or items of value.

Preventing the Introduction of Contraband

Contraband endangers everyone at CoreCivic. It creates risk for residents, visitors and staff. Never bring contraband into our facilities. Likewise, do not assist with contraband in any way. We expect you to report any suspicion of contraband immediately.

EXAMPLES OF CONTRABAND

- Firearms, explosives and weapons.
- Prohibited tools.
- Nicotine products, drugs and other controlled substances.
- Cash and cash equivalents.

Keeping Facilities and Communities Healthy, Safe and Secure

Workplace Safety and Health

We keep our workplaces safe. The people who live, work and volunteer in our facilities depend on that. Getting safety right means we can focus on what is best for those in our custody and in our community.

When performing work in our facilities or on our grounds, we ask you to:

- Follow CoreCivic safety and security policies and procedures.
- Take action when safety concerns are brought to your attention.
- Report any safety concerns to your business contact at CoreCivic.

Environmental Responsibility

We protect our communities and reputation by protecting the environment. We ask our suppliers to help minimize waste and protect our property and the environment while engaged in work on our behalf.

You can join us in protecting the environment when you:

- Use approved methods to handle, store and dispose of toxic or hazardous materials.
- Report any spills or leaks as required as part of the incident-reporting and after-action procedures.
- Comply with all applicable environmental law, regulations and company policies.

Conducting Effective Background Checks

At CoreCivic, we conduct thorough, effective background checks. These checks promote the safety of our employees, residents and communities. We expect our suppliers working on site at secure facilities or interacting with resident populations to perform thorough background checks for employees in these settings.

Ensuring Proper Professional Licensing

CoreCivic expects you to hold and maintain the correct licenses, permits and registrations for the goods and services you provide. Coordinate with us on any circumstances where our license, permit and registration obligations overlap.

Doing Business with Integrity

Complying with Government Contracts

We serve our partners in government with integrity, honesty and dedication. As a responsible partner, we meet our contractual obligations and pass along those obligations to our suppliers where required (e.g., by “flowing down” clauses as required from our prime contract to subcontracts). By performing on contracts with CoreCivic, you may be required to meet certain contractual standards that we are required to flow down to our partners.

We expect you to follow all rules and be aware of responsibilities and restrictions applicable to you regarding:

- Upholding fairness and integrity in acquisition and procurement processes.
- Preparing and keeping records.
- Preparing or submitting accurate invoices or claims for payment.
- Complying with FAR flowdown clauses, as required by certain contracts.
- Complying with all other applicable laws, rules, regulations, and product and/or service safety and other industry acceptable standards.

What Is the Federal Acquisition Regulation (FAR)?

The FAR is a set of procurement and contract performance requirements that ensure fair competition and value in the government services marketplace. The FAR includes several obligations that apply to CoreCivic and, based upon the nature and value of certain goods or services provided, our suppliers. Examples of our obligations that may be incorporated into your contracts (“flowdown clauses”) include, but are not limited to:

- Prohibition of contracting with suspended or debarred contractors.
- The Mandatory Disclosure rule that requires immediate reporting of credible evidence of a violation of the civil False Claims Act or crimes related to the procurement process.
- Compliance with wage and labor provisions of the Service Contract Act.
- Anti-kickback procedures designed to prevent and detect possible violations of the Anti-Kickback Act.

Insider Trading

“Inside 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. If you are in possession of inside information related to CoreCivic, we expect you to keep it confidential and use it for legitimate business purposes, sharing only on a need-to-know basis.

Avoiding Conflicts of Interest

While engaged in professional work for CoreCivic, our employees make business decisions based on what is best for our company and those we serve. We also ask that our suppliers uphold this principle. If you have personal relationships or interests that may interfere – or appear to interfere – with your work for CoreCivic, we ask that you disclose them.

What Is a Conflict of Interest?

A conflict of interest exists whenever the personal interests of a supplier working on behalf of CoreCivic may interfere with the supplier’s professional responsibilities on behalf of CoreCivic. These interests may take many forms. For example, they may be:

- **Personal.** A conflict of interest would exist if you are attempting to become a CoreCivic supplier and you have a personal relationship with someone who works at CoreCivic. This relationship may make it difficult for people involved in supplier selection to act fairly. Supplier employees with personal relationships to primary business contacts at CoreCivic should disclose the relationships as soon as possible to ensure conflicts of interest are avoided.
- **Financial.** A conflict would exist if you have an investment in CoreCivic or a competitor. Your personal interests may influence the responsibilities you carry as a supplier for CoreCivic.
- **Organizational.** An organizational conflict may exist if you provide certain services to the government such as those granting unequal access to information or impaired objectivity in relation to your performance under a CoreCivic contract. A conflict may also exist if you provide certain services to a CoreCivic competitor.

Former Government Employees

Former government employees may be restricted from doing certain kinds of work with private companies, like CoreCivic, who do business with the government. Our suppliers who may be subject to post-government employment restrictions must strictly comply with them and make CoreCivic aware of any such restrictions.

Prohibition of Corruption

We prohibit kickbacks, bribes and all other forms of corruption. CoreCivic policies on business gifts and gifts to government officials provide boundaries to avoid scenarios where conflicts or the appearance of a conflict is taking place. If you interact with government officials on CoreCivic’s behalf, you must do so in accordance with our procedures designed to prohibit even the appearance of a conflict. Further, any gifts to government officials by our suppliers must comply with the law and CoreCivic’s

Gifts to Government Officials policy. No supplier should ever provide a gift or gratuity to a government official in connection with any official actions relating to CoreCivic, on behalf of CoreCivic or with the intent to improperly influence or direct official action in CoreCivic's favor.

Gifts and Entertainment

CoreCivic maintains a detailed policy on business gifts due to the unique nature of government contracting rules. To avoid scenarios that could appear to be bribes, kickbacks or gifts causing undue influence, CoreCivic employees may only accept gifts from suppliers if they fall within the guidelines as summarized below.

CORECIVIC GIFT POLICY SUMMARY

CoreCivic's gift policy defines a "gift" broadly as anything of value, including meals, travel and entertainment. Gifts generally fall into one of three categories:

General Gift Requirements

- Must be occasional in nature.
- Must be less than \$50 in fair market value.
- Must not occur during contract formation stages or otherwise appear to do more than foster goodwill.
- Must be connected to a bona fide meeting where you are physically present (e.g., meals and events).

Special Occasion Gift Types

- Supplier-branded advertising or promotional materials (pens, hats, coffee mugs, etc.) with a fair market value less than \$50 per occurrence, not to exceed \$150 per calendar year.
- Gifts associated with commonly recognized events (holidays, birthdays, anniversaries, etc.) with a fair market value less than \$50 per occurrence, not to exceed \$150 per year.

Always Prohibited Gift Types

- Cash.
- Gifts that could be construed as a bribe, kickback or other unlawful payment.
- Gifts intended to or appearing to influence company action or create undue influence.

If you are unsure about whether you can give or receive a gift, please contact CoreCivic Ethics and Compliance at ethics@corecivic.com for guidance.

Protecting Confidential Information

We protect confidential information whether it belongs to CoreCivic, one of CoreCivic's partners, a resident, an employee or a supplier. Our suppliers share the responsibility to protect such information while partnering with CoreCivic. Confidential information includes the company's proprietary information and the personal information of its employees and residents. When in possession of such information we expect you to:

- Safeguard the information using commercially reasonable precautions in relation to the type of information involved.
- Exercise commercially reasonable standards when in possession of such information.
- Handle and/or share such information only when authorized and in strict accordance with policy.
- Report any data breaches or issues immediately.

Retaining Documents

All documents and reports related to investigations, audits and litigation in relation to CoreCivic are confidential and may be required for a retention period as defined in your contract.

Securing Information Assets

CoreCivic's assets include everything we own, lease or are entitled to use. This includes systems, records, plans and intellectual property. We ask you to uphold and fulfill our information security standards and practices when accessing or in possession of CoreCivic assets.





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