

CoreCivic Code of Ethics: PRIDE in Practice



Table of Contents

Leadership Message	1
PRIDE in Practice	2
Our Code of Ethics: PRIDE in Practice	2
Our PRIDE Values	2
Stakeholder Commitments	2
Respect for Human Dignity	2
Why We Have a Code and How to Use It	3-4
Putting Our Values Into Practice	3
Everyone's Responsibilities	3
Taking PRIDE in Professionalism	3
Ethical Leadership: Manager Expectations at CoreCivic	4
Listen Up: Special Attention to Receiving and Escalating Reports	4
Speaking Up	5-7
How Do I Speak Up?	5
What Happens When I Speak Up?	5
Our Speak Up and Non-Retaliation Culture	6
Employee Grievance and Peer Review Process	6
PRIDE in Practice: Making Ethical Decisions	7
We Foster a Respectful and Safe Work Environment	8-13
Respect for Each Other	8
Respect and Dignity for Those in Our Care	9
Creating a Culture of Belonging	9-10
Protecting Data Privacy	10
Workplace Health and Safety	11
Safeguarding Our Residents	12
Protecting Our Communities and Third Parties	13
We Do Business With Integrity	14-18
Serving Our Government Partners	14
Standing Against Bribery and Corruption	15
Keeping Accurate Records	16
Participating Lawfully in the Political Process	17
Competing and Doing Business Fairly	18
Third-Party Relationships	18
We Fulfill Our Duty to CoreCivic and Our Stakeholders	19-25
Financial Integrity and Disclosure	19
Insider Trading	19-20
Conflicts of Interest	21
Business Gifts and Entertainment	22
Protecting Our Company Assets	23
Intellectual Property	24
Careful Communications and Social Media	25
Conclusion	26
Recap of Reporting Resources	26

Leadership Message

A message from Damon Hininger, Chief Executive Officer, and Patrick Swindle, President and Chief Operating Officer

CoreCivic has served as a dependable government partner for more than forty years. Our company wouldn't be able to provide these meaningful public services without you, Team CoreCivic. We find success when we make ethical decisions and practice respect for human dignity. At CoreCivic, we put **PRIDE in Practice** as we incorporate our values into our work each day.

CoreCivic's Code of Ethics is a guidepost on our journey to serve. The Code of Ethics, which applies to all of us, outlines the way we ought to treat those entrusted to our care, fellow co-workers, visitors of our facilities, business partners and others we serve alongside.

Thank you for doing your part to uphold CoreCivic's Code of Ethics. As always, we are deeply appreciative of the important work you do to help *better the public good*.

Our Code of Ethics: PRIDE in Practice

At CoreCivic, our behavior and decisions in the workplace reflect our high standards and expectations of ethical conduct and our commitment to better the public good. Our PRIDE values are at the center of the important work we do, and we put PRIDE in Practice by making ethical decisions at work each day.

Our PRIDE Values

- **Professionalism:** Leading by example with passion and commitment and conducting ourselves in a manner that is responsive to each other, our partners and those entrusted to our care.
- **Respect:** Treating all people with dignity, fairness and understanding.
- **Integrity:** Conducting ourselves ethically and honestly, and upholding the trust placed in us through support for each other and accountability to ourselves, our partners and the public.
- **Duty:** Answering the call to serve and responsibly fulfill our obligations to each other, our partners, the public and those entrusted to our care.
- **Excellence:** Achieving exceptional results through innovation and an unwavering commitment to quality and self-improvement.

Stakeholder Commitments

We serve a diverse group of internal and external stakeholders at CoreCivic. Ethics is at the heart of our commitments to them. Our CoreCivic colleagues, residents and program participants, government partners and investors — and the local communities we serve — all count on us to put PRIDE in Practice through our business decisions and interactions.

We Put PRIDE in Practice When:

- **CoreCivic Colleagues:** We create a work environment that is collaborative and professional. We hold each other accountable to the highest standards of mutual respect and ethical behavior.
- **Our Residents and Program Participants:** We provide safe and humane operations and programs that treat all individuals with dignity and respect. We improve and maximize the outlook of our residents and program participants, their families and local communities when we fully understand our commitment to human rights and what it means to put people first by practicing respect for human dignity in all that we do.
- **Our Government Partners, Business Partners and Investors:** We communicate clearly and transparently. We are honest and accurate in all records and disclosures, understanding that the success of CoreCivic depends on the trust built with our government partners and investors.
- **The Communities We Serve:** We recognize that carrying out our ethical responsibilities to the communities in which we operate is critical to our mission. Preventing harm in our communities, as well as proactive efforts such as our Community Relations Committees, charitable contributions and volunteer efforts, demonstrate our PRIDE values and improve the outlook for our communities and justice-involved citizens.

Policy Reference:

- CoreCivic Human Rights Policy

Respect for Human Dignity

Respect for human dignity is fundamental to our organizational culture and the ethical operation of our business. We are committed to upholding the human rights and dignity for our employees, the individuals entrusted to our care, program participants, our government partners and the communities in which we operate.

We put PRIDE in Practice in respecting human dignity when we commit to avoiding harm, improving conditions and outcomes, and showing compassion for each other and those in our care and programs.

As CoreCivic employees, we are all expected to reflect our commitment to human rights by following our company's policies and procedures and putting people first in our interactions and decision-making. When we treat each other and those in our care with respect, we show the world that human dignity is at the center of all we do.

For more information on CoreCivic's commitment to human rights, please refer to our Human Rights Policy.

Why We Have a Code and How to Use It

Putting Our Values Into Practice

We put PRIDE in Practice by turning our values into action. The Code of Ethics (Code) guides us by showing how our ethical responsibilities apply to the work we do every day. Our company and facility-level policies provide more guidance on these topics. CoreCivic's Facility Standards of Conduct apply while working in a CoreCivic facility.

CoreCivic policies are listed in the Code to provide more detailed information on the related topic(s). Policies correspond to the Facility Support Center (FSC) library, which may differ from the policies that apply to your location. You should always consult your local policy. You are responsible for knowing the policies that apply to you.

Use this Code as a resource for how to conduct yourself in line with our PRIDE values. This will help avoid any actions that could break the law, damage our reputation or harm our stakeholders.

Everyone's Responsibilities

Our Code applies to everyone at CoreCivic, including all employees, members of the Board of Directors and all subsidiaries of CoreCivic, Inc. We are all expected to understand and follow the rules that apply to us in our roles at CoreCivic, including this Code and our Facility Standards of Conduct. By doing so, we reflect our PRIDE values in our work and foster a productive, respectful work environment.

Failure to comply with our Code will result in disciplinary action, up to and including termination. We also expect all third parties and individuals with whom we partner, and those who do business on our behalf, to act in accordance with our PRIDE values and our commitment to doing business with integrity.

The Board of Directors or a designated Board committee addresses questions involving the application of the Code to CoreCivic executive officers and members of the Board of Directors.

In rare circumstances, CoreCivic may waive the application of this Code. Any such waiver as applied to a company executive officer or member of the Board of Directors would require approval in writing by the Board of Directors or a designated Board committee. CoreCivic will promptly disclose any such waivers consistent with its obligations under applicable law and the New York Stock Exchange listing standards.

Taking PRIDE in Professionalism:

Our PRIDE value of Professionalism reminds us that we all play a role in creating a positive and productive workplace. It's vital to treat all colleagues, supervisors and individuals in our care and custody or programs with respect and dignity. We show our professionalism within our environment through the diverse ways we show up for our team each day, including how we communicate with one another, value each other and reflect our PRIDE Values in our work.

We do this by:

- Speaking with respect and being mindful of our tone of voice in all interactions, including, for example, radio communications.
- Arriving on time for work, meetings and assignments, ready to contribute to the team.
- Avoiding potentially harmful or offensive statements and using people-first language (i.e., "justice-involved individuals" or "residents" instead of "convict," "offender" or "prisoner") where appropriate.
- Addressing conflicts or concerns directly, professionally and in line with our Code and Facility Standards of Conduct.

Why We Have a Code and How to Use It

Ethical Leadership: Manager Expectations at CoreCivic

CoreCivic managers put PRIDE in Practice by acting as role models for all employees and facilitating a respectful work environment. With leadership comes additional responsibilities and expectations, including:

- Leading with integrity by modeling ethical behavior and decision-making.
- Talking about our Code and behavioral expectations with employees.
- Helping others to identify and address compliance risks.
- Celebrating conduct that reflects our PRIDE values and correcting behavior that violates our Code and policies.
- Demonstrating our B8 Leadership Principles.
- Reinforcing our commitment to human rights by helping employees understand what it means to practice respect for human dignity in their daily interactions and decisions.
- Encouraging employees to ask questions and share concerns, responding promptly to anyone who does raise a concern and supporting our commitment to non-retaliation.
- Understanding when and how to escalate a report of misconduct.

Listen Up: Special Attention to Receiving and Escalating Reports

Team members who supervise others have a responsibility to be approachable and to understand when to escalate matters according to policy. If you are a supervisor at CoreCivic, take the following steps when an employee comes to you with a concern:

- Listen thoughtfully to the reported concern.
- Apply the Code, our PRIDE values, B8 Leadership Principles and our other policies to address the concern.
- Work with available resources, as needed, or refer the concern to someone who is in a better position to resolve it.
- Treat the information reported and the identity of the reporter with discretion, sharing only as required to address or refer to the concern.
- Follow up with the person who raised the concern to let them know it was addressed.

Policy Reference:

- CoreCivic Policy 1-24 Investigations Counsel-Internal Investigations

An employee's concern may raise challenging issues that you may not have the ability or authority to address alone. In those cases, you may need to work with another person or department, such as your supervisor, the Human Resources department, a department head or other subject matter expert.

In addition, CoreCivic policy requires that certain types of allegations be referred, or escalated, for review and, when appropriate, formal investigation. For example, the allegation must be escalated if:

- It is against a high-level leader, such as an FSC employee or facility director or department head, or
- It involves sexual harassment, falsification of records, inaccurate claims for payment, accounting or auditing issues, retaliation or certain other serious allegation types.

If you have a question about whether a matter requires escalation, please contact your facility leader or departmental leadership, or Ethics & Compliance.

How Do I Speak Up?

Putting PRIDE in Practice means speaking up with ethics and human rights concerns, workplace misconduct or potential violations of our Code, policies or the law. Speaking up is not always easy, but each of us has a stake in doing things the right way. Speaking up preserves our personal integrity and protects our safety, our reputation and our ability to maintain the trust needed to be successful and grow, individually and as an organization. The sooner we learn about issues or potential issues, the better we can protect each other by working together towards resolving them.

There are options available when you need to raise a question or concern. It's often best to start with a local or departmental resource as most issues are easily addressed at this level, such as:

Your supervisor

- Facility or departmental leadership
- Local subject matter expert (for example, Human Resources or Quality Assurance)

In some cases, however, a local or departmental resource may not be the best option. The following resources are also available to assist you:

- Division leadership
- Facility Support Center (FSC) subject matter experts

Remember: You can always reach out to our Ethics & Compliance team at any time with your questions, concerns or to report a potential issue. The Ethics & Compliance team is an impartial resource that is available to listen to and offer guidance on any concerns you may have. The office is guided by principles of independence, fairness and confidentiality, and it seeks to treat all CoreCivic employees equally:

- You can contact members of Ethics & Compliance directly at the FSC or through the Ethics Line, which provides a safe way for you to report misconduct and to raise, explore and resolve concerns.
- The Ethics Line is available 24 hours a day, seven days a week at **1-800-461-9330** or www.corecivic.com/ethicsline.

Everyone at CoreCivic plays a role in creating a culture where we share our ideas, feedback and concerns openly and respectfully. When we encourage each other to share our thoughts and experiences, we create an environment where we each feel heard, enhancing our workplace culture and well-being.

What Happens When I Speak Up?

It is our collective responsibility to speak up. Our goal is to maintain a culture where you will be heard when you speak up. We maintain policies and procedures to encourage reporting, conduct formal investigations when necessary and take corrective action when violations are substantiated. We work to keep matters as confidential as possible throughout the process, sharing information only on a need-to-know basis. If you participate in an investigation, we expect you to cooperate fully.

Complaints or concerns about financial accounting, internal accounting controls or auditing matters will be handled per procedures established by the Audit Committee of our Board of Directors.

Policy References:

- CoreCivic Policy 3-43 CoreCivic Ethics Line
- CoreCivic Policy 1-24 Investigations Counsel-Internal Investigations
- CoreCivic Policy 3-35 Employee Corrective Action

Our Speak Up and Non-Retaliation Culture

We should all feel comfortable asking questions and raising concerns, and we support each other in doing so. CoreCivic does not tolerate retaliation. Retaliation discourages speaking up, which keeps us from learning information we need to know. Retaliation hurts CoreCivic's business, making us more vulnerable to risky conduct by others.

Individuals must never face retaliation, including threats, harassment or adverse employment action (such as termination, demotion, suspension or loss of benefits) in response to raising an honest concern or participating in an investigation, whether reported internally through CoreCivic reporting channels or externally to a government agency.

Remember, support from all of us as leaders and peers is necessary to create the foundation of open dialogue and transparency that we desire.

If you experience or witness retaliation, speak up and seek guidance immediately.

Employee Grievance and Peer Review Process

If you believe you have been unfairly disciplined, you may file an employee grievance. Ask your designated HR contact if you have any questions about how to file a grievance or how the process works.

Employees who are subject to a collective bargaining agreement (CBA) or who work at certain subsidiary organizations may be subject to a different process and should contact their designated HR manager for further guidance.

Policy Reference:

- CoreCivic Core-Civic Policy 3-33 Speaking Up and Non-Retaliation Policy

Policy Reference:

- CoreCivic Policies 3-6-01 Employee Grievance Procedures and 3-6-02: CoreCivic Peer Review Procedures

PRIDE in Practice: Making Ethical Decisions

It's possible to face situations at work that raise ethical issues. Sometimes, the right response is clear. In other situations, the right decision might not be obvious. We put our PRIDE values into practice by taking action to resolve the ethical issues we face.

Sometimes that means identifying the right resource to report misconduct; sometimes it means getting support to do what we know is right; and other times, it means getting help working through an ethical dilemma. It may be helpful to ask the following questions:

Identify

- Did you witness or become aware of potential misconduct by someone else?
- Are you concerned that a rule or policy might be violated by a planned course of action?
- Does something about the situation just feel "off"?
- Are you worried that someone, such as another employee or resident, will be harmed?

Examine

- Does the situation or action meet applicable legal and policy requirements?
- Does the situation or action align with our PRIDE values?
- How would this situation be viewed by other interested parties or if made public?
- Could the action result in harm to someone?

Act

- Consult the Code, your policy library and any more specific areas of guidance, such as post orders or audit standards, for guidance.
- Ask for help if you need support or are not sure about the situation! Seek support or guidance from a colleague, supervisor, subject matter expert or Ethics & Compliance.
- If you have a good faith belief that misconduct has occurred, speak up. See "How Do I Speak Up?" for more information.

Policy References:

- CoreCivic Policy 3-6-01 Employee Grievance Procedures
- CoreCivic Policy 3-6-02 CoreCivic Peer Review Procedures
- CoreCivic Policy 3-33 Speaking Up and Non-Retaliation Policy
- CoreCivic Policy 3-43 CoreCivic Ethics Line
- CoreCivic's Ethics Line Website
- Ethics Line FAQs
- Facility Standards of Conduct

Remember, if you need support or are unsure about a decision, or if something just does not feel right, it is always the right thing to do to speak up and seek guidance.

We Foster a Respectful and Safe Work Environment

Respect for Each Other

We all deserve to be treated with respect and dignity at work. Respect is one of our PRIDE values and our commitment to human rights means that recognizing everyone's worth and dignity is vital to our organizational culture and the ethical operation of our business. This commitment extends to the treatment of all CoreCivic employees, program participants and the residents in our care.

At CoreCivic, our goal is to create a culture of belonging and respect. We must all be committed to maintaining a work environment that is free from harassment, discrimination and other workplace conduct that is degrading or harmful. By embracing mutual respect at CoreCivic, we create a positive and professional work environment for everyone.

Our Code and company policies promote mutual respect in all workplace interactions. This includes respect for our right to be free from degrading or harmful conduct, such as harassment and discrimination. It also includes protection of our rights to engage in legally protected activities, such as reporting misconduct, discussing wages, benefits or other employment terms, forming, joining or supporting labor unions or bargaining collectively through representatives of your choosing.

At CoreCivic, we:

- Recognize that harassment, discrimination and other forms of degrading or harmful conduct are not permitted at CoreCivic, go against our PRIDE values and negatively impact human rights
- Pay attention to our work environment and are aware of behavior, by ourselves and others, that could be considered harassment, discrimination or harmful — and we address behavior that is inappropriate or that makes anyone feel uncomfortable
- Promote a workplace environment where everyone feels heard and valued, including by being mindful of respectful language and tone of voice in all interactions
- Take action if we witness, receive a report about or have concerns about discrimination, harassment or retaliation

Terms to Know:

Harassment is any unwanted or offensive behavior that is based on race, color, religion, sex (including pregnancy, sexual orientation or gender identity), national origin, age, disability, genetic information or any other legally protected characteristic. This behavior does not have to be sexual in nature to be considered harassment, but it can be. The behavior does not have to rise to the level of legal harassment to violate CoreCivic's policy or Code. Some examples of conduct that violates CoreCivic's harassment policy include:

- Saying or writing a racial, ethnic or sex-based slur
- Mimicking a person's disability
- Mocking a person's accent
- Threatening or intimidating a person because of their religious beliefs or lack of religious beliefs, or making fun of a person's religious garments, jewelry or displays
- Displaying offensive material (such as a noose, swastika or other hate symbols or offensive cartoons, photographs or graffiti)
- Impeding or blocking a person's movement, or any physical interference with their normal work environment

Sexual harassment can be:

- Written (such as sending sexually suggestive emails, texts or other communications)
- Verbal (such as sexually suggestive jokes or comments about gender-specific traits, or making sexualized gestures or comments even when this behavior is not motivated by a desire to have sex with the victim)
- Physical (such as intentionally touching another person's body or clothing, making sexual gestures, assault or coercing sexual intercourse)
- Visual (such as displaying sexually explicit materials, including AI-generated and deepfake images and videos)

We Foster a Respectful and Safe Work Environment

Discrimination is the different or unfair treatment of someone based on certain legally protected characteristics, including those described above. For example, deciding not to hire someone because they are pregnant.

PRIDE in Practice:

Treating all people with dignity, fairness and understanding is how we reflect CoreCivic's PRIDE value of Respect. We must be mindful of how we treat others when we come to work each day — our colleagues, visitors, volunteers, program participants, justice-involved persons and residents — and hold each other accountable to the highest standards of mutual respect.

Respect and Dignity for Those in Our Care

At CoreCivic, our commitment to treating everyone with dignity and respect extends to program participants and all justice-involved persons, including the individuals in our care and custody. We all play a role in respecting and protecting our residents' and clients' legal and human rights. We maintain professionalism in all interactions, including with our program participants and residents. Just as we expect respect from our colleagues, justice-involved persons and others in our programs deserve to be treated with dignity and have the right to be free from any form of abuse.

At CoreCivic, we:

- Demonstrate respect in all interactions with our residents and program participants by using thoughtful language and a professional tone
- Provide an appropriate, humane standard of living for residents in our Community and Safety facilities
- Intervene or report any instances of disrespectful interactions among colleagues, addressing these situations fairly and respectfully

Taking Pride in Our Actions: Interacting Appropriately With Residents and Program Participants

CoreCivic's commitment to respect and dignity extends to the treatment of all residents in our care and those served by our programs or services. We must promote a culture that prioritizes respect for human dignity while maintaining professional boundaries. We avoid any situations that could lead to improper relationships, inappropriate contact or other conflicts of interest with our residents, program participants or their family members, including:

- Giving special favors
- Sharing personal information as we would with a friend
- Engaging in romantic correspondence
- Engaging in communications with a resident or their family members outside of official duties
- Engaging in physical acts of a sexual or affectionate manner

PRIDE in Practice:

We are all responsible for embodying CoreCivic's commitment to human rights. We put PRIDE in Practice when we respect the human dignity of justice-involved persons, including CoreCivic residents and program participants, helping us to further our goals of promoting reentry and reducing recidivism.

Creating a Culture of Belonging

CoreCivic is committed to providing equal employment opportunities and creating a culture of belonging. We foster a welcoming culture where everyone is treated with dignity and respect, contributions are valued, and people are equipped for success.

At CoreCivic, we:

- Treat each other like we are part of the same team
- Respect each other's differences
- Make employment decisions based on experience, qualifications and past performance, not on any protected characteristics

Policy References:

- CoreCivic Policy 3-17: Harassment – Sexual Harassment
- CoreCivic Policy 8-13: Workplace Violence
- CoreCivic Facility Standards of Conduct
- CoreCivic Policy Chapter 14: Resident Rights

Policy References:

- CoreCivic Facility Standards of Conduct
- CoreCivic Policy Chapter 14: Resident Rights
- CoreCivic Policy 3-17: Harassment – Sexual Harassment
- CoreCivic Policy Chapter 13: Medical/Health Care Services

We Foster a Respectful and Safe Work Environment

Taking Pride in Our Actions: Promoting Belonging at Work

Here are a few ways that we can create a workplace where everyone feels like they belong:

- Treat each other with dignity and respect.
- Respect each other's opinions, beliefs, practices and experiences, even if they differ from our own.
- Seek input from everyone on the team.
- Include all team members in facility or department activities.

PRIDE in Practice:

CoreCivic's culture of belonging and inclusion extends to how we conduct our employment practices. Our goal is to cultivate a diverse set of opportunities that supports career growth and professional development for our employees.

CoreCivic provides equal employment opportunities to all. We make employment-related decisions based on individual qualifications and merit — not on protected or personal characteristics unrelated to the job.

Protecting Data Privacy

Our commitment to respecting human rights and dignity for all extends to protecting the personal or confidential information of employees and our residents and program participants. Our employees and residents trust us with personally identifiable information (such as Social Security numbers), protected health or medical data and financial records. We may encounter this information at work, and if the information is used or disclosed improperly, it can create risks of identity theft and violate privacy rights. We each expect that our personal information will be protected and used appropriately, and we must respect and protect the personal information of others.

At CoreCivic, we:

- Handle all personal information about colleagues, residents and program participants with care
- Keep all personal information about colleagues, residents and program participants secure and share it only with those who need it for legitimate work purposes
- Do not share confidential or personal information with anyone outside of CoreCivic, unless we have received express authorization or are required to do so
- Are aware of and comply with the company's data protection policies and procedures and stay informed about our developing data protection practices
- Understand that our Code and other CoreCivic policies are not intended to interfere with, restrain or prevent any employee from discussing wages, hours or other terms of employment

PRIDE in Practice:

By protecting the confidential and personal information of our employees, residents, program participants and partners with which we work, we can maintain our trustworthy reputation. Misuse of this information could result in significant fines and legal consequences for CoreCivic and jeopardize our reputation.

Policy References:

- CoreCivic Policy 1-5: Equal Employment Opportunity
- CoreCivic Policy 3-35: People and Culture

Policy References:

- CoreCivic Policy 3-09: Employee Records
- CoreCivic Policy 13-58: Medical Records
- CoreCivic Policy: 3-23: Employee Health
- CoreCivic Policy 13-74: Privacy of Protected Health Information
- CoreCivic Policy 1-7: CoreCivic Proprietary Information
- CoreCivic Policy 5-05: Artificial Intelligence

We Foster a Respectful and Safe Work Environment

Workplace Health and Safety

We are committed to maintaining a safe environment for our employees, residents, program participants, volunteers and anyone who visits our workplaces or facilities. We are all responsible for following the health and safety laws that apply to our business. We all deserve to work in a safe and healthy environment, free from hostility, violence or any other threatening behavior.

At CoreCivic, we:

- Do not engage in threatening, violent or intimidating behavior, and refuse to tolerate that behavior from anyone else
- Never come to work, or conduct business on behalf of CoreCivic, when impaired by any substance, including drugs or alcohol
- Understand that possessing — or facilitating the transfer of — any contraband, alcohol, illegal drugs or unapproved weapons on CoreCivic property is strictly prohibited
- Only use physical force in accordance with policy and never for punishment or retaliation
- Speak up about any unsafe working conditions or suspicious activity that could be dangerous to anyone at our facilities

Look Out For ... Contraband

Contraband in any CoreCivic facility presents a huge risk for our employees, residents and visitors. The presence of any of illegal drugs, weapons, alcohol or other prohibited items creates an opportunity for manipulation or coercion, violence, recidivism and unsafe conditions. We each play a role in preventing these events from happening at CoreCivic.

When we are aware and alert to the signs of contraband in our workplace, we can work together to protect everyone around us. Our ability to recognize the different ways that contraband could appear in our workplace is a crucial part of preventing prohibited items from entering any CoreCivic facility. Contraband can include the following:

- Firearms, explosives and weapons
- Prohibited tools
- Illegal drugs, controlled substances, alcohol and common products used as intoxicants or hallucinogens, including unauthorized medications
- Cash and cash equivalents
- Unauthorized nicotine products
- Unauthorized electronics and accessories, such as flash drives, cell phones, pagers, batteries and chargers

If you observe, or are suspicious of, contraband at CoreCivic, report it to your supervisor immediately.

PRIDE in Practice:

By operating safe and secure facilities, we contribute to CoreCivic's mission to better the public good. Working in a safe environment means that we can focus our efforts on best serving each other and those in our care. It's everyone's responsibility to raise concerns about any unsafe behavior at work.

Policy References:

- CoreCivic Policy 8-2: Facility Safety Authority/Team Safety Program
- CoreCivic Policy 8-13: Workplace Violence
- CoreCivic Policy Chapter 8: Safety/Emergency Procedures
- CoreCivic Policy Chapter 9: Security/Control
- CoreCivic Policy 3-15: Drug and Alcohol Program
- CoreCivic Policy 14-2: Sexual Abuse Prevention and Response
- CoreCivic Safety Policy 9-19: Suicide Prevention/Risk Reduction
- CoreCivic Safety Policy 9-1: Use of Force and Restraints
- CoreCivic Policy Chapter 13: Medical/Health Care Services

We Foster a Respectful and Safe Work Environment

Safeguarding Our Residents

Safety and security are our top priorities at CoreCivic, and we are all responsible for working to maintain the safety and security of residents in our facilities. Because we are entrusted with the care of our residents, it is our duty to keep them safe and out of harm's way.

CoreCivic takes sexual misconduct prevention and response very seriously. We are responsible for complying with the Prison Rape Elimination Act (PREA), which is a federal law that makes it a crime to commit acts of sexual misconduct in a correctional setting. Protecting our residents and their visitors from harassment, sexual abuse, self-harm and other threats of violence is part of our commitment to resident rights and treatment.

At CoreCivic, we:

- Take proactive steps to prevent situations that could lead to sexual misconduct and report inappropriate behavior immediately
- Make every effort to identify potential suicidal behavior by residents and respond immediately to any attempt at self-harm
- Maintain contraband-free facilities to keep our residents, staff and visitors out of harm's way, and we never assist with contraband or look the other way
- Promptly report any misconduct, abuse or other health and safety concerns and violations

Taking Pride in Our Actions: Providing Resident Access to Health Care

One way we respect the human rights of our residents is by helping them get access to appropriate physical and mental health care in the facilities we manage, which is paramount to creating a safe and secure environment at CoreCivic. By understanding our health services-related policies and protocols, we can do our part to contribute to the health and well-being of our residents.

We are committed to access for all residents to consistent, high-quality health care, including mental health care. To support this goal, we:

- Look out for residents' well-being by following our health services-related policies and protocols
- Speak up whenever we have a concern about a resident's health
- Do our part to make sure that adequate care is provided if we are a provider or have oversight responsibility for an employed or contracted provider

PRIDE in Practice:

Safeguarding the individuals in our custody reflects CoreCivic's commitment to integrity and accountability. Prioritizing their safety and well-being reflects our ethical standards, our dedication to upholding human dignity, and our commitment to fostering a safe, respectful environment for everyone.

We Foster a Respectful and Safe Work Environment

Protecting Our Communities and Third Parties

We protect the people in the communities we serve by keeping our facilities safe and helping our residents improve. Our commitment to safety reflects our care for the individuals we serve and work alongside. Following CoreCivic's safety standards is an essential part of protecting the well-being of our community and creating a safe environment for everyone.

At CoreCivic, we:

- Follow all safety and security protocols, including those related to resident accountability, perimeter control, contraband prevention and the safe, secure transportation of residents.
- Stay vigilant and promptly report issues and concerns that could impact community safety
- Comply with the environmental laws and regulations that apply to our business, aiming to reduce our environmental impact and support sustainable practices

Taking Pride in Our Actions: Respecting Our Environmental Obligations

We respect the rights and dignity of everyone around us, which includes protecting the environment. We comply with the environmental laws that apply to our business and look for opportunities to minimize waste and protect our property. We understand that operating our business impacts the environment, so we are conscious of minimizing any adverse effects on the environment. Our stakeholders value transparency, and we disclose our impacts in the areas of greatest stakeholder interest through our corporate responsibility and related reports.

- Follow our policies and procedures regarding recycling, energy and water conservation, pollution reduction and renewable energy alternatives.
- Comply with the approved methods and procedures in place for proper handling, storing and disposing of hazardous materials and promptly reporting any spills or leaks to management.
- Report any concerns about violations of environmental laws, or other environmental risks, to Ethics & Compliance.

PRIDE in Practice

When we follow our safety standards, we help to safeguard our residents, employees and visitors, thereby protecting the well-being of our community and creating a safe space for all. We put PRIDE in Practice when we actively follow our safety standards, showing our commitment to a safe and secure environment.

Policy References:

- CoreCivic Policy Chapter 7: Physical Plant
- CoreCivic Policy 8-4: Hazardous Materials
- CoreCivic Policy 8-5: Control of Hazardous Chemicals – Materials

Serving Our Government Partners

CoreCivic is committed to serving our government partners in accordance with our PRIDE values. We respect the integrity of the procurement process when competing for and securing government contracts. We're dedicated to obtaining business from our government partners in a fair and honest way and complying with the unique rules and obligations that apply to government contractors, including the Federal Acquisition Regulation (FAR) and other applicable state and local laws.

Working with government partners requires strict compliance with contract requirements to maintain transparency and accountability. We are all responsible for understanding and following all contract requirements, maintaining accurate and truthful records and promptly reporting any potential violations to uphold trust and integrity in our business.

At CoreCivic, we:

- Keep company and partner proprietary information confidential, submit good faith proposals and maintain accurate records
- Build appropriate relationships with third parties and never try to obtain information that would compromise the integrity of the procurement process
- Never falsify documents or submit false information in our bills or invoices, understanding that submitting false claims for payment to our government partners is illegal
- Recognize our affirmative obligation to report certain types of misconduct to our government partners, including potential violations involving bribery, fraud, gratuities, conflicts of interest, the False Claims Act and kickbacks
- Fully cooperate and provide complete information in any government audit or investigation
- Seek guidance from Ethics & Compliance before engaging in employment discussions with current or former government employees

Taking Pride in Our Actions: Adhering to Government Contract Requirements

As a provider of government services, we must always operate in compliance with our commitments and show ourselves to be responsible and trustworthy. Complying with the contractual requirements of our government partners is vital to protecting the integrity of CoreCivic. Failing to comply could lead to serious consequences, including harming our reputation, potential legal penalties or the loss of future opportunities to serve government partners in the future. When we adhere to the contractual requirements, we demonstrate our commitment to conducting our business ethically and maintaining strong relationships with our government partners.

- Understand and follow the terms and requirements of the government contracts you are involved with.
- Avoid personal or outside activities that could create a conflict of interest or interfere with your commitment to CoreCivic.
- Provide accurate and complete information in all documents, reports and communications related to government work.
- Always comply fully with procedures to establish that contract obligations are met before submitting claims to our partners.
- Meet resident programming standards by following program guidelines, making sure that courses are completed and related documentation is accurate.

Look Out For ... Submitting Requests for Payment to Government Partners

Government contractors have unique obligations when invoicing or requesting payment (also known as "claims") from government partners. For example, submitting false claims for payment to our government partners is illegal and against our PRIDE values.

Knowingly falsifying documentation is never acceptable and introduces significant risk to you and CoreCivic. If you ever feel pressured to misrepresent anything in company documentation or have concerns about the accuracy of any claim for payment, see Our Speak Up Culture or contact Ethics & Compliance for assistance.

We Do Business With Integrity

Additionally, certain CoreCivic subsidiaries may render items and services that are reimbursed under federal and state health care programs, including Medicare, Medicaid, and TriCare. CoreCivic and such subsidiaries, as applicable, must remain compliant with all health care fraud and abuse laws, including the federal Anti-Kickback Statute, the federal Civil Monetary Penalty Laws, the federal Physician Self-Referral (Stark) Law and any state corollaries.

Employees are also encouraged to ask questions and seek guidance related to proper billing procedures or records accuracy.

PRIDE in Practice:

Our success relies on doing business with integrity and treating people the right way. We do this through our honest and diligent work for our government partners. We understand that even the appearance of improper conduct is a risk to CoreCivic. It is our responsibility to comply with these and other regulations that apply to our business, and we must do everything we can to earn and maintain the confidence of our government partners.

Standing Against Bribery and Corruption

At CoreCivic, we're committed to conducting business free of corrupt behavior. There is zero tolerance for bribery or kickbacks here: We never offer bribes to, or accept bribes or kickbacks from, government employees, business partners or anyone else. We comply with U.S. and global anti-bribery and anti-corruption laws, and we expect that the third parties with which we work share our same commitment to conducting business with integrity.

Given the nature of our business, it is important to understand that there are additional requirements when working with government employees. Giving gifts to officials or receiving gifts from suppliers may raise questions, and we have policies in place to comply with all applicable laws and regulations. If you have any questions about whether a gift is appropriate or requires preclearance, contact Ethics & Compliance or consult CoreCivic Policy 1-9: Gifts to Government Officials for further guidance.

At CoreCivic, we:

- Never offer, promise, accept or approve bribes when conducting business on behalf of CoreCivic
- Accurately, truthfully and timely document all transactions and payments — never attempting to conceal or hide a payment
- Oversee the work of third parties who work for us carefully, because we may be deemed responsible for their actions
- Always obtain preclearance before offering gifts to government officials or employees and understand that all gifts to government officials must comply with our company policies

Terms to Know

A **gift** is anything of value, including meals, travel, accommodations and entertainment that is provided to a government employee or a person/company currently doing business with or seeking to do business with CoreCivic. We maintain strict gift rules and procedures to avoid appearances of bribes, unlawful gratuities or kickbacks.

A **bribe** is when someone gives or promises something of value in return for preferential treatment. Bribes can be offered in many forms and can be anything that's offered with the intention of gaining an improper business advantage.

Gifts can be considered bribes if they are used to induce or persuade or an unlawful gratuity if intended to reward a prior act.

A **kickback** is something of value that is given to induce someone to give them a contract or subcontract or in return for receiving a contract or subcontract. Like bribes, kickbacks do not have to involve cash and can include anything that may be of value to the other party.

Policy References:

- CoreCivic Policy 1-15: Retention of Records
- CoreCivic Policy 1-10: Response to Agency Requests
- CoreCivic Policy 3-34: Restrictions on Employment Discussions With Current Government Employees and Responsibilities of Former Government Employees

PRIDE in Practice:

We stand against bribery and corruption and expect everyone who works on our behalf to do the same. Even the appearance of a bribe, kickback or improper gift can be damaging to CoreCivic's reputation as a trustworthy business. Anything of value provided to a government employee must be approved by Ethics & Compliance.

Policy Reference:

- CoreCivic Policy 1-9: Gifts to Government Officials

Keeping Accurate Records

Our shareholders, partners, creditors and the public rely on us to accurately report information about CoreCivic. And, like all providers of government services, CoreCivic must keep accurate, truthful, complete and reliable records. The records we create must be an honest representation of facts and should never include false or misleading information. We create a large amount of electronic and paper documents every day, including training records, staffing documentation (including shift rosters), logs that show rounds or regular checks on a resident population, meeting minutes, expense accounts, payroll records and disclosure documents.

We are all responsible for following the policies, procedures and controls CoreCivic has in place to comply with the reporting and records requirements that apply to our business. We play a shared role in keeping and disposing of records, regularly checking applicable record retention schedules and complying with applicable recordkeeping requirements and laws. Do not destroy or alter any record that you are required to keep.

At CoreCivic, we:

- Record all expenses and costs honestly and accurately, including time worked, forms completed and expenses paid
- Remember that every paper and electronic record must be an accurate, truthful, complete and reliable reflection of our work
- Follow the policies that govern how we report information and retain records, including our accounting and financial reporting policies, our record retention policies and legal holds
- Cooperate fully and completely with internal and external auditors, including during government investigations and audits and Quality Assurance Division audits

Taking Pride in Our Actions: Cooperating With Government Investigations, Audits and Records Retention Requirements

CoreCivic is subject to strict government oversight and accountability measures. On-site government monitors and outside audits occur frequently — and we each play a role in CoreCivic's success with those endeavors.

During any official government inquiry, audit or investigation, we are all responsible for acting with integrity by cooperating fully and answering truthfully. We must always give honest, complete responses to the questions asked of us, and promptly provide accurate, complete and reliable records that are requested from us. Never manipulate or mislead any auditor or investigator — whether internal or external.

We are also responsible for complying with CoreCivic's records retention policy and procedures, as well as any legal holds. Even if we are concerned that a company record could be harmful to CoreCivic in a potential investigation, we may not destroy or alter the record.

If you realize that records are missing, incomplete, altered, untruthful or otherwise unreliable during preparation for an audit or inspection, seek immediate guidance from your facility's Quality Assurance Manager, the FSC Quality Assurance team or Ethics & Compliance.

Look Out For ... Document Falsification

Accurately, truthfully, completely and reliably documenting our activities is critical to doing business with integrity and promoting trust with our stakeholders. We must maintain awareness of our surroundings and make sure that our records accurately, completely and reliably reflect the activities and conditions of our operations. Speak up if you have questions about how to accurately, completely and reliably document something or if you have reason to believe a record is not accurate, complete or otherwise reliable.

We Do Business With Integrity

PRIDE in Practice:

Maintaining accurate, complete and reliable records promotes transparency and clarity with our government partners, business partners, investors, auditors, shareholders and the general public. Our business records allow CoreCivic to make strategic decisions, comply with legal requirements and continue the successful operation of our businesses. When we manage our records responsibly, we show the world that we are committed to doing business with integrity.

Participating Lawfully in the Political Process

At CoreCivic, we encourage employees to participate in the political process during their personal time and with personal resources. Because we work directly with government partners, CoreCivic is committed to complying with the laws and regulations that apply to our corporate political and government relations activities. To comply with legal requirements and our Government Relations policy, CoreCivic's political contributions and lobbying activities are subject to robust oversight, approval and compliance procedures, and we do not reimburse employees for political contributions. Additionally, only certain individuals are permitted to lobby for or on behalf of CoreCivic.

At CoreCivic, we:

- Keep personal political activities separate from the work we do for CoreCivic
- Do not engage in activity that could be considered lobbying on behalf of CoreCivic, unless we have received express authorization to do so
- Do not use CoreCivic resources or time to support personal political interests or candidates
- Never pressure another employee, supplier or other third party to make any political contribution, support any candidate or vote in a certain way
- Consult Ethics & Compliance if we are considering running for political or governmental office to avoid any potential conflicts of interest
- Understand that CoreCivic's political contributions require rigorous review and approval in accordance with CoreCivic's Government Relations Policy to comply with legal and ethical standards

Terms to Know: Lobbying

Lobbying refers to contacts with legislative or executive officials or staff on behalf of CoreCivic to influence legislative or executive action. There are designated individuals who are authorized to lobby on behalf of CoreCivic. Unless you have received express authorization to do so, do not engage in any activity that could be considered lobbying on behalf of the company.

Individuals who are authorized to engage in lobbying or political activities on behalf CoreCivic — or who manage others that do so — must follow our company policies and procedures to meet registration and disclosure requirements.

Given the nature of our business, it is important that we are aware of certain political activity that is never permitted here: **CoreCivic does not lobby for or against policies or legislation that would determine the basis for — or duration of — an individual's incarceration or detention.**

For further guidance, please see our Government Relations policy.

PRIDE in Practice:

We honor our commitment to CoreCivic's PRIDE value of Integrity with our unwavering commitment to ethics in our political involvement. We must always be mindful of the laws and regulations that apply to our business and keep our personal political involvement separate from our work for CoreCivic.

Policy References:

- CoreCivic Policy 1-15: Retention of Records
- CoreCivic Policy 1-10: Response to Agency Requests

Policy Reference:

- CoreCivic Policy 3-28: Government Relations

Competing and Doing Business Fairly

Conducting our business ethically means playing fairly. CoreCivic complies with antitrust and competition laws and regulations that promote a fair and free marketplace, and we do not participate in unethical or illegal business practices. We compete on our merits alone, earning our business on our sound reputation. This means that we do not engage in or take any actions that could appear to restrict competition or harm the market.

At CoreCivic, we:

- Win our business fairly, and we never agree to fix prices, coordinate bidding activity or divide up markets by customer or territory
- Do not make any agreements with competitors that could restrict — or even appear to restrict — competition
- Do not take unfair business advantage through misrepresentation, concealment, abuse of privileged information, manipulation or any other unfair business practice
- Never discuss confidential business strategies or plans with competitors
- Do not share or discuss competitively sensitive information with competitors, such as business plans, price or bid information or other confidential information — even in casual conversations

PRIDE in Practice:

We conduct our business in good faith and deal fairly with our business partners, because we take pride in how we conduct business. CoreCivic's success is backed by integrity, so that we can be proud of our work to better the public good.

Third-Party Relationships

CoreCivic works with third parties that share our commitment to doing business ethically. We conduct appropriate due diligence, carefully selecting third parties that share our commitment to honesty and integrity. We respect the rights of the third parties with which we work, including our subcontractors, vendors and consultants. We maintain professional boundaries with third parties, always working to meet our contractual obligations.

At CoreCivic, we:

- Understand that CoreCivic's reputation is tied to the conduct of the third parties with which we work, including our subcontractors, vendors, suppliers and consultants
- Expect our third-party business partners to comply with applicable government regulations and our Supplier Code of Ethics and act in line with our PRIDE values, including:
 - Following CoreCivic's safety standards
 - Complying with government contracting regulations
 - Protecting confidential information
 - Sourcing goods and materials responsibly
 - Disclosing information honestly, accurately and in a timely manner

Policy Reference:

- Supplier Code of Ethics

PRIDE in Practice:

Our PRIDE Value, **Integrity**, reflects that we must conduct ourselves ethically and honestly, upholding the trust placed in us. Our relationships with third parties are built on trust, and these relationships help drive the success of CoreCivic. Thus, we must always conduct our business in good faith and deal fairly with our business partners.

We Fulfill Our Duty to CoreCivic and Our Stakeholders

Financial Integrity and Disclosure

CoreCivic is a publicly traded company, which means that we are required to make timely, complete, accurate and understandable disclosures and reports to the U.S. Securities and Exchange Commission. Additionally, we publicly disclose our business and financial information in compliance with securities regulations and the New York Stock Exchange rules. Individuals both inside and outside of the company, such as employees, shareholders, government partners and auditors, expect financial disclosures to be reliable and properly maintained. Inaccurate financial reporting could undermine shareholder confidence, hurt our reputation and subject CoreCivic to fines and penalties.

At CoreCivic, we:

- Prepare and submit public disclosures, both positive and negative, in a timely, complete and accurate manner
- Accurately report all transactions, payments and expenses
- Follow appropriate accounting principles and other accounting standards when preparing financial statements or information
- Immediately report errors or concerns about financial entries

Taking Pride in Our Actions: Accuracy in Financial Records

To maintain our reputation of being a trustworthy company, CoreCivic must always create and maintain complete and accurate financial records. If you become aware of an error in financial data, speak up immediately and escalate the matter so the error can be properly disclosed and/or corrected. Any errors or omissions in our government partner billing must be escalated and fully reviewed to comply with mandatory disclosure rules as detailed in Submitting Requests for Payment to Government Partners.

If you think an event or occurrence requires additional disclosure — or that a past disclosure should be updated or corrected — be sure to express and escalate your concern.

PRIDE in Practice:

Our PRIDE Value, Excellence, reflects our commitment to fulfill our obligations to our partners and the public. Being truthful and accurate in our business and financial information allows us to fulfill that duty.

Insider Trading

It is illegal, against CoreCivic's Insider Trading Guidelines and inconsistent with our PRIDE values to trade in securities of a company while in possession of inside information. As a result of your relationship with CoreCivic, you may have access to inside information belonging to or otherwise concerning CoreCivic or another company, such as a supplier, competitor or acquisition target. We must be careful to protect inside information and never use it for personal gain.

Before inside information becomes public, we may not disclose it to anyone who does not have a business need to know such information, including, but not limited to, family and friends. We also may not trade, directly or indirectly, in securities of companies that are the subject of, or could be impacted by, such inside information. This means we cannot make trades ourselves, and we also may not "tip," or share inside information with another person, including, but not limited to, friends or family.

We Fulfill Our Duty to CoreCivic and Our Stakeholders

At CoreCivic, we:

- Know how to identify inside information and seek guidance if we are not sure whether a situation may involve inside information
- Only share inside information with individuals who have a business need to know it, and never with outside persons (including family and friends) who may trade on it
- Do not trade in securities based on inside information including, but not limited to, information about CoreCivic or another company with which CoreCivic has a relationship, such as a supplier, competitor or acquisition target
- Understand that “tipping” or providing inside information to others to facilitate trading securities, is illegal
- Comply with CoreCivic’s insider trading policies and procedures, including relevant trading window restrictions

Terms to Know:

Insider trading occurs when someone who has inside information about a company (1) buys or sells that company’s securities, benefiting from information they have that the market does not or (2) shares inside information with another person who may be expected to trade while in possession of the information.

Insider trading includes:

- Buying or selling a company’s securities while having inside information
- Sharing inside information with another person, such as a family member or friend, who may be expected to trade on that information (known as “tipping”)

Inside information (or material nonpublic information) is information that is not known to the public, or has been known by the public for a very short time, that a reasonable investor would consider important in a decision to trade securities.

Examples of inside information may include, but are not limited to:

- New or changing services or contracts
- Earnings or dividend figures
- A change in control or in senior management
- Information about litigation or pending legislation
- Proposed mergers, acquisitions or joint ventures
- Dispositions of businesses or significant assets
- Confidential information about other companies that we learn in our work for CoreCivic

PRIDE in Practice:

Our PRIDE value of Duty requires us to maintain the trust of our stakeholders, which means keeping our inside information ... inside. No trade is too small to be considered a violation, and the consequences of breaking insider trading laws are severe. Enforcement actions punishing insider trading can result in both significant civil and criminal penalties, including fines and jail time, for you or for the organization.

Policy Reference:

- CoreCivic Policy 3-21: Insider Trading

We Fulfill Our Duty to CoreCivic and Our Stakeholders

Conflicts of Interest

A conflict of interest can arise when our own personal, social, financial or political interests interfere with the interests of CoreCivic. Even the appearance of a conflict of interest could damage CoreCivic's reputation for doing business objectively and fairly, causing others to think that business decisions are made for the wrong reasons. It's important that we understand how a conflict of interest could arise and avoid situations that could create a conflict.

At CoreCivic, we:

- Avoid conflicts of interest that could prevent us from doing our job fairly or compromise our responsibilities to CoreCivic
- Never use our position at CoreCivic to attempt to obtain improper personal benefits, such as personal loans or guarantees, compete with CoreCivic or take for yourself opportunities the company might wish to pursue
- Do not exchange gifts or entertainment that may influence, or appear to influence, work-related decisions
- Understand that the interests of immediate family members, or individuals with whom we have a close personal relationship, can also create conflicts of interest
- Disclose any potential conflicts of interest as soon as possible

Taking Pride in Our Actions: Understanding Conflicts of Interest

Conflicts of interest create tricky situations that could lead to divided loyalty, poor judgment or the appearance of bias. It is impossible to identify every conflict of interest. There are, however, some relationships and activities that must always be disclosed:

- **Working With Family and Friends:** Personal relationships, such as family, friends or romantic relationships, can create a conflict of interest. If a relative or close friend is a co-worker, supplier or consultant for CoreCivic, you must disclose the relationship to your supervisor and avoid any conduct that may suggest favoritism towards that person or the company for which that person works.
- **Relationships With Residents:** Non-professional relationships with residents and program participants — whether they are pre-existing or formed while a resident is in CoreCivic's care or custody — can result in a conflict of interest and create serious consequences, including termination of employment and, in some situations, criminal prosecution.
- **Giving and Receiving Gifts and Entertainment:** Exchanging gifts and entertainment with people who do business with CoreCivic — or want to do business with CoreCivic — may appear to improperly influence our ability to make impartial business decisions.
- **Making Investments in Our Industry:** Industry-related personal investments and business ventures are not permitted if they conflict with your job responsibilities, compete with a CoreCivic business opportunity or influence your judgment about CoreCivic matters.
- **Outside Employment and Serving at Other Organizations:** Participating in outside work or activities could interfere with your responsibility to make work-related decisions in the best interest of CoreCivic. If you have a second job, it must not affect your ability to fulfill your responsibilities for CoreCivic, and you cannot perform work for an outside job using CoreCivic time or resources. You must seek approval from your Warden or designee (facility personnel) or department head (FSC, TransCor and RMS personnel) prior to accepting a new position.
- **Organizational Conflicts of Interest:** We must always remain fair and impartial when obtaining work with government partners. An organizational conflict of interest may occur if we bid on an RFP we designed, provide technical evaluation services for a contract we are also bidding on or have unfair access to nonpublic or proprietary information that is useful in preparing a bid or proposal. If such a conflict occurs, it could call our integrity into question and jeopardize procurement opportunities.

We Fulfill Our Duty to CoreCivic and Our Stakeholders

PRIDE in Practice:

When we are transparent in disclosing our conflicts and potential conflicts of interest, we are acting in line with our PRIDE value, Integrity. Although we always want to avoid conflicts of interests, we are oftentimes able to work together to evaluate and resolve potential conflicts.

Disclosing conflicts of interest does not mean we can never pursue interests outside of work. The sooner we disclose our conflicts or potential conflicts of interest, the sooner we can work together to resolve them.

If you have questions about a situation that might create a conflict, seek guidance from your manager. In general, potential conflicts should be addressed at the Warden/Administrator level for facility employees and at the Managing Director or Vice President level for FSC employees. Ethics & Compliance is also available as a resource for resolving conflicts of interest.

Policy References:

- CoreCivic Policy 3-30: Personal Relationships
- CoreCivic Policy 3-27: Business Gifts
- CoreCivic Policy 3-45: Conflicts of Interest

Business Gifts and Entertainment

There may be times when gifts and entertainment may be appropriate to build goodwill and foster positive business relationships. We must always use good judgment when exchanging gifts or participating in business entertainment. Our policies prohibit gifts to government officials or employees without prior clearance from Ethics & Compliance, and limit business gifts to or from others to avoid appearances of impropriety. We must always exchange gifts and participate in entertainment the right way: in line with our company policies, our PRIDE values and with the law — but never to gain an improper business advantage.

At CoreCivic, we:

- Do not exchange any gifts or business entertainment that are unlawful, create an appearance of improper conduct or could reflect poorly on CoreCivic
- Understand that specific rules apply when working with government employees, as covered elsewhere in this Code
- Only exchange gifts if they meet all policy requirements and align with our PRIDE values
- Avoid offering or accepting gifts with business partners during contract negotiations, requests for proposals or other formal contract formation activities
- Participate in business entertainment only if there is a legitimate business purpose

Policy References:

- CoreCivic Policy 3-27: Business Gifts
- CoreCivic Policy 1-9: Gifts to Government Officials

PRIDE in Practice:

We live out CoreCivic's PRIDE value, **Professionalism**, when we build our business relationships on fairness and trust. Exchanging gifts and entertainment can help to build these relationships, but only if it is done the right way.

We Fulfill Our Duty to CoreCivic and Our Stakeholders

Protecting Our Company Assets

When we use our company assets responsibly, we're able to operate efficiently and bring value to our stakeholders. Our company assets include anything that belongs to CoreCivic, both tangible and intangible, from our physical property and equipment to our financial assets, information technology (IT) systems and company time. It's important that our company assets are only used for legitimate business reasons and that we protect them from loss, theft, damage, waste or other improper use.

At CoreCivic, we:

- Limit our personal use of company assets, including our mobile devices and computers, making sure that personal use does not interfere with our job responsibilities
- Safeguard our intellectual property and report any concerns about unauthorized or unethical use of our intellectual property or other assets
- Avoid waste and always use good judgment when incurring expenses on behalf of CoreCivic
- Never use our information systems to access, store, create or transmit any inappropriate or illegal materials, including anything that is offensive, discriminatory or harassing
- Understand that, subject to applicable law, the information sent, received, communicated and stored on our IT systems is not private, and that CoreCivic has the right to review, save and/or destroy all content that is stored or transmitted using our IT systems

Taking Pride in Our Actions: Responsibly Using Our Technology in the Workplace

Many of us rely on technology in the workplace to help us perform our jobs effectively. We must always use our company technology responsibly, including our physical equipment, such as phones and computers, as well as CoreCivic's IT systems.

There are many ways we can help protect our IT, including:

- Always following CoreCivic's company policies and procedures that are designed to protect our systems from unauthorized access
- Being aware of phishing or other attempts to scam or uncover sensitive company information
- Not storing company proprietary or confidential information on personal devices or accounts
- Not transmitting personally identifiable information, such as Social Security numbers, to recipients that do not have a legitimate business need for the information

Policy Reference:

- CoreCivic Policy 1-8: Use of Communication Devices, Computers and the Internet

Some CoreCivic employees rely on our IT systems to work remotely. It's important to keep devices up to date, including the security software on our devices. We must always work from a secure network, connecting to CoreCivic's VPN when working away from a trusted, password-protected Wi-Fi network. When working remotely, use only CoreCivic devices when working on CoreCivic materials and remember to save company work to CoreCivic systems.

If you have concerns about cybersecurity or questions about using our IT systems remotely or in one of our facilities, seek guidance and immediately bring reports to the IT help desk.

PRIDE in Practice:

When we work together to protect our company assets and data, we contribute to the success of CoreCivic's business. Remember that fraud, waste and carelessness all have a direct impact on our ability to operate efficiently, so be sure to always use company assets responsibly.

We Fulfill Our Duty to CoreCivic and Our Stakeholders

Intellectual Property

CoreCivic's intellectual property (IP) includes our copyrights, patents, trademarks, trade secrets and other proprietary information. We understand that IP is one type of company asset that we must protect. We must also respect the IP of vendors, government partners and other third parties with which we work.

At CoreCivic, we:

- Use CoreCivic's IP only for the benefit of the company
- Understand that CoreCivic's IP includes the works created during our employment at CoreCivic or using CoreCivic resources
- Maintain the confidentiality of CoreCivic's nonpublic IP
- Report any concerns about any unauthorized or unethical use of our IP or other assets

Look Out For ... Improper Use of Artificial Intelligence (AI)

The landscape of technology is changing every day and the risks associated with using new technology continue to grow. We may come across AI tools that could assist us with our work. Before using any AI tool, it's important to consider the potential risks to CoreCivic and to our company assets, including our IP. Remember to:

- Always seek permission and approval before downloading any AI tool on a company device or inputting any company information into an AI tool
- Follow company policy guidance on the types of information allowed for use in AI tools
- Only use Generative AI tools that have been approved by CoreCivic, personally verify that generated content is accurate and cite sources as required by policy

Taking Pride in Our Actions: Protecting Proprietary Information

We all have a duty to protect the privacy rights of everyone who entrusts us with their data.

In addition to sensitive employee and resident data, we may also have access to proprietary information about CoreCivic or the partners with which we work. This may include **information belonging to CoreCivic** that is not available to the public, such as strategic planning information or internal communications.

We may also have access to information **belonging to the government or our business partners**. Oftentimes, we are under legal and contractual obligations to protect the proprietary information we receive from the third parties with which we work, so we must extend the same level of care to the third-party information with which we have been entrusted.

If you have questions about whether information is proprietary, or whether you can share information, be sure to ask your manager or supervisor. And, if you are aware of an unauthorized distribution of proprietary information, be sure to report it immediately. See CoreCivic Policy 1-7: CoreCivic Proprietary Information for more information.

PRIDE in Practice:

At CoreCivic, we take steps to protect our own IP. However, our commitment to conducting business ethically also extends to respecting third-party IP. When we work with IP responsibly, we can protect its economic value and maintain the trust of the third parties with which we work.

Policy References:

- CoreCivic Policy 5-5: Artificial Intelligence
- CoreCivic Policy 1-7: CoreCivic Proprietary Information

We Fulfill Our Duty to CoreCivic and Our Stakeholders

Careful Communications and Social Media

The way that we communicate directly impacts how the world perceives CoreCivic. Our government partners, vendors and investors make decisions based on the information we share about CoreCivic. Thus, we must always communicate truthfully, consistently and accurately about our company. Because of this, only certain individuals are designated to speak on behalf of CoreCivic. When we communicate about our company with one voice, we can share important information in a way that aligns with our PRIDE values.

At CoreCivic, we:

- Only speak to the public on behalf of CoreCivic if we have received express permission to do so
- Refer the media to CoreCivic Public Affairs or a designated CoreCivic public information officer for comment if we are contacted by the media for an official statement from CoreCivic
- Understand that only designated employees are permitted to lobby on behalf of CoreCivic
- Use sound judgment in responding to requests or inquiries directed to CoreCivic from government partners and agencies, referring to others if we are not authorized to do so, and seek guidance from our supervisor if we are unsure to whom the request should be directed instead

Taking Pride in Our Actions: Using Social Media Responsibly

Social media is a powerful tool that can be used to share information and connect us to the world around us. However, social media can also impact our company's reputation and expose CoreCivic to potential risks if used improperly. It's important that our own personal social media posts can be distinguished from CoreCivic's corporate communications.

- Be clear that your posts online represent your own personal views, and not the views of CoreCivic.
- Never post or discuss confidential or proprietary information about CoreCivic or any of the third parties with which we work, including our government partners — or any confidential information related to our employees or residents.
- Avoid social media contact with residents, program participants or family members.
- Keep in mind that once something is published online or posted on social media, it may be impossible to control or delete forever.
- Understand that our Code and other CoreCivic policies are not intended to interfere with, restrain or prevent any employee from discussing wages, hours or other terms of employment.

Policy References:

- CoreCivic Policy 1-4: Employee Media Guidelines
- CoreCivic Policy 1-10: Response to Agency Requests
- CoreCivic Policy 1-25: Social Media Policy

Remember: If you identify yourself as a CoreCivic employee in your social media posts, e.g., including "CoreCivic" in an online bio or posting a photo in a CoreCivic uniform, your posts may be associated with and reflect on your work for CoreCivic.

Be sure that your social media activity shows respect and is in line with how you wish to present yourself to CoreCivic colleagues, our government partners and the rest of the world.

For more information, please refer to CoreCivic's Social Media Policy.

PRIDE in Practice:

Communicating honestly and transparently is in line with one of CoreCivic's B8 Leadership Principles, "Be Communicative." When we communicate about CoreCivic truthfully and consistently, we establish ourselves as a trustworthy company.

Conclusion

We put our PRIDE values into practice when we pursue the best interests of CoreCivic while considering our duties towards our stakeholders, including our obligation under our Human Rights Policy to practice respect for human dignity towards each other, program participants and residents in our care.

We are counting on one another to empower each other by sharing ideas, offering support and reinforcement for doing the right thing, and leading with integrity. Each of us also has an obligation to ask questions and raise ethical concerns if they arise. There are many options available to you if you need to raise a question or report a concern.

Start with a local or departmental resource, such as:

- Your supervisor
- Facility or departmental leadership
- Local subject matter expert (for example, Human Resources or Quality Assurance)

In some cases, however, a local or departmental resource may not be the best option. The following resources are also available to assist you:

- Division leadership
- Facility Support Center (FSC) subject matter experts

Remember: You can always reach out to our Ethics & Compliance team at any time with your questions or concerns, or to report a potential issue. The Ethics & Compliance team is an impartial resource that is available to listen to and offer guidance on any concerns you may have. The office is guided by principles of independence, fairness and confidentiality, and it seeks to treat all CoreCivic employees equally.

- You can contact members of Ethics & Compliance directly at the FSC or through the Ethics Line, which provides a safe way for you to report misconduct and to raise, explore and resolve concerns.
- The Ethics Line is available 24 hours a day, seven days a week at **1-800-461-9330** or www.corecivic.com/ethicsline.