

AKAL SECURITY



NATIONAL DIVISION EMPLOYEE MANUAL GENERAL POLICIES

HRG v05 - 12.07

TABLE OF CONTENTS

Title	Page
Table of Contents	i
Mission Statement.....	vii
The Akal Security Story.....	viii
1.0 General Policies.....	1.1.0-1
1.1.0 Mission, Vision, and Values	1.1.0-1
1.1.1 Mission.....	1.1.0-1
1.1.2 Vision.....	1.1.0-1
1.1.3 Values	1.1.0-1
1.2.0 Equal Employment Opportunity	1.2.0-1
1.2.1 Company’s Commitment	1.2.0-1
1.2.2 Employment Decisions	1.2.0-1
1.2.3 Reasonable Accommodation	1.2.0-1
1.2.4 Incident Reporting	1.2.0-2
1.3.0 Anti-harassment, Anti-discrimination, and Retaliation.....	1.3.0-1
1.3.1 Company’s Commitment	1.3.0-1
1.3.2 Sexual Harassment.....	1.3.0-1
1.3.3 Pregnant Employees.....	1.3.0-2
1.3.4 Employee’s Responsibility	1.3.0-2
1.3.5 Company’s Responsibility	1.3.0-2
1.3.6 Retaliation	1.3.0-3
1.4.0 At-Will Employment.....	1.4.0-1
1.4.1 Terms and Conditions	1.4.0-1
1.4.2 Existence of a Collective Bargaining Agreement (CBA)	1.4.0-1
1.5.0 Code of Conduct.....	1.5.0-1
1.5.1 Employee’s Responsibilities	1.5.0-1
1.5.2 Violations and Consequences	1.5.0-1
1.6.0 Confidentiality.....	1.6.0-1
1.7.0 Conflict of Interest.....	1.7.0-1
1.7.1 Guidelines for Full Disclosure	1.7.0-1
1.7.2 Performing Outside Work.....	1.7.0-1

1.8.0 Work Rules for Security Personnel	1.8.0-1
1.9.0 Negligence.....	1.9.0-1
1.10.0 Timekeeping.....	1.10.0-1
1.10.1 Hourly Employees	1.10.0-1
1.10.2 Legibility of Timesheets	1.10.0-1
1.10.3 Accuracy of Timesheets.....	1.10.0-1
1.11.0 Preventing Workplace Violence.....	1.11.0-1
1.11.1 Definition of Workplace Violence.....	1.11.0-1
1.11.2 Acts of Violence	1.11.0-1
1.11.3 Persons Affected by Prohibition of Violence	1.11.0-1
1.11.4 Employee Response to Violence	1.11.0-1
1.11.5 Company Response to Violence	1.11.0-1
1.12.0 Drugs and Alcohol.....	1.12.0-1
1.12.1 Environment Free of Drugs and Alcohol.....	1.12.0-1
1.12.2 Prescription and Over-the-Counter Medications	1.12.0-1
1.12.3 Drug Testing	1.12.0-1
1.13.0 Leave of Absence	1.13.0-1
1.13.1 Three Types of Leaves of Absence.....	1.13.0-1
1.13.2 Definitions.....	1.13.0-1
1.13.3 Family and Medical Leave Act (FMLA)	1.13.0-2
1.13.4 Statutory Leave of Absence: Unpaid	1.13.0-2
1.13.5 Nonstatutory Leave of Absence: Unpaid.....	1.13.0-4
1.14.0 Family and Medical Leave	1.14.0-1
1.14.1 Basic Eligibility Criteria for FMLA Leave.....	1.14.0-1
1.14.2 Limitations for FMLA Leave.....	1.14.0-1
1.14.3 Maintenance of Group Health Insurance	1.14.0-1
1.14.4 Reinstatement to Previous Job after FMLA Leave.....	1.14.0-1
1.14.5 Flexibility in Manner of Taking FMLA Leave.....	1.14.0-2
1.15.0 Personnel Records and Privacy	1.15.0-1
1.15.1 Access to Personnel Files.....	1.15.0-1
1.15.2 Employment Verification and Neutral Reference.....	1.15.0-2
1.15.3 File Retention and Maintenance	1.15.0-2
1.15.4 Personnel File Maintenance.....	1.15.0-3
1.15.5 Confidential Files.....	1.15.0-3
1.15.6 Medical Files.....	1.15.0-4
1.15.7 Separate Files.....	1.15.0-4

1.15.8 Privacy and Notice of Search Authority	1.15.0-4
1.15.9 Polygraph and Lie Detector Tests	1.15.0-5
1.15.10 Personal Property	1.15.0-5
1.16.0 Media	1.16.0-1
1.16.1 Employees' Response to Media Representatives	1.16.0-1
1.16.2 Akal Security's Media Spokesperson	1.16.0-1
1.17.0 Computer Use	1.17.0-1
1.17.1 For Official Use Only	1.17.0-1
1.17.2 Property of Akal Security	1.17.0-1
1.17.3 E-Mail is Discoverable	1.17.0-1
1.17.4 Privacy and Appropriate Use	1.17.0-1
1.17.5 Network Security	1.17.0-2
1.18.0 Problem Solving	1.18.0-1
1.18.1 Addressing the Problem	1.18.0-1
1.18.2 Facilitating a Resolution	1.18.0-1
1.19.0 Employee Protection Line	1.19.0-1
1.19.1 Workplace Wrongdoing	1.19.0-1
1.19.2 Reporting Workplace Wrongdoing	1.19.0-1
1.19.3 Calling the Employee Protection Line	1.19.0-1
2.0 Field Employee Manual	2.1.0-1
2.1.0 Expectations of Security Officers	2.1.0-1
2.1.1 Objectives of Security Officers	2.1.0-1
2.1.2 Limitations of Security Officers	2.1.0-1
2.1.3 Backup and Assistance	2.1.0-1
2.1.4 Decision-making Authority and Consequences for Insubordination	2.1.0-2
2.1.5 Scheduling	2.1.0-2
2.1.6 Timely Reporting for Duty	2.1.0-2
2.1.7 Responsibility for Post Equipment	2.1.0-2
2.1.8 Post Sign-In Sheet	2.1.0-2
2.1.9 Post Check-In	2.1.0-2
2.1.10 Emergency Relief	2.1.0-2
2.1.11 Personal Telephone Calls	2.1.0-3
2.1.12 Meals and Breaks	2.1.0-3
2.1.13 Tobacco in the Workplace	2.1.0-3
2.1.14 Transportation and Telephone	2.1.0-3

2.1.15	Reimbursements	2.1.0-3
2.1.16	Rehiring	2.1.0-4
2.1.17	Military Time	2.1.0-4
2.1.18	Evaluations and Pay Raises	2.1.0-4
2.1.19	Emergency Notice	2.1.0-5
2.1.20	Appearance on Posts While Off Duty	2.1.0-5
2.1.21	Distractions on Post	2.1.0-5
2.1.22	Regular Foot Patrols	2.1.0-5
2.1.23	Required Tools	2.1.0-5
2.2.0	Uniform Dress Code	2.2.0-1
2.2.1	Necessity for Officers to Be in Uniform	2.2.0-1
2.2.2	Description of Basic Uniform	2.2.0-1
2.2.3	Patches, Badges, and Other Insignias	2.2.0-1
2.2.4	Headwear and Neckwear	2.2.0-1
2.2.5	Leather Gear and Footwear	2.2.0-1
2.2.6	Jackets and Cold Weather Wear	2.2.0-2
2.2.7	Allowable Exceptions	2.2.0-2
2.2.8	Hair	2.2.0-2
2.2.9	Body Markings, Piercing, and Jewelry	2.2.0-2
2.3.0	Uniform Code of Conduct	2.3.0-1
2.3.1	Conduct While in Uniform	2.3.0-1
2.3.2	Conduct with the Public	2.3.0-1
2.3.3	Conduct with the Client	2.3.0-1
2.3.4	Conduct with Law Enforcement	2.3.0-2
2.3.5	Conduct with Ranking Officers, Management, and Staff	2.3.0-2
2.4.0	Safety	2.4.0-1
2.4.1	Reporting Injuries and Accidents	2.4.0-1
2.4.2	Responding to Emergency First Aid	2.4.0-2
2.4.3	Operating Vehicles	2.4.0-2
2.4.4	Using Firearms	2.4.0-2
2.4.5	Conducting Foot Patrols	2.4.0-3
2.4.6	Suspected Felony Offenders	2.4.0-3
2.4.7	Youthful Offenders	2.4.0-3
2.4.8	Suspected, Fleeing Misdemeanor Offenders	2.4.0-3
2.4.9	Safety in Judgment or Action with Others	2.4.0-4

2.5.0	Equipment and Vehicle Operation	2.5.0-1
2.5.1	Authorized Wearing of Equipment	2.5.0-1
2.5.2	Equipment Sign-out.....	2.5.0-1
2.5.3	Preventable Driving Accidents.....	2.5.0-1
2.5.4	Rental Vehicles or Other-Owned Vehicles	2.5.0-2
2.5.5	Personal Use of Company Vehicles	2.5.0-2
2.5.6	Passengers	2.5.0-2
2.5.7	Keeping Vehicles Clean	2.5.0-2
2.5.8	Criteria for Authorization to Drive.....	2.5.0-2
2.5.9	Driving Record and Annual Status Check	2.5.0-3
2.5.10	Operating Vehicles in Accordance with Laws	2.5.0-3
2.5.11	Defensive Driving	2.5.0-3
2.5.12	Reporting Damage.....	2.5.0-5
2.5.13	Accident/Incident Review	2.5.0-6
2.5.14	Personally Owned Vehicles.....	2.5.0-6
2.6.0	Use of Force	2.6.0-1
2.6.1	Definitions	2.6.0-1
2.6.2	Reasonable Force Standard	2.6.0-2
2.6.3	Criteria for Show of Force.....	2.6.0-2
2.6.4	Criteria for Use of Force	2.6.0-2
2.6.5	Levels of Force and Authorized Defensive Equipment	2.6.0-3
2.6.6	Unnecessarily or Prematurely Drawing of Equipment.....	2.6.0-4
2.6.7	Weapons of Opportunity in Emergency	2.6.0-4
2.6.8	Brutality.....	2.6.0-4
2.6.9	Pursuit.....	2.6.0-5
2.6.10	General Use of Force.....	2.6.0-5
2.6.11	Use of Force Model.....	2.6.0-5
2.6.12	Supervisor Notification	2.6.0-8
2.6.13	Emergency Medical Services Notification.....	2.6.0-8
2.6.14	Documenting Show-of-Force or Use-of-Force Incidents.....	2.6.0-8
2.7.0	Use of Firearms.....	2.7.0-1
2.7.1	Qualifications to Carry a Firearm.....	2.7.0-1
2.7.2	Carrying Approved Firearms.....	2.7.0-2
2.7.3	Necessity for Personnel to Be Armed	2.7.0-3
2.7.4	Show of Force	2.7.0-3
2.7.5	Protection of the General Public	2.7.0-3

2.7.6	Definitions	2.7.0-4
2.7.7	Conditions and Criteria for the Use of Deadly Force.....	2.7.0-4
2.7.8	Justification for the Use of Force	2.7.0-4
2.7.9	Using Firearms from Moving Vehicles.....	2.7.0-5
2.7.10	Fleeing Subjects	2.7.0-5
2.7.11	Warning Shots	2.7.0-5
2.7.12	Unnecessarily Drawing Firearms	2.7.0-5
2.7.13	Carrying Firearms While Off Duty	2.7.0-5
2.7.14	Reporting the Use of a Firearm	2.7.0-5
2.7.15	Use of Deadly Force on Animals	2.7.0-6
2.7.16	General Use of Firearms.....	2.7.0-6
2.8.0	Negligence.....	2.8.0-1
2.8.1	Reporting Acts of Negligence	2.8.0-1
2.8.2	Negligence in Reporting to Public Agencies	2.8.0-1
2.8.3	Negligence While Operating a Vehicle.....	2.8.0-1
2.8.4	Negligence with a Firearm	2.8.0-1
2.8.5	Negligence in Judgment or Action.....	2.8.0-2
2.8.6	Negligence Resulting in Injury or Death.....	2.8.0-2
2.8.7	Misconduct Resulting in Bodily Harm.....	2.8.0-2
2.9.0	Discipline, Grievances, and Chain of Command	2.9.0-1
2.9.1	Infractions and Disciplinary Action	2.9.0-1
2.9.2	Chain of Command	2.9.0-1
2.9.3	Grievance Procedure	2.9.0-2

Akal Security Mission Statement

Akal Security is dedicated to serving its clients, employees, and surrounding communities in *exceptional service partnership*. Akal Security's experience in providing security services to industry and government has earned the company an unparalleled reputation for quality and value.

Akal Security affirms that, in order to provide superior security services, it must maintain a superior organization and train and develop superior security officers. Akal Security shall maintain a favorable work environment for employees, provide fair compensation and the opportunity for participative management, and promote an equitable system for professional advancement.

The Akal Security Story

Akal Security was founded in 1980, bringing professional security services to local markets throughout New Mexico. By 1985, the Akal model of exceptional service had attracted clients in Texas, Arizona, Nevada, and California, from remote gold mines to modern office complexes. Akal was listed on *Inc. Magazine*'s list of the 500 fastest-growing companies in the United States for two consecutive years.

Government Division

In 1987, Akal began providing contract security services to the U.S. government and earned a reputation for consistently achieving quality results with cost-effective services. Akal received numerous contracts to protect critical national facilities, including White Sands Missile Range, U.S. Army Records Center, and DEA's International Intelligence Center. In 1992, the U.S. Marshals Service awarded Akal the first of many contracts to provide professional Court Security Officers (CSOs) to protect U.S. courthouses. Today, Akal remains the largest judicial security contractor in the United States, with more than 4,000 CSOs protecting nine of the 12 U.S. Judicial Circuits. In 2003, the U.S. Army awarded three contracts to Akal to provide security at Army bases and installations in eight states. Akal provides officers rather than military personnel, whose services are needed in other areas. Other Akal-serviced government contacts protect major, public office buildings and critical military installations.

National Division

Akal's National Division spans the continental United States and Hawaii, providing exceptional security officers to regional government and commercial facilities. Akal is nationally recognized for delivering excellent, custom-designed security programs that surpass contract requirements and meet each client's unique needs.

Recognizing that the well-trained and fully prepared security officer is the key to successful contract performance, our comprehensive and innovative training programs are the foundation of our service. Our exceptional training and customizable curriculum have earned numerous commendations from our clients, as well as federal, state, and local law-enforcement agencies.

Akal's founders continue to guide the company by working closely with our clients, employees, and surrounding communities. Our commitment to *Exceptional Service Partnership* is long term and unlimited, strengthening our clients' organizations, which they serve. Akal Security is a wholly U.S.-owned and -operated, privately held New Mexico corporation.

1.0 GENERAL POLICIES

1.1.0 MISSION, VISION, AND VALUES

Akal Security is in its third decade of providing the highest quality of security guard services to a wide variety of clients, including private customers and government agencies at all levels. Akal has continued to grow and succeed by hiring competent and conscientious people and providing training and assistance, so they could develop within their areas of expertise and progress to higher levels of responsibility.

When you were hired by Akal Security, you entered into an important professional relationship, with a commitment to honor your job responsibilities while Akal honors your contributions to the company. By understanding Akal's mission, vision, and values, you will be taking the first step in participating in the successful building and maintaining of working relationships with Akal clients, your co-workers, the general community in which you live and work, and others with whom you interact.

1.1.1 Mission

Akal's mission is two-fold:

1. To be a global leader in the security industry; and
2. To be a trusted partner to our clients, our employees, our communities and our nation.

1.1.2 Vision

Vision, of course, refers to the faculty or state of seeing. By seeing ahead, you anticipate that which you will encounter and which will affect you. In the business sense, vision defines the direction in which the company is headed and the approach it will take.

Akal's vision is also two-fold:

1. We will be a leader in the growth of global security and support services; and
2. We will strengthen our nation and the world by serving government agencies and businesses with integrity and value.

1.1.3 Values

Values are the foundation of how we approach our work and achieve the corporate mission and vision. Integrity and accountability are at the core of Akal's values. This is the standard by which Akal Security holds its employees.

- **We provide outstanding service**

We deliver the highest quality services possible and strive to achieve excellence. We will accept no less. We are a full partner to our clients, helping them achieve their goals.

- **We act with integrity and honesty**

Our actions always reflect our values. We fulfill all our commitments. We always comply with contract and law. We communicate and report accurately and openly. We do not tolerate misconduct.

- **We are responsible and accountable**

We take full responsibility for our work. We involve others in decisions that affect them. We are accountable for our financial results, and protect the company's assets and fair profits.

- **We respect and care about each other**

We treat everyone with dignity and courtesy. We respect the values, cultures and beliefs of others. We promote the health and safety of our employees. We are committed to employees' professional development. We value and support employees who contribute to the success of the company.

1.2.0 EQUAL EMPLOYMENT OPPORTUNITY

Akal Security is an equal employment opportunity (EEO) employer, which means that it abides by all current, state and federal EEO laws prohibiting job discrimination. The U.S. Equal Employment Opportunity Commission (EEOC) enforces all federal EEO laws. The New Mexico Human Rights Division enforces employment discrimination laws at the state level.

1.2.1 Company's Commitment

Akal Security's commitment to EEO applies to all persons involved in the operations and administration of Akal Security and prohibits unlawful discrimination by any employee of Akal Security, including supervisors and co-workers.

Akal Security makes employment decisions on the basis of merit. Akal Security will not discriminate in employment and will take affirmative action to ensure that unlawful discrimination does not occur on the basis of race, color, sex, age, religion, national origin, sexual orientation, physical or mental disability, veteran's status, or any other status protected by state or federal law. All such discrimination is unlawful. Retaliation against employees or prospective employees reporting discrimination is strictly prohibited.

1.2.2 Employment Decisions

All employment decisions will further EEO principles. Akal Security will take affirmative action in all job classifications to recruit, hire, train, and promote employees in all job classifications without regard to race, color, sex, age, religion, national origin, sexual orientation, physical or mental disability, or veteran's status, except where such status is a bona fide occupational qualification.

Akal Security will ensure that job-promotion decisions are in accordance with EEO principles, by imposing only valid requirements for promotional opportunities and that all personnel actions, such as compensation, benefits, transfers, layoffs, return from layoffs, education, Akal Security-sponsored training, tuition assistance, and social and recreational programs, will be administered without regard to race, color, sex, age, religion, national origin, sexual orientation, physical or mental disability, veteran's status, or any other status protected by state or federal law.

As an affirmative action to EEO policy, Akal Security actively seeks members of ethnic minority groups, women, veterans, and persons with mental or physical disabilities for management, talent, engineering jobs, and other areas of employment. Akal Security plans to achieve this goal through the use of accurate job descriptions and widespread recruitment methods. To this end, Akal Security employs a variety of affirmative action supplements to its policy. Akal Security's Affirmative Action Plan is on file in the Personnel department.

1.2.3 Reasonable Accommodation

To ensure equal employment opportunities to qualified individuals with disabilities, Akal Security will make reasonable accommodations that will enable an otherwise qualified applicant or employee with a physical or mental disability to perform the essential functions of a position, unless undue hardship for Akal Security will result. Any qualified applicant or employee, who has a disability that prevents him or her from performing one or more of the

essential functions of the job, should contact the supervisor or the Human Resources department to request an accommodation. A request for accommodation need not take any particular form; it is sufficient if the employee informs Akal Security of the disability and requests some modification or assistance.

Once a request for reasonable accommodation has been made, Akal Security will work with the individual to identify barriers that make it difficult for the applicant or the employee to perform the job. Akal Security will cooperate with the applicant or employee to identify reasonable accommodations, if any, that will help eliminate the job limitation. If the accommodation is reasonable and will not impose an undue hardship, Akal Security will implement the accommodation. Akal Security may also propose alternative accommodations.

1.2.4 Incident Reporting

If you believe you have been subjected to any form of unlawful discrimination, or if you are aware of an incident of discrimination involving another employee, contact your supervisor or the Human Resources department. The report should be specific and should include the names of the individuals involved and the names of any witnesses. Akal Security will undertake an investigation in a timely manner and attempt to resolve the situation. If it is determined following the investigation that unlawful discrimination has occurred, appropriate remedial action and/or corrective action, up to and including termination, will be taken promptly.

1.3.0 ANTI-HARASSMENT, ANTI-DISCRIMINATION, AND RETALIATION

In accordance with applicable law, Akal Security prohibits sexual harassment and harassment and discrimination based upon race, color, sex, age, religion, national origin, ethnicity, sexual orientation, physical or mental disability, veteran's status, or any other status protected by local, state, or federal law.

1.3.1 Company's Commitment

Akal Security is committed to taking all reasonable steps to prevent harassment and discrimination from occurring. Retaliation against employees or prospective employees, who in good faith report alleged harassment or discrimination, is strictly prohibited. It is the policy of Akal Security to provide employment, training, compensation levels, transfer or promotion opportunities, and all other aspects of employment without regard to race, color, sex, age, religion, national origin, ethnicity, sexual orientation, physical or mental disability, veteran's status, or any other status protected by local, state, or federal law.

Akal Security affirms to all employees that discrimination in the workplace by supervisors, managers, or other company personnel is not tolerated. Any form of harassment or discrimination of one individual by another that is rooted in the victim's race, color, sex, age, religion, national origin, ethnicity, sexual orientation, physical or mental disability, veteran's status is an offence against every employee in this organization and will not be tolerated, including acts of sexual harassment. Should any employee of Akal Security feel that unlawful harassment has occurred, he or she should promptly report such conduct, so Akal can undertake a proper and confidential investigation. Any and all information revealed during the course of such investigation will be disclosed on a "need to know basis" only.

1.3.2 Sexual Harassment

All Akal Security employees have the right to work in an environment free of unsolicited, offensive, or unwelcome sexual overtures. Sexual harassment is a violation of state and federal law and of Akal Security policy. Sexual harassment includes, but is not limited to, any offensive or unwelcome sexual advances, requests for sexual favors, and other verbal, visual, or physical conduct of a sexual nature to include the following:

- Demands to submit to sexual requests, accompanied by implied or overt promises of preferential treatment or threats concerning an individual's employment status;
- Verbal conduct such as epithets, derogatory comments, slurs, unwanted sexual advances, or sexually oriented verbal "kidding" or abuse;
- Physical conduct such as unwanted touching, blocking normal movement, or assault; and
- Visual harassment, such as sexually explicit or sexually derogatory posters, obscene gestures, cartoons, or drawings.

Akal strictly prohibits any of the previously described conduct made either explicitly or implicitly in connection with a term or condition of an individual's employment, where

- Submission or rejection of such conduct is used as the basis for employment decisions such as promotion and benefits affecting the individual;
- Such conduct has the purpose or effect of substantially interfering with an individual's work performance; or
- Such conduct creates an intimidating, hostile, or offensive working environment.

1.3.3 Pregnant Employees

Pregnant employees must be treated exactly the same as all other employees of Akal Security. Singling out a pregnant woman because she is pregnant is discrimination and will not be tolerated by Akal.

A pregnant woman is protected under both the Family Medical Leave Act and the Pregnancy Discrimination Act. Although a pregnant woman is considered to be temporarily disabled, she is still required to fulfill her essential job duties. Should the pregnant employee request reasonable accommodation, Akal will make every effort to fulfill the request under the terms of Akal's Reasonable Accommodation policy.

The pregnant employee and her doctor are the only individuals who may decide what is best for the pregnant employee. Akal Security will not inquire as to the pregnant employee's ability to perform her job simply because she's pregnant. If Akal Security has a fitness-for-duty standard that is applied to all employees, then that same standard should be applied for pregnant employees.

Any form of unequal treatment is harassment and is not tolerated by Akal Security. As such, any supervisor or manager found to be discriminating against a pregnant employee is subject to disciplinary action up to and including immediate termination of employment.

1.3.4 Employee's Responsibility

The employee's responsibility and obligation is either to confront the individual instigating the harassment and demand that he or she cease the harassing conduct or to immediately report the harassing conduct to the immediate supervisor or the Human Resources department. Any reported violation of this policy will receive prompt and appropriate attention. Any employee or prospective employee, who experiences harassment in the workplace or who is aware of the harassment of other employees or prospective employees, should immediately contact his or her supervisor or the Human Resources Department. Complaints should be made in writing, where possible. The complaint should include all known details, specifying dates, and potential witnesses, names of individuals involved or others who may be aware of relevant information.

1.3.5 Company's Responsibility

Akal will investigate all complaints alleging harassment and all instances potentially constituting harassment that come to Akal Security's attention by means other than formal complaints. When conducting an investigation, care will be taken to protect confidentiality, to the extent possible, while still enabling Akal Security to conduct a thorough and appropriate investigation.

Following an investigation, Akal Security will take prompt and appropriate corrective action to remedy any harassment. Employees found to have engaged in any type of harassing behavior are subject to discipline up to and including immediate termination of employment. Any Akal employee, including any supervisor or manager, who is found to have engaged in unlawful harassment, is subject to disciplinary action up to and including immediate termination of employment. In addition, any employee, who is aware that harassment or discrimination has taken place but took no action to stop it, may be held personally liable for monetary damages. Akal Security will not pay damages assessed personally against an employee for alleged harassment.

1.3.6 Retaliation

Efforts by co-workers or supervisors to retaliate against any employee for reporting suspected problems will not be tolerated. Akal Security encourages its employees to voice concerns about suspected problems or violations of company policy or the law to either their supervisor or to the Corporate Human Resources department. No employee shall be treated adversely in any manner for expressing concern about a problem or suspected violation of law, if they act in good faith. Supervisors shall respect the rights of all employees to express concerns about such matters and shall ensure that employees who do so are not treated adversely as a result. Efforts by co-employees or supervisors to retaliate against employees for reporting suspected problems will not be tolerated by Akal and will result in disciplinary action, up to and including immediate termination of employment. In addition, Akal will not tolerate efforts to discover the identity of employees who choose to anonymously report cases of suspected harassment.

1.4.0 AT-WILL EMPLOYMENT

Employment at Akal Security may be terminated for any or no reason, with or without cause or notice, any time by Akal Security or by the employee, except where prohibited by state law.

The policy of at-will employment may be revised, deleted, or superseded only by a written employment agreement, signed by the Chief Executive Officer of Akal Security, which expressly revises, modifies, deletes, or supersedes the policy of at-will employment. Unless the employee is covered by a written employment agreement or a collective bargaining agreement (CBA), this policy of at-will employment is the sole and entire agreement between the employee and Akal Security as to the duration of employment and the circumstances under which employment may be terminated.

1.4.1 Terms and Conditions

With the exception of at will, terms and conditions of employment with Akal Security may be modified at the sole discretion of Akal Security, with or without cause or notice at any time. No implied contract concerning any employment-related decision or term or condition of employment can be established by any other statement, conduct, policy, or practice. Examples of the types of terms and conditions or employment that are within the sole discretion of Akal Security include, but are not limited to, the following: promotions; demotions; transfers; hiring decisions; compensation; benefits; qualifications; discipline; layoffs or recalls; rules; hours and schedules; work assignments; production standards; job duties and responsibilities; subcontracting; reduction; cessation; or expansion of operations; sale or relocation; merger or consolidation of operations; determinations concerning the use of equipment, methods or facilities; or any other terms and conditions that Akal Security determines to be necessary for the safe, efficient, and economic operation of its business.

1.4.2 Existence of a Collective Bargaining Agreement (CBA)

It is important to emphasize the preeminent status of an existing enforce Collective Bargaining Agreement; it may take precedent over any other laws pertaining to contract employment conditions. Some states do not have at-will employment laws. In such cases, contracts are managed as applicable by governing law.

Akal honors CBAs to which it is a signatory party. Please refer all questions concerning Collective Bargaining Agreements to Akal's Corporate Human Resources Department through your chain of command.

1.5.0 CODE OF CONDUCT

Akal Security's commitment to outstanding service and partnership is what makes the company successful and well respected. The purpose of Akal Security's Code of Conduct is to guide each employee's decisions within the workplace.

1.5.1 Employee's Responsibilities

As an Akal Security employee, one of your responsibilities is to identify and address issues before they become serious problems. To assist you in this important responsibility, Akal has developed a comprehensive Code of Conduct:

- Act with respect towards co-workers, customers, and others at all times;
- Comply with the letter and spirit of all applicable U.S. laws and the laws of other countries, as required and as permitted by U.S. law;
- Comply with company policies and procedures, client contracts, and other binding company commitments;
- Compete in accordance with formal rules of procurement and ethical business practices;
- Neither give, offer, or accept a gift or gratuity that might be considered a bribe, kickback, inducement, or reward when interacting with a customer or government representative;
- Avoid conflicts of interest or even the appearance of a conflict of interest;
- Avoid any activity that would result in personal gain from company business opportunities, without prior approval;
- Keep accurate, complete, and timely company records and reports;
- Protect company assets, using them wisely for company or customer benefit;
- Protect company intellectual property and business-sensitive information;
- Avoid disclosing confidential information, as required by law, policy, or contract;
- Making no public statements on behalf of the company without prior approval;
- Report illegal or unethical conduct to management or the employee hotline.

1.5.2 Violations and Consequences

As an Akal employee, you have the responsibility to comply with every part of this code. You may ask questions and seek guidance to help you understand the code. You must report suspected violations of this Code of Conduct. Retaliation against an employee who comes forward to raise concerns will not be tolerated. Anyone who violates this code, including through neglect or intentional disregard will be subject to disciplinary action, including possible termination. The company may seek reimbursement from an employee for any losses or damages the company suffers due to the employee's noncompliance. Certain violations may also subject an employee to criminal prosecution or civil penalties.

1.6.0 CONFIDENTIALITY

All employees shall maintain strict confidentiality about all information encountered while employed by Akal Security, on company property, and at a client's place of business. To ensure strict confidentiality, employees may discuss only those matters that pertain to the performance of their employment duties.

Employees may not engage in communication with but not limited to Akal clients, the media, or competitors, about any Akal business practices.

Any employee who releases information regarding Akal Security's or a client's business practices, without written authorization, will be subject to disciplinary action up to and including immediate termination of employment.

Employees must refer all requests for information to the appropriate department of Akal Security's Corporate Headquarters. When unsure about the appropriate department, the employee should contact Akal Security's Corporate Human Resources department.

1.7.0 CONFLICT OF INTEREST

To protect the integrity of company information, products, services, and employee efforts and to reduce the risk of litigation, all employees are required to abide by Akal Security policies and specific contract requirements pertaining to conflict of interest.

1.7.1 Guidelines for Full Disclosure

Employees are expected to devote their best efforts to the interests of Akal Security and the conduct of its affairs. Akal Security recognizes the right of employees to engage in activities outside of their employment with Akal Security, that is, activities that are of a private nature and unrelated to company business. However, a policy of full disclosure must be followed, to assess and prevent potential conflicts of interest from arising. Describing all circumstances and conditions that might develop is impossible; therefore, employees must comply with the following guidelines:

- Employees have an obligation to devote their full working time to employment with Akal security and may not engage in any outside professional work without full disclosure their supervisor;
- Employees shall not engage in outside work that will interfere with his or her primary job with Akal Security;
- If an employee, spouse, or other member of an employee's immediate family is engaged in a business similar in nature to Akal security, that business association must be disclosed in full to the employee's supervisor;
- Employees shall not engage in any activity of a nature that is in some way hostile or adverse to the business of Akal Security;
- Employees shall not accept a retainer, commission, consulting fee, or any other fee arrangement or remuneration without full disclosure to their supervisor;
- No employee or member of his or her immediate family may directly or indirectly borrow from, lend to, invest in, or engage in any substantial financial transaction with a potential customer, client, or supplier; and
- Employees shall not perform any outside work during regular office hours, and no company facilities, equipment, labor, or supplies are to be used to conduct any outside activity.

1.7.2 Performing Outside Work

Employees performing outside work are under strict obligation to advise their clients that the work is in no way by, for, or in the name of Akal Security. Any questions regarding outside work or a possible conflict of interest should be discussed with the immediate supervisor. Failure to disclose or discuss information related to any of the above points may lead to disciplinary action up to and including immediate termination of employment.

1.8.0 WORK RULES FOR SECURITY PERSONNEL

For Akal Security to remain successful within the security guard industry, as well as ensuring a consistently cooperative, respectful environment for all employees, it is necessary to implement and enforce a set of reasonable guidelines for the workplace. We call these guidelines “General Expectations” because they help to maintain a positive environment within which employees can reasonably expect to work:

- No consumption of alcoholic beverages within an eight-hour period prior to reporting for duty or while on duty.
- No use of controlled substances (drugs), except with a doctor’s prescription.
- No sleeping while on duty.
- No theft of any nature.
- No personal cell phones or telephone calls while on duty, except in a verifiable emergency.
- No use of unnecessary force or mishandling of weapons.
- No carrying or use of any weapon not issued by Akal Security or by the client with Akal’s approval while on duty; this includes firearms, batons, mace, pepper spray, sap gloves, and slappers, or blackjacks.
- No harassment or discrimination against any other employee for any reason.
- No personal reading material at the duty post while on duty.
- No use of personal televisions, radios, MP3 players, PDAs, iPods, games, or any other electronic entertainment devices.
- No fraternizing of any kind while on duty.
- No employee may initiate contact with Akal Security clients or act as notifying agents regarding incidents or accidents without supervisory approval.
- No employee will unnecessarily display weapons for any reason.
- No employee will knowingly make false statements or reports.
- All unusual activities, no matter how small, must be reported to a supervisor.
- All permits and contractually required equipment (guard cards, weapons, baton, mace, etc.) must be on the employee’s person while on duty.
- All employees must report to their posts as scheduled, after any required gear-up procedures, and must remain until the end of the shift, unless properly relieved.
- All employees must fully participate in any company-required investigations.
- All employees must notify the supervisor on duty at least four hours prior to shift work when calling off sick.
- All employees must attend and complete scheduled training sessions.

- All employees must report any payroll issues to their supervisor as soon as they are aware of them.
- All employees will perform only company-required work while on duty.
- All employees must report to their supervisor any time a physician has prescribed medications that may affect the employee's ability to perform his or her job
- All employees must abide by Akal Security's required timekeeping procedures.

1.9.0 NEGLIGENCE

Inappropriate actions on the part of any Akal Security employee may be considered as negligence and will not be tolerated. An act of negligence is defined as any unreasonable action taken by an employee that could or does result in any of the following:

- Loss of life
- Injury
- Property damage
- Loss or damage to business or reputation
- Failure to perform assigned job duties
- Failure to complete assigned duties in a timely manner
- Failure to report for work

As allowed by all applicable laws, Akal Security will seek restitution for all property or equipment damage caused by employee negligence. Proven negligence will result in disciplinary action up to and including immediate termination of employment.

1.10.0 TIMEKEEPING

It is the responsibility of every Akal Security employee to accurately record all time worked. Federal and state law requires Akal to keep an accurate record of time worked in order to calculate employee pay and benefits. "Time worked" is defined as all the time actually spent on the job performing assigned duties, including gear-up and gear-down activities. Timekeeping is the basis for accurately and properly paying employees. Failure to comply with this policy, in part or whole, will lead to disciplinary action, up to and including termination.

1.10.1 Hourly Employees

Hourly employees will accurately record their time to the minute. Rounding of greater than one minute is not accepted. Employees must sign-in at the actual start time of their shift and sign-out at the actual end time of their shift. They must also record the beginning and ending time of any split shift, unpaid break, or departure from work for personal reasons. Hourly employees will perform no duties prior to signing in for their scheduled shift nor will they be allowed to perform duties after signing out.

Should an hourly employee need to perform work prior to the scheduled start time or beyond the scheduled end time of the shift, he or she must obtain the supervisor's approval and record the altered time accordingly. Any work above and beyond an employee's scheduled work times must always be approved by the Supervisor before it is performed. Failure to obtain prior approval from a Supervisor may result in disciplinary action.

1.10.2 Legibility of Timesheets

All entries on a handwritten timesheet must be neat and clear. Illegible entries must be appropriately corrected. Repeated occurrences of illegible entries may result in disciplinary action.

1.10.3 Accuracy of Timesheets

It is the employee's responsibility to certify by signature the accuracy of his or her recorded time. The supervisor will review and then initial the time record before submitting it to Payroll. If corrections or modifications are made to the time record, the supervisor must verify the accuracy of the changes by initialing the time record.

It is forbidden for any employee to

- Alter, falsify, or tamper with a time record;
- Create a false time record;
- Record shift start time before actually commencing work;
- Record shift end time that does not match actual shift end time; or
- Record time on another employee's timesheet.

1.11.0 PREVENTING WORKPLACE VIOLENCE

The safety and security of all Akal employees are of vital importance. Therefore, Akal Security prohibits any form of workplace violence. Acts or threats of physical violence that involve or affect Akal Security or occur on Akal Security property will not be tolerated. Violations of this policy by any individual will lead to corrective action up to and including immediate termination, and legal action as appropriate.

1.11.1 Definition of Workplace Violence

Workplace violence is any intentional conduct that is sufficiently severe, offensive, or intimidating to cause an individual to reasonably fear for his or her personal safety or the safety of his or her family, friends, and/or property, such that employment conditions are altered, or a hostile, abusive, or intimidating work environment is created for one or more Akal Security employees.

1.11.2 Acts of Violence

Acts of violence include, but are not limited to, the following:

- Intimidation
- Harassment
- Coercion

1.11.3 Persons Affected by Prohibition of Violence

This prohibition against threats and acts of violence applies to all persons involved in the operations of Akal Security:

- Akal Security employees
- Contract workers
- Temporary workers
- All individuals on Akal Security property

1.11.4 Employee Response to Violence

Employees who believe threats or actions of violence have been made against them or others should report the details of such incidents to their supervisor or a representative of the Human Resources department as soon as possible. All reported incidents of violence and threats of violence will be investigated.

1.11.5 Company Response to Violence

Any person who engages in a threat or violent action while working for Akal Security or on Akal Security property may be removed from the premises as quickly as safety permits and may be required to remain off Akal Security premises at Akal Security's discretion, pending the outcome of the investigation into the incident.

Once a threat has been substantiated, it is Akal Security's policy to put the threat maker on notice that he or she will be held accountable for his or her actions and then follow through with the implementation of a decisive and appropriate response. When the threats are made or acts of violence are committed by an Akal Security employee, a judgment will be made by Akal Security as to what actions are appropriate, including possible medical evaluation and/or disciplinary action up to and including immediate termination of employment.

1.12.0 DRUGS AND ALCOHOL

Akal Security is committed to maintaining a safe and productive working environment. The use or abuse of alcoholic beverages, controlled substances, inhalants, prescription drugs and over-the-counter medications, and the illegal use of drugs can impair performance, jeopardize safety, and expose Akal Security to the risk of injury, property loss, and damage.

1.12.1 Environment Free of Drugs and Alcohol

It is the policy of Akal Security to keep the work environment free from these substances and their adverse effects on job performance and safety. The company reserves the right to screen any employee suspected of violating this policy.

Akal Security employees are prohibited from reporting for work or working while impaired by controlled substances, drugs or inhalants, or while under the influence of alcohol. The possession, consumption, distribution, exchange, delivery, dispensation, sale, or use of alcoholic beverages, controlled substances, inhalants, or the illegal use of drugs is prohibited on company property, in company vehicles, in personal vehicles used for business purposes, or while employees are engaged in company business.

1.12.2 Prescription and Over-the-Counter Medications

The normal use of over-the-counter medications and the legal use of prescription drugs, as ordered by a physician, are not prohibited, providing such medication does not interfere with the individual's ability to perform his or her job. Employees taking over-the-counter medications or prescription drugs must inform their immediate supervisor before commencing work, if their doctor or pharmacist indicates that the medication may impair work abilities or physical/mental faculties or if the employee has knowledge that the medications may create such problems. Akal Security supervisors will make the determination regarding whether employees can work while taking any medications.

Employees taking over-the-counter medications or prescription drugs must have the medication in the original container, which identifies the drug, dosage, prescription date, and prescribing physician. All employees must observe proper restrictions on the use of over-the-counter medications and prescription drugs.

1.12.3 Drug Testing

Akal Security reserves the right to conduct a drug test under the following conditions:

- If an employee is injured while on the job
- If there is reasonable suspicion of intoxication
- If an employee has been in an accident that causes bodily injury or damage to Akal Security property.

1.13.0 LEAVE OF ABSENCE

Akal Security shall grant leaves of absence to all eligible employees on a nondiscriminatory basis in accordance with federal and state law, as well as Akal Security's own policy. This policy applies to regular, full-time employees working at least 32 hours per week, unless otherwise specified on a specific contract. Location managers should consult with the Corporate Human Resources director about any concerns or questions regarding statutory compliance with Akal Security's leave policies for particular sites and operations.

1.13.1 Three Types of Leaves of Absence

Akal recognizes three types of leaves of absence:

1. Family/medical leave (FML)
2. Personal leave
3. Unpaid leave of absence (statutory and non-statutory)

1.13.2 Definitions

The following definitions are related to leaves of absences:

- **Child.** Biological, adopted, or foster child; stepchild; legal ward; or child of a person acting as a parent, who is either under 18 years of age or 18 years of age or older and incapable of self-care because of a mental or physical disability.
- **Healthcare provider.** Doctor of medicine or osteopathy; chiropractor; clinical psychologist; dentist; optometrist; podiatrist; nurse practitioner; nurse midwife; and Christian Science practitioner.
- **Key employees.** Salaried employees among the highest-paid 10 percent of employees within 75 miles of the branch facility.
- **Personal leave.** Employee requested leave of 5 consecutive business days or less.
- **Leave of absence.** Excused absence with or without pay.
- **Leave of absence without pay.** Excused absence without pay beyond five working days.
- **Statutory leave of absence.** Required by federal or state law, such as military leave and jury duty.
- **Non-statutory leave of absence.** Leave that is not required by federal or state law, often used for serious health condition; also, illness, injury, or physical or mental condition that includes the following:
 - (a) Any period of incapacity or treatment associated with or subsequent to in-patient care (overnight stay) in a hospital, hospice, or residential medical care facility;

- (b) Any period of incapacity requiring absence from work, school, or other regular daily activities of more than three calendar days that also involves continuing treatment by (or under supervision of) a healthcare provider; or
- (c) Continuing treatment by (or under supervision of) a healthcare provider for a chronic or long-term health condition that is incurable or so serious that, if not treated, would likely result in period of incapacity of more than three consecutive calendar days in the absence of medical intervention or treatment, such as cancer requiring chemotherapy, radiation, etc.; severe arthritis, physical therapy; and kidney disease, dialysis.

1.13.3 Family and Medical Leave Act (FMLA)

Refer to following section on FMLA.

1.13.4 Statutory Leave of Absence: Unpaid

By law, Akal Security must grant leaves of absence for employees who are required to satisfy civic obligations, such as jury duty, or the following military service obligations:

- Drafted service into the armed forces;
- Volunteer service in the armed forces;
- Service in military reserves or National Guard;
- Any category of service designated by the U.S. president in time of war or emergency; or
- Active duty or training, period physical fitness examinations, or other obligations.

In most cases, such leaves are unpaid and carefully prescribed by state or federal statutes.

The federal Uniformed Services Employment and Reemployment Rights Act (USERRA) is the primary statute that protects uniformed service persons from employment discrimination based on their military status. USERRA provides discrimination protection, reemployment rights, and benefits to uniformed service persons who have completed service to their country under honorable conditions and who wish to return to employment.

Uniformed Services Employment and Reemployment Rights Act (USERRA)**Obligations of the employee requesting military leave:**

- Unless impossible to provide notice, the employee must give advance written or oral notice of leave. The employer shall not insist on knowing exact date of employee's return to work but can ask the employee to provide approximate dates of the leave.
- In addition to notice, the cumulative length of the leave and all prior absences from employment for military service must not exceed five years.
- The employee must make a timely application for reemployment to obtain the protections under the USERRA. Failure to report to work will subject the service person to the employer's normal personnel policies but does not automatically cause forfeiture of rights under the USERRA.

Obligations of the employer to restore the employee's job upon returning from military leave:

- Type of position and benefits are dependent upon the length of the employee's absence and the employee's level of training in a particular position.
- The employer is expected to make reasonable efforts to train the employee to perform the duties of that job, if he or she is unable to immediately perform such duties.
- If military service exceeded 180 days, the employee cannot be terminated without just cause for one year after returning to work.
- If military service exceeded 30 days but did not exceed 180 days, the employer may not terminate, except for cause, within 180 days of the employee's reemployment.

The employer is not required to pay the employee who is on military leave:

Some employers continue pay during short periods of military service, often providing the difference between the employee's regular salary and military pay.

The employer must protect health insurance, vacation, and pension benefits:

- The employer is required to offer continued, group health coverage for up to 18 months of service at the employee's expense, except if the employee is on leave for 31 days or less, in which case the employee may not be charged more than the amount he or she would have paid if still actively working.
- The employer cannot force the employee to use vacation leave while on military leave.
- No break in employment is considered to have occurred because of military service; no forfeiture of benefits already accrued is allowed; and there is no need for an employee to requalify for participation in pension plans.

An employer may request proof of need of such leave, in the form of legal or military service documents, but employees may not be denied such leave under most circumstances. The Location manager, who is given military or civic requests for leave, must contact the Corporate Human Resources director immediately to review the request and to ensure legal compliance.

Reinstatement

Akal Security is entitled to fill job positions of employees on leave, if necessary, to maintain regular operations. Approval for military leave and reinstatement from such leave will be given in compliance with all applicable laws. Company benefits will continue during a military leave, as provided by law. Employees requesting military leave will be required to provide a copy of their written military orders to Akal Security. The employee's supervisor may call to confirm verbal orders.

1.13.5 Non-statutory Leave of Absence: Unpaid

An unpaid leave of absence may be granted by the Location manager (with approval from the Corporate Human Resources department) for the purpose of enabling an employee to receive extended time away from work to address compelling personal business not covered by statutory law, including incidences that may be covered by FML but the employee is not eligible for FML. This policy applies to regular full-time employees who have completed the initial entry period, except those covered by a collective bargaining agreement.

This leave status will remain in effect for no more than a total of 12 weeks from day 1 of employee's leave. If the employee is unable to return to work at the end of this 12-week period, a voluntary separation will be put into effect, and employment will be terminated.

An absence involving paid time off—such as workers' compensation leave, sick leave, or any paid time off specified by an employment agreement—is not considered a leave of absence, nor is personal time off up to five days.

Procedure

Request for leave of absence or a leave extension must be submitted on an Employee Leave Request form (HRG F3.51a) to the Location manager two weeks prior to the commencement date, except when emergency conditions make such requirement impossible. The Location manager or Corporate Human Resources department may request certification of need for time off. If the Location manager approves the request, it must be submitted for final approval by the Human Resources director before unpaid leave may begin. Extensions are ordinarily not granted but, in some critical cases, may be granted. No extension may be granted beyond 120 days without the approval of the Human Resource director.

Benefits

No loss of service credit with Akal Security will occur as a result of the leave of absence, but no benefit credit will accrue toward vacation and sick leave entitlement for the duration of the leave. Any accrued paid vacation or sick/personal time will be used before unpaid leave is taken. The substitution of paid leave time for unpaid leave time does not extend beyond the 12-week leave period. If the employee is using vacation or sick leave time during the leave of absence, any employee contributions to health insurance premiums, such as dependent coverage,

will continue to be paid through payroll deductions. Once this accrued benefit time is exhausted and the employee is on an unpaid leave of absence, the employee will be responsible for the employee's portion of the premiums at the level of previous payroll deductions.

After 30 consecutive days of unpaid leave of absence, the employee will be responsible for paying the full cost of personal, group health insurance coverage and that of dependents.

Group health insurance coverage will stop after the 30-day period, unless the employee elects to continue insurance benefits through COBRA coverage, where the employee pays the full cost of coverage. Contact the Corporate benefits administrator for information on COBRA coverage: (888) 325-2527, ext. 6689.

Reinstatement

Upon return from unpaid leave of absence, the employee will be reinstated to the prior position, if available. The employee returning from leave is not guaranteed reinstatement from an unpaid leave of absence or placement in the prior or alternate job position:

1. If the employee's prior position is unavailable, the employee will be assigned to a comparable position for which he or she is qualified, if available.
2. If a comparable position is unavailable, the employee will be reinstated in a lesser position for which he or she is qualified.
3. If the employee accepts an alternate position offered by Akal Security, he or she will be subject to the compensation, benefits, and work schedule for that position.
4. If no alternate positions are vacant for which an employee is qualified at the time he or she seeks reinstatement, or if the employee is not selected for an alternate position or refuses the first position offered by Akal Security, he or she will be dismissed from employment. However, such employees are eligible to apply for future employment by submitting an application to Akal Security.

Note: California employers are required to reinstate employees returning from a pregnancy-related disability of up to 120 days, provided the disability was medically necessary.

Return notification

The employee on leave of absence must notify his or her supervisor at least two weeks prior to the end of the leave, to state his or her availability for return to work. An employee's failure to return from leave of absence, or failure to contact his or her supervisor or the Human Resources director within three days after the scheduled date of return, will be considered a voluntary resignation.

1.14.0 FAMILY AND MEDICAL LEAVE

The federal Family and Medical Leave Act (FMLA) of 1993 allows employees to take or be designated to take an extended period of leave for a certain medical or family situation, providing them greater flexibility in balancing the demands of their work and personal lives. Employees may be granted additional leave rights under state law as applicable. Please contact your supervisor for information.

Akal Security's policies and procedures for granting FMLA leave are consistent with the FMLA of 1993:

1.14.1 Basic Eligibility Criteria for FMLA Leave

An employee seeing to take FMLA leave must

- Have been employed for one year and worked at least 1,250 hours during the preceding 12 months; and
- Work at a location where there are at least 50 employees within a 75-mile radius.

An eligible employee may take up to 12 weeks of FMLA leave in any rolling, 12-month period.

Once deemed eligible for FMLA leave, the employee may take such leave for any of the following reasons:

- Birth or adoption of a child;
- Care of a spouse, child, or parent with a serious health condition; or
- Receiving of care when the employee is unable to work because of his or her own health condition.

1.14.2 Limitations for FMLA Leave

Eligible employees enjoy flexibility within their plans to use FMLA leave, with the following limitations:

- Child-care leave must be completed within 12 months of the birth, adoption, or placement of the child and can only be taken in a continuous time period; and
- Eligible spouses, who both work for Akal Security, are limited to a total of 12 weeks of leave between them for a birth, adoption, or placement of a child or the care of a parent with a serious health condition.

1.14.3 Maintenance of Group Health Insurance

Akal Security will maintain the employee's group health insurance coverage on the same terms as if the employee had continued to work for up to a maximum of 12 work weeks per 12-month period during FMLA leave, if such insurance was provided before the leave began.

1.14.4 Reinstatement to Previous Job after FMLA Leave

Under most circumstances, upon return from FMLA leave the employee will be reinstated to the job position held at the time the FMLA leave commenced or to an equivalent position

with equivalent pay, benefits, and other employment terms and conditions. At the same time, it is important to note that an employee has no greater right to reinstatement than had the employee been continuously employed rather than on leave.

1.14.5 Flexibility in Manner of Taking FMLA Leave

When required by a health-care practitioner, FMLA leave for a serious health condition of the employee or a family member may be taken for a continuous time period, for intermittent time periods, or through a reduced work schedule.

Leave of Absence Summary Chart (Except California)				
Type of Leave	Reasons for Leave	Eligible Employees	Documentation Required to Initiate Leave	Documentation Required to Return from Leave
FMLA for up to 12 weeks of unpaid leave of absence in any 12-month period. Return to same or equivalent position, if qualified and there has been no applicable reduction in force.	To care for a newborn child, or for adoption or foster child placement; to care for a sick family member or personal illness, if FML eligibility requirements are met.	All full-time, regular employees employed 1 year and have worked at least 1,250 hours in preceding 12 months. Must be employed by an operation (branch) with a minimum of 50 employees in a 75-mile radius from branch location.	30-days' advance notice, if possible, with Employee Leave Request (Medical certification and second opinion may be required.) Proof of birth and/or adoption/ placement within 15 days of event.	Medical release to return to work.
Personal Leave for up to five days of unpaid leave.	Compelling personal business not covered by FML (legal affairs, funeral, child's doctor's appointment, or school visit).	All regular full-time employees after initial entry period has been completed.	Immediate notice to Supervisor, if known in advance; completed required form; approval of Location manager and supervisor.	Employee notifies supervisor, and supervisor notifies Location manager.
Unpaid Leave of Absence Statutory and Non-Statutory for more than five days of extended leave.	<u>Statutory</u> : Reserve/National Guard annual training; military, civic, jury duty <u>Non-Statutory</u> : compelling medical or personal or reason.	All regular full-time employees after initial entry period has been completed, if FMLA leave does not apply.	Two-weeks' prior notice, if possible, with Employee Leave Request. Approval from the Corporate HR Dept. COBRA coverage started, if applicable.	Employee notifies supervisor or Location manager; Location Manager notifies HR director.

1.15.0 PERSONNEL RECORDS AND PRIVACY

Akal Security has established standards by which information contained in personnel records will be managed to achieve accuracy, privacy, and legal compliance. These policies also describe the Company's policies regarding privacy of employee's person and property. For specific contracts, refer to CBA guidelines pertaining to that contract.

1.15.1 Access to Personnel Files

Access to personnel files is restricted to authorized Location administrative employees on a need-to-know basis. Inspection of an employee's personnel file may be accomplished at reasonable times during office hours under the following conditions:

- **Employee request.** Employees may request a copy of certain contents contained in their employee file for use in connection with their employment with the Company. The request should be in writing and include the reasons for requesting the copy. The written request is intended to protect Akal, should the employee not safeguard the copied material. The employee may inspect his or her personnel file in the presence of the Location manager, operations manager, or office manager within the personnel records area. Notes of legal or disciplinary investigations in progress, if any, will be removed before the employee views the file. The Human Resources department *must* be contacted prior to employee viewing of personnel file. (Contact the Human Resources department for specific filing guidelines).
- **Government inquiries.** Akal Security will cooperate with federal, state, and local government agencies investigating an employee, if the investigators furnish proper identification and proof of legal authority to investigate. The Human Resources department must be notified immediately of any subpoena or governmental requests presented to the Location office. A government investigator may be permitted to review a personnel file on Akal Security premises, with consent from the Human Resources department. The investigator will not be allowed to remove or reproduce personnel file information without consent from the Human Resources department.
- **Legal inquiries.** The Human Resources department must be notified immediately of any subpoena or legal requests presented to the Location office. An authorized investigator may be permitted to review a personnel file on Akal Security premises, with consent from the Human Resources department. The investigator will not be allowed to remove or reproduce personnel file information without consent from the Human Resources department. CT Corporation is Akal Security's registered agent for service. Locations are asked not to accept service or lawsuits and to refer the serving agent to CT Corporation.
- **Salary access.** An employee's salary is confidential, and access to it is generally limited to the employee, Location manager, and Corporate Office. An individual requesting salary information (other than those listed above) must request the information in writing from the Human Resources department, indicating reason for access, scope of access, and how long access is needed. Authorization must be approved by the Human Resources department. Salary information will not be

released unless authorization is in the requester's file and the requester has a business need to know.

- **Telephone number and address.** It is Akal Security's policy not to release an employee's personal telephone number and address to anyone without prior employee approval.

1.15.2 Employment Verification and Neutral Reference

Persons requesting employment verification or other employee information must be directed to request this information by submitting a fax or letter request to the Human Resources department. Supervisors and other employees are prohibited from providing personal or employment references on any former or current employees. Information will be verified by the Human Resources department but will be limited to dates of hire and separation and most recent job title. Salary information may be verified for financial institutions requesting verification for employee credit references.

1.15.3 File Retention and Maintenance

Personnel records will be maintained by the local office for a period of three years after an employee's separation date. Employment applications of individuals not hired will be retained for three years. Legal and other important correspondence should be retained permanently. Refer to the following table for a complete guide to retention of business records. When the retention period ends, contact the Human Resources department for final disposition of records. For terminated employees, compile all documentation for the employee, and store with the inactive files. Note: Do not commingle file types.

Business Records: Complete Guide to Record Retention		
Keep Permanently	<ul style="list-style-type: none">▪ Accident reports, claims, and policies still pending▪ Accountant's audit reports▪ Cash books, charts of accounts▪ Cancelled checks for important payments▪ Contracts/leases still in effect▪ Bills of sale▪ Deeds	<ul style="list-style-type: none">▪ Depreciation schedules▪ Financial statements (end of year)▪ General ledgers▪ Insurance records▪ Journals▪ Legal/important correspondence▪ Minutes of meetings▪ Property appraisals/records
Keep 1 Year	<ul style="list-style-type: none">▪ Bank reconciliations▪ Correspondence with vendors or customers▪ Duplicate deposit slips	<ul style="list-style-type: none">▪ Purchase orders▪ Receiving sheets▪ Requisitions▪ Stockroom withdrawal forms
Keep 3 Years	<ul style="list-style-type: none">▪ General correspondence▪ Employee personnel records (after termination)▪ Employment applications▪ Expired insurance policies	<ul style="list-style-type: none">▪ Internal audit reports▪ Internal reports▪ Petty cash vouchers▪ Physical inventory tags▪ Savings bond registration records

Business Records: Complete Guide to Record Retention		
Keep 7 Years	<ul style="list-style-type: none"> ▪ Accident reports and claims ▪ Accounts payable records ▪ Accounts receivable records ▪ Cancelled checks ▪ Expense analysis and distribution schedules ▪ Expired contracts/leases ▪ Expired option records ▪ Inventories of materials/supplies 	<ul style="list-style-type: none"> ▪ Invoices to customers ▪ Notes receivables records ▪ Payroll records/summaries ▪ Plant cost ledgers ▪ Purchase order copies ▪ Sales records ▪ Subsidiary ledgers ▪ Time books ▪ Voucher records

1.15.4 Personnel File Maintenance

Personnel files will be maintained in an orderly fashion, using the Employee File Checklist, which serves as a cover sheet for file sections (see below). Personnel records will be audited locally at least annually and by the Corporate office annually.

Akal Security personnel files are divided into seven sections within four primary, color-coded category files, as follows:

- **Employee file.** Sections 1 through 4 are filed in a 4-section, Manila, classification folder.
- **Confidential file.** Section 5 (red folder) contains investigations, criminal background results, and items that would not otherwise go into an employee file.
- **Medical file.** Section 6 (green folder) contains items pertaining to an employee's health or medical history, including medical waivers, physical exams, etc.
- **Contract file.** Section 7 (blue folder) contains contract-specific certifications, document, training, etc. Generally, it is required for larger contracts. Section 7 cover sheet is customized by the Corporate Start-Up Team at time of contract start-up.

Each section will have a cover sheet, and all corresponding documents will be fastened behind the cover sheet using two-hole punch fasteners (contact the Human Resources department for more-specific filing instructions).

1.15.5 Confidential Files

All personnel data will be maintained in the personnel file, except employee medical records, workers' compensation records, and sexual harassment and/or confidential investigations. These records must be maintained in confidential files separate from personnel files, with access limited to Location managers and corporate officers who have a need to access these files.

- **Background checks.** These include moving violation records, criminal background checks, and others.
- **Drug screen results.** These include all results of drug screenings.
- **Moving violation record.** These include vehicular citations and moving violations.

- **Investigations not yet resulting in disciplinary action.** These must not be included in the employee file. Once a disciplinary action has been approved, the result of the disciplinary action should then be placed into the personnel file.

1.15.6 Medical Files

All documents pertaining to an employee's medical condition will be maintained in a separate confidential file, including workers' compensation, medical questionnaires, Family/Medical Leave Act (FMLA) and medical leave requests, and health insurance claims information. Personnel medical files are subject to the following restrictions:

- **Medical information.** All medical information must be maintained in its own separate file. This includes medical questionnaires, workers' compensation claims, and other related forms.
- **Health plan enrollment forms** (not including the benefits package). These must be kept separate because they indicate age and marital status.
- **Access.** Location access to personnel medical files is restricted to the Location manager, and Location safety manager.
- **Release of information.** Medical information will be released only upon written authorization of the employee, under direction of the Corporate Human Resources department, or upon proper request from persons or agencies, who have legal rights to the information, with prior approval from the Corporate Human Resources department.

1.15.7 Separate files

For legal, security, and privacy purposes, certain records must be maintained in separate files. A "separate file" refers to a file kept separately from the three main categories listed above, i.e., Employee file, Confidential file, and Medical file. Separate files include, but are not limited to, form I-9s and applicant flow process and must be kept in a secure area and with limited access:

- **I-9 forms.** All I-9 forms (originals with signatures, not copies) must be kept in a separate (unless otherwise specified) three-ring binder. They should be filed alphabetically, with separate sections for former and current employees.
- **Applicant flow.** This includes information such as the Voluntary Survey and Veteran's Status form, which indicate age, marital status, handicap, religion, and national origin.

For any question concerning the contents and maintenance of separate files, contact the Human Resources department.

1.15.8 Privacy and Notice of Search Authority

Based upon reasonable suspicion, Akal Security reserves the right to conduct searches of its employees, employee computers, lockers, desks, Akal vehicles, and employee property. Refusal to permit such a search is considered a serious offense and could lead to disciplinary action up to and including termination.

Employees must be notified, during Orientation, of Akal Security's right to conduct searches in the manner described above. Employees will sign Akal Security's Search Authorization Agreement.

Note: The Location manager will ensure that a notice is posted at the local office, in a conspicuous location, to remind employees of this authority.

1.15.9 Polygraph and Lie Detector Tests

Akal does not require employees to submit to polygraph tests, unless it is part of an ongoing investigation into incidents where the following conditions exist:

- There was economic loss or injury to Akal Security's business;
- The employee to be tested had access to the property in question;
- Akal has a reasonable suspicion that a particular employee was involved; and
- There are no state, local, or contractual prohibitions against the use of such tests.

If a polygraph test is deemed to be required and legal, Akal Security Human Resources must be involved, and Akal Security managers must be closely involved in monitoring the test to ensure that it is administered by a competent polygraph examiner, who is aware of legal requirements. If the client requires the test, the client should bear the cost of the test.

Note: Before administering any polygraph tests, contact the Corporate Human Resources department.

1.15.10 Personal Property

Akal Security is not responsible for any employee's personal belongings being lost, destroyed, or stolen while on duty. Employees should leave personal valuables at home. Akal Security assumes no responsibility for damage to or loss of automobiles or other personal property while the employee is on duty.

1.16.0. MEDIA

Akal Security's Communication department maintains exclusive responsibility with the company to respond to questions from media outlets, provide background information to reporters, and arrange interviews with company executives. In this way, Akal Security is best able to provide answers to media representatives' questions in a manner that is most efficient, accurate, and timely.

1.16.1 Employees' Response to Media Representatives

Akal Security employees should not feel pressured to provide answers to media outlets, which include radio, and television, and the press (newspapers and magazines). If approached by representatives of any media outlet, maintain a standard of courtesy and respect, and direct all inquiries to the Corporate Communications department.

1.16.2 Akal Security's Media Spokesperson

Akal Security's media spokesperson is Daya Singh Khalsa, president. His direct phone number is 505.692.6622.

1.17.0 COMPUTER USE

If an employee's job entails using an Akal Security–owned computer or connecting to an Akal Security network, that employee is subject to the requirements of this policy, which covers applicable use and protection of personal computers (PCs), associated hardware, software, and networks. By accepting a system password, the employee accepts this policy.

1.17.1 For Official Use Only

Akal Security computers and networks are for official use only, to be used in the accomplishment of company tasks and requirements. The information technologies (IT) manager determines who is authorized to use computers and for what purposes. Computer users have an inherent responsibility to conduct proper operations in accordance with sound company practices, cognizant of related security policies, procedures, and features currently in effect. Only authorized personnel may use Akal Security computers.

1.17.2 Property of Akal Security

All documents, e-mails, and other data stored within company-owned computers are the property of Akal Security and are subject to monitor or review, at any time, by the employee's supervisor and IT department staff. Authorized personnel may override any applicable passwords or codes in accordance with the best interests of the company.

1.17.3 E-mail is Discoverable

E-mail is a legal, company document and is discoverable by law, as are other files and documents stored on your computer. Anything you write in an e-mail, through or to Lotus Notes[®], may be subpoenaed. Only include pertinent and relevant wording, statements, and dialogue in company-related e-mail you are willing and able to support in a court of law.

1.17.4 Privacy and Appropriate Use

Akal Security employees have no right to computer privacy. Network access is monitored for inappropriate use. Some examples of inappropriate computer use include chat rooms, online auctions, games, gambling, stock market viewing, terrorist plans, hate mail, hacker activities, sexually oriented e-mail or web sites, personals listings, or money-making schemes. Browsing, viewing, printing, downloading, or setting any of these materials as a screensaver on a company-owned computer is strictly prohibited. Bear in mind, that which is acceptable to one person may be offensive to another. Each employee is responsible for maintaining a respectable workplace for everyone. Broad-band Internet sites use excessive network bandwidth and will be scrutinized by the IT department on a case-by-case basis. Internet web sites that continually display updated information, such as news headlines, weather, sports, and stock quotes, are strongly discouraged; however, if required, the update interval must be set to a reasonable level, e.g., hourly. Additional policy requirements are as follows:

- Unauthorized review, duplication, dissemination, removal, damage, or alteration of files is grounds for disciplinary action, up to and including termination, and filing of criminal charges;
- No software should be loaded onto any computer without written authorization from the Akal Security Corporate IT department;

- Akal Security reserves the right to deny computer access including Internet, e-mail, or any other access to any employee; and
- Only authorized business material is to be filed on the company network. MP3 files, movies, video clips, and other non business-related files should not be stored on the company network, shared via company e-mail, or in any way using company equipment. Acquiring these items using Akal property is strictly prohibited.

Akal Security's e-mail system will not be used for the creation or distribution of any disruptive or offensive messages, including sharing of illegal files such as MP3 music files; art work, movies, or any other digital media protected by copyright; or offensive comments about race, gender, disabilities, age, sexual orientation, pornography, religious beliefs and practice, political beliefs, or national origin. Employees who receive any e-mails containing such content should report the matter to their supervisor immediately.

The creation or forwarding of chain e-mails, jokes, advertisements, junk mail, or any e-mail not relevant to company business is strictly prohibited.

Company-wide or group mailing lists may be used only for company business, and group e-mails should be sent to the minimum number of recipients necessary. Use of commercial e-mail accounts (such as Hotmail, AOL, MSN, Yahoo, etc.) for official business is prohibited without written approval from the IT manager.

Akal Security management may permit limited personal use of computers and Internet access, as long as such use meets the following conditions:

- Does not interfere with official duties or accomplishment of company mission;
- Is of limited duration and frequency;
- Serves a legitimate public interest; and
- Does not overburden network operations.

Personal use of company computers not meeting these conditions is inappropriate and not authorized. Personal use is limited to lunch, breaks, or periods directly before or after duty hours. Personal use after business hours is not authorized. The use of Akal Security-owned computers for personal business, letters, or e-mails must be kept to a minimum.

1.17.5 Network Security

Computer security is crucial. Each computer user must have an approved log-on username, created through the IT department. The user should create a unique password, which is not divulged to others because the user may be held accountable for their actions. Users must take necessary steps to protect their computer from unauthorized use and to prevent theft or loss of company-owned property, software, or information.

When unattended, the computer should be locked out or logged off. Prior to departing for the day, the user should turn off the computer and ensure that all doors and windows are locked. Media such as disks, printouts, or other documentation must be protected in a locked desk, file

cabinet, or safe office. In case of emergency, computers and electronic information should be secured as well as possible.

Every computer must have current and approved anti-virus software. Employees must report incidents of virus infection to the IT department immediately. Virus warnings are often hoaxes, so any such warnings should be forwarded to the IT department (pcsupport@akalsecurity.com). Do not distribute these warnings to anyone else, even though the hoax e-mail directs you to do so. Advisories representing any threats will be sent out by the IT department.

Only company-authorized computers, software, and network access are permitted. Reproducing copyrighted software or documentation is illegal. Original disks and/or an official software license must accompany each computer and used in accordance with the licensing agreement. Software should be installed only by permission of the IT manager. Improper use could result in damage or lost information. Important files should be backed up on a regular basis. Specific concerns about backups should be directed to the IT department.

The IT manager has overall responsibility for computer and network operations, as well as information-system security. Questions and concerns should be referred to the IT manager.

1.18.0 PROBLEM SOLVING

Akal Security understands that, occasionally, disagreements may arise between employees and supervisors. It is not beneficial to either affected party to allow the disagreement to remain unresolved. Akal Security has established a safe and effective process for resolving differences and disagreements.

1.18.1 Addressing the Problem

If you are experiencing a problem regarding company policies, conditions associated with your job, disciplinary action, or other employment-related issues, you should address the problem in writing. Submit a written description of your problem to your supervisor as soon as possible and within five days from the date the incident or action occurred.

Should you wish to not present the problem to your supervisor, use the chain of command or direct your concern in writing to the Human Resources Department. These officials will discuss your problem and respond in a timely manner.

1.18.2 Facilitating a Resolution

Akal Security offers the following suggestions to all parties involved in a dispute or disagreement, to most effectively facilitate a resolution that best serves the needs of all parties:

- Request a meeting to respectfully voice questions or opinions concerning specific issues;
- Do not disobey orders while on duty or during an incident (refusing to perform assigned duties or carry out directives will result in disciplinary action);
- Use the chain of command when a resolution cannot be achieved with your immediate supervisor;
- Submit a description of the issue or problem and a statement explaining what action you would like taken;
- Respectfully, neutrally, and without argument, articulate opinions or positions concerning issues in question;
- Do not retaliate against others when they have a different viewpoint or opinion;
- Maintain professional behaviors when confronting controversial issues; and
- Be willing to accept the decision of the appropriate authority, whether you agree or disagree;

Note: This policy does not apply to employees covered under a collective bargaining agreement.

1.19.0 EMPLOYEE PROTECTION LINE

Akal Security recognizes you as a valuable member of the team and therefore wants to provide you with the safest and most productive work environment possible. This means an environment without wrongdoing. Akal Security is committed to protecting you from workplace wrongdoing. It is Akal Security's wish that you, too, will make a commitment to create and maintain the best workplace possible.

1.19.1 Workplace Wrongdoing

Workplace wrongdoing hurts everyone. Wrongdoing such as theft, violence, unsafe acts, harassment, discrimination, drug and alcohol abuse, and misrepresenting a workers' compensation claim, can make your job more difficult and cause unnecessary loss, resulting in fewer jobs, raises, and benefits.

1.19.2 Reporting Workplace Wrongdoing

Akal Security understands that situations may exist in which you don't feel comfortable coming forward internally, so Akal Security is providing you with a safe, alternative means for reporting wrongdoing: the Akal Security Employee Protection Line.

The Employee Protection Line enables you to report workplace wrongdoings without giving your name or identifying yourself in any way; however, you must provide enough information to allow your concerns to be addressed. When making a report, you must state the name of your organization, but your call will not be traced.

The toll-free Employee Protection Line is monitored by an independent third party, who monitors reports for many organizations.

1.19.3 Calling the Employee Protection Line

Reporting a wrongdoing, using the Akal Security Employee Protection Line, requires three steps:

1. Call (800) 576-5262.
2. Provide your Employee Protection Line organization code number: 30086.
3. Provide a description of the wrongdoing.

2.0 FIELD EMPLOYEE MANUAL

2.1.0 EXPECTATIONS OF SECURITY OFFICERS

All Akal Security personnel shall conduct themselves in accordance with the highest ethical standards. The needs and welfare of the client and public shall take priority over personal needs. No security officer or employee shall behave in a manner that is unfair or opportunistic. Personal gain or personal vengeance shall not influence the conduct or dictate the course of action of any officer. A spirit of fairness and integrity shall be the standard by which all actions are gauged, on or off duty.

2.1.1 Objectives of Security Officers

The security officer has two objectives, as follows:

- **Primary objective.** Protect life and property and deter crime by serving as a visible presence. The security officer serves as a deterrent to criminal or other activity that could result in destruction of property, injury, or loss of life.



- **Secondary objective.** Observe and report to the appropriate authorities in the event that a crime has been committed or is in progress. Any security response that is beyond the skills of the security officer, contrary to the policies of Akal Security, or outside the boundaries of the contracted area of responsibility or of the directives of the client should be reported only to the appropriate authorities.

2.1.2 Limitations of Security Officers

Actions taken by the security officer are restricted to the boundaries of the private property for which Akal Security's services are contracted, Akal Security policies, contractual directives of the client, and the powers given by law to the security officer.

2.1.3 Backup and Assistance

Officers are required to request back-up assistance before entering into potentially volatile situations or when approaching suspicious persons or vehicles.

2.1.4 Decision-making Authority and Consequences for Insubordination

Authority to make decisions in a situation that falls outside the security officer's job description shall follow the chain of command described in section 2.9. Security officers are required to receive, pass on, and obey all orders by the Officer in Charge (OIC) or Post Supervisor (PS). Insubordination, or failure to immediately and respectfully comply with orders from supervisors, is ground for disciplinary action up to and including immediate termination of employment. An OIC is on call or in the field seven days a week to provide needed assistance or instruction required by security officers in the field.

2.1.5 Scheduling

Security officers are required to pick up their work schedule each week and report to duty as scheduled.

**2.1.6 Timely Reporting for Duty**

The security officer shall report for duty on time, as scheduled. If, for any reason, the officer expects to arrive late for duty, he or she must notify the OIC. Unexcused tardiness will result in disciplinary action up to and including immediate termination of employment.

2.1.7 Responsibility for Post Equipment

Security officers shall verify post equipment needs with the OIC. Security officers must sign out equipment from the main office at the change of shift. Officers are accountable for handling equipment conscientiously and responsibly. All equipment must be returned to the main office in the condition in which it was issued. Officers are required to report equipment problems.

2.1.8 Post Sign-In Sheet

Officers are required to fill out Sign-In sheets to claim pay for hours worked. Failure to sign in results in incorrect paychecks and subjects officers to disciplinary action. Sign-In sheets will be submitted to the appropriate administrator, weekly and on time.

2.1.9 Post Check-In

A post check (well-being check) will be performed by radio once each hour, using "10-89" of the radio Ten Code. If the security officer does not have a radio, the post check may be preformed via land line. This check ensures the well being, alertness, and on-post presence of the security officer.

2.1.10 Emergency Relief

Security officers shall not desert their assigned post for any reason. In an emergency situation, the officer must contact the OIC to request emergency relief. Security officers shall not leave their posts until properly relieved. Sleeping while on duty or otherwise deserting a post for any reason will result in disciplinary action up to and including immediate termination of employment.

2.1.11 Personal Telephone Calls

Personal telephone calls are not authorized to or from post telephones, except under emergency situations and approved by the OIC. Charging personal calls to “9-access” calls on a client or company telephone is grounds for disciplinary action up to and including immediate termination of employment.

2.1.12 Meals and Breaks

Security officers must check with the post supervisor or OIC for meal policies at the serviced post. Officers may eat and smoke only in designated areas and not within public view.

**2.1.13 Tobacco in the Workplace**

Use of tobacco in any form is not permitted in Akal Security vehicles or offices, or any time an on-duty officer is in the public eye. This includes the use of smokeless tobacco, cigarettes, cigars, etc.

2.1.14 Transportation and Telephone

Security officers are required to have reliable transportation and a telephone where they can be reached at all times.

2.1.15 Reimbursements

The security officer may be reimbursed for the following expenses:

- **General.** Expenses incurred by the officer for operational or administrative needs must be approved in advance and in writing through the Finance office. To claim reimbursement, the officer must submit a Requisition for Refund form, which provides a complete explanation of the expense, along with an attached receipt for the expense.
- **Mileage.** Mileage reimbursements may be claimed when the security officer is required to travel more than 25 miles (one way) from the office or primary duty station to secondary post (more than 50 miles round trip). Mileage reimbursements must be submitted on a Mileage Reimbursement form and approved by the OIC.
- **Travel time.** Travel time may be claimed when the officer is required to travel more than 30 minutes from the office or primary duty station to secondary post (more than one hour round trip). To claim travel time, the officer shall sign in on the Sign-In sheet and write “travel time” in the remarks column, as well as obtain the OIC’s initials. Heavy traffic, roadwork, or other extenuating circumstances that delay the officer’s travel time will be insufficient cause for travel-time reimbursement.



- **Carpooling.** When two or more security officers are scheduled for assignments that are more than 25 miles from the office (more than 50 miles round trip), they are expected to carpool. Security officers not participating in carpools, who request mileage reimbursement, must provide an explanation approved by the OIC on the Mileage Reimbursement form.

2.1.16 Rehiring

Before official hiring can occur, a security officer/employee, who has resigned his or her previous position with Akal Security with proper notice (minimum one week) and has maintained “satisfactory” or better performance evaluations, may be considered for rehire. A security officer/employee, who was dismissed resulting from disciplinary action, may not be considered for rehire without approval from the Corporate Human Resources department. An employee who was dismissed twice resulting from disciplinary action, may not be considered for rehire under any circumstances

2.1.17 Military Time

Security officers are required to memorize military time and use it on Sign-In sheets, logs, and other reports. As shown below, for all times after noon, add “1200” to the nonmilitary time designation. Example: 1:00 is 1300 hours (0100 + 1200 = 1300).

1:00 A.M.	0100	1:00 P.M.	1300
2:00 A.M.	0200	2:00 P.M.	1400
3:00 A.M.	0300	3:00 P.M.	1500
4:00 A.M.	0400	4:00 P.M.	1600
5:00 A.M.	0500	5:00 P.M.	1700
6:00 A.M.	0600	6:00 P.M.	1800
7:00 A.M.	0700	7:00 P.M.	1900
8:00 A.M.	0800	8:00 P.M.	2000
9:00 A.M.	0900	9:00 P.M.	2100
10:00 A.M.	1000	10:00 P.M.	2200
11:00 A.M.	1100	11:00 P.M.	2300
12:00 Noon	1200	12:00 Midnight	2400

2.1.18 Evaluations and Pay Raises

Security officers may request a performance evaluation once every six months. Consideration for pay raise is based upon the following:

- Time in service
- Time in rank
- Training courses attended
- Officer reports
- Special commendations
- Disciplinary reports
- Collective bargaining agreement (CBA)

2.1.19 Emergency Notice

When an emergency prevents a security officer from reporting for a regularly scheduled shift, a minimum of four hours' notice to the OIC or director of security (DOS) is required, unless otherwise specified in CBA. Excessive absenteeism or failure to provide three hours' notice may be grounds for disciplinary action. Security officers, who call in sick for more than two consecutive work days, are required to present a written doctor's explanation to their supervisor.

2.1.20 Appearance on Posts While Off Duty

Security officers shall vacate their posts within five minutes after the end of their shifts. Security officers shall not spend any time at the duty post of another security officer without permission from the OIC. Security officers may not bring friends, spouses, children, pets, or other unauthorized individuals to any assigned post. Personnel may patronize a client's place of business when off duty, provided the client has no objection. However, the officer shall not patronize such place of business if it is a bar, nightclub, or similar type of alcohol-serving establishment.

2.1.21 Distractions on Post

Security officers, while in uniform or on duty, shall not play any kind of video or arcade game, pinball, or other type of game (this includes using cell phones to engage in games and text messaging). Security officers shall not read or watch television while on duty. Security officers are expected to pay full attention to their responsibilities. Security officers shall not participate in any activity that distracts job duties or responsibilities. Failure to comply will result in disciplinary action up to and including immediate termination of employment.

2.1.22 Regular Foot Patrols

Security officers are required to spend a minimum of 45 minutes per hour on foot patrol at walking posts and a maximum of 15 minutes per hour writing their Shift Log and taking restroom breaks.

2.1.23 Required Tools

At all times, while on duty, personnel are required to carry a pen and small notebook in the right breast pocket and a flashlight on the belt.

2.2.0 UNIFORM DRESS CODE

The public's first contact with Akal Security personnel is visual; therefore, it is crucial that security officers present an impressive, professional image all times. Strict standards are applied to the wearing of the uniform, and this policy shall govern those standards.

Akal's Dress Code policy has been developed and implemented to guide all security officers and supervisors and should be followed as much in spirit as by letter. It is intended to create unity through uniformity, not to infringe on individual expression. Under defined conditions, it is necessary that certain individualized expressions be withheld in order to generate a unified spirit. Therefore, this policy shall stand as Akal's accepted standard.

2.2.1 Necessity for Officers to Be in Uniform

Akal Policy states officers always will be in uniform while on duty.

2.2.2 Description of Basic Uniform

Employees are expected to be in full, contract-specific uniform while on duty. Please obtain details of approved uniform requirements from your supervisor.

2.2.3 Patches, Badges, and Other Insignias

Security officers wear a variety of patches, badges, and other insignias on their uniforms, as identification and certification emblems. Please contact your supervisor for requirements pertaining to patches, badges, and other insignias for your contract and your post.

2.2.4 Headwear and Neckwear

Approved headwear shall be a dark blue ball cap, beret, or a police-style billed hat, as issued. In all operations, only the issued headwear is approved, unless otherwise indicated. Approved headwear for all Sikh personnel shall be dark blue "full" turban, to be tied neatly and firmly. During inclement weather, approved headwear may include dark blue or black watch cap, dark blue or black headband worn under beret or cap, or a dark blue or black aviator or pile cap with earflaps. If neckwear is to be worn, it shall be a dark blue or black tie. Variations in headwear and neckwear will depend upon the dictates of the local operation. This will be the decision of the local manager, who will be accountable to the division director or, ultimately, the director of Operations.

2.2.5 Leather Gear and Footwear

Approved leather gear or nylon duty gear shall be black, preferably basket weave, if leather. Such gear should be uniform with contract and/or local office operation.

Approved footwear is black shoes or boots. Traction on the shoe or boot sole is required for all footwear. Footwear may be leather or vinyl and shall have a polished surface. Suede, suede-like, canvas, or fabric materials are not acceptable. Personnel who choose to wear footwear that exposes the socks, rather than boots, shall wear black or dark blue socks.

2.2.6 Jackets and Cold Weather Wear

In cold-weather conditions, personnel shall wear the issued jacket with proper patches. Additional articles of clothing such as dark blue, black, or tan vest, thermal or long underwear, extra socks, black gloves, and dark blue turtleneck shall be worn *under* the issued clothing.

2.2.7 Allowable Exceptions

On occasion, clients may request that officers appear in “special dress,” such as for undercover work, bodyguard work, or other special assignments. On these occasions, and only by supervisory approval, an officer may report for duty in “special dress.”

2.2.8 Hair

All employees shall be clean and properly groomed when reporting for duty and while on duty. Employees will maintain uniforms, insignia, accessories, and equipment in a serviceable manner, and all items shall be kept clean and uniforms wrinkle free. Security officers and supervisors shall adhere to the following appearance guidelines:

- **Beards and mustaches.** Beards are not permitted except for medically verifiable reasons. Mustaches must be neatly trimmed and not exceed the edge of the lips.
- **Hair.** Hair and/or wigs must be natural in color and shall be kept clean, neat, and styled to present a neat appearance. For males, hair length must not exceed the top of a shirt collar. For females, hair may be worn in an “up” style, so as not to interfere with the wearing of the uniform or use of equipment. No decorations shall be worn in the hair, and items used to hold the hair in place shall be concealed as much as possible and shall be of a color and style that blend with the hair.

2.2.9 Body Markings, Piercing, and Jewelry

Generally, body markings and tattoos should not be visible when the officer is in uniform. However, a single tattoo on the arm may be acceptable, if it is not considered to be lewd or offensive to the public. Personnel with extensive tattooing on the arms may be required to wear a long-sleeved shirt at all times when in uniform. Tattoos on the neck may not be acceptable, if the uniform shirt collar does not sufficiently cover the tattoos. The site manager will determine whether body markings are acceptable.

In the same manner, hickeys, “love bites,” or “passion marks” shall not to be visible when the officer is in uniform.

Body-piercing jewelry shall not be visible when the officer is in uniform. This includes but is not limited to ears, lips, tongue, eyebrows, cheeks, or other parts of the face. This is for the safety of the officer, as well as the professional image and demeanor of Akal.

Acceptable jewelry, when in uniform, consists of a ring on the ring finger of each hand and a wristwatch. Any other jewelry may not be visible when in uniform. Necklaces must be worn under the uniform shirt.

2.3.0 UNIFORM CODE OF CONDUCT

Any individual charged with the protection of lives and property assumes a great responsibility not only for the effective discharge of his or her duties but for personal behavior as well. It is critical that all Akal Security personnel conduct themselves in a manner that is professional and instills confidence in the mind of the public.

To enhance Akal's public image and establish a standard by which security officers shall conduct themselves, this Uniform Code of Conduct has been established and is enforced. It is intended as a guideline for security officers and supervisors alike and should be followed as much in spirit as by letter. The objective of the code is not to inhibit individual expression or lifestyles but to establish a qualitative standard, which shall guide officers in the effective discharge of their responsibilities.

2.3.1 Conduct While in Uniform

Security officers must bear in mind that, while in uniform, they are symbols of authority to the public. Conduct while in uniform must be such that it assures public confidence. Because uniformed security officers come under close scrutiny, they must conduct themselves as guardians of and servants to the public. When on post and in view of the public, the officer shall remain standing except for approved, periodic breaks. Courtesy, tolerance, and sensitivity to the needs of the public, as well as the needs of the client, shall guide every officer's conduct while in uniform.

2.3.2 Conduct with the Public

Conduct with the public shall be cordial and helpful. However, every security officer shall maintain a professional reserve when dealing with the public. Flirtatiousness and casual behavior with the public will seriously compromise the effectiveness of any security officer. Furthermore, personal prejudices must not be a factor in any security officer's decision-making process. Therefore, no security officer shall permit personal involvement with the public or personal prejudices to interfere with the effective and professional discharge of his or her duties.

2.3.3 Conduct with the Client

All security officers shall treat each client with respect. After informing the OIC, most requests made by the client to an officer shall be obeyed unless contrary to company policy, or if it puts the officer or someone else at risk. Security officers shall not act as agents of Akal Security for the client; that role is the sole responsibility of appointed supervisory personnel or management. Any client complaint or request for change in type of service, scheduling, post orders, or operational procedure shall be recorded on a Pass-on and submitted immediately to the OIC. Security officers shall request the client to contact the Akal Security office to confirm a change, termination of service, or a new request. Security officers shall not accept correspondence or payment from the client unless authorized by the OIC. Officers may not accept scrap or other discarded items from the client for themselves or others. Client-owned items should not be handled or used by any Akal Security officers, except as required for duty and by contract.

As in interacting with the public, security officers shall maintain a professional reserve when interacting with clients. No security officer shall permit personal involvement with the client to interfere with the effective and professional discharge of his or her duties. Security officers considered to be too personally involved with clients shall be transferred to other posts or subject to disciplinary action up to and including immediate termination of employment.

2.3.4 Conduct with Law Enforcement

All security officers shall treat law-enforcement officers with respect and professional courtesy. Any time a law-enforcement agency responds to a call, their jurisdiction takes precedence. No security officer shall argue with or behave in a manner that is insulting or demeaning toward any sworn, on duty, law-enforcement officer. Remember, a harmonious relationship with local law-enforcement personnel is critical to Akal Security's success and well-respected reputation.

2.3.5 Conduct with Ranking Officers, Management, and Staff

All personnel shall interact with ranking security officers, management, and staff with respect and courtesy. No security officer shall behave in a manner that is discourteous or insubordinate. However, ranking officers must be sensitive to the needs of other security officers. Equal courtesy and respect is required of all ranking officers when interacting with those for whom they are responsible.

2.4.0 SAFETY

Akal Security's Safety policy consists of regulations that enable security officers to avoid preventable accidents and discharge their responsibilities in ways that ensure maximum safety and protection to themselves, clients, the public, and property belonging to Akal or others. Without some kind of consequences, laxity of safety consciousness may become severely detrimental to Akal security officers, clients, the public, and the company. Failure to comply with this Safety policy can have serious consequences, resulting in injury, property damage, loss of business or reputation, and even loss of life. Failure to comply with Akal's Safety policy is considered an act of misconduct, and such acts are subject to disciplinary action up to and including immediate termination of employment.



2.4.1 Reporting Injuries and Accidents

Employees injured on the job shall immediately report their injuries to the OIC, who will perform the following:

- Confirm that injured employees obtain medical treatment at the designated Akal medical provider;
- Obtain and signs Incident Report and First Report of Accident; immediately submits originals to office manager (OM);
- Administer breath scanner and urinalysis as soon as possible after the injury is reported;
- Notify Risk manager: 505-753-7832, during business hours; and
- Obtain Incident Review or Vehicle Accident Review, when required by the Risk manager.

When requested by the Risk manager, a Vehicle Accident or Incident Review is obtained. The OIC completes the OIC Comments section on the Vehicle Accident or Incident Review and submits all reports to the site manager. The site manager verifies that the Risk manager has been notified and submits all reports to the OM. The OM submits all reports to the Risk manager and files copies.

Injured officers are required to immediately submit to drug and alcohol testing. The OIC (or supervisors designated by the site manager or OIC) administers breath scanners and urinalysis tests following the report of any officer injury. Blood tests are ordered, when indicated, through the designated medical provider.

Failure to report injuries or accidents will further compound the problems and the results. It shall be the responsibility of the officer involved in any injury or accident, as well as the officer who has knowledge of any injury or accident, to submit a complete written Incident Report to the OIC.

2.4.2 Responding to Emergency First Aid

Officers may not become involved in a possibly toxic situation involving blood, vomit, or other bodily fluids, unless properly trained, certified, and equipped. Proper eyewear, plastic gloves, or other barrier items are required.

Officers shall not give mouth-to-mouth resuscitation unless a protective airway is used. A family member or friend may be asked to do so and should be given instructions.

If officers are exposed to possibly toxic substances, such as blood or any other bodily fluid, they are required to seek immediate medical assistance and take an HIV test.

In all situations requiring medical attention, officers are required to activate emergency medical services (EMS) by notifying dispatch to call 911 or the appropriate emergency telephone number.

2.4.3 Operating Vehicles

Officers, who operate vehicles in the line of duty, are required to comply with Akal's Vehicle Operation Procedures. Officers who fail to either wear seat belts or comply with Akal's defensive-driving procedures or any other Vehicle Operation policy will forfeit the right to operate vehicles for Akal Security in the future and may be subject to other disciplinary action. Patrol officers who fail to comply with defensive-driving procedures will be reassigned to stationary posts and also may be subject to disciplinary action up to and including immediate termination of employment.



2.4.4 Using Firearms

Security officers, who are qualified and authorized to carry firearms, must comply with Akal's Use of Firearms policy and Firearms Safety policy. The site manager, Operations manager, or firearms instructor is responsible for regularly inspecting officers' weapons. Weapons may be worn only in full view, in a thumb snap, holster, preferably high ride, that has been approved by the site manager. Akal officers are required to adhere strictly to the Firearm Safety policy for the use of firearms:

- Always assume the gun is loaded;
- Always keep the gun pointed in a safe direction;
- Always perform the safety functions; and
- Always store the gun in a safe place.

2.4.5 Conducting Foot Patrols

Officers on foot patrol are required to remain alert and use extreme caution at all times to prevent accidents or injuries. Officers should always take the following precautions:

- In dark or partially lit areas and at construction or demolition sites, officers are required to use a flashlight at all times; flashlights shall be bright and working well.
- While on patrol, officers are required to watch where they are going and carefully examine the immediate ground or floor before proceeding, to prevent stepping in pot holes, slipping or tripping on wet or slippery surfaces, colliding with protruding objects, tripping or falling on stairways, or tripping or colliding with other persons or obstacles.
- Officers shall not proceed on foot patrol when encountering incomplete or weak flooring or stairways or nonsolid ground. Officers are required to report such areas in their Shift Logs or Incident Reports, and the OIC is to be notified immediately by written Pass-on marked "Special Alert."
- Under no circumstances are officers permitted to climb on rooftops, scaffolding, or other dangerous areas or construction equipment on clients' properties.
- On stairways, officers are required to use the handrail at all times and proceed slowly and with caution. Running or skipping stairs on stairways is not permitted.
- Running is not permitted on foot patrol, except to protect oneself or another from the immediate jeopardy of serious bodily injury or death.
- Officers are required to wear shoes with traction on their soles. In the event new officers do not yet have proper shoes, they are required to obtain a traction adhesive available at shoe-repair shops. Officers are required to obtain the proper shoes within a period of three weeks from the time they begin to work for Akal.
- Officers are required to hold on to vehicle handles or bars, when getting into the vehicle, and to proceed slowly and with caution to avoid tripping or getting caught in seat belts or other obstacles in vehicles, or tripping or slipping on surfaces outside vehicles.

2.4.6 Suspected Felony Offenders

An officer shall not fire at the following persons:

- Someone who is called upon to halt upon mere suspicion and who simply runs away to avoid arrest; or
- A fleeing felon.

2.4.7 Youthful Offenders

Akal Security has always used extreme caution in regard to the use of deadly force against juveniles. Nothing in this policy is intended to reduce the degree of care required in such cases. However, if conditions and criteria of deadly force are present, the security officer shall react and respond in the same manner and not dependent upon the age of the offender.

2.4.8 Suspected, Fleeing Misdemeanor Offenders

Officers shall not use deadly force to effect the arrest or prevent the escape of a person whose only suspected offense is a misdemeanor.

2.4.9 Safety in Judgment or Action with Others

Officers are required to use extreme caution and sound judgment when interacting with others. If use of force is applied, officers are expected to provide a written Incident Report and comply with all safety procedures and Akal's Use of Force policy:

1. Officers are advised to approach subjects in unauthorized areas with extreme caution. Officers must notify the dispatcher or OIC of the intent to do so and provide a comprehensive description of the subject(s). Descriptions include vehicle license plates, approximate age, sex, race, clothing, and any distinguishing characteristics of the subject(s), and their exact location. When officers are unable to determine whether there are persons inside of vehicles in unauthorized areas, they are to proceed assuming that persons are inside the vehicles.
2. When approaching subjects, security officers are required to maintain a defensive, protective position at a safe distance, called a "reactionary gap," of at least eight to ten feet. Doing so reduces the possibility of a surprise move on the part of subjects being able to disarm or cause injury to the officer. In the event the subjects do not immediately cooperate and leave the area, the officer shall call for backup from the Akal patrol or the police and takes no further action until backup has arrived.
3. Officers may not lose their composure when subjects verbally abuse them. They may not react defensively or respond with unnecessary or unreasonable actions that could place themselves or others in jeopardy.
4. Officers are not permitted to approach subjects involved in a dispute or altercation without backup.
5. Officers are not authorized to apply the use of force on subjects without backup, unless it is necessary to protect themselves or others within Akal's jurisdiction from the immediate jeopardy of serious bodily injury or death. Officers are never permitted to interact with superior force or weapons. In such events, officers are required to take defensive, protective positions and immediately report the situation to dispatch, the OIC, and appropriate public law-enforcement authority, if warranted.

2.5.0 EQUIPMENT AND VEHICLE OPERATION

Akal Security's Equipment and Vehicle Operation policy sets forth regulations to ensure the conscientious operation of security equipment, including vehicles, and the practice of defensive driving to avoid preventable accidents. Deviation from this policy can result in serious consequences such as damage to vehicles and other property, personal injury, damage to Akal's image and reputation, and loss of life. Failure to comply with this policy represents an act of misconduct. Such acts are subject to disciplinary action.

2.5.1 Authorized Wearing of Equipment

The wearing of a firearm or other security equipment is authorized only when the officer is certified by Akal Security and when authorized by the client for each job. Failure to comply with this policy will result in disciplinary action up to and including immediate termination of employment and may be grounds for arrest, criminal action, or both.

2.5.2 Equipment Sign-Out

All personnel are responsible for confirming with the OIC any equipment needs for post assignments. Officers shall sign out equipment such as radio handle equipment responsibly and conscientiously throughout the shift, and return equipment in the condition in which it was issued. Officers shall sign in equipment upon returning it to the Akal office at the end of the shift. Officers are required to immediately report equipment problems such as malfunctions or missing equipment, on the Vehicle/Equipment Discrepancy Report.

2.5.3 Preventable Driving Accidents

Preventable driving accidents are those accidents resulting from the driver's failure to use defensive-driving procedures or exercise every reasonable precaution to prevent the accident. This is irrespective of the location of the accident, whether there were citations issued, injuries incurred, vehicle or property damage, extent of injuries or damage, or to whom injuries occurred. An accident may be judged preventable even though the driver did not violate traffic regulations or receive a citation. Adverse driving conditions involving light, weather, road conditions, traffic conditions, vehicle condition, and driver's physical and mental states are all factors that require Akal drivers to make special adjustments to prevent potential accidents.



2.5.4 Rental Vehicles or Other-Owned Vehicles

If an officer is driving a rental vehicle or any other-owned vehicle in the line of duty for Akal, all policies on Akal vehicle-operation procedures apply.

2.5.5 Personal Use of Company Vehicles

No officer shall operate a company vehicle for personal use without prior approval from the site manager. In branches having a designated vehicle coordination officer, he or she advises on the status and availability of each vehicle

2.5.6 Passengers

No passengers are allowed in vehicles used in the line of duty without prior approval from the site manager. If the passenger is an approved nonemployee, a Waiver of Liability must be completed by the passenger and submitted to the office manager (OM).

2.5.7 Keeping Vehicles Clean

Drivers of company vehicles are responsible for keeping the vehicle interior clean. No food, trash, clothing, or personal belongings can remain in them.



Note: Smoking is not permitted in any company vehicle.

2.5.8 Criteria for Authorization to Drive

The site manager is responsible for ensuring that every individual, prior to being permitted to drive a vehicle in the line of duty, submits his or her driving record, shows his or her local, current, valid driver's license, and passes the Akal Security Defensive Driving course. The OM submits a copy of the driving record to the Risk manager and files the original in the employee's personnel file.

For branches in which every employee is a driver, *all* new applicants are required to submit their driving records and their local, current, valid drivers' licenses.

The site manager ensures that the following criteria are used to determine each individual's eligibility to drive vehicles in the line of duty:

1. A potential driver is not qualified if there are any speeding or traffic violations or outstanding citations on his or her driving record. This may be waived only by the Corporate Office in the event of other overriding qualifications.
2. A current driver may be disqualified and have driving privileges revoked if he or she is cited with a violation while driving a vehicle in the line of duty.

3. A current driver will be issued a first warning, if one speeding or traffic violation appears on his or her driving record.
4. A current driver will be issued a second warning, if two speeding or traffic violations appear on his or her driving record.
5. A current driver may be disqualified and have driving privileges revoked, if three speeding or traffic violations appear on his or her driving record, until the driving record gets cleared.

2.5.9 Driving Record and Annual Status Check

The site manager is responsible for ensuring that an annual status check is performed on all current drivers. Each year, on December 15, a Drivers Information List of current drivers is mailed to the Motor Vehicles Department (MVD) office with the proper fee to obtain the driving record of all current drivers.

The OM, or designee, obtains Driver Information forms for all current drivers, and the OM records the information onto the Driver Information List. The list is mailed to the local MVD office, with a written request to send a copy of the driving records for the drivers listed. The cost for multiple driving records is obtained from the local MVD office. In most states, the MVD will release multiple driving records to employers only and only if the fee accompanies the written request. All information obtained is submitted to the Risk manager by December 31 of each year.

The site manager may obtain more-frequent copies of the driving record, if a driver has one or more violations. In this case, the site manager may require the driver to submit a copy of his or her driving record every 60 to 90 days.

2.5.10 Operating Vehicles in Accordance with Laws

Akal personnel shall operate vehicles in the line of duty in accordance with current laws. Reckless or careless driving will not be tolerated. Akal Security is a private enterprise, and no vehicles of Akal are considered emergency vehicles. Therefore, no one has authority to drive with excessive speed or disregard for traffic signals, rights of way, or other laws.

Note: Seat belts shall be worn at all times by the driver and all passengers.

2.5.11 Defensive Driving

Defensive-driving procedures are regulations that enable Akal drivers to prevent accidents, despite wrong actions by other drivers or adverse driving conditions involving weather, light, road or traffic conditions, vehicle function, or the driver's physical or mental state. Defensive drivers allow for the lack of skill, improper driving practices of other drivers, and other unfavorable driving conditions. They adjust their own driving to compensate for such conditions. Defensive drivers recognize the need for caution in unfavorable conditions, and they stay alert. They recognize the need for preventive measures in advance, and they take the necessary action to slow down, stop, or yield right-of-way to avoid being involved in an accident. Defensive driving requires that drivers adhere to the following cautionary measures:

1. **Consciously prepare to drive.** Prior to placing the key in the ignition, the Akal driver pauses to remember to be safe and conscientious in the operation of the vehicle.

2. **Prevent accidents at intersections.** The Akal driver approaches, enters, and crosses intersections in such manner as to be prepared to avoid accidents that might occur through the actions of other drivers. The Akal driver anticipates complex traffic movement, blind intersections, failure of other drivers to conform to law or traffic-control devices, and takes necessary precautions prior to crossing the intersection. Failure to take necessary precautions can result in an accident that could have been prevented. When entering an intersection and seeing obvious irresponsible actions of other drivers—such as excessive speed, crossing the lane in turning, or coming from behind a blind spot—the Akal driver is expected to respond defensively and proceed with extreme caution to avoid an accident.
3. **Prevent accidents with vehicles ahead and behind:**
 - ***Vehicle ahead.*** Regardless of an abrupt or unexpected stop by the vehicle ahead, the Akal driver can prevent rear-end collisions by maintaining a safe following distance at all times. This includes being prepared for possible obstructions on the highway, either in plain view or hidden by the crest of a hill or the curve of a roadway. Overdriving headlights at night is a common cause of rear-end collisions. Night speed should not be greater than that speed which would permit the vehicle to come to a stop within the forward distance, illuminated by the vehicle headlights.
 - ***Vehicle behind.*** Traffic investigations often reveal that drivers risk being struck from behind when they fail to maintain a safe margin in their own following distance. Collisions involving the rear of the vehicle are often preceded by a rollback at a grade intersection, abrupt stop, traffic-signal change, or a driver failing to signal a turn at an intersection. The Akal driver is required to maintain a safe following distance at all times to prevent accidents with the vehicle behind.
4. **Prevent accidents when passing or being passed:**
 - ***Passing.*** Accidents that occur during passing indicate faulty judgment and failure to consider safety factors. The defensive driver is required to consider the current speed of the vehicle to be passed, observable distance available for passing, passing capability of the vehicle being driven, and the effect traffic, road, and weather conditions could have on the passing maneuver. In addition, the possible unusual actions of the driver to be passed or of oncoming traffic need to be considered. The Akal driver understands the passing maneuver is voluntary and entirely his or her responsibility.
 - ***Being passed.*** Sideswipes and cut-offs involving a driver being passed are preventable. The Akal driver yields to the passing vehicle by slowing down or moving to the right where possible.
5. **Prevent noncollision accidents.** Many accidents, such as overturning, jack-knifing, or running off the road, result from emergency action by the driver to avoid being involved in a collision. The Akal driver takes necessary precautions in advance by slowing down, stopping, or yielding the right-of-way to avoid the need to make dangerous emergency maneuvers.

6. **Prevent accidents with oncoming vehicles.** Traffic investigations reveal that drivers involved in head-on collisions often fail to signal the opposing driver, who has entered the driver's traffic lane, nor do they make an attempt to slow down, stop, or move to the right. The Akal driver makes every attempt to safely avoid collision with an opposing driver, who has entered his or her traffic lane, by slowing down, stopping, or moving to the right when possible, flashing headlights, and sounding the horn immediately and continuously, to signal the opposing driver.
7. **Prevent accidents with pedestrians.** The driver has the responsibility to yield the right of way to pedestrians. The Akal driver takes the necessary precautions to prevent accidents with pedestrians by remaining constantly alert for a pedestrian, who takes an unusual route at mid-block or appears from between parked cars. The Akal driver is especially alert in school zones, shopping and residential areas, and on streets with special pedestrian traffic, bicycles, motor scooters, or other equipment used by young and inexperienced operators. The Akal driver reduces speed and increases side-space cushions when approaching pedestrians or this type of equipment to prevent the possibility of an accident. When unusual conditions call for voluntary speed reduction, the Akal driver takes the necessary action, rather than only keeping within posted speed limits.
8. **Prevent accidents with fixed objects.** Collisions with fixed objects are preventable. The Akal driver remembers to verify clearances, especially when backing up. He or she remains alert for unusual conditions such as unfamiliar territory, resurfaced pavement under viaducts, inclined entrances to loading docks, marquees projecting over a traveled section of road, or any unexpected obstruction on the road. By remaining alert at all times the Akal driver can make the necessary adjustments to avoid collision with fixed objects.
9. **Prevent accidents resulting from road or vehicle condition.** Akal drivers are required to be especially cautious and alert during inclement weather or when road conditions make driving more hazardous. In addition, Akal drivers are required to report on a Vehicle Discrepancy Report (VDR) any problems found while operating Akal vehicles: burned-out lights, flat tires, unusual noises, etc. VDRs are submitted immediately to the commander, who will ensure that the VCO or DFO corrects the problem.
10. **Prevent accidents resulting from mental or physical condition.** Akal drivers are required to make certain they are well rested and are not allowing personal or emotional problems, medication, drugs, or alcohol in their systems to impair driving ability. If an Akal driver is unable to drive in an alert mental state, he or she is required to request emergency relief from the OIC.

2.5.12 Reporting Damage

Akal officers shall immediately report equipment damage or loss, vehicle accidents, or any damage occurring to vehicles used in the line of duty to the OIC.

- OIC obtains Incident Report and notifies the Risk manager: (505) 753-7832, during regular business hours.
- OIC obtains Accident Review Report from driver and provides to Risk manager.

- OIC ensures that the individual operating the vehicle at the time the damage occurred completes an Incident Report, Notice of Accident (RM 320a – New Mexico only), Supervisor's Report of Accident (RM 320b), when requested by the Risk manager.
- Driver completes the Accident Review Report (RM 320c).
- If another vehicle and driver are involved, the driver should complete the Other Driver Information Report (RM 470).

2.5.13 Accident/Incident Review

The purpose of the Vehicle Accident Review and Incident Review is to assess how the accident could have been prevented. If the site manager obtains permission from the Corporate Office to waive the Board of Inquiry, the site manager will determine from the reports whether the accident was preventable and, then, submit all reports and final decision to the Corporate Office.

If the site manager convenes the Board of Inquiry (Corporate Operations and Human Resources departments), the board members review the circumstances of the accident and assess whether the accident could have been prevented. They may request that the officer appear before them, to answer additional questions, or respond in writing to their questions. Board members will also carefully consider whether the Akal driver used defensive-driving procedures. The Board of Inquiry reports its findings on whether the accident could have been prevented, offers specific suggestions on how such an accident could be prevented in the future, and makes recommendations for disciplinary action, if any.

2.5.14 Personally Owned Vehicles

Akal personnel are not authorized to use a personally owned vehicle (POV) or other non-authorized vehicle for regular patrol of a post. During inclement weather, the officer is permitted to spend 15 minutes each hour in the vehicle, writing reports, warming up, or cooling down. Any officer found spending more than 15 minutes in a POV will be subject to disciplinary action, up to and including termination, if found sleeping or otherwise engaging in inappropriate behavior.

2.6.0 USE OF FORCE

One of the greatest trusts placed upon a security officer is the responsibility of balancing the constitutional protection of an individual against the interests of society. Use-of-force applications are constitutionally permissible when requirements under the law governing the use of force are met. Specific written post orders and contractual requirements must be followed. This balance of responsibility holds officers accountable for discriminate and indiscriminate use of force based upon the reasonableness of the officer's reactive decision. Officers must be ready and able to justify their use-of-force response with the constitutional and judicial standard of "objective reasonableness" at the instant the force was used. Every use-of-force application will be reviewed, assessed, and ultimately judged by society, potentially by criminal as well as civil courts, the client, and Akal Security. Regardless of the dynamics of the use-of-force situation, the standard of reasonableness mandates the officer's response. Officers must manage situations professionally, always aware of what constitutes a reasonable and appropriate response to a potential incident. Objective reasonableness, totality of the circumstances, factual articulation, and the officer's mental preparation are principles that shall guide officers to make reasonable, legal, tactical, and appropriate decisions regarding the application of force. Therefore, the use of unnecessary or excessive force is not justified. Violations of Akal's Use of Force policy, procedures or acts of negligence are subject to disciplinary action, up to and including termination of employment and potential criminal prosecution and civil liability or action.

2.6.1 Definitions

To comply with Akal Security's Use of Force policy, the officer should understand the following terms and definitions:

Force. Any physical effort or tool used to control, overpower, restrain, or overcome the resistance of another.

Less lethal force. Measures or equipment designed to incapacitate without causing death or serious bodily harm. These measures, when deployed properly, still possess the potential to cause death or serious bodily harm. All further references to the use of force shall pertain to less lethal force, except where specifically noted.

Deadly force. Any use of force that is likely to cause death or serious physical harm.

Serious bodily harm. A bodily injury that creates a substantial risk of death, causes great bodily or physical injury, large gaping wounds, major broken bones, damage to the spinal column, head, or brain, substantial burns or permanent disfigurement, protracted or prolonged recovery time, or results in long-term loss or impairment of the functioning of any organ.

Unreasonable force. Officers shall use only that force which is objectively reasonable. Unreasonable force is that force which is unnecessary or excessive given the circumstances presented to the officer at the time the force was applied. Unreasonable force is prohibited. The use of unreasonable force will subject an officer to possible disciplinary action, up to and including termination of employment and/or criminal prosecution.

Objective reasonableness. The U.S. Constitution, Fourth Amendment, is the standard for all use-of-force applications. The legal standards for the use of force are outlined in U.S. Supreme Court cases.

Security Officer. Any Akal Security employee or personnel employed as a security guard, officer, or other security-related function, assignment, or position.

2.6.2 Reasonable Force Standard

Reasonable force is the degree of force a reasonable person, who is present on the scene, would believe is necessary to neutralize the threat or stop the action in order to maintain officer safety and safety of others.

Reasonable considerations may also include the disparity of force and multiple subject and officer factors, based upon the totality of the circumstances, as incidents could be tense, uncertain and/or rapidly evolving. Frequently, an officer must make a split-second decision at the moment force is used.

2.6.3 Criteria for Show of Force

A show-of-force ready position is justified if an officer has reason to believe, based upon the totality of the circumstances known to the officer at the time of decision, that a situation or threat could escalate and could result in bodily injury.

“Show of force” refers to displaying or drawing an Akal Security–approved defensive-impact tool, equipment, or weapon to a ready position. It is intended to reasonably help protect the officer and others to deter the risk of bodily harm to the officer or another person by attempting to deescalate the situation. A show of force also assists the officer by reducing the officer’s reaction time.

For example, a security officer may direct a subject to lie on the ground as a means of neutralizing the potential danger. In addition, the use of handcuffs may be reasonable to temporarily stop a potentially dangerous situation.

The show of force of an approved defensive-impact tool, equipment, or weapon is only permissible when the officer reasonably believes that drawing to a show-of-force position is necessary for the protection of self or others. More specifically, any officer who draws to a show-of-force position is required to demonstrate that the facts available to the officer would cause a person of reasonable caution to believe the action taken was appropriate.

2.6.4 Criteria for Use of Force

The criteria for the use of force are to stop the threat of bodily injury to the officer or another person or to overcome physical resistance of a subject. The decision regarding which level of force the officer will apply must be based upon what is reasonable to effectively neutralize the threat, stop the action, or overcome the demonstrated resistance of the subject. A security officer’s use of force is assessed by examining the facts and circumstances known to the officer. Use of force is justified and evaluated according to the following criteria:

- Reasonableness standard;
- Severity and intensity of the subject’s actions;

- Immediacy of threat posed by the subject to the safety of the officer or others; and
- Whether the subject is actively resisting a lawful order or direction.

2.6.5 Levels of Force and Authorized Defensive Equipment

The objective reasonableness standard applies to all uses of force. Concepts of the elements of reasonableness can apply to the officer, other people, or an action. They guide the officer in determining the appropriate level of force necessary to overcome resistance and/or aggression directed at an officer or another person. Further, they assist the officer in determining force-escalation justification and de-escalation based upon the subject's actions and behaviors.

The basis of reasonableness of the officer's response should be applied within the totality of the circumstances of each specific incident. The objective reasonableness standard applies to what a reasonable officer could believe or conclude based upon factual articulation.

Officers will carry defensive equipment, impact tools, and firearms only when approved by contract and authorized in writing by the Akal Security Post Orders or equivalent. Before officers may carry any approved defensive equipment, impact tools, and a firearm, they must successfully complete authorized training. Officers must maintain a current training certification or documented record of completed training from the Akal Security Training Academy or an Akal Security-recognized training academy, school, or course. Approved training techniques in the use of defensive equipment shall be applied, and guidelines of reasonable force shall always be followed. Officers not authorized or properly trained with specific defensive equipment, a defensive tool, or firearm may not carry or use that specific item. Officers must receive all training required by post orders and contract requirements prior to assignment at a particular post. Application of techniques or methods not approved by the Akal Security Training Academy or policy may result in liability upon the officer, and Akal Security will not support personnel who misuse equipment in a manner contrary to this policy.

An officer may respond with the most-effective level of force, as long as the reasonableness standard is applied to neutralize the threat or stop the action. The reasonableness standard does not require that personnel select the least intrusive alternative but a legally reasonable one based upon the subject's actions and behaviors. It is important to recognize that the cooperative controls can be employed at all levels, in addition to those tools identified throughout all of the levels of force.

Akal Security recognizes the following reasonable force options or levels of force for security officers:

1. Command presence, verbal communication skills, and conflict management
2. Contact control
3. Physical compliance techniques, oleoresin capicum (OC) pepper spray, tasers, and temporary protective restraints
4. Defensive tactics and tools with impact capability
5. Use of firearms

Based upon feasibility, verbal commands should be used during both show-of-force and use-of-force incidents.

2.6.6 Unnecessary or Prematurely Drawing of Equipment

Officers may not draw or exhibit any defensive equipment, unless circumstances surrounding the incident create a reasonable belief that it may be necessary to use the equipment in conformance with this and other Akal Security policies. Objective reasonableness is the standard for all show-of-force and use-of-force decisions. Unnecessary actions may be viewed as a criminal assault on the part of the security officer.

Further, unnecessary or prematurely drawing or exhibiting defensive equipment, impact tools, protective restraint devices, or a firearm in a threatening manner, when not justified by a subject threat, could create anxiety on the part of citizens and may result in an unnecessary escalation of violence.

2.6.7 Weapons of Opportunity in Emergency

The purpose of this policy is to allow personnel to defensively use objects or items in an emergency situation only. Every officer is expected to use approved defensive equipment, unless he or she is unable to do so in an emergency or exigent circumstances. The officer should remember that the reasonableness standard applies to all uses of force.

Weapons of opportunity should not be used, unless a use-of-force situation arises and the officer is unable to get to, access, or use authorized defensive equipment, impact tools, or firearm that he or she has been trained to use.

Weapons of opportunity considerations for the officer also exist when approved defensive equipment or weapons malfunction and the equipment or weapon is rendered inoperable at the time of needed use. An officer should not use a weapon of opportunity to defend against an attack unless two conditions exist:

1. Sufficient cause exists for the appropriate and reasonable application of force; and
2. The officer is unable to draw or use the approved defensive equipment or firearm.

In summary, the officer must be ready and able to justify a use-of-force response with the constitutional and judicial standard of objective reasonableness at the instant force was used.

2.6.8 Brutality

Personnel shall not brutalize, abuse, or engage in excessive force with a subject. Once a subject no longer poses a threat or demonstrates compliance, the application of force must stop. Security officers should not exceed the limitations of that which is legally considered to be a reasonable application of force.

Reasonableness and good judgment, combined with skill and proper training, should be guidelines for the use of force. Brutality creates resentment and can have far-reaching consequences to the security officer, the public, and the company. Brutality and excessive force is strictly forbidden by Akal Security policy and is considered a violation of both criminal and civil law.

2.6.9 Pursuit

To reduce the risk of injury and liability, personnel shall not engage in the pursuit of any subject, in any manner, whether on foot, bicycle, vehicle, or any other means.

2.6.10 General Use of Force

Objective reasonableness requires more than an officer's subjective beliefs about a subject and the level of threat that the subject poses. Indeed, an officer cannot base a decision to use force on a hunch, feeling, or other unquantifiable belief. This is an objective test, which means the officer's good faith belief for taking certain action is irrelevant. Instead, an officer must be able to identify specific and definable facts, based on the subject's actions or behaviors, which led to an objective and reasonable decision to act.

Officers must identify the information they observed, heard, or otherwise collected through reliable channels and the source of that information. Sometimes just as important, an officer must identify unknowns and why this lack of information is critical to an assessment of the subject's threat level.

Based on those specific and articulable facts, officers can then use their training and experience to interpret the known information and reach a reasonable conclusion as to the level of threat posed by the subject. Stated another way, the conclusion an officer draws about a subject must be based on the reasonably known facts.

2.6.11 Use of Force Model

The following definitions were developed for each of the levels of officer response to the subject's actions. The Use of Force model is a training tool to teach and promote the appropriate officer response and application of force. The Use of Force model described herein can be used in conjunction with the guidance provided by the U.S. Constitution to assist with reasonable use-of-force determinations. The primary goal of the officer's effort is to legally gain and maintain control of the subject.

1. Command presence, verbal communication skills, and conflict management

(a) Subject action

Compliant (cooperative) or verbal resistance: Likelihood of physical action by the subject is minimal.

(b) Officer response

Presence and verbal communication: Methods to preserve officer safety and survival include but are not limited to officer's presence, verbal commands if feasible, positioning strategies, tactical cover positions and retreating or escape options.

Verbal skills are the level of force most often utilized by a security officer. Where feasible, it is in the best interest of all concerned that officers use effective verbal skills with conflict management techniques, crisis intervention, and tactical communication. It must be understood that once a situation escalates beyond this level of force, it is normally more difficult to reach a simple resolution. Verbal communication should also remain professional and not profane, obscene, or

abusive in nature. Concentrated efforts should be made to resolve the situation at this level, when feasible.

2. Contact control

(a) Subject action

Passive physical resistant: Subject exhibits preliminary level of noncompliance, which requires some degree of physical contact by the officer in order to obtain compliance. Subject makes no attempts to physically defeat the officer's actions but forces the officer to employ physical maneuvers to establish control. Subject offers no further physical or mechanical resistance or action that would escalate the officer's response decision if the level of resistance increased.

(b) Officer response

Contact control: Objective reasonableness requires more than an officer's subjective beliefs about a subject and the level of threat the subject poses. The officer cannot base a decision to use force on a hunch, feeling, or other unquantifiable belief. This is an objective test, which means the officer's good faith belief for taking certain action is irrelevant. The officer must be able to identify specific and definable facts, based on the subject's actions or behaviors, the total of which led to an objective and reasonable decision to act.

3. Physical compliance techniques, oleoresin capsicum (OC) pepper spray, tasers, and temporary protective restraints

(a) Subject action

Active physical resistant: The scope and intensity of the subject's resistance has increased, or distance and reaction time have decreased. Subject is exhibiting physical or mechanical defiance to officer's control. Subject is using physical energy to establish defiance or to maintain resistance by bracing or tensing, attempts to push or pull, or does not allow the officer to get close to the subject. Subject's resistance does not necessarily have to be directed at the officer.

(b) Officer response:

Physical compliance techniques: If the subject becomes actively resistant, the officer may use physical control tactics. These tactics should be of sufficient force to overcome the subject's active resistance and still remain within the reasonable use-of-force standard. The officer should remain vigilant and aware of possibly more aggressive behavior from the subject. Examples of control tactics include pressure-point applications, takedowns, stabilization techniques, oleoresin capsicum (OC) pepper spray, and tasers.

One of the main purposes of less lethal, temporarily incapacitating devices such as OC aerosol spray is to give personnel effective control options short of deadly force that can be used to help stop or slow down an attack, if feasible. As a means of imposing force, OC spray is generally of limited intrusiveness and is designed to disable a subject without causing permanent physical injury.

Personnel may use OC spray to subdue an unarmed subject who threatens the safety of an officer or another person. In contrast, an example of excessive force is

an officer repeatedly spraying OC in the face of an unarmed subject who is not physically threatening, attacking, or resisting, or a subject who, once sprayed, becomes subdued and compliant. Remember, the use of an approved chemical agent is to help subdue an otherwise uncooperative subject who is physically threatening or attacking an officer or other person or is physically resisting an officer's lawful orders and commands. Approved chemical agents should be used with caution to prevent contamination of innocent bystanders.

A taser is a less lethal weapon that delivers an electric shock and is used to control violent or potentially violent subjects. An officer may use a taser to control increasingly hostile subjects, uncooperative subjects who are actively resisting lawful orders, or violent subjects who are not responding to verbal commands. As with other defensive equipment, tasers must be contractually authorized for officers to carry and only after successful completion of Akal's approved training. Protective restraint devices are to be applied when a subject's behavior poses a threat to the officer or the public, or when restraint of the subject is completed for the safety of all concerned.

4. Defensive tactics and tools with impact capability

(a) Subject action

Physical assault with bodily injury: The officer has the immediate perception that an attack likely to result in bodily injury is imminent. The officer makes the reasonable assessment that such actions by the subject would not result in death or serious bodily injury to the officer or others. The depth or intensity of a perceived attack has significantly increased.

For example, a subject making an overt, hostile, or aggressive movement that is perceived as an aggressive physical attack, which may cause bodily injury but is not likely to cause serious bodily injury to the officer or to others.

(b) Officer response

Defensive tactics: Subject attempts or achieves an assault on the officer or on another person. The officer is justified in using defensive tactics or techniques to stop the subject's nonlethal assault on the officer or others, regain control of the situation, and ensure continued compliance by gaining and maintaining control of the subject.

Defensive tactics or techniques could include but are not limited to movement, blocking, counter-redirecting moves, elbow strikes, knee strikes, empty hand strikes, baton strikes to less-lethal areas as intermediate control, and restraint techniques with protective restraint devices.

Use of unarmed or empty-hand techniques are to be applied when officers must react to defend or protect themselves or another person. Officers are authorized to make physical contact with a subject when they or others are faced with an imminent threat of injury, and the application of force is necessary to neutralize or stop the threat.

5. Use of firearms**(a) Subject action**

Assaultive, with serious bodily harm: The highest level of noncompliance poses the most serious threat to the officer. The officer's objectively reasonable assessment is that such assaultive actions by the subject could result in death or serious bodily injury to the officer or another person. If the subject's action is not stopped, an innocent citizen or an officer could be seriously injured or killed.

(b) Officer response

Deadly force: Officers are authorized to use deadly force in order to protect themselves or others from what is reasonably believed to be an imminent threat of death or serious physical harm.

Where feasible, some warning should be given prior to engaging in the use of deadly force. When the officer perceives that the subject has the opportunity and ability and poses imminent jeopardy for potential death or serious bodily harm to the officer or another person, immediate officer response must be used to stop the serious bodily harm threat or action of the subject. The elements of ability, opportunity, and imminent threat of serious bodily harm must be present. The officer's tactics could include but are not limited to the use of a firearm or a weapon of opportunity if a firearm is not immediately available, is inoperable, or does not stop the violent action of the subject. When feasible, officers should give appropriate medical assistance to injured subjects in circumstances where the officer's safety is no longer in jeopardy.

2.6.12 Supervisor Notification

When a show-of-force or use-of-force incident occurs in response to a subject's actions, an officer needs to contact and notify his or her immediate on-duty supervisor to allow notification up the chain of command. When appropriate, the local law-enforcement agency of jurisdiction must also be notified.

2.6.13 Emergency Medical Services Notification

Following a use-of-force incident in which an injury or complaint occurs, the officer should contact EMS through appropriate communication channels and constantly assess the individual's medical condition, if feasible, until EMS arrives. Officers need to be aware of possible secondary threats that may be posed to themselves or other individuals, and react accordingly. Officer safety and awareness also includes notifying EMS for any possible injury to the officer.

2.6.14 Documenting Show-of-Force or Use-of-Force Incidents

Officers displaying a show of force or any use of force with an Akal Security–approved defensive impact tool or firearm must notify their supervisor and complete an Incident Report (IR) for documentation.

An IR must be completed to accurately describe all facts known to the officer at the time force was used or displayed. The officer must submit the completed IR and a Use of Firearms Report, if applicable, to his or her supervisor for review and approval. A supervisor needs to verify, through a detailed review, that all reports have been accurately completed prior to signing and submitting.

In summary, an officer using force to protect or defend self or others against a threat while on duty should notify his or her Akal supervisor, complete an IR, and contact the local law-enforcement agency of that jurisdiction. EMS, or equivalent, must be notified, if an injury or complaint of injury has occurred.

2.7.0 USE OF FIREARMS

Reverence for the sacredness of human life shall guide officers in considering the use of deadly force. While the officer has an affirmative duty to use that degree of force which is legally reasonable to protect human life, the use of deadly force is not justified merely to protect property interests. Security officers are charged with the protection of persons and property within the limits of the boundaries for which Akal's services are engaged. It is in the public interest that officers of Akal Security be guided by a policy the public believes to be fair and reasonable and creates public confidence in Akal's service, as well as in the officer's performance. In so doing, personnel gain confidence in discharging their duties responsibly and professionally. It is not the intention of this policy to create doubt or hesitation in the mind of the officer at a moment when a reasonable response is critical for safety and there is little or no time for confusion or reflection.

This policy provides the basics for governing the use of firearms, so that officers can be confident in exercising proper reasonable judgment of the propriety of the response taken. It is not considered a standard for external judgment; this is a matter of established law and for the judicial system to review the specific facts of a given incident. Reasonableness, totality of the circumstances, mental preparation, and factual articulation are essential concepts or principles to help the officer develop the ability to make "objectively reasonable" decisions.

In summary, the decision to use deadly force is the most serious decision an on-duty officer will make. Once the officer applies deadly force, that force is irreversible. Further, indecisiveness can be as dangerous as an impulsive reaction; therefore, each officer must be reasonably clear as to when to resort to any use of force option. Hesitancy or inaction may be deadly to the officer and/or another person.

2.7.1 Qualifications for Carrying a Firearm

A security officer is authorized to carry a firearm while on duty when the following qualifications are met:

1. The officer has successfully completed a background investigation;
2. The officer is licensed to work as a security officer by the appropriate regulatory agency, licensing authority, or in accordance with the prevailing contract or regulations;
3. The officer has successfully completed all training prerequisites needed to take the firearms qualification course, based upon contractual requirements or local policy and procedures or law (contractual requirements may require additional courses);
4. The officer has successfully completed the Akal Security Firearms Qualification (FAQ) course, a firearms qualification course recognized by Akal Security, or a contractually required firearms qualification;
5. The officer's FAQ status must be current and cannot exceed one year;
6. The firearms instructor, range master if applicable, and a local Akal manager have given approval for the officer to be armed (they also have the discretion to not allow an officer to be armed, based upon safety concerns or failure of the course);

7. Only when contractually required by a client will firearms be carried, and only by those officers who have been trained, certified, and licensed to carry firearms in accordance with Akal Security policies;
8. All applicable local, state, and federal guidelines, laws, and weapons licensing requirements have been met; and
9. The officer will always follow and obey the Four Cardinal Rules of Firearms Safety, as follows:
 - (a) All guns are always loaded! No exceptions.
 - (b) Never let the muzzle cover anything you are not willing to destroy or are legally justified to shoot.
 - (c) Keep your finger off the trigger until the sights are on the target.
 - (d) Be sure of your target! Know what is in front of it, know what is to each side of it, and know what is behind it or around it.

2.7.2 Carrying Approved Firearms

Firearms carried on duty shall meet the approval of an Akal Security firearms instructor, or individual authorized to approve those firearms, and be listed on an Akal-authorized firearms manufacturer list. The firearm also must be of an approved caliber, which consists of a caliber not smaller than 9 mm and not larger than a .45 caliber. Officers may carry only those Akal Security–approved firearms with which they have qualified on the range or of the same make and model, in an Akal FAQ course, an Akal– approved firearms course, or a contractually required qualification course. Further, in those operations where firearms are issued to personnel due to contractual requirements, only the issued firearm and issued ammunition may be carried by the officer on duty. Firearms and holsters shall be kept in a safe working condition, as approved by an Akal Security firearms instructor or a certified armor.

The equipment listed below must to be approved by the firearms instructor and the local site manager, Operations manager, or equivalent unless specified by contract, if the officer is responsible for supplying his or her own firearm and equipment.

- All firearms, holsters, and loading sources, if applicable, must be maintained in a reliable and safe working condition.
- The manufacture and model of the firearm, holster, and loading sources must be authorized. For safety, a secure mid- to high-ride holster that covers the trigger guard is required.
- The condition of the firearm also includes the manner or method in which it is carried while on duty and is dependant upon contractual requirements.
- Firearms carried on duty for Akal Security shall be worn in full and plain view, unless otherwise specified by a particular contract. Thumb-snap holsters increase weapon retention and safety. Additional industry-standard, holster-retention devices are allowed, if the holster is not issued, to assist with officer safety.
- The total number and type of loading sources needs approval.

- Firearms may not be altered or modified from manufacture specifications to include the trigger weight.
- Factory ammunition specifications and type, to include the amount of ammunition, needs approval.
- The manufacture, type and condition of the duty belt and underbelt, if applicable, to include all items and equipment placed onto the duty belt, needs approval. Unauthorized gear or equipment is not allowed
- Firearms shall be carried strapped in and secured as follows:
 - Revolvers: hammer down
 - Single-action semiautomatics: hammer back, safety on
 - Double-action semiautomatics: hammer down, safety on

If the officer is issued or supplied a firearm and equipment for duty, it must be properly maintained to include all requirements listed above and carried according to contractual requirements, when applicable. Any deviations or changes of a firearm or equipment could result in disciplinary action up to and including termination of employment. Deviations or such changes may subject an officer to criminal procedures and liability exposure.

2.7.3 Necessity for Personnel to Be Armed

It is an accepted fact that, in the performance of their lawful duties, personnel may be confronted with deadly force decisions. Due to potential, serious bodily harm or deadly threats against the public and officers, it will remain necessary for personnel to be trained and appropriately armed for the protection of self and the general public while in the performance of lawful duties.

2.7.4 Show of Force

If a subject is in possession of a weapon or has the ability or means to cause serious bodily harm or death, the drawing to a show of force or a low-ready position is permissible. The officer should attempt to move to a position of tactical advantage and give professional, loud, clear, and concise verbal commands when the officer is at a show-of-force position.

The purposes of a security officer displaying a firearm at a show-of-force or low-ready position are to reduce the officer's reaction time when defending and protecting themselves or others and to attempt to deescalate the situation by trying to persuade the subject(s) to discontinue their violent threats and/or actions. The officer must reasonably believe that drawing or exhibiting a firearm is necessary for the protection of self or others.

2.7.5 Protection of the General Public

Officers should not fire under conditions that would subject bystanders or hostages to possible injury or death. Firing under such conditions is not justified unless failure to do so at the time would create a substantial and imminent threat of serious bodily harm or death. Officers must be sure of their target and surroundings.

2.7.6 Definitions

Ability. Subject has the capability, weapon, or means to carry out a threatened action of serious bodily harm or death.

Opportunity. Subject must be in a position, reasonable distance, or proximity in which he or she can effectively apply his or her ability to carry out the act or threat.

Imminent threat. Immediacy or level of threat posed by a subject and is a function of two factors: (1) method or means used by the subject to deliver force against an intended victim; and (2) time or distance necessary for the subject to deliver that force.

Another way of describing this factor is to refer to the subject's propensity for violence known to the officer. The officer may base his or her assessment of the subject's propensity for violence on the officer's personal knowledge, information provided by other officers, victim, client, or other reliable channels. As is often the case, however, an officer may not know anything about the subject.

Time translates into the speed or intensity with which a subject can deliver force or use a weapon against an officer(s) and/or citizen(s). Stated another way, the less time that a subject requires to deliver force, the faster or more dangerous the subject becomes.

2.7.7 Conditions and Criteria for the Use of Deadly Force

To protect oneself or another person from what is reasonably believed to be an imminent threat of serious bodily harm or death.

Criteria that must be present for an officer to stop a subject's imminent threat by the use of deadly force are as follows:

- When the officer reasonably believes, based upon facts obtained, that the subject has the *ability* and *opportunity* to place the officer or another person in *imminent threat* of serious bodily harm or death; each of these elements is expressly linked to the other.
- The objective principles of reasonableness, totality of the circumstances, mental preparation, and factual articulation enable the officer to make timely and reasonable judgments that support the paramount consideration of safety for the officer and the general public.
- The legal standard of reasonableness does not require personnel to select the least intrusive alternative, exhaust all options, or use all feasible alternatives; only a legally reasonable one. Officers will not use deadly force to protect themselves or others from bodily injury assaults that are not likely to result in serious bodily harm or death.

2.7.8 Justification for the Use of Force

Justification for the use of deadly force should be what reasonably appear to be facts known or perceived at the time the officer decided to shoot. Facts unknown to an officer, no matter how compelling, cannot be considered at a later time to justify a shooting. Facts perceived by the officer are those imminent facts known in the here and now, when the officer makes his or her decision to shoot to stop the action or neutralize the situation.

2.7.9 Using Firearms from Moving Vehicles

Personnel shall not use firearms to fire at or from moving vehicles.

2.7.10 Fleeing Subjects

Personnel shall not fire at a subject if they are merely running away.

2.7.11 Warning Shots

Warning shots will not be fired and are not allowed under any circumstances.

2.7.12 Unnecessarily Drawing Firearms

Unnecessarily or prematurely drawing or exhibiting a firearm limits a security officer's alternatives in controlling a situation, creates unnecessary anxiety on the part of citizens in the immediate area, and may result in an unwarranted or negligent discharge of the firearm. Officers shall not draw or exhibit firearms unless circumstances surrounding the incident create a reasonable belief that it may be necessary to use that level of defense in conformance with this policy.

Those officers who unnecessarily or prematurely draw or exhibit a firearm could be subject to revocation of their firearms qualification (FAQ) status, progressive disciplinary action up to and including termination of employment, and, in certain circumstances, criminal prosecution and civil action.

2.7.13 Carrying Firearms While Off Duty

Akal Security personnel are not authorized to use or carry Akal Security duty firearms while out of uniform or off duty, unless specified by a particular contract and authorized in writing from a local manager. Akal Security personnel are also not allowed to identify or represent themselves in a security officer role while off duty.

Nothing in this policy should be construed to prevent an employee from exercising his or her constitutional rights within federal, state, or local laws to carry a weapon as a legally armed citizen, where applicable or following applicable concealed-weapon laws while off duty.

2.7.14 Reporting the Use of a Firearm

Whenever a firearm is drawn to a show-of-force position or discharged, personnel must report the incident to his or her immediate supervisor as quickly as possible. Documentation containing factual articulation is required as to what level was used or exhibited.

An Incident Report (IR), in addition to a Use of Firearms Report, shall be accurately completed and submitted to the officer's supervisor for a review conducted by the local manager, the Akal Corporate office to possibly include the Corporate Human Resources Investigators, or a designee, as needed during a thorough review and investigation. The IR should be completed within a reasonable time frame, based upon the totality of the incident and Operations policies and local procedures.

Failing to report a firearm discharge or drawing a firearm while on duty, other than during the uploading and downloading process, will be subject to disciplinary action up to and including termination of employment of the responsible officer. A negligent discharge or any

other firearm negligence will also be subject to disciplinary action up to and including termination of employment of the responsible officer.

Akal Security takes firearm safety seriously and maintains a zero-tolerance policy for negligence with a deadly weapon. The Four Cardinal Firearms Safety Rules (refer to section 2.7.1) will always be followed and obeyed because overall safety is paramount. Violations of the Four Cardinal Rules of Firearms Safety will be subject to disciplinary action up to and including termination of employment.

2.7.15 Use of Deadly Force on Animals

Officers may use deadly force on animals in self-defense or in the defense of another person, in order to prevent serious bodily injury or death. However, this is not meant to supersede prevailing laws, regulations, and principals of safety as stated in this policy.

2.7.16 General Use of Firearms

The following general procedures apply to all situations pertaining to firearms:

- **Emergency Medical Services (EMS) notification.** When a use-of-force incident occurs in response to a subject's actions, the officer will constantly assess the individual's medical condition, if feasible, until EMS or equivalent arrives. Officers need to be aware of possible secondary threats that may be posed to themselves or other individuals and react accordingly.
- **Documentation of show-of-force or use-of-force incidents.** An IR shall be completed to accurately describe and articulate all facts known to the officer at the time force was used or displayed. The officer must submit the completed IR and a Use of Firearms Report, if applicable, to his or her supervisor for review and approval.
- **Discretion of the client.** Akal's work is entirely contractual, and, when interacting with the general public, officers represent not only Akal but the client as well. It may be the choice of the client and so specified by contract that the officer not be armed while on duty. In such cases the request of the client will be honored.
- **Professional conduct.** Armed officers shall always conduct themselves in a professional manner and shall remain aware of the possibility of facing a deadly force decision and, therefore, to make a legally reasonable response to defend themselves or others as necessary.

2.8.0 NEGLIGENCE

An act of negligence is any unreasonable action taken by a security officer that could or does result in injury, property damage, loss of business or reputation, or loss of life. An act of negligence may be considered as an omission or failure to act when the officer should have acted and that could or does result in the above consequences.

2.8.1 Reporting Acts of Negligence

No matter how serious the act of negligence or omission, failure to report will compound the problem and the results. It shall be the responsibility of the security officer involved in any act of negligence or omission—either proven or by implication—to submit a complete, written report and explanation to the site manager within a period of 24 hours from the time the situation occurred.



2.8.2 Negligence in Reporting to Public Agencies

It shall be the responsibility of each security officer to document any report received pertaining to public safety or the protection of a client or the client's property, such as fire or threat of fire (e.g., gas or smoke smell), chemical spill, dangerous person(s) at large, medical problems, dangerous animals, etc., and to document the time it was reported to the appropriate public agency (state or local police, County Sheriff, Fire, animal shelter, etc.).

It is the responsibility of the public agencies to clear such calls. Negligence in reporting to such public agencies could result in a vicarious liability for this organization and, therefore, it is the policy of this organization that communication will be maintained in documented form. It shall be the officers' responsibility to document in their Shift Logs or Incident Reports any reports received pertaining to an officer's or client's safety, public safety, or the protection of property belonging to Akal Security or others.

2.8.3 Negligence While Operating a Vehicle

Any security officer, who is considered negligent while operating a company vehicle, will forfeit the right to operate a company vehicle in the future. Patrol officers, who are found to be negligent, will be reassigned to stationary posts.

2.8.4 Negligence with a Firearm

Any security officer found to be negligent with a firearm will be immediately relieved of duty, not reassigned until a hearing has taken place with the local site manager, and will have his or her FAQ status revoked for a minimum period of 90 days with no maximum. Further, the negligent security officer may be subject to termination. Any security officer found to be negligent with other personal equipment will be relieved of duty for a minimum of three days and will not be allowed to carry such equipment until the director of Operations is satisfied that another act of negligence will not occur.

2.8.5 Negligence in Judgment or Action

Any security officer, who fails to act, acts in a negligent manner, or is proven to be intentionally derelict in the discharge of his or her responsibilities, will be required to submit to the site manager a written explanation of his or her actions. The site manager may relieve the officer of duty for up to three days. If the situation is sufficiently serious, the officer may be terminated.

2.8.6 Negligence Resulting in Injury or Death

Any security officer, whose negligence is found to result in injury or death to another person, will be immediately terminated and may be subject to prosecution and criminal charges.

2.8.7 Misconduct Resulting in Bodily Harm

Any security officer, whose misconduct is found to have resulted in serious bodily injury and/or death to another person, may be immediately terminated and could be subject to prosecution on civil and criminal charges.

2.9.0 Discipline, Grievances, and Chain of Command

To best maintain uniformity and consistency throughout the organization, it is necessary that procedures be established to fairly enforce company policies, that personnel know and understand the penalties for infractions, and that there is a procedure for airing grievances, so personnel have a fair recourse to appeal.

Akal Security policies are designed in the best interest of Akal Security and the general public, with maximum consideration given to the security officers, who must live by those policies. The policies are intended to be fair. However, in those circumstances in which personnel of Akal Security feel that the policies are not fair, or if they have other grievances about the organization or their supervisors, it is essential that a channel be available to voice those grievances. Further, no officer shall be threatened or penalized in any way by supervisory personnel for taking action to air such grievances.

2.9.1 Infractions and Disciplinary Action

Any security officer, who has committed a violation or infraction of the policies contained herein, is subject to disciplinary action. Disciplinary action may vary from a written warning to termination of employment. The degree of action will vary with the extent of the violation.

2.9.2 Chain of Command

In all disciplinary actions and in hearing of all grievances, the chain of command will be followed. No security officer may be disciplined except by a ranking officer, who is in the chain of command directly above that officer. Similarly, when officers have grievances, those grievances must be presented to supervisors directly above the officers. Akal Security's chain of command is as follows:



2.9.3 Grievance Procedure

All Akal Security supervisory personnel have the responsibility to hear the grievances of those for whom they are responsible. Security officers, who have grievances, must submit their grievances, in writing, to their immediate supervisors; Officer Feedback forms (HR Form 3.7) are available for this purpose. Written grievances shall include the nature of the complaint and a statement describing the action the security officer would like to see taken.

The immediate supervisor is responsible for providing a written response to the grievance. If the immediate supervisor is unable to resolve the issue, the security officer may appeal the grievance, in writing, with the supervisor's response in writing to the next officer in the Chain of Command. The appeal may be continued up to and including the regional manager, if the grievance is not resolved. In all circumstances, the final determination of the regional manager is final and binding.

Grievances of a harassment nature must be reported to the office manager. If the officer's local command staff is part of the problem, the grievance should be reported directly to the Corporate Office of Human Resources.

NOTES