



STANDARD OPERATING PROCEDURES & GENERAL ORDERS

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COVENANT
PROTECTION
WITH INTEGRITY



INTRODUCTION

As an employee of the CPI Security Corp. it is your responsibility to read and become familiar with these Standard Operating Procedures.

The CEO has the authority to amend or revoke any Standard Operating Procedure and to create any additional Standard Operating Procedures from time to time, as the circumstances for the good of the Company may require.

Employees subject to these Standard Operating Procedures must understand that, no set Standard Operating Procedure can be established which would completely cover all cases arising in the discharge of their duties. Necessarily, some matters must be left to the intelligence and discretion of the individual.

However, it must be understood if discretion is used in a reckless or unreasonable manner, which is determined to be detrimental to the image of CPI Security Corp. or its Clients and which sound public opinion recognizes as injurious to the ability of the Company to serve its Clients, that individual who violates or attempts to violate these Standard Operating Procedures will be subject to Disciplinary Action, up to and including Termination from CPI Security Corp.



CODE OF ETHICS

In recognition of the significant contribution of the Company to Crime Prevention and Reduction, as an Officer, I pledge:

To accept the responsibilities and fulfill the obligation of my role: protecting life and property; preventing and reducing crimes against CPI Security Corp. and its Clients; upholding the law; and respecting the constitutional rights of persons.

To conduct myself with honesty and integrity and to adhere to the highest moral principles in the performance of my assigned duties.

To be faithful, diligent, and dependable in discharging my duties, and to uphold at all times the laws, policies, and procedures that protect the rights of others.

To observe the precepts of truth, accuracy, and prudence, without allowing personal feelings, prejudices, animosities, or friendships to influence my judgments.

To report to my Immediate Supervisor, without hesitation, any violation of the law or CPI Security Corp. or its Clients regulations.

To respect and protect the confidential and privileged information of CPI Security Corp. or its Clients beyond the term of my employment, except where their interests are contrary to law or to this Code of Ethics.

To cooperate with all recognized and responsible law enforcement and government agencies in matters within their jurisdiction.

To accept no compensation, commission, gratuity, or other advantage without the knowledge and consent of CPI Security Corp.

To conduct myself professionally at all times, and to perform my duties in a manner that reflects credit upon me, CPI Security Corp., and its Clients.

To strive continually to improve my performance by seeking training and educational opportunities that will better prepare me for my duties and responsibilities.

As a Supervisor of the Company and its Employees, I pledge:

To recognize that my principal responsibilities are, in the service of CPI Security Corp. and its Clients, to protect life and property as well as to prevent and reduce crime against CPI Security Corp., industry, or other organizations and institutions; and in the public interest, to uphold the law and to respect the constitutional rights of all persons.

To be guided by a sense of integrity, honor, justice, and morality in the conduct of business; in all personnel matters; in relationships with government agencies, CPI Security Corp., and its Clients; and in responsibilities to the general public.

To strive faithfully to render services of the highest quality and to work continuously to improve my knowledge and skills and thereby improve the overall effectiveness of CPI Security Corp.

To uphold the trust of the CPI Security Corp., its Clients, and the public by performing my functions within the law, not ordering or condoning violations of law; and ensuring that all personnel conduct their assigned duties lawfully and with proper regard for the rights of others.

To respect the reputation and practice of others in the industry, but to expose to the proper authorities any conduct that is unethical or unlawful.

To apply uniform and equitable standards of employment in recruiting and selecting personnel regardless of any protected status, and in providing salaries commensurate with job responsibilities and with training, education, and experience.

To cooperate with recognized and responsible law enforcement and other criminal justice agencies; to comply with state licensing and registration laws and other statutory requirements that pertain to CPI Security Corp.

To respect and protect the confidential and privileged information of CPI Security Corp. and its Clients beyond the term of my employment, except where their interests are contrary to law or to this Code of Ethics.

To maintain a professional posture in all business relationships with CPI Security Corp. and its Clients, with others in the industry, and with members of other professions; and to insist that all personnel adhere to the highest standards of professional conduct.

To encourage the professional advancement of all personnel by assisting them to acquire appropriate industry knowledge, education, and training.



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07-0001 GENERAL RULES & REGULATIONS

Purpose

The purpose of this Standard Operating Procedure is to establish the General Rules & Regulations.

Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp. to have employees become familiar with the following Rules & Regulations. The procedures below give a definitive course of action for all employees to follow.

Procedure

A. GENERAL COMPANY RULES

01. All employees shall follow the Chain of Command. Those employees who have attained Administrative, Managerial, and/or Supervisory Positions are entitled to the respect and cooperation from all employees of the Company.
02. All employees shall treat each other and the public with respect.
03. Duties and responsibilities of each position as established will remain in effect. Position titles and duties may be changed only through the authorization of the CEO.
04. Employees shall keep all Company and/or Client Owned Vehicles, Equipment, and Facilities clean and in proper order at all times.
05. Any employee injured while on duty will notify their Immediate Supervisor or Senior Officer In Charge as soon as possible.
06. Employees may not borrow any Company and/or Client Owned Vehicles and/or Equipment without prior approval from their Immediate Supervisor.
07. Employees may not make a purchase on behalf of the Company and/or Client without prior approval from their Immediate Supervisor.

08. All employees shall take appropriate action to aid a fellow employee exposed to danger.
09. Employees shall not terminate or walk away from an assigned duty, post, or position unless properly relieved.
10. Employees shall not possess Company and/or Client Owned Equipment not assigned to oneself.
11. All employees shall give full attention to their duty performance. Failure to give suitable attention will be considered Neglect of Duty. Examples include, but are not necessarily limited to the following:
 - A. Failure to take appropriate action regarding any occasion deserving attention from the Company;
 - B. Unnecessary absence from one's assignment while on duty;
 - C. Failure to perform duties or failure to comply with all Standard Operating Guidelines, Rules, Regulations, General and Special Orders, Written or Verbal Orders.
12. All employees shall report in writing a fellow employee's violation of a Law, Standard Operating Guideline, Rule, Regulation, General and Special Order, and Written or Verbal Order. All such violations shall be reported to the proper Chain of Command.
13. Insubordination which shall include, but not necessarily be limited to the following:
 - A. Any failure or deliberate refusal to obey a lawful order given by an Immediate Supervisor or Senior Officer In Charge;
 - B. Any disrespectful, mutinous, insolent, abusive language or action toward any employee in or out of their presence.



14. Employees in violation of these General Rules & Regulations will be subject to Disciplinary Action, up to and including Termination from the Company.

B. RULES OF CONDUCT

01. All Employees shall conduct themselves in a manner that is a credit to themselves and the Company.
02. Employees shall work together for the betterment of the Company. Employees who cause internal strife, dissension, infighting, or who are unable to work within the Company harmoniously will be Terminated.
03. Employees shall refrain from unnecessary shouting or using obscene language.
04. Employees shall not display a lack of courtesy to an individual on the phone or in person at anytime.
05. Employees in violation of these General Rules & Regulations will be subject to Disciplinary Action, up to and including Termination from the Company.

C. RULES OF COMPLIANCE

01. All employees shall follow all Local, County, State, and Federal Laws.
02. No employee shall use their position to seek or gain influence from a Local, County, State, or Federal Employee, who is attempting to do their duty.
03. No employee shall use their position for any political or unlawful purpose.
04. All employees shall carry their Company Identification Card, State issued Driver's License, and State Gun Permit, if applicable, on them at all times while on duty. No Company Identification shall be openly displayed unless conducting Official Company Business.

05. Employees who are repeatedly in violation of traffic laws, disorderly conduct, driving under the influence, or any misdemeanors, or who are arrested on any felony charges, shall be subject to Disciplinary Action, up to and including Termination from the Company.
06. Employees shall seek information from an Immediate Supervisor or Senior Officer In Charge when in doubt as to the nature or detail of an assignment.
07. Employees shall maintain a working knowledge of all Rules, Regulations, Standard Operating Guidelines, Special or Written Orders, and Laws that pertain to the Company.
08. Any employee receiving an unlawful, unjust, or improper order shall report this fact to their Immediate Supervisor or Senior Officer In Charge.
09. All employees shall wear the proper uniform and/or carry all necessary equipment and maintain them in good order at all times.
10. Upon receipt of an order conflicting with any previous order or instruction, the employee affected shall advise their Immediate Supervisor or Senior Officer In Charge issuing the second order of this fact. Responsibility for countermanding the original order or instruction then rests with the Immediate Supervisor or Senior Officer In Charge issuing the second order. If so directed, the second order shall be obeyed first. Orders will be countermanded or conflicting orders will be issued only when necessary for the good of the Company.
11. No employee shall withhold from any Law Enforcement Official any information of criminal activity or failure to cooperate fully with any Investigation, as long as not to violate one's Federal or State Constitutional Rights.
12. Employees in violation of these General Rules & Regulations will be subject to Disciplinary Action, up to and including Termination from the Company.



D. RELEASE OF INFORMATION AND EMPLOYEE FILES

01. All employees shall be prohibited from communicating matters of a confidential nature to any person outside the Company.
02. Employees shall not release any information to the General Public or Members of the Media without prior approval from their Immediate Supervisor.
03. Employees in violation of these Standard Operating Guidelines will be subject to Disciplinary Action, up to and including Termination from the Company.

The Company shall collect some basic information about each employee. However, to protect the employee, only information necessary for administrative or legal purposes will be collected.

01. All employees shall submit a copy of their Birth Certificate, Social Security Card, High School Diploma or GED, State issued Driver's License, and State Gun Permit, if applicable.
02. All employees shall inform their Immediate Supervisor within 24 hours of any telephone or address change.
03. All employees are required to keep their personal information current and up to date.
04. Employees in violation of these General Rules & Regulations will be subject to Disciplinary Action, up to and including Termination from the Company.

E. DISCIPLINARY ACTION

All employees shall be treated equally and fairly during any Disciplinary Action. It is expected that each and every employee of the Company follow all Standard Operating Procedures, Rules, Regulations, General and Special Orders, and Written or Verbal Orders. The following are the procedures that are exercised whenever Disciplinary Actions must be taken. The Employee Relations Department reserves the right to skip certain Disciplinary Actions if a particular situation

warrants such action, or if it is deemed necessary for the good of the Company.

01. A Verbal Warning shall be given to the affected employee(s);
02. A Written Warning shall be given to the affected employee(s);
03. An Un-Paid 01 to 03-day Suspension shall be given to the affected employee(s);
04. The final step shall be Termination from the Company.

Terminated Employees must return all applicable Company Uniforms, Identification, Equipment, Etc. within 48 hours of their resignation. The President/CEO reserves the rights to have Terminated Employees return all Company Property sooner if a particular situation warrants such action.

07-0002 HARASSMENT & SEXUAL HARASSMENT

Purpose

The purpose of this Standard Operating Procedure is to establish CPI Security Corp. stance concerning Harassment and Sexual Harassment of employees.

Standard Operating Procedure

It is the Standard Operating Guideline of CPI Security Corp to maintain a Zero Tolerance for any form of Harassment or Sexual Harassment of employees. The procedures below give a definitive course of action for all employees to follow.

Procedure

A. DEFINITION OF HARASSMENT

Harassment occurs when an employee is subjected to unwelcome verbal or physical conduct because of race, color, religion, gender, sexual orientation, disability, age, national origin, ancestry, citizenship, marital status, military service, unfavorable military discharge, or any other protected status. Our Company prohibits Harassment in the workplace on these grounds.



Examples of Harassment which will not be tolerated are: verbal or physical abuse, threats, derogatory remarks, jokes, innuendos or taunts about any employee's race, color, religion, gender, sexual orientation, disability, age, national origin, ancestry, citizenship, marital status, military service, unfavorable military discharge, or any other protected status. Our Company also will not tolerate the display of pornographic, racist, offensive, signs or images; practical jokes that result in awkwardness or embarrassment; unwelcome invitations or requests, whether indirect or explicit.

B. DEFINITION OF SEXUAL HARASSMENT

Sexual Harassment, being discrimination on the grounds of gender, is a violation of law. Unwanted sexual advances, unwanted requests for sexual favors, and other unwanted verbal or physical conduct of a sexual nature constitute Sexual Harassment when:

01. Submission to such conduct is made either explicitly or implicitly a term of, or condition of, an individual's employment; or
02. Submission to, or rejection of, such conduct by an individual affects that individual's employment.

Sexual Harassment can include such things as pinching, patting, rubbing, leering, "dirty jokes", pictures or pornographic materials, comments, suggestions, innuendoes, requests, or demands of a sexual nature. The behavior need not be intentional in order to be considered Sexual Harassment.

C. FILING A COMPLAINT

If you are being harassed:

01. Tell the harasser his/her behavior is unwelcome and ask him/her to stop;
02. Keep a record of the incidents (dates, times, locations, possible witnesses, what happened, your response). You do not have to keep a record of the incidents in order to file a complaint, but a record can strengthen your case and can help you remember details over time;

File a complaint. If, after asking the harasser to stop his/her behavior, the Harassment continues, report the problem to one of the following individuals:

01. Your Immediate Supervisor or;
02. Chief Administrator Officer (CAO).

D. HANDLING OF COMPLAINTS

01. Once a complaint is received, it will be kept strictly confidential. An investigation will be undertaken immediately and all necessary steps taken to resolve the problem, if appropriate, will be implemented;
02. Both the complainant and the alleged harasser will be interviewed, as will any individuals who may be able to provide relevant information. All information will be kept in confidence;
03. If the investigation reveals evidence to support the complaint of Harassment, the harasser will be disciplined appropriately. Discipline may include Immediate Suspension or Termination from the Company and the incident will be documented in the harasser's file when the complaint is filed in good faith, whether the complaint is upheld or not;
04. If the investigation fails to find evidence to support the complaint, there will be no documentation concerning the complaint placed in the file of the alleged harasser;
05. Regardless of the outcome of the Harassment Complaint made in good faith, the employee lodging the complaint, as well as anyone providing information will be protected from any retaliation by either other employees or Supervisors. This includes termination, demotion, unwanted transfer, denial of opportunities within the Company, and/or Harassment of an individual as a result of his/her having made a complaint and/or having provided evidence regarding the complaint.



E. RESPONSIBILITY OF MANAGEMENT

It is the Responsibility of Management or any person within this Company Supervising one or more employees to take immediate and appropriate action to report or deal with incidents of Harassment of any type, whether brought to their attention or personally observed. Under no circumstance should a legitimate complaint be dismissed or downplayed, nor should the complainant be told to deal with it personally. The Company seeks to provide a safe, healthy, and rewarding employment environment for its employees. **Harassment will not be tolerated within the Company!**

07-0003 ILLEGAL DRUGS & ALCOHOL ABUSE

▼ Purpose

The purpose of this Standard Operating Procedure is to establish CPI Security Corp. stance on Illegal Drugs and/or Alcohol Abuse by employees.

▼ Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp. to maintain a Zero Tolerance for Illegal Drugs and/or Alcohol Abuse by employees. The procedures below give a definitive course of action for all employees to follow.

▼ Procedure

A. ILLEGAL DRUGS AND/OR ALCOHOL ABUSE

Illegal Drugs and/or Alcohol Abuse have an adverse impact on an employee's performance, personal and family life, as well as the ability to provide the highest quality of service. Illegal Drugs and/or Alcohol Abuse can cause poor performance, decreased productivity, and create safety hazards. Consequently, the Company is committed to establishing and maintaining an environment free of Illegal Drugs and/or Alcohol Abuse.

Also, the Company is committed to providing a safe employment environment and to fostering the well being and health of our employees. That commitment is jeopardized when any employee uses Illegal Drugs and/or Alcohol, report for duty with these substances present in his/her body, or possesses, distributes, or sells Illegal

Drugs and/or Alcohol. Therefore, the Company has established the following:

01. It is a violation of this Company Standard Operating Guideline for any employee to possess, sell, trade, or offer for sale Illegal Drugs and/or Alcohol or otherwise engage in the use of Illegal Drugs and/or Alcohol on duty;
02. It is a violation of this Company Standard Operating Guideline for any employee to report for duty under the influence of Illegal Drugs and/or Alcohol or with Illegal Drugs and/or Alcohol in his/her body;
03. It is a violation of this Company Standard Operating Guideline for any employee to use prescription drugs illegally. (However, nothing in this Standard Operating Guideline precludes the appropriate use of legally prescribed medication);
04. Employees who violate this Standard Operating Guideline are subject to Disciplinary Action, up to and including Termination from the Company.

B. SUPERVISOR RESPONSIBILITIES

It is the responsibility of the Company's Supervisors to counsel employees whenever they see changes in performance or behavior that suggests an employee is under the influence of Illegal Drugs and/or Alcohol. Although it is not the Supervisor's responsibility to diagnose personal problems, the Supervisor should encourage such employees to seek help and advise them about available resources for getting help.

Everyone shares responsibility for maintaining a safe employment environment and co-workers should encourage anyone who uses Illegal Drugs and/or Alcohol on duty to seek help. The goal of this Standard Operating Procedure is to balance our respect for individuals with the need to maintain a safe, productive, and Illegal Drugs and/or Alcohol-Free Environment.

The intent of this Standard Operating Procedure is to offer a helping hand to those who need it, while sending a clear message that Illegal Drugs and/or Alcohol are



incompatible with employment within the Company. The Company has adopted testing practices to identify employees who use Illegal Drugs and/or Alcohol on duty. It shall be a condition of employment for all employees to submit to testing under the following circumstances:

- 01. When there is reasonable suspicion to believe that an employee is under the influence of Illegal Drugs and/or Alcohol;
- 02. When employees are involved in on duty accidents where personal injury or damage to Client and/or Company property occurs;
- 03. When employees are involved in an on duty shooting, whether justified or not.
- 04. As part of a Follow-Up Program for the treatment of Illegal Drugs and/or Alcohol Abuse.

07-0004 CHAIN OF COMMAND

Purpose

The purpose of this Standard Operating Procedure is to establish CPI Security Corp. Chain of Command.

Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp to have all employees understand and follow the Chain of Command. The procedures below give a definitive course of action for all employees to follow.

Procedure

In order for all employees to become familiar with the Chain of Command within the Company, the following position designations have been outlined below.

A. ADMINISTRATIVE PERSONNEL

- 01. Position: CEO
- 02. Position: Chief Administrative Officer
- 03. Position: Chief Operations Officer

B. SUPERVISORY PERSONNEL

- 01. Position: Captain(s)
- 02. Position: Post Supervisor(s)
- 03. Position: Shift Supervisor(s)

C. SUBORDINATE PERSONNEL

- 01. Position: Security Officer(s) (Full-Time)
- 02. Position: Security Officer(s) (Part-Time)

D. SENIORITY PROCEDURES

When you are on shift and there is no Immediate Supervisor available, the most Senior Employee shall assume command of said shift. The most Senior Employee assuming command of the shift shall be in a Supervisory Role until relieved by an Administrative, Managerial, and/or Supervisory Employee. The most Senior Employee shall when possible make all attempts to contact an Administrative, Managerial, and/or Supervisory Employee to advise them of any emergency situations or irregularities.

Subordinate Positions shall generally not exercise supervision over shift activities or other personnel unless directed otherwise by an Administrative, Managerial, and/or Supervisory Employee. An employee or member of another organization shall at no time assume command of the Company. However, when necessary for the benefit of the Company and/or Client, employees or members of other organizations may be integrated into the Command Structure of the Company and/or Client Site Location during an emergency situation.

07-0005 PROBATIONARY PERIOD

Purpose

The purpose of this Standard Operating Procedure is to establish the Probationary Period for all newly selected employees of CPI Security Corp.



▼ Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp to place all newly selected employees on a 90 Day Probationary Period. The procedures below give a definitive course of action for all employees to follow.

▼ Procedure

A. PROBATIONARY PERIOD

The Probationary Period is intended to provide a period of time in which a newly selected employee may be trained to at least a minimum level to provide beneficial service to the Company and Client.

The Probationary Period provides both the new employee and the Company an opportunity to determine if the new employee is suitable for continued employment with the Company or if the responsibilities of employment are acceptable to the new employee.

B. PROBATION EXTENTION

The Immediate Supervisor at their discretion may extend the Probationary Period if it is deemed to be in the best interest of the Company. Any employee may be Terminated without notice or recourse while on their Probationary Period.

▼ 07-0006 TRAINING REQUIREMENTS

▼ Purpose

The purpose of this Standard Operating Guideline is to establish the Training Requirements for all employees.

▼ Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp. to train all newly selected employees and re-certify current employees bi-annually and annually. The procedures below give a definitive course of action for all employees to follow.

▼ Procedure

A. GENERAL PROCEDURES

01. All employees must complete and pass the minimum Training Requirements set forth by the Company prior to being released for duty.

02. This Standard Operating Procedure may be changed as needed either in writing or verbally by the CEO as seen fit for the good of the Company.

B. MANDATORY TRAINING COURSES

Employees shall be trained consistently and in such a manner to enable them to provide beneficial service to the Company and Client.

C. OTHER REQUIRED TRAINING

The CEO and/or specific Client Site Location Client/ Company Service Agreement may prescribe other required training from time to time as may be appropriate.

▼ 07-0007 MEETINGS

▼ Purpose

The purpose of this Standard Operating Guideline is to establish the procedures for conducting all Meetings.

▼ Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp. to conduct Meetings in order to keep all employees current and informed concerning Company Operations. The procedures below give a definitive course of action for all employees to follow.

▼ Procedure

A. MEETING LOCATION

Meetings shall be held at such a place, time, and frequency as the Company shall determine. All employees are expected to attend all Regular and Special Meetings. Employees who were unable to attend a Regular or Special Meeting shall contact their Immediate Supervisor as soon as possible to obtain the information discussed.

B. SPECIAL MEETINGS

The Company may call Special Meetings if it is deemed necessary for the good of the Company. Employees will be notified at least 48 hours in advance, if possible, including the date, time, and location of the Special Meeting and the business to be transacted. Only the business specified shall be transacted at the Special Meeting.



C. MEETING TIME

All Meetings are to begin promptly at the designated time and place and should be of sufficient length to transact all necessary business.

D. CHANGE OF ORDER

The Company may change the order of business when it is deemed necessary for the good of the Company.

07-0008 AUTHORIZED BREAK PERIODS

Purpose

The purpose of this Standard Operating Procedure is to establish the appropriate procedures for Authorized Break Periods for all employees.

Standard Operating Procedure

It is the Standard Operating Procedure of t CPI Security Corp. to allow employees to take Authorized Break Periods. The procedures below give a definitive course of action for all employees to follow.

Procedure

A. AUTHORIZED BREAK PERIODS

Employees on an Authorized Break Period must:

01. Maintain an on-duty status by remaining in radio contact, if applicable, and if appropriate, providing a telephone number, remain in uniform, and are not permitted to sleep.
02. At least one employee will remain on duty while other employees are taking their Authorized Break Periods;
03. No Authorized Break Period may be scheduled for the first hour or the last hour of a particular shift;
04. Desk Personnel may take an Authorized Break Period **AWAY** from the desk, **ONLY** if there are competent and authorized employees available to relieve them at the desk.

07-0009 SLEEPING ON DUTY & BREAKS

Purpose

The purpose of this Standard Operating Guideline is to establish the Company's stance on employees Sleeping On Duty & Breaks.

Standard Operating Procedure

It is the Standard Operating Guideline of CPI Security Corp to prohibit employees from Sleeping On Duty & Breaks. The procedures below give a definitive course of action for all employees to follow.

Procedure

A. EMPLOYEE SAFETY

In the interest of Employee Safety, all employees are required to respond and assist fellow employees and others. This is true even when they are on a break or lunch. The employee will return to their break or lunch after the situation has been resolved.

Since the safety of fellow employees and others are involved, the Company will not permit employees to sleep on their breaks, lunches, or while assigned to duty. This is an Employee and Client Safety Issue.

It is the employee's responsibility to perform their duties in a manner that they should always be alert and awake with their head up and eyes open. Employee's who appear to be sleeping will be considered as sleeping if they are found with their heads down, eyes closed, or unresponsive to the presence of others.

B. DISCIPLINARY ACTION

Employees found sleeping on breaks, lunches, or on duty will be considered Gross Misconduct and will result in Immediate Termination from the Company.

07-0010 SMOKING ON DUTY

Purpose

The purpose of this Standard Operating Procedure is to establish the Company's stance on Smoking On Duty.



Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp. to allow employees to smoke only while on break and in Designated Smoking Areas. The procedures below give a definitive course of action for all employees to follow.

Procedure

The Company discourages its employees from Smoking On Duty. Smoking is regarded as a poor health habit and may be offensive to co-workers and customers. While the Company cannot regulate employee conduct during off duty hours, the Company feels it is responsible for providing an environment free of exposure to potentially hazardous substances and have therefore classified the Company Office as Smoke Free.

A. CLIENT SITE LOCATIONS

As nearly all of our Clients have Standard Operating Procedures regarding smoking, all employees are required to follow those Standard Operating Procedures.

B. AUTHORIZED BREAK PERIODS

It is not permissible for employees to be observed in public Smoking On Duty and/or while in uniform. This gives the appearance of being inattentive to duty. Therefore, employees must restrict their smoking to Authorized Break Periods and Designated Smoking Areas **ONLY!**

07-0011 SOLICITATION & DISTRIBUTION

Purpose

The purpose of this Standard Operating Procedure is to establish the acceptable practices of Solicitation & Distribution by employees while on duty.

Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp. to limit Solicitation & Distribution by employees. The procedures below give a definitive course of action for all employees to follow.

Procedure

A. SOLICITATION & DISTRIBUTION

Solicitation & Distribution at Client Site Locations by non-employees of the Company or Client is prohibited at all times. In addition, no Solicitation & Distribution by employees may take place while on duty.

As used in this Standard Operating Guideline, "Solicitation" refers to oral persuasion to secure an individual's agreement to join or support an endeavor or to purchase products or services, including cosmetics, cookies, candy, popcorn, etc. "Distribution" refers to the dissemination of flyers, brochures, and other written materials promoting products, services, organizations and/or causes.

The following restrictions apply when employees engage in permitted Solicitation & Distribution for any group or organization, including charitable organizations:

01. Distribution of literature in a way that causes litter is prohibited at all times.

Solicitation & Distribution is prohibited while on duty by either the employee engaging in this activity or the targeted employee. The term "On Duty" does not include Authorized Employee Break Periods.

07-0012 CIVILIAN COMPLAINTS

Purpose

The purpose of this Standard Operating Procedure is to establish procedures for the handling of Civilian Complaints.

Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp. to investigate any and all Civilian Complaints received. The procedures below give a definitive course of action for all employees to follow.



Procedure

A. CIVILIAN COMPLAINTS

The Image of the Company depends on the personal integrity and discipline of all employees. To a large degree, the public image of the Company is determined by the professional response of the Company to allegations of misconduct of employees.

The Company will:

01. Promptly conduct a thorough and impartial investigation of alleged misconduct by employees;
02. Take appropriate action in all cases when an investigation substantiates a violation of law, orders, rules, regulations, general orders, and/or Standard Operating Guidelines;
03. Seek appropriate remedy for false allegations.

Employees who are being investigated may be Suspended without pay pending the outcome of an Internal Investigation. If the employee is exonerated, they may be entitled for compensation for actual time lost.

B. INTRODUCTION

The following shall outline the procedures for investigating Civilian Complaints:

One of the many missions of the Company's Employee Relations Department is to maintain and improve our core values by working with all persons to preserve a quality of life, maintain human rights, protect property, promote individual responsibility, and ensure commitment to our Code of Ethics. To fulfill its mission, the Employee Relations Department needs to respond fairly and promptly to complaints about the Company's services and employees.

When complaints are received, the Employee Relations Manager will make an initial screening decision that determines how each of the allegations will be handled. The Employee Relations Manager's initial screening decision requires mature and experienced judgment. The following provides general principles that outline their decision-making process. The principles are not mechanical rules.

While complaints may have patterns or similarities, no two are identical. The principles of decision-making recognize that it is impractical, indeed impossible, to establish a "rule" for every circumstance. The principles expect the Employee Relations Manager to make informed judgments that are logical, rational, objective, consistent, and transparent. They acknowledge the value of swift and certain resolutions for complainants concerning Company employees.

C. SCREENING OPTIONS

When the CEO or CAO receive complaints, the initial screening options are:

01. After reviewing the employee's Supervisor's Preliminary Investigation and any other readily available evidence, the Employee Relations Manager generally will assign for a Full Investigation of the allegations which:
 - A. State a claim of disciplinable misconduct;
 - B. Have investigative merit (i.e., there is a reasonable possibility that an investigation either will sustain the allegation or exonerate the employee), and;
 - C. Are not eligible for another disposition.
02. **Investigation.** If the Administrative Personnel finds that a complaint contains credible evidence of criminal conduct by a Company employee that is not barred by the statute of limitations, the Administrative Personnel will refer the case for criminal investigation to the responsible law enforcement jurisdiction. Said employee will immediately be Suspended, without pay, pending Termination by the CEO. Those complaints not amounting to criminality shall be handled at the discretion of the Administration Personnel, consistent with this section.
03. **Customer Service Complaint.** If the Administrative Personnel finds that the complaint contains allegations that meet Company standards for being handled as a Customer Service



Complaint, the Administrative Personnel may decline to investigate and forward the complaint to the appropriate Supervisor as a Customer Service Complaint.

04. **Mediation.** If a complaint is referred to the Administrative Personnel for possible Mediation and the CEO concludes that Mediation will meet the needs of the Company and the complainant, the Administrative Personnel may offer the Mediation option to the involved employee through his or her Supervisor.

05. **Decline.** The Administrative Personnel may Decline to investigate some or all of the allegations in a complaint under the following circumstances:

A. **No Misconduct.** The Administrative Personnel may decline to assign a Full Investigation and take no further action if the Administrative Personnel finds that the employee's conduct, as alleged by the complainant, does not violate Company Standard Operating Procedures.

B. **Trivial Rule Violation.** The Administrative Personnel may decline to assign a Full Investigation and take no further action or refer the complaint to the appropriate Supervisor for an informal briefing, if the Administrative Personnel finds that the employee's conduct, as alleged by the complainant, constitutes a minor technical violation that if sustained would not result in discipline and is too minor or too vague to justify a Customer Service Complaint.

C. **Unidentifiable Employee.** The Administrative Personnel may decline to assign a Full Investigation and take no further action if the Administrative Personnel finds that a reasonable investigative effort would not be able to identify the employee mentioned in the complaint.

D. **Previously Investigated or Adjudicated.** The Administrative Personnel may decline to assign a Full Investigation and take no further action

if the Administrative Personnel finds that the alleged conduct was previously Investigated or Adjudicated by the Company and that the current complaint does not provide substantial new evidence.

E. **Lacks Investigative Merit.** The Administrative Personnel may decline to assign a Full Investigation and take no further action based on the preliminary investigation if:

01. The Administrative Personnel finds that there is no reasonable possibility that a Full Investigation either will sustain the allegation; or

02. The Administrative Personnel articulates specific reasons why the complaint is not credible or reliable.

D. EVALUATING PRELIMINARY INVESTIGATIONS

The Administrative Personnel's initial screening decisions are based in part on their evaluation of the evidence gathered during the Preliminary Investigation, other available evidence, and the Administrative Personnel's assessment of the Company's ability to successfully investigate the complaint. successfully investigate the complaint.

01. **Evidentiary Guidance.** The Administrative Personnel will evaluate complaints using standard evidentiary principles and the guidance described below:

A. The Administrative Personnel may consider a witness's credibility. Complainants, employees, and other witnesses are presumed to be truthful, but the presumption may be overcome by contradictory evidence or circumstances, or evidence of bias, self-interest, or past untruthfulness;

B. The Administrative Personnel may consider a witness's reliability, i.e., the witness's ability to observe, remember, and report an incident. For example, was the witness in a



position to observe the incident? Was the witness under the influence of an intoxicant at the time of the incident or the time of the complaint?

- C. The Administrative Personnel may consider the internal logic and probability of a witness's statement for the effect it has on the witness's credibility and reliability. The Administrative Personnel is not bound to accept as true statements that are highly improbable or illogical on their face value;
- D. The Administrative Personnel may give greater weight to information that is corroborated by independent witnesses or by physical evidence.

E. REPORTING

Upon completion of the investigation or other remedy thereof, the Administrative Personnel shall furnish the complainant with the results of the case. In no circumstances will Company employee's personal information be released to any complainant unless governmental regulations or law requires said information for governmental administration.

07-0013 PERFORMANCE EVALUATIONS

▼ Purpose

The purpose of this Standard Operating Procedure is to establish a Performance Evaluation Program for the CPI Security Corp.

▼ Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp. to conduct Performance Evaluations on all Company employees. The procedures below give a definitive course of action for all employees to follow.

▼ Procedure

A. GENERAL OVERVIEW

The Performance Evaluation Program has been created in order to provide feedback to employees concerning their employment performance and to enable the

Company to adjust the Training Programs according to needs identified through the Performance Evaluation Program.

Evaluating performance of employees is a critical element of the role of a Supervisor. Supervisors will evaluate their employees' performance whether or not a formal system exists. The intent of the Company is to provide a mechanism whereby Supervisors will periodically conduct formal evaluations of their employees in a systematic manner that provides appropriate feedback to those employees regarding their employment performance, as well as to enhance the Company's In-Service Training Requirements.

It is the Standard Operating Procedure of the Company to conduct a Quarterly Evaluation of all employees. Evaluations will be conducted by each employee's Immediate Supervisor. Each Supervisor will use the appropriate criteria/guidelines for the employee being evaluated. Criteria/guidelines for employees will be used to evaluate employee performance.

Completed evaluations will be maintained by the Employee Relations Department. The objective of the Performance Evaluation Program is to improve overall Company performance through the objective and fair evaluation of employees in a manner designed to encourage employees to perform at their highest level and to grow in their positions.

B. PERFORMANCE EVALUATION PROGRAM

01. A Quarterly Evaluation will be submitted on every employee. The evaluation of an employee is a continuous process.
02. Supervisors will schedule time with each employee being evaluated to allow for counseling by the Supervisor and to discuss the evaluation process between the Supervisor and employee. It is the responsibility of Supervisors to inform and counsel their employees at the beginning of the evaluation period of the following:

- A. Tasks of the employee's position, and;



- B. Performance expectations of the Supervisor and the evaluation criteria to be applied.

This counseling should be directed at providing each employee with the information needed to fully understand the specific duties and responsibilities assigned to them during the evaluation period, in order to maintain appropriate behavior and eliminate inappropriate behavior.

03. Upon completion of the evaluation/counseling meeting between the Supervisor and employee, the employee must sign his or her evaluation form. The signature does not indicate agreement or disagreement with the evaluation. The signature indicates only that the Supervisor and employee have discussed the evaluation. A copy of the Evaluation Report will be provided to any employee who requests it.

04. Disputed evaluations. If an employee disagrees with his or her evaluation, the employee can submit a Written Statement to the Employee Relations Manager within five (5) days of the evaluation/counseling meeting. The Written Statement will specify the category and reason for the disagreement. The Employee Relations Manager will investigate the circumstances of the disagreement and notify the employee and Supervisor of their decision, in writing, when possible within five (5) days of receipt of the Written Statement from the employee.

05. Each Supervisor must read Section C of this Standard Operating Procedure, Guidelines for Performance Evaluations, prior to evaluating employees. It discusses the evaluation process, including evaluation errors that can affect the Performance Evaluation.

06. Completed evaluations will be forwarded by the Supervisor conducting the evaluation to the Administrative Personnel who will review the evaluations to ensure the uniform application of the criteria by Supervisors, to check for the possibility of the influence of evaluation errors, to

assist in the Administrative Personnel's evaluation of subordinate Supervisors, and to identify training needs. Upon review of the evaluations the Administrative Personnel will sign each evaluation and forward recommendations for future training to the CEO.

07. The CEO will evaluate Administrative and Managerial Employees and may direct the evaluation of any employee at anytime.

08. Supervisors are encouraged to include explanatory comments in their evaluations, describing specific performance or behavior considered above standard. When an employee receives a below standard evaluation, Supervisors must include such comments, as well as documenting actions or goals suggested or agreed upon to improve performance.

C. GUIDELINES FOR PERFORMANCE EVALUATIONS

The competence of the Supervisors and the effort and time they expend in observing and recording evidence in regard to an employee's performance establishes the climate and credibility for the entire system. Accordingly, it becomes an absolute necessity to train the Supervisors to ensure uniform understanding of the system and a consistent application in the actual evaluation. It is important that everyone realize that no matter what evaluation system is used, total objectivity is unobtainable; the human element is ever present and must be dealt with.

The success and acceptance of any performance evaluation system depend on the quality of the Supervisor. If properly used, the evaluation procedure becomes an effective managerial tool as well as an employee motivator. If used improperly, the performance evaluation breeds contempt, lowers morale, and decreases the total effectiveness of the entire Company.

The Supervisor is the key figure in the evaluation system since his/her job most closely involves the effectiveness and traits of the assigned employee. He or she should however, seek input from other Supervisors and/or Superiors. In order to accomplish



this task, the Supervisor must continuously collect and record information concerning the quality and quantity of service being rendered. This can be a facet of the job that Supervisors do not seem to do willingly and it must continuously be monitored if the program is to be effective. Monitoring will be conducted by Supervisors at all levels.

Performance Evaluations of employees, if it is to be objective and accurate is a time-consuming task requiring a constant effort from the Supervisor. It is not only the most time consuming task for a Supervisor, it is the most important one. The time and effort expended, however, will benefit the Supervisor, the employee, and the Company.

D. COMMON FAULTS OF SUPERVISORS

In order to have a truly accurate Performance Evaluation, the Supervisor who is doing the evaluation must have certain attributes. The Supervisor is the key person within the Company's Performance Evaluation System. The burden for the success or failure rests entirely on the Supervisor and how well he or she is able to objectively and fairly evaluate employees.

The Supervisor must first recognize that one of the most important factors leading to a successful completion of an evaluation on an employee is time. The Supervisor must use the time between each interview of his/her employees and the actual preparation of the final evaluation for documentation. In effect what this does is to ensure that the evaluation of the employee is a continuing process which begins on the first day on duty and continues through preparation of the evaluation.

There can be no greater task than for a Supervisor to have to prepare an evaluation on several of his/her employees as the deadline approaches for its submission and the Supervisor has failed to properly evaluate and document their performance throughout the year. This is a common problem and it is not only unfair to the employee being evaluated, but it is equally unfair to the Company.

Evaluation of employees is a difficult task at best; however, the rewards for an objective and fair Supervisor outweigh the problems he or she encounters. In order

to obtain the highest degree of objectivity the Supervisor evaluating his/her employees must be aware of forces acting upon him/her as an individual which might preclude him/her from being fair and objective in this task.

The following problem areas have been identified as significant in that they are most common in evaluating employees. The first step in correcting any one of the errors listed is for the Supervisor to first recognize that he or she has a problem in a given area and then he or she must take steps to handle the problem area.

01. Halo Effect

This commonly occurs when the employee being evaluated is viewed in regards to a single element such as personal appearance. If an employee is outstanding in personal appearance, the halo effect comes into play when the Supervisor carries the other categories with the rating system as equally outstanding. In other words, one category overshadows all of the others. This tendency also occurs in the reverse when an employee is evaluated poorly in a single category.

Remedy - Each employee is to be evaluated based upon his/her performance in relationship to his/her peers, his/her experience, and his/her capabilities.

02. Constant Error

Some Supervisors evaluate their employees high even though they do not actually deserve the rating. Conversely other Supervisors consistently evaluate their employees below what the employee actually deserves.

Remedy - Each employee is to be evaluated based upon his/her performance in relationship to his/her peers, his/her experience, and his/her capabilities.

03. The Error of Recency or Over Weighing

This occurs when too much weight is placed on an employee's behavior immediately prior to an evaluation deadline.

Remedy - Recency Error can only be countered by Supervisors keeping adequate records throughout the evaluation period.



04. The Error of Central Tendency

This error is common where the Supervisor is risk oriented and refuses even when appropriate to use the extreme ends of the scale.

Remedy - The Supervisor must be able to recognize superior performance and unsatisfactory performance. There is no excuse for everyone in the middle and in fact your documentation and records will support this.

05. Leniency

There is a strong tendency for all Supervisors to be overly lenient especially with poor or marginal employees. This might work for a time, but eventually the message becomes clear that it only takes minimal effort to succeed. This is unfair to the consistent dedicated employees and the marginal employees.

Remedy - The Supervisor must be willing to evaluate an employee on the basis of what that employee actually does. The Supervisor should constantly be mindful of the need for justification of an evaluation called for either by a Supervisor or by the employee being evaluated.

06. Indifference

The Supervisor has no regard for the evaluation system and therefore evaluates passively and the employees suffer since all are usually lumped together.

Remedy - Evaluate according to actual duties performed with input from other Supervisors. Realization of the fact that an employee's career could very well be determined by the evaluation he or she receives can help correct this common error.

07. Bias

The Supervisor possesses an inherent dislike for the employee, his/her mannerisms, etc.

Remedy - The Supervisor must first recognize his/her Bias and then be willing to put it aside for the betterment of all concerned. The Supervisor must objectively view the employee with assistance from other Supervisors. Conference Evaluations tend to eliminate Individual Bias.

08. Carbon Copying

A common error with Supervisors in other organizations where an evaluation system has been in place - Supervisors tend to copy evaluations from the prior evaluation.

Remedy - The Supervisor must first recognize that this shortcut method not only is not objective, but it can hurt the employee, the Company, and the Supervisor themselves. The Supervisor's Supervisor will ensure that this practice does not occur and any evidence thereof will be documented and reflect on the Supervisor's own Performance Evaluation.

09. False Development

An error whereby Supervisors feel that if they raise their employee's evaluation a little each time, it indicates that the Supervisor is properly "Developing" their employees.

Remedy - The Supervisor must first recognize that this is erroneous and unacceptable and as in "Carbon Copying" the results can reflect poorly on the employee, the Company, and the Supervisor. The Supervisor's Supervisor will ensure that this practice does not occur and any evidence thereof will be documented and reflect on the Supervisor's own Performance Evaluation.

07-0014

COMPANY UNIFORMS

Purpose

The purpose of this Standard Operating Procedure is to establish CPI Security Corp. Uniforms and Personal Appearance Standards for all employees.

Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp. to have all employees properly attired while on duty. The procedures below give a definitive course of action for all employees to follow.

Procedure

A. GENERAL GUIDELINE

01. All employees shall wear the appropriate uniform and/or protective equipment prescribed by the Client Site Location.



02. All employees shall keep their uniforms clean and in a constant state of readiness.
03. Report any lost, stolen, or damaged uniforms and/or uniform accessories to your Immediate Supervisor.
04. Uniforms are to be worn only while conducting Official Company Business.
05. At no time may an employee purchase, transport, sell, or consume any alcoholic beverage while in uniform or while displaying any Company and/or Client Identification.
06. The Immediate Supervisor or Senior Officer In Charge has the right to conduct a Uniform Inspection at anytime.
07. At no time may an employee carry on or about their persons any unauthorized type of duty gear or equipment.
08. The Immediate Supervisor may request that an employee return any issued uniform or accessory item at anytime.
09. Company Uniforms are to be worn according to this Standard Operating Guideline with no exceptions.
10. Failure of any employee to follow this Standard Operating Guideline shall result in Disciplinary Action, up to and including Termination from the Company.

B. UNIFORM CODE

It is the Standard Operating Procedure of CPI Security Corp. to ensure that all employees are appropriately attired whenever on duty. Attire may vary depending on several factors, including the Client Site Location, weather conditions, and safety hazards that may be encountered while on duty.

In order to present a professional image all employees must strictly adhere to these uniform requirements. The CEO reserves the right to make any necessary uniform

changes as seen fit or if it is deemed to be in the best interest of the Company.

C. PERSONAL APPEARANCE

All employees shall follow the criteria established below concerning their Personal Appearance while on duty and/or in uniform.

01. All employees must maintain a clean and neat appearance.
02. Hairstyles and color shall be worn in a conservative fashion and shall not be worn below the top edge of the shirt collar for males and no more than shoulder length for females.
03. Male facial hair is prohibited. However, a mustache is allowed, as long as it is neat and trimmed. Mustaches may not extend over any part of the lower lip, but may extend ¼” below an imaginary line extended from the ends of the mouth. The ends of the mustache will not be twisted, waxed, or squared, but will be tapered toward the ends of the mouth.
04. Female personnel may wear conservative facial make-up. Fingernail polish is prohibited. Also, employee fingernails must be clean and trimmed. The length of the fingernails may not exceed the top of the fingers when looking at the palm side of the hand.
05. Eyeglasses and Sunglasses must be conservative in style and color.
06. No visible jewelry may be worn except a wristwatch of conservative style and color. Earrings, other body piercing jewelry, visible medals, medallions, necklaces, wrist and ankle bracelets, or similar jewelry may not be worn. Finger rings are limited to one per hand and must be conservative in style and color.

D. ADDITIONAL ORNIMENTATION

Employees may not wear Additional Ornamentation and/or Supplemental Items on their Company Uniforms without the approval of their Immediate Supervisor.



E. CIVILIAN ATTIRE

Civilian Attire is worn when reporting for Company Meetings, Training Courses, and Other Specific Occasions. Employees shall not wear any Company and/or Client Badge, Patch, or Other Identification off duty. All other Company Uniform Rules and Regulations shall apply. No clothing with offensive pictures and/or slogans will be allowed.

F. EXCEPTIONS

Exceptions to these Rules and Regulations may be made only with the approval of the CEO. The Immediate Supervisor or Senior Officer In Charge may make exceptions, but only in circumstances where obtaining approval from the CEO is impractical due to the delay involved.

07-0015 USE OF BODY ARMOR

▼ Purpose

The purpose of this Standard Operating Procedure is to establish the proper Use of Body Armor by all employees while on duty.

▼ Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp. to allow employees to use and wear Body Armor. The procedures below give a definitive course of action for all employees to follow.

▼ Procedure

A. BODY ARMOR

Employees may use and wear Body Armor while on duty, so as long as the Body Armor is worn beneath the uniform shirt and does not show through the shirt material so as to distract from the uniformed appearance of other employees.

The Use of Body Armor is voluntary and is at the comfort and discretion of the individual employee. Due to the cost and budget restrictions of the Company, Body Armor is the sole financial responsibility of the employee.

07-0016 SHAVING RESTRICTIONS

▼ Purpose

The purpose of this Standard Operating Procedure is to establish the proper procedures to be followed by all employees with Shaving Restrictions.

▼ Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp to allow employees not to shave if they have a Valid Medical Reason and a Personal Physician's Order. The procedures below give a definitive course of action for all employees to follow.

▼ Procedure

A. SHAVING RESTRICTION

The only exception to the Standard Operating Procedure concerning the Company Uniform for not shaving is due to a Valid Medical Reason. Any employee who experiences severe medical conditions because of shaving should seek treatment from their Personal Physician.

If an employee's Personal Physician directs the employee to refrain from shaving, the Physician must provide Written Documentation. Employees have the responsibility to provide the Written Documentation to their Immediate Supervisor or Senior Officer In Charge.

The employee's facial and neck hair must be clipped so that the bulk of the hair does not exceed ¼ inch. Additionally, no individual hair may exceed 3/8 inch in length.

07-0017 PHOTO IDENTIFICATION CARDS

▼ Purpose

The purpose of this Standard Operating Procedure is to establish the proper use and/or display of Photo Identification Cards by all employees.



▼ Standard Operating Procedure

It is the Standard Operating Guideline of CPI Security Corp to have employees carry and/or wear Photo Identification Cards. The procedures below give a definitive course of action for all employees to follow.

▼ Procedure

A. PHOTO IDENTIFICATION CARDS

The Company will provide all employees with a Photo Identification Card. Employees are required to carry and/or wear the Photo Identification Card at all times while on duty. If an employee's Photo Identification Card is Lost, Damaged, or Stolen, contact your Immediate Supervisor or Senior Officer In Charge. There will be a \$20.00 fee for each Replacement Photo Identification Card.

Employees will produce their Photo Identification Cards to **ANY** Law Enforcement Official requesting such identification.

Employee Photo Identification Cards remain the property of the Company and must be returned if the Company no longer employs you. Specific Client Site Location Identification Cards shall be carried or worn according to Specific Client Standard Operating Procedures. If you have any further questions please contact your Immediate Supervisor.

▼ 07-0018

ARREST PROCEDURES

▼ Purpose

The purpose of this Standard Operating Procedure is to establish the course of action for all employees to follow when making a Citizen's Arrest.

▼ Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp to allow employees to make a Citizen's Arrest when necessary. The procedures below give a definitive course of action for all employees to follow.

▼ Procedure

A. GENERAL INFORMATION

Employees should only consider making a Citizen's Arrest when necessary to complete a Criminal Justice

Procedure, such as to arrest and hold an individual witnessed in the commission of a crime pending the arrival of Law Enforcement Officials.

Employees will strictly adhere to the following in addition to State Law. It is best to think of your authority as being outlined by statute. Most states recognize security personnel as civilians. Therefore, you are not police officers or peace officers, both whom have the authority and many times the requirements to make arrests on probable cause.

As a civilian, you may also make an arrest of a person, but **NEVER** upon probable cause. An arrest is taking of a person into custody in order for such person to answer a charge in a court of law. As a civilian, you can arrest a person, when such person:

01. Has **IN FACT** committed a crime; and
02. Such crime was committed in your presence; and
03. The person arrested is the same person who committed the offense.

The term **IN FACT** is among the most important element that a civilian must take into consideration before limiting a person's freedom. Serious liability can result for falsely imprisoning, arresting, or detaining a person who is found not guilty or worse, a person whom a police officer or peace officer elects not to process for lack of evidence or for their belief that the person has not committed the offense.

The Company is committed to providing a safe environment for our Clients and we understand that there may be times when an arrest is inevitable in order to provide such safety. We also understand that the business of Civilian Arrests can get quite dangerous as well as risky in terms of liability for the employee and the Company. Therefore, the Company has taken the position, that, our employees should only take such action as the last resort to ensure the protection of life and in a very limited amount of instances for the protection of property.



B. PRE-ARREST

Except in the instance where a felony has occurred and no time is available, the following procedural steps will be used prior to making a Citizen's Arrest:

01. A clear and concise description of the behavior that we wish to have curtailed is given to the person, such as smoking in an unauthorized area; loud or disruptive talking, threatening other people, etc. This is the first step in the process. Explain the behavior is unacceptable, give a reasonable opportunity to comply, and explain the options.
02. Explaining the options is a matter that must be handled with diplomacy and tact, such as explaining the Trespass Law. If step one has failed after a reasonable opportunity to comply has been given, simply explain that if the behavior is not curtailed we will have to press charges for Trespassing. Be sure to explain that it is Private Property and it is our right as an Agent of the Property Owner to control who uses the property and unacceptable behavior is not permitted.
03. If this fails to stop the inappropriate behavior, the third step is to ask the person to leave the property or face Arrest for Trespass. Be persistent, but polite. Remain calm and objective.
04. The fourth and final step is to contact law enforcement via 911 and explain the situation, and request assistance. Be aware that when the Law Enforcement Officer arrives, they may also attempt to change the behavior. The Law Enforcement Officer may also ask you to explain the Trespass Charge in their presence. Every attempt should be made for the person to leave voluntarily and a Citizen's Arrest should be a last resort.

C. POST-ARREST

Employees shall follow the procedures below after a Citizen's Arrest has been made:

01. Document each of the steps from the procedures outlined above. Describe accurately the behavior, who called you, each step taken to resolve

the incident, and be sure to include the person's reaction.

02. Document the Law Enforcement Response and any further actions that the Law Enforcement Officer took to resolve the conflict and the ultimate outcome.
03. Contact the Immediate Supervisor or Senior Officer In Charge as soon as possible. If at all possible, this contact should occur before the options are expressed to the person. If the Immediate Supervisor or Senior Officer In Charge is on shift, they should be the one to make the Citizen's Arrest. If the behavior is seriously disrupting, the Citizen's Arrest may be necessary prior to their notification.
04. Document the entire incident using an Incident Report and Arrest Report. Remember that litigation could occur as long as one year from the initial incident.

07-0019 USE OF FORCE

Purpose

The purpose of this Standard Operating Procedure is to establish the course of action for all employees to follow when the Use of Force is permissible.

Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp to set forth the proper Use of Force criteria for all employees. The procedures below give a definitive course of action for all employees to follow.

Procedure

A. GENERAL INFORMATION

01. Carefully observe the situation to determine whether you will need assistance or if you can handle the altercation yourself.
 - A. If you need assistance, call for additional officers if available. If additional officers are not available, call for law enforcement assistance via **911**.



- B. If it is an extremely dangerous situation such as, a weapon involved, call for Law Enforcement Assistance via 911 immediately. **DO NOT TAKE FURTHER ACTION UNTIL THEY ARRIVE!**
02. If you are able to handle the situation, utilize the following procedure:
01. Try to persuade the subject(s) to calm down. Do not threaten, be firm, but tactful.
02. Request that the subject(s) leave. If they refuse to leave, call for Law Enforcement Assistance via **911**. Keep a watch on the subject(s) until Law Enforcement Officials arrive. If deemed necessary, place the subject(s) under Citizen's Arrest and wait for Law Enforcement Officials to arrive.
03. Any subject(s) placed under Citizen's Arrest shall be handcuffed per our Company's Standard Operating Guideline and searched to ensure the safety of all involved.
04. In all cases, only the minimal amount of force necessary to effect lawful objectives, which is consistent with the accomplishment of a mission, will be used and is authorized. A firearm will be viewed as a defensive weapon, not a tool of apprehension.
05. Deadly physical force will be used in self-defense to protect you from an imminent threat of deadly physical force or in defense of the life of another.
06. Employees will **NOT** use chokeholds. A chokehold shall include, but is not limited to, any pressure to the throat or windpipe, which may prevent or hinder breathing or reduce the intake of air.
07. Whenever possible, employees should make every effort to avoid tactics, such as sitting or standing on a subject's chest, which may result in chest compression, thereby reducing the subject's ability to breathe.
08. All employees are responsible and accountable for the proper Use of Force under these circumstances. Employees are reminded that the application of force must be consistent with existing law and Company values, by which we pledge to value human life and respect the dignity of each individual. Depending on the circumstances, both Federal and State Law provide for criminal sanctions and civil liability against persons when force is deemed excessive, wrongful, or improperly applied.
09. The primary duty of all employees is to preserve human life. Only that amount of force necessary to affect an arrest or take a mentally ill or emotionally disturbed person into custody, who has **IN FACT** committed a crime in your presence and the situation, warrants your immediate intervention to preserve life.
10. Deadly physical force will be used **ONLY** as a last resort and consistent with the law to protect yourself or another person from the imminent threat of deadly force. Excessive force will **NOT** be tolerated. All employees at the scene of an incident must:
01. Immediately establish firearms control;
02. Use minimum necessary force;
03. Employ non-lethal alternatives as appropriate.
- A. Persons taken into custody shall be rear cuffed at the earliest opportunity to reduce the potential for resistance, which may cause injuries. After an individual has been controlled and placed under custodial restraint using handcuffs, the person should be positioned so as to promote free breathing.
- B. The subject should not be maintained or transported in a face down position. Employees assuming custody of the subject should closely observe them for any apparent injuries.



C. If the area is dark, a flashlight or other source of illumination should be used to maintain a clear view of the subject at all times until properly relieved by a Law Enforcement Official.

D. If a person appears to be having difficulty breathing or is otherwise demonstrating life-threatening symptoms, medical assistance will be requested immediately.

11. “Use of Force Continuum”, starting with Verbal Commands and progressing to Hand Control, OC Spray, ASP Baton, and Deadly Force, is to be utilized, when necessary to perform any authorized action. Employees may begin the application of force at any level of the continuum deemed reasonable by the individual circumstances of the incident.

12. Document the entire incident using an “Incident Report” and “Arrest Report”. Remember that litigation could occur as long as one year from the initial incident.

are a Temporary Restraining Device only used when making a Citizen’s Arrest or while detaining a subject(s) in a Criminal Justice Procedure until Law Enforcement Officials arrive and take custody.

A. Handcuffs shall only be carried by trained and certified employees.

B. Handcuffs are not to be used as restraints on patients at Healthcare Facilities.

C. Only Company Issued Handcuffs will be carried by employees. The Handcuffs will be carried in a Company Issued Closed Case attached to the Duty Belt.

D. Handcuffs are never to be removed from their Holder, unless there immediate use is justified.

E. Off Duty Use is Prohibited.

F. Care should be taken to use only the necessary force to subdue a subject(s). Employees should take care to have sufficient assistance on hand to minimize the danger to all concerned.

G. If a subject(s) is in danger of harming themselves, others, and/or causing property damage Handcuffs are to be used.

H. Employees should be aware that Handcuffs have a “Double Lock” capability that prevents them from tightening on the wrist inadvertently. Make sure the Handcuffs are not carried in the “Double Lock” mode that would render them unusable at a critical moment.

I. The Immediate Supervisor or Senior Officer In Charge shall be notified, as soon as possible, when the Use of Handcuffs is necessary. An Incident Report and Arrest Report shall be completed prior to the end of the employee’s shift.

J. If Handcuffs are ever used as a weapon or used in any other way but to detain a subject(s) in

07-0020 HANDCUFFS

Purpose

The purpose of this Standard Operating Procedure is to establish the proper use of Handcuffs by all authorized and certified employees while on/off duty.

Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp. to allow employees to use only Company Issued Handcuffs. The procedures below give a definitive course of action for all employees to follow.

Procedure

Employees authorized to use Handcuffs must first complete a Training Program and be Certified for their use by a State Certified Instructor approved by the Company.

A. GENERAL GUIDELINES

The following criteria shall be strictly enforced by the Company. It is important to remember that Handcuffs



the process of a Citizen's Arrest, the employee will face Disciplinary Action, up to and including Termination from the Company.

- K. It is important to remember that Handcuffs are a Temporary Restraining Device. They are not intended for Long Term Immobilization. It is recommended that periodic checks be made of the subject(s) hands and wrists to avoid soft tissue or nerve damage. The restrained subject(s) should be considered a threat, even though restrained. The restrained subject(s) should be kept under observation, when possible.
- L. You should always carry two keys with you. One should be readily available for the removal of the Handcuffs and the other should be concealed on your person for emergency use.
- M. In general, Handcuff the subject(s) first and then conduct a thorough search. The search procedure should insure that there are no weapons or foreign objects that could be used to pick the lock such as ball point pens, pins, metal strips, hair pins, etc.
- N. Attempt to keep the subject(s) off balance when applying the Handcuffs. Keep yourself in a well-balanced alert stance while performing the Handcuffing Sequence.
- O. Over tightening can cause soft tissue and/or nerve damage. Perform periodic checks to insure the subject(s) hands are in good condition and to deter any possible escape. Never Handcuff a subject(s) to you, a fixed object, or to a vehicle.
- P. Subjects are to be rear cuffed only.

to establish the proper use of Collapsible Batons by all authorized and certified employees while on/off duty.

Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp. to allow employees to use only Company Issued Collapsible Batons. The procedures below give a definitive course of action for all employees to follow.

Procedure

Employees authorized to use Collapsible Batons must first complete a Training Program and be Certified for its use by a State Certified Instructor approved by the Company.

A. USE OF COLLAPSIBLE BATONS

- 01. Collapsible Batons shall only be carried by trained and certified employees.
- 02. The use of the Collapsible Baton will constitute the Use of Force, as defined in our Company Standard Operating Guidelines Manual, and must meet one or all of the requirements for the Use of Force outlined by that Standard Operating Guideline.
- 03. The Collapsible Baton is never to be removed from its Holder, unless its immediate use is justified.
- 04. Off Duty Use is Prohibited.
- 05. Only Company Issued Collapsible Batons will be carried by employees. The Collapsible Baton will be carried in a Company Issued Holder attached to the Duty Belt.
- 06. Employees will make medical treatment available to a subject(s) upon request or whenever the baton is used to lawfully defend oneself or another from great bodily harm.
- 07. At no time shall the Collapsible Baton be used to intimidate, threaten, or to punish a subject(s).
- 08. Employees will complete a detailed Incident Report and Arrest Report anytime the Collapsible

07-0021

COLLAPSIBLE BATONS

Purpose

The purpose of this Standard Operating Guideline is



Baton is used. The Immediate Supervisor or Senior Officer In Charge shall be contacted to report the incident as soon as possible.

used. The Immediate Supervisor or Senior Officer In Charge shall be contacted to report the incident as soon as possible.

07-0022 OC SPRAY

▼ Purpose

The purpose of this Standard Operating Procedure is to establish the proper use of Oleoresin Capsicum (OC) Spray by all authorized and certified employees while on/off duty.

▼ Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp. to allow employees to use only Company Issued OC Spray. The procedures below give a definitive course of action for all employees to follow.

▼ Procedure

Employees authorized to use OC Spray must first complete a Training Program and be Certified for its use by a State Certified Instructor approved by the Company.

A. USE OF OC SPRAY

01. OC Spray shall only be carried by trained and certified employees.
02. The use of OC Spray will constitute the Use of Force, as defined in our Company Standard Operating Procedures Manual, and must meet one or all of the requirements for the Use of Force outlined by that Standard Operating Procedure.
03. The OC Spray is never to be removed from its Holder, unless its immediate use is justified.
04. Off Duty Use is Prohibited.
05. Only Company Issued OC Spray will be carried by employees. The OC Spray will be carried in a Company Issued Closed Top Holder attached to the Duty Belt.
06. Employees will complete a detailed Incident Report and Arrest Report anytime OC Spray is

B. AFTER CARE

01. Whenever OC Spray is used, employees should use caution when approaching subject(s) and use proper restraint and control methods.
02. Subject(s) who are sprayed with OC Spray should be monitored and verbally reassured that they are safe and the effects should wear off shortly.
03. Employees will make medical treatment available to subject(s) upon request or if the effects of the OC Spray persist beyond 45 minutes.

C. MAINTENANCE OF OC SPRAY

01. OC Spray should be stored at proper room temperature.
02. Do not puncture or incinerate the OC Spray Unit.
03. After use, ask your Immediate Supervisor for a replacement OC Spray Unit.

07-0023 PROHIBITED USE OF FIREARMS

▼ Purpose

The purpose of this Standard Operating Guideline is to establish the Prohibited Use of Firearms by all employees while on duty.

▼ Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp. to prohibit employees from carrying or using any type of firearms while on duty. The procedures below give a definitive course of action for all employees to follow.



Procedure

A. FIREARMS

Employees are Prohibited from Concealing and/or Openly Carrying any Firearm, Ammunition, Speed-Loaders, Magazine Clips, Speed-Loader or Magazine Clip Pouches, and/or Holsters of any type while on duty.

Employees who violate this Standard Operating Procedure will be subject to Disciplinary Action, up to and including Termination from the Company.

07-0024 PROHIBITED USE OF UNAUTHORIZED WEAPONS

Purpose

The purpose of this Standard Operating Procedure is to establish the Prohibited Use of Unauthorized Weapons by employees while on duty.

Standard Operating Procedure

It is the Standard Operating Procedure of the CPI Security Corp. to prohibit employees from carrying or using any type of Unauthorized Weapons while on duty. The procedures below give a definitive course of action for all employees to follow.

Procedure

A. UNAUTHORIZED WEAPONS

Employees are Prohibited from Concealing and/or Openly Carrying any Type of Unauthorized Weapons while on duty. The following list is by no means exhaustive. Please contact your Immediate Supervisor if you have any further questions or require further clarification. Unauthorized Weapons include, but are not limited to the following:

01. Tazer Guns
02. Stun Guns
03. Knives
04. SAPs
05. Lead Filled Gloves
06. Brass Knuckles
07. Slap Jacks

The carrying or use of any weapon not specifically issued or authorized by the Company is strictly

prohibited, except in those extreme situations where an employee has no other choice but to use an Unauthorized Weapon to prevent the immediate threat of death or greatly bodily harm.

Employees who violate this Standard Operating Procedure will be subject to Disciplinary Action, up to and including Termination from the Company.

07-0025 PATROL OPERATIONS

Purpose

The purpose of this Standard Operating Procedure is to establish the expectations for all employees performing Patrol Operations.

Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp. to set forth expectations of employees during Patrol Operations. The procedures below give a definitive course of action for all employees to follow.

Procedure

A. PATROL OPERATIONS

Employees are expected to conduct patrols in accordance with established Client Site Location Post Orders. Patrols should be conducted regularly, but in a random fashion so as not to allow others to establish a pattern. Use the following patrol techniques listed below to assist in your Patrol Operations:

01. Patrol in pairs whenever possible. Carry a cellular phone, if available, to call **911** in emergencies;
02. Patrol your area completely, looking for suspicious activity or person(s) in distress. Also check for smoke, fire, and/or fresh damage caused by vandals;
03. Report disorderly groups and/or persons found on the property. Remember that a group of kids is **NOT** normally a disorderly group;
04. Patrol known trouble spots heavily. Watch for vehicles cruising the area aimlessly and



continuously. Watch for persons loitering around and being secretive, evasive, or suspicious;

05. Report street lights and security lights that are not working;
06. Watch for merchandise or household goods being loaded into vehicles or carried by individuals;
07. Patrol **ALL** paved alleys and parking lots at your Client Site Location;
08. Get **CORRECT** vehicle license plate numbers, accurate descriptions, and locations;
09. Always patrol in an unpredictable pattern;
10. Investigate persons who appear to be looking into vehicles;
11. Stay as visible as possible to create the sense of "Security Is Everywhere";
12. Double back on your patrol route in order to surprise those who are studying your patrol patterns;
13. Utilize tact and diplomacy when dealing with uncooperative subjects;
14. Always follow established Client Site Post Orders.

B. AREAS TO PATROL

Areas and items to be checked while on patrol include, but are not necessarily limited to the following:

01. Common Areas
02. Stairwells
03. Parking Lots/Structures
04. Electrical or Mechanical Rooms
05. Loading Docks
06. Alleys
07. Swimming Pools
08. Roofs
09. Doors
10. Windows

C. PROCEDURES FOR "CRIME IN PROGRESS" SITUATIONS

01. Report the incident and location to police immediately via **911**;
02. Keep the situation under observation and report all activity at the scene;
03. Remain at a safe distance and location if necessary or take other appropriate action to protect life and property;
04. Assist Law Enforcement or Fire/Rescue personnel if so requested;
05. If someone is being physically injured, take the appropriate action as necessary to preserve life.

Employees should always be attentive while on patrol, document all potential safety and fire hazards, and take appropriate corrective actions if necessary. If applicable, Daily Activity Reports shall be completed accurately and in a timely manner. Please refer to established Client Site Location Post Orders for more detailed information and specific instructions to be followed or contact your Immediate Supervisor for further clarification.

D. REQUESTS FOR CONCENTRATED PATROLS

The Company acknowledges the need for Concentrated Patrols, also known as Increased Patrol Checks or Special Watch Checks. These patrols can and have been initiated formally by issuing a directive.

The Company also recognizes that employees can make the determination whether or not concentrated patrol is necessary. Therefore, the Company realizes the need to establish an informal method of notifying our employees of areas or situations that may need their attention.

E. PROCEDURES FOR CONCENTRATED PATROLS

Assurances to the Client that the department will provide increased patrols will not be made unless a Memorandum directing the concentrated patrols has been issued. This type of patrol requires a Supervisor to direct the patrols, the rationale for the patrols, the span



of time for the patrols, how often and action sought, i.e., drive-by, physical check of premises, etc. The author of the Memorandum will cause its directive to appear in the Shift Pass-On Logbook.

Employees assigned to the task will ensure their actions are documented on a Daily Activity Report if applicable. In the event a directed action could not be performed because of situations beyond the employee's control, that too, will also be documented. A Memorandum to provide increased patrols can be cancelled by a higher ranking Supervisor's directive.

Employees may informally notify each other of areas or situations that may need their attention. This informal notification can be made through the Shift Pass-On Logbook. Employees will not make assurances to the public or the Client about these types of patrols. Furthermore, there is no assumption employees will respond to the notices. For insurance purposes, the President/CEO will make the final determination, whether an extra patrol or function shall be performed.

Never assure **ANY** person that you will protect any person or property, which has not been included in the Client/Company Service Agreement; doing so, can inherently open the Company and the employee for civil liability without insurance coverage.

07-0026 VEHICLES & EQUIPMENT

▼ Purpose

The purpose of this Standard Operating Procedure is to establish the responsibilities of each employee concerning the proper care and use of Company and/or Client Owned Vehicles & Equipment.

▼ Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp to keep all Company and/or Client Owned Vehicles & Equipment in a constant state of readiness at all times. The procedures below give a definitive course of action for all employees to follow.

▼ Procedure

A. COMPANY & CLIENT OWNED VEHICLES

01. Patrol Vehicles are to be used only for Official Company and/or Client Business such as:

Patrol Operations;
Training Courses and Seminars;
Routine Maintenance and/or Repair Appointments.

02. With the exception of Patrol Operations, Patrol Vehicles may not be used without permission from the Immediate Supervisor or Senior Officer In Charge.
03. Seat belts are to be worn by all occupants of any Patrol Vehicle while in motion.
04. All Patrol Vehicles are to be logged in and out with the Date, Time Out, Starting Mileage, Time In, Ending Mileage, and Employee's Initials.
05. Vehicle radios shall be kept at a reasonable volume. Offensive music or talk shows shall not be played while other passengers are present.
06. Patrol Vehicles are to be kept clean and neat, no garbage is to be left inside.
07. When Patrol Vehicles are parked, turn off all equipment and accessories.
08. All Patrol Vehicles shall be washed on a regular basis.
09. Employees shall not allow any unauthorized passengers in any Patrol Vehicle without permission from the Immediate Supervisor or Senior Officer In Charge.
10. Employees shall not use any cell phones, tablets, laptop computers, or other similar devices while driving. Employees shall pull over and park where legally allowed to do so in order to use such devices. Also, employees are not allowed to eat and/or drink while driving.



B. MAINTENANCE INSPECTIONS

It is necessary for all Company and/or Client Owned Patrol Vehicles to be maintained in proper working order to ensure that they will be ready at all times. In order to ensure this, it is necessary to inspect and test all Patrol Vehicles on a routine basis. The following outline identifies the steps taken in the Inspection Process:

01. A Patrol Vehicle Inspection Form shall be used in order to make sure all necessary items are checked and to document that inspections were made;
02. If a condition is found on a Patrol Vehicle to be out of order or in need of service or repair, the Immediate Supervisor or Senior Officer In Charge must be notified.

C. EMERGENCY RESPONSE DRIVING

Employees shall always operate Company and/or Client Owned Patrol Vehicles during Emergency Incidents in accordance with all applicable traffic laws and in a manner which ensures the utmost safety for employees and the general public.

An Emergency Incident is defined generally as any incident where life saving or protection activities are needed or are in progress. This may include, but is not necessarily limited to the following:

Activated Alarms;
Traffic Accidents With Injuries;
Fights In Progress;
Officer Needs Assistance Calls;
Hazardous Materials Incidents;
Medical Emergencies.

In cases where questions exist as to whether or not the incident qualifies as an Emergency Incident, the driver shall respond in a Non-Emergency Response Mode unless directed otherwise by an Immediate Supervisor or Senior Officer In Charge.

Recognizing the fact that no set Standard Operating Procedure can be established that will cover all circumstances, therefore this Standard Operating Procedure does not relieve the driver of a Company and/

or Client Owned Patrol Vehicle from exercising good judgment in the operation of a Company and/or Client Owned Patrol Vehicle during an Emergency Incident.

Company and/or Client Owned Patrol Vehicles may only be driven in an Emergency Response Mode, use of lights and/or sirens, during an Emergency Incident while on the Client Site Property **ONLY!** Failure to adhere to this Standard Operating Procedure will result in Disciplinary Action, up to and including Termination from the Company.

Employees shall exercise the following procedures while driving any Company and/or Client Owned Patrol Vehicle in an Emergency Response Mode:

01. At no time shall an employee of this Company exceed the Maximum Posted Speed Limit.
02. Employees responding in an Emergency Response Mode must bring their vehicle to a complete stop at the following:
 1. When directed by a Traffic Officer or School Crossing Guard;
 2. At Red Traffic Signals or Inoperable Traffic Signals;
 3. At Stop Signs;
 4. At Negative Right-of-Way Intersections;
 5. At Blind Intersections;
 6. When the driver cannot account for All Lanes of Traffic;
 7. When Other Intersection Hazards are present;
 8. When encountering a School Bus boarding or disembarking passengers. The driver shall only proceed after being signaled to do so by the Bus Driver;
 9. At All Unguarded Railroad Grade Crossings.

In all cases the driver may proceed only after accounting for All Lanes of Traffic. Emergency Signaling Devices may be used at other times, including Non-Emergency Incidents to warn of a Roadway Hazard or Other Similar Situations requiring Visual Warning for the Safety of Employees and/or the General Public.



D. ACCIDENTS INVOLVING PATROL VEHICLES

The following steps will be taken anytime a Company and/or Client Owned Patrol Vehicle is involved in a traffic accident regardless of the severity:

01. Check for injuries to civilians and/or employees and request an ambulance if needed;
02. In all instances, a Law Enforcement Officer will be requested to take a report.
03. Vehicles will be left in their resting positions until the arrival of a Law Enforcement Officer unless a Life Safety Hazard exists;
04. The Immediate Supervisor or Senior Officer In Charge shall be notified immediately;
05. All required Accident Reports shall be handled by the Law Enforcement Department and Copies will be sent to the President/CEO;
06. Cooperation by all employees with Law Enforcement Investigating the accident is expected.

E. COMPANY & CLIENT OWNED EQUIPMENT

01. The use of any Company and/or Client Owned Equipment for the personal gain of oneself is prohibited.
02. The use of Company and/or Client Owned Equipment by outside organizations and/or companies is prohibited without the approval of the Immediate Supervisor or Senior Officer In Charge.
03. All equipment not in use shall be kept in a secure location. Employees using any equipment shall be responsible for it and may be required to pay for the loss of it, if it is found the employee was negligent in the use of the equipment.
04. All equipment while being used will not be left unattended or loaned to any unauthorized person(s).

05. Employees shall inform the Immediate Supervisor or Senior Officer In Charge of any lost, stolen, or damaged equipment.

06. All Company and/or Client Owned Equipment will be cleaned, restocked, replaced, reported if damaged, and put back in its proper place after each use.

07. All employees shall return all issued equipment to the Immediate Supervisor when they Resign, Retire, or are Terminated from the Company.

08. All employees shall keep all issued equipment in good working order and in a constant state of readiness at all times.

09. Employees may be requested at anytime by their Immediate Supervisor to return a piece of issued equipment.

F. MAINTENANCE INSPECTIONS

It is necessary for all Company and/or Client Owned Equipment to be maintained in proper working order to ensure it will be ready at all times. In order to ensure this, it is necessary to inspect and test all equipment on a routine basis. The following outline identifies the steps taken in the inspection process:

01. An Equipment Inspection Form shall be used in order to make sure all necessary items are checked and to document that inspections were made;
02. If a condition is found on any Company and/or Client Owned Equipment to be out of order or in need of service or repair, the Immediate Supervisor or Senior Officer In Charge must be notified.

07-0027 EMPLOYEE ISSUED KEYS

Purpose

The purpose of this Standard Operating Procedure is to establish the proper procedures concerning Employee Issued Keys.



Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp. to issue keys to certain employees in order for them to provide beneficial service. The procedures below give a definitive course of action for all employees to follow.

Procedure

A. COMPANY/CLIENT ISSUED KEYS

Employees who are issued Company/Client Keys will be required to sign and date a Key Issuance and Return Form, as applicable, at the beginning and end of their employment with the Company. Employees who are not issued keys on a full-time basis, but rather only when on their Client Site Location shall always document the keys on a Daily Key Log.

Keys are **NOT** to be copied under any circumstances, unless authorized by the President/CEO. Employees found to have created keys on their own shall be subject to Disciplinary Action, up to and including Termination from the Company. All keys issued to employees must always be safeguarded and never loaned to anyone. Immediately report any Lost or Stolen Keys to your Immediate Supervisor.

Employees may be responsible for the cost of re-keying the Client Site Location, if such action becomes necessary, due to Lost, Stolen, or Unauthorized Copied Keys.

07-0028 COMPANY & CLIENT RADIOS

Purpose

The purpose of this Standard Operating Procedure is to establish the proper care and usage of Company and/or Client owned two-way radios.

Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp. to allow employees to use Company and/or Client owned two-way radios at Specific Client Site Locations. The procedures below give a definitive course of action for all employees to follow.

Procedure

A. CARE AND USAGE

Employees will familiarize themselves with proper radio 10-codes. The Company cannot emphasize enough, the importance of professional usage of two-way radio equipment. All employees, upon initial on-site training, will use their employee number as their radio call sign. That radio call sign will be utilized each and every time a radio transmission is generated. Employees found making **ANY** unauthorized transmissions will be subject to immediate Disciplinary Action, up to and including Termination from the Company.

Employees will demonstrate the ability to communicate clearly and calmly during emergency situations and during routine transmissions. Employees are responsible for the care and security of the radio assigned to them. Radios will be signed in/out at the beginning and end of each shift, making note of the radio's condition. When charging a radio, be sure to turn the radio off before placing it on the charger.

Official Radio 10-Code Lists will be posted at each Client Site Location, if applicable, and a copy will be issued to each employee. If you have any further questions, please consult your Immediate Supervisor for further clarification.

07-0029 REPORT PROCEDURES

Purpose

The purpose of this Standard Operating Procedure is to establish proper Report Procedures for employees.

Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp. to have employees properly complete Company Reports. The procedures below give a definitive course of action for all employees to follow.

Procedure

A. COMPANY REPORTS

All Company Reports are to be submitted by any



employee providing a service or responding to an incident. All reports must be reviewed, approved, and signed off on by the Immediate Supervisor prior to forwarding the reports to the COO.

Anyone making a request for service, who also requests a copy of a report, will be directed to the CEO for release of information proceedings. Reports must first be reviewed, approved, and signed off on by the CEO before such a release of information is made to anyone.

Company Reports will be written neatly and in a professional manner. Employees are prohibited from using "police jargon" or other slang in their reports. Please write all reports with the following Procedures listed below:

01. Use only **BLACK INK** on **ALL** Company Reports.
02. Always place a zero in front of single digit numbers. **Example:** 01/01/16 not 1/1/16
03. Obtain correct spelling of full names. Print Last Name, First Name, and Middle Initial.
Example: Public, John Q.
04. Use Military Time.
Example: 0130 Hrs. for 1:30 a.m.
05. Include area codes for **ALL** phone numbers.
06. Provide complete addresses including zip codes.
07. Always write your report narratives in a fact only format. Do not include opinions.

The above list is in no way exhaustive, if you have any additional questions or require further clarification; please contact your Immediate Supervisor.

07-0030 LOST & FOUND PROCEDURES

Purpose

The purpose of this Standard Operating Procedure is to establish the proper documentation of Lost & Found Reports by all employees.

Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp. to maintain Lost & Found Reports at Specific Client Site Locations. The procedures below give a definitive course of action for all employees to follow.

Procedure

A. LOST & FOUND PROCEDURES

If an employee, in the performance of his/her duties comes into possession of any Lost/Found Property or Contraband, he/she must follow the listed steps to insure the Integrity, Chain of Custody, and Safety of such Property.

The employee will first ascertain if the property is a suspected controlled substance as defined in California State Law. If the property is determined to be a controlled substance, the employee shall immediately notify the proper Law Enforcement Agency.

***** THE COMPANY DOES NOT INVOICE, STORE, COLLECT, OR HANDLE CONTROLLED SUBSTANCES UNDER ANY CIRCUMSTANCES, EXCEPT:**

01. During an emergency situation when a person's life is at risk;
02. To secure an area where children or other persons or animals may come into contact with the substance;
03. At the direction of Law Enforcement Officials.

B. INVOICING OF PROPERTY

Employees who come into contact with apparent Lost/Found Property shall immediately:

- A. Obtain a Lost/Found Property Report Number;
- B. Secure the Property in a Property Bag or other Appropriate Container;
- C. Seal the Property and attach a Property Tag;
- D. Make the appropriate notifications.

Note: Never Invoice Suspected Contraband without



first notifying Law Enforcement Officials and obtaining instructions.

Any personal items reported Lost or Found at any Client Site Location shall be documented on a Lost and Found Report. Found items shall be tagged and stored for safe-keeping.

Generally, found Items shall be kept for 60 days, with the exception of valuable items or cash, which shall be held for 90 days, unless otherwise dictated by Specific Client Site Location Post Orders.

This Standard Operating Procedure is subject to those Client Site Locations who have established Lost & Found Procedures. If you have any questions or require further clarification, please contact your Immediate Supervisor.

07-0031 MOTORIST ASSISTANCE

▼ Purpose

The purpose of this Standard Operating Procedure is to establish proper procedures for employees concerning requests for Motorist Assistance.

▼ Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp. to have employees provide Motorist Assistance at Specific Client Site Locations. The procedures below give a definitive course of action for all employees to follow.

▼ Procedure

A. BATTERY JUMP-STARTS

Employees will provide Battery Jump-Starts using a Company and/or Client Owned Battery Jump Pack **ONLY!** No jumper cables are to be used under any circumstances. The Battery Jump Pack has an internal safe guard built in to prevent the accidental crossing of the battery connections. This greatly reduces the liability to all concerned. Please follow the instructions provided with the Jump Pack for proper care, use, and charging of the unit.

B. FLAT TIRE INFLATIONS

Under no circumstances are employees to physically change a flat tire. This greatly reduces the liability to all concerned. However, employees may use the Air Compressor feature on the Company and/or Client Owned Battery Jump Pack to inflate a flat tire that is able to hold air. This allows the motorist to at least drive to a service center for a permanent repair. Please follow the instructions provided with the Jump Pack for proper care, use, and charging of the unit.

C. VEHICLE LOCK-OUTS

Whenever a motorist requests a Vehicle Lock-Out, the employee must first prove ownership of the vehicle, such as a Vehicle Registration Form, Insurance Policy or Card, and/or Vehicle Title. Under no circumstances may an employee unlock a vehicle without properly identifying the motorist as the legal vehicle owner first. This greatly reduces the liability to all concerned. Employees shall only use approved Company and/or Client Owned Lock-Out Equipment. Never use a Slim-Jim Device, Coat Hanger, or Other Unauthorized Tool. Please follow the instructions provided with the Lock-Out Equipment for proper care and use.

D. MOVING OF VEHICLES

If employees are requested to move a vehicle for a motorist, such as a patient comes into the emergency room and parked their vehicle in front of the entrance doors, employees shall obtain the owners keys, will legally park and secure the vehicle. The owner's keys shall be returned immediately, preferably with a witness present. Under no circumstances shall employees move a disabled vehicle manually (Physically Pushing the Vehicle) or by using a Company and/or Client Owned Vehicle. This greatly reduces the liability for all concerned.

Disabled vehicles creating a traffic or safety hazard are to be towed to a safe location at the vehicle owner's expense. Provide Traffic Control, if necessary, in order to protect Life and/or Property.



Please follow the guidelines below:

- A. Never perform any of the above listed Motorist Assistance off Client Site Property;
- B. Never perform any of the above listed Motorist Assistance, until after completing a Vehicle Authorization Form and obtaining a valid vehicle owner's signature. The only exception would be in an Emergency Situation when a child, animal, or other human being is locked inside of a vehicle or other situations as necessary for the preservation of life and/or property;
- C. In the preservation of life, you do not need, nor should you consider the possibility of obtaining a Vehicle Authorization Form from anyone. Your first responsibility is the preservation of life;
- D. For the preservation of property, you should always obtain a signed waiver from the person requesting such service.
- E. All person(s) making a request for service are to be advised as to what action was, can, or will be taken regarding their request for service;
- F. There is an inherent risk of severe injury or damage caused by attempting to open a vehicle with a Slim-Jim Device that possesses **SIDE IMPACT AIR BAGS**. Therefore, employees are **NOT** authorized to utilize any such tool for the purpose of gaining entry into a locked vehicle.

when Missing Persons are reported. The procedures below give a definitive course of action for all employees to follow.

Procedure

A. DEFINITIONS

A **MISSING PERSON** is a person of any age who is missing from his or her normal or ordinary place of residence and whose whereabouts cannot be determined.

A **MISSING CHILD** is a person under the age of 18 who is missing from his or her normal or ordinary place of residence, or missing from any location from which the child's whereabouts cannot be determined by a person responsible for the child's care.

B. APPROPRIATE RESPONSE

When employees are notified of a missing person or a missing child, the following will be strictly adhered to:

01. Immediately notify the appropriate Law Enforcement Agency via **911**;
02. Attempt to obtain a full description of the missing person;
03. Make notifications to the appropriate Client Site Location Representative or other persons in an authority position of the situation and provide them with a contact phone number to reach you in case they come into contact with the missing person;
04. Conduct a search of the area, utilizing a Grid Search Pattern;
05. Upon completion of your search or termination thereof, complete an Incident Report, which includes the names, description, last known location of the missing person, and include your actions taken.

07-0032

MISSING PERSONS

Purpose

The purpose of this Standard Operating Procedure is to establish the proper procedures of reports received for Missing Persons.

Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp. to have employees take appropriate measures



07-0033 MEDICAL EMERGENCIES

▼ Purpose

The purpose of this Standard Operating Procedure is to establish proper response to any Medical Emergencies.

▼ Standard Operating Guideline

It is the Standard Operating Procedure of CPI Security Corp. to have employees respond to Medical Emergencies. The procedures below give a definitive course of action for all employees to follow.

▼ Procedure

A. RESPONSE TO MEDICAL EMERGENCIES

A Medical Emergency is an incident in which employees render aid to a sick or injured person. Please follow the below listed outline:

01. An Incident Report is required for **ALL** Medical Emergencies;
02. If a victim is unresponsive or requests transportation to a medical facility because of an illness or injury, employees shall immediately notify an ambulance via **911**;
03. Unless severe extenuating circumstances exist, never transport a sick or injured person in a Company/Client Owned or Personal Vehicle;
04. If you are currently certified, you should immediately provide the sick or injured person with basic life support if necessary. Remember to **NEVER** discontinue CPR until properly relieved by emergency medical personnel or other qualified healthcare professionals;
05. Never attempt to render aid to anyone if you are not qualified to render such aid;

Once EMS has assumed control over a Medical Emergency, employees shall assist as necessary and provide security around the scene to allow emergency personnel access to the scene or to keep unauthorized persons away from the scene.

07-0034 BLOODBORNE PATHOGENS

▼ Purpose

The purpose of this Standard Operating Procedure is to establish the proper protection and reporting of possible exposures to Bloodborne Pathogens.

▼ Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp. to have employees made aware of the possible risks associated with Bloodborne Pathogens. The procedures below give a definitive course of action for all employees to follow.

▼ Procedure

A. PROTECTION & EXPOSURE GUIDELINES

The following procedures shall be adhered to in the event of a possible exposure to HIV/AIDS, Tuberculosis Infection, Hepatitis B (HBV), and/or Communicable or Infectious Disease.

An exposure to HIV or HBV occurs when an employee's blood has contact with certain infected bodily fluids including, but not limited to blood, semen, saliva, and vaginal fluids. Skin is a natural barrier to HIV and HBV; unless there is a break in the skin, there is a very low chance of transmission. To date, there have been no documented cases of job-related HIV/AIDS transmission to employees within the criminal justice field. Furthermore, since HIV and HBV can only be contracted through the exchange of specific body fluids, **PRACTICING UNIVERSAL PRECAUTIONS** will almost totally eliminate significant risk of infection.

An occupational exposure occurs when an employee has contact with body fluids of another in a way that makes transmission possible (e.g., blood contacts an open cut or wound). An employee who has been exposed shall follow the below procedures:

01. Cleanse the exposed area with a sanitizer, rubbing alcohol, and/or with liquid soap and water;
02. Seek medical attention immediately;



03. Notification of the exposure is to be made to your Immediate Supervisor;

04. Appropriate Workers' Compensation Forms are to be filed with your Immediate Supervisor as soon as possible.

A Supervisor who has been notified of a possible exposure shall immediately:

01. Make a preliminary evaluation to substantiate the possible exposure;

02. Verify the potential source of the exposure;

03. Interview that source;

04. Request their cooperation;

05. Document the entire incident on appropriate Worker's Compensation Forms and forward to the Employee Relations Manager.

On April 20, 1994, the Ryan White Act became effective (59 FR 13418). This federal regulation requires that medical facilities evaluate and **DISCLOSE** relevant information concerning emergency response employee (ERE) exposure to specified airborne and Bloodborne infectious diseases, including HIV. The disclosure is required even without the patient's consent because the Federal Law and Regulations preempt State Law.

Tuberculosis (TB) and certain other Communicable Diseases are transmitted via inhaled airborne droplets of sputum of infected persons. There is an effective Antituberculin Therapy which can be obtained from the Department of Health or private physicians. In the event an employee is exposed to a possible airborne contaminate, he/she is to follow the listed procedures on the previous page and Supervisors should follow their responsibilities listed above.

07-0035

HAZARDOUS MATERIALS

Purpose

The purpose of this Standard Operating Procedure is to establish that employees are familiar with First Responder Procedures for Hazardous Material Incidents.

Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp. to insure that employees are familiar with First Responder Procedures for Hazardous Material Incidents. The procedures below give a definitive course of action for all employees to follow.

Procedure

A. HAZARDOUS MATERIAL INCIDENTS

A Hazardous Material is a substance or material capable of posing an unreasonable risk to health, safety, and property. It shall be the Standard Operating Guideline of employees of the Company to react to **ANY** potentially Hazardous Incident as a Hazardous Materials Incident. It is better to over-react on the side of safety than to minimize a situation wherein rescuers and others become additional victims.

Rescue and/or containment must only be taken if the danger to life, health, or public safety is significant and such effort can be accomplished **WITHOUT** unreasonable risk to employees.

B. FIRST RESPONDER RESPONSIBILITIES

01. Stop and park far enough away from the incident scene so as not to introduce an ignition source;
02. Do not use a two-way radio or cellular phone until cleared to do so by an authorized member of the Haz-Mat Team;
03. Do not smoke and refrain from using flares or other ignition sources;



04. Stay upwind of the incident;
05. Assess the situation from a distance;
06. Notify the proper authorities such as, Law Enforcement, Fire/Rescue, or a Haz-Mat Response Team. Use a land line telephone from a safe distance;
07. Attempt to identify a placard identification number, label, container shape, shipping papers, or ascertain information from persons involved as to the contents of the materials and forward that information to the proper authorities;
08. Cautiously determine if any injured require medical attention and make the proper notification via **911**;
09. If you become contaminated, you must immediately notify emergency personnel on the scene for decontamination and isolation procedures;
10. Do not drive, walk into, or touch spilled materials;
11. Avoid inhalation of all gasses, fumes, and smoke even if no Hazardous Materials are apparently involved;
12. Never eat, drink, or smoke in the area of possible Hazardous Materials.

whenever a Bomb Threat is reported. The procedures below give a definitive course of action for all employees to follow.

▼ Procedure

A. BOMB THREAT RESPONSE

Bomb Threats are unfortunately a reality for many types of businesses. Whether the Bomb Threat is a hoax, a threat that leads to the finding of a bomb, or a detonation without warning, proper planning and training becomes important. While each Bomb Threat Plan is unique to the Specific Client Site Location, the basic steps of Bomb Threat Planning can be categorized as follows:

01. **Prevention** – steps that include access control, locking of sensitive areas such as computer rooms, air handlers, boiler rooms, telecommunication areas, loading docks, and also identifying suspicious individuals and their behaviors;
02. **Establishing Authority** – designating employees responsible for managing the crisis;
03. **Receiving the Threat** – procedures for obtaining pertinent information from the Bomb Threat Caller and obtaining information from the person who received the call. The flow of information needs to follow a clear effective process;
04. **Assessing the Threat** – analyzing the threat and calculating the need for response;
05. **Searching for the Bomb** – designating who should search for the bomb and establishing procedures for conducting the search;
06. **Evacuating the Building** – procedures for evacuation including a method to account for all involved;
07. **Terminating the Response** – protocol for determining when to declare an end to the situation;

07-0036 BOMB THREATS

▼ Purpose

The purpose of this Standard Operating Procedure is to establish the proper response for employees to take during a Bomb Threat.

▼ Standard Operating Procedure

It is the Standard Operating Procedure of CPI Security Corp. to have employees respond appropriately



08. **Documenting the Threat** – procedures for documenting the incident;

09. **Debriefing** – reviewing what happened.

B. RECEIVING A THREAT

Bomb Threats can be made in numerous ways. Methods include the use of notes, letters, telephone calls made to third parties such as the media, and calls placed directly to the Client Site Location. The latter is the most common way of communicating a Bomb Threat. When a threat is received, regardless of the method, it is important that as much information as possible is gathered and documented.

Those employees who are most likely to receive such calls should remember to remain calm, keep the caller talking as long as possible, and asking key questions such as; “Where is the bomb?”, “When will it go off?”, and “Why was it placed?” are all important. Notes of the conversation should be made. A Bomb Threat Checklist should be kept at **ALL** locations where calls are received such as security dispatch, information desks, switchboards, etc.

C. GENERAL INFORMATION

It is impossible to create a comprehensive Bomb Threat Plan within this Standard Operating Guideline that will completely cover all Client Site Locations. However, the outline below should be followed:

01. Use only landline telephones;

02. **DO NOT** use portable radios, cellular phones, or other wireless devices during a Bomb Threat Response. Turn these devices off until the situation has been cleared;

03. Call the appropriate Law Enforcement Agency via **911**;

04. **NEVER** touch a suspicious object. Evacuate and secure the immediate location and await arrival of the appropriate Law Enforcement Agency;

05. Contact your Immediate Supervisor and/or Client Site Representative and advise them of the situation;

06. Follow the established Bomb Threat Response Plan, if applicable, at your Client Site Location;

07. Assist Emergency Response Personnel as directed;

08. The Immediate Supervisor should notify the President/CEO as soon as possible;

09. After the incident has been cleared by an authorized Emergency Response Person, document the entire event on an Incident Report.

If you have any additional questions or require further clarification, please contact your Immediate Supervisor.