



SECURITY OFFICER HANDBOOK

Argonne National Laboratory

130 North Martinwood Drive
Knoxville, Tennessee 37932
(877) 546-2597

"Quality Service is Job One"



Forward

Security Walls is committed to providing a working atmosphere that is beneficial to you and to the Company. Security Walls believes that a good working relationship requires a cooperative effort. You will want to become familiar with Security Walls's corporate philosophy, work rules, personnel practices, and the benefits you may enjoy as a Security Walls employee. This Handbook has been prepared to acquaint you with some of the Company's policies and practices. It is important that you understand what is expected from you, and what you can expect from Security Walls. Please take the time to read this Handbook thoroughly.

This Handbook is not intended to and does not form, express or imply a contract regarding the duration, term or condition of employment. Furthermore, this Handbook does not alter the at-will relationship between Security Walls and an employee, nor does it guarantee employment for any definite period of time. This Handbook is only a guide and does not address in detail every situation that you are likely to face or have questions about. Many of Security Walls's procedures and benefits are specified by the contract of the account to which you will be assigned; consequently, make sure you consult with your Supervisor about what applies to your account. The Company retains the right to amend, suspend, interpret or cancel in whole or in part any of the published or unpublished policies and practices of the Company, without notice. The Company remains the final authority as to the proper interpretation and application of the provisions of this Handbook.

RECOGNITION OF THESE RIGHTS AND PREROGATIVES OF THE COMPANY, AND AGREEMENT TO ABIDE BY ALL COMPANY POLICIES, PROCEDURES AND RULES ARE TERMS AND CONDITION OF BOTH INITIAL AND CONTINUED EMPLOYMENT.

WELCOME

Welcome to the Security Walls team! It's an exciting time to be part of the company.

Security Walls thrives on a culture that's employee-focused. We take great pride in our reputation as the employer of choice for the security industry. We offer our employees training programs that enhance your professional skills as well as your personal development. In turn, we expect nothing short of excellence in the fulfillment of your important responsibilities. Your position is critical to Security Walls's ability to meet and exceed customer expectations and achieve overall success as a company. We look forward to the great work that you will do as part of the Security Walls team.

This handbook has been prepared to introduce you to a number of policies and practices that impact your role with the company. We believe that a good working relationship requires a cooperative effort, and we ask that you become familiar with our corporate philosophy, work rules, personnel practices and the many benefits you will enjoy as a Security Walls employee.

If you have any questions, please don't hesitate to reach out to your supervisor.

Again, welcome to the beginning of what we hope is a long and rewarding work experience for you! We're proud to have you on the team!



Juanita Walls
Chief Manager

Table of Contents

HISTORY & MISSION	1
SECURITY WALLS: A BRIEF HISTORY	1
MISSION, OBJECTIVE, EXPERIENCE	1
YOUR ROLE AS A SECURITY OFFICER	3
PERSONAL APPEARANCE AND PUBLIC PERCEPTIONS.....	3
UNIFORMS.....	4
ID CARDS AND LICENSES/REGISTRATION.....	5
CURRENT PERSONAL INFORMATION.....	5
YOUR WORK DAY	6
YOUR FIRST ASSIGNMENT.....	6
REPORTING FOR DUTY	6
ON-DUTY PROCEDURES	6
END OF SHIFT RESPONSIBILITIES	7
CALLING-OFF FROM DUTY.....	7
YOUR MOST IMPORTANT CONTRIBUTION – CLIENT SATISFACTION.....	7
GENERAL PERFORMANCE GUIDELINES	8
EMPLOYMENT BASICS	9
EMPLOYER/EMPLOYEE AT-WILL RELATIONSHIP	9
EQUAL EMPLOYMENT OPPORTUNITY POLICY.....	9
OPEN DOOR POLICY	9
CONCERN RESOLUTION PROCESS.....	10
YOUR PERSONNEL FILES AND INFORMATION	10
PERFORMANCE EVALUATIONS	11
CRIMINAL RECORDS	11
TERMINATION OF EMPLOYMENT (VOLUNTARY AND INVOLUNTARY).....	11
SOLICITATION & DISTRIBUTION OF LITERATURE	11
NO-FRATERNIZATION.....	12
WORKPLACE INJURY AND SAFETY.....	12
WORK OUTSIDE SECURITY WALLS	12
RULES/STANDARDS OF CONDUCT	13
EMPLOYEE CONDUCT AND WORK RULES	13
PROGRESSIVE DISCIPLINE.....	14
POLICY AGAINST HARASSMENT AND DISCRIMINATION.....	14
DRUG AND SUBSTANCE-FREE WORKPLACE.....	15
INTERNET, TELEPHONE AND ELECTRONIC USAGE.....	16
LOSS / DAMAGE TO PROPERTY/FURNISHINGS OF CLIENT OR SECURITY WALLS	16
CODE OF ETHICS & BUSINESS CONDUCT GUIDELINES	17
OVERVIEW	17
OUR CONDUCT IN THE WORKPLACE	18
<i>Equal Employment</i>	18
<i>Freedom from Harassment</i>	18
<i>A Safe Environment</i>	18
MAINTAINING CONFIDENTIALITY	19
<i>Confidentiality</i>	19
RESPECTING PROPERTY	19
<i>Use of Resources</i>	19
AVOIDING CONFLICT OF INTEREST	20
<i>Activities and Relationships beyond Security Walls</i>	20

<i>Entertainment, Gifts and Gratuities</i>	20
OBEYING THE LAW.....	21
<i>Regulatory Obligations</i>	21
<i>External Audits and Reviews</i>	21
<i>Illegal Activities</i>	22
<i>Antitrust and Unfair Competition</i>	22
<i>Political Contributions</i>	22
<i>Sales, Marketing and Advertising Standards</i>	22
<i>Copyright Law</i>	23
<i>Recordkeeping and Preservation of Records</i>	23
RESPONSIBILITIES AND CONSEQUENCES.....	23
<i>Employee Responsibilities</i>	23
<i>Reporting Suspected Violations</i>	23
<i>Resolutions, Communication and Non-Retaliation</i>	23
<i>Consequences of Violations</i>	24
WHERE TO FIND ANSWERS TO YOUR QUESTIONS.....	24
<i>Additional Ethics and Compliance Resources</i>	24
COMPENSATION AND BENEFITS.....	25
CLASSIFICATION OF EMPLOYEES.....	25
WAGES AND PAY.....	25
RECORDING HOURS WORKED.....	26
DEDUCTIONS FROM PAY CHECKS.....	26
HOLIDAYS.....	26
VACATION.....	26
LEAVES OF ABSENCE.....	27
IMPORTANT TELEPHONE NUMBERS.....	32
RECEIPT OF EMPLOYEE HANDBOOK (INCLUDING CODE OF ETHICS).....	33

History & Mission

A Brief History

Security Walls LLC is a certified small disadvantaged, minority (Black American), and 100% woman owned business, with 8(a) certification. Also, Security Walls is certified with the Tennessee Department of Transportation, Disadvantaged Business Enterprise (DBE).

Security Walls, LLC was established in June 2003 specializing in complete security and investigative services. The investigative team of Security Walls, LLC exceeds 20 years experience. Juanita M. Walls, Chief Manager of Security Walls, LLC is a retired Federal Bureau of Investigation (FBI) Special Agent with experience in conducting high level background investigations that included:

- United States Presidents
- United States Cabinet Members
- United States Senators (in New York and Tennessee)
- Tennessee Valley Authority Directors
- Security Clearance for Personnel of government facilities

Security Walls, LLC is a licensed Private Investigation Company with the State of Tennessee Private Investigation and Polygraph Commission. Key personnel are licensed as Private Investigators with the State of Tennessee Private Investigation and Polygraph Commission and members of the Tennessee Professional Investigators Association.

Juanita Walls was recently honored with the 2003 National Leadership Award as Honorary Chairman on the Business Advisory Council for the National Republican Congressional Committee and also honored as "Businessman of the Year" in 2004 from Knoxville, Tennessee by Congressman Tom Delay, Majority Leader.

MISSION STATEMENT

To provide security and investigative services that will be reliable, comprehensive and complete. The character of Security Walls, LLC is designed to foster personal, professional and corporate growth using teamwork, safety and integrity. Together, we will make a safer work environment for you.

OBJECTIVE

In today's environment, the protection of people, information and assets is critical to survival of corporations, both large and small. The dramatic losses an organization experiences are frequently investigated, but seldom publicized. However, losses that are not identified or investigated may cause the most harm. The impact may be devastating to the company's reputation, profitability, even its ability to survive. The objective of Security Walls, LLC is to mitigate business risk to corporations, government agencies and the legal community. The investigative issues are researched and analyzed thoroughly

through the use of our internal and other proprietary resources. This research establishes a solid foundation in which to build an investigative case.

Due to our proven track record and extensive investigative experience, we have established a solid reputation, not only with the business community, but also with law enforcement agencies and prosecutors at all levels of the government.

Security Walls, LLC will identify, prioritize and manage risk to the personnel, customers/clients and assets of a business. We will provide security consulting services to government, corporate clients and private individuals. Through various processes, Security Walls, LLC will assess the threats facing a company, evaluate existing protection system against those threats and determine the most cost-effective means to provide protection that fit both the company's culture and the nature of the business.

EXPERIENCE

Security Walls, LLC exceeds 20 years of experience in the security field. Our investigative team is comprised of a unique blend of investigators from backgrounds in corporate Security, Intelligence and specialized Law Enforcement with collective experience investigating issues both domestic and international.

YOUR ROLE AS A SECURITY OFFICER

At all times while working for Security Walls, you remain solely an employee of the Company. In order to maintain the professionalism and high quality of the Security Walls corps of Security Officers, there are certain rules, policies and procedures that apply to all officers, including those in this Handbook.

Personal Appearance and Public Perceptions

Your position requires that you be in constant contact with the Company's clients and the public. You must understand the importance of your position, the need for a positive attitude, good appearance and personal hygiene and the ability to exercise self-control. These items are therefore actually tools of your trade, and enhance your ability to

- Look and act as a professional
- Create a good impression
- Project your competence and job knowledge
- Provide deterrence against crime and infractions
- Secure the willing cooperation of others in abiding by rules and regulations
- Promote good public relations

As a result, your appearance will help determine the level of respect you command, and the public's impression of Security Walls. The following minimum standards are, therefore, mandatory:

Hair

- Must be neatly cut and groomed.
- For men, must not extend past the shirt collar or cover the ears.
- For women, long hair should be combed away from the face and secured for your safety. Any hair accessory must be conservative and complimentary to the uniform.
- Hair sculpting or extreme hairstyles are not permitted.
- Extremes in dyeing, bleaching or tinting are not permitted, and when done must be in a natural color.

Facial Hair

- Sideburns must be neatly trimmed and cannot extend past the bottom of the earlobe.
- Mustaches must be neatly trimmed and conform to the contours of the face.

Personal Grooming

- Women are permitted to use conservative makeup, as determined by your supervisor.
- Fingernails are to be kept clean and trimmed. Women may use nail polish in a conservative manner and color.
- Use of a deodorant or antiperspirant along with regular bathing is required due to the constant interaction with others.
- Cologne, aftershave and perfume are permitted only in minimal amounts.

Jewelry

- Only one ring per hand is permitted, and it must not be unreasonably large.
- Watches and tie clips are permitted, but bracelets and chains are not.
- Women are permitted to wear one set of post-style earrings that may not be larger than a dime. Men are not permitted to wear earrings.
- Other than the earrings and rings noted above, no other visible rings or jewelry are permitted on the body (tongue, brow, nose, etc.).
- The only items permitted to be on a Security Walls uniform during working time are issued name tags and Security Walls issued service pins.
- As with all permitted personal property brought into the workplace, you assume all responsibility for the loss or damage of such item.

Other Items

- Hats are not permitted except where issued as part of the uniform.
- Eyeglasses are to be conservative in style. Sunglasses are only permitted while on outside duty during sunny weather and only where they do not interfere with your duties of observation and detection.
- All footwear shall be clean, in good repair and polished when applicable. Your supervisor may issue you specific footwear requirements depending on your assigned location.

Uniforms

A primary duty of a Security Officer is to serve as a deterrent to criminal activity. Your uniform will serve as one of your most important tools in maintaining this deterrent effect, along with being alert and practicing the grooming standards noted above.

Upon your hire, you will be issued a uniform and instructed on its use and requirements. The specific uniform issued to you will vary depending on your assigned account and time of year. Please inform the person issuing you the uniform or your supervisor if you find that some or all of your uniform does not fit – again, your appearance in your uniform is of critical importance. Your uniform must be appropriately cleaned and pressed. You are to make minor mends to your uniform (hemming, buttons, etc.), but any significant repair or damage is to be reported to your supervisor.

The uniforms issued to you are in excellent condition. Upon your separation from the Company, you are expected to return the uniform in the same condition allowing for normal wear and tear. Where permitted by local law, the Company may deduct monies from your paycheck to be held as a security deposit against the uniform. In the event that some or all of your uniform is lost, stolen, abused or damaged or otherwise not returned to the Company upon your separation, the Company reserves the right to hold you financially responsible subject to applicable law. Similarly, the Company may issue you equipment to perform your job duties (radios, flashlights, safety gear, etc.), and you will be held to the same requirements of returning them in good condition or you may be held financially responsible.

ID Cards and Licenses/Registration

Identification (ID) Cards may be issued to employees based on their work location. The ID card enables you to identify yourself to clients, other employees, local and state authorities, and to the general public.

- ID Cards must be carried at all times while working.
- Validation of ID Cards may be required annually.
- Lost ID Cards must be reported to your supervisor so that a replacement card may be issued.
- ID Cards are to be returned upon separation from the Company.

Local licensing regulations require you to have in your possession a state issued security guard license or registration card.

Current Personal Information

You are responsible for notifying your supervisor whenever you change your name, address, telephone number, marital status, or number of dependents. Incomplete and outdated information could interrupt receiving pay and benefits for you and your family, cause inappropriate amounts of tax to be withheld from your pay, and cause difficulty in notification in case of an emergency or for scheduling changes.

YOUR WORK DAY

Your First Assignment

The recruiting personnel who hired you will notify you of your first work assignment, including the name and location of that assignment, the day and time that you are to report, and with whom you are to check in. You must make sure that you completely understand all of the information that is given to you and that you are able to be at the designated location on time.

Reporting For Duty

Prior to reporting for work you should be **prepared** – clean uniform and shoes, properly groomed and carrying a pocket-sized notebook and pen. You should perform a **self-inspection** – no torn uniform items, no missing buttons and in full gear. Finally, you should be **ready** for work –mentally prepared, rested and alert, and even-tempered.

You are responsible for providing your own transportation to and from work. You must report to work in your full uniform. Also, you must be ready to begin working promptly at your assigned start time, not just then getting to your location. It is imperative that you are on time – we cannot have any gaps in coverage of our clients' security needs, and the person you are relieving is depending on you to be on time as well. Based on your work assignment, you will sign in which will be explained to you by your supervisor.

On-Duty Procedures

As noted above, there are general requirements for Security Walls officers found in your training materials and in this Handbook. The basic functions of a Security Walls officer are as follows:

- DETER:** to serve as a general security presence and visible deterrent by continually performing your duties in an alert, professional manner.
- DETECT:** suspicious activities.
- OBSERVE:** criminal acts or rule infractions at or near your post which may be a threat to the facility, the client or employees at your work site.
- REPORT:** all incidents, accidents or medical emergencies to the appropriate persons including your supervisor, in a timely manner.

The person who directs you on a daily basis will be a Security Walls Supervisor or site/shift supervisor. Always pass new instructions or developments on to the officer relieving you. As an employee of Security Walls, you will also represent the client's management to the public. Maintain cordial and professional relations with the client's employees at all times, while avoiding over-familiarity.

End Of Shift Responsibilities

In order to properly leave your post at the end of your scheduled shift, you must be "relieved." Proper "relief" can be either 1) replacement by another officer who assumes your post or 2) the end of your shift when no other officer is assigned to secure your post.

If you are waiting to be relieved by another officer, and he or she does not arrive on time, you are required to stay on the post and wait for his or her arrival or for further orders. After fifteen (15) minutes has passed from the time the officer was scheduled to report, you are to call the designated office telephone number for further instruction. Your Supervisor will be contacted to secure appropriate relief coverage for you. **AT NO TIME IS AN ASSIGNED POST TO BE LEFT UNCOVERED.**

Security Officers who are off duty should not return to non-public areas on customer premises.

Calling-off From Duty

Security officers such as you are different in one very important respect from employees of other companies such as restaurants, factories, etc. Most companies can make adjustments for late or absent employees because they have other employees available to cover for the absence. This is not true for Security Walls given the nature of our business. Our clients require that we provide a person at designated posts for specific periods of time. So, whether you are working as the only officer at a site or one of a number assigned to different posts at a large account, the impact of your tardiness or absence is the same. Security Walls does not have a reserve of officers standing by to fill absent posts. Rather, if you are absent, an officer may be required to be held over on your assigned post from his or her earlier shift, and/or your supervisor will be required to scramble to find a replacement officer.

As such, it is absolutely critical that you give your supervisor as much notice as possible of your expected absence or tardiness on an assigned shift. At a minimum, you are required to telephone the designated person (as explained to you by your supervisor) at least four (4) hours prior to your assigned shift if you will be absent due to illness or injury. Security Walls may request documentation to substantiate your absence at any time. If you are absent for three (3) days or more due to illness or injury, Security Walls will require that you provide a written medical certification to return to work.

Failure to adhere to this policy – by 1) calling off for non-medical reasons; 2) failing to call off in any manner; 3) failing to call off at least four (4) hours in advance for medical reasons; or 4) being late for an assigned shift – may result in disciplinary action up to and including termination for flagrant or repeated violations.

Your Most Important Contribution – Client Satisfaction

Please remember that your work and Security Walls's service is ultimately judged by our clients. The most important contribution that you can make is to satisfy or delight the customer with your service. Keep in mind that "quality" is in the eye of the beholder, in this case the client. Security Walls and its employees will always seek to exceed our clients' quality expectations. The first step in doing so is to follow the policies, rules and

procedures given to you in this Handbook, your post orders and in your training. Keep in mind what it is that the Company and you are providing to the client – Security. Security of persons, property and information has never been more important given the current security developments in our country. Consequently, your failure to follow Company rules, policies and procedures could result not only in client dissatisfaction, but also in a serious breach of client Security.

General Performance Guidelines

All Security Officers, regardless of assignment, will be held to the following minimum performance standards in addition to site and position-specific requirements.

- Arrive on time for your assigned shift in proper uniform and ready to work.
- Work your post in a courteous, disciplined manner; be neat, clean, well-groomed and in proper uniform at all times, and be alert to events within sight and hearing.
- Know the operational procedures at your site and the duties of your post.
- Never leave your post until properly relieved.
- Receive, obey and pass on all orders from your supervisor and/or client.
- Limit your conversation to your duties. Avoid distractions.
- Observe all safety standards and guidelines.
- Initiate alarm procedures and notify the proper authorities in case of fire, intrusion, or other emergency.
- Be especially alert at night and on weekends, challenging – in a firm but courteous manner – and identifying all persons at or near your post.
- Allow no one to enter or leave the client's site – or carry property away – without proper identification and/or authorization.
- Maintain your notebook and the log/journal as a permanent record of all violations of safety/security regulations or other unusual incidents. Always complete incident reports in an accurate, legible, clear and timely manner.
- Maintain the cleanliness of your post. Eating, drinking, smoking and reading are not allowed except where specifically authorized.

EMPLOYMENT BASICS

The Company reserves the right to change, suspend or cancel in whole or in part any of its published or unpublished policies or practices, including those contained in this Handbook. Recognition of these rights and prerogatives of the Company, and your agreement to abide by all Company policies, procedures and rules, are terms and conditions of initial employment and continued employment.

Employer/Employee At-Will Relationship

Security Walls is an at-will employment company. This means that the employment relationship with you can be terminated with or without cause, at any time, by you or the Company. All employees will, in consideration of their employment, conform to the rules and policies of the Company, some of which are set forth in this Handbook and others which will be communicated to you in training and through your supervisor. No supervisor or representative of the Company except the Chief Manager has authority to enter into any agreement for employment for any specified period of time, or to make any adjustment to this At-Will policy. Security Walls further reserves the right to make any change to your assigned job-site and/or shift at the complete discretion of the Company.

Equal Employment Opportunity Policy

The Company is an Equal Opportunity Employer and does not unlawfully discriminate against any employee or applicant on the basis of race, creed, color, national origin, sex, age, disability, marital status, sexual orientation or preference, citizenship status, religion, veteran status, or any other legally protected status. This policy applies to all employment decisions including, but not limited to, recruitment, hiring, compensation, training and apprenticeship, promotion, upgrading, demotion, downgrading, transfer, lay-off and termination, and all other terms and conditions of employment. All decisions regarding conditions of employment will be based on the individual's overall qualifications and his or her ability to meet the requirements of the position.

Open Door Policy

The Company encourages all employees to bring any questions, problems and recommendations to the attention of any member of management at any time. The Concern Resolution Process described immediately below addresses what to do when you have a problem or complaint. Apart from that process, the Company welcomes your input as to how to further improve the level of our customer service. All of our ideas together will help us achieve our Company objectives including our commitment to remaining an employer of choice.

Concern Resolution Process

It is the Company's policy to provide employees with an opportunity to raise questions, solve problems and communicate work-related complaints through a Concern Resolution Process. An employee should use this process to raise and resolve any problem or circumstance that prevents the employee from performing his or her job. In addition, an employee may use this Process to raise issues of harassment, discrimination or unfair treatment on the job. Some examples of matters which may be raised through the Concern Resolution Process include but are not limited to: assignment of hours, fairness of disciplinary actions, and harassment in the workplace, inability to get along with co-workers, pay discrepancies and workplace safety.

When problems arise, employees are expected to bring concerns to their supervisors informally through a meeting or an on-the-job discussion. In most cases, this should resolve the concern. If not resolved, or if you believe that the matter cannot be raised with your supervisor, the Concern Resolution Process provides that you take it to the Chief Manager, to discuss the situation and desired solution.

At any time, you have concerns you may contact the Corporate Headquarters at (877) 546-2597.

- **Do not feel comfortable contacting the supervisor;**
- **Do not feel your concern was appropriately addressed;**
- **Do not have the contact information for the appropriate person;**
- **Have not received a response to your concern within 10 business days.**

You can also use this email address operator@securitywalls.net to take reports or complaints 24 hours a day, 7 days a week.

No employee will be treated unfairly for using the Concern Resolution Process. Retaliating against an employee for using this Process in good faith is a violation of Company Policy and any person (including Management and Supervisors) doing so is subject to discipline, up to and including termination of employment.

Your Personnel Files and Information

The corporate office is responsible for maintaining your employment records, which begin with your job application. Performance appraisals, promotions, transfers and other matters that affect you as an employee are recorded here. It is important that your employment record always be up to date. You should notify your supervisor within 48 hours of changes in name, address or telephone number.

Personnel files are the confidential property of the Company, and access to the information they contain is restricted. There is always a risk that personal data may be compromised by factors outside of the Company's control; additionally, certain circumstances may require the Company to disseminate information in response to legal authorities. As a result, while the Company considers personal data of its employees as highly confidential, such information is not guaranteed to be maintained confidential.

Performance Evaluations

Supervisors and employees are strongly encouraged to discuss job performance and goals on an informal day-to-day basis. A formal written performance evaluation will generally be conducted at the end of the first year of employment. Additional formal performance evaluations will usually be conducted annually thereafter. These evaluations are conducted to provide both supervisors and employees the opportunity to discuss job tasks, identify and correct weaknesses, encourage and recognize strengths, and discuss positive approaches for meeting assigned goals. (The decision to award pay adjustments is dependent upon numerous factors, including the performance documented in these evaluations and client contractual pay requirements.)

Criminal Records

Security Walls will not knowingly hire or retain employees who have been convicted of a felony or other specified offense as outlined in applicable state licensing laws. (The screening process and disqualifying offenses may vary state by state.) As part of the screening and interview process, applicants will assist the Company in completing a criminal history check. A disqualifying offense found in a criminal record check will result in an applicant not being hired, or in the termination of a current employee. Failure of an employee to disclose a criminal conviction in his/her application will result in termination regardless of whether the conviction is a disqualifying offense under applicable law.

In the event that a current employee is arrested while employed, the employee MUST IMMEDIATELY INFORM his/her supervisor. A Company Review Panel will be convened to review the circumstances of the arrest. The Company Review Panel will meet with the employee to review the facts, hear the individual's version of the incident and then make a decision on the appropriate action to be taken, including possible termination.

Termination of Employment (voluntary and involuntary)

Any employee who is terminated by the Company for disciplinary or performance reasons will not be considered for future employment. Employees who voluntarily leave Security Walls are asked to notify their Supervisor in writing of their intent to resign at least two weeks prior to the separation date. Failure to abide by this request may result in your not being considered for future employment with the Company.

Solicitation and Distribution of Literature

Employees are not allowed to engage in solicitation for any purpose or to distribute material of any kind during working time, i.e., when employees are on duty and supposed to be working. In working areas, distribution is prohibited at all times. Non employees are prohibited at all times from soliciting employees for any purpose and/or distributing material of any kind on Security Walls property.

No-Fraternization

Security Walls generally prohibits individuals from being in a supervisory capacity over family members or those with whom they have a sexual or romantic relationship. Should you find yourself in a situation where you are dating or having a sexual/romantic relationship with a supervisor, client or subordinate, you must immediately bring it to the attention of your Supervisor. Violation of any of the foregoing requirements will lead to disciplinary action up to and including possible termination. This policy does not prohibit relationships outside of work between co-workers with no supervision overlap; however, you are cautioned to fully review and understand the Company's Sexual Harassment and Discrimination Policy as it may impact these types of relationships.

Workplace Injury and Safety

The Company is concerned for your safety and well-being in the workplace. You are directed to immediately (within 24 hours) report any workplace injury, no matter how minor you might think it is, to your Supervisor. Failure to do so may jeopardize your rights under the Workers' Compensation system. To the extent that you require medical attention following an injury, your supervisor will assist you in obtaining the appropriate medical attention, whether on an emergency basis or otherwise. If you require medical attention or miss work due to a workplace injury or accident, you will be provided Workers Compensation including medical care and/or wage replacement, as dictated by individual state requirements. As a material term and condition of your initial and continued employment with the Company, you agree that in the event of a workplace accident or injury, you will seek coverage and compensation under Workers Compensation and you will not sue a Company client or otherwise look to the client for compensation.

You are also directed to report a "close call" – an unsafe practice or condition that may lead to or might have led to injury – so that we can take action to prevent actual injury. A safe workplace benefits everybody – you, the Company, the Client and the public who comes onto your work site. You are the most important tool in helping us achieve a safe workplace – you are on the site on a daily basis and will know best those situations that may give rise to accident or injury. We encourage you to take an active and serious role in helping us achieve this goal.

Work Outside Security Walls

In the situation where you, as a Security Walls employee, work a second job for one of the Company's competitors, or if you become a former Security Walls employee working for a competitor, you remain obligated to respect Security Walls's confidentiality provisions.

RULES/STANDARDS OF CONDUCT

Employee Conduct and Work Rules

Reasonable rules of conduct are necessary for the orderly, efficient and safe operation of the Company's business. The following list identifies conduct that will result in disciplinary action. (It should be noted that many of these items are addressed in greater detail in the appropriate section of this Handbook and may be referred to for clarification.)

This list is not intended to be all-inclusive, and the Company reserves the right to take disciplinary action up to and including termination with an employee for conduct not included here or to modify and revise this list.

1. Theft or purposeful damage of Company, Client or other employee property;
2. Intentional manipulation of funds or inventory (e.g., deposit theft; petty cash) or intentional falsification of information (e.g., labor hours, training hours, billing, incident reports);
3. Gross abuse of a client or employee (physical, verbal, or otherwise), including fighting or disorderly conduct on or near Company/Client property or in company uniform at anytime;
4. Possession or consumption of illicit drugs at any time or possession or consumption of alcohol on Company business or premises, or arriving to work intoxicated or under the influence;
5. Driving a vehicle for Company purposes while under the influence of illegal drugs or of alcohol;
6. Gross insubordination or misconduct on Company/Client premises;
7. Serious violation of any statute, regulation or rule established by either Company policy or by local, state or federal governmental authority;
8. Sexual or other harassment;
9. Unauthorized possession of weapons or firearms on Company property, or while on Company business;
10. Serious violation of policy which results in the loss of funds, injury or death of an employee, client or other person;
11. Dating client, client employees or subordinate without disclosing it to a supervisor;
12. Accepting a gift or gratuity from a client that exceeds \$100 in value without supervisor approval;
13. Failure to report for work without proper notification;
14. Disclosure or making available to unauthorized persons any confidential or proprietary information;
15. Having been convicted of a criminal offense as outlined under Company policy / state regulations;
16. Failing to provide information regarding criminal activity and or failing to cooperate in an investigation;
17. Entering unauthorized client or tenant areas without permission from your supervisor or Client;
18. Leaving the post without permission from your supervisor;
19. Refusal to follow lawful instruction of a supervisor;

20. Inappropriate, abusive, offensive or aggressive language to clients, public or fellow employees;
21. Unexcused failure to report or call off without giving four (4) hours notice; repeated absences or tardiness;
22. Failure to perform job duties satisfactorily;
23. Negligence or carelessness with client/company property or violation of established safety rules;
24. Unauthorized use of Company/ Client property or equipment (i.e. telephone, computers) or Company/Client vehicles;
25. Allowing unauthorized persons or pets on company or client premises;
26. Sleeping or dozing while on duty (including lunch and breaks);
27. Possessing radios, televisions or reading materials at assigned post without proper authorization;
28. Refusal to accept assigned overtime when necessary;
29. Abuse of break or meal periods;
30. Violation of any site post orders.

Progressive Discipline

Disciplinary action will be taken when Company policies, procedures and work rules are violated. It is the policy of the Company to handle all employee performance deficiencies and misconduct in a consistent, timely and equitable manner, free from emotional overtones or personality differences. Generally, this policy is to be effected by use of progressive discipline. There are four basic elements in the progressive discipline process, as follows:

1. **Oral Warning**
2. **First Written Warning**
3. **Final Written Warning**
4. **Termination After Suspension & Investigation**

These steps will be used in a progressive manner consistent with the severity of the policy violation and/or performance problem. However, the Company reserves the right to skip any step, in whole or in part, and move immediately to any further step, including termination after suspension and investigation, as it deems necessary. Consequently, no employee may rely on these guidelines as "promises" or "agreements" by the Company to impose the discipline contained in the guidelines in any situation or prior to termination. Termination may occur without use of progressive discipline and without prior notice.

Policy Against Harassment and Discrimination

In accepting employment with Security Walls, you are deemed to fully understand that Sexual Harassment and Discrimination are **not** tolerated and that

- The Company will provide you with an environment free from unwelcome sexual overtones, and from discrimination.
- Discrimination refers to treating someone differently due to a person's race, creed, color, national origin, sex, age, disability, marital status, sexual orientation or preference, citizenship status, religion, veteran status, or any other legally protected status.

- Sexual harassment refers to unwelcome conduct of a sexual nature which may include:
 - repeated offensive sexual flirtations
 - repeated unwelcome advances or physical contact
 - repeated propositions
 - continued or repeated verbal abuse of a sexual nature
 - repeated graphic or degrading verbal comments of a sexual nature about an individual or his/her appearance
 - repeated displays of sexually suggestive objects, material or gestures
- Sexual harassing conduct is always wrong whether committed by co-workers, supervisors, clients or the public.
- If you yourself act in any manner that is a violation of this Policy Against Harassment and Discrimination, you will be subject to discipline up to and including possible termination, as described above in the Progressive Discipline Policy.
- **If you are subjected to or have knowledge of sexual harassment or discrimination, you are to report it immediately to your supervisor or by following the Concern Resolution Process described in the "Employment Basics" section of this Handbook.**
- Retaliation by any employee against another for having made a good faith complaint of harassment will not be tolerated by the Company.

Drug and Substance-free Workplace

Security Walls has a legal and moral obligation to maintain a safe and hazard-free work environment for all employees. The Company recognizes that drug and alcohol abuse can be a key contributor to work environment safety and employee health problems. Drug and alcohol abuse can result in decreased productivity, judgment, and/or quality of task performance that may ultimately be a factor in increased accidents, medical costs, absenteeism and workers-compensation costs. Consequently, it is Security Walls' goal to provide a workplace free of illegal drugs and alcohol abuse.

In order to accomplish this goal, the Company tests all applicants upon initial employment and also tests current employees on a random basis or annual bases (based on client contracts), and for reasonable cause, where permitted by law. A verified positive test with no reasonable medical explanation will result in an applicant being denied employment and termination for current employees. Refusal to submit to a drug test will be treated as though a positive test has occurred and the employee will be terminated. In addition to these testing requirements, the Company will also enforce the following rules:

- The manufacture, possession, use, purchase or distribution of illegal drugs or controlled substances, or paraphernalia associated with the same, is strictly prohibited.
- The use of alcohol by an employee on Company property, at a work location, in a Company vehicle or during work hours is prohibited. (Any exception for a Company social function must be approved by the Security Walls Chief Manager).

- Reporting to work or working while intoxicated or under the influence of any unauthorized controlled substance or illegal drug is prohibited.
- Any employee who is taking a prescribed or over-the-counter medication that may impact their ability to perform their job must immediately inform their supervisor.

Confidentiality

All matters concerning an individual and this Policy will be handled in a confidential manner, and information will be disseminated on a "need to know" basis only. All medical records (such as drug and alcohol tests) will similarly be treated with the required confidentiality.

Self-referral

Security Walls encourages any employee with a drug or alcohol abuse problem to voluntarily seek treatment. The Corporate office will assist employees who voluntarily seek help by referring them, when possible, to counseling and treatment services. All costs associated with the counseling and/or treatment is the sole responsibility of the employee, although counseling and treatment may be covered by an employee's medical insurance where available.

A decision to seek such assistance will not be used as the basis for disciplinary action and will not be used against the individual in any disciplinary proceeding. On the other hand, using a counseling or treatment program will not be a defense to the imposition of discipline for any previous or subsequent violation of the policy or rules listed above.

Internet, Telephone and Electronic Usage

As part of your work responsibilities, you may be assigned the use of a computer, radio, telephone or other communication device. Use of such devices is restricted solely to Company business purposes. Using such items for personal reasons is strictly prohibited unless approved by your Supervisor on a case-by-case basis. You are advised that the Company monitors such equipment to enforce this Policy – that is, you should have no expectation of privacy while using such devices. You will be held responsible for violations of this policy, including using the equipment in a harassing or intimidating manner, and may include both disciplinary action and financial reimbursement to the Company for unauthorized use.

Loss / Damage to Property/Furnishings of Client or Security Walls

Property belonging to Security Walls, fellow employees or the Client may not be borrowed, destroyed, taken, damaged or loaned by employees. Any employee, who damages, destroys, or misuses such property will be subject to disciplinary action and may be held financially responsible for the value of the damage, theft or misuse.

CODE OF ETHICS & BUSINESS CONDUCT GUIDELINES

Overview

Security Walls is governed by the conviction that business conduct is equally important as business performance. Your behavior in the workplace affects our success and shapes our reputation. It also communicates our stance on ethics, integrity, and honesty to those we service. Consequently, we must strive to maintain the highest ethical standards when carrying out our daily work activities.

To help us meet this goal, Security Walls has established a set of business conduct guidelines based on the Company's Code of Ethics. These basic principles provide a framework for our business decisions; use them as a guide to support the Company's values and fundamental commitment to fostering an ethical work environment.

Our conduct in the workplace: We treat fellow employees, customers, suppliers, the public we serve, and other stakeholders with fairness, honesty and respect. This includes refraining from gender, racial or other bias, or sexual or other harassment. We treat others in the way we would wish to be treated.

Maintaining confidentiality: We honor the privacy of employees' personal information just as we expect our privacy and that of our customers to be protected. In addition, we promise to protect trade secrets and the confidential information that belongs to Security Walls and its customers, and refrain from divulging information that could be harmful to the Company and its clients, or that could provide an advantage to competitors.

Respecting property: We treat company and customer property as just that – company and customer owned, and thus worthy of respect. We protect and preserve both and refrain from using them for personal gain.

Avoiding conflict of interest: While employed at Security Walls, our loyalty is to the Company. We refrain from any associations or activities that might conflict with the Company's interests. We also avoid doing business with competitors and accepting or giving excessive gifts to vendors or customers. We do not take advantage of our association with Security Walls for personal gain and avoid actions or relationships that might give even the appearance of a conflict of interest.

Obeying the law: We must always uphold the law while working at Security Walls. This includes, for example, obeying all state and local licensing regulations governing the Private Security trade and work as a Security Officer. Drug use, fraud, theft, embezzlement, price-fixing, bid-rigging, allocation of customers, or any other illicit activities are grounds for immediate termination and possible prosecution by public authorities.

Our Conduct in the Workplace

We treat fellow employees, customers, suppliers, the public we serve, and other stakeholders with fairness, honesty and respect. This includes refraining from gender, racial or other unlawful bias, or sexual or other harassment. We treat others in the way we would wish to be treated.

Equal Employment

Security Walls believes in making all employment related decisions, including but not limited to hiring, promoting, and compensating employees without regard to race, color, national origin, age, gender, religious preference, marital status, veteran status, sexual orientation, handicap, disability or other legally protected status. We are committed to equal employment practices and comply with all laws, regulations, and policies related to non-discrimination.

Freedom from Harassment

Security Walls does not condone any form of harassment. This includes harassment based on race, color, religion, gender, national origin, age, sexual orientation, disability, or any other basis protected by law. Employees must report violations to Security Walls Corp Office at (877) 546-2597.

Remember, harassment means different things to different people, so we must refrain from any offensive or inappropriate behavior. Examples of inappropriate behavior may include degrading jokes or images, intimidation, slurs, and verbal or physical sexual harassment, including offers or requests for sexual favors. Reports of harassment will be promptly investigated, and employees engaging in this behavior will be disciplined.

Retaliation by any employee against another for having made a good faith complaint of harassment will not be tolerated by the Company, and is itself a violation of this Code of Ethics.

A Safe Environment

We are all responsible for creating a safe working environment at Security Walls. Use safety devices and report any potential or actual hazards to your supervisor. Hazards include security violations or criminal activity that take place on company premises. In addition, any injuries or work-related illnesses must be reported to your supervisor within 24 hours of occurrence.

Violence has no place in the workplace and will not be tolerated. This includes intimidation, horseplay, violent acts, and threats of violence.

Maintaining Confidentiality

We honor the privacy of employees' personal information just as we expect our privacy and that of our customers to be protected. In addition, we promise to protect trade secrets and the confidential information that belongs to Security Walls and its customers, and refrain from divulging confidential information and other information that could be harmful to the company and its clients, or that could provide an advantage to competitors.

Confidentiality

Security Walls is committed to preserving the right of privacy for all our employees and customers, and to protecting our collective interests. The following information is considered confidential. Be sure to follow all applicable laws and company policies when using or sharing such information:

- Employee information, including personnel files, background checks, psychological assessments, and medical information;
- Business information, including but not limited to financial, marketing and statistical data, pricing, competitive information, including the identity of customers and pricing information, budgets, processes, techniques, contemplated or pending mergers, acquisitions or significant reorganizations, bid proposals to prospective customers and contract negotiations with prospective and current customers, research and development, and business reports and summaries. Such information, whether company-specific or customer-owned, is referred to as confidential information and must be protected;
- Training materials and programs.

Failure to main confidentiality could subject you or Security Walls to civil and/or criminal lawsuits or give both Security Walls and our customers' competitors an unfair advantage. A breach of duty to protect information will subject you to discipline, up to and including termination.

Respecting Property

We treat company and customer property as just that – company and customer owned, and thus worthy of respect. We protect and preserve both and refrain from using them for personal gain.

Use of Resources

Security Walls discourages *inappropriate* use of company and/or customer property. Employees are trusted to act responsibly, reasonably and maturely, and to use good judgment in the use of all company and customer-provided communications and computing devices, including but not limited to:

- The internet
- All forms of printed and electronic media
- Copying devices (scanners and copy machines)
- Telephones

- Cell phones
- Portable/wireless PDAs
- Desktop and laptop computers; and
- Remote access/dial-up hardware and software devices

Employees may not use the computer to transmit, store, or download materials that are threatening, maliciously false, or obscene. Facilities, equipment, technology and resources are the property of the Company for business use and to help you do your job. The Company reserves the right, at all times, to review and open all e-mails, listen to voice-mails, and otherwise inspect and review the contents of all computers and other electronic devices.

Property of customers, including but not limited to, computers, documents, information, furniture and other property, is to be respected at all times and not to be utilized in any fashion without the express *written* consent of the customer (either as permitted in the customer agreement or in a separate writing.)

Avoiding Conflict of Interest

While employed with Security Walls, our loyalty is to the Company. We refrain from any associations or activities that might conflict with the Company's interests. We also avoid doing business with competitors and accepting or giving excessive gifts to vendors or customers. We do not take advantage of our association with Security Walls for personal gain and avoid actions or relationships that might give even the appearance of a conflict of interest.

Activities and Relationships beyond Security Walls

It is important to ensure that our outside activities do not in any way conflict with or pose a hazard to Security Walls. Simple guidelines to follow when determining whether a conflict of interest exists are: First, avoid personal outside activities or associations that might influence your business decisions or your ability to do your job objectively. Also, avoid doing business with competitors or making significant personal financial investments in competitors, vendors, or customers. Similarly, your family members should not become involved in business ventures with your associates since you, as a Security Walls employee, could benefit from their gain.

If you are not sure whether an outside activity represents a conflict of interest, ask your supervisor for help.

Entertainment, Gifts and Gratuities

Some business entertaining – including meals, social events or training and educational activities – is an accepted business practice at Security Walls, but the cost and scope of these activities should be reasonable and appropriate. Before accepting or extending invitations for entertainment, you should first check with your company supervisor. It is your responsibility to make business decisions based on what is best for Security Walls.

Similarly, you should refrain from giving or accepting excessive gifts to or from customers, vendors, or other business associates. The value of gifts received or given

should not exceed the aggregate value of \$100 per year, unless you have received prior approval from your supervisor. Security Walls employees should never accept cash gifts from customers or vendors. Stay alert, use common sense, and don't put yourself, the Company, or your associates at risk.

Obeying the Law

We must always uphold the law while working at Security Walls. This includes, for example, obeying all state and local licensing regulations governing the Private Security trade and work as a Security Officer. Drug use, fraud, theft, embezzlement, price-fixing, bid-rigging, allocation of customers, and any other illicit activity are grounds for immediate termination and possible prosecution by public authorities.

Regulatory Obligations

As a provider of contract security services with public reporting responsibilities, Security Walls is heavily regulated by federal, state, and local agencies. In the conduct of our business, the Company must:

- Ensure it is properly licensed, bonded, and insured to operate as a Private Security Agency, Watch, or Guard Service;
- Ensure that its Security Officers are properly licensed, trained, equipped, and uniformed, and that all Security Walls employees neither use illicit drugs nor have disqualifying criminal histories;
- Conduct its sales and marketing activities ethically and within established laws, regulations and guidelines;
- Promote a work environment for employees that is safe, ethical, and founded on principles of equal employment and non-discrimination; and
- Ensure the accuracy of Security Walls's financial statements and follow other regulations that apply to organizations with public reporting requirements.

Security Walls is committed to the highest standards of regulatory compliance. As Security Walls employees, we all play an important role in operating the Company as responsible corporate citizens.

External Audits and Reviews

From time to time, Security Walls will have outside parties on site to perform financial and regulatory audits and reviews of our financial statements, operations, and business practices. These outside parties include independent auditors and federal and state government regulators and inspectors. It is Security Walls's policy to fully cooperate with these auditors and provide them with all necessary information. During these audits or inspections, you must never conceal, destroy, or alter any documents or give any false or misleading statements to inspectors. Also, you should never provide inaccurate information or obstruct, mislead, or delay communication of information or records about a possible violation of law. If you ever have any questions or concerns about our business practices, consult with Security Walls Chief Manager.

Illegal Activities

Security Walls and its employees must not engage, directly or indirectly, in any corrupt business practices or other illegal activities. Such activities include, but are not limited to, fraud, theft, embezzlement, falsification of records whether paper or electronic, kickback arrangements, and illegal drug possession, use or distribution. Fraud includes such things as falsifying timecards and expense reports.

A kickback arrangement involves accepting or offering bribes or payoffs intended to induce, influence, or reward favorable decisions of any person or entity, including customers, vendors, or government personnel, in a position to benefit Security Walls. Additionally, it is illegal to eavesdrop on, or to record, a telephone conversation of a customer or other third party.

Antitrust and Unfair Competition

Antitrust laws make sure competition between companies is fair. These laws also protect the public against business competitors who band together or "collude" to unfairly set prices. You could be breaking these laws if you do things as simple as discuss with competitors pricing, terms and conditions of contracts, proposals, or territories, or dealings with customers, vendors, or other competitors. Our competitors include other contract private security services companies, watch, and guard agencies. You should be particularly sensitive to antitrust rules if you participate in trade associations or other meetings where competitors are likely to be present.

Political Contributions

All employees must comply with applicable campaign finance and ethics laws. U.S. law and Company policy prohibit the use of Company funds, assets, services or facilities on behalf of a political party except under limited circumstances. Further, Security Walls is prohibited from compensating or reimbursing any employee, in any form, for any political contribution. The Security Walls Chief Manager must approve, in advance, of any political solicitation made during business hours or at Company facilities.

Security Walls's policy does not discourage or prohibit employees from voluntarily making political contributions, participating in the political process on personal time, or in expressing their personal views on legislative or political matters. Any involvement by you in civic affairs or political activities is a personal choice. If you speak out on public issues, you must make it clear that you are speaking only for yourself and not for the company.

Sales, Marketing and Advertising Standards

We are committed to growing the Company through exceptional customer service and a well-trained, highly professional sales staff. All Security Walls sales representatives are committed to fair, forthright and legally compliant sales and marketing practices. We must not engage in corrupt marketing practices while advertising our services and will present only truthful, non-deceptive information. When required, Security Walls will

submit materials to regulatory agencies to ensure that such materials are in full compliance with applicable regulations.

Copyright Law

We follow state and federal laws pertaining to copyright protection. This includes laws that prohibit duplication of print materials, licensed computer software and other copyright-protected works.

Recordkeeping and Preservation of Records

The law requires that the Company keep books, records and accounts that accurately and fairly reflect all transactions. Security Walls strictly adheres to regulations, accounting principles and rules, and other criteria designed to ensure full accountability and reliability in its financial statements. It is very important that you as an Security Walls employee accurately collect, record, and report Company information, including time and attendance records, test and training results, cost or pricing data, invoice amounts, purchase orders, accounts payable, and accounts receivable data.

Employees with responsibility for preparing and maintaining the Company's financial records must comply with Security Walls's internal accounting control policies, as well as with all laws and regulations governing record preservation.

Responsibilities and Consequences

Employee Responsibilities

Security Walls will provide you with the training and education opportunities you need to be knowledgeable about our ethics and compliance initiatives. In return, the Company relies on you to help ensure that those initiatives remain a priority. This involves upholding all of the standards outlined in these guidelines, as well as reporting any suspected violations of those standards.

If you observe potential violations of the law or the Company's Code of Ethics, you should not hesitate to report such issues. Failure to do so could pose a risk to Security Walls or, in the case of illegal activities or regulatory violations, a risk to you and co-workers. Further, a willful failure to report a violation of the law or the Company's Code of Ethics will subject you to discipline, up to and including dismissal.

Reporting Suspected Violations

If you have an ethics or compliance issue to report, talk to your supervisor.

Resolutions, Communication and Non-Retaliation

Once a problem or suspected violation has been reported, Security Walls pledges to quickly investigate and resolve the problem, and provide you ongoing communication. Security Walls will not retaliate against you or permit retaliation by any employee against you for having made a good faith complaint. Retaliation itself is a violation of this Code of Ethics, with severe consequences for any violation up to, and including, dismissal.

If you are uncomfortable reporting an ethics or compliance violation by name, you may do so anonymously through this email operator@securitywalls.net. We ask that should you choose this option, provide as much detail and facts as known regarding the potential violation to provide the Company with information that it can take action on.

Consequences of Violations

Security Walls commits to thoroughness and fairness when investigating possible ethics or compliance violations. Employees who are deemed to have committed violations will be subject to appropriate disciplinary action up to, and including, termination. Security Walls reserves the right to refer potential violations to regulatory and law enforcement authorities, if deemed appropriate under the circumstances.

Where to Find Answers to your Questions

Additional Ethics and Compliance Resources

The Company's Code of Ethics is meant to provide an overview of Security Walls's policies on ethics, compliance and conduct-related issues. This publication is a living document and is subject to change as we refine our policies and procedures and as government agencies and regulators modify their rules. Nothing in the Code of Ethics or these Guidelines constitutes a contract of employment.

If you need more information, or if you have an ethics or compliance-related question or concern, the best thing to do is talk to your supervisor or the Corp office. These are the best sources when you need help understanding the laws, regulations and practices that affect your work.

Employees are also encouraged to explore additional sections of this Employee Handbook for Hourly Staff. It covers various topics including employment basics, payroll practices, health and retirement benefits, and rules of conduct, the Company's Concern Resolution Process, and health and safety issues.

COMPENSATION AND BENEFITS

Due to client requirements, Company needs, economic conditions and costs imposed by third parties, compensation and benefit programs are subject to change at least annually and possibly more often. Nothing in this Handbook constitutes a continuing guarantee of any benefit or policy stated in the Handbook. The Company reserves the right to change, modify or eliminate compensation and benefit programs without notice. Specific questions on eligibility and participation in such programs should be addressed to the Corp office. In the event there are any inconsistencies between the Handbook and any policy or Plan Document, the policy or Plan Document will control all determinations.

Classification of Employees

Unless told otherwise, you will be paid on an hourly basis – a specified wage rate paid per hour worked in a given pay period – rather than a salary. As such, you will be eligible for possible overtime pay (generally one and a half times your hourly rate for hours worked over 40 in a pay week), subject to applicable law. Due to the nature of the Company's business – such as fill-ins for absent or vacationing officers, seasonal special coverage, short-notice startups and emergencies – you may be required to work overtime from time to time. Your agreement to do so is a material term and condition of your initial and continued employment. However, overtime work may not be available on an ongoing basis or as a regular part of your compensation. Overtime wages are paid according to state and federal statutes.

Eligibility for certain benefit programs may be dependent on your being classified as a full-time employee. You will be classified as full-time if you work at least an average of 32 hours a week as measured over a three-month period. Otherwise, you will be classified as "part-time."

Wages and Pay

Your hourly wage rate is largely determined by the specified rate set forth in the Company's contract with the Client at the account to which you are assigned. Other considerations may include your length of service with the Company, your length of service at a particular location, your experience and qualifications, your performance and any special requirements for your post.

You will be paid on a bi-weekly basis. Security Walls's work week begins at 12:01 a.m. Sunday and ends the following Saturday at midnight. You will be paid on the Wednesday ten days after the end of the pay period. Security Walls requires Direct Deposit to ensure your funds are deposited into an account electronically each payday.

Recording Hours Worked

Each hourly employee must record the time at the beginning and end of each shift worked. In addition, if an employee leaves the site for any reason other than Company business during the normal working hours, s/he must "clock out", then "clock in" upon return. The hours worked should be recorded daily, totaled at the end of each week, and given to the supervisor for verification. In no event may an employee's hours be recorded or altered by another employee other than the supervisor. Falsifying time records can be cause for termination of employment.

Deductions from Pay Checks

The Company is required by law to deduct certain amounts from your pay and to forward such amounts to the state and federal governments. These include withholding tax, social security tax (which is matched by the Company), state disability insurance (in states where such exists), and garnishments ordered by a court (if applicable). Payroll deductions are also made for union membership.

Deductions are shown on your pay stub. If you believe a deduction is incorrect, contact your Supervisor or Corp office for further assistance.

Holidays

Security Walls generally recognizes ten holidays, as follows:

- New Year's Day
- Martin Luther King, Jr. Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Black Friday (day after Thanksgiving Day)
- Christmas Eve Day
- Christmas Day
- New Year's Eve Day
- Your Birthday

Personnel working on a recognized holiday will be paid his/her hourly wage rate as well as up to eight hours of straight wages. Employees who do not work on designated holidays will be paid for up to eight hours straight wages.

Vacation

Security Walls recognizes the importance and necessity for employees to take time off from work with pay for purposes of leisure, recreation and relaxation. Regular full-time hourly employees will generally be eligible for the following paid vacation time based on their length of service. (If you are at a site with an anniversary plan, the following is generally true except that you can only use already-earned vacation.)

Vacation Tier Schedule	
Length of Service Tiers	Maximum available vacation
After One Year	80 hours of vacation
After Five Years	120 hours of vacation
After Ten Years	160 hours of vacation

On the day of the employees anniversary of original date of hire, the employee shall become eligible for the above listed vacation hours.

Leaves of Absence

Family and Medical Leave (FMLA)

In accordance with the Federal Family and Medical Leave Act, Security Walls will grant up to 12 weeks of family or medical leave to eligible employees within a 12-month period under the provisions of the FMLA of 1993.

Reasons for Leave:

In order to qualify as FMLA leave under this policy, the employee must be taking leave for one of the following reasons:

- The birth of a child and caring for that child;
- The adoption or foster care placement of a child and caring for that child;
- To care for a spouse, dependent child, or parent with a serious medical condition;
- or
- The serious medical condition of the employee.

Employee Status and Benefits During Leave:

While an employee is on leave, the Company will continue the employee's health benefits, including life and disability, at the same level and under the same conditions as if the employee had continued to work. The employee will continue to pay appropriate premiums. The Corporate Office can advise you on the manner of making such premium payments in the event that you are faced with this situation.

Procedure For Requesting FMLA Leave:

Ordinarily, the employee must provide notice 30 days in advance when the leave is foreseeable. In the event 30 days advance notice is not possible, the notice must be given as soon as possible within one or two business days of when the employee learns of the need for leave. Notice should be given to the employee's Supervisor or the Corporate Office, preferably in writing. Shortly after your request is received, your Supervisor should forward to you the appropriate Leave paperwork. If you have not received this information within two weeks of your request contact the Corporate Office.

Documentation Required:

Any request for medical leave under FMLA requires medical certification made by the health care provider of the eligible employee or of the child, spouse or parent of the eligible employee as applicable. Such certifications must be provided to the Company within 15 calendar days of receipt. The certification provided to the Company by the health care provider must be an original.

Certifications must contain:

- the date on which the condition began;
- the probable duration of the condition;
- the medical facts which the health care provider knows about the condition;
- where appropriate, a statement that the eligible employee:
 - is needed to care for the relative with a serious health condition; or
 - is unable to perform the functions of the job;
 - in the case of intermittent leave or reduced schedule leave, the dates and duration of the intended treatment.

The Company reserves the right, at its expense, to require a second opinion of any certification. While on leave, employees are to report periodically to the Company regarding the state of the medical condition and their intent to return to work. At a minimum, this should occur at the end of the time frame outlined by the health care provider or every thirty days, whichever is sooner.

Compensation While On Leave:

FMLA leave is unpaid. Employees may elect, however, to substitute accrued vacation pay to offset some or all of such leave.

Returning From Family Medical Leave:

Upon return from leave, an employee shall provide a certification from the health care provider that the employee is able to return to work when the reason for the leave was the employee's own serious medical condition. An employee returning timely from FMLA leave is generally entitled to be placed in the same or similar position to that held when the leave began. Except in special circumstances, employees who fail to timely return from FMLA leave must repay any health coverage premiums that were paid by the Company during the leave.

Funeral Leave

In the event of death of the immediate family, you will be granted three (3) days of emergency leave with pay. The three days of funeral leave will not include your regular days off. One of the three (3) days off must be the day of the funeral. Your immediate family is defined as the father, mother, father-in-law, mother-in-law, grandfather, grandmother, sister, brother, spouse, children and stepchildren of the Employee. A copy of the death certificate, obituary, or funeral program and proof of relationship must be provided to the Employer upon the Employee's return from funeral leave.

Military Leave

Employees, who are obligated to serve in the U.S. Military, whether on active duty, reserve duty or National Guard, will be provided all time off necessary to perform this vital function. You may use any accumulated vacation time if you wish to be paid during your absence. Please submit copies of your orders or other similar documentation to your Supervisor as soon as you learn of your military obligation so that management can schedule around your absence. If your leave requirement is longer than two-week annual reserve training, you will be advised by the Corporate Office on the effect of your leave on any benefit programs you may be participating in and your future employment rights with the Company upon your return from duty.

Jury Duty

If you are called to jury duty, your absence from work will be excused. Submit a copy of the summons to appear for jury duty to your Supervisor. In the event that you are scheduled to work at the same time that you are called for jury duty, the Company will make up the difference between jury duty compensation and the wages that you would have received if you had worked your regular schedule. In order to obtain this compensation, you must present proper proof of the dates and times of the jury duty as well as the amount of payment received from the court. Security Walls will not pay you for time on jury duty when you would not have otherwise been scheduled to work.

Attendance at a court or judicial proceeding in connection with your job duties at Security Walls is an official duty. When appearing in Court, suitable attire is required, and you will be directed to assist Company attorneys in preparing for your appearance where appropriate.

IMPORTANT TELEPHONE NUMBERS

Your Post Orders at your assigned site will provide you with telephone numbers for local police, fire and ambulance services. Please locate those numbers, be familiar with them and have them within your immediate reach in case of emergency. You should also take the opportunity to write down the telephone numbers for your Supervisor and the Corporate Office and carry them with you at all times.

Additionally, you may find yourself needing to use the following telephone numbers while working at Security Walls:

Corporate Office:

Main: (865) 546-2597

Toll Free: (877) 546-2597

RECEIPT OF EMPLOYEE HANDBOOK (including Code of Ethics)

I have received a copy of the Employee Handbook for hourly personnel. As a condition of employment I agree to abide by the rules and regulations contained therein. I understand that the rules, policies, and benefits contained in the Employee Handbook may be updated, modified, or deleted at any time and that it is my responsibility to keep myself apprised of any changes.

In consideration of my employment, I agree to conform to the rules and regulations of Security Walls Security Services. I understand that my employment and compensation can be terminated, with or without cause, and without notice at any time at the option of the Company or myself. I also understand that neither this Handbook nor any other communication by a management representative is intended to, in any way, create a contract of employment or to limit the Company's discretion to discipline or terminate my employment.

I also acknowledge that:

- I understand Security Walls's commitment to compliance with all laws, regulations, and guidelines.
- I am expected to read and understand the Code of Ethics and Business Conduct included in this Handbook and comply with those and all Company policies and procedures.
- I have the opportunity to ask questions about the Company's compliance policies and procedures.
- I understand that strict compliance with the policies and requirements of the Security Walls Code of Ethics and Business Conduct Guidelines are conditions of my continued employment, except as otherwise required by law.
- I understand that I have an obligation to report any potential violation of the Code of Ethics and Business Conduct Guidelines, by anyone, regardless of their position.
- I understand that disciplinary action, up to and including termination, will result if I violate these policies and requirements.
- I understand that, as a supervisor or manager (if applicable), I may be disciplined for
 - Failure to adequately instruct subordinates regarding the compliance program;
 - Failure to detect noncompliance with applicable policies and legal requirements where reasonable due diligence on my part as a supervisor/manager would have led to discovery of any problem or violation.

Signature: _____

Date: _____

Name (print): _____

Original copy: Personnel file