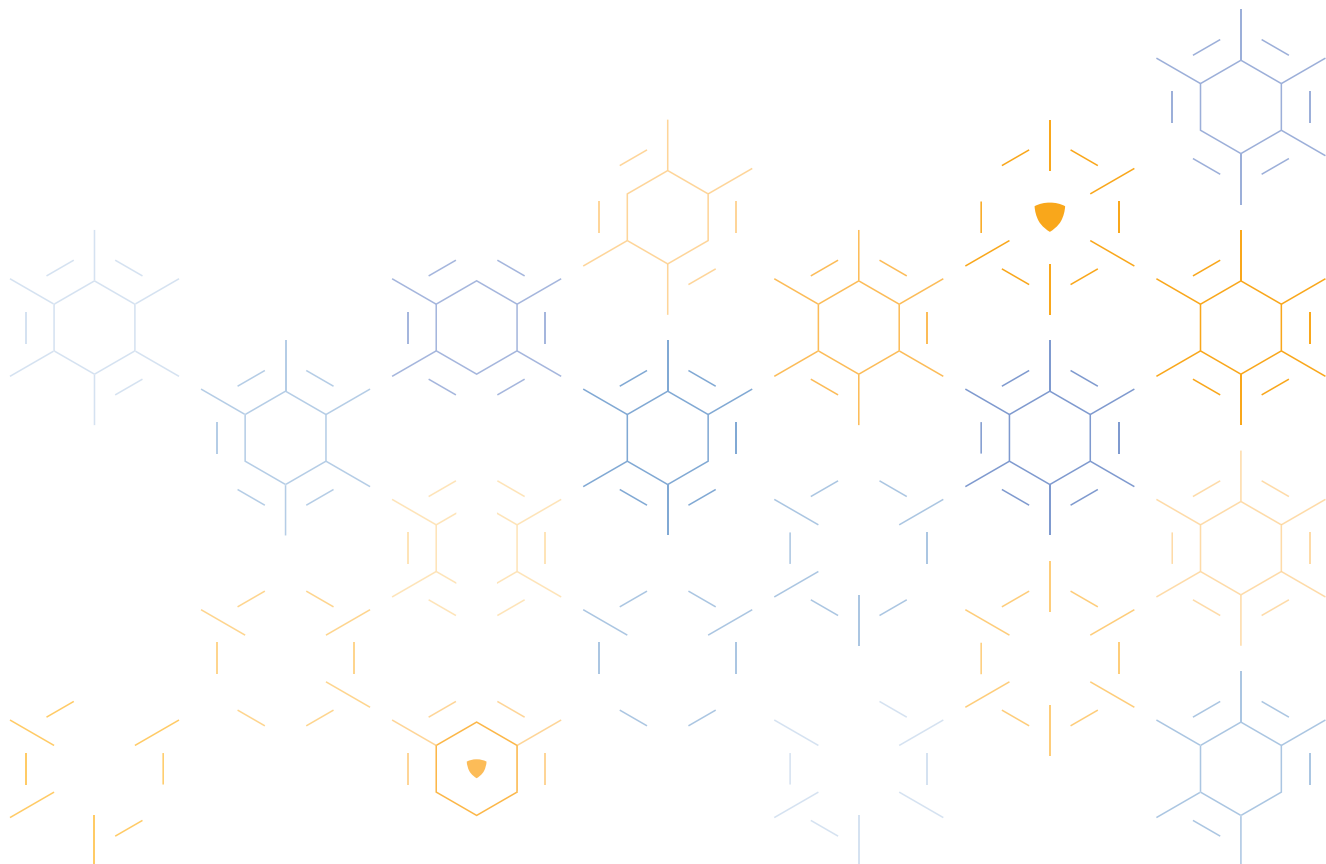




# SECURITY OFFICER

---

## HANDBOOK



THIS PAGE IS  
INTENTIONALLY  
LEFT BLANK

---



# PROPRIETARY INFORMATION

This handbook and its contents are the property of Paragon Systems, Inc. and must be returned upon termination of employment. The material contained herein represents proprietary information that is not to be made available to persons outside the Company.

## EMPLOYMENT-AT-WILL STATEMENT POLICY DISCLAIMER

The employment relationship that exists between you and Paragon Systems, Inc. (the Company or Paragon) is employment-at-will. You are free to end your employment with Paragon at any time, for any reason, with or without prior notice. Likewise, Paragon may, at any time, end your employment, with or without cause or prior notice. These policies, procedures, and guidelines, and any other written or verbal communication by a supervisor or manager do not constitute a contract or promise of employment of any kind by the Company. No person in the Company can alter the employment-at-will relationship except the CEO or President of the Company, who can do so solely in a written agreement with the Employee. Paragon reserves the right to terminate employment, or to alter the terms of your employment, including changing your wages, assignments or shifts, as business necessitates, and may alter any other terms or conditions of employment, with or without cause, with or without notice, with the exception of its policy of at-will employment. To have the necessary flexibility in the administration of policies, practices, and procedures, we reserve the right to delete, add to or otherwise modify policies, practices or procedures.

PARAGON HAS RECOGNIZED SPECIFIC UNION ORGANIZATIONS AS THE SOLE AND EXCLUSIVE BARGAINING REPRESENTATIVE FOR CERTAIN GROUPS OF EMPLOYEES. COLLECTIVE BARGAINING AGREEMENTS (CBA) OR WAGE DETERMINATION AGREEMENTS EXIST WHICH MAY, IN SOME RESPECTS, CONFLICT WITH THIS HANDBOOK. THE CBA OR WAGE DETERMINATION AGREEMENTS SHALL BE THE CONTROLLING DOCUMENT WHEN CONFLICTING LANGUAGE OR PROCEDURES ARE IDENTIFIED. COMPANY POLICY HAS ALWAYS BEEN THAT NONREPRESENTED EMPLOYEES ARE AFFORDED THE SAME BENEFITS AS THOSE EMPLOYEES WORKING AT A REPRESENTED SITE UNDER THE SAME SERVICE AGREEMENT. IN THE EVENT THAT ANY OF THE PROVISIONS OF THIS HANDBOOK ARE, OR BECOME, INVALID OR UNENFORCEABLE, BY REASON OF THE COLLECTIVE BARGAINING AGREEMENTS, FEDERAL OR STATE LAW, REGULATION OR COURT DECISION, THE REMAINING UNAFFECTED PROVISIONS SHALL REMAIN IN FULL FORCE AND EFFECT.

*All references to "Paragon" used in this book mean "Paragon, Systems, Inc." The contents of this book are applicable to all security officers and field security personnel. Some sections pertaining to wage/hour issues may not be applicable for exempt employees.*

THIS PAGE IS  
INTENTIONALLY  
LEFT BLANK

---



# SEE SOMETHING; SAY SOMETHING

## *If You See Anything Unusual, Report It*

Security officers sometimes prevent crimes and violent, negative events through vigilance and good reporting. The best way to deal with terrorism, workplace violence and criminal acts is to prevent them from happening.

DO NOT IGNORE SIGNS OR “RED FLAGS” THAT COULD INDICATE POSSIBLE DANGER. USE YOUR COMMON SENSE: REPORT UNUSUAL, OUT OF THE ORDINARY AND SUSPICIOUS THINGS AND ACTIVITIES.

# WELCOME ABOARD

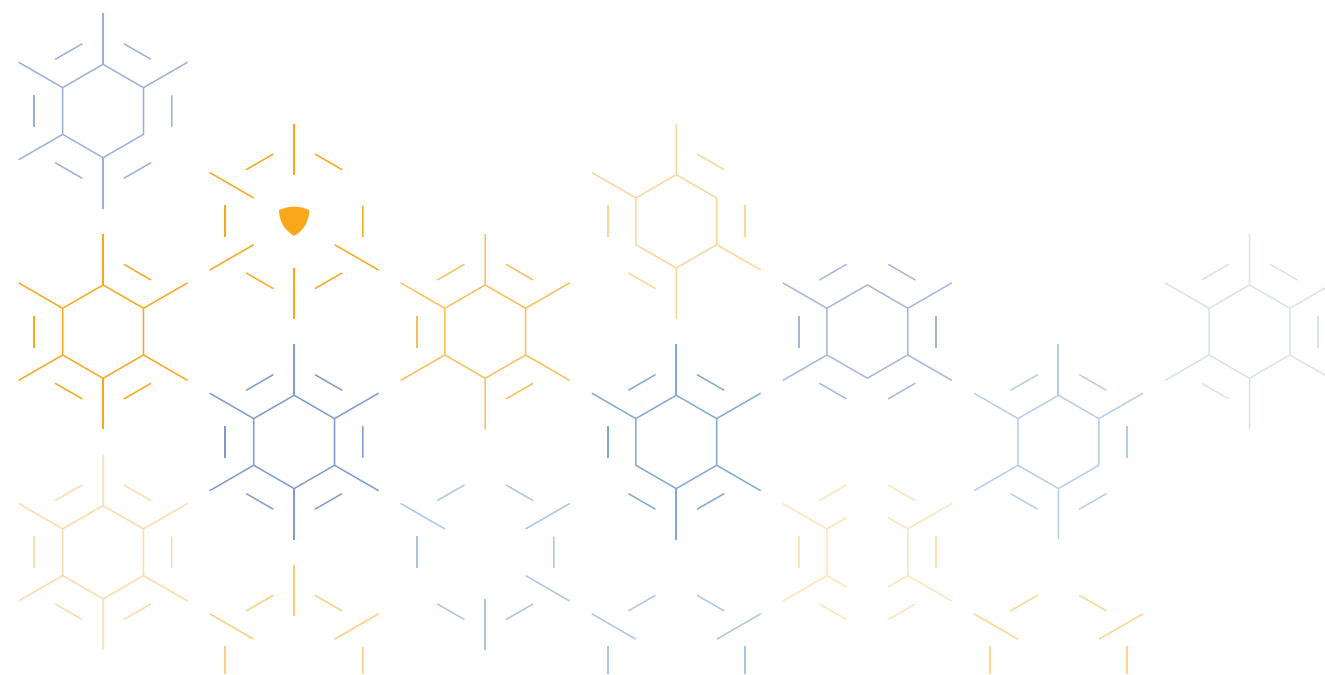
Welcome to Paragon Systems!

We are excited to have you join the team. Paragon is a special company, dedicated to safeguarding American assets at home, abroad, & beyond. You were hired because we believe that you will make a meaningful contribution to the achievement of our mission; to our success; and that you share our commitment and goals.

As a part of our team, we hope that you will discover that the pursuit of professional excellence and an uncompromising demand for integrity and achievement of mission will result in a rewarding and long-term career. It is our expectation that you will share in the ownership of our reputation and pride of our organization's dedication to serving the Federal Government and its contractors.

At Paragon, we believe that each member of our team is essential to the organization's success. We seek to create an atmosphere within the company that will allow all employees to feel a sense of accomplishment and contribution. We pledge that our management will be fair in all employment decisions and that we will continually strive to improve our organization and the standards of living for each employee. We believe that both the company and its employees should be good citizens. We encourage you to contribute and participate in civic initiatives throughout the communities where we work and live.

Together, we are Paragon. Whether you are joining us straight out of school, the armed forces, as a second profession, or somewhere in between, there is a career filled with opportunities for you at Paragon across the national security landscape. Our flexible career paths and training programs provide a wealth of trajectories for your future. I hope that you will share our enthusiasm about Paragon and its growth and progress. We look forward to the future we will build together!



## ABOUT THIS MANUAL

This manual has been prepared to provide you general information about some of the work rules and policies under which we operate and assist you in the performance of your assigned duties. It contains information and suggestions to help you do a better job. The manual will provide you with general information in accepted techniques and will serve as a supplement to the established post orders. You will be expected to keep this manual available for ready reference. You should follow diligently the rules and regulations listed in this manual in order to provide the best service possible to our clients.

More extensive information is available from your supervisor, Program Management Team and the Paragon human resources staff should you have questions concerning specific sections of the manual. From time to time, you may receive updated information concerning changes in policy.

Paragon believes in promoting an atmosphere of open communication and cooperation among our personnel. This Manual reflects that philosophy. It supersedes in all respects any prior handbooks, policy manuals, benefits or practices of the company and has been prepared to provide you with general information about benefits and outline some of the policies and procedures under which we operate. The manual is by no means all-inclusive and is not intended to encompass all rules, practices, regulations, and policies of the company. Its provisions should be considered as no more than general summaries and guidance of the policies and practices they address.

While we hope that our personnel actions will continue to be positive, from time to time Paragon may unilaterally, at its discretion, amend, modify or eliminate one or more of the benefits, work rules or policies described in this manual, or any other employment benefits, with or without prior notice.

This manual does not constitute a guarantee that your employment will continue for any specified time or end only under certain conditions. Nothing in this manual constitutes an express or implied contract of employment or warranty of any benefits. Employment with Paragon Systems is voluntary employment, at-will for no definite period of time. This means that you or Paragon may terminate the employment relationship at any time, with or without notice or cause. While we hope to have a long and mutually beneficial employment relationship, regardless of anything which may appear in this Manual or any other Paragon publication, policy, statement or practice, you have the right to terminate your employment with Paragon for any reason with or without cause or notice at any time, and Paragon reserves the right to do the same. No one has authority to bind Paragon to any agreement contrary to the foregoing except our CEO and/or President, in writing.



THIS PAGE IS  
INTENTIONALLY  
LEFT BLANK

---





# TABLE OF CONTENTS

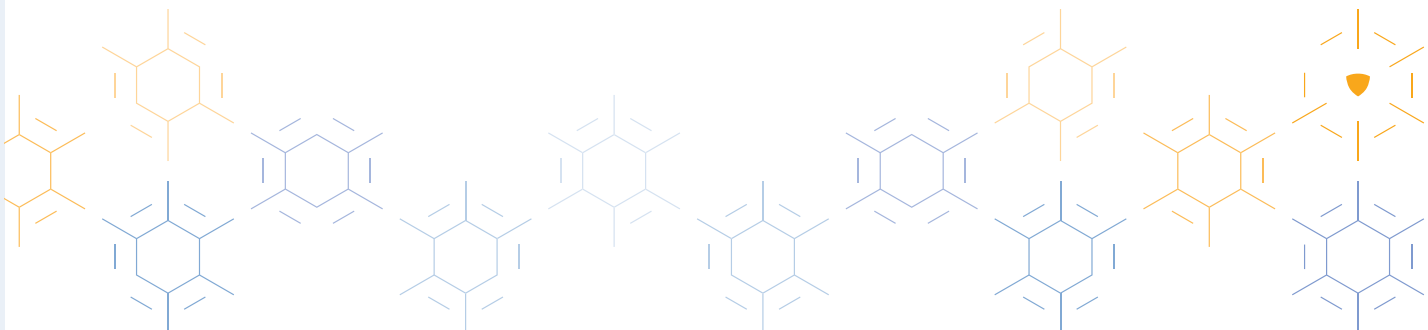
Our Company .....	1
About Paragon Systems, Inc.....	1
Contacts & Correspondence .....	1
About Our Team .....	2
Our Mission .....	2
Paragon Protective Service Offerings .....	2
Paragon Cyber .....	3
Paragon Energy.....	3
Paragon Inspections .....	3
Paragon Investigations .....	3
Paragon Mission Support .....	3
Paragon Protective Services .....	3
Paragon Risk Management .....	3
SCIS and Aerospace Defense .....	3
Productive Work EnvironmenT .....	4
EEO & Affirmative Action Statement .....	4
Non-Discrimination on the Basis of Disabilities and Reasonable Accommodations .....	4
Diversity Policy .....	5
Policy Against Discrimination and Harassment.....	5
Gender Identity and Transition .....	7
Chain of Command .....	7
Policy Against Retaliation.....	8
Pay Transparency Policy Statement .....	8
Paragon Hotline .....	8
Drug-Free Workplace.....	9
Preventing Violence in the Workplace .....	10
Reporting Unsafe Conditions and Security Risks .....	10
Professional Development.....	11
Training Programs.....	11
Recognition Programs.....	12
Standards of Conduct.....	12
Business Ethics.....	13
Compliance Guidelines .....	13
Competition .....	13
Political Activity & Contributions .....	13
Attendance Standards .....	14
Non-Solicitation Policy .....	15
Safety Policy .....	15

# TABLE OF CONTENTS

Company Commitment to a Safe and Healthy Workplace .....	15
Employees Should Report all Safety Concerns.....	16
Reporting Unsafe or Unhealthy Working Conditions .....	16
Uniforms & Appearance .....	17
Post Orders .....	19
Company Issued Tools & Equipment .....	19
Company & Client Communications Equipment .....	19
Use of Computer Software.....	20
Acceptable Usage and Electronic Communications .....	20
Appropriate Usage.....	20
Prohibited Usage .....	20
Communications .....	21
Harmful Employment Communications .....	22
Social Networking .....	23
Employee Arrests & Convictions .....	24
Confidential Information .....	24
Conflict of Interest .....	25
Outside Employment.....	25
Employment of Relatives & Workplace Relationships .....	25
Release of Company Information / Media Inquiries .....	26
Employment Verification.....	26
Safeguarding of Personal Information .....	26
Smoking .....	26
Possession of Firearms & Weapons .....	27
Limits of Authority & Use of Force and Special Security Devices .....	27
Vehicles.....	28
Your Employment .....	29
Employment “At-Will” Statement.....	29
Employment Classification & Status .....	29
Terms & Conditions of Employment.....	30
Mandatory Arbitration .....	30
Transfers & Promotions .....	31
Hours of Work .....	31
Overtime.....	31
Pay Periods.....	31
Lactation Accommodation .....	31
Timekeeping.....	32
Salary Wages.....	32

# TABLE OF CONTENTS

Personal Status Change .....	32
Leaves of Absence .....	32
Benefits.....	35
Health Insurance .....	35
Employee-Paid Voluntary Benefits.....	35
Medical / Dental / Other Insurance Client Site Specific .....	35
Premium Contributions - Employee Responsibility .....	35
401 (K) Plan .....	36
Employee Assistance Program (EAP).....	36
Payroll Management .....	36
Worker's Compensation.....	36
Holidays .....	37
Vacation / Paid Time Off (PTO).....	37
Sick Days .....	37
Rules for Personal Conduct.....	37
Discipline & Termination .....	40
Voluntary Separation.....	40
Involuntary Separation / Layoff .....	40
Other Employer Initiated Separations .....	40
Progressive Discipline Policy.....	40
Causes for Immediate Suspension .....	41
Procedure.....	41
Step 1: Oral Reprimand.....	41
Step 2: Written Reprimand .....	42
Step 3: Unpaid Suspension .....	42
Step 4: Termination.....	42
Appeals Procedure.....	42
Outcome.....	42
Final Wages .....	42
Group Health Benefits & COBRA.....	42
Notes: .....	43



THIS PAGE IS  
INTENTIONALLY  
LEFT BLANK

---



# OUR COMPANY

## *About Paragon Systems, Inc.*

Since its inception in 1983, Paragon Systems has been dedicated to providing high quality services with one mission in mind: safeguarding American assets. It is through Paragon's commitment to this mission that the company has become one of today's most dependable security services provider in the country.

The Paragon team has grown its security services to include uniformed and armed security officers, federal investigators and inspection officials, cybersecurity experts, and other professionals essential to supporting the Federal Government's mission. Our officers are responsible for access control, law enforcement, personnel protection, theft prevention, surveillance, vehicular and foot patrol, crowd control and the prevention of sabotage, counterterrorism, and crime deterrence. Extensive training, industry expertise and passionate dedication to excellence mark the cornerstones of Paragon's history.

Today, our officers support vital homeland security programs and protect some of the nation's most sensitive infrastructure. Paragon's clients include the Department of Homeland Security, NASA, the Department of the Treasury, the Federal Bureau of Investigation, the Drug Enforcement Administration, the Federal Emergency Management Administration, the Social Security Administration, and the National Park Service.

Paragon is based in the Washington D.C. area and a subsidiary to Securitas Critical Infrastructure Services, Inc. (SCIS). The relationship to the global security leader, Securitas AB, affords Paragon the ability to leverage the buying power, bench strength and economies of scale of an \$11 Billion Dollar parent company. SCIS and Paragon are guided by a distinguished group of Americans who form our proxy Board of Directors.

In 2020, the Investigations and Energy sectors of SCIS consolidated under the venerable Paragon brand to provide broader service capabilities and best represent our commitment to safeguarding American assets and home and abroad.

## *Contacts & Correspondence*

Correspondence to corporate headquarters should be directed to the following address:

**Paragon Systems, Inc. / Parasys, Inc.**  
**13900 Lincoln Park Drive, Suite 300;**  
**Herndon, VA 20171**

You can reach the corporate office from 9:00 am to 4:00 pm eastern time at 703/263-7176. Our fax number is 703/263-9527. Our web site is [www.parasys.com](http://www.parasys.com).



## ***About Our Team***

Paragon Systems is a diverse organization built upon teamwork and a collective commitment to quality, service, and integrity. Our employees bring to Paragon many different perspectives, experiences, and educational backgrounds. Much like our nation, we believe that our diversity has made our Company stronger and more competitive.

We take great pride in the many awards Paragon has won for excellence and dedication to service. We are a government approved vendor in all 50 states, Guam and the Virgin Islands. We are qualified to provide guard services and professional security services through the Federal Supply Schedule to all agencies of the federal government. Paragon is certified by the Virginia Department of Criminal Justice Services and dozens other state licensure boards. We hold facility clearances that permit us to perform classified work and provide cleared personnel.

Paragon's long history of accomplishment has been made possible by the commitment of Paragon's employees and their dedication to a common goal. Together, we believe the accomplishments are limitless.

## ***Our Mission***

Paragon's mission is to safeguard American assets at home and abroad. Paragon Protective Services achieves this mission through the physical protection and security of federal facilities, assets and personnel. We recognize our responsibility to maintain the highest standards of quality services through the employment, training and retention of security careerists who are committed to Paragon's Mission. We strive to provide an environment conducive to our officers' personal and professional growth and a mission critical dedication to the day-to-day conduct of our business.

At Paragon, we define ourselves by the partnerships that we have built with our clients. We recognize the trust that our clients place in us, and that the success of our business is dependent upon, and measured by, the success of our government clients' missions. We are committed to integrity, vigilance and compliance.

## ***Paragon Protective Service Offerings***

Paragon security officers, government buildings occupied by thousands of federal employees, research facilities that store chemical and biological agents, National Heritage sites, NARA, border crossings, highly sensitive site, Federal law enforcement sites, government computer centers and military installations. Among the comprehensive range of security support services that we offer, Paragon security specialists and officers perform armed and unarmed post/gate control, magnetometer screening, roving foot and vehicle patrols, management of central communications/security centers, CCTV and alarm monitoring, security escort, dignitary protection, security training, threat assessment, emergency preparedness evaluation, vehicle and visitor screening/badging, armory management, and first responder emergency services.

## ***Our Expertise***

With over 14,000 professionals, Paragon and SCIS are the leading provider of specialized security, fire, investigations, inspections, cybersecurity, risk management, and mission support services to the U.S. Federal Government and other critical infrastructure clients. Following is a brief summary of our service lines:

### **Paragon Cyber**

Our newest business sector, Paragon Cybersecurity focuses on supporting staffing, analytical and the technology needs related to the security of the Federal government's cybersecurity infrastructure.

### **Paragon Energy**

Paragon Energy provides specialized armed protective services for owners and operators of nuclear power, fuel storage, and energy facilities.

### **Paragon Inspections**

Paragon Inspections supports a variety of inspection needs to the Federal and State agencies across the country.

### **Paragon Investigations**

Paragon Investigations collects and reports information for the vetting of Federal civilian, military, and contractor personnel.

### **Paragon Mission Support**

Paragon Mission Support is responsible for sourcing, assessing, hiring, training, and managing staffing needs to effectively execute the mission of Federal agencies.

### **Paragon Protective Services**

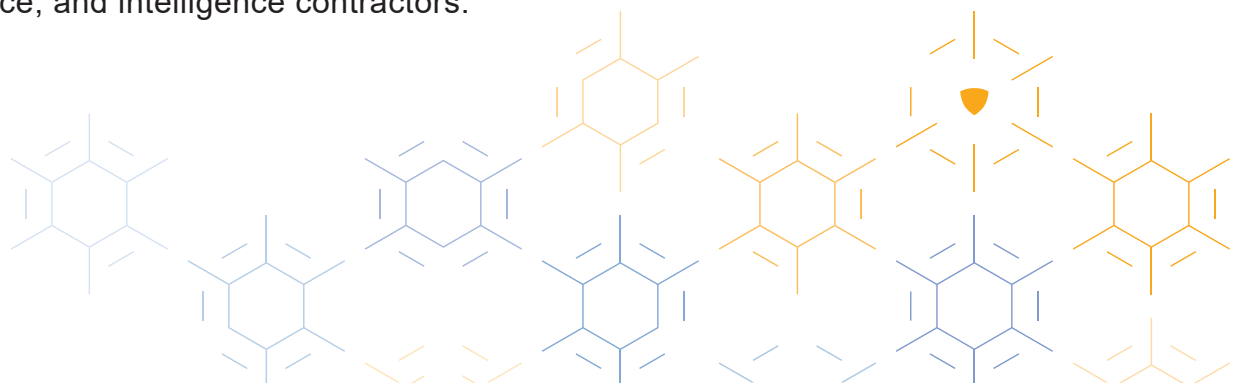
The leader in Federal physical security services since 1983, Paragon Protective Services provides uniformed and armed security officers.

### **Paragon Risk Management**

Providing a combination of analytics, innovative technology and unparalleled experience, Paragon Risk Management is focused on identifying, managing, and mitigating the business risks of our clients.

### **SCIS and Aerospace Defense**

SCIS provides cleared protective services to classified facilities for many of the top Department of Defense, aerospace, and intelligence contractors.



# PRODUCTIVE WORK ENVIRONMENT

## *EEO & Affirmative Action Statement*

Paragon is an equal employment opportunity employer. We recruit, hire, train and promote persons in all job titles without regard to race/ethnicity, color, national origin, ancestry, sex/gender, gender identity/expression, sexual orientation, marital/parental status, pregnancy/childbirth or related conditions, religion, creed, citizenship status, age, disability, genetic information, veteran status or any other status protected by local, state or federal law.

Paragon ensures that all personnel actions such as hiring, compensation, benefits, Company-sponsored training, education, transfer, discipline, demotion, assignment, termination, layoff, and social and recreational programs will be administered without regard to protected group status. Additionally, Paragon has in place an Affirmative Action Program that sets forth the specific affirmative action and equal employment opportunity responsibilities of managers, supervisors and all Paragon employees. You may obtain a copy of the Affirmative Action Program by contacting your branch office or a Human Resources representative.

As a federal government contractor and/or subcontractor, Paragon is responsible for making good faith efforts to bring the percentages of females and minorities in our Company up to the levels of availability in the relevant labor markets. We are committed to these goals. The mandate for affirmative action can be found in: Title VII of the Civil Rights Act of 1964 which prohibits employment discrimination on the basis of race, color, religion, sex, or national origin. Additional federal laws prohibit discrimination based on citizenship, disability, or age, and require equal pay for equal work regardless of sex.

Fair employment obligations are specified in government contracts. A series of Executive Orders require government contractors to maintain written plans providing for affirmative action in the employment and advancement of minorities and females. Contractors are also obligated to have plans and make special provisions for Vietnam-era veterans, special disabled veterans and the disabled.

All employees are required to follow the Paragon equal employment opportunity and affirmative action objectives stated above. You are asked to report any incident that you think may be a violation of this policy.

## *Non-Discrimination on the Basis of Disabilities and Reasonable Accommodations*

In support of our nation's commitment to equal employment opportunity and in accordance with the provisions of the Americans with Disabilities Act (ADA) and other applicable federal and state laws, no program or activity administered by Paragon shall exclude from participation, deny benefits to or subject to discrimination any individual solely by reason of his or her disability. Equal employment opportunity will be extended to qualified disabled persons in all aspects of the employer-employee relationship, including recruitment, hiring, upgrading, training, promotion, transfer, assignment, discipline, layoff, recall and termination. Paragon will make reasonable accommodations for the known disability of an otherwise qualified individual unless undue hardship on the operation of the business occurs. Employees who may require a reasonable accommodation should contact their local Human Resources representative.



## ***Diversity Policy***

The Company is committed to maintaining a work environment that represents a culture of diversity and acceptance, as employees' differences are respected and valued. We embrace our employees' differences and characteristics that make each employee unique. We believe that these differences contribute to our overall achievements as a Company. All employees of Paragon have a responsibility to treat others with courtesy and respect at all times.

## ***Policy Against Discrimination and Harassment***

Paragon is committed to providing a professional and productive work environment, based on a culture and atmosphere of mutual respect, and free from unlawful discrimination and harassment.

Paragon does not tolerate unwelcome verbal or physical conduct, advances of a sexual nature, or any discrimination or harassment based on gender (including gender identity/expression), sex, sexual orientation ("A person's actual or perceived sexual and emotional attraction, or lack thereof, to another person."), pregnancy, childbirth or related medical conditions, race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, genetic information, citizenship status, marital status, military or veteran status, age, or other protected characteristic which violates local, state and/or federal law. Any individual who commits such a violation may be subject to discipline and possible termination of employment.

Sexual harassment is a serious form of employee misconduct which will not be tolerated by the Company. Additionally, in some cities, states or local geographies, sexual harassment is illegal. This includes Chicago, Illinois. Any employee found engaging in sexually harassing conduct will be subject to serious disciplinary action up to and including termination of employment. Sexual harassment in the workplace and retaliation for filing or assisting in the investigation of a complaint of sexual harassment is unlawful under federal, state, and most local laws.

Each supervisor or manager strives to keep the workplace free of harassment. No supervisor or manager may threaten or insinuate that refusal or willingness to submit to sexual advances will affect an employee's employment. Supervisors are required to immediately forward reports of harassment to Human Resources or Company management.

All harassing, discriminatory, or offensive conduct in the workplace is prohibited, whether committed by a Paragon employee, member of the public or client employee or agent. Examples of prohibited conduct include, but are not limited to:

- Unwanted physical contact or conduct, sexual flirtations, touching, kissing, brushing up against someone's person, advances, propositions, or assault.
- Verbal harassment based on any protected characteristic, lewd comments, sexual jokes, or offensive/suggestive sexual references.
- Demeaning, insulting, intimidating comments, objects, messages, pictures, or photographs.
- Inappropriate comments about an individual's personal appearance.
- Creating or forwarding demeaning, insulting, intimidating or sexually suggestive written,

recorded, or electronically transmitted messages, including screensavers, texts, emails, websites, blogs, etc.

- Inappropriate remarks about co-workers on social network sites, such as Facebook, or other similar types of social media.
- Request for sexual favours or other verbal or physical actions where:
  - » Submission to or rejection of such conduct is made implicitly or explicitly a term or condition of employment or is used or threatened to be used as the basis for employment decisions; or
  - » Submission to or rejection of such conduct by an individual is used as the basis for any employment decision affecting the individual
  - » Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creates an intimidating, hostile or offensive working environment.
- Sexual misconduct, which means any behavior of a sexual nature which also involves coercion, abuse of authority, or misuse of an individual's employment position."

This policy applies to Company supervisors and managers as well as employees. Each supervisor is responsible for maintaining a harassment and discrimination-free environment. Supervisors are strictly prohibited from implying or stating that submitting or refusing to submit to sexual advances will have any effect on the individual's hiring, placement, compensation, training, promotion, or any other term or condition of employment. No Company manager or supervisor has any authority or power over you to require you to submit to unwelcome sexual advances or unwelcome sexual conduct or tolerate a hostile work environment. If any manager or supervisor should ever make such an attempt, you should report it immediately as outlined below, and the Company will see that: (1) The conduct stops, (2) The manager or supervisor is dealt with appropriately, and (3) There is no retaliation against you.

The Company prohibits retaliation against any employee for making a complaint of discrimination, harassment, or retaliation in good faith. Any person taking retaliatory action against an employee for filing a complaint shall be subject to immediate dismissal. In certain geographies, retaliation for reporting sexual harassment is illegal. This includes but is not limited to Chicago, Illinois. Any employee who believes that he or she has been subject to discrimination, harassment, or retaliation should promptly report the situation to a Human Resources representative, their supervisor, management, or the Paragon Hotline. The Company will undertake a fair, complete, and timely investigation by qualified and impartial personnel. The investigation will be documented and tracked to ensure reasonable progress and timely closure and will be kept confidential to the extent reasonably possible, consistent with the need to conduct an adequate investigation, and in accordance with applicable law. Corrective, remedial action, up to and including termination of employment, will be taken if misconduct is found.

All complaints or reports of discrimination, retaliation, or harassment will be promptly and thoroughly investigated, and the Company will take appropriate action, including remedial and disciplinary action if necessary, based on the results of the investigation. Complaints will be kept as confidential as possible, subject to the Company's need to investigate fully and take appropriate corrective action. All employees are expected and encouraged to participate fully and freely in any such investigation, and there will be no retaliation against any employee for truthfully participating in such an investigation.

You have a responsibility to report the situation to a human resources representative, your immediate supervisor, your management team or the Paragon Hotline (1-800-574-8637), or [www.Paragonhotline.com](http://www.Paragonhotline.com) as soon as possible.

Employees may also report complaints of discrimination, harassment or retaliation to the Equal Employment Opportunity Commission ([www.eeoc.gov](http://www.eeoc.gov)) or state fair employment agency (e.g., the California Department of Fair Employment and Housing, [www.dfeh.ca.gov](http://www.dfeh.ca.gov).)

**Massachusetts:** Commission against Discrimination (MCAD) – 617.994.6000

**Vermont:** Vermont Human Rights Commission – 800.4162010 / 802.828.2480  
or the Office of the Attorney General – 802.828.3171

**Rhode Island:** Rhode Island Commission for Human Rights – 4021.222.2661

**Connecticut:** Commission on Human Rights and Opportunities - 1-888-999-5545

## *Gender Identity and Transition*

Paragon seeks to ensure that employees who change their gender identity are treated in an equal and inclusive manner. Transgender employees shall not be subject to unwanted questions regarding their status, medical history, or sexual orientation. Also, any rude or inappropriate behavior towards transgender individuals, including the repeated or deliberate use of improper pronouns, is prohibited.

All employees are to comply with the appearance policy for their gender identity/gender expression and it is expected that employees will use the restroom and similar facilities appropriate to and reflective of their full-time gender identity. We ask that all employees maintain an environment of understanding and respect at all times.

If you believe any client personnel, tenant agency personnel & visitors actions or words constitute unwelcome harassment or disrespect of any kind you have a responsibility to report the situation to a Human Resources representative, your immediate supervisor, your local office management, or the Paragon Hotline (**1-800-574-8637 or [www.paragonhotline.com](http://www.paragonhotline.com)**) as soon as possible

## *Chain of Command*

Effective communication is essential to providing service to our clients, maintaining productivity, sustaining morale, and fostering cooperation among our team members. Communication is an ongoing process, and the company invites suggestions on how to enhance communications.

Employees are encouraged to share their concerns, seek information, provide input, and resolve problems through their immediate supervisor. It is the responsibility of each supervisor to take each employee's concern seriously and seek resolution of his or her complaints.

If an employee does not get resolution to their concerns through their immediate supervisor, they should escalate it through the local management chain and then to the corporate office.

## ***Policy Against Retaliation***

All employees shall be free from coercion, intimidation, retaliation, interference, or discrimination for filing a complaint of sexual harassment or assisting in the investigation of such complaint.

Paragon prohibits retaliation against any person who, in good faith, reports a complaint, testifies, assists, or participates in any investigation or proceeding conducted by Paragon or a government enforcement agency.

Any person taking retaliatory action against an employee for filing a complaint shall be subject to immediate dismissal. In certain geographies, retaliation for reporting sexual harassment is illegal. This includes but is not limited to Chicago, Illinois.

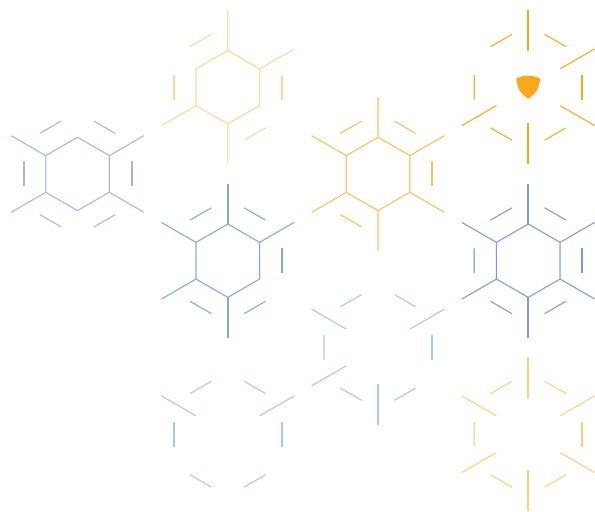
## ***Pay Transparency Policy Statement***

Paragon will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with Paragon's legal duty to furnish information.

## ***Paragon Hotline***

All employees have access to the Paragon Hotline confidential reporting system. Paragon Hotline permits you to advise Paragon in a simple and confidential manner of any situation that may adversely impact Paragon, its clients or its employees. The following are examples of situations which should prompt a timely report to Paragon Hotline:

- Theft or fraud
- Concerns about possible violence in the workplace
- Use of drugs or alcohol on the job
- Any form of harassment, discrimination, retaliation, or threats of violence
- Insider threat
- Mismanagement of Company resources
- Violation of safety or security policies
- Misappropriation of Company or client property / funds
- Violation of any Company policy, practice, or procedure
- Ethical violations
- Wage and hour violation



- Worker's compensation fraud
- Benefits concerns or pay issues
- Conflict of interest
- Violation of Federal Acquisition Regulations (FAR)

**You may contact a Paragon Hotline Communications Specialist by dialing 1-800-574-8637 or go on-line to [www.Paragonhotline.com](http://www.Paragonhotline.com) to confidentially file your report, seven days per week, 24 hours a day.**

All calls and web reports will be promptly assigned to the designated Company contact for a response. You may call or file a web report anonymously.

## ***Drug-Free Workplace***

As part of the goal of maintaining a safe work environment, the Company has established a strong commitment to maintain a drug-and-alcohol-free workforce.

The illegal manufacture, distribution, possession, use, or being under the influence of narcotics, drugs or alcohol is strictly prohibited by all employees while on duty, in uniform, or on Company and/or client premises. Any illegal substances found in the workplace will be confiscated and turned over to the appropriate law enforcement agency immediately. The Company's program includes the following, in accordance with applicable state law:

- Post-Offer Drug Screen
- Reasonable-Cause Drug Test
- Post-Injury / Accident Drug and / or Alcohol Test (only if there is reason to believe drug and / or alcohol use caused or contributed to the cause of the workplace injury / illness and as permitted under applicable state law);
- Random Drug testing (where required by contract and/or permitted by state law).
- Under certain circumstances, applicants and employees may undergo alternative drug testing methods

Applicants or employees who test positive for alcohol or for drugs that are illegal under federal law will not be hired, or if already employed, will be terminated, as permitted under applicable law. A positive drug test for marijuana will disqualify an individual from employment or continued employment, regardless of whether marijuana has been legalized for recreational or medicinal purposes under state law, unless the applicable state law provides otherwise.

All employees are provided a copy of the Paragon Drug-Free Workplace booklet. Any employee who violates the Drug Free Workplace policy will be subject to disciplinary action, up to and including termination. If you do not have a copy, you may obtain one by contacting your management office. If you see any illegal drug activity while at work - report it to a supervisor, Human Resources, a member of management or the Paragon Hotline.



## *Preventing Violence in the Workplace*

As part of the goal of maintaining a safe work environment, Paragon has a zero-tolerance policy regarding violence in the workplace. Acts or threats of violence, including intimidation, harassment and/or coercion will result in immediate employment termination. The prohibition against threats and acts of violence applies to all persons involved in Company operations including, but not limited to, Paragon personnel, contract workers, temporary employees, and anyone else on Company or client property.

### **Reporting Unsafe Conditions and Security Risks**

If you become aware of any actual violence, pending violence or threat of violence, immediately contact local law enforcement by dialing 911 and follow your post orders for additional reporting requirements. Immediately after contacting law enforcement / authorities, report the incident to your direct supervisor or another member of Paragon management.

You should always know your written post orders. They will explain additional duties and responsibilities for handling emergency situations and should contain the names and telephone numbers of individuals to contact in various emergency situations. You may also call the Paragon Hotline (1-800-574-8637) if you are unable to reach supervisory or management personnel.

In the event of a natural disaster, you should be familiar with the client's emergency evacuation plans and any information included in your post orders relative to natural disasters. Your supervisor is responsible for ensuring that security officers understand and comply with all safety rules, regulations, and procedures. If you have questions, seek clarification from your supervisor.



# PROFESSIONAL DEVELOPMENT

Paragon is committed to the ongoing professional development and recognition of our security officers. We want to be the best, so we want you to be your best! Development is a core focus of our operations; well-trained professionals provide superior service and satisfied clients. At Paragon, we truly believe that our People Make the Difference.

Professional development can help you increase your expertise, give better client service, and have more satisfaction on the job. Paragon practices, promotion from within Paragon, whenever possible. Training and development can help you prepare for advancement.

To help you excel on the job, Paragon has a full range of professional training, recognition, and communication programs.

## *Training Programs*

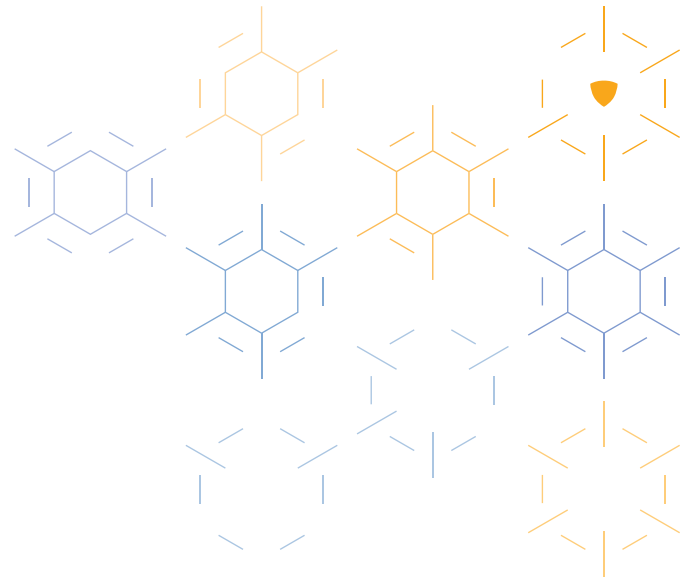
Paragon invests in training because “people make a difference” in the quality of service that we provide our clients. In today’s world, well-trained security is the best hope for first response, and it is our mission to provide the best—the best people with the best training methodology and programs. Continually educating and encouraging individuals to reach their full potential are important parts of Paragon’s quality improvement vision. Paragon believes that a learning organization, coupled with a responsive, knowledgeable workforce able to adapt to change, is essential to serving its customers effectively and improving work processes and performance.

Training and certification will be grouped into three phases: Pre-Assignment, Initial On-The-Job Training, and On-Going and Refresher Training. Our training professionals prepare and coordinate a broad range of training resources with a significant portion of training delivered via the Learning Management System (“LMS”), which is Paragon’s proprietary online security training technology designed to create the finest e-learning program in the security industry. Completion of training is done according to applicable law.

Paragon requires all personnel to receive a baseline level of training. Additional training programs are tailored to the specifications of each contract. If you’re interested in advanced training, you need to get approval from your Program Manager. Some available programs include:

- Advanced Certification Training (ACT) - Premiere professional security officer training program. Successful completion of all three courses results in the designation of Professional Security Officer.
  - » Emergency Response
  - » Terrorism Threat Awareness and WMD Training for Security Officers
  - » Vigilance & Preparedness: A Response to Uncertain Times
  - » Bomb Threats
  - » First Aid and CPR
- Industry-Specific Training
  - » Banking/Financial Security

- » Campus Security
- » High-Tech Security
- » Lodging Security
- » Logistics Security
- » Port Security
- » Retail Security
- » Shopping Center Security
- » Commercial Building Security
- » Gated Communities
- » Petrochemical Security
- » Healthcare Security
- » High-Rise Security
- Certified Security Supervisor Program



## ***Recognition Programs***

Paragon appreciates our security officers' outstanding performance. We have a number of discretionary recognition awards to help us show our appreciation including:

- Certificate of Training — for completion of training.
- Certificate of Merit — for outstanding service.
- Client Service Awards — for distinguished service.
- Officer of the Year — the Officer of the Year receives a cash award and commemorative plaque.
- Supervisor of the Year — the Supervisor of the Year receives a cash award and commemorative plaque.
- Support Person of the Year — the Support Person of the Year receives a cash award and a commemorative plaque.
- Paragon Honor Society – those employees displaying an exemplary dedication to Paragon values will be inducted into the Honor Society and receive a commemorative plaque.
- Paragon Heroism Award — this prestigious national award is presented following heroic efforts on the part of any employee. Recipients receive a substantial cash award and a commemorative plaque at an honor ceremony.

## **STANDARDS OF CONDUCT**

It is Paragon policy that actions taken by the Company and by each employee should be lawful and satisfy high ethical and moral standards.

All employees should be alert to situations that could result in the violation of a Company policy. As security officers, we strive to conduct business according to our core values: Integrity, Vigilance, Compliance.



## ***Business Ethics***

The success of any business depends, in part, on the honesty and integrity of its employees. Ethical conduct is good business. The trust and respect of fellow employees, customers, suppliers, competitors, and the general public depends upon adherence to high ethical standards. It is Paragon policy that our business be conducted according to such standards.

If you are asked to go against an established policy or practice, whether by a supervisor, another employee or by a client, you have the right and personal responsibility to report the issue and clarify any ethical questions you may have. This includes addressing the matter with the appropriate supervisor, contract management, Human Resources or the 24-hour Paragon Hotline reporting system to obtain clarification and understand the issue in question.

## ***Compliance Guidelines***

Paragon is committed to preventing and detecting criminal and / or unethical conduct within our organization. The goal is to comply with applicable laws and to promote and maintain our reputation for integrity and honesty. We ask all employees to be vigilant in supporting this goal by promptly reporting any offenses to the Program Manager, Human Resources Department, or the Paragon Hotline.

## ***Competition***

Employees must never reveal trade secrets or proprietary business information such as client service rates, to any individual outside Paragon. Such information is limited to those with a business “need to know” within the Company. Any attempts to gain such information by outside Paragon personnel must be reported through your chain of command to the Human Resource Department.

## ***Political Activity & Contributions***

No contributions of Company funds, property or services for political purposes shall be made directly or indirectly by or on behalf of the Company, unless permitted by applicable law and approved by the President or CEO.

No employee will solicit political contributions while on Company or client premises. This policy statement relates only to contributions made by or on behalf of Paragon and is not intended to discourage employees from making contributions of their own resources or time to the candidates or political parties or issues of their choice.

Paragon will not reimburse employees directly or indirectly for contributions they make on their own or for contributions they make to the Company’s political action committee.

## *Attendance Standards*

All employees are expected to maintain satisfactory attendance and report to work on time every day. Due to the critical nature of your job, and the need to correctly staff security posts at all times, you are required to report to work as scheduled. You will be notified of your schedule and break periods, if applicable. You are required to be at your post and ready to begin work at your scheduled start time.

If you do not report for duty or call to report an absence or late arrival, you will unfairly inconvenience a fellow employee, create scheduling problems, or leave a client facility unprotected. You are considered late if you are not at your work area at the starting time of your shift. You are not required to be early for your shift, but you must not be late.

You are expected to personally call your supervisor and / or the scheduler as far in advance as possible, and not less than six (6) hours in advance of the start of your shift when you know that you will be absent, late, or must leave work early, in order to allow for the necessary replacement.

To avoid mistakes and misunderstandings, you should personally place the call. If your supervisor is unavailable, notification should be made to the next level of authority within your contract office. Leaving a voice mail or text message is not considered acceptable notification.

For sites without a Collective Bargaining Agreement in place, the following excessive absenteeism policy shall be enforced: The bona fide use of sick leave may excuse an absence under this policy.

- First call off or tardy in 12-month period: Verbal counseling
- Second: Written counseling
- Third: 1-day suspension
- Fourth: 3-day suspension
- Fifth: 5-day suspension
- Sixth: Termination

This is a strict liability policy, with management discretion to excuse an absence in compelling circumstances.

Open Post. An Open Post occurs when a post that is required to be staffed under the Company's contract with the Government is not staffed in accordance with the post schedule – e.g., it is left "open." Notwithstanding the progression of discipline set forth above, if an employee's unexcused lateness reporting to work causes an Open Post, a three-day suspension will be given on the first offense. On the second such offense within any consecutive 12-month period, a five-day suspension will be given. On the third offense within a consecutive 12-month period, the employee will be terminated.

The Company retains the right to waive such suspension if it is determined that the lateness reporting to work was the result of circumstances entirely beyond the employee's control. However, it must be understood that traffic delays and congestion, weather delays, childcare issues, and similar circumstances are part of every employee's daily commute, and it is the employee's responsibility to anticipate such delays and structure their commute accordingly.

**Nothing in this section allows an employee to report or depart from work in a manner which contradicts management's directions.**

If your absence is due to illness, the Company may request that you furnish a doctor's certification.

When requesting a day off, you will be required to follow the guidelines established by management. Failure to report to work or notify your supervisor of your absence within the proper timeframe ("No call, no show") is a serious violation of Company policy. It is also a policy violation to leave post without proper relief or authorization from Company supervision. This is considered "job abandonment".

Failure to show up or call may be considered grounds for termination.

## ***Non-Solicitation Policy***

The purpose of Paragon's non-solicitation policy is to maintain an orderly workplace, to avoid intrusion upon employees and others, and to preserve employee safety and security for Paragon and its clients as to premises, funds, supplies, records, and confidential information. Accordingly, all employees are to observe the following rules and report violations to their supervisors. This policy includes charity solicitors, salespersons, questionnaire surveyors, union organizers or any other solicitor or distributor.

- Paragon employees may not solicit for any purpose during work time. Work time includes that time for which the employee is paid and expected to be performing work. Work time includes both the soliciting and/or the solicited employee's work time. Work time excludes meals or break periods.
- Paragon employees may not distribute or post literature during work time or in work areas.
- Except for legitimate Paragon purposes, and with prior authorization, individuals not employed by Paragon may not at any time solicit, survey, petition, or distribute literature on Paragon property.

## ***Safety Policy***

Paragon is committed to creating and maintaining a safe and healthy work environment. Prevention of accidents is a Company goal and requires your cooperation. Please make it a part of your job to work safely and assist in the prevention of accidents to yourself, client employees and co-workers.

Familiarize yourself with all safety regulations and report any unsafe work condition or injury to yourself and/or any other individual by contacting your supervisor immediately and documenting it on an Incident Report. Report any unsafe or unhealthy situations. Immediate action on your part could prevent an accident or injury to a co-worker, a client employee or yourself. Supervisors are responsible for helping you understand and comply with Company and client safety rules, emergency plans, regulations, and procedures.

Paragon's Safety Policy is based on the following guidelines:

### **Company Commitment to a Safe and Healthy Workplace**

Maintaining safe working environments is one of Paragon's most important goals. The Company

will not knowingly permit unsafe working conditions or permit employees to engage in unsafe acts. The Company will comply with all applicable workplace safety and health requirements and promote occupational safety and health standards that equal or exceed the best practices in the industry.

The Company will provide safety training and guidance to employees and will work to ensure that all employees comply with safety procedures and regulations in accordance with OSHA guidelines.

Reports of any unsafe and/or unhealthy issues will be promptly investigated to determine the cause and prevent the recurrence of similar issues. The Company encourages all employees to provide suggestions and recommendations for achieving a safer, healthier workplace.

### **Employees Should Report all Safety Concerns**

Paragon requires that employees work safely and assist in the prevention of accidents in the workplace. Signs, posters, and client Post Orders are made available to ensure that you consistently work in a safe manner. If you have questions regarding safety, supervisors, managers, and Human Resources are available to assist you in understanding all safety procedures and regulations.

Employees should report all safety and/or health issues, including occupational illnesses and injuries in a reasonable period of time, proportionate to the seriousness of the injury or illness. Prompt and appropriate reporting will allow the Company to immediately address the issue and assist the employee in seeking prompt medical attention if necessary. The timely reporting of injuries or illnesses will also enable the Company to notify fellow employees of the safety and / or health concerns in the workplace and help to prevent additional employee exposure. Retaliation for reporting work related injuries or illnesses is prohibited.

### **Reporting Unsafe or Unhealthy Working Conditions**

The Company provides multiple avenues for reporting unsafe or unhealthy working conditions. If you or another employee identifies a potentially unsafe or unhealthy condition or situation, you should immediately contact your supervisor and document the issue(s).

This should be done so supervision can take the noted concern to the client to get the condition or situation corrected and the hazard eliminated. The other option is that employees may also report such issues directly to management, and / or file a report with the Company's 24/7, anonymous-enabled Paragon Hotline (1-800-574-8637 or [www.securitashotline.com](http://www.securitashotline.com)), or as otherwise indicated by client Post Orders. Following this process is highly encouraged as it gives the Client and the Company a chance to give immediate attention to the issue and complete the remediation of the hazard quickly. If a safety concern is not addressed in a timely manner, then officers are perfectly within their rights to file a complaint with OSHA.

Paragon prohibits retaliation against any person who, in good faith, reports a complaint, testifies, assists, or participates in any investigation or proceeding conducted by Paragon or government enforcement agency. Employees who engage in retaliatory behavior will be subject to disciplinary action, up to and including termination.



## *Uniforms & Appearance*

In the security business, your appearance identifies you as a security officer and reflects your professionalism.

You will be issued either “wash-and-wear” or “dry clean- only” uniforms, at no cost to you. Wash-and-wear uniforms are designed and manufactured to be highly durable and require minimal maintenance. You are required to maintain your uniforms, shoes, belts, and any other uniform related items in a neat and clean condition, just as you maintain your normal clothes.

If you are issued a wash-and-wear uniform, the maintenance requirements are as follows: wash, dry in dryer, or drip dry, and hang up. Standard military-style company uniforms do not require dry cleaning, ironing, or any special treatment. Maintain these uniforms in the same manner in which you would maintain your normal wash- and-wear clothes. If your uniform contains a manufacturer’s safety instruction, such as “soft iron” or “cool iron,” be aware that these are only safety warnings to avoid damage to the material, and not directives that you iron the garment. Paragon does not require employees to iron uniforms.

If you are issued a uniform that requires dry cleaning, the local contract office will make arrangements to either provide clean uniforms to you or reimburse you for dry cleaning expenses. Contact your local contract office if you have any questions as to uniform dry-cleaning expenses.

You are also required to maintain shoes, belts, and any other uniform-related items in a neat and clean condition. This means maintaining these items in a manner similar to your normal shoes, belts, etc. If you have any questions as to how to maintain your shoes, belts, or other uniform-related items, please contact your contract office for instructions.

If your uniforms require repair or alterations, or are worn out, please contact your contract office for instructions. If you have any questions or concerns regarding uniform maintenance, please contact your contract office.

Acceptable personal appearance and personal hygiene is an ongoing requirement of employment. Radical departures from conventional personal grooming and hygiene standards are not permitted. You will be provided with the appropriate uniform, but it is your responsibility to make sure that the uniform is kept clean and neat. Contact your supervisor immediately if your uniform becomes damaged or unwearable.

You **must** comply with the following personal appearance standards.

- You must wear prescribed Company uniforms.
- Only conventional belt buckles may be worn; ornate buckles are not acceptable. Unauthorized pins, patches or devices may not be worn. Absolutely no political, religious or other organizational symbols of any kind may be worn while on duty or in the work area.
- Basic black duty belts and socks are required. All duty gear including cap visor, belt, holster and shoes are to be properly maintained.
- We recommend that you wear appropriate undergarments under your uniform. In those

instances, where ties are not a part of your uniform issue and open-neck shirts are permitted, only white tee shirts may be worn.

- Your hairstyle must be neat and styled in a manner that is appropriate in the work environment. Unconventional or extreme colors of hair and / or hairstyles are not acceptable. Hair ornamentation that is considered unconventional in style or color is inappropriate while in uniform. For example, excessive or unconventional clips, beads or feathers in your hair would not be considered appropriate in the workplace. Hair bonnets, “doo-rags,” kerchiefs, and similar hair coverings are not permitted unless specifically authorized by Human Resources. If you have a question about a particular hairstyle, contact Human Resources to confirm approval.
- Fingernails are to be clean, neat, and not extreme in length or color.
- Extreme looking facial hair such as mutton chops, handlebar mustaches, goatees and Van Goghs are not acceptable. Beards, sideburns and / or mustaches may be worn if authorized by contract management and must be neatly trimmed.
- For female employees, one earring per ear may be worn. Acceptable earrings are to be small hoop and “stud-like” in size and conservative in style and color. Over-sized earrings are not permitted.
- For male employees, earrings may not be worn while working. Excessive jewelry may not be worn unless previously authorized by your contract management.
- Visible body piercing accessories or visible tattoos are not permitted.
- Paragon shoulder patches or client-furnished patches are the only acceptable insignia while on duty or in the work area.
- When you wear an issued jacket, the breast badge must be on the outer garment and visible. Only jackets, coats or raincoats issued and approved by Paragon may be worn over your uniform during work hours.
- Where required, Company-issued caps must be worn at all times except when you are inside a vehicle or facility, or when special safety head gear is required. “Doo Rags” are not permitted.
- You may not wear your uniform while you are off- duty except when you are traveling to and from your assigned post.
- When in uniform, you must not enter bars, lounges, taverns, casinos, or other places where alcoholic beverages are served, unless you are assigned to such an establishment while on duty. You are not authorized to substitute personal items of clothing for Paragon uniform issued items.

If you do not meet the standards of this policy, you will be required to take corrective action, which may include leaving the premises. You will not be compensated for any work time missed because of failure to comply with this policy.

Reasonable accommodations will be made for those employees whose religious beliefs or medical conditions require deviations from this policy, consistent with client requirements and safe operation of the business.

Contract management has the authority to modify the appearance standards set forth in these guidelines, according to business and client requirements. Nothing in this section allows an employee to dress in a manner which contradicts contract management’s directive.



## ***Post Orders***

Each assigned contract will have certain requirements for maintaining security on their premises. These requirements will be explained in a document called “Post Orders”. You must know the post orders applicable to your site and comply with them. If you have any questions or concerns, contact your supervisor.

If you encounter post orders that contain provisions that do not comply with standard Paragon policy, or applicable law, or if the post orders cause you any concern, report the matter to your supervisor, contract management, Human Resources, or the Paragon Hotline.

## ***Company Issued Tools & Equipment***

All equipment and/or tools required to perform job duties will be provided by Paragon and / or the client site where you are assigned. On termination of employment, all equipment provided must be promptly returned

## ***Company & Client Communications Equipment***

Paragon and client telephones are to be used for business purposes only. You must refrain from making personal calls from Company and client telephones except in the case of an emergency.

Telephones, cell phones, 2-way radios, voice mail, computers, electronic mail (e-mail) systems and Internet access are maintained by Paragon and/or the client in order to facilitate business. Therefore, all messages sent, received, composed and/or stored on these systems are the property of Paragon or the client, as the case may be. If your message does not relate to Company business, is not an emergency and/or is not one you would want shared with your supervisor, or local Paragon management, please do not send it on Company and/or client equipment.

Transmitting or downloading of violent, pornographic or other inappropriate materials is strictly prohibited. All resources belonging to Paragon or the client are to be used for business purposes only.

Unless specifically authorized by contract management, all personal electronic devices including personal cell phones, recorders, pagers, digital cameras and personal laptop computers should be locked in employee automobiles or another area designated during the time an employee is on post or at work.

If approved by your supervisor, you may use a personal telephone at work, but personal use may only take place during an authorized break, and if such usage is allowed it must not interfere with the performance of your job.

Workers who damage Company or client equipment through intentional misconduct will be required to pay for damages, where permitted by state law. All employees assigned a Company cell phone must comply with all state laws regarding “hands free” usage, and/or the usage of cell phones.

The Company reserves the right to monitor and inspect company and client equipment.

## *Use of Computer Software*

Paragon holds ownership rights to computer software programs or licenses and the right to use such programs obtained from outside companies. Paragon and its employees have no authority to reproduce an unauthorized copy of copyrighted computer software application or its documentation unless otherwise stipulated by the copyright holder. Additionally, you may not reproduce any software owned by Paragon.

All employees are to use software products in accordance with the license agreement for all local area networks (LANS) and multiple-computer networks.

If you are aware of the unauthorized use of Paragon computer software applications or related documentation within Paragon you must immediately notify your local branch office. Paragon employees, who reproduce, acquire or use unauthorized copies of computer software products may be subject to disciplinary action up to and including termination.

## *Acceptable Usage and Electronic Communications*

All Paragon employees are required to adhere to the following guidelines with regard to electronic communications. This policy also applies to consultants and contractors who have agreed to and acknowledged this policy, and covers all Company and client electronic data and communication equipment, including but not limited to: Electronic Email, Computers, Instant Messaging, VPN Connections, Telephones, Network, facsimile machines, Dial-Up Connections, Internet publishing, Flash drives/memory sticks, Wireless connections, External hard drives, Cell Phones, Cameras, Personal Digital Assistants(PDAs), Pagers, Copiers, Tape Recorders, Voicemail Systems, Text Messages, etc.

### **Appropriate Usage**

- Legitimate Company business use
- Consistent with all Company policies
- Appropriate business etiquette
- Proper identification
- Emergencies

### **Prohibited Usage**

Employees are prohibited from using Company or client electronic equipment or devices to knowingly create, view, display, transmit, retrieve or store any data, material, or information that is:

- Personal use (except emergencies with supervisor or management approval) or use for personal gain
- Spam, chain letter or mass emails
- Illegal communication
- Political activities
- Rude, obscene or inappropriate communication



- Misrepresenting or concealing one's identity
- Discriminatory or harassing communication or any communication inconsistent with Company policies or Company business interests
- Communication directly or indirectly intended to diminish the business interests of Paragon
- Communications directly or indirectly intended to induce any employee to leave the employment of Paragon
- Communications to unauthorized persons regarding Paragon trade secrets and / or proprietary, confidential business information
- Electronic hacking

## ***Communications***

Appropriate Business Etiquette and Proper Identification: Paragon and its clients provide Security Employees communications systems necessary to perform the assigned duties required by the Company or client. All Company policies must be adhered to and appropriate business etiquette must be followed. Senders of an electronic or telephonic message should always accurately identify themselves by name and title.

Personal Use Prohibited: Company or client electronic devices to include telephones, computers, and facsimile machines must not be used for personal use. Exceptions may be permitted for personal emergencies, with your supervisor's or management's authorization.

Monitoring: Employees may work at sites where telephone monitoring and/or recording occurs: You may be subject to the monitoring of your use of Company and client electronic devices to include telephones, computers, and facsimile machines. Some Company and client facilities are equipped with security cameras; employees assigned to these facilities may be videotaped.

Recording: Employees are not permitted to record things at work except when directed by post orders or when directed by supervisor, or manager, or for legitimate business purposes (such as a safety issue), and as permitted under applicable law. Tape recording disciplinary sessions and/or investigations are only permitted according to applicable law. If questions arise regarding this provision, contact your Vice President, Human Resources.

Strictly Prohibited Uses: Employees are strictly prohibited from using Company or client electronic equipment to knowingly transmit, retrieve, or store any material that is

- Harassing or threatening
- Discriminatory, derogatory or defamatory to any individual or group
- Obscene and/or pornographic
- Illegal or contrary to Company policy or business interests
- Makes unauthorized representations on behalf of the Company

Spam Emails: Employees may not send spam via Company or client messaging systems. Spam includes, but is not limited to the following:

- Advertisements
- Humor
- Chain mails
- Personal gain schemes
- Political or religious purposes

Removal of Equipment from Company or Client Premises: Company or client communications or equipment may not be removed from Company or client premises without written authorization from your Supervisor or Program Manager.

Breaching Employee Confidentiality: Employees must respect the privacy and confidentiality of other employees' electronic communication, and data. Employees are prohibited from engaging in, or attempting to engage in the following:

- Monitoring or intercepting files or electronic communications of other employees, client employees, or third parties;
- "Hacking" or obtaining access to systems or accounts to which they are not authorized;
- Searching and viewing data not related to one's own job responsibilities;
- Using log-ins or passwords of others;
- Breaching, testing, or monitoring computer, network, or telephone systems without management authority;
- Browsing or looking at another user's communications and data unless this is part of their job function, or they directly manage that employee.

Cameras: Employees are not permitted to take pictures while on duty unless required by Post Orders, or when directed by your supervisor or manager, or for legitimate business purposes (such as a safety issue), and as permitted under applicable law. This applies to cell phone cameras and/or any other photographic or video devices.

Harmful Business Communications: Communication directly or indirectly designed or intended to induce any Paragon client to discontinue using Paragon's services, to diminish the level of services being provided by Paragon or to employ the services of a provider other than Paragon is strictly prohibited.

### **Harmful Employment Communications**

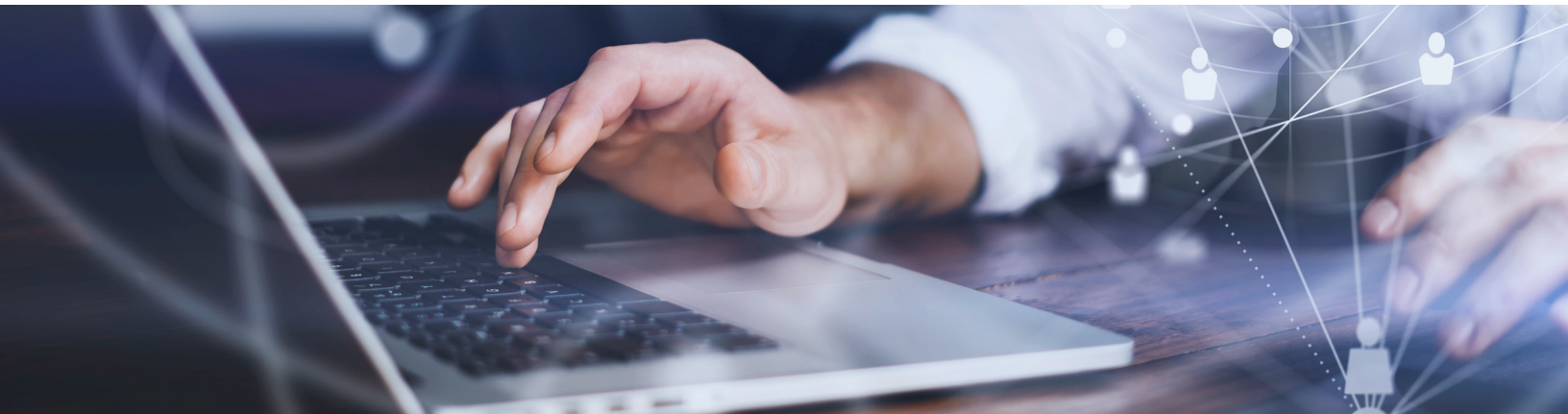
Communication directly or indirectly designed or intended to induce any Paragon employee to leave the employment of Paragon is strictly prohibited.

Proprietary Leaks: Communication to unauthorized persons regarding Company or client trade secrets and/or proprietary and/or confidential business information is strictly prohibited. All data and messages transmitted and/or stored on Company and client systems are considered to be the property of the Company or client. All internal Company and client information should be assumed to be proprietary, unless otherwise designated by management.

**Monitoring and Review:** The Company and client reserve the right to review and monitor all information stored, transmitted, received, or contained in any electronic format on their equipment and systems. Anyone accessing these systems expressly consents to such monitoring and is advised that if monitoring reveals possible evidence of criminal activity, Paragon may provide the evidence of such activity to law enforcement officials, pursuant to applicable law.

Employees who abuse the privilege of Company- facilitated access to electronic media or services are subject to corrective action including:

- Suspension or termination of privileges to any or all systems
- Suspension or termination of employment



## ***Social Networking***

Employees are prohibited from conducting personal blogging or social networking activities while working, as well as prohibited from using any employer or client- owned equipment, including computers, cell phones or other electronic equipment for such activities.

Internet postings that are disrespectful to the company, its employees, clients, partners, and affiliates are strictly prohibited. Employees are responsible for their online commentary on blogs and social networking sites, and content that indicates violation of Company policy may lead to disciplinary action, up to and including termination. Some examples are, but are not limited to, the following:

- Commentary that is considered threatening or menacing;
- Company or client privileged information, including propriety and copyrighted information, trademarks, trade-secrets, logos, company or client issued documents, security related procedures and systems, and other information deemed confidential;
- Unauthorized photographs of other employees, clients, or vendors, or of client property and facilities;
- Commentary that violates Paragon's policy prohibiting harassment and other forms of discrimination, including but not limited to hate speech, racial epithets, and obscene or sexually offensive material
- Commentary that maliciously disparage the quality of products or services of Paragon or its clients.
- Depiction of illegal or unethical conducts, or other conduct that is not in keeping with the Company's core values and business interest.

Any employee who engages in such conduct or otherwise violates this policy may be subject to personal liability, as well as discipline and possible termination by the Company.

Additionally, if you choose to identify yourself as a Paragon employee, you must state that your views expressed in your blog or social networking site are of your own and not those of the company.

*Note: Nothing in this Acceptable Usage and Electronic Communications Policy is intended or should be construed to interfere with employee communications regarding wages, hours or other terms and conditions of employment, or to interfere with our employees' ability to engage in collective or concerted activity for their mutual aid or protection as authorized by Section 7 of the National Labor Relations Act. By way of example, refusing to perform an act directed by management based on an employee's good faith belief that the act would be unlawful or unsafe is not "insubordination" within the meaning of this policy. Similarly, voicing good faith concerns about the terms or conditions of employment is not necessarily "derogatory" conduct prohibited by this policy and/or conduct against the best interests of the Company, as that term is used in this policy.*

## **Employee Arrests & Convictions**

If you are arrested, charged with or convicted of any crime during the course of your employment, you are required to notify Paragon management within twelve (12) hours, regardless of whether or not you are incarcerated. In many areas, criminal convictions have an impact on your ability to carry a security officer's license and may be grounds for termination. Your employment will be terminated at any time such license is revoked.

Upon notification to Paragon of an arrest, and depending upon the circumstances, you may be placed on an unpaid leave for the duration of the legal proceedings. This policy shall be applied as permitted under applicable law.

## **Confidential Information**

Paragon's and the client's trade secrets; confidential and proprietary information; and other internal information represent valuable assets. Protection of this information is vital to the Company's efforts to remain a viable business competitor. A trade secret is treated as property, usually in the form of information, knowledge or "know-how." Be alert for evidence that proprietary or trade secret information is being mishandled. This information should always be secured. Your continuing obligations with respect to the proprietary and trade secret information of Paragon and the client are as follows:

- This information may not be disclosed to people outside of Paragon and the client;
- This information is not to be used for one's own benefit or for the benefit of people other than Paragon and the client; and
- This information may only be disclosed to other Paragon and client employees on a "need-to-know" basis.

Special safeguards should be observed for Company information classified as “Paragon Private” or “Paragon Proprietary.” These classifications impose “need-to-know” restrictions. Trade secrets and proprietary information includes, but is not limited to, business and strategic plans, divisional and regional revenues, hours of service, costs and profits, unpublished financial/pricing information, employee rosters, customer lists, vendor lists, detailed information regarding customer requirements, preferences, business habits and plans, computer log- on codes and passwords. You should contact your supervisor if you have a question regarding trade secrets or proprietary information.

Employees who leave Paragon have an obligation to not disclose Company trade secrets and proprietary information, unless the information becomes publicly available, or Paragon no longer considers it a trade secret. Correspondence, printed matter, documents of any kind, procedures, and special Paragon methodologies, whether classified or not, are all the property of Paragon. Any employee who violates these policies will be subject to discipline, up to and including termination of employment.

### ***Conflict of Interest***

While working, employees are required to devote full effort, energy, and loyalty to Paragon. Paragon strictly prohibits any outside employment or other activities or relationships that create an actual, perceived, or potential conflict of interest, discord, disruptions, or distractions that interfere with workplace productivity, or may be in competition with Paragon. You must advise and consult with management regarding this policy before becoming involved in outside employment, activities or relationships that could violate the policy.

### ***Outside Employment***

Employees must carefully review all outside employment arrangements with respect to conflicts of interest. Outside employment will be permitted if:

- The outside employment does not interfere with your ability to successfully perform your Paragon job duties;
- The outside employment will not reflect unfavorably on Paragon;
- The outside employment is not conducted or solicited in any manner while you are on duty;
- The outside employment is not conducted or solicited from Company facilities or while using Company- owned equipment or supplies.

Paragon requires that employees advise management prior to accepting outside business activity or employment. Paragon employees are not permitted to work for any other affiliated companies at the same time.

### ***Employment of Relatives & Workplace Relationships***

Employees’ relatives will not be eligible for employment with Paragon where supervision, safety, security, morale, or other potential conflicts of interest may exist. Relatives include an employee’s spouse, parent, child, sibling, aunt, uncle, in-law, foster parents, step relationship and cohabiting employees, dating couples, fiancés, or life partners.



Romantic or sexual relationships that create conflicts of interest, potential charges of sexual harassment, discord or distractions that interfere with workplace productivity are prohibited.

All questions and issues relating to employment of relatives and/or consensual relationships must be addressed with your Program Manager. An employee in a close personal or familial relationship with a co-worker or client employee must inform Paragon management immediately.

### ***Release of Company Information / Media Inquiries***

You are not authorized to issue any statement, written or oral, to any news media representative or grant any public interview pertaining to Paragon's operations or financial matters. If you are contacted by a news media representative, please indicate that you have "no comment" and refer them to contract management. Contract personnel will forward all requests for information to the Paragon Corporate Headquarters for an appropriate response.

### ***Employment Verification***

All requests for verification of current or prior employment may be submitted to The Work Number®. Whenever you need to have your employment or salary data verified, such as for mortgage applications, reference checks, loan applications, or apartment leases — anything you need that requires proof of employment, you are to contact The Work Number® by calling 1-800-996-7566 or through the Internet at [www.theworknumber.com](http://www.theworknumber.com). All requests received by branch offices or management for verification of current or previous employment will be referred to The Work Number®.

### ***Safeguarding of Personal Information***

Paragon considers personal employee information as confidential and, as such, will be safeguarded and shared only as required. The Company will only collect personal information that is needed for its business operations and to abide by government reporting and disclosure requirements. Personal employee information records will be kept in secure areas with access restricted to those who have a need for such access. Paragon is committed to abiding by the provisions of all applicable state and federal laws related to the safeguarding of employee information.

### ***Smoking***

Smoking (including e-cigarettes) and chewing tobacco are prohibited in all locations on Company and client property including inside Company vehicles, client vehicles, leased vehicles, and personal vehicles if being used while on duty. Employees are not permitted to smoke while on post. Only if approved by the client, smoking may be done within specifically designated smoking areas. Specific client sites may prohibit smoking or chewing of tobacco at any time on their premises.

## ***Possession of Firearms & Weapons***

Safety is a top priority at Paragon. You may not possess unauthorized firearms, dangerous devices or weapons at work. This includes carrying a personal weapon or dangerous device on post, on client property, or in your personal vehicle parked at a job site or on Company property. Compliance with this policy is a condition of employment. The use, possession, sale, purchase or transportation to/from a job location of dangerous devices such as explosives, gun powder, or tear gas, or personal weapons, including firearms, by any security officer during his or her work hours or on Company business, is strictly prohibited.

Security officers who carry firearms as required by the client contract may only carry Company-issued weapons and ammunition, as directed by individual client contract. In all weapons transportation situations, firearms are to remain unloaded and stored in the trunk, or other locked compartment of a vehicle while being transported to or from any assigned contract site, and/or as required under applicable law. Company-issued firearms will not be altered in any way.

## ***Limits of Authority & Use of Force and Special Security Devices***

Security personnel generally do not have police powers beyond that of an ordinary citizen and must operate under the laws empowering private person arrests and use of reasonable force. Officers are not permitted to touch, search, or arrest any individual except under limited circumstances. The circumstances under which a security officer may touch, search or deter an individual are as follows:

- When the individual has freely and voluntarily consented to the search
- When acting in self-defense
- In making a legal citizen's arrest, upon witnessing a felony
- When protecting the safety of others
- At the instruction of law enforcement

Use of Force: Security personnel are required to exercise extreme caution and good judgment when considering the use of force. When faced with a clear and immediate threat of bodily harm, the security officer must always consider retreating with any other people present to a secure position.

A security officer must only use the degree of force necessary to repel an attack or threat of an attack. When a use of force situation arises, call the police for assistance and call Company management. Security officers who improperly use or apply excess force may be subject to disciplinary action and may be held criminally liable for their actions.

Documentation: In the event of any physical altercation involving a security officer, the officer must make every effort to secure names and addresses of all witnesses, along with names and addresses of person(s) involved. The officer will submit a detailed written report of the incident to appropriate Company supervision. This should be as soon as possible (preferably before end of shift, if officer is able) while all facts are still clear in the officer's memory.

Deadly force is never to be utilized for the protection of property or information. “Deadly Force” is any use of force that is likely to cause death or serious bodily injury. Deadly force must only be used to defend life. Security officers who improperly use or apply excessive force may be held liable for their actions in a court of law.

Special Security Devices: Generally, security devices are not appropriate or necessary for normal security assignments. Accordingly, security personnel do not carry or use special security devices unless the facts and circumstances of a particular post assignment indicate that the use is reasonable and appropriate. In every situation, special security devices must be authorized in writing by contract management. Such devices may include handcuffs, firearm, holster, ammunition carriers, mace or pepper spray, soft body armor / bullet proof vests or clubs. Unless approved by management, Paragon issues the equipment and officers are trained for its use. In addition, some states require security personnel to have permits to carry non-lethal weapons in addition to certified training. Applicable laws must be followed, without exception.

## ***Vehicles***

Whether driving a company vehicle, a rental / leased vehicle, or a personal vehicle while on company business, all employees must maintain a valid driver’s license for the state in which the employee resides and for the class of vehicle they will be operating.

Employees operating a Company, rental/leased, client, or personal vehicle while on Company business must comply with all local regulations, Company, and client driver safety policies. This includes complying with all applicable cell phone laws. Driving employees shall not operate any company/client vehicle at any time or operate a personal vehicle while on duty while using or consuming alcohol, illegal drugs, including marijuana, or prescription medications that may affect an employee’s ability to drive.

Employees are required to exercise reasonable care when using Company vehicles and equipment. If you are assigned a vehicle or equipment while on duty, you are responsible for keeping it clean. Employees are not permitted to smoke in vehicles.

Generally, only a supervisor on duty can sign for gas and oil. Each vehicle must be inspected prior to use. If a vehicle is not functioning properly or needs repair, notify your supervisor immediately. Employees operating a Company or client vehicle must comply with all driver safety policies including complying with all applicable cell phone laws.

Your contract management must approve repairs of vehicles. Any traffic violations due to the employee’s failure to comply with applicable laws will be the responsibility of the employee.

Employees who operate Company vehicles or client vehicles may not carry passengers without the written permission of the client and/or contract management. Paragon insurance requirements make this rule mandatory.

**PARAGON DOES NOT MAINTAIN INSURANCE FOR YOUR PERSONALVEHICLE.** You must have liability insurance when driving your personal vehicle in the performance of official duties and show proof of such insurance. Any such insurance must be consistent with Company policy.



Employees must immediately notify the local Paragon office of any legal or physical changes that would affect the employee's driving privileges or insurability. All employees that drive on Company business must have a driving record free of serious traffic violations as outlined in the Company Safe Driving Program.

Any employee involved in a vehicle accident with a Company, client, rental/leased or personal vehicle while on company business where there is reasonable suspicion that the employee may have been under the influence and/or where property damage occurs or there is medical treatment needed, will be subject to a drug/alcohol test, where allowed by state and/or federal law.

When you are asked to use your privately owned vehicle while on official duty, you will be reimbursed accordingly. Contract management, in accordance with federal guidelines, will determine the rate of reimbursement, and you will be so advised prior to your use of the vehicle.

## **YOUR EMPLOYMENT**

### ***Employment "At-Will" Statement***

Your employment with Paragon is "at-will," having no specified term, meaning that you or Paragon can terminate the employment relationship at any time, with or without cause, and without prior notice.

### ***Employment Classification & Status***

Introductory Period: Your first 90 days of employment are considered an introductory period. During this time, you will participate in an orientation to Paragon and receive any training required for you to perform your job duties. This "getting- acquainted" or introductory period gives your supervisor the opportunity to determine how well you perform your job. It also provides you the opportunity to decide if you are satisfied with the position.

Paragon reserves the right to extend the duration of the introductory period when determined appropriate at the Company's discretion.

Upon completion of the introductory period, an informal performance evaluation may be conducted. Your continued employment at Paragon will be determined by your performance and the needs of the business.

Full-Time Employee: For medical benefits purposes only, a full-time employee regularly works a minimum of 30 or more hours per week on a continuing basis and has completed the introductory period. For all other purposes, full- time employment is 40 hours per week / 2080 annually.

Part-Time Employee: For medical benefits purposes only, a part-time employee is hired for an indefinite period but works less than a normal workweek of 30 hours per week.

Non-Exempt Employee: Employees (such as security officers) who are covered by the Fair Labor Standards Act (FLSA) and applicable state laws are entitled to overtime pay.

**Exempt Employee:** Exempt employees (such as certain supervisors or managers) are exempt from overtime provisions and not entitled to overtime pay.

**Rehired Employee:** Former employees who left the Company in good standing may be eligible for re-employment. Employees who are rehired following a break in service in excess of 30 days, other than an approved leave of absence, are considered new employees from the date of re-employment and will be required to complete the new hire process. For purposes of certain laws and benefits, the employee's prior service will be counted where required by applicable law.

## ***Terms & Conditions of Employment***

Security officers are employees of Paragon and not the assigned contract site to which they are assigned. Clients contract with Paragon to provide services determined by a signed agreement. Based on client contracts and business necessity, you may be transferred to various clients, have a varied work schedule/workweek, different rates of pay and related benefits. Whenever you are on duty in or around a work site, it is important not to discuss Paragon business or work difficulties in front of clients. Your primary concern is client satisfaction. Problems or concerns should be addressed by contacting your immediate supervisor, Program Manager or Human Resource Department.

As a further condition of employment, you are required to cooperate with the Company and its clients during any investigation or any other procedure requested by management. Paragon policy strictly prohibits retaliation in any manner toward individuals who provide information in good faith during an investigation.

## ***Mandatory Arbitration***

Paragon has a mandatory arbitration program for resolving employment-related disputes. All non-union employees are subject to the Company's Arbitration Program. Arbitration is not intended to and does not replace existing internal Company dispute resolution mechanisms, such as informal complaints to supervisors or managers, Human Resources representatives or other Company representatives, or the use of the Company's Hotline. In the event a dispute between an employee and the Company cannot be resolved through informal means, the dispute will be resolved through binding arbitration, instead of the court system, except to the extent prohibited by applicable law.

Workers' Compensation and unemployment compensation benefits are not covered by the arbitration program. The arbitration program does not limit employees from filing workers' compensation claims or claims with the EEOC or other government agencies.

Application of the arbitration program may vary depending on applicable law. The terms and conditions of the Arbitration Program are contained in the Company's Dispute Resolution Agreement, which is provided to all employees. Please contact your branch office if you need a copy of the Agreement.

## ***Transfers & Promotions***

Paragon encourages the professional growth of all employees. When opportunities for promotion occur, we will consider current employees along with qualified candidates from outside Paragon.

Job openings may be posted on employee bulletin boards or in publications issued by your contract office. From time to time management will, when appropriate, fill job openings or make transfers without posting notices. If you request a transfer, you must have been in your current position for at least six (6) months, meet the requirements of the new position, and have a satisfactory performance record. A transfer out of a particular assigned contract site or out of the area is dependent on several factors. Please contact your contract Human Resources Generalist for details.

## ***Hours of Work***

It is a Paragon policy to comply with all applicable wage-hour laws. You will be paid for all time worked. Your supervisor will determine your schedule of hours, and your meal and rest periods will be determined according to the unique features of your post assignment. You will be advised when your official workweek begins and ends.

## ***Overtime***

Because of the round-the-clock nature of security work, your supervisor may schedule overtime or extra shifts when necessary. You will be paid overtime for hours worked in excess of 40 hours per week, except where in conflict with state law, in which case Paragon will follow state law. All overtime must be approved in advance by your supervisor.

Although an attempt will be made to give employees advance notice of the need to work overtime when it is feasible to do so, this is not always possible. Paragon will attempt to schedule overtime in a fair and consistent manner.

## ***Pay Periods***

Your local office will advise you of the frequency and timing of pay periods and paychecks.

## ***Lactation Accommodation***

Paragon will comply with all applicable federal and state laws in accommodating nursing mothers. Paragon will provide reasonable breaks from work to allow nursing employees to express breast milk. Reasonable efforts will be made to provide an appropriate area in close proximity to the employee's work area, other than a bathroom, which will be shielded from view and free from intrusion. The breaks will be unpaid except to the extent they run concurrently with other paid break time. If you have a need for such accommodation, please contact your Human Resources representative and/or management directly. They will generally respond within 5 business days.

## ***Timekeeping***

All employees are paid in accordance with applicable federal and state wage and hour laws. It is important that you are familiar with the timekeeping procedures to ensure proper payment of wages for all time worked. Rest periods and lunch periods may be scheduled by your supervisor to ensure that your position and duties will be covered.

If you voluntarily arrive early for work, but do not actually begin to work, you must only record the actual time work begins versus your arrival time. You are expected to arrive for work on time, neither early nor late. You are not to arrive at your post or commence any duties until your scheduled arrival time. You are not to congregate around a post location waiting for your scheduled arrival time. If you arrive early, you must wait away from your post until your scheduled arrival time, in order to avoid distractions and confusion.

Each employee is solely responsible for the accuracy of his/her timesheet and must advise management of any discrepancies even after the timesheet is submitted. Filling out another employee's time record or falsifying any time record is prohibited.

Employees are required to contact the Paragon supervisor or contract office if they encounter any problems or concerns regarding being paid for all time worked.

## ***Salary Wages***

You will be paid according to the client contract that applies to your assignment. If you work at more than one assigned contract site in a work week, with a different hourly rate at each site, the Company uses a weighted average to compute your average daily rate. This rate is also used to calculate the overtime rate. If you have a question about your pay, contact your supervisor or contract office.

## ***Personal Status Change***

You are to notify your contract office of any change in your personal status such as address, telephone number, withholding exemptions, etc. This is necessary to support scheduling efficiencies, as well as avoid confusion and errors, which could affect your pay or receipt of Company mailings.

## ***Leaves of Absence***

It is the practice of Paragon to grant a leave of absence in compliance with all state, federal and local laws. Unless specifically provided for otherwise, all leaves of absence are available only on an unpaid basis. If you have a need to request a leave of absence, check with Human Resources for eligibility requirements and more information.

Failure to return to work following the scheduled expiration of a leave of absence may be considered job abandonment and processed as a voluntary resignation.

FMLA Leaves of Absence: Paragon complies with the provisions of the federal Family and Medical

Leave Act (FMLA) and all applicable state and local family and medical leave laws. FMLA provides eligible employees with up to 12 weeks of unpaid, job protected leave during any 12-month period for qualifying reasons, and up to 26 weeks to care for a qualifying injured or ill military service member.

Eligibility: FMLA defines eligible employees as individuals who meet all of the following requirements:

- Have worked for Paragon for at least 12 months (52 weeks);
- Have worked at least 1,250 hours during the 12 months preceding the start of leave;
- Work at or report to a worksite where the Company employs 50 or more employees within 75 miles of the worksite.

Qualifying Reasons and Duration of Leave: Eligible employees may take up to 12 weeks of unpaid leave, during any 12-month period, for the following reasons:

The birth of an employee's child

- Care for a newborn or a child placed for adoption or foster care
- To care for a parent, spouse, or child who has a serious medical condition
- To recover from or obtain treatment for the employee's own serious medical condition

A serious medical condition is generally defined as a condition that requires any period of incapacity or treatment connected with inpatient care; any period of incapacity involving continuing treatment by a healthcare provider which requires an absence of more than three days; any period of incapacity, or treatment thereof, due to a chronic serious medical condition; or any incapacity due to pregnancy or prenatal care.

- A "qualifying exigency" arising out of a covered family member's active duty or call to active duty in the Armed Forces.

Eligible employees may take up to 26 weeks of unpaid leave to care for a spouse, son, daughter, parent, or next of kin who is a member of the Armed Forces, and who is undergoing medical treatment, recuperation, or therapy for a serious injury or illness incurred in the line of duty. Leave to care for an injured or ill service member, when combined with other FMLA qualifying leave, may not exceed 26 weeks in a 12-month period.

Employee Rights under FMLA: Employees who take leave under FMLA generally have the right to return to the same position held when leave commenced, or to an equivalent position with equivalent benefits, pay, and other terms and conditions of employment. seniority will also continue during the leave period. Under certain circumstances, employees may take family and medical leave intermittently or on a reduced leave schedule.

Employee Responsibilities: Employees are responsible for providing proper documentation to support leave covered under FMLA, prior to such leave being approved as FMLA. Depending on the type of qualifying leave, this may include medical certification from a licensed practitioner, such as a completed Certification of Health Care Provider form; or proof of a qualifying family member's call to duty or active military service. Periodic recertifications and/or fitness-for-duty reports may also be required.

If you believe that you may qualify for unpaid, job protected leave under the provisions of FMLA, you should notify the human resources representative at your contract office in writing, at least 30 days prior to your anticipated departure from work. If such notice is not possible, you are required to give as much notice as is reasonably possible under the circumstances. Upon receipt of your request, your contract office will notify you in writing of your rights and responsibilities and, when applicable, will provide you with the Certification of Health Care Provider form to be completed and returned. If you fail to provide appropriate certification of your need for leave or fail to return from your leave when scheduled, or fail to report in regularly during your leave, or fail to request an extension if needed, you may forfeit your rights under FMLA. Additional details on your rights and obligations under FMLA and complete Company policy are available at your contract office.

Pregnancy Leave: Paragon complies with all relevant state and federal laws in granting medical leaves of absence to pregnant employees when disabled due to pregnancy.

Medical Leave: Based on current business conditions and operational needs, Paragon may grant unpaid leave of absence for employees who are not FMLA eligible. A 30 days advance notice, if possible, and a doctor's certification will be required validating the need for time off for treatment of a medical condition. An employee on non-FMLA medical leave who is released back to work may apply or be scheduled for an available position for which he or she is qualified.

Personal Leaves of Absence: Paragon may grant a leave of absence for justifiable reasons for periods not to exceed 30 consecutive calendar days for employees who have had at least 12 months of continuous service. Your contract management in conjunction with the Director of the Office of Professional Responsibility has full discretion and makes the final authorization in granting any leave of absence. However, if for any reason the leave has been misrepresented or business needs require your return to work, the leave may be canceled. Due to scheduling requirements, Paragon cannot guarantee that requested time off will be granted.

Military Leave: Paragon will comply with all applicable federal and state laws regarding military leave of absence and returning veterans re-employment rights.

Jury and Witness Duty: A leave of absence resulting from jury duty or testifying as a subpoenaed witness will be granted in accordance with federal, state or local laws. You will be granted an unpaid leave of absence (unless applicable law requires payment, in which case we will follow applicable law) for this purpose, provided a notice is presented to your supervisor. When practical, you should continue to report to work on days when you do not report for jury duty. It is your responsibility to return to work immediately following the expiration of jury or witness duty. If you are required to testify as a witness in a Paragon -related case, or on behalf of a client, you will receive your appropriate wage for the period of time required by the legal proceedings.

Other Time Off: Paragon understands that you may occasionally need time off from work to address personal matters. Unless otherwise required by law, requests for time off work will be evaluated according to business necessity, scheduling needs and management discretion. Paragon will comply with its legal obligations by providing you time off, where necessary, to vote, to perform emergency duty as a volunteer firefighter, to appear at your child's school pursuant to the request of the school or to attend an adult literacy education program. Time off that is provided under this policy will ordinarily be unpaid except where the law requires that it be compensated.







## ***401 (K) Plan***

Paragon systems offers a 401k plan permitting pre-tax salary deferrals and a variety of investment options. Paragon is also participating employer in several union sponsored 401k plans.

Contact your Human Resources Generalist for enrollment information or for more information about your specific sponsored plan.

## ***Employee Assistance Program (EAP)***

In recognizing that the success of Paragon and our business depends upon the well-being of our employees, Paragon offers an Employee Assistance Program (EAP) to all full-time and part time employees who have completed 90 days of service and their qualified dependents.

Qualified employees and family members may receive assistance in managing life's challenges outside the workplace such as financial and credit problems, loss of loved-ones, personal relationship issues, substance abuse or dependency, concerns regarding parents or children, stress, anxiety and any other personal circumstances that may require skilled professional help.

For up to five face to face counseling sessions per family member, per incident, per year there is no charge to the employee. An employee or eligible family member may obtain assistance by dialing 1-855-LIF-MTRS (1-855-543- 6877), 24 hours per day, 7 days a week. Online member services are also available at [anthem.com/LifeMatters](http://anthem.com/LifeMatters). Access code is "securitas."

## ***Payroll Management***

Paragon offers all employees Direct Deposit for your paycheck. Advantages for Direct Deposits:

- Choose your own bank
- Deposit funds in up to three separate accounts
- No lost checks or delivery delays
- No check cashing fees

You will be able to access payroll information electronically via secure online access. If you are not able to access paycheck information, contact your local office to determine if there are other options available in your specific state.

## ***Worker's Compensation***

Paragon has Workers' Compensation insurance coverage, as required by law, to protect employees who are injured on the job. This insurance provides medical, surgical and hospital treatment in addition to payment for loss of earnings that result from work- related injuries. The cost of this coverage is paid by Paragon.

If you are injured while working, you must report it immediately to your supervisor within 24 hours, regardless of how minor the injury may be. If you have any questions regarding the Workers' Compensation Insurance Program, please contact your contract office.

## ***Holidays***

Holiday schedules vary depending upon your assigned contract site.

## ***Vacation / Paid Time Off (PTO)***

Eligible employees will be paid vacation pay in accordance with the applicable CBA or wage determination, terms of the Paragon vacation pay policy, applicable CBA or Wage Determination and applicable state and federal law.

If you have any questions regarding your eligibility for vacation pay, or need further information on the Company vacation policy, please contact your contract office.

## ***Sick Days***

Paragon provides up to 56 hours of sick leave to eligible employees on Federal contracts, or sick leave as provided in the applicable CBA.

# **RULES FOR PERSONAL CONDUCT**

When an individual accepts employment with Paragon, they are expected to conduct themselves with proper regard for the rights of others and of the Company. Our employees are expected to be a good corporate, as well as a private citizen. The following rules are provided to promote an understanding of company expectations for all Paragon employees.

Listed below are examples of major rule offenses for the Rules for Personal Conduct and the associated penalties. The list not all inclusive; these and other infractions will be evaluated on a case-by-case basis. Discipline will be administered in accordance with the Paragon Progressive Discipline Policy, where appropriate.

Major Rule Offenses – The following offenses are sufficiently serious that a proven violation may result in termination on the first offense, or an unpaid suspension if management believes the behavior can be corrected.

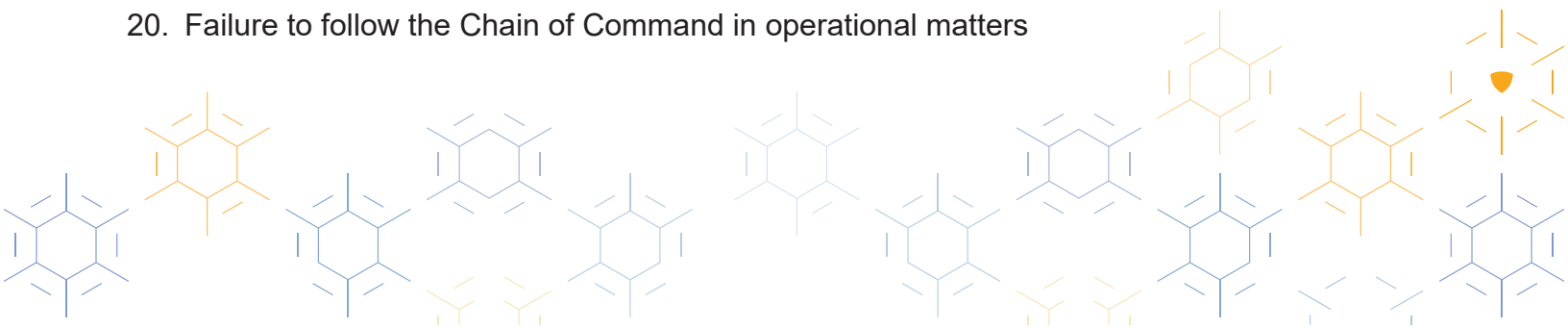
1. Disorderly conduct, use of abusive or offensive language, quarreling, threats and intimidation by words or action, assault, or participation in disruptive activities (including horseplay) which interfere with the efficient operations of the Company and client
2. Theft, vandalism, arson, sabotage, assault, or any other criminal action whether on or off duty
3. Sleeping, dozing or napping on duty
4. Neglect of duty; engaging in unauthorized personal or non-Company business while on post

5. Use or visible possession of electronic items on post, including but not limited to cell phones, tablets, laptops, gaming devices, Bluetooth earpieces, headphones, or any other unauthorized electronic device
6. Selling or being under the influence of intoxicants, drugs, or other substances (which produce similar effects) on Company or client property
7. Refusal to submit to drug or alcohol tests. (Suspension in lieu of termination is not permitted for this offense.)
8. Misuse of weapon(s), i.e. violating Company Weapons Policy
9. Possession of unauthorized weapons(s) or ammunition on Company or client property
10. Unauthorized use of client equipment
11. Falsification or unlawful concealment, removal, mutilation, or destruction of any official documents or records, or concealment of material facts by willful omissions from official documents or records to include timesheets and duty logs
12. Failure to cooperate in, or interference with, an official investigation; lacking candor in an official investigation
13. Making false statement(s) regarding Company business to any Company executive, site supervisor, or designated representative
14. Insubordination (including, without limitation, deliberate failure to carry out assigned tasks, refusal of a direct order, abusive language directed toward a supervisor, and similar conduct).
15. Leaving the premises of the property or facility to which they are assigned without being properly relieved or leaving prior to the end of a designated shift
16. Failure to provide notice within 12 hours to Paragon, or other appropriate official(s), of an arrest and/or conviction, except for minor traffic violations. (Any arrest will result in unpaid suspension, pending further investigation and/or final disposition of the cases.)
17. Misstatement or material omission in the employee's application for employment, without regard to the employee's length of service at the time the Company discovers the misstatement or material omission.
18. Engaging in sexual, racial, or other forms of harassment, discrimination, or hazing
19. Improper use of official authority or credentials including misrepresentation of titles or scope of authority
20. Lending or giving Company keys or access codes to unauthorized person
21. Revealing security information to any unauthorized persons
22. Being negligent or careless resulting in danger, damage, injury, or loss to an employee, the Company, or client
23. Having personal visitors, family members, or friends while on duty
24. Gambling or unlawfully betting or promoting gambling on Government owned or leased premises.
25. Solicitation of gifts favors or bribes in connection with official duties.
26. Being involved personally or in a business manner with persons known to be convicted of felonies or known to be involved with criminal activities
27. Failure to demonstrate the highest standards of integrity, personal and moral conduct expected from Security professionals.

28. Moving, disposing of, or altering any material on/in client desks. Opening or otherwise disturbing client drawers, cabinets or other areas not directly related to duties as a Security Officer.

Other Rule Offenses – May warrant suspension in the first instance, depending on the circumstances of the offense, or an oral or written reprimand.

1. Failure to report for duty unless a bona fide emergency occurs
2. Disparaging the Company's client, whether this occurs on or off Company property/time
3. Unauthorized items on post other than personal electronics; unauthorized eating, drinking, or chewing gum on post with the exception of the consumption of water by Officers conducting external security checks during hot weather conditions
4. Excessive absenteeism or Open Post as defined in the Absenteeism Policy
5. Failure to comply with established regulations concerning personal appearance and hygiene
6. Failure to pass on pertinent information to the relieving officer (s)
7. Failure to verbally report to the immediate supervisor all unusual incidents, including accidents or injuries, occurring while on duty
8. Failure to complete a written report of unusual incidents, including in a timely manner
9. Being tardy or overstaying relief or lunch period when such tardiness does not cause an Open Post
10. Unauthorized use of client's offices, telephones, computers, fax machines, typewriters, calculators, copy machines or any other equipment
11. Failure to report emergency use of client equipment in the daily report
12. Failure to maintain a professional bearing and a courteous attitude at all times while on duty
13. Failure to submit legible, complete, and accurate documents on time
14. Demonstrating incompetence or inefficiency
15. Unauthorized distribution of written or printed material of any kind in work areas or at any time during work hours on Company or client premises
16. Unauthorized solicitation of contributions, membership, or sales during work hours
17. Failure of an Officer to report any circumstances that may adversely affect the performance on a particular assignment to their immediate supervisor prior to assignment
18. Failure to report for duty physically fit and mentally alert or failure to provide a doctor's release allowing the Officer to perform all required job functions to their supervisor
19. Entertaining, socializing or entering into business arrangements with giving legal advice or granting special favors to client's employees, family members and friends of the aforementioned individuals
20. Failure to follow the Chain of Command in operational matters



# DISCIPLINE & TERMINATION

## *Voluntary Separation*

A separation is considered voluntary when you elect to resign. Whenever possible, you are requested to submit, in writing, the reason for resignation and your anticipated departure date.

If you are thinking of resigning, please talk it over with your supervisor and/or your contract management before doing so. If you do decide to leave, we would appreciate two weeks' notice.

## *Involuntary Separation / Layoff*

There are certain times when it may become necessary to lay off employees as a result of changing business conditions. Examples of these conditions include but are not limited to:

- Reduction in work force;
- Loss of client contract;
- Reorganization resulting in the elimination or modification of a job.
- Post Closures

When Paragon concludes that a layoff or reduction in force is necessary or appropriate, the positions and/or employees to be eliminated will be selected based on a number of factors, which may include demonstrated performance and skills, ability and reliability, and seniority.

## *Other Employer Initiated Separations*

When any employee fails to meet Paragon's and/or client's expectations, Paragon may end the employment relationship. Misconduct is not permitted in a security organization and generally will be cause for termination by Paragon.

Generally, employees who are unable or unwilling to meet performance, attendance and conduct expectations will be subject to discipline up to and including termination of employment.

# PROGRESSIVE DISCIPLINE POLICY

Paragon uses a progressive discipline policy for dealing with violation of work rules, instances of unacceptable behavior or misconduct, or continued poor performance by Paragon employees. "Progressive discipline" means that employees will normally be assessed penalties that increase each time an offense is repeated, or a performance improvement is not made. Of course, some offenses will be more serious than others; therefore, certain conduct may lead to more severe discipline on the first offense. Paragon reserves the right in all cases to implement the disciplinary action appropriate to the offense. Nothing in this section should be considered to restrict Paragon's authority to start the disciplinary action at suspension or termination, in an appropriate case.

## *Causes for Immediate Suspension*

Some types of misconduct may require immediate suspension while an investigation is conducted. These include but are not limited to: neglect of duty; appearance of sleeping, dozing, or napping; alleged post abandonment; causing a security breach; physical attacks, threats of violence, allegation of theft and allegation of harassment.

Some types of misconduct are so intolerable that they be punished by suspension or termination at the first occurrence. These include, but are not limited to: neglect of duty; sleeping, dozing, or napping on duty; causing a security breach; post abandonment; falsification of timesheets or other work documents; insubordination; refusal to cooperate in a Company investigation; drinking or use of drugs on duty; intoxication on duty; failure to report an arrest within 12 hours; evidence of substance abuse, physical attacks, and threats of violence, verification of history of violence, falsification of an employment application or other work documents or records, theft, or willful property damage.

Employees who commit egregious misconduct or serious safety violations may be suspended at the time of the incident, pending a management investigation and review of the matter. The discipline imposed can range from suspension to termination depending on the outcome of the investigation.

Some types of misconduct are so intolerable that they may be punished by termination at the first occurrence. These include, but are not limited to: post abandonment; sleeping, dozing, or napping on duty; falsification of timesheets or other work documents; drinking or use of drugs on duty; intoxication on duty; failure to report an arrest within 12 hours; physical attacks or threats of violence; refusal to submit to drug or alcohol tests; failure to pass a random drug test, verification of a history of violence, verification of threats of violence, verification of physical attacks, verification of theft, or verification of harassment.

## *Procedure*

Supervisors must obtain approval of disciplinary measures more severe than written reprimand from their supervisor or other appropriate management official, except in those cases where employees commit egregious acts warranting immediate removal.

Progressive discipline steps shall normally be initiated, approved, and presented to the employee within 7 working days of the incident (excluding Saturday, Sunday, or holidays), unless extenuating circumstances render that impracticable.

The Paragon progressive discipline procedure has four steps:

### **Step 1: Oral Reprimand**

The first step is the “Oral Reprimand”. This is an oral warning made when an employee’s conduct is unacceptable. The oral reprimand also makes clear that further infractions of any of the Rules for Personal Conduct may lead to more severe penalties. A notice of the oral reprimand will be noted on the Security Officer Counseling Form and placed in the employee’s personnel file.

In cases where the 1st violation is categorized as a major offense of the Rules for Personal Conduct, steps 1 and 2 of this procedure may be combined.

## **Step 2: Written Reprimand**

The second step is a “written reprimand” using the Security Officer Counseling Form. This reprimand will describe the unacceptable conduct or performance and specify the improvement needed. Further infractions of any of the Rules for Personal Conduct may lead to more severe penalties. A copy of this warning will be retained in the employee’s personnel file.

## **Step 3: Unpaid Suspension**

The third step is an unpaid suspension. The length of unpaid suspension for non-exempt employees will vary based on such factors as severity of the offense and the employee’s performance and disciplinary record. Employees may be suspended for repeated instances of minor offenses or for a single major offense. A record of the suspension will be retained in the employee’s personnel file.

## **Step 4: Termination**

Employees may be terminated, with approval of Senior Management, based on the outcome of an investigation.

## ***Appeals Procedure***

Employees not covered by a collective bargaining agreement who think they have been disciplined unfairly, too harshly, or inappropriately may appeal the discipline within five working days by filing a written appeal. All such appeals will be answered in writing.

Employees covered by a collective bargaining agreement shall pursue their appeal in accordance with the grievance procedure outlined by the Collective Bargaining Agreement.

## ***Outcome***

Following the appeal, workers who are found not culpable or otherwise cleared of charges pending against them will be reinstated with no loss of benefits or seniority.

You are required to return all Company property in your possession immediately upon termination of employment for any reason. This includes your handbook, weapon, uniform, and any keys, tools, equipment, or other manuals you have received. Failure to return the Company firearm or body armor will result in a report of stolen property to the local police or sheriff’s department.

## ***Final Wages***

Your final paycheck will be provided to you as required by applicable state law.

## ***Group Health Benefits & COBRA***

Your health benefits will terminate at the time of separation in accordance with that plan’s coverage contract. In most instances, you may continue basic health benefits under the Consolidated Omnibus Budget Reconciliation Act (COBRA). You will be advised of this option by Paragon Benefits Department after your local office has provided notice of your separation.



## **NOTES:**



13900 Lincoln Park Dr., Suite 300  
Herndon, VA 20171  
[www.parasys.com](http://www.parasys.com)