

STANDARDS OF CONDUCT

The mall, including its parking lot, is private property. In order to maximize the enjoyment, convenience, and safety of our guests, the following standards of conduct are set forth for the purpose of protecting the center's legitimate business interest. Any violation of the code interferes with the commercial nature and function of the center. As a visitor on this property, you are prohibited from engaging in any of the following activities while on this property.

Examples of such activities include, but are not limited to:

- · Carrying or possessing any weapons of any kind, including weapons carried pursuant to a valid license.
- Using physical force, obscene language, obscene gestures or racial, religious, ethnic slurs or comments
 that are in any way discriminatory in content which are likely to create a disturbance or impinge on the
 hearing or peace of other patrons of the center.
- Physically or verbally threatening any person, fighting, annoying others through noisy or boisterous activities
 or any unnecessary staring, by following another person through the center or by using sexually explicit
 language or conduct, or in any other way creating a disturbance which interferes, disrupts or endangers the
 center's patrons or its commercial function.
- Running, skating, skateboarding, bicycling, obstruction or interfering with the free flow of pedestrian traffic or
 with other patron's view of windows and other tenant displays, or assembly for the purpose of disturbing the
 public peace, or committing any unlawful act.
- Creating litter or throwing, discarding, or depositing any paper, glass or other matter of any kind on the property, except in designated trash receptacles.
- Defacing, damaging or destroying any real or personal property constituting part of, or located on, the center
 and belonging to the center, its patrons or its tenants, including writing, spraying, scratching or otherwise
 affixing graffiti on such property.
- Yelling, screaming, singing, playing of musical instruments, radios or tape players, or otherwise communicating in a manner which creates noise of sufficient volume to impinge on the hearing or peace of the other patrons of the center.
- · Bringing any non-service animals/pets onto the property.
- Engaging in non-commercial expressive activity without the prior written permission of the management of the center.
- Soliciting money or other contributions or donations, or distributing commercial advertising or promotional
 material of any kind, or offering samples of items which are sold, available for sale or available in exchange
 for a donation or contribution, except with prior written permission of the management of the center.
- Failing to be fully clothed, or wearing apparel which has obscene language, obscene gestures, or racial, religious or ethnic slurs, which are likely to create a disturbance.
- · Sitting on floors, planters, handrails, stairs, escalators or trash receptacles.
- Possessing any open can, bottle or other receptacle containing any alcoholic beverage, except in areas specifically designated for the consumption of alcohol.
- · Loitering, delaying, lingering or remaining idle about the exterior of the property.
- . Engaging in any unlawful activity or behavior or disrupting every day business activity.
- · Unauthorized scavenger hunts or unauthorized photography.
- · Any other behavior or activity that is perceived to be offensive to the general public.

Failure to comply with the standards of conduct or lawful or reasonable requests by Mall Management or Security may result in your loss of the privilege to use the mall and/or criminal prosecution, where applicable.



Operations Manual

Ohio Retail Security, LLC, 180 East Broad Street, Columbus OH 43215, Phone: 614.621.9000 Fax: 614.621.2010

OHIO RETAIL SECURITY, LLC

The purpose of this manual is to provide operational direction to Security Officer Associates employed by Ohio Retail Security, LLC, d/b/a California Retail Security, Inc. (California) and d/b/a Corporate Retail Security, LLC (Minnesota). Throughout this manual, these businesses will be referred to as ORS, for the sense of clarity. ORS is a subsidiary of Glimcher Realty Trust (also referred to as the "Company"), a leader in the ownership, management, acquisition and development of super-regional and regional malls located throughout the United States. This manual will provide guidance on how to conduct unarmed security operations in a shopping mall environment.

The goal of ORS is to provide a safe and secure environment through customer service oriented Security Officers. We are committed to providing excellent security services to our clients, tenants, customers, and visitors at our shopping mall locations. We believe this goal is attained through a proactive process of extensive training, safety and security awareness, threat reduction, crime prevention, technology, and environmental design. This requires a dedicated and knowledgeable security officer force, operating in compliance with clear and understandable policies. The policies in this manual, along with the information contained in the Glimcher Associate Guide, are the rules and regulations that guide us in our day to day operations. Should any situation arise that the associate needs clarification, these documents should be consulted. If the associate is still unclear on what they should do, their immediate supervisor should be notified.

The ORS Operations Manual will be constantly reviewed, with necessary immediate updates sent to all; otherwise, the latest version will be sent out in the first quarter of each calendar year.

Dennis L. Deskins Corporate Director of Security Glimcher Realty Trust

Revised 5/11/2009

OHIO RETAIL SECURITY, LLC

TABLE OF CONTENTS

CHAPTER	R 1: INTRODUCTION	5
1.1	ORS Philosophy	5
1.2	Security Officer Not a Police Officer	5
1.3	Overview of an ORS Officer	6
1.4	Liability	7
1.5	Relationship with Mall Management and Tenants	7
1.6	Training	8
СНАРТЕ	R 2: POLICIES AND PROCEDURES	9
2.1	Associate Guide	9
2.2	ORS Operations Manual Availability	9
2.3	Weapons	10
2.4	Daily Operations Chain of Command	11
2.5	Integrity	
2.6	Conduct (On and Off Duty)	
2.7	Use of Company Equipment and Vehicles	16
2.8	Confidentiality	17
2.9	Media Relations	17
2.10	Professional Appearance	18
2.11	Signing Documents	
СНАРТЕЯ	R 3: BASIC DUTIES	20
3.1	Attention to Duty	20
3.2	Patrolling the Property	20
3.3	Liaison with Mall Management	
3.4	Security Office	
3.5	Reporting for Duty	
3.6	Meal and Break Times	
3.7	Shift Change Procedures	22

ORS, LLC Operations Manual

(CHAI	PTER 4: INTERIOR PATROL	23
4	1 .1	Public Safety	23
4	1.2	Reporting Emergencies	24
4	1.3	Protection of Mall Property	24
4	1.4	Enforcement of Tenant Regulation	25
4	1.5	Fire Control Systems	27
4	1.6	Securing Facility	28
4	1.7	Night Watch Patrol	28
4	1.8	Night Entry	28
4	1.9	After Hours Mall Activities	
4	1.10	Special Events	30
4	1.11	Deliveries to Tenants	
4	1.12	Bank Depository	31
4	1.13	Solicitors	31
4	1.14	Construction Activities	
4	1.15	Access to Roof and Mechanical Areas	32
4	1.16	Trash, Spills and Safety Hazards	32
4	1.17	Public Lockers	32
CH A D'	TFD	5: EXTERIOR PATROL	33
		Patrol Vehicles	
_		Suspicious Activities	
-		Parking Areas	
		Traffic Crashes	
		Trash Compactors	
_		Roof Inspections	
_		Weather Watch	
_		Physical Condition of Structure	
_		Unauthorized Use of Property/Trespassing	
_			

ORS, LLC Operations Manual

CHAPTER	R 6: ASSISTANCE TO PATRONS	38
6.1	Criminal Activities	38
6.2	Incidents Involving Juveniles	38
6.3	Criminal Trespassing	39
6.4	Disturbances	40
6.5	Mall Walking	41
6.6	Personal Illness or Accidents	
6.7	Lost Persons	42
6.8	Lost Possessions	42
6.9	Patron Vehicle Assistance	43
6.10	Personal Escorts	43
6.11	Shoplifting and Other Retail Crimes	43
6.12	Emergency Telephone List	44
6.13	Tenant Intrusion Alarms	44
6.14	ORS Special Services	45
CHAPTER	7: COMMUNICATION TOOLS	46
7.1	Reports	46
7.2	Complaints	
7.3	Radio Procedure and Usage	48
7.4	Telephones	
7.5	Alarm Systems	
7.6	Closed Circuit Television Systems (CCTV)	50

Revised 5/11/09

- 4 -

CHAPTER 1: INTRODUCTION

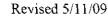
1.1 ORS Philosophy

- A. Our philosophy is to serve our customers by understanding and practicing proactive safety awareness and crime prevention through exceptional customer service and relations, thus reducing potential loss and liability.
- B. Security Officers are an extension of the mall management team, acting as ambassadors in dealing with our tenants and visitors.
- C. We must maintain a positive and receptive attitude with all persons we come into contact with.
- D. We must be vigilant in anticipating needs and potential situations where our services may be required.
- E. We must have a thorough knowledge of the property and the people who work at or visit the mall.
- F. We develop and maintain a positive professional relationship with the public safety forces including police, fire and EMS.
- G. We answer all calls for service as soon as possible, with a caring attitude and problem solving skills.
- H. We treat everyone equally and with dignity and respect.
- I. We never leave a person in need in a worse condition than what we found them.

1.2 Security Officer Not a Police Officer

- A. Security Officers should never confuse their role and function with that of a police officer, as they are different.
- B. Security Officers are private citizens, not sworn peace officers charged with the duty to provide law enforcement services to a governmental jurisdiction.
- C. Security officers have no special authority or privilege beyond any other citizen.

- 5 -



- D. Security officers are responsible for protecting Company property, preventing crime, positive public relations, and the safety of employees and visitors on mall property.
- E. We prefer to deter crime through high visibility by continuous patrol; however, if a crime occurs, our function is to notify the proper authorities, providing them with as much information as is obtainable.
- F. Officers do not detain or restrain a person's freedom of movement, either through verbal commands or actual physical control.
- G. Officers do not arrest or take control of a person in order to deliver them into legal custody. Instead, contact the police and await their arrival.
- H. Do not use physical force against anyone, unless you are protecting yourself or protecting the victim of an assault. Once the aggressor stops, you must also stop your use of force actions. In this situation, handcuffing is warranted to secure the aggressor while awaiting the police.

1.3 Overview of an ORS Officer

- A. Officers are well groomed and take pride in our appearance and uniform.
- B. Officers are ambassadors for the mall we serve, remaining available to assist anyone we come into contact with.
- C. Officers act as representatives of the mall management, its policies, and corporate personality. We are intelligent, capable, skilled, courteous and professional at all times.
- D. Officers, on occasion encounter behavior by individuals that is socially disruptive or criminal in nature. We do not detain, restrain, or use force to resolve conflict or disruptions. If we cannot bring the disruptive behavior under control, we politely ask the person(s) to leave our property. If they fail to comply, we notify the police. All <u>criminal activity</u> is reported to the police.
- E. Officers are not forced into unprofessional conduct or violate our policies and procedures through threat or challenge.

-6-

Revised 5/11/09

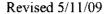
F. Officers are not expected to expose themselves to dangerous situations. Instead, be a good witness and notify the police when criminal acts occur.

1.4 Liability

- A. It is imperative that officers act within the policies described in this Operations Manual, as well as the Glimcher Associate Guide.
- B. Failure to act within these guidelines may also subject the officer to possible personal liability issues. If the officer chooses to act outside the scope of their authority, the company may have no obligation to represent the officer.
- C. These policies are specifically designed to provide guidelines, ensuring that all involved are protected.

1.5 Relationship with Mall Management and Tenants

- A. The Mall Management team is the landlord or managing agent of the shopping mall and each of the individual stores is a tenant who pays rent in order to occupy a space and conduct business.
- B. Tenant stores and their employers are bound by a contractual agreement commonly known as a "lease," which prescribes various rules and regulations with which they must comply in the course of doing business within the mall or mall property.
- C. Mall Management and tenants work together to achieve a common objective of continued customer patronage.
- D. Each tenant is responsible for security within their store. We may assist the tenants with problems in a limited way, according to our stated policies; however, the overall responsibility for each tenant's individual store security remains with the tenant. Officers do not go into the tenant stores without being invited by a tenant representative.
- E. If the officer receives a complaint from a customer on the tenant or its employees, the officer should refer the complaining person to the tenant store management. If the person persists, they should be referred to Mall Management.



- F. Officers are never authorized to accept responsibility for or watch a tenant store or space, so the employee can take a break or run an errand. If the officer is asked, they should politely decline. Officers should never accept the responsibility of watching a tenant employees' property such as keys, money, bags, or other items.
- G. Tenants who request mall services, such as maintenance or housekeeping, should be referred to the Mall office.

1.6 Training

- A. All new-hire officers receive 16-hour site specific and 24-hour on-the-job training within the first 30 days of employment.
- B. All training is documented through a 30-day training checklist and signed by the officer, Security Manager, and General Manager or Operations Director.
- C. All new-hire training information, along with required forms, is located in the ORS New-Hire Training Manual.
- D. Advanced training is offered and documented, based upon the need of the officer and Company.
- E. ORS adheres to any state required training for its officers.

Revised 5/11/09

-8-

CHAPTER 2: POLICIES AND PROCEDURES

2.1 Associate Guide

- A. The Glimcher Associate Guide has been prepared to assist all associates in better understanding our culture, along with providing a high level overview of the following:
 - 1) Employment
 - 2) Associate Communications
 - 3) Compensation and Payroll
 - 4) Time Away from Work
 - 5) Associate Benefits
 - 6) Standards of Conduct
- B. ORS employees are responsible for reading and adhering to the policies and procedures set forth in the Glimcher Associate Guide. Officers will have access through the mall computer system via the intranet or are given a hard copy from their immediate supervisor or Glimcher Human Resources. If a question exists, officers will contact their immediate supervisor for direction.

2.2 ORS Operations Manual Availability

- A. All officers are responsible for reading and adhering to the policies and procedures set forth in the ORS Operations Manual.
- B. Officers will have access, either through the mall computer system via the intranet or a copy kept in the Security Office at each mall location.
- C. As updates are received, all officers read and sign off on the new information. The sign off documentation is retained in the officer's training file at each mall location.
- Officers are also responsible for all policies and procedures disseminated by
 Mall Management, at each location. Officers read and sign off on these

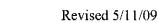
Revised 5/11/09

- 9 -

- documents. The sign off documentation is retained in the officer's training file at each mall location.
- E. It is the ultimate responsibility of the Security Manager (or person designated by the General Manager of each mall location) to ensure all officers read, adhere to, and sign off on policy and procedure updates.
- F. All information contained in the Operations Manual is confidential and not to be released in any form to anyone without the direct and specific approval of the Corporate Director of Security.
- G. The ORS Operations Manual will be reviewed as needed and updates sent out to all mall locations. An annual review and update typically will take place by the end of the first quarter each calendar year.

2.3 Weapons

- A. ORS provides unarmed security services. Whether on or off duty, while in the mall or on mall property, officers are not authorized to carry or use any firearms, knives, disabling chemical agents, stun guns, baton, or anything else that has not been issued by ORS in the mall. There are no exceptions.
- B. If officers, in their daily activities, discover a firearm in the mall or outside property, the police should be called immediately. The officer will secure the location and await police arrival.
- C. If any other weapons (non-firearm) are found on mall property, officers should photograph the weapon at the location found, secure the weapon, and then transport it to the Security Office. If there is a possibility the weapon was used in a crime, the police should be notified.
- D. If officers observe or are advised that a person in the mall is carrying a firearm or other deadly weapon, the police should immediately be notified. While awaiting police arrival, officers should attempt to maintain surveillance on the suspect, either in person or through the mall closed circuit camera system, but should immediately stop if it places the officer or some other innocent person at risk.



2.4 Daily Operations Chain of Command

- A. The Daily Operations Chain of Command is not a substitute for the Glimcher Open Door Policy. Glimcher encourages open and constructive communication between all associates. For more information on the Open Door Policy, refer to the Glimcher Associate Guide.
- B. To avoid confusion and promote efficiency and responsibility, the chain of command is adhered to. Each employee seeks direction from the next higher rank.
- C. Based upon the size of the mall, sometimes different ranks and responsibilities exist. The following is an <u>overview</u> of the job descriptions of key security associates at each mall.

1) Security Manager

- Hires, trains, schedules, evaluates and directs security associates while maintaining required records and documentation
- Makes scheduled tours of the mall and grounds by vehicle or walking to ensure security, and watches for conditions that could result in injury or loss due to theft, vandalism, fire, water leakage, spills, etc.
- Liaison with public safety officials including police, fire and EMS.
- Liaison with tenants and guests.
- Reports to Operations Director/ General Manager and/or public safety authorities any unusual or suspicious condition detected., i.e., presence of weapons, bomb threats, etc.
- Responds to assault calls, notifies police, and obtains medical help, if necessary.
- Prepares reports for Operations Director and General Manager.
- Performs safety/fire checks both for the interior and exterior, reporting any problems or concerns to the Operations Director or General Manager.
- Monitors parking control including employee parking, issuance of warning tickets, and handicap parking.
- Maintains fire and evacuation plan.

Revised 5/11/09

- 11 -

- Investigates reported thefts and vandalism, recommends various security measure to deter such activity.
- Performs background checks on applicants ensuring they meet state licensing requirements.
- Maintains control of assigned mall keys.
- Reviews daily reports filed by officers ensuring that all reports are accurate, and filed timely.
- Responsible for crowd control during promotional events.
- Responds to power failure, silences the alarm system, makes sure the generator is working, and ensure that customers are in a safe area.
- Performs monthly audits of the petty cash, lottery, and temporary tenant income.
- Takes statements, and writes detailed reports.
- Responsible for vehicle fleet and all assigned equipment inventory and maintenance.
- Reports any vehicle or equipment damage or malfunction immediately to the Operations Director or General Manager.
- Ensures timely compliance with training and state licensing requirements for officers.
- Maintains current ORS Operations Manual informing all officers of any updates or changes in policies or procedures.
- Performs other assignments as directed.

2) Assistant Security Manager

Assists the Security Manager in daily operations and is responsible in his/her absense for the following:

- Hires, trains, schedules, evaluates and directs security associates while maintaining required records and documentation.
- Makes scheduled tours of the mall and grounds by vehicle or walking to ensure security, and watches for conditions that could result in injury or loss due to theft, vandalism, fire, water leakage, spills, etc.
- Liaison with public safety officials including police, fire and EMS.
- Liaison with tenants and guests.

Revised 5/11/09

- 12 -

- Reports to Operations Director/ General Manager and/or public safety authorities any unusual or suspicious condition detected., i.e., presence of weapons, bomb threats, etc.
- Responds to assault calls, notifies police, and obtains medical help, if necessary.
- Prepares reports for Operations Director and General Manager.
- Performs safety/fire checks both for the interior and exterior, reporting any problems or concerns to the Operations Director or General Manager.
- Monitors parking control including employee parking, issuance of warning tickets, and handicap parking.
- Maintains fire and evacuation plan.
- Investigates reported thefts and vandalism, recommends various security measure to deter such activity.
- Performs background checks on applicants ensuring they meet state licensing requirements.
- Maintains control of assigned mall keys.
- Reviews daily reports filed by officers ensuring that all reports are accurate, and filed timely.
- Responsible for crowd control during promotional events.
- Responds to power failure, silences the alarm system, makes sure the generator is working, and ensure that customers are in a safe area.
- Performs monthly audits of the petty cash, lottery, and temporary tenant income.
- Takes statements, and writes detailed reports.
- Responsible for vehicle fleet and all assigned equipment inventory and maintenance.
- Reports any vehicle or equipment damage or malfunction immediately to the Operations Director or General Manager.
- Ensures timely compliance with training and state licensing requirements for officers.
- Maintains current ORS Operations Manual informing all officers of any updates or changes in policies or procedures.
- Performs other assignments as directed.

3) Security Shift Supervisor

- Ensures that security officers on his/her shift are following all policy and procedures.
- Ensures that all security personnel are present and accounted for at the beginning and during their shift.
- Ensures that all alarms and camera systems are in working order if applicable.
- Ensures that mall exterior doors are operational and can be secured as well as roof hatches.
- Ensures that interior and exterior lighting is adequate for security.
- If applicable, ensures that a nightly parking lot light check is conducted and reports the findings.
- Monitors parking control including employee parking, issuance of warning tickets, handicap and fire lane parking.
- Ensures that the officers of their assigned shift knows the fire and evacuation plan.
- Ensures that officers are trained on what to do when a crime is reported.
- Ensures security officers are trained and know entry and after hours permit policy.
- Ensures security officers are aware of possible hazards and take immediate actions to remove them or secure the area for public safety officials.
- Stresses safety procedures with employees.
- Ensures that if requested escorts are provided to tenant/customers.
- Ensures that fund escort is provided to and from guest services.
- Ensures all mall hourly employees follow all mall rules and regulations.
- Ensures all mall tenants follow all mall rules and regulations.
- Ensures all equipment is signed out at the beginning of each shift and turned in at the end of each shift.
- Maintains the security vehicle log to ensure security officers are checking all the required items on the vehicle check list at the beginning of each shift.

Revised 5/11/09

- 14 -

- Checks all daily activity reports, incident reports, and injury reports for completeness by the end of the shift.
- Ensures that a security officer conducts a joint inventory on all lost items and all found items.
- Performs other assignments as directed.

4) Security Officer

- Patrols the mall interior and exterior property by vehicle or walking, remaining alert to provide a safe and secure environment.
- Monitors alarms and camera systems if applicable.
- Liaison with public safety officials including police, fire and EMS.
- Liaison with tenants and guests providing assistance when needed.
- Responds to calls for service taking appropriate action including incident reporting and notifications.
- Performs safety and fire checks during tour of duty.
- Monitors parking control including employee parking, issuance of warning tickets, handicap and fire lane parking.
- Takes statements and writes detailed reports when required.
- Provides escorts when requested.
- Performs other assignments as directed.
- D. Based upon size, some malls have the Mall Services Manager assume the duties of Security Manager.
- F. Officers will follow all reasonable instructions issued to them, either directly or indirectly, by either ORS Management or Mall Management. Instructions are deemed reasonable unless the following apply:

- 15 -

- 1) The instruction is illegal.
- 2) The instruction is immoral.
- 3) The instruction is unethical.

Revised 5/11/09

- F. If the officer receives instruction that they believe is unreasonable, they must immediately notify their supervisor. If the issue remains unresolved, they must notify the operational chain of command.
- G. Failure to obey an instruction may be deemed insubordination, and the officer may be disciplined within the guidelines of the ORS Operations Manual and Glimcher Associate Guide.

2.5 Integrity

- A. Officers should not commit any action that may raise a question regarding their individual integrity or honesty. Officers must be truthful at all times.
- B. All reports and testimony must contain honest and factual information. Exaggerations or untruthfulness is prohibited.

2.6 Conduct (On and Off Duty)

- A. Officers should not violate Federal, State or Municipal Laws. Violation of laws could result in disciplinary action up to and including termination.
- B. Officers adhere to the policies and procedures described in the ORS Operations Manual and Glimcher Associate Guide.
- C. Officers should be courteous, friendly, and helpful to all persons they come into contact with.
- D. Officers should remain aware that their off duty conduct may reflect on their employment at the mall.
- E. Officers should never do personal shopping or conduct personal business while in uniform at the mall.
- F. Officers should avoid becoming involved in incidents or other security issues while off duty and out of uniform.

2.7 Use of Company Equipment and Vehicles

A. Officers are assigned and have access to a variety of Company equipment and vehicles in order to accomplish their assigned duties. Officers should

Revised 5/11/09

- 16 -

- treat with care any and all Company equipment and vehicles entrusted to them.
- B. Personal, non-business use of any Company equipment or vehicle is prohibited.
- C. Officers will not take Company equipment or vehicles off mall property without prior approval.
- Mall telephones and computers are not to be used for personal business or pleasure.
- E. Negligent actions that cause Company equipment or vehicles to be damaged or destroyed may result in the officer being held financially responsible for its repair or replacement.

2.8 Confidentiality

- A. Information regarding the mall, its employees, customers, tenants, and business associates is confidential. If inquiries occur, the person should be referred to the Mall Management.
- B. Law enforcement officers seeking information should be referred to the Security Manager who may approve and delegate the task.
- C. Information regarding leasing, sales reports, associate data, crime statistics, officer deployment or any other specific information regarding Security is restricted. Officers should notify their immediate supervisor when inquiries are made.
- D. Participation in gossip or rumor is prohibited.

2.9 Media Relations

- All media inquiries should be directed to the Mall Management.
- B. If media representatives enter the mall, they should be immediately escorted to the Mall Management office.
- C. If media representatives come onto the property, the immediate supervisor should be notified, along with Mall Management.



Revised 5/11/09

- 17 -

D. There should be no media activity, including filming or interviewing, within the mall or on mall property, without prior permission being granted by the Mall Management.

2.10 Professional Appearance

- A. In addition to the appearance standards set forth in the Glimcher Associate Guide, the following grooming standards will apply to officers while in uniform:
 - 1) Mustaches, beards and goatees must be neatly trimmed.
 - 2) Tattoos and body piercing (other than earrings) should be concealed from view while in uniform.
 - 3) Side burns must be trimmed and not extend below the ear lobe.
 - 4) Hair must be neat, clean, well groomed and properly trimmed so not to create a safety issue for the officer.
 - 5) Exceptions may be granted based upon a Medical Doctor's written statement and authorized by the Mall General Manager.
- B. Only issued uniform clothing and equipment will be worn by officers. Exceptions must be approved by the Company.
- C. The security badge must be displayed on the outer garment, in the tab over the left pocket.
- D. The nameplate will be worn over the right pocket.
- E. Issued rank insignia will be worn by supervisors based on normal military uniform protocol.
- F. The authorized patch, including proper rocker, will be worn on the left sleeve of all authorized uniform shirts, sweaters, and jackets. An American flag patch will be worn on the right side. The patches will be approximately 1 inch from the top shoulder seam. Further instruction will be provided by the Security Manager.

Revised 5/11/09

- 18 -

- G. An American flag pin may be worn on the uniform, one inch above the officer's nameplate.
- H. Full time officers are issued 3 uniform shirts and 2 uniform trousers.
- I. Part time officers are issued 2 uniform shirts and 2 uniform trousers.
- J. Ties must be worn with long sleeve uniforms or if wearing the uniform jacket or windbreaker.
- K. Uniform jackets or windbreakers will not be worn on interior patrol.
- L. Officers must provide their own black socks and black shoes capable of being shined and meet requirements of security officer duties.
- M. Officers must provide their own white (no lettering) crew necked t-shirt to be worn under the uniform shirt.
- N. If any part of the issued uniform or equipment becomes worn, stained, or in an unsatisfactory condition, the immediate supervisor should be contacted. Officers are responsible for maintaining the issued uniforms and equipment in a clean, good working order.
- O. Prior to each shift, the supervisor on duty checks the officers ensuring they look professional.

2.11 Signing Documents

- A. Officers should not place their signature on any non-ORS forms, invoices, reports, statements, or any other documents related to <u>mall business</u> without approval of the Security Manager.
- B. Officers should not accept delivery or hold any type of package, unless it is for ORS; otherwise, the delivery person should be directed to the proper recipient or their representative.



- 19 -

CHAPTER 3: BASIC DUTIES

3.1 Attention to Duty

- A. Officers should give their full and complete attention to their duties.
- B. Officers should not give the appearance of being inactive or inattentive to their surroundings.
- C. Actions of sleeping on duty, leaving an assignment without approval, or neglect of duty are prohibited and may result in disciplinary actions up to and including termination.

3.2 Patrolling the Property

- A. One of the most important duties of officers is patrolling the property. Both interior and exterior patrols are necessary for high visibility and to deter criminal actions.
- B. While on patrol, the officer must be prepared to offer assistance to those in need.
- C. Officers while patrolling look for fire or water damage, disturbances, intruders, thieves, vandals, and safety issues.
- D. Officers respond to calls for service as quickly as possible. Once there, they assess the situation, offer assistance, or summon appropriate professionals that may be needed.
- E. Officers should be knowledgeable of the specifics of the property, including layout, store locations, and office locations.
- F. Officers should be familiar with the specific types of patrols that are needed at their mall, based on assignments by the operational chain of command.
- G. Officers maintain constant communication with the control center and each other while on patrol.

3.3 Liaison with Mall Management

A. Security services are provided with guidelines set forth through the Mall Management, along with the ORS Operations Manual.



Revised 5/11/09

- 20 -

- B. Any orders or guidelines issued by the Mall Management should be followed by officers. If questions arise, seek guidance from the immediate supervisor or operational chain of command.
- C. Officers treat Mall Management and employees with courtesy and respect at all times.

3.4 Security Office

- A. At each mall, the security office is the main location for all security operations.
- B. The security office is a reflection of the professionalism of the assigned officers. It should be used for business purposes and not become a social gathering location. The office should be kept neat and clean at all times.
- C. All equipment stored in the office should be maintained in an organized manner.

3.5 Reporting for Duty

- A. Officers are to report for duty on time, and be clean, well groomed and dressed in assigned uniform.
- B. Prior to starting assigned daily duties, the officer should do the following:
 - 1) Clock in for duty using the prescribed method at the mall.
 - 2) Inform supervision of your presence.
 - Sign for required equipment to perform the assigned duties. Note the condition of the equipment when received.
 - 4) Review pass-on information or receive a briefing from the immediate supervisor, operational chain of command, or Mall Management.
 - 5) Obtain shift assignment and duties for the day. Know how many other officers are on duty and their assigned locations.
 - 6) Report to the assigned duty post, advising the dispatcher or supervisor that you are there.
- C. Officers should park their personal vehicles in the area designated by the operational chain of command or Mall Management.

Revised 5/11/09

3.6 Meal and Break Times

- A. Officers should follow the meal and break schedule assigned by the Security Manager.
- B. Prior to going on break, other officers and the duty supervisor should be notified.
- C. Breaks must be taken in designated security break areas. Officers should not take breaks in the food court or common areas of the mall.
- D. During breaks, officers should remain on property and maintain radio contact at all times.
- E. Breaks should be scheduled at different times in order to maintain constant maximum patrol.

3.7 Shift Change Procedures

- A. Officers are to remain on active duty patrol until properly relieved at the scheduled shift change time, or at the consent of the operational chain of command.
- B. Prior to departing, the officer should do the following:
 - Submit all necessary paperwork for the shift based on established protocol.
 - 2) Make sure the relief officer has arrived on time. If not, the supervisor on duty should immediately be notified.
 - 3) All operational equipment for the day should be passed on or appropriately secured in the designated locations. Officers should note the condition of the equipment, and report any problems to the supervisor on duty.
 - 4) Make sure all necessary information and pass-on for the completed shift is available for the relieving officer.
 - 5) Make sure the supervisor on duty is aware of the shift change.
 - 6) Clock out of service, using the prescribed method of the mall.

Revised 5/11/09

- 22 -

CHAPTER 4: INTERIOR PATROL

4.1 Public Safety

- A. The officers primary responsibility while on interior patrol assignments is to patrol the mall common areas, service corridors, utility rooms, restrooms, and service bays, ensuring all persons adhere to the <u>Standards of Conduct</u> posted at each mall.
- B. Officers should be alert and watch for any potential liability problems, security issues, maintenance or engineering problems, tenant rule violations, or mall policy violations. If problems exist, the appropriate persons should be notified.
- C. For the safety of all, everyone must abide by acceptable rules of behavior in the mall. Any actions considered illegal, disruptive, dangerous, or offensive should be politely and professionally addressed by the officer.
- D. Due to public health codes, shirts and shoes are required when entering the mall. Visitors not in compliance should be politely informed and asked to leave the mall if they cannot or refuse to correct the violation.
- E. Certain boisterous activities are not permitted in the mall. Examples may include running, playing, sitting on planters, blocking foot traffic or playing on escalators. These actions should politely be addressed by the officer.
- F. Roller skating, skate boarding, and bicycle riding is not permitted in the mall.
- G. Playing of loud music or musical instruments without permission of Mall Management is not permitted. Also, screaming, yelling, or other excessive noise that disrupts others is not permitted.
- H. Visitors should not enter into unauthorized areas of the mall, such as back corridors, service elevators, empty tenant spaces, or other non-customer areas. Officers should help redirect those who have entered these areas.
- Abusive or obscene language is not permitted. If this exists, the officer should politely advise the violator. If they refuse to refrain from such actions, they should be asked to leave.



Revised 5/11/09

- 23 -

- J. Alcohol consumption is permitted only in legally designated areas such as restaurants or food court, by persons of legal age. It is not permitted in common areas of the mall.
- K. Visitors are not permitted to congregate in such large crowds that it impedes or hinders the safe flow of foot traffic, creating a hazard.
- L. Any unlawful activities are reported to the police.

4.2 Reporting Emergencies

- A. If the officer observes or is informed of an occurrence or circumstance that presents a serious and immediate threat to persons or property, aid should be immediately summoned. The aid could be from additional security officers, Mall Management, or public safety officers such as police and fire.
- B. Officers should remain calm and summon assistance with their radio. They need to state the nature of the problem, the exact location, and type of assistance needed.
- C. Radio traffic should be calm, precise and professional. Yelling and screaming into the radio or at others helps no one.
- D. As others respond, the officer needs to aid as much as they can, in compliance with the prescribed policies. At no time are officers required to place themselves in harm's way.

4.3 Protection of Mall Property

- A. Officers are responsible for protecting mall property and promptly reporting any damage or malfunction. Photos should be taken as soon as is practicable, along with an incident report.
- B. If the officer observes an act of criminal damaging or vandalism, they should immediately notify the supervisor or operational chain of command. A request should be made for the perpetrator to accompany the officer to the security office so information may be obtained. If the perpetrator refuses, the police should immediately be contacted. The officer should attempt to observe the person until the police arrive.

Revised 5/11/09

- 24 -

- C. In cases of property destruction, restitution is preferred and should be handled by Mall Management. The decision to file criminal charges will be made by the Mall Management.
- D. If the officer observes any building condition or situation that represents a public safety hazard or potential threat to mall security, the operational chain of command should be notified.

4.4 Enforcement of Tenant Regulation

- A. In the interest of continued good business and customer patronage, the Mall Management has developed various rules of operation for the tenants. Though most rules are standard, each mall may have some unique differences and the officer should be familiar with them.
- B. If the officer observes a violation of the tenant regulations, they should make note on their activity log, and notify the operational chain of command and Mall Management.
- C. Officers should not confront the tenant or any of their employees about the violation.
- D. The following are some of the typical situations that the officer may encounter. There may be exceptions or exclusions to these made my Mall Management, and the officer should be aware of the tenant regulations at the mall they serve.
 - 1) Receipt of Shipments: Tenants should not receive shipments of merchandise or fixtures through the regular customer entrances to the mall. These deliveries should be made through designated truck courts and service corridors. If the tenant has no direct access to the service corridor, then deliveries should be received from the nearest mall service corridor door to the front of the store. Delivery carts and hand trucks should have soft rubber or wheels that will not damage the mall flooring.

Revised 5/11/09

- 25 -

- 2) Disposition of trash: Tenants should take refuse from their store to the nearest trash compactor. Tenants should not leave trash in service corridors, truck courts, or other common areas. Tenants should not place trash in containers designated for customer use.
- 3) Loud noise: Tenants should conduct their business so no loud noises emanate from the premises into the common area. Strobe lights and other flashing lights are prohibited.
- 4) Lease line: Tenants are required to limit their business activities to the space they have leased. If they go past their leased area, they are in violation.
- Solicitation: Tenants are not permitted to solicit business outside of the leased premises, in the mall common areas, or parking lot.
- 6) Store hours: Tenants should be open for business during the regular mall hours established by Mall Management. Any late tenant openings or early closings should be reported.
- 7) Employee parking: Tenants should park in the designated areas for their store. They should not park in service bays by store back entrances, except for sufficient time to make a delivery.
- 8) Vacating Premises: Tenants should not vacate or abandon their leased premises without prior notification to Mall Management. If an officer suspects or verifies that a tenant is vacating the premises, Mall Management should be immediately notified.
- 9) Unattended Stores: Tenants should never leave a store unattended. Officers are not permitted to watch a tenant store for any reason.
- 10) After Hours: Tenants needing access to the mall after hours should have prior approval from Mall Management.

- 11) Unauthorized Displays: Hand lettered signs, signs taped to store windows, and displays extending beyond the lease lines are prohibited.
- 12) Unauthorized Access: Tenants and their contractors must secure permission from Mall Management prior to entering and upon leaving the roof areas or utility service rooms. Gaining access to roof areas require a sign in by the Officer after approval of Mall Management.
- 13) Cleaning of Tenant Space: Tenants are responsible for maintaining their own space. If the officer notices the store is not clean and it affects the overall look of the mall or the safety of customers, Mall Management should be notified.
- 14) Window Cleaning: Tenants are not permitted to clean windows during mall operating hours.

4.5 Fire Control Systems

- A. Fire alarms and "sprinkler" systems ensure prompt notification in the event of a fire.
- B. Officers must be familiar with the system procedures and operation at their assigned mall.
- C. Officers should never assume an alarm is false. Proper protocol must be followed in each alarm situation, as is described in the site specific response plans.
- D. The operational chain of command is immediately notified on any alarm occurrence.
- E. During routine patrol, officers should constantly be aware of any odors or fire hazards. If a hazardous condition is discovered, notifications should be made and the hazardous condition alleviated.
- F. Officers should routinely check the security and operating status of components of the systems, including valve rooms, sprinkler controls, and water pressure gauges.

G. Other fire control apparatus should be regularly checked, including extinguishers, fire hoses, and standpipes. The officer should immediately report any problems to the operational chain of command.

4.6 Securing Facility

A. Security officers are responsible for ensuring the common mall entrances and truck courts are locked and unlocked at the times prescribed by Mall Management.

4.7 Night Watch Patrol

- A. When the mall is closed and has been locked, the officers on duty are responsible to be alert for any unusual or suspicious activities or circumstances. They are to conduct patrols based upon the mall site specific instructions they have received from Mall Management and/or the Security Manager.
- B. Officers may investigate, but not to the point that they place themselves in a dangerous situation. If a dangerous situation occurs, officers should notify the appropriate persons based upon the occurrence. This may include the police, fire, operational chain of command, or Mall Management.
- C. Officers should treat with caution any doors found unlocked or open, especially if secure on previous checks. Officers should contact the supervisor on duty, and if necessary, contact the police if no explanation is quickly discovered.

4.8 Night Entry

- A. In addition to regular patrol of the common areas and service corridors during non-business hours, officers are responsible for controlling all after hours entrance and exit from the mall.
- B. Officers will maintain a log of persons entering and exiting the mall after hours.

- C. Authorized tenant employees that have approval of Mall Management are given access to their store anytime, after providing proper identification and complying with the mall's established night entry procedure.
- D. All mall personnel are required to log in and out when entering or exiting the mall during after hours.
- E. The log will enable the officers to notify everyone, in case of an emergency during the after hours, when the mall is closed.
- F. Tenant employees should notify security or Mall Management if they plan to stay substantially past the normal closing time. Officers should remain aware, especially if the store has outside access.
- G. Officers should request identification from anyone found inside the mall during after hours without authorization. If the persons are suspicious, uncooperative, or obviously involved in criminal activity, the police should be notified, along with the operational chain of command.

4.9 After Hours Mall Activities

- A. In some malls, businesses may be open beyond normal mall hours. Examples include restaurants, movie theaters, health clubs, and other entertainment facilities. Usually, these businesses will have an outside access point. If they do not, officers must be aware that patrons may attempt to enter unauthorized areas in the mall.
- B. In most cases, arrangements have been made with Mall Management; if not, officers should report these situations to the operational chain of command. Officers should politely guide the patrons in unauthorized areas to the correct areas where they are permitted access.
- C. When locking the mall, officers must be aware to look for patrons who have not yet exited. When found, they should be guided to the nearest exit. Officers should attempt to accommodate patrons to exit through the doors closest to their vehicle or awaiting ride in the parking lot.

4.10 Special Events

- A. Mall Management sometimes will schedule promotions such as shows, displays, demonstrations and celebrity visits. In most malls, this is organized by the Marketing Director. Security should liaise with all involved to ensure a successful promotion.
- B. Many times, special accommodations regarding locking and unlocking doors, set up and take down of equipment, and other details must be addressed. Officers should seek direction from the supervisor on duty if a promotion occurs and they have received no prior instruction.
- C. The officer is responsible to keep walkways, staircases and other lanes of egress open. They should also act as hosts to visitors, and help in whatever way possible within the scope of the ORS Operations Manual. This will aid in a successful promotion.
- D. Any questions or problems involving the promotion should be directed to the assigned representative from Mall Management.

4.11 Deliveries to Tenants

- A. Deliveries to tenants should be made through service courts and loading dock areas. In some situations, deliveries are made after business hours. Officers should be alert for such deliveries and contacted upon arrival. The officer should verify the delivery with the tenant prior to escorting the delivery person to the store.
- B. No delivery person should be allowed access to a tenant store or space after hours without the tenant's authorization or accompanied by a tenant representative.
- C. Officers do not sign for or accept any merchandise or other materials on behalf of tenants.
- D. Mall Management may request correspondence or other materials be delivered to tenants. When making the delivery, officers should seek out a representative from the tenant management and have them sign for the

delivery if requested by Mall Management. These errands for Mall Management should be noted on the Daily Log by the officer.

4.12 Bank Depository

- A. If the mall has a bank depository or ATM machines, they should be monitored regularly by officers.
- B. Any persons seen loitering or other suspicious activity should be reported to the operational chain of command immediately.

4.13 Solicitors

- A. Verbal solicitation, demonstration or distribution of handbills on mall property, whether inside or outside, is prohibited, unless permission has been granted by Mall Management.
- B. Violators should be politely asked to desist. If the violators refuse, they should be asked to leave the property. If they fail to comply, the operational chain of command and Mall Management should be notified and decide whether to contact the police.
- C. Those seeking permission should be referred to Mall Management.

4.14 Construction Activities

- A. Officers monitor construction activities in the mall looking for any criminal activity or safety issues.
- B. If safety issues are discovered, the operational chain of command and Mall Management should be notified.
- C. Appropriate signage should be displayed to warn of the construction areas. If proper signage is not being used, officers should notify the supervisor on duty and Mall Management.
- D. Officers should be aware of any large deliveries that may require special attention. If there are any questions, they should seek direction from the supervisor on duty.

4.15 Access to Roof Mechanical Areas

- A. Any utility or contractor employee must first obtain permission from Mall Management to gain access to the roof and mechanical areas.
- B. Upon gaining permission, the officer may give access. When work is completed, the officer should make sure there are no safety hazards present and access is properly secured.

4.16 Trash, Spills and Safety Hazards

- A. During patrol, officers should be alert to any conditions that could be a safety hazard, or cause the mall to look less than professional. Examples of such conditions include burned out light bulbs, spilled trash, slippery floors or any other situation that requires immediate attention. When discovered, the officer should notify the appropriate persons, which may include maintenance or housekeeping associates. It may be necessary to block off the area to control access, until the condition has been corrected.
- B. If the condition is not remedied in a timely manner, the supervisor on duty should be notified.

4.17 Public Lockers

- A. If the mall is equipped with coin-operated public lockers, officers should monitor the operation and integrity of these units during their patrol. Any damage or malfunction should be noted on the daily log and reported to the Mall Management.
- B. Customers who have lost money or experience other problems with the lockers should be referred to Mall Management or the persons delegated.
- C. Public lockers are checked nightly for unclaimed articles. Articles found should be treated as "lost and found" items and the mall protocol followed.

CHAPTER 5: EXTERIOR PATROL

5.1 Patrol Vehicles

- A. Before beginning a shift, officers should inspect the assigned patrol vehicles, looking for any defects, damage, or unusual conditions. If discovered, the supervisor on duty should be immediately notified and will determine if the vehicle is able to be used.
- B. When the vehicles are not being used, they should be parked in a safe place and the vehicle secured. Keys should never be left in an unattended vehicle.
- C. If an officer is involved in a crash, sustains damage, or a patrol vehicle malfunctions, the immediate supervisor should be notified and a report filed concerning the circumstances should be prepared. If the vehicle is involved in a traffic crash, a police report should be filed, based upon the appropriate state statutes. If it is determined the officer was negligent or intentionally caused the damage, they may be disciplined and/or financially responsible for repairs.
- D. When using the vehicles, officers should always drive in a courteous manner. No reckless or erratic driving will be tolerated.
- E. When driving, all municipal ordinances, state statutes, and mall rules will be followed. Officers should always be mindful of weather, road conditions, other vehicle and pedestrian traffic. Speed limits will be followed at all times.
- F. To enhance visibility, all strobe lights and running lights will be illuminated whenever the vehicle is being driven or in use.
- G. The patrol vehicles are not to be used as a pursuit vehicle. Officers are not to engage in a high speed pursuit. There are no exceptions.
- H. Vehicles are not to be taken off property without approval of the operational chain of command.
- I. The vehicles are to remain clean and professional at all times.
- J. When gas powered vehicles reach less than ¼ tank of gasoline, they should be refueled as soon as possible.

- K. Electric vehicles should be charged as soon as possible when batteries become low, in order to maintain fleet availability.
- No food or beverages should be consumed in the vehicles during operation.
 Smoking and tobacco usage in vehicles is prohibited.
- M. Officers should frequently change their patrol patterns, being consistently inconsistent.
- N. Non -security associates are not permitted to ride in a security vehicle, unless prior approval is granted by the Security Manager. Exceptions include assisting customers who are lost or looking for their vehicle.

5.2 Suspicious Activities

- A. While on patrol, officers should be aware and alert for any of the following:
 - Persons driving or wandering the parking lot without apparent purpose or acting suspicious.
 - 2) Vehicles parked for extended periods of time with occupants, especially in secluded areas.
 - Persons tampering with vehicles, or looking into windows of unoccupied vehicles.
 - 4) Persons who appear to need assistance.
- B. When suspicious activity is discovered, officers should advise other officers, and continue the surveillance. If the activity becomes criminal, the police should be notified, and the officer continues to observe and obtain any pertinent information, such as license numbers and descriptions. At no time is the officer required to place themselves in harm's way or confront the suspicious persons.
- C. If an officer approaches a person, they should remain at a safe distance and ask if the person needs help.
- D. Officers may ask for identification, but do not have the authority to demand it. If the person refuses to show identification, the officer should record

- pertinent descriptive information and remain a good witness if a crime occurs and the police become involved.
- E. All criminal activity, including theft from a vehicle, theft of a vehicle, and vandalism is reported to the police.

5.3 Parking Areas

- A. If the officer observes a person parking in a restricted area, such as fire lanes, handicapped parking spaces, loading zones, service courts, or truck courts, they may politely ask the violator to move, advising them they are in a restricted area. If the person refuses, and the parking is in violation of the law, the police should be notified for enforcement. If the violation is not against the law, but violates mall policy, Mall Management should be notified.
- B. Employee parking areas should receive extra attention, as the vehicles are usually parked for long periods of time and more susceptible to theft offenses.
- C. If the mall has assigned parking areas for employees, and the officer observes an employee violating the rules, Mall Management should be notified.
- D. Vehicles do not usually remain overnight. There are exceptions, as a vehicle may be inoperable. Officers note any vehicles left overnight, and if the vehicle is left for several days without any notification to Mall Management, it may be abandoned and may be towed based upon the mall protocol for abandoned vehicles. The police should be called to determine if the abandoned vehicle is stolen. If the owner's identity is known, attempts to contact the owner should be made to determine a disposition.

5.4 Traffic Crashes

- A. When officers observe or are notified of a traffic crash, they should respond and ascertain if there are any injuries. Appropriate public safety personnel such as police, fire, and EMT should be notified if there are injuries. If there are no injuries involved, it is the decision of those involved in the crash on whether to notify the police.
- B. If any mall property is damaged, officers should attempt to obtain license numbers and identifications of those involved, and take an incident report. Photographs should be taken of the damage to property. If the persons involved refuse to show identification, officers should record all pertinent descriptive information they can.

5.5 Trash Compactors

- A. Officers should periodically check the trash compactor areas, looking for any security, safety, or cleanliness issues. If discovered, the supervisor on duty should be notified, who may contact the proper maintenance associates.
- B. If problems persist, Mall Management should be notified.

5.6 Roof Inspections

- A. Officers should periodically check the roof. This is an additional method to monitor parking lot activity while also looking for any roof maintenance defects. Observation of any water leaks, drains, or uncleanliness should be noted on the daily activity log and the appropriate maintenance associates notified.
- B. Officers should be aware and check any ladders that give roof access. All roof access points should remain secure.

5.7 Weather Watch

- A. Officers should be aware of any weather issues that may cause problems or safety issues to the mall.
- B. Officers should notify Mall Management if icy conditions or accumulated snowfall of 1" or more exists.
- C. If severe weather exists, officers should report spotting any tornadoes, lightning strikes, flooding, or power outages to the operational chain of command, Mall Management and proper public safety authorities such as Police, Fire or EMT.

5.8 Physical Condition of Structure

- A. While on patrol, officers should look for the following:
 - 1) Damage or defacement to exterior building surfaces.
 - 2) Defects in parking lot or sidewalk surfaces.
 - 3) Malfunction or improper operation of parking lot lights.
 - 4) Refuse accumulation or unauthorized dumping.
 - 5) Damage to landscaping.
- B. If any conditions present a public safety hazard, the operational chain of command and Mall Management should be notified.

5.9 Unauthorized Use of Property/Trespassing

- A. Prior permission must be obtained from Mall Management to use the parking lot for anything other than parking vehicles coming to and from the property.
- B. Officers who observe suspected unauthorized activities on the property should check first with Mall Management. If permission was not granted, officers should make contact with the persons and ask them to stop their unauthorized activity. If they refuse or fail to do so, Mall Management should be notified, and the violators should be asked to leave the property. If they refuse or fail to do so, the police should be called.

CHAPTER 6: ASSISTANCE TO PATRONS

6.1 Criminal Activities

- A. Visitors come to the mall with an expectation that they can shop, dine, or be entertained in a safe and secure environment. Our focus is to provide an environment where everyone not only feels safe, but they actually are safe.
- B. Officers remain alert to all activities, and when criminal activity occurs, they must act within the scope of their responsibilities to aid the victim of a crime.
- C. When crimes are observed in progress, officers should immediately call the police. They should attempt to monitor the situation, recording descriptions of perpetrators and help guide the police to the suspect. If the suspect flees the area, officers should attempt to get a direction of travel and any vehicle information to pass along to the police.
- D. When violent actions occur, the officers have the right to protect themselves or an innocent person, but they are not required to place themselves in harm's way in order to confront or capture a suspect.
- E. In incidents where the crime has occurred and the suspect has left the area, officers should proceed to the location and provide aid to the victim. The first officer on the scene should secure the area to prevent damage or loss of evidence. The scene should remain secure until the police arrive, and then the responsibility should be turned over to them.
- F. Officers should make sure the victim is alright, and provide or summon any necessary medical assistance if needed.
- G. Officers should take any required incident reports and gather statements from victims and witnesses.

6.2 Incidents Involving Juveniles

A. If a juvenile is the victim of a crime, the officer should aid in notifying the parents or guardian. The parents or guardian should determine if the police should be called, as most police agencies require a parent or guardian to file a police report.

- B. If the juvenile is the perpetrator of a crime, the police should be notified if the victim wants to file charges. When the police arrive, they can determine when to call the parents or guardian, as they may want to transport the juvenile to their headquarters or other facility. If the police want the parents or guardian to come to the Mall to pick up the juvenile, the officer should provide an office or secure area to aid the police in this disposition.
- C. If younger juveniles are involved in disruptive behavior, the officer should ask them to stop the behavior. If they refuse or fail to comply, the officer should attempt to locate their parent(s) or guardian. If the parent(s) or guardian is located, the officer should politely ask them to control their children. If they refuse or fail to comply, the officer should notify the supervisor on duty or Mall Management, who may request they leave the mall. If the parent(s) or guardian cannot be located, the police should be called.
- D. If older juveniles, who have provided their own transportation to the mall, are involved in disruptive behavior, the officer should ask them to stop the behavior. If they refuse or fail to comply, the officer should notify the supervisor on duty or Mall Management, who may request they leave the mall. If they refuse or fail to comply with requests to leave the mall, the police should be called.

6.3 Criminal Trespassing

- A. Any person who is a continuous source of problems, violating the mall's rules and policies, or commits a criminal offense within the mall or on its property is subject to being banned.
- B. Banning someone from the mall is a very serious matter and is completed only with the authorization of Mall Management.
- C. When a banning occurs, the person being banned must be advised of the reason, terms, and scope of the ban. If the person is an employee of one of the tenants, special accommodations may be required to allow access to their place of employment.
- D. A database will be kept in the security office of those who have been banned, along with all other pertinent information concerning the subject.

- E. If the person violates the ban, officers may approach and warn them that they must immediately leave the property. If the person refuses or fails to comply, the supervisor on duty and Mall Management should be notified and the police should be called. The officer should attempt to monitor the suspect's location until the police arrive.
- F. When the police arrive, they may require a representative from the mall to file criminal trespassing charges. This should be a Security Supervisor, Security Manager or Mall Management that signs the complaint and affidavit.
- G. Officers should never attempt to physically capture or take into custody a violator. Instead, they should wait for the police.

6.4 Disturbances

- A. If persons are engaging in disruptive behavior or their conduct is disorderly, the officer should ask them to stop their actions. If they refuse or fail to comply, the officer should notify the on duty supervisor and the person(s) should be politely asked to leave the mall. If they refuse or fail to comply, the police should be called.
- B. If the disturbance is violent, the officer should request the on duty supervisor and immediately call the police. All attempts should be made to protect innocent persons, but officers are not requested to place themselves in a situation in which they may be assaulted. Rerouting visitors around the disturbance and being a good witness is preferable to becoming involved in the violent disturbance.
- C. If an organized demonstration occurs, Mall Management should be notified immediately, and the officers should await direction. If Mall Management wants the demonstration to cease, officers should politely ask the demonstrators to immediately stop their actions. If they refuse or fail to comply, the police should be notified. When the police arrive and in their presence, the demonstrators should again be politely asked to cease their actions. If they refuse or fail to comply, they should be politely asked to leave the property. If they refuse or fail to comply the situation should be turned

over to the police. Mall Management or their designate should be prepared to file a complaint and affidavit for Criminal Trespassing.

6.5 Mall Walking

A. As a community service, many malls allow persons to walk the mall for exercise. In some locations, this is permitted before and after the stores open. Officers should be alert at all times for persons who may suffer medical emergencies.

6.6 Personal Illness or Accidents

- A. If a person becomes ill or is injured while at the mall, officers should immediately respond and ascertain if medical attention is needed, while attempting to make the person as comfortable as possible. Once the situation is resolved, the appropriate reports should be taken to document the incident.
- B. The person should be asked if they need professional medical assistance. If they state yes, then the officer should summon emergency medical personnel.
- C. When calling for an ambulance or EMT, the officer should describe the illness or injury and the exact location in the mall or on the property the victim is located. Additional officers may be used to meet and guide EMT personnel to the victim.
- D. Only officers who have been trained in first aid and CPR, and currently have certifications may render immediate aid to the victim. Aid should only be rendered if the situation clearly requires immediate attention, such as in choking, profuse bleeding, difficulty breathing, or cardiac issues.
- E. While awaiting the medical authorities, officers should keep traffic flow away from the victim, giving them plenty of room.
- F. The personal effects of the victim should be safeguarded and turned over to a family member, fire or police personnel. The officer should document the identity of who the property was given to.
- G. If the person is injured, such as in a slip and fall accident, officers should follow the policies described in the Glimcher Insurance and Risk Management

"Best Practices" Manual. In all cases of personal injury, photographs should be taken of the scene, noting conditions and involved factors and included with the incident report. Officers should not take photographs of the victim or their injury.

H. If the person inquires who will pay for injury costs or damaged property, they should be referred to Mall Management.

6.7 Lost Persons

- A. Lost persons, whether adult or juvenile, should be treated as a priority. Officers should be patient, empathetic, and professional at all times.
- B. The person(s) reporting should remain in the area where the lost person was last observed, in case they return. All descriptive information should be gathered and provided to all officers on duty, as well as mall associates. The more people that are looking, the better the success rate of finding the lost person.
- C. A thorough search of the mall should be conducted at the direction of the supervisor on duty, with officers advising each other as areas are searched. If equipped, closed circuit cameras should be used to aid the search. Communication is the key to success in these circumstances.
- D. If all efforts are exhausted with no success, the reporting person(s) should be aided in calling the police.

6.8 Lost Possessions

- A. Many times, items are recovered that have been lost by visitors at the mall. Officers should follow the established policies and procedures for each mall in dealing with recovered lost possessions.
- B. Officers should inventory items recovered and document, with witnesses, anything of value, especially jewelry, cash, and credit cards.
- C. If items go unclaimed, mall policy will dictate the disposition. ORS Officers are prohibited from receiving any disposed item, unless they can prove they were the person who originally lost it.

6.9 Patron Vehicle Assistance

- A. If a visitor advises that their vehicle will not start or operate, officers should not attempt to work on them. Instead, they should assist in contacting private vendors that offer these types of services. Officers should make sure the stranded persons are in no immediate danger, and check back with them periodically as they await professional services. Stranded persons should not be left alone in the parking lot after dark.
- B. If a visitor advises they cannot find their vehicle, the officer should get a description and advise other officers, while searching the parking areas. If the vehicle is not found, the visitor should be aided in notifying the police, as the vehicle may have been stolen.
- C. If a visitor advises they have been locked out of their vehicle, the officer should aid them in contacting a towing service, a locksmith, or the police. If the mall is equipped with lock out tools, and the officers are trained to use them, the officer may attempt to unlock the vehicle after obtaining identification and a signed waiver from the person requesting the service. The officer will fill out all appropriate reports concerning the incident.

6.10 Personal Escorts

- A. Officers may escort patrons to their vehicles if a request is made. The officer should be courteous and professional. Once the patron has reached their vehicle and are secure inside, the officer should clear and assume normal patrol.
- B. If during the escort the officer determines the patron is in imminent danger, the police should be called, and the patron should be returned to the safety of the mall.

6.11 Shoplifting and Other Retail Crimes

A. On occasion, ORS Officers are called to tenant stores where crimes have occurred. Officers may assist the tenant in notifying the police, but should not

become involved in the confrontation or apprehension of the suspect(s). Officers may be good witnesses and are there to maintain control, but the tenant is responsible for their own primary store security measures. If a crime occurs, such as shoplifting, and the suspect does not cooperate with the tenant or their loss prevention personnel, the police should be called. ORS Officers are not to participate in chasing or apprehending a fleeing suspect.

- B. If such requests are made by tenant employees, the Security Manager or Mall Management should meet with the tenant store management as soon as possible.
- C. If a crime occurs in a tenant store and ORS Officers are notified, appropriate incident reports should be prepared.

6.12 Emergency Telephone List

- A. A listing or database of all emergency telephone numbers and contact information should be maintained in the Security Office. When the tenant stores are closed, this listing should be consulted to contact the designated tenant representative if a problem exists that requires notification at their store or tenant space.
- B. Officers continue to call each name assigned to the tenant store or location, until contact is made. All efforts are documented by the officer.
- C. This listing is confidential and should not be released to anyone without approval of the Security Manager or Mall Management.

6.13 Tenant Intrusion Alarms

A. Many tenant locations have burglar and intrusion alarm systems. Upon discovering an activated alarm, the police should be immediately contacted. The next notification should be to the designated person on the Emergency Telephone List. After making the notifications, officers are to simply observe and be good witnesses, without placing themselves in harm's way. Officers are not authorized to enter a tenant store or space, but should grant access to the police when they arrive if the officer has the capability to do so.

ORS, LLC Operations Manual

- B. The locking of the tenant stores and spaces is the responsibility of the individual tenant. If a store or space is discovered open or unlocked, the officer should contact the designated person on the Emergency Telephone List. If it appears there has been a break in or forcible entry, the police should be notified. The officer should not enter the store or space, unless requested by the tenant representative on the scene.
- C. An incident report should be taken to document intrusion alarm activity.

6.14 ORS Special Services

- A. On occasion, tenants or companies conducting work at their location may require security services beyond the normal mall security patrol.
- B. ORS does provide Security Patrol and Stationary Guard(s) services to tenant stores or their vendors. ORS does not provide loss prevention officers.
- C. If requests are made for special services, the Security Manager should be notified and will determine service based upon direction given through the Glimcher Ancillary Sales Program manual.

CHAPTER 7 COMMUNICATION TOOLS

7.1 Reports

- A. Accurately documenting activity and incident reporting is paramount to preserving valuable information. This information aids in proper strategic planning and resource allocation. It also memorializes incidents through the proper gathering of facts and evidence, which may be required in the future.
- B. Each mall has various reports and forms used to track activity and incidents. Officers receive instruction during initial training on what reports and forms to use at each mall. Through the use of technology, taking reports and preserving the records aids the mall personnel in their day to day operations. All reports and documentation must be truthful, not embellished or opinionated, and contain facts.
- C. <u>Daily Activity Reports</u> are used to record the activities and general observations of each officer throughout the course of their assigned shift. Information is recorded by the officer that shows where, when, and what the officer did or observed during their patrol rounds. The report should include, but is not limited to the following:
 - Date and time officer begins their shift, what officer they relieved, and break and meal times.
 - 2) Any accidents or injuries and officers actions.
 - 3) Services provided including escorts, checks, and inspections.
 - 4) Radio, keys and any other equipment assigned.
 - 5) Times and location of patrol activities, minimally every 30 minutes.
 - 6) Identity of any special visitors, times of arrival and departure or other pertinent information.
 - 7) Any hazards or maintenance issues and action taken.
 - 8) Any contact with Mall Management, Law Enforcement. Fire or EMT personnel.
 - 9) Any illegal, suspicious, or prohibited activities.

- D. <u>Incident Reports</u> are used to document any condition or occurrence that is serious enough to warrant extensive narrative explanation. The report should be prepared based on the fundamentals of report writing that include gathering the basics of who, what, when, where, how, and why. The officer should make every effort to obtain the information required in each blank box or field on the incident report if the information is available. After the officer takes action concerning the condition or occurrence, an incident report should be taken. If possible, the incident should be further documented through video and photographs. Incidents that should be written up include, but are not limited to the following:
 - 1) Any improper or illegal activity including arrest by law enforcement authorities in the mall or on mall property.
 - 2) Any disasters such as flood, fire, or storm damage.
 - 3) Any electrical outages or system malfunctions.
 - 4) Any vehicle traffic crash on mall property.
 - 5) Any vandalism or property damage to the mall or mall property.
 - 6) Any accidents such as slip and fall incidents in the mall or on mall property.
 - 7) Any situation in which Mall Management or the operational chain of command have requested a report.
 - 8) Any situation the officer feels needs a report after obtaining direction from the supervisor on duty.

7.2 Complaints

- A. Officers in their day to day activities are many times approached by persons who wish to complain about a situation or occurrence. When approached, the officer should be polite and professional, and aid the person in communicating their complaint to the proper authority so the complaint may be properly investigated. Officers should listen to ascertain where the complainant should be properly directed. Officers should not discuss, agree, defend, or argue with the complainant.
- B. Complaints against tenant store employees should be referred to the tenant store management.
- C. Complaints against the mall should be referred to Mall Management.
- D. Complaints against ORS Security personnel should be referred to the Security Manager.

7.3 Radio Procedure and Usage

- A. The radio is the primary communication tool used by the officer on duty. At the beginning of each tour of duty, the officer should test the radio, ensuring it is working properly. Each officer is trained in the usage and maintenance of the radio system at the mall they serve during their new hire training. If the officer has any questions concerning the operation of the assigned radio, they should immediately contact the supervisor on duty.
- B. Some of the general operational guidelines for radio usage include, but are not limited to the following:
 - 1) Officers should stay in constant contact with each other and the base unit.
 - 2) Officers should always listen for radio transmissions.
 - Officers should always identify themselves with each transmission.
 - 4) Information should be relayed in a calm, clear, concise, and courteous manner. Use of profanity, slang,

- horseplay, or crude remarks is prohibited. An officer's safety may be at stake.
- 5) Officers should be familiar with the established radio codes used at each mall.
- 6) Acknowledge transmissions promptly.
- 7) Conduct radio checks every 30 minutes.
- Officers must keep in mind that the radio transmissions are not private. Officers should be professional at all times.
- C. If the officer discovers the radio is not working, they should immediately obtain a replacement. If officers do not hear from a fellow officer when called, they should immediately contact the supervisor on duty and make efforts to locate the officer to check on their well being.

7.4 Telephones

- A. Officers may be assigned to security office or control center duties, based on the requirements of the mall they serve. The following procedures should be followed when using the telephone:
 - 1) Incoming calls should be answered immediately.
 - The officer answering the call should identify themselves and be prepared to take information or messages.
 - 3) The officer should always be professional, speaking in a polite, calm, and clear manner.
 - 4) Keep conversations short so as to not tie the phone lines up unnecessarily.

7.5 Alarm Systems

A. Officers should stay focused and intently monitor alarm systems for fire and intrusion detection. If an alarm signal is transmitted, an incident has occurred. Whether the incident is real or a malfunction is determined through immediate investigation. Officers should never assume an alarm is false. Officers respond to alarms based on the site-specific protocol at each mall where they serve.

7.6 Closed Circuit Television Systems (CCTV)

- A. Many malls use CCTV to enhance the security monitoring capabilities. This provides the officers a tool to see throughout the mall and mall property and capabilities to record any activity.
- B. Officers receive site-specific training at the malls that have systems in operation. Officers assigned to the control center where CCTV systems exist should continually monitor the screens and look for suspicious activity. If there is a problem, officers should be sent to the problem location to investigate further.
- C. CCTV systems are an additional resource security tool. The system should never be used for entertainment or non-business reasons.

OHIO RETAIL SECURITY LLC Corporate Retail Security LLC California Retail Security Inc.

ORS Operations Manual Acknowledgement

Ohio Retail Security (ORS), Corporate Retail Security, and California Retail Security officers must receive the ORS Operations Manual upon his/her initial hire date and upon any new release of the manual. The employee and trainer will review this manual, after which the Security Manager will verify that the employee understands and agrees to comply with the policies & procedures set forth herein.

Employee Name:	Date of Hire:
Mall Name/Location:	
Trainer Name:	
I,, cer Corporate Retail Security, LLC, and/or Califor received my ORS Operations Manual and full state that any questions I may have had have	rtify that being a security officer for Ohio Retail Security, LLC, d/b/arnia Retail Security, Inc., LLC, from here on referred to as ORS, have ly understand and will comply with all areas covered herein. I further been explained to my satisfaction.
terminate my employment at any time, for a employment of any associate at any time for	n Ohio Retail Security is "at will" which means I have the right to iny reason just as Glimcher also reserves the right to terminate the or any reason within the bounds of the law. I understand that all ered at-will employees and that if I disagree with that status, I should ing, for clarification
(Employee Signature)	(Date)
I,, a \$ has satisfactorily reviewed the ORS Operation covered herein.	Security Manager for ORS, certify that the above named employee ons Manual and has communicated a full understanding of all areas
(Security Manager Signature)	(Date)