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North American Operations Grooming Directive		

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1.0 **Purpose**

As a security workforce, adherence to a consistent appearance through physical uniforms and grooming standards ensures that personnel can be identified easily as Company employees, and simultaneously projects the necessary professionalism to both our customers and the public. This Grooming Directive outlines the grooming and hygiene requirements for security guards, officers, and other frontline employees when in the workplace or when otherwise representing Constellis or its affiliates and subsidiaries (“the Company”). Furthermore, it outlines the process for consideration and approval of exceptions to this Directive. The standards of grooming and hygiene outlined below set forth the *minimum requirements* to which all operational employees are required to adhere. Any additional grooming or hygiene standards outlined in a collective bargaining agreement or required by a contract must also always be obeyed.

2.0 **Scope**

This Directive applies to all guards, officers, and other frontline personnel in the Company’s North American Operations (“NAO”) Division.

3.0 Directive

Every employee is expected to practice daily hygiene and good grooming habits as detailed in this directive. The below outlines the minimal standards expected of all personnel.

3.1 Hair

In accordance with the Federal Protective Service National Lesson Plan (formerly known as the SMART Book), which was adopted by the Company, “Your hair must be clean, neat and not interfere with the proper wearing of official headgear. The height of the hair from the scalp to the highest point on the coiffure is not to exceed 2 inches. Hair must not fall below either the eyebrow when the head is uncovered or protrude on the forehead below the inside sweatband of headgear. A male PSO's hair must not cover the top of his collar when standing. A female PSO's hair will not exceed below the bottom edge of her blouse collar when standing. Bouffant and modified styles are acceptable if they allow proper wearing of the official headgear. Hair ornaments, such as flowers and combs, will not be worn. Items to hold hair in place such as bobby pins, hairpins and barrettes may be worn if they are concealed and are of a color that blends with the hair. The cap may be secured to the hair with up to two plain hatpins with black or dark blue pinheads.”

3.2 Facial Hair

Sideburns and mustaches must be neatly trimmed and kept to no more than one quarter inch ($\frac{1}{4}$) in length from the skin. Sideburns cannot extend below the bottom of the ear. The style known as “mutton chops” or “lamb chops” is not permitted. Mustaches should go from corner to corner of the mouth without exceeding beyond it. Beards are not permitted without an exception approved through the accommodation process outlined in Section 5.0. Even with an approved exception, a beard may not be longer than the one quarter inch ($\frac{1}{4}$) length permitted for sideburns and mustaches.

3.3 Makeup and Cosmetics

Makeup and other cosmetic products may be used sparingly, and must be professional and conservative.

3.4 Fragrance

Recognizing that employees and visitors to the workplace may have sensitivities or allergies to fragrant products, including but not limited to perfumes, colognes, fragrant body lotions, or hair products, the Company is a fragrance-neutral workplace. Fragrant products that may be offensive to others should be used in moderation.

3.5 Fingernails

Hands and fingernails should be clean and conservatively manicured. Nail polish for employees is permitted, but must be professional and conservative. For example, there should be no unusually long nails, and they should have only natural or muted polish colors.

3.6 Jewelry

As required in the Federal Protective Service National Lesson Plan, “While you are on duty, you may not wear jewelry such as earrings, bracelets, body piercings, chains, religious insignia, buttons, or pendants. You may wear a ring, but only on the third finger of one hand. You may wear a necklace, but only if it is completely concealed beneath the uniform shirt. You must remove ALL body piercing jewelry prior to working on post unless it is completely covered by your uniform.”

3.7 Tattoos

Visible tattoos may not contain offensive subject matter. Body art other than tattoos (such as surgically implanted ball bearings, spikes, and the like) are not permitted in the workplace.

4.0 Violations

Violations of this Directive may result in discipline, up to and including termination.

5.0 Exceptions

Employees may formally seek an exception to any of the requirements outlined above as required by law, including accommodations because of a qualifying physical impairment or a sincerely held religious belief. Exception requests should be rare, based on some reasonable accommodation consideration, and narrowly tailored to ensure the Company’s need to have personnel. Each exception request will be evaluated on a case-by-case basis. Approvals will be granted either permanently or temporarily depending on the circumstances. The Company reserves the right to revoke a previously-approved exception if it is no longer necessary, no longer permitted by the contract, or otherwise causes undue hardship or burden to the Company.

5.1 Exception Request Workflow

An employee seeking an exception must complete the “Reasonable Accommodation Request Form,” which is available via the Company’s Policy Portal. The request form must be accompanied by a letter on organizational letterhead, signed by a medical doctor for an exception based on a medical condition, or a religious leader for one based on religious belief and affiliation. Any request made without both the form and the signed letter on letterhead may be rejected for insufficient documentation.

The supporting letter must specify the rationale for the request, as well as state exactly what the request entails and how long the accommodation is necessary. For example, a religious leader indicating the need for a beard must state the length of time for which the accommodation is requested, how long the beard must be, and the reasons for both. (As noted above, even with an approved exception, a beard may not be longer than the one quarter-inch [$\frac{1}{4}$ ”] length permitted for sideburns and mustaches.) Absent contractual requirements, all requests based on a medical condition will be reevaluated every six (6) months.

The form and supporting letter will be submitted to the responsible NAO Director via the employee’s chain-of-command. The authority to approve an exception rests with the responsible NAO Director, in consultation with Human Resources. Prior to issuing a denial, Directors must consult the Company’s Legal Department.

The Director will communicate with the contract’s Program/Project Manager, who will issue the decision in writing. During the time the decision is pending review, the employee shall comply

with this Directive. With limited exception, all requests will be approved or denied within thirty (30) days of the employee's delivery to his or her supervisor.

Upon an approval, the employee will be supplied with proof of the granted exception (typically in the form of a card) which the employee must always keep on his/her person while on duty. The employee shall be prepared to present this proof upon any request from the Company or the client.

5.2 Exception Appeals

An employee who has a request denied is authorized one appeal absent a material change in circumstances. The employee will write a letter outlining the basis of the appeal, and submit it to the NAO Vice President for Operations (VPO) through the employee's chain of command. The VPO will consult with all relevant parties, including the Legal Department, before rendering a final decision. The appeal must be filed within thirty (30) days of the original decision. Any appeal submitted more than thirty (30) days after the original decision will not be considered. The VPO will issue a final decision in writing within thirty (30) days of the employee's appeal submission.

RELATED DOCUMENTS:

- **NAO Grooming Reasonable Accommodation Request Form**

VERSION HISTORY

	Version	Version Date	Author	Description
1	1.0	9/23/2021	John Bolen	Initial version

NAO GROOMING REASONABLE ACCOMMODATION REQUEST FORM

****This form must be accompanied by a letter on official organizational letterhead and signed by the healthcare provider or religious leader.****

Employee Name: _____

Phone: _____ **Email:** _____

Job Title: _____ **Contract:** _____

Supervisor Name: _____

Explain the nature, extent, and duration of your request:

Describe the precise accommodations you believe are needed:

Provide the name, address, and telephone number of your healthcare provider or religious leader that supplied the supporting documentation. The provider may receive a request from Constellis for additional information regarding your request for an accommodation.

I authorize the release of information to Constellis management as deemed necessary by Human Resources or the Legal Department to facilitate this request for accommodation.

Printed Employee Name: _____

Employee Signature: _____

Date: _____