

# 2011

# **Effective Crowd Management** Guidelines on how to maintain the safety and security of your customers, employees and store

www.nrf.com/crowdmanagement



## **About the Guidelines**

For a third consecutive year, NRF is issuing its Effective Crowd Management Guidelines report. Special events and promotional sales at retail stores and shopping centers are occurrences retail, mall security and law enforcement officials plan and prepare for in tandem. There are also unplanned events and crowds retailers are now beginning to see in the form of flash mobs. Trends indicate these events will continue in the future, so the guidelines have been updated with new events and information for 2011. www.nrf.com/crowdmanagement

## **About the National Retail Federation**

As the world's largest retail trade association and the voice of retail worldwide, NRF's global membership includes retailers of all sizes, formats and channels of distribution as well as chain restaurants and industry partners from the United States and more than 45 countries abroad. In the U.S., NRF represents an industry that includes more than 3.6 million establishments and which directly and indirectly accounts for 42 million jobs – one in four U.S. jobs. The total U.S. GDP impact of retail is \$2.5 trillion annually, and retail is a daily barometer of the health of the nation's economy. www.nrf.com

## **NRF Contacts**

Survey Information:

Angelica Rodriguez Sr. Director, Loss Prevention 202-626-8142 rodrigueza@nrf.com

#### Media Inquiries:

Kathy Grannis Director, Media Relations 202-626-8189 grannisk@nrf.com

# **Table of Contents**

Section 1
Introduction4
Section 2
Promotional/Holiday Sales, Special Events5
Section 3
Sales and Events vs. Emergency Management Crowd Controls6
Section 4
Flash Mobs vs. Criminal Flash Mobs/Multiple Offender Crimes7
Section 5
Mall-based Retailers vs. Non Mall-based Retailers9
Section 6
Crowd Management Guidelines11
Section 7
Conclusion15
Appendix A
Promotional Sales and Special Events Checklist16
Appendix B
Criminal Flash Mob Incident Suggested Guidelines &
Sample Response Protocols

# **Section 1: Introduction**

During the 2011 holiday shopping season, retailers are expected to see modest sales growth. In order to draw in bargain hunters, stores and shopping centers are planning big promotions. From the release of popular smartphones and designer apparel to hosting events and sales, promotions will run the gamut. Tales of unexpectedly large crowds are all too familiar for retail and shopping center loss prevention and security professionals.

Retailers typically save the best sales and promotions for Black Friday, but many companies will be choosing to offer holiday promotions early this year (in stores and online) in hopes of attracting more shopping dollars. Some stores even started offering holiday merchandise as early as September. These adjustments in the schedule can alleviate some of the massive crowds on Black Friday and traffic flow during pre-season weekends, but consumers have grown to expect special promotions and events. Retailers can plan for some crowds but others cannot be anticipated. Regardless, loss prevention and security professionals must be prepared to react and respond to incidents quickly and effectively.

This year, retailers and customers alike have heard a lot about "Flash Mobs", groups of people who organize through social media, assemble suddenly in a public place, and perform an unusual (sometimes seemingly pointless) act for a brief period of time, then disperse. While many of these random "performances" are comedic and get a good laugh, criminals have started to take advantage of this mechanism of organizing to commit multiple offender crimes, also known as criminal flash mobs. Criminal flash mob incidents wreak havoc on businesses, cause safety concerns for customers and employees, and directly impact a retailer's bottom line.

While scheduled events give retailers plenty of time to plan and train for a flawless event, it is the unexpected events retailers consistently train for and prepare to handle. Teams with a plan already in place are in the best position to minimize any potential issues and make the shopping experience a positive one for consumers when the unforeseen arises.

The purpose of this report is to provide guidelines and considerations for both retailers and mall management officials when planning special events, including Black Friday, product launches, celebrity appearances and promotional sales. Additionally, this paper will address how to manage unexpected crowds and spontaneous occurrences.

# Section 2: Promotional/Holiday Sales, Special Events

The challenging economy has forced both retailers and shoppers to be very resourceful. Consumers have become accustomed to special events and promotional sales as a part of the winter holiday season and other holidays throughout the year (e.g. July 4<sup>th</sup>, Memorial Day, Back to School, etc.). As Americans continue to seek great deals, retailers are increasingly using special events and promotions to drive traffic to their stores. Some of these events include:

Promotional/Holiday Sales	<u>Special Events</u>
Black Friday Sales	Giveaways
Limited quantity sale items	Celebrity Appearances
Early bird specials	Game and video releases
One-day sales	Book releases
Incredibly low prices	Designer brand launch events

Retailers are not the only ones hosting special sales and events. Mall management and property development companies are also courting shoppers by hosting events in their locations. While these events drive traffic that may benefit retailers, they require additional preparation and communication. Pre-planning requires multiple resources and cooperation among several departments including loss prevention, operations, merchandising and marketing.

The amount of additional resources and pre-planning is subjective, as special events can attract as few as 10 people and as many as tens of thousands. Thus, some events can be planned a few days in advance while others may require months of planning.

Retailers agree that the top priority in event planning is safety – the safety of customers, associates, service providers and security personnel. Proactively planning and preparing for special events ensures the success of an event. Some organizers stage dress rehearsals as the event (in size or scope) may warrant these measures. Retailers tend to have more control over events that occur or are hosted by their stores, external events may also require proper planning and reaction. These events can include:

- Protests and civil disturbances (e.g. Occupy Wall Street protests, London riots)
- Parades and rallies
- Sporting events
- Political events or conventions (e.g. Democratic/Republican National Conventions, etc.)
- University homecomings, games or special events that increase traffic to shopping centers
- Citywide meetings or conferences

# Section 3: Sales and Events vs. Emergency Management Crowd Controls

Planning for special events, promotional sales and Black Friday traffic is very different than planning and preparing for emergency management crowd control: the former is proactive while the latter is more reactive. Special events and sales offer consumers and employees advance notice. Retailers have time to schedule extra staff and security, use signage, line stanchions, tickets/wristbands and implement other advance planning protocols. The ability to prepare enables retailers to arrive at "game time" with an articulated plan, communication to customers, associates, management, security and, if the event warrants, law enforcement and mall management.

Even the best-laid plans run into challenges. Contingency plans should be created for the "what if" situations that may arise, including larger-than-anticipated crowds, inclement weather, power outages, large lines of angry customers, trampling, shooting, merchandise sell-outs, etc. This can also include alternative entry/exit points for customers, celebrity guests, associates and security/law enforcement.

To prepare for the unexpected, retailers should consider:

- evacuation routes
- communication plans
- law enforcement/public official engagement
- reunification
- preservation of evidence

# Section 4: Flash Mobs vs. Criminal Flash Mobs/Multiple Offender Crimes

Flash mobs are relatively new phenomena that have taken retailers and consumers by surprise. Flash mobs are defined as groups of people who assemble suddenly in a public place, perform an unusual and sometimes seemingly pointless act for a brief time then disperse. Flash mobs are organized via telecommunications, social media, or viral email and often gather for the purposes of entertainment or satire. There are reports of flash mobs singing songs in food courts, conducting street performances, and engaging in other lighthearted acts. While many of these random "performances" are innocent enough and get a good laugh making their way around YouTube, some flash mobs are more serious in nature and may be organized to gain awareness of an issue for the purpose of demonstrating or protesting a cause.

Recent examples of flash mobs:

- In early October 2011, fashion designer Diane von Furstenberg called her fans and loyal customers to organize in New York City and Paris, wear one of her famous wrap dresses and march through town to luxury stores as part of launching her new fragrance. The events caused crowding on streets, but also caused congestion in stores. There was marketing of this event, which potentially made it possible to plan in advance, however it is always difficult to judge how many people will actually attend these gatherings.
- Organizers used Twitter and other social media resources to rally individuals to descend on lower Manhattan, NY on September 17, 2011. The movement, termed Occupy Wall Street, is expected to last indefinitely and has grown significantly. Protesters are now occupying business districts in hundreds of cities throughout the world and calling for reform and improvement through economic measures.
- On August 20, 2011, rapper Machine Gun Kelly organized a flash mob at a Cleveland, Ohio mall. Hundreds of teens descended on the mall seemingly instantaneously, overwhelming mall security and creating safety hazards.

Non-criminal/comedic flash mob incidents can be harmless in nature; but multiple offender crimes (criminal flash mobs) are nothing to joke about. Retailers are raising red flags about multiple offender crimes which are wreaking havoc on their business and causing concerns about the safety of customers and employees. According to a recent NRF survey, nearly one out of 10 retailers report they have been the victim of a multiple offender crime incident.

Earlier in 2011 the National Retail Federation released a paper on Multiple Offender Crimes/ Criminal Flash Mobs. NRF found the term "flash mob" was being overused by the media to report traditional multiple offender crimes, especially involving teenagers. Multiple offender crime incidents are groups or gangs, often teenagers, swarming a store and overwhelming store employees with their sheer number and speed. Traditionally, these groups engage in grab-and-run scenarios where offenders quickly enter stores and target specific merchandise – such as high-end handbags, jewelry and designer clothing – then flee, sometimes to a waiting vehicle or, as was the case in several high profile incidents, using mass transit. Criminal flash mobs engage in serious criminal behavior such as theft, assault, vandalism and burglary.

One vivid example of a criminal flash mob incident occurred in late June 2011. A department store in downtown Philadelphia was targeted by juveniles, who organized the incident using social media. Forty individuals stormed the store stealing thousands of dollars in sneakers, socks, watches and other items. Police apprehended several juveniles and one adult who were cited for retail theft and conspiracy.

For more information, refer to NRF's Guidelines and Considerations for Handling Multiple Offender Crime Incidents: <u>http://www.nrf.com/multipleoffendercrimes</u>

## Section 5: Mall-based Retailers vs. Non Mall-based Retailers

Each retailer has its own set of policies and procedures for dealing with crowds, though mallbased retailers and non mall-based retailers have different considerations.

#### **Mall-based Retailers**

Mall-based retailers include specialty stores and anchor/department stores in a mall and do not generally have domain/control over the common areas outside of their stores or in the parking lot. For special events and sales that attract large crowds outside of the store/mall, retailers need to partner with mall management through each step of the event.

When events are expected to cause long lines to form in the parking lot or in the mall's common area, retailers and mall management have the following items to consider:

#### Mall management approval of the event

- o Additional costs for enhanced security presence may be assessed
- Logistics of the line
  - o line placement
  - o line monitors
  - o tickets/wristbands
  - o signage
  - o stanchions
  - o inclement weather plan

#### • Security

- o mall security
- o store employees
- o utilizing third party security companies
- o security in the parking lot and mall common areas
- o in-house versus third party line monitors
- o law enforcement/event protection professionals

## Non Mall-Based Retailers: Stand Alone and Strip Center Locations

Stand alone retail locations and strip center stores encounter issues different than mall operators. In most cases, the retailer is responsible for all aspects of the event which may include line formation, crowd control, administering tickets/wristbands and working with extra security guards and law enforcement. Some retailers may even add entertainment to make the waiting experience less anxious and more pleasurable. For stores that do not have dedicated security or loss prevention staff, the on-site store team is often tasked with coordinating, planning, staffing and executing the event.

On the plus side, this approach offers a knowledgeable sales staff and personnel who know the clientele very well. However, this also poses challenges, especially if the event doesn't run seamlessly. Providing clear lines of communication, a corporate contact with key decision making capabilities as well as ensuring that the store manager has key contacts with local law enforcement and the mall/property management company is imperative.

# **Section 6: Crowd Management Guidelines**

Retailers, mall management and law enforcement can apply some basic components when preparing for an event to effectively utilize the resources at hand including: safety, communications, event logistics and contingency plans.

## <u>Safety</u>

Safety is a primary concern for retailers, especially when hosting in-store events. Plans should be made for the best interests of all people on-site during the event including:

- Customers
- Store Associates
- Service Providers
- Mall Management
- Law Enforcement

Extra security precautions retailers may consider include:

- Contacting local fire and law enforcement agencies to determine if the event site meets all public safety requirements.
- Ensuring all permits and licenses are obtained and that local emergency services, including the local authorities, are aware of the event (for events requiring special permits).
- Preparing an emergency plan that addresses potential dangers employees may face, including overcrowding, aggressive shoppers, violent acts, being struck/crushed by the crowd, fire and unexpected natural disasters. Retailers should consider sharing these emergency plans with local public safety agencies.
- Having key staff trained on how to perform Cardiopulmonary Resuscitation (CPR) and on how to use an Automatic External Defibrillator (AED) device.
- Instruct employees to exercise good common sense and follow instructions from authorized public officials or emergency first responders, keeping in mind the company policies.

## **Communication**

While every event is different, a comprehensive plan should allow for contacts with all affected internal and/or external individuals, including customers.

- **Prior to the Event** Advance communication is required for most events based on the scope and anticipated number of attendees. Large events, such as Black Friday, special promotions or celebrity appearances, may require planning two to three months in advance. Key contacts may include:
  - Appropriate internal departments
    - Facilities
    - Human Resources

Law Enforcement

Mall Management

- Loss Prevention
- Marketing/Advertising

#### • Appropriate external contacts

Customers

- Neighboring Stores
- Private Security Consultants
- **Day of the Event** On the day of the event, clear and effective communication to the operational team (cashiers, sales associates, loss prevention, security, service providers, store management) and to customers is critical. By keeping customers informed of the status of the event and the traffic flow, expectations on wait time or product availability can be managed appropriately.

Measures to clearly communicate on the day of the event include:

- Signage Provide legible and visible signs that describe entrance locations, store opening times, and other important information such as the location of major sale items and restroom facilities.
- Stanchions / Barriers Create barricaded lines with adequate numbers of breaks and turns at regular intervals to maintain orderly flow and reduce the risk of harm to customers and associates. These lines may either be outside or inside the store to manage traffic flow.
- **Public Announcements** Some retailers use the public announcement system to update customers on the status of store opening, location of promotional items, the start time of special events, evacuations, communicate with employees and other important information.

- Public Relations Operations
- Security
- Media

- Tickets / Wristbands Tickets and wristbands can be used to maintain orderly lines and manage expectations of customers. Generally these are provided by retailers hosting specials for the first customers in line or limited items. Additionally, retailers could consider using an internet lottery for high-demand items.
- Designated Chain of Command Identify a key event manager who will serve as the ultimate decision maker ensuring that all urgent issues and situations are addressed. Additionally, clearly outline roles of associates from general manager to security personnel to cashiers.
- Site Map Create a site map noting entrances, exits, traffic flow, line flow and back up plans for larger-than-expected crowds along with where appropriate store staff will be located.

## **Event Logistics**

From the last person in line to the center stage or the place where the hottest promotional items are located, the logistics of the event should be fully thought through and accounted for.

#### Event logistics to take into consideration for Customers in Line:

- Entry/Exit Points By limiting the accessibility of stores or other facilities to designated entry and exit points, traffic flow and crowd levels can be managed effectively. Additionally, propping open doors can decrease safety hazards that may arise with an influx of excited shoppers. Retailers should consider starting the line with some open space so that customers do not line up right at the entrance to the store. This will allow for orderly admittance into the shopping center/retail store and make it possible to divide the crowd into smaller groups, if necessary. Provide an alternate entrance for people with disabilities. Do not restrict egress, and do not block or lock exit doors.
- Traffic Flow Use environmental barriers and store layout to place promotional items/ entertainment areas in key spots to manage congestion. Additionally, clear signage can help crowds easily find their way through stores. If possible, use more than one entrance to alleviate overwhelming flow. Position security or crowd managers to the sides of entering (or exiting) public, not in the center of their path. When the store reaches maximum occupancy, do not allow additional customers to enter until the occupancy level drops.

# Extra, knowledgeable staff onsite will help ensure a successful event. Event logistics to take into consideration for Associates:

- Extra cashiers. Designate a head cashier/store manager solely stationed at the cash wrap to float and resolve problems
- Existing security and extra security including off-duty law enforcement or third-party security
- Make sure all employees and crowd control personnel are aware that the doors are about to open
- Utilize separate entrances for staff and appropriate door monitors in these areas

### **Merchandise Placement**

- During a promotional sale, strategically placing the sale items will help spread out the large crowd and manage flow better
- Retailers should also account for merchandise replenishment

## **Contingency Plans**

As mentioned in Section 3, the best-laid plans may run into challenges. Contingency plans should be created for the "what if" situations to mitigate additional safety and security concerns.

# **Section 7: Conclusion**

The challenging economy has changed the face of the retail community and required retailers to be more creative to attract consumers' shopping dollars. Interactive and engaging customer experiences, special events and celebrity appearances are only continuing to gain in popularity as brands aim to become a part of an individual's lifestyle rather than merely a place to purchase everything on their checklist.

Retailers and mall management continue to expand their experience planning and executing promotional sales and special events. However, each situation brings a different set of circumstances. Measures to mitigate risks that may occur with large crowds during the upcoming holiday season and future special events have been taken, but unexpected events do occur.

# **Appendix A: Promotional Sales and Special Events Checklist**

Each promotional sale and special event will be unique, however some of the same components to preparing and planning for the event can be included in the promotional sale/ special event plan. It's crucial to remember that every plan should be flexible and change with circumstances. Below is a checklist of items to consider incorporating into your plan.

#### **Event Assessment**

- > Event Type (celebrity appearance, in-store entertainment, promotional sale, etc.)
- Scope of Event (number of expected guests and duration of the event)
- > **Time Frame** (amount of advanced notice)

## <u>Planning</u>

- Staffing
  - Ensure that stores will have adequate staffing levels throughout the event. Staffing should take into consideration all critical positions (cashiers, loss prevention, security, re-stocking, sales associates, management)
  - ✓ Make arrangements for extra staffing and additional security personnel in locations where a history of prior incidents warrants increased attention.
  - ✓ For events that will draw large crowds, contact law enforcement to notify them of the upcoming event.
  - ✓ Utilize separate entrances for staff and appropriate door monitors in these areas.

#### > Training

- Associates working the day of the event and back-up associates should all be trained and knowledgeable of both the event and promotional items including merchandise placement, event location and timing of special/hourly promotions.
- ✓ Brief associates on what to communicate to unhappy customers and which managers and other store personnel should be notified to de-escalate certain situations.
- ✓ For large-scale events, consider hosting a dress rehearsal in advance.
- ✓ Associates should be trained on who to contact in the event of any situations and who the key decision maker is on the day of the event. Additionally, associates should be informed of procedures (if any)/ or protocols for dialing 911.
- ✓ Review evacuation procedures.

#### Communication

- Provide a clear communication plan which covers how critical information will be delivered on the day of the event to customers, celebrity guests, entertainers, associates, security personnel, service providers, mall management and law enforcement.
- Contact local fire and law enforcement agencies to determine if the event site meets all public safety requirements.
- ✓ When required by local authorities and to maximize safety, ensure that all permits and licenses are obtained and that local emergency services, including the local authorities, are aware of the event.
- ✓ Devise a clear communication plan on how potential issues should be communicated to the key decision maker.
- Designate a point of contact who will liaise with law enforcement prior to the event (if necessary) and during the event (if an emergency situation arises).
- Consider renting or purchasing two-way radios and utilizing them the day of the event to communicate with key managers, security personnel, floor monitors, etc. Cellular phones are not effective for mass communication.
- ✓ Utilize signage or pamphlets to communicate entrance locations, store opening times, traffic flow, merchandise placement and event location.
- ✓ Use public announcement (PA) system, if available, to communicate pertinent information to customers inside the store. If the PA system broadcasts outside the store, it could be used to communicate to customers waiting in line either prior to or during the sale/event. These announcements can also include seasonally appropriate music, information on specials and where they are located within the store.

#### > Physical/Environmental Considerations

- ✓ Store Layout Utilize the physical/environmental layout of the store to your advantage during the event. Entry and Exit Points should be determined based on how the crowd will be able to file into the store as well as the best place outside of the store where it makes the most sense for the line to form.
- Merchandise Layout Promotional sale items should be placed throughout the store to dissipate crowds and help alleviate potential congestion.
- ✓ Entertainment Location Similar to merchandise layout, the location of the special event/celebrity guest/entertainment should complement the layout of the store as well as any merchandise that may be promoted alongside the event. Security for both the celebrity/entertainer and customers should be taken into consideration for staging and execution of the event.

#### > Line Formation Considerations

- ✓ Pre-determine the location and flow of the line, with a back-up plan to manage the unexpected (larger crowds, extreme weather conditions, etc.).
- ✓ Consider staffing the line either with security, store associates or entertainers.
- ✓ Stage the line entrance away from the store entrance so that customers are not directly in front of the store entrance.
- ✓ Line monitors can assist in keeping customers updated with the status of events, availability of merchandise and other factors that may affect their decision to stand in line. Additionally, having line monitors builds rapport with customers as unpleasant news will be better received from a person who has been standing outside with them for a majority of their wait time as opposed to an unfamiliar face.
- Lighting up the parking lot to accommodate customers arriving at early hours or making additional accommodations, such as renting portable bathrooms, may also alleviate frustrations or anxiety of customers waiting in long lines.
- Position security or crowd monitors to the sides of entering (or exiting) public, not in the center of their path.
- ✓ Provide an alternate entrance for people with disabilities.

#### Event Logistics

- ✓ Pre-Opening
  - Establish early arrival times for associates.
  - Establish the timing and the personnel who will set out signage, line stanchions/ barriers, hand out wristbands, or act as line monitors communicating with early arriving customers.
  - Provide legible and visible signs that describe entrance locations, store opening times, and other important information such as the location of major sale items. Line stanchions/barriers should be set up prior to customers arriving.
  - Stanchions/barriers should be set up in a snake formation for crowd management purposes and have enough breaks and turns at regular intervals to maintain an orderly flow.
  - Use more than one entrance to alleviate overwhelming crowds, if possible.
  - When the store reaches maximum occupancy, do not allow additional customers to enter until the occupancy level drops.

- ✓ Store Opening
  - Determine what doors will open and who, if anyone, will monitor the doors. Make sure all employees and crowd control personnel are aware that the doors are about to open.
  - Consider propping open doors while the traffic flow entering the store is heavy; this will help avoid potential safety issues.
  - Create a site map, which includes traffic flow, clearly marks promotional items/ special event location, location of critical staff members and law enforcement liaison.
  - Have managers and key decision maker in key locations throughout the store when the store initially opens/event commences and at key times throughout the sale/ event.

#### > Emergency Situations

- ✓ Instruct employees to call 911 and follow internal procedures once they have called for assistance.
- Have Automatic External Defibrillator (AED) device(s) readily available and key staff trained on how to use the device as well as how to perform Cardiopulmonary Resuscitation (CPR).
- Address potential dangers employees may face including: overcrowding, aggressive shoppers, violent acts, being struck/crushed by the crowd, fire and unexpected natural/ man-made disasters.
- ✓ Consider sharing these emergency plans with local public safety agencies.

# Appendix B: Criminal Flash Mob Incidents Suggested Guidelines & Sample Response Protocols

The safety of customers and employees should guide any actions taken during the incident. The key function that associates should perform when a flash mob (or criminal flash mob/ multiple offender crime) is occurring is to Observe and Report.

Below is a checklist of items to consider incorporating into your plan. The following protocols for multiple offender crimes were created for retailers to consider when enhancing their existing theft, civil disturbance, crowd management, workplace violence and/or safety policies. In addition, retailers should reaffirm or update adherence to their corporate policies on Media Relations, and the release of video evidence. The National Retail Federation solicited information from dozens of leading retailers and law enforcement experts about multiple offender crimes. While the response protocols vary by company, the items below were consistent between all parties.

#### Prevention

- ✓ The safety of customers and employees should guide any actions taken during the incident.
- Retailers and law enforcement should monitor social networks and websites for indications of a planned event and then take appropriate action.
- ✓ As with other crimes, retailers, mall security and law enforcement agencies should continue to share intelligence about anticipated incidents.
- ✓ Associates should report to store management or Loss Prevention whenever they see unusually large gatherings of people inside or directly outside the stores.

#### > Response

- ✓ If safe to do so, use customer service techniques to discourage crime activity.
- $\checkmark$  Consider options for re-positioning associates in the store.
- ✓ Attempt to discourage the thefts by re-positioning associates near key areas of the store and valuable merchandise.
- ✓ Instruct employees and customers to retreat into a secure part of the store.
- To prevent the offenders from injuring associates, customers or causing additional damage to the store, stores should follow the prevention and apprehension guidelines issued by the corporate office.

#### > Observe & Report

- During the incident take mental note of each offender, including their physical description and clothing. Immediately following the incident, document your observations.
- Additionally, take a mental note of any property stolen, damaged or other pertinent information about company loss. Immediately following the incident, document your observations.
- Note and preserve any areas touched by offenders in order to facilitate the collection of evidence
- ✓ Any video of the event can assist in the documentation process and should be readily available for law enforcement officials (following company protocols for release).
- ✓ Based on applicable corporate policy, mall guidelines and local law enforcement preferences, store personnel should notify the appropriate parties.
- Apprehensions should only be facilitated by authorized personnel and only when safe to do so, according to applicable corporate policy and state laws.



325 7th Street, NW, Suite 1100 Washington, DC 20004 www.nrf.com