

# Sony Pictures Entertainment (SPE)

## Global Environmental Management System Manual

Document Control No.: SPE-1000-A4

Page: 1 of 9

Revision Date: 2017-08-08

### 1.0 Global Environmental Management System (GEMS) Manual

The purpose of this Global Environmental Management System (GEMS) Manual is to provide guidance for establishing a GEMS that is implemented, maintained and continuously improved to achieve the intended outcomes. The GEMS takes into consideration all compliance obligations and follows the requirements for registration under BS EN ISO14001 - 2015 Environmental Management Systems standard and Sony Corporation's Global Environmental Management System (GEMS).

### 2.0 GEMS General Requirements

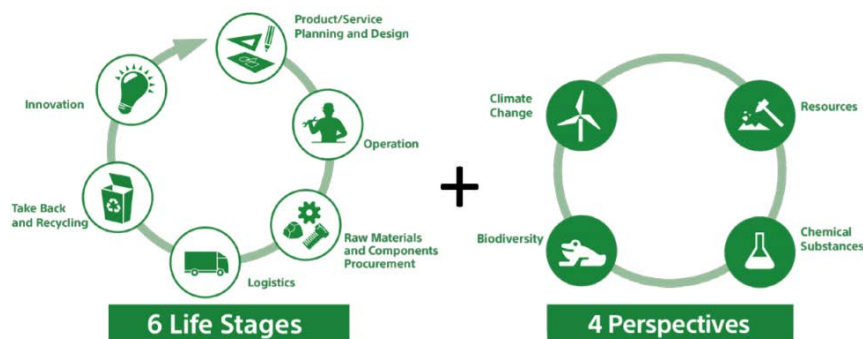
Per Sony Corporation's GEMS-201 the Intended Outcomes of GEMS are the following outcomes that Sony Group is attempting to achieve through the operation of GEMS:

- Improve the environmental performance of business activities;
- Meet Compliance Obligations; and
- Achieve environmental targets based on the Sony Group's environmental policy.

### 2.1 Context of the Organization

Sony Pictures Entertainment (SPE) is a subsidiary of Tokyo-based Sony Corporation (Sony). Sony's Global Environmental Management System (GEMS) is a globally consolidated management system based on the ISO14001 standard. Sony established this system to realize Sony's Group Environmental Vision, achieve Green Management targets, and ensure compliance with relevant obligations.

Sony promotes environmental activities based on the "Road to Zero" environmental plan, which aims for a zero-environmental footprint throughout the life cycle of products and business activities. Road to Zero sets a series of specific goals or Green Management targets based on four environmental perspectives (aspects), and six product life cycle stages.



### 2.2 GEMS Scope

Per Sony Corporation's GEMS-201 each BU and Site shall determine the scope of its GEMS within its organization according to the characteristics of its business. SPE's GEMS scope and the scope for SPE sites shall be determined by taking into consideration:

- Scope of Sony's GEMS defined by GEMS-603.
- External & internal issues as defined in SPE-1010
- Compliance obligations as defined in SPE-1010
- Interested parties needs and expectations as defined in SPE-1010
- Product life cycle of products and business activities

# Sony Pictures Entertainment (SPE)

## Global Environmental Management System Manual

Document Control No.: SPE-1000-A4  
 Page: 2 of 9  
 Revision Date: 2017-08-08

- Organizational and physical boundaries
- Degree of control over business and outsourced processes.

SPE's and SPE sites GEMS Scope is documented in Appendix SPE-001 and the ISO 14001 certificate found at [SPE GEMS Share-point](#).

SPE sites and other operations not included in the ISO 14001 certification shall follow SPE's Global Environmental policy but are exempt from the scope of SPE's GEMS.

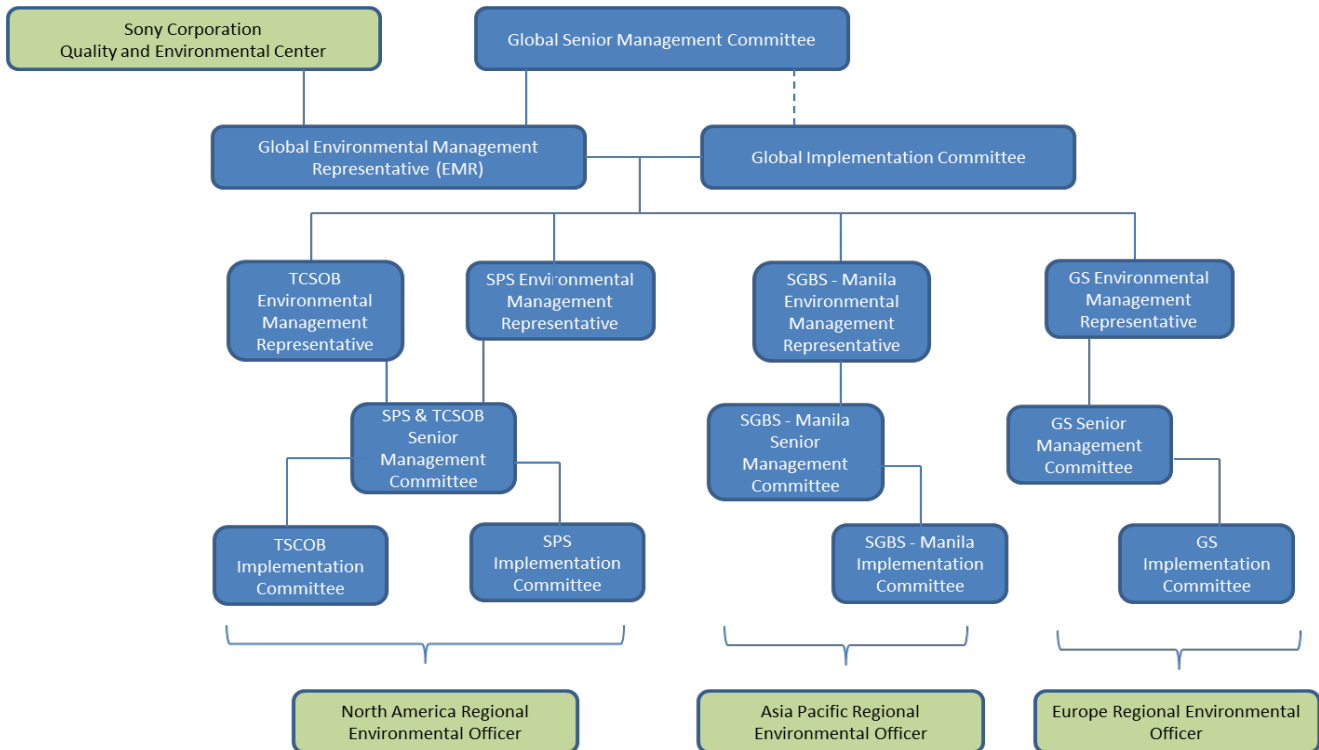
### 2.3 SPE Environmental Policy

Top management shall establish, implement and maintain an environmental policy for SPE's defined scope. SPE's environmental policy is documented in Appendix SPE-004 found at [SPE GEMS Share-point](#).

### 2.4 GEMS Structure

Top management shall take accountability for the effectiveness of the GEMS ensuring integration of the GEMS to business activities, providing required resources, and supporting those who manage the GEMS.

**Global EMS Organization Chart**



# Sony Pictures Entertainment (SPE)

## Global Environmental Management System Manual

Document Control No.: SPE-1000-A4

Page: 3 of 9

Revision Date: 2017-08-08

### *Global EMS Management Committee:*

Comprised of a global facilities representative, global P&O representative, global procurement representative, Environmental, Health and Safety (EHS) regional representatives, head of sustainability department, and SPE Global EMR. For a complete list see Appendix SPE-002.

*Global EMS Implementation Committee:* Comprised of site EMRs and EHS regional representatives. For a complete list see Appendix SPE-001.

*Site EMS Management Committee:* Comprised of facilities representative (if available), P&O representative (if available), EHS regional representatives (if available), site EMR and at least one management representative. For a complete list see Appendix SPE-001.

*Site EMS Implementation Committee:* Comprised of the site's EMR, facilities representatives (if available), stage operations (if applicable), EHS regional representatives and others involved in the implementation of the GEMS. For a complete list see Appendix SPE-001.

### 2.4.1 Roles and responsibilities

Roles and responsibilities of the Global EMS are described in the table below. These roles and responsibilities are defined to ensure proper implementation and maintenance of the GEMS.

Role	Responsibilities
<b>Global EMS Management Committee</b>	<ol style="list-style-type: none"> <li>1. Ensure executive team is aware of the GEMS, environmental policy and intended outcomes.</li> <li>2. Ensure GEMS continuing suitability, adequacy and effectiveness by participating actively at Management Review meetings and providing suggestions for improvements, required changes and direction.</li> <li>3. Ensure the environmental policy and the environmental objectives are compatible with the strategic direction and the context of the organization.</li> <li>4. Ensure appropriate resources and budget are allocated within the business plans for the implementation of GEMS.</li> <li>5. Ensure adequate manpower and resources are allocated to establish, implement and maintain the GEMS.</li> <li>6. Delegate to Global EMR the responsibility to establish and maintain the GEMS complying with ISO 14001 Standard.</li> </ol>
<b>Global EMS Implementation Committee</b>	<ol style="list-style-type: none"> <li>1. Responsible for the effective implementation and continual improvement of the GEMS.</li> <li>2. Review and update as needed GEMS global documentation, including forms, posters, templates and any other tools.</li> <li>3. Establish global objectives and targets.</li> <li>4. Share best practices, internal and external audit findings, and environmental activities among sites in the program.</li> <li>5. Review corrective and preventive action plans with each site (Twice a year).</li> <li>6. Coordinate communications and actions at both committee and global levels, as appropriate.</li> </ol>
<b>Global EMR</b>	<ol style="list-style-type: none"> <li>1. Primary GEMS contact with Sony Environmental Center related to GEMS information.</li> <li>2. Gain knowledge on the Sony's GEMS to integrate SPE GEMS to it.</li> <li>3. Review, approve and maintain documentation for the Global SPE EMS.</li> </ol>

# Sony Pictures Entertainment (SPE)

## Global Environmental Management System Manual

Document Control No.: SPE-1000-A4

Page: 4 of 9

Revision Date: 2017-08-08

	<ol style="list-style-type: none"> <li>4. Oversee and provide consistent direction to the site EMRs.</li> <li>5. Schedule and conduct Global Management Review meeting.</li> <li>6. Schedule Global implementation committee meetings.</li> <li>7. Act as a Coordinator for the Document Control System for GEMS documentation.</li> </ol>
<b>Site EMS Management Committee</b>	<ol style="list-style-type: none"> <li>1. Ensure EMS continuing suitability, adequacy and effectiveness by participating actively at Management Review meetings and providing suggestions for improvements, required changes and directions if any.</li> <li>2. Ensure the environmental objectives are compatible with the strategic direction and the context of the site.</li> <li>3. Ensure appropriate resources and budget are allocated within the site's business plans for the implementation of EMS.</li> <li>4. Ensure adequate manpower and resources are allocated to establish, implement and maintain the EMS.</li> <li>5. Delegate to EMR the responsibility to establish and maintain the EMS in compliance with ISO 14001 Standard.</li> </ol>
<b>Site Implementation Committee</b>	<ol style="list-style-type: none"> <li>1. Responsible for the effective implementation and continual improvement of the site's EMS.</li> <li>2. Implement plans and activities created in Global EMS committee meetings.</li> <li>3. Review EMS site's documentation.</li> <li>4. Set, review, and approve site's objectives and targets.</li> <li>5. Review site internal and external audit findings and effectiveness of corrective/preventative actions.</li> <li>6. Coordinate communications and actions at site levels, as appropriate.</li> <li>7. Ensure that any outside contractors/temporary staff members are aware of the EMS, SPE's Environmental Policy and related EMS Procedures.</li> </ol>
<b>Site EMR</b>	<ol style="list-style-type: none"> <li>1. Coordinate the development of the EMS including the completion of required EMS forms, logs, records and site-specific procedures.</li> <li>2. Act as a Coordinator for the site's Document Control System.</li> <li>3. Coordinate communications, training, and actions at site level. This may include organizing of committee meetings, scheduling management review meetings, setting trainings, etc.</li> <li>4. Disseminate information from Global and site EMS implementation committees to their respective areas of operations.</li> <li>5. Ensure collection of applicable environmental data required by GEMS, and report to Corporate Quality and Environmental Division (QED) using GRIDS database.</li> <li>6. Creation and submittal of Sony required plans including Green Star Program, Business plan, mid-range plan, and any other requests.</li> <li>7. Monitor site's environmental performance and objectives &amp; targets progress.</li> <li>8. Each Site EMR has the primary responsibility of overseeing the day-to-day environmental activities that include, but are not limited to:             <ul style="list-style-type: none"> <li>• Compliance obligations</li> <li>• Hazardous materials management (If required)</li> <li>• Energy management program</li> <li>• Waste management</li> <li>• Pollution prevention initiatives/programs</li> </ul> </li> <li>9. Upload current Level IV forms and other EMS documentation in the <a href="#">SPE GEMS Share-point</a>.             <ul style="list-style-type: none"> <li>• Level IV Documents: Environmental Aspects and Impacts; Objectives and Targets Log, Legal and Other Requirements Matrix &amp; Corrective Action</li> </ul> </li> </ol>

# Sony Pictures Entertainment (SPE)

## Global Environmental Management System Manual

Document Control No.: SPE-1000-A4

Page: 5 of 9

Revision Date: 2017-08-08

	<p>Plan</p> <ul style="list-style-type: none"><li>• EMS Documentation: Environmental Data, Implementation Committee Meeting Minutes &amp; Management Review Meeting Minutes</li></ul> <p>10. Promote environmental, health and safety awareness at their sites.</p> <p>11. At any time that a significant business change or significant compliance issue is encountered, site EMR shall notify the Global EMR and if necessary a senior management representative.</p>
<b>Employees</b>	<ol style="list-style-type: none"><li>1. Adhere to the SPE's Environmental Policy and GEMS Procedures.</li><li>2. Provide full support in the implementation and maintenance of GEMS activities.</li><li>3. Participate in activities that assist SPE in meeting or exceeding the site objectives and targets.</li><li>4. Suggest improvements to the GEMS committee members where appropriate, including suggestions on environmental aspects, objectives and targets, etc.</li><li>5. Department Heads at SPE are responsible for the identification of appropriate personnel who are responsible and accountable for the implementation of the GEMS.</li><li>6. Assist in preparing GEMS documentation if appointed.</li></ol>
<b>Regional Environmental Officer (REO)</b>	<ol style="list-style-type: none"><li>1. Provide assistance with local operation of individual sites and site audits.</li><li>2. If available at the regional level, the REO group shall keep SPE sites informed of legal and regulatory information on a regular basis.</li></ol>

# Sony Pictures Entertainment (SPE)

## Global Environmental Management System Manual

Document Control No.: SPE-1000-A4

Page: 6 of 9

Revision Date: 2017-08-08

### 2.5 GEMS Documentation

#### 2.5.1 GEMS Documentation Distribution

The Global Environmental Management Representative (EMR) shall ensure that this manual and all other GEMS documents are controlled, maintained and available to all applicable sites via the MySPE Intranet ([MySPE Sustainability](#)) and the SPE EMS share-point ([SPE GEMS Share-point](#)).

#### 2.5.2 GEMS Documentation Levels

The SPE GEMS is maintained in four levels of documentation and is interconnected with Sony's GEMS documents.

- *Level I (1000)*: The core elements of SPE's GEMS are documented in the GEMS Manual. The manual addresses the overall structure of the GEMS, sets roles and responsibilities and provides appropriate direction to related documentation. The manual includes a list of how specific clauses of the standard are covered by different levels of EMS documentation.
- *Level II (Series 1000)*: Global ISO 14001 operational procedures. Each procedure documents the way each part of the GEMS is implemented and maintained.
- *Level III (Per site documentation)*: Specific procedures for the sites are documented in Country/Site Procedures. These are internal and external supporting documents including but not limited to, required health, safety and environmental procedures, work Instructions, specifications and guidelines, etc.
- *Level IV (SPEF-SiteAbreviation-XXX)*: Forms, logs, reports, and records are considered level IV documents.

Document Control Number	Description	Responsible Party	ISO 14001 Standard
<b>Level I Environmental Management System Manual</b>			
SPE 1000	Environmental management System Manual	Global SPE EMR	4.0 Context of the organization 4.3 Determining the scope of the environmental management system 4.4 Environmental Management System  5.0 Leadership 5.1 Leadership and Commitment 5.2 Environmental policy 5.3 Organizational roles, responsibilities and authorities  7 Support 7.1 Resources
	- EMS Scope		
	- Environmental Policy		
	- EMS Structure		
	Appendix SPE-001 SPE EMS Scope		
	Appendix SPE-002 SPE Senior Management Committee		
	Appendix SPE-003 SPE EMS Internal Auditors		
<b>Level II Environmental Management System Procedures</b>			

# Sony Pictures Entertainment (SPE)

## Global Environmental Management System Manual

Document Control No.: SPE-1000-A4

Page: 7 of 9

Revision Date: 2017-08-08

SPE-1010	<p>Planning</p> <ul style="list-style-type: none"> <li>- Internal and external issues</li> <li>- Interested parties and their needs and expectations</li> <li>- Compliance Requirements Environmental Aspects and Impacts</li> <li>- Environmental Objectives</li> </ul>	Global SPE EMR	<p>4 Context of the organization</p> <p>4.1 Understanding the organization and its context</p> <p>4.2 Understanding the needs and expectations of interested parties</p> <p>6 Planning</p> <p>6.1 Actions to address risks and opportunities</p> <p>6.1.1 General</p> <p>6.1.2 Environmental Aspects</p> <p>6.1.3 Compliance Obligations</p> <p>6.1.4 Planning action</p> <p>6.2 Environmental objectives and planning to achieve them</p> <p>6.2.1 Environmental Objectives</p> <p>6.2.2 Planning actions to achieve environmental objectives</p> <p>8 Operation</p> <p>8.1 Operational Planning and Control</p>
SPE-1020	<p>Checking</p> <ul style="list-style-type: none"> <li>- Monitoring and Measurement</li> <li>- Evaluation of Compliance</li> </ul>	Global SPE EMR	<p>9 Performance evaluation</p> <p>9.1 Monitoring, Measurement, analysis and evaluation</p> <p>9.1.1 General</p> <p>9.1.2 Evaluation of Compliance</p>
SPE-1030	Communication	Global SPE EMR	<p>7 Support</p> <p>7.4 Communication</p> <p>7.4.1 General</p> <p>7.4.2 Internal Communication</p> <p>7.4.3 External Communication</p>
SPE-1040	Competence, Training and awareness	Global SPE EMR	<p>7 Support</p> <p>7.2 Competence</p> <p>7.3 Awareness</p>
SPE Global Crisis Management Program ( <a href="#">Global Crisis Management</a> )		Exec Dir Fire Prevention & Life Safety	<p>8 Operation</p> <p>8.2 Emergency Preparedness and response</p>
SPE-1060	<p>Audits and Management Review</p> <ul style="list-style-type: none"> <li>- Internal Audit</li> <li>- Management Review</li> </ul>	Global SPE EMR	<p>9 Performance evaluation</p> <p>9.2 Internal Audit</p> <p>9.2.1 General</p> <p>9.2.2 Internal Audit</p> <p>9.3 Management Review</p>
SPE-1070	Nonconformity, Corrective Action & Preventive Action	Global SPE EMR	<p>10 Improvement</p> <p>10.1 General</p> <p>10.2 Non-Conformity and Corrective Action</p>

# Sony Pictures Entertainment (SPE)

## Global Environmental Management System Manual

Document Control No.: SPE-1000-A4

Page: 8 of 9

Revision Date: 2017-08-08

			10.3 Continual improvement
SPE-1080	Document Control - Control of documents - Control of records	Global SPE EMR	7 Support 7.5 Documented information 7.5.1 General 7.5.2 Creating and updating 7.5.3 Control of documented information
<b>Level III Site Environmental Procedures / Work Instructions</b>			
	If required by site operations e.g. air emissions, waste management, energy conservation, water discharge...	Site EMR	Legal, corporate, EMS and other requirements
<b>Level IV Site Forms</b>			
SPEF-001	Environmental Aspects and Impacts	Global SPE EMR (Create/Update templates)  Site EMR (Complete site information and update form)	
SPEF-002	Objectives & Targets Log		
SPEF-003	Compliance Obligations		
SPEF-004	Internal Audit		
SPEF-005	Non-conformity and Corrective Action Plan		



# Sony Pictures Entertainment (SPE)

## Global Environmental Management System Manual

Document Control No.: SPE-1000-A4  
Page: 9 of 9  
Revision Date: 2017-08-08

### Revision History

Doc. Control #	Date	Page	Item
SPE-1000-A1	2016-07-13	2	Added procurement external website
SPE-1000-A2	2016-07-13	8	Updated Global Crisis Management Share Point link
SPE-1000-A3	2017-03-31	All	Revised to comply with ISO 14001:2015
SPE-1000-A4	2017-08-08	All	Updated Roles and Responsibilities Change name to "Global Environmental Management System Manual"