

Title: Contractor Safety and GEMS Program      Doc. Control #: SPE-6065-A6  
 Contact Person/Department: Sherrie Walters, SPE EHS      Revision Date: 03/13/2018

**Revision History**

Doc. Control #	Date	Item
SPE-6065A0	7/28/06	Revised 1.1 Purpose to reflect governmental, regulatory and ISO requirements
SPE-6065A0	7/28/06	Revised 2.0 Policy for clarification
SPE-6065A0	7/28/06	Revised 4.0 Procedures for clarification
SPE-6065A0	7/28/06	Revised 5.2 to prohibit the pouring of chemicals anywhere
SPE-6065A0	7/28/06	Revised 7.0 Risk Management for clarification
SPE-6065A1	7/21/08	Revised Contact Person/Dept.
SPE-6065A1	7/21/08	Reformatted text
SPE-6065A2	9/21/09	Revised 3.0 to include Corporate Pointe
SPE-6065A2	9/21/09	Revised 8.1 to include SPE-6162 and SPE-6180
SPE-6065A3	11/29/10	Revised 8.1 to include SPE-6190 and text regarding initial notification.
SPE-6065A4	11/29/10	Revised Section 8.0 to update ISO14001
SPE-6065A5	05/20/15	Reformatted procedure format Changed procedure contact to Angela Ballesteros Changed scope, responsibilities, training, and documentation Removed specific program requirements
SPE-6065A6	07/06/16	Changed scope and responsibilities (standardized in all EHS procedures) Added Regulatory Authority (GEMS) Added "contractor" definition
SPE-6065A7	03/12/18	Changed Corporate Safety and Environmental Affairs (CSEA) for Environmental, Health and Safety (EHS). Updated contact information.

## 1.0 SCOPE

- 1.1 This procedure applies to all Sony Pictures Entertainment (SPE) staff working at SPE corporate facilities, regional offices and other sites located in the U.S.
- 1.2 This procedure applies to all routine and non-routine activities and equipment during regular, abnormal and emergency operations.

## 2.0 PURPOSE

- 2.1 The purpose of this document is to outline the Environmental, Health and Safety responsibilities of contractors, subcontractors and vendors performing work at SPE facilities.

## 3.0 REGULATORY AUTHORITY

- 3.1 SPE has established and implemented a global environmental management system (GEMS) that complies with the requirements of EN ISO 14001:2015 for the activities detailed in the scope of the registration. Contractors, subcontractors and vendors must be aware and must comply with SPE's environmental policy and ISO 14001 program requirements in the performance of Services. SPE's environmental policy and GEMS program details can be found at <http://supplier.spe.sony.com>.

## 4.0 RESPONSIBILITIES

- 4.1. SPE's Environmental, Health and Safety (EHS) group is responsible for advising SPE employees on all issues relating to Environmental, Health and Safety regulatory compliance at U.S. locations.
- 4.2. Departmental level management (supervisors, foremen, etc.) is responsible for ensuring that all employees understand and comply with the provisions of all Environmental, Health and Safety procedures.
- 4.3. SPE employees are responsible for complying with all Environmental, Health and Safety procedures.
- 4.4. Third party contractors and vendors working on site are responsible for implementing their own Environmental, Health and Safety procedures and must also adhere to the requirements of the SPE-6065 Contractor Safety and EMS Program.

## 5.0 DEFINITIONS

Contractors – Any non-Sony entity performing work on SPE property or facilities, including personnel employed directly by the contractor, or those subcontracted to do work on behalf of the contractor.

## 6.0 GENERAL REQUIREMENTS

- 6.1 Contractors performing work on behalf of SPE must comply with all federal, state, municipal, county and local Environmental, Health and Safety laws, rules, codes, standards, and regulations applicable to its Services. Contractor is solely responsible for its Personnel's compliance with the Environmental, Health and Safety Rules.
- 6.2 Contractors must comply with internal policies as provided by SPE's Environmental, Health and Safety (EHS) group.
- 6.3 A SPE single point-of-contact must coordinate and closely monitor each contractor's compliance performance. It is the responsibility of all SPE personnel including all departments and divisions of SPE and its affiliates (facilities and building management, purchasing, engineering, etc.) to refer violations to SPE's Environmental, Health and Safety (EHS) group.

- 6.4 Contractors who do not act reasonably to comply with the requirements of this program may be asked to leave the site immediately, and may have their contract terminated.
- 6.5 Contractors may not use SPE equipment. Contractor provided equipment including heavy equipment, industrial vehicles, and personnel lifting equipment used on SPE property must be used in a safe manner and must be in acceptable working condition.
- 6.6 Contractors must familiarize themselves with evacuation routes, alarms and emergency equipment (fire extinguisher, eyewash, etc.) and must follow all emergency procedures.
- 6.7 Contractors will notify SPE's EHS, Fire / Life Safety and the SPE single point-of-contact prior to starting work involving any of the following:
- Shutting down any portion of the fire protection system (sprinkler, fire suppression, or smoke detection systems);
  - Modifying, deactivating, or shutting down any controls or building monitoring system, including gas monitoring;
  - Disconnecting, removing, or stripping out any utilities including gas, chemical waste exhaust duct, and chemical dispensing lines;
  - Work involving solvents or any other smoke/odor-producing operations;
  - Entering any permit-required confined space;
  - Entering any alarmed area;
  - Working on any building ventilation system;
  - Saw cutting, coring, or chipping concrete;
  - Using or moving any chemicals or chemical containers;
  - Accessing roof or attic areas;
  - Removing asbestos materials, including VAT (vinyl asbestos tile).
  - Hot Work (welding, cutting, etc.);
  - Overhead lifting with crane or helicopter.
  - Excavation of any type;
  - Accessing working areas at heights;
  - Erection and / or use of scaffolds;
  - Generating hazardous waste.
- 6.8 Contractors may be required to provide a copy of their Environmental, Health and Safety programs to SPE for validation. These programs may include, but are not limited to, lockout/tagout, confined space, elevated work safety, excavation, hot work, hazard communication, and respiratory protection.

## 7.0 TRAINING REQUIREMENTS

## 8.0 DOCUMENTATION AND RECORDKEEPING