

<b>Document Title:</b>	Global Environmental Management System Manual	<b>Doc. Control #:</b>	SPE-E-1005
<b>Contact Person/Dept:</b>	Charlie Hernandez, EHS Manager	<b>Revision Date:</b>	8/15/2022

## 1.0 Global Environmental Management System Manual

The purpose of this SPE's Global Environmental Management System (SPE GEMS) Manual is to provide guidance for establishing an environmental management system that is implemented, maintained and continuously improved to achieve the intended outcomes. SPE's 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 (Sony GEMS). Sony Corporate GEMS documents outlines requirements for applicable sites. Sony Pictures GEMS documents can be located on [here](#).

## 2.0 GEMS General Requirements

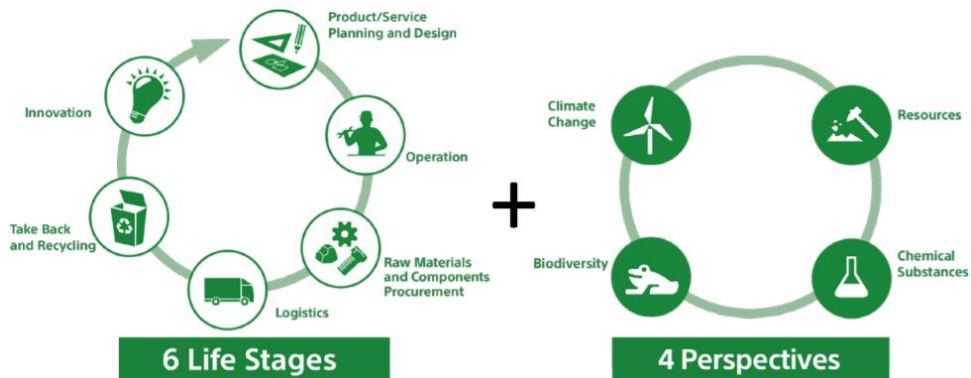
Per Sony GEMS-201, the intended outcomes of SPE GEMS are the following outcomes that Sony is attempting to achieve through the operation of Sony GEMS:

- Improve the environmental performance of business activities
- Meet Compliance Obligations
- Meet SPE's goals
- Achieve environmental targets based on the Sony's environmental policy

## 2.1 Context of the Organization

Sony Pictures Entertainment (SPE) is a subsidiary of Tokyo-based Sony Corporation (Sony). Sony GEMS is a globally consolidated management system based on the ISO14001 standard for Sony's global companies. Sony established this system to realize Sony's 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 GEMS-201 each Business Unit and Site shall determine the scope of its environmental management system within its organization according to the characteristics of its business. SPE GEMS scope and the scope for SPE sites shall be determined by taking into consideration:

- Scope of Sony's GEMS
- External & internal issues

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- Compliance obligations
- Interested parties needs and expectations
- Product life cycle of products and business activities
- Organizational and physical boundaries
- Degree of control over business and outsourced processes
- Environmental aspects and impacts
- External and Internal issues

SPE’s and SPE sites GEMS Scope is documented in SPE-C-1001 SPE GEMS and OHS Scope and the ISO 14001 certificate found [here](#).

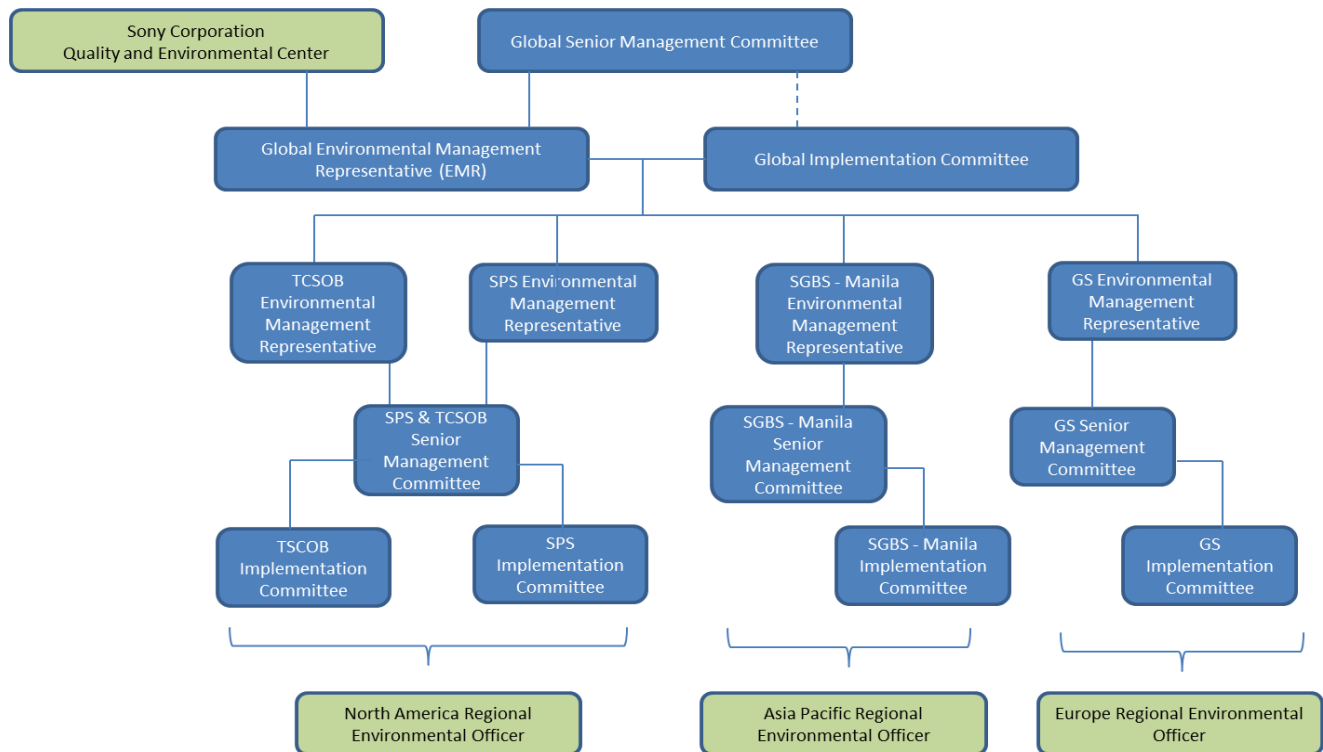
SPE sites not included in the ISO 14001 certification shall follow SPE’s Environmental policy but are exempt from the scope of SPE’s GEMS.

### 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 SPE-E-1004 SPE Environmental Policy found [here](#).

### 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.



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**Global EMS Organization Chart (AB change for Brunel)**

*Global SPE Senior Management Committee:* The committee may comprise of representatives from the following areas: facilities, People & Organization, Procurement, Environmental, Health and Safety (EHS), Sustainability, Information Technology and Site Environmental Management Representative (EMR). For a complete list see SPE-C-1002 SPE Global Senior Management.

*Global EMS Implementation Committee:* The committee comprises of site EMRs. For a complete list see SPE-C-1001 SPE GEMS and OHS Scope.

*Site EMS Management Committee:* The committee may comprise of representatives from the following areas: Facilities, People & Organization, EHS, site EMR, Procurement, Information Technology and management representative. Sites will develop committees that represent their operation and best addresses their needs. For a complete list see SPE-C-1001 SPE GEMS and OHS Scope.

*Site EMS Implementation Committee:* The committee may comprise of representatives from the following areas: site EMR, Facilities, Stage Operations (if applicable), EHS, and others involved in the implementation of the GEMS. Sites will develop committees that represent their operation and best addresses their needs. For a complete list see SPE-C-1001 SPE GEMS and OHS Scope.

**2.4.1 Roles and Responsibilities**

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

<b>Role</b>	<b>Responsibilities</b>
<b>Global SPE Senior Management Committee</b>	<ol style="list-style-type: none"> <li>1. Aware of SPE GEMS, environmental policy and intended outcomes.</li> <li>2. Ensure SPE GEMS 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 SPE GEMS.</li> <li>5. Ensure adequate manpower and resources are allocated to establish, implement and maintain SPE GEMS.</li> <li>6. Delegate to Global EMR the responsibility to establish and maintain SPE GEMS complying with ISO 14001 Standard.</li> </ol>
<b>Global EMS Implementation Committee</b>	<ol style="list-style-type: none"> <li>1. Ensure the effective implementation and continual improvement of the SPE GEMS.</li> <li>2. Review and update SPE GEMS documented information, including forms, posters, templates and any other tools (as needed).</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.</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 contact for SPE GEMS information.</li> </ol>

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	<ol style="list-style-type: none"> <li>2. Integrate Sony GEMS guidance into SPE GEMS.</li> <li>3. Review, approve and maintain documented information for SPE GEMS.</li> <li>4. Oversee and provide consistent direction to site EMRs.</li> <li>5. Schedule and conduct Global Management Review meeting.</li> <li>6. Schedule Global implementation committee or site meetings.</li> <li>7. Primary administrator of the Document Control System for SPE GEMS documented information.</li> </ol>
<b>Site EMS Management Committee</b>	<ol style="list-style-type: none"> <li>1. Ensure SPE GEMS 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 within 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 SPE GEMS.</li> <li>4. Ensure adequate manpower and resources are allocated to establish, implement and maintain the SPE GEMS.</li> <li>5. Delegate to site EMR the responsibility to establish and maintain the SPE GEMS 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 SPE GEMS at a site level.</li> <li>2. Implement plans and activities created in Global EMS committee meetings (if applicable).</li> <li>3. Review site's SPE GEMS documented information and forms.</li> <li>4. Set, review, and approve site's objectives and targets.</li> <li>5. Review site's internal and external audit findings and effectiveness of corrective/preventative actions.</li> <li>6. Coordinate communications and actions at site level, as appropriate.</li> <li>7. Ensure that any outside contractors/temporary staff members are aware of SPE GEMS, 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 SPE GEMS including the completion of required 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, trainings, 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 Implementation Committees to their respective areas of operations.</li> <li>5. Ensure collection of applicable environmental data required by Sony GEMS, and report to Corporate Quality and Environmental Division (QED) using SIRS database.</li> <li>6. Submit Sony GEMS required plans including Business Plan and Mid-Range Plan (if applicable).</li> <li>7. Monitor site's environmental performance and objectives &amp; targets progress.</li> <li>8. Oversee 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> </ul> </li> </ol>

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	<ul style="list-style-type: none"> <li>• Energy management program</li> <li>• Waste management</li> <li>• Pollution prevention initiatives/programs</li> </ul> <p>9. Upload current Level IV forms and other SPE GEMS documented information in the <a href="#">SPE GEMS SharePoint</a>.</p> <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 Plan</li> <li>• Other Documented Information: 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 Environmental Policy and SPE GEMS Procedures.</li> <li>2. Provide full support in the implementation and maintenance of SPE 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 SPE GEMS committee members where appropriate, including suggestions on environmental aspects, objectives and targets, etc.</li> <li>5. Assist in preparing SPE GEMS documented information 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>

## 2.5 SPE GEMS Documented Information Distribution

The Global EMR shall ensure that this manual and all other SPE GEMS documents are controlled, maintained and available to all applicable sites via MySPE Intranet and the SPE EMS share-point). Sony GEMS documents can be located [here](#).

### 2.5.1 SPE GEMS Documented Information Levels

SPE GEMS is maintained in four levels of documented information and is interconnected with Sony GEMS documents.

- Level 1: Level 1 documents illustrate the core elements of SPE GEMS. The GEMS manual addresses the overall structure of SPE GEMS, sets roles and responsibilities and provides appropriate direction to related documented information. The manual includes a list of how specific clauses of the standard are addressed by within SPE GEMS documented information.
- Level II: Level II documents are SPE GEMS operational procedures. Each procedure documents the methods SPE GEMS is implemented and maintained.
- Level III: Level III documents are site specific procedures. Documented information may include internal and external supporting documents like health, safety and environmental procedures, work Instructions, specifications and guidelines.
- Level IV: Level IV documented information are forms, logs, reports, and records used for implementing SPE GEMS.

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<b>Document Control Number</b>	<b>Description</b>	<b>Responsible Party</b>	<b>ISO 14001 Standard</b>
<b>Level I Environmental Management System Manual</b>			
SPE 1000	Environmental management System Manual - EMS Scope - Environmental Policy - EMS Structure - EMS Documented information	Global SPE EMR	4.0 Context of the organization 4.3 Determining the scope of the environmental management system 4.4 Environmental Management System
	SPE-C-1001 SPE GEMS and OHS Scope		5.0 Leadership 5.1 Leadership and Commitment
	SPE-C-1002 SPE Global Senior Management Committee		5.2 Environmental policy 5.3 Organizational roles, responsibilities and authorities
	SPE-C-1004 SPE Environmental Policy		7.0 Support 7.1 Resources
<b>Level II Environmental Management System Procedures</b>			
SPE-C-1006	Planning - Internal and external issues - Interested parties and their needs and expectations - Compliance Requirements Environmental Aspects and Impacts - Environmental Objectives	Global SPE EMR	4.0 Context of the organization 4.1 Understanding the organization and its context 4.2 Understanding the needs and expectations of interested parties  6.0 Planning 6.1 Actions to address risks and opportunities 6.1.1 General 6.1.2 Environmental Aspects 6.1.3 Compliance Obligations 6.1.4 Planning action 6.2 Environmental objectives and planning to achieve them 6.2.1 Environmental Objectives 6.2.2 Planning actions to achieve environmental objectives  8.0 Operation 8.1 Operational Planning and Control

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SPE-C-1007	Performance Evaluation - Monitoring and Measurement - Evaluation of Compliance	Global SPE EMR	9.0 Performance evaluation 9.1 Monitoring, Measurement, analysis and evaluation 9.1.1 General 9.1.2 Evaluation of Compliance
SPS-C-0005-FY22	Communication	Global SPE EMR	7.0 Support 7.4 Communication 7.4.1 General 7.4.2 Internal Communication 7.4.3 External Communication
SPE-C-1008	Competence and Awareness	Global SPE EMR	7.0 Support 7.2 Competence 7.3 Awareness
SPE Global Crisis Management Program		Exec Dir Fire Prevention & Life Safety	8.0 Operation 8.2 Emergency Preparedness and response
SPE-C-1009	Audits and Management Review - Internal Audit - Management Review	Global SPE EMR	9.0 Performance evaluation 9.2 Internal Audit 9.2.1 General 9.2.2 Internal Audit 9.3 Management Review
SPE-C-1010	Nonconformity and Corrective Action	Global SPE EMR	10.0 Improvement 10.1 General 10.2 Non-Conformity and Corrective Action 10.3 Continual improvement
SPE-C-1011	Document Control - Control of documents - Control of records	Global SPE EMR	7.0 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>			
SPS-E-0001-FY22	Environmental Aspects and Impacts	Global SPE EMR (Create/Update templates)	
SPS-C-0001-FY22	Objectives & Targets		
SPS-C-0002-FY22	Compliance Obligations	Site EMR (Complete site information)	
SPS-C-0003-FY22	Internal Audit		

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SPS-C-0004-FY22	Non-conformity and Corrective Action Plan	and update form)	
SPS-C-0005-FY22	Communication Log		
SPS-C-0006-FY22	Training Matrix		



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## Revision History

<b>Doc. Control #</b>	<b>Date</b>	<b>Page</b>	<b>Item</b>
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"
SPE-1000-A5	2018-08-15	9	Added Communication Log to site forms. Removed list of auditors.
SPE-1000-A6	2018-09-05	10	Differentiated "SPE GEMS" from "Sony GEMS". Added Sony GEMS document location / share-point
SPE-1000-A7	2018-10-05	All	Updated document names. Updated weblink for Sony GEMS documents.
SPE-1000-A8	2021-01-24	All	Update Links throughout document
SPE-E-1005	2022-08-15	All	Updated document control numbers and links