

<b>Document Title:</b>	Occupational Health and Safety Manual	<b>Doc. Control #:</b>	SPE-S-1005
<b>Contact Person/Dept:</b>	Stephania Avellaneda Zavala, Sr. EHS Manager	<b>Revision Date:</b>	10/21/2022

## 1.0 Purpose Occupational Health & Safety Management System Manual

The Sony Pictures Studios recognizes that occupational health and safety is an integral part of all business and operates to secure a safe and healthy working environment for its employees. It built the Sony Occupational Health and Safety Management System (hereinafter referred to as “Sony OHSMS”) for the purpose of meeting the following conditions:

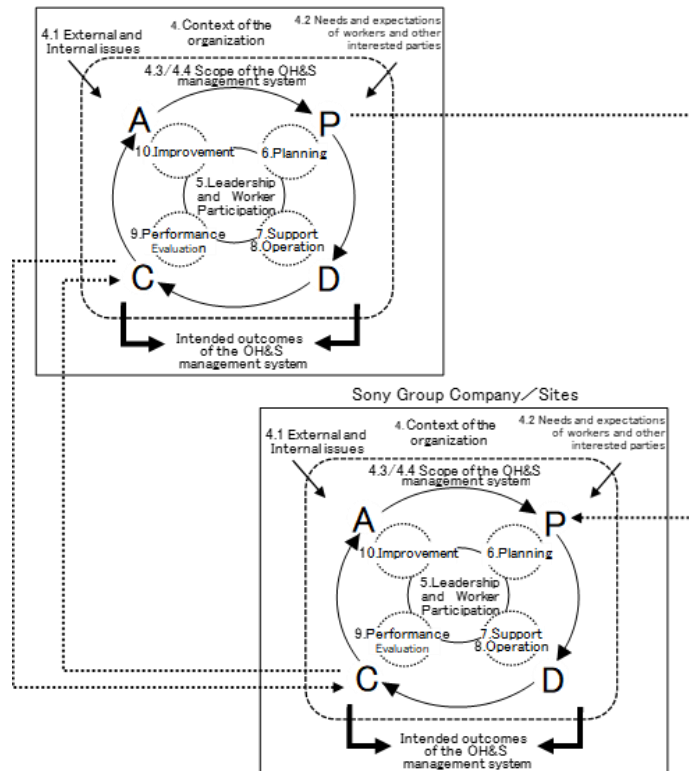
- Provision of a framework for managing OH&S risks and opportunities
- Prevention of work-related injuries and ill health(illness) of workers
- Improvement of OH&S performance

## 2.0 Plan-Do-Check-Act cycle

The OH&S management system approach applied in this document is founded on the concept of Plan-Do-Check-Act (PDCA). The PDCA concept is an iterative process used by organizations to achieve continual improvement. It can be applied to a management system and to each of its individual elements, as follows:

- Plan: determine and assess OH&S risks, OH&S opportunities and other risks and other opportunities, establish OH&S objectives and processes necessary to deliver results in accordance with the organization’s OH&S policy;
- Do: implement the processes as planned;
- Check: monitor and measure activities and processes with regard to the OH&S policy and OH&S objectives, and report the results;
- Act: take actions to continually improve the OH&S performance to achieve the intended outcomes.

## 2.1 Concept of Sony OHSMS



# Sony Pictures Entertainment

Culver City, CA

<b>Document Title:</b>	Occupational Health and Safety Manual	<b>Doc. Control #:</b>	SPE-S-1005
<b>Contact Person/Dept:</b>	Stephania Avellaneda Zavala, Sr. EHS Manager	<b>Revision Date:</b>	10/21/2022

Sony OHSMS consists of a PDCA management cycle for the HQ OH&S Office and Regional Safety Offices and the PDCA management cycle for each Sony Group company and Site. These management cycles are closely interrelated as follows:

- Each Sony Group company or Site shall create plans based on the plans of the HQ OH&S Office and Regional Safety Offices.
- Considering the results of checks at each Sony Group company and Site, the checks of the HQ OH&S Office and Regional Safety Offices shall implement the Check for the entire Sony Group.
- The HQ OH&S Office and Regional Safety Offices shall monitor the status of the following items through corporate audits and OH&S performance reviews to ensure continual improvement of Sony OHSMS.
  - OHSMS audits, OH&S performance reviews, and legal compliance of each Sony Group company and Site
  - Consistencies between the requirements by the HQ OH&S Office and Regional Safety Offices and the management systems of the Sony Group companies and Sites.

### 3.0 Context of the Organization

The organization shall determine external and internal issues that are relevant to its purpose and that affect its ability to achieve the intended outcome(s) of its OH&S management system.

### 3.1 Understanding the needs and expectations of workers and other interested parties

The organization shall determine:

- the other interested parties, in addition to workers, that are relevant to the OH&S management system.
- the relevant needs and expectations (i.e. requirements) of workers and other interested parties;
- which of these needs and expectations are, or could become, legal requirements and other requirements

### 3.2 Determining the scope of the OH&S management system

The organization shall determine the boundaries and applicability of the occupational health and safety management system, taking into account the following to define the scope of application.

- external and internal issues identified in 4.1
- interested parties, legal and other requirements as identified in 4.2
- the planned or performed work-related activities.
- The OH&S management system shall include the activities, products and services within the organization's control or influence that can impact the organization's OH&S performance.
- The scope of OHSMS application shall be in an available state as documented information.
- Companies covered by the Sony OHSMS and scope of application is specifies "Scope of Sony OHSMS[SR-HQ20101]."

### 3.3 OH&S management system

The organization shall establish, implement, maintain and continually improve an OH&S management system, including the processes needed and their interactions, in accordance with the requirements of this document.

<b>Document Title:</b>	Occupational Health and Safety Manual	<b>Doc. Control #:</b>	SPE-S-1005
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## 4.0 Leadership and worker participation

Top management shall demonstrate leadership and commitment with respect to the OH&S management system by:

- taking overall responsibility and accountability for the prevention of work-related injury and ill health, as well as the provision of safe and healthy workplaces and activities;
- ensuring that the OH&S policy and related OH&S objectives are established and are compatible with the strategic direction of the organization;
- ensuring the integration of the OH&S management system requirements into the organization's business processes;
- ensuring that the resources needed to establish, implement, maintain and improve the OH&S management system are available;
- communicating the importance of effective OH&S management and of conforming to the OH&S
- ensuring that the OH&S management system achieves its intended outcome(s);
- directing and supporting persons to contribute to the effectiveness of the OH&S management system;
- ensuring and promoting continual improvement;
- supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility;
- developing, leading and promoting a culture in the organization that supports the intended outcomes of the OH&S management system;
- protecting workers from reprisals when reporting incidents, hazards, risks and opportunities;
- ensuring the organization establishes and implements a process(es) for consultation and participation of workers;
- supporting the establishment and functioning of health and safety committees
  - NOTE Reference to "business" in this document can be interpreted broadly to mean those activities that are core to the purposes of the organization's existence.

## 4.1 OH&S policy

Top management shall establish, implement and maintain an OH&S policy that:

- includes a commitment to provide safe and healthy working conditions for the prevention of work-related injury and ill health and is appropriate to the purpose, size and context of the organization and to the specific nature of its OH&S risks and OH&S opportunities;
- provides a framework for setting the OH&S objectives;
- includes a commitment to fulfil legal requirements and other requirements;
- includes a commitment to eliminate hazards and reduce OH&S risks;
- includes a commitment to continual improvement of the OH&S management system;
- includes a commitment to consultation and participation of workers, and, where they exist, workers' representatives.

The OH&S policy shall:

- be available as documented information;
- be communicated within the organization;
- be available to interested parties, as appropriate;
- be relevant and appropriate.

# Sony Pictures Entertainment

Culver City, CA

<b>Document Title:</b>	Occupational Health and Safety Manual	<b>Doc. Control #:</b>	SPE-S-1005
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## 4.2 Organizational roles, responsibilities, and authorities

Top management shall ensure that the responsibilities and authorities for relevant roles within the OH&S management system are assigned and communicated at all levels within the organization and maintained as documented information. Workers at each level of the organization shall assume responsibility for those aspects of the OH&S management system over which they have control.

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 Safety Management Representative (SMR). For a complete list see SPE-C-1001.

Global EMS Implementation Committee: The committee comprises of site SMRs. For a complete list see Appendix SPE-C-1002.

Site EMS Management Committee: The committee may comprise of representatives from the following areas: Facilities, People & Organization, EHS, site SMR, 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.

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

<b>Role</b>	<b>Responsibilities</b>
<b>Global SPE Senior Management Committee</b>	<ol style="list-style-type: none"> <li>1. Aware of SPE OHS, occupational health and safety policy and intended outcomes.</li> <li>2. Ensure SPE OHS 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 OHS policy and the OHS 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 OHS.</li> <li>5. Ensure adequate manpower and resources are allocated to establish, implement and maintain SPE OHS.</li> <li>6. Delegate to Global SMR the responsibility to establish and maintain SPE OHS complying with ISO 45001 Standard.</li> </ol>
<b>Global OHS MS Implementation Committee</b>	<ol style="list-style-type: none"> <li>1. Ensure the effective implementation and continual improvement of the SPE OHS.</li> <li>2. Review and update SPE OHS 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 occupational health and safety 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>

# Sony Pictures Entertainment

Culver City, CA

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<b>Contact Person/Dept:</b>	Stephania Avellaneda Zavala, Sr. EHS Manager	<b>Revision Date:</b>	10/21/2022

<b>Global SMR</b>	<ol style="list-style-type: none"> <li>1. Primary contact for SPE OHS information.</li> <li>2. Integrate Sony OHS guidance into SPE OHS.</li> <li>3. Review, approve and maintain documented information for SPEOHS.</li> <li>4. Oversee and provide consistent direction to site SMRs.</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 OHS documented information.</li> </ol>
<b>Site OHS MS Management Committee</b>	<ol style="list-style-type: none"> <li>1. Ensure SPE OHS 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 occupational health and safety 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 OHS.</li> <li>4. Ensure adequate manpower and resources are allocated to establish, implement and maintain the SPE OHS.</li> <li>5. Delegate to site SMR the responsibility to establish and maintain the SPE OHS in compliance with ISO 45001 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 OHS at a site level.</li> <li>2. Implement plans and activities created in Global OHS MS committee meetings (if applicable).</li> <li>3. Review site's SPE OHS 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 OHS, SPE's Occupational Health and Safety Policy and related OHS MS procedures.</li> </ol>
<b>Site SMR</b>	<ol style="list-style-type: none"> <li>1. Coordinate the development of SPE OHS 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 OHS data required by Sony OHS, and report injury and illness data suing SIRS database.</li> <li>6. Submit Sony OHS required plans including Business Plan, and Mid-Range Plan.</li> <li>7. Monitor site's injury and illness performance and objectives &amp; targets progress.</li> <li>8. Oversee the day-to-day occupational health and safety activities.</li> <li>9. Upload current Level IV forms and other SPE OHS documented information in the <a href="#">SPE GEMS SharePoint</a>.</li> </ol>

# Sony Pictures Entertainment

Culver City, CA

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	<ul style="list-style-type: none"> <li>• Level IV Documents: Occupational Health and Safety Risk Assessments; 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 health and safety awareness at their sites. 11. At any time that a significant business change or significant compliance issue is encountered, site SMR shall notify the Global SMR and if necessary, a senior management representative.</p>
<b>Employees</b>	<ol style="list-style-type: none"> <li>1. Adhere to the Occupational Health and Safety Policy and SPE OHS Procedures.</li> <li>2. Provide full support in the implementation and maintenance of SPE OHS 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 OHS committee members where appropriate, including suggestions on risk assessments, objectives and targets, etc.</li> <li>5. Assist in preparing SPE OHS documented information if appointed.</li> </ol>
<b>Regional Safety Officer (SEO)</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 RSO group shall keep SPE sites informed of legal and regulatory information on a regular basis.</li> </ol>

## 5.0 SPE OHS Documented Information Distribution

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

## 5.1 SPE OHS Documented Information Levels

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

- Level I: Level 1 documents illustrate the core elements of SPE OHS. The OHS manual addresses the overall structure of SPE OHS, 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 OHS documented information.
- Level II: Level II documents are SPE OHS operational procedures. Each procedure documents the methods SPE OHS 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 OHS procedures, work Instructions, specifications and guidelines.
- Level IV: Level IV documented information are forms, logs, reports, and records used for implementing SPE OHS.

# Sony Pictures Entertainment

Culver City, CA

<b>Document Title:</b>	Occupational Health and Safety Manual	<b>Doc. Control #:</b>	SPE-S-1005
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Document Control Number	Description	Responsible Party	ISO 45001 Standard
<b>Level I Occupational Health and Safety Management System Manual</b>			
SPE	Occupational Health and Safety Management System Manual - OHSMS Scope - OHS Policy - OHS Structure - OHS Documented information	Global SPE SMR	4.0 Context of the organization 4.3 Determining the scope of the OHS management system 4.4 OHS Management System  5.0 Leadership 5.1 Leadership and Commitment 5.2 OHS policy 5.3 Organizational roles, responsibilities and authorities  7.0 Support 7.1 Resources
	SPE-C-1001 SPE GEMS and OHS Scope		
	SPE-C-1002 SPE Global Senior Management Committee		
	SPE-C-1004 SPE OHS Policy		
<b>Level II Occupational Health and Safety Management System Procedures</b>			
SPE-C-1006	Planning - Internal and external issues - Interested parties and their needs and expectations - Compliance Requirements OHS risk assessments - OHS Objectives	Global SPE SMR	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 OHS Aspects 6.1.3 Compliance Obligations 6.1.4 Planning action 6.2 OHS objectives and planning to achieve them 6.2.1 OHS Objectives 6.2.2 Planning actions to achieve OHS objectives 8.0 Operation 8.1 Operational Planning and Control
SPE-C-1007	Performance Evaluation - Monitoring and Measurement - Evaluation of Compliance	Global SPE SMR	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 SMR	7.0 Support 7.4 Communication 7.4.1 General

# Sony Pictures Entertainment

Culver City, CA

<b>Document Title:</b>	Occupational Health and Safety Manual	<b>Doc. Control #:</b>	SPE-S-1005
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			7.4.2 Internal Communication 7.4.3 External Communication
SPE-1040	Competence and Awareness	Global SPE SMR	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-1008	Audits and Management Review - Internal Audit - Management Review	Global SPE SMR	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 SMR	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 SMR	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 OHS Procedures / Work Instructions</b>			
	If required by site operations e.g. air emissions, waste management, energy conservation, water discharge...	Site SMR	Legal, corporate, EMS and other requirements
<b>Level IV Site Forms</b>			
SPS-S-0001-FY22	OHS Risk Assessments	Global SPE SMR (Create/Update templates)  Site SMR (Complete site information and update form)	
SPS-C-0001-FY22	Objectives & Targets		
SPS-C-0002-FY22	Compliance Obligations		
SPS-C-0003-FY22	Internal Audit		
SPS-C-0004-FY22	Non-conformity and Corrective Action Plan		
SPS-C-0005-FY22	Communication Log		
SPS-C-0006-FY22	Training Matrix		



# Sony Pictures Entertainment

Culver City, CA

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### Revision History

<b>Doc. Control #</b>	<b>Date</b>	<b>Page</b>	<b>Item</b>
SPE-S-1005	10/21/2022	All	Document created