

Sony Pictures Entertainment

Culver City, CA

Document Title:	SPE Workplace Violence Prevention and Response Plan	Doc. Control #:	SPE-3-007-A4.1
Contact Person/Dept:	Alex Epstein / S3 - Business Operations	Revision Date:	July 22, 2024

WORKPLACE VIOLENCE PREVENTION PLAN for SONY PICTURES ENTERTAINMENT

Sony Pictures Entertainment's Workplace Violence Prevention Plan (WVPP) addresses the hazards known to be associated with the four types of workplace violence as defined by [Labor Code \(LC\) section 6401.9](#).

Date of Last Review: July 22, 2024

Date of Last Revision(s): July 22, 2024

DEFINITIONS

Emergency - Unanticipated circumstances that can be life threatening or pose a risk of significant injuries to employees or other persons.

Engineering controls - An aspect of the built space or a device that removes a hazard from the workplace or creates a barrier between the employee and the hazard.

Log - The violent incident log required by LC section 6401.9.

Plan - The workplace violence prevention plan required by LC section 6401.9.

Serious injury or illness - Any injury or illness occurring in a place of employment or in connection with any employment that requires inpatient hospitalization for other than medical observation or diagnostic testing, or in which an employee suffers an amputation, the loss of an eye, or any serious degree of permanent disfigurement, but does not include any injury or illness or death caused by an accident on a public street or highway, unless the accident occurred in a construction zone.

Threat of violence - Any verbal or written statement, including, but not limited to, texts, electronic messages, social media messages, or other online posts, or any behavioral or physical conduct, that conveys an intent, or that is reasonably perceived to convey an intent, to cause physical harm or to place someone in fear of physical harm, and that serves no legitimate purpose.

Workplace violence - Any act of violence or threat of violence that occurs in a place of employment.

Workplace violence includes, but is not limited to, the following:

- The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury.
- An incident involving a threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee sustains an injury.
- The following four workplace violence types:

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Type 1 violence - Workplace violence committed by a person who has no legitimate business at the worksite, and includes violent acts by anyone who enters the workplace or approaches employees with the intent to commit a crime.

Type 2 violence - Workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.

Type 3 violence - Workplace violence against an employee by a present or former employee, supervisor, or manager.

Type 4 violence - Workplace violence committed in the workplace by a person who does not work there, but has or is known to have had a personal relationship with an employee.

Workplace violence does not include lawful acts of self-defense or defense of others.

Work practice controls - Procedures and rules which are used to effectively reduce workplace violence hazards.

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RESPONSIBILITY

The WVPP Administrator - the SPE Chief Security, Safety, and Sustainability Officer, has the authority and responsibility for implementing the provisions of this plan for Sony Pictures Entertainment, Inc. (SPE). The WVPP Administrator and/or his designee works with representatives from appropriate departments, including without limitation, People & Organization, Investigative Services and Internal Communications to implement the plan. The WVPP Administrator can be contacted at ProtectSPE@spe.sony.com

All managers and supervisors are responsible for implementing and maintaining the WVPP in their work areas and for answering employee questions about the WVPP or referring employees to the appropriate contact.

EMPLOYEE ACTIVE INVOLVEMENT

SPE has implemented the following policies and procedures to obtain the active involvement of employees and authorized employee representatives in developing and implementing the plan:

- Management will work with and allow employees and authorized employee representatives to participate in:
 - Identifying, evaluating, and determining corrective measures to prevent workplace violence. SPE's [Workplace Violence Prevention Plan Resource Hub](#) (the WVPP Hub) on the company's intranet provides employees information on how to report hazards in emergency and non-emergency situations.
 - Designing and implementing training. Training materials are piloted with groups of employees to obtain feedback during the development of the training. In addition, employees are encouraged to provide feedback on training.
 - Reporting and investigating workplace violence incidents. The [WVPP Hub](#) on the company's intranet provides employees information on how to report hazards in emergency and non-emergency situations.
- Management will ensure that all workplace violence policies and procedures within this written plan are clearly communicated and understood by all employees. Managers and supervisors will work with the WVPP Administrator and P & O to enforce the rules fairly and uniformly.
- All employees will follow all workplace violence prevention plan directives, policies, and procedures, and assist in maintaining a safe work environment. Employees who are found to have violated the plan will be subject to disciplinary action up to and including termination.
- The plan shall be in effect at all times and in all work areas and be specific to the hazards and corrective measures for each work area and operation.

EMPLOYEE COMPLIANCE

Our system to ensure that employees comply with the rules and work practices that are designed to make the workplace more secure, and do not engage in threats or physical actions which create a security hazard for others in the workplace, include at a minimum:

- Training employees, supervisors, and managers in the provisions of SPE's Workplace Violence Prevention Plan (WVPP)

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- Effective procedures to ensure that supervisory and nonsupervisory employees comply with the WVPP.
- Provide retraining to employees whose safety performance is deficient with the WVPP.
- Recognizing employees who demonstrate safe work practices that promote the WVPP in the workplace through SPE's employee recognition program(s).
- Discipline employees for failure to comply with the WVPP. Employees who are found to have violated the WVPP will be subject to disciplinary action up to and including termination.

COMMUNICATION WITH EMPLOYEES

We recognize that open, two-way communication between our management team, staff, and other employees, about workplace violence issues is essential to a safe and productive workplace. The following communication system is designed to facilitate a continuous flow of workplace violence prevention information between management and staff in a form that is readily understandable by all employees, and consists of one or more of the following:

- New employee onboarding includes information about SPE's workplace violence prevention policies and procedures.
- Workplace violence prevention training programs.
- Meetings, scheduled as needed, that address security issues and potential workplace violence hazards.
- Posted or distributed workplace violence prevention information, including on the [WVPP Hub](#)
- Employees are informed on how to report a violent incident, threat, or other workplace violence concern to employer or law enforcement without fear of reprisal or adverse action.
 - Emergency Situations:
 - Employees located on the Culver City lot: Call the Studio Emergency Line (310) 244-4444, which is a 24-hour emergency line.
 - Employees not located on the lot in Culver City: Call 911 or the appropriate local emergency number, and then when safe to do so, notify the Studio Emergency Line (310) 244-4444.
 - Additional notification procedures for specific locations available on the [WVPP Hub](#) on mySPE.
 - Non-Emergency Situations – Please note the following options:
 - The employee's manager or supervisor
 - The employee's Business Partner. If unknown, please contact PO_employeeedirect@spe.sony.com
 - P&O Employee Relations – EmployeeRelations@spe.sony.com
 - GSOC – Global Security Operations Center – gsoc@spe.sony.com or Non-Emergency Number (310) 244-5505
 - Sony Safety Hotline – Confidential (888) 883-7233 or (310) 244-7266
 - Sony Ethics & Compliance Hotline – Can be Anonymous – (855) 315-0767
 - Please see the [Workplace Violence Prevention Plan Hub](#) for additional ways to report specific to location.
- Employees will not be prevented from accessing their mobile or other communication devices to seek emergency assistance, assess the safety of a situation, or communicate with a person to verify their safety.

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COORDINATION WITH OTHER EMPLOYERS

SPE will implement the following effective procedures to coordinate implementation of its plan with other employers to ensure that those employers and employees understand their respective roles, as provided in the plan.

- SPE expects employers with employees at SPE facilities to train their employees will be trained on workplace violence prevention in accordance with applicable law.
- Workplace violence incidents involving any employee are reported, investigated, and recorded.

At multiemployer worksites including the Sony Pictures Studios lot, SPE will ensure that if its employees experience workplace violence incident that SPE will record the information in a violent incident log. SPE shall also provide to and/or receive from other employers' information regarding workplace violence incidents as may be appropriate and in accordance with applicable law.

WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE

SPE will implement the following effective reporting procedures:

- In Emergency Situations individual who believe they have experienced or witnessed violence on the job must contact the following:
 - a. Employees located on the Culver City lot: Call the Studio Emergency Line (310) 244-4444, which is a 24-hour emergency line.
 - b. Employees not located on the lot in Culver City: Call 911, or the appropriate local emergency number and then when safe to do so, notify the Studio Emergency Line (310) 244-4444.
 - c. Additional notification procedures for specific locations may be available on the [WVPP Hub](#).
- In Non-Emergency Situations, individuals who believe they have experienced violence on the job must, as soon as possible, provide a written or verbal complaint to their own or any other supervisor, to a People & Organization representative or to any other reporting option provided on the [WVPP Hub](#).
 - a. The complaint should include details of the incident(s), names of the individuals involved, and the names of any witnesses.
 - b. Supervisors and managers must immediately refer all such complaints to the People & Organization Department or to any other reporting option provided on the [WVPP Hub](#).
- Investigation:
 - a. All incidents will be investigated.
 - b. Mitigating measures will be taken as may be appropriate based on the findings.
 - c. SPE prohibits retaliation against individuals making a good faith complaint. Employees who violate the anti-retaliation policy are subject to discipline up to and including termination.

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EMERGENCY RESPONSE PROCEDURES

SPE has in place the following specific measures to handle actual or potential workplace violence emergencies:

- Effective means to alert employees of the presence, location, and nature of workplace violence emergencies. SPE maintains the AlertSPE emergency notification system which contacts employees by text, phone call and/or email. Each building also has audible alarms which can be triggered in the event of an emergency, and which will signal necessity to evacuate.
- SPE regularly practices building evacuations in case of emergency situations in all of its properties, and these are regularly monitored by SPE Emergency Preparedness, Security, Fire and Medical.
- Employees may secure help from staff, security personnel, or law enforcement using the notification process described above.

In the event of an emergency on the lot or in Culver City, CA, including a Workplace Violence Emergency, contact the following:

Responsible Persons	Job Title/Position	WVPP Responsibility	Phone #
Studio Emergency Line	24/7 Global Operations Center	Responsible for emergency response, incident triage, escalation as appropriate, dispatching emergency personnel	(310) 244 - 4444

In the event of an emergency on other properties, including a Workplace Violence Emergency, persons are directed to call 911 or the appropriate local emergency number, or when safe to do so, notify the Studio Emergency Line at the above number.

WORKPLACE VIOLENCE HAZARD IDENTIFICATION AND EVALUATION

The following policies and procedures are established and required to be conducted by SPE to ensure that workplace violence hazards are identified and evaluated:

- Inspections shall be conducted when the plan is first established, after each workplace violence incident, and whenever the employer is made aware of a new or previously unrecognized hazard.
- All incidents will be reviewed, escalated and mitigated, as appropriate, in a timely fashion.
- Response logs will be monitored monthly to ensure this is being accomplished.

Periodic Inspections

Periodic inspections of workplace violence hazards will identify unsafe conditions and work practices. This may require assessment for more than one type of workplace violence. Periodic Inspections shall be conducted:

- On the Sony Pictures Studios lot daily inspections occur as part our 24/7 security force patrol. These are reported up through the chain of command and hazards are escalated or mitigated depending on severity.

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- At other locations, periodic inspections to identify and evaluate workplace violence hazards will be performed by designated members of the S3 or security personnel in the workplace.

WORKPLACE VIOLENCE HAZARD CORRECTION

Workplace violence hazards will be evaluated and corrected in a timely manner. SPE will implement the following effective procedures to correct workplace violence hazards that are identified:

- If an imminent workplace violence hazard exists that cannot be immediately abated without endangering employee(s), all exposed employee(s) will be removed from the situation except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition will be provided with the necessary protection.
- All corrective actions taken will be documented and dated on the appropriate forms including for example on the investigation and/or security task logs.
- Corrective measures for workplace violence hazards will be specific to a given work area and any specific reported incident.

PROCEDURES FOR POST INCIDENT RESPONSE AND INVESTIGATION

After a workplace incident, the WVPP administrator or their designee will implement the following post-incident procedures:

- Visit the scene of an incident as soon as safe and practicable.
- Interview involved parties, such as employees, witnesses, law enforcement, and/or security personnel.
- Review security footage of existing security cameras if applicable.
- Examine the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
- Determine the cause of the incident.
- Take corrective action to prevent similar incidents from occurring.
- Record the findings and ensuring corrective actions are taken.
- Obtain any reports completed by law enforcement.
- The violent incident log will be used for every workplace violence incident and will include information, such as: See Violent Incident Log template.
 - The date, time, and location of the incident.
 - The workplace violence type or types involved in the incident.
 - A detailed description of the incident.
 - A classification of who committed the violence, including whether the perpetrator was a client or customer, family or friend of a client or customer, stranger with criminal intent, coworker, supervisor or

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manager, partner or spouse, parent or relative, or other perpetrator.

- A classification of circumstances at the time of the incident, including, but not limited to, whether the employee was completing usual job duties, working in poorly lit areas, rushed, working during a low staffing level, isolated or alone, unable to get help or assistance, working in a community setting, or working in an unfamiliar or new location.
- A classification of where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area.
- The type of incident, including, but not limited to, whether it involved any of the following:
 - Physical attack without a weapon, including, but not limited to, biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting.
 - Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object.
 - Threat of physical force or threat of the use of a weapon or other object.
 - Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact.
 - Animal attack.
 - Other.
- Consequences of the incident, including, but not limited to:
 - Whether security or law enforcement was contacted and their response.
 - Actions taken to protect employees from a continuing threat or from any other hazards identified as a result of the incident.
 - Information about the person completing the log, including their name, job title, and the date completed.
- Reviewing all previous incidents.
- When appropriate, WVPP Administrator or designee will work with P & O to consider offering support and resources to affected employees (These resources could include referrals to counseling services, information about employee assistance programs, and time off work if necessary).

SPE will ensure that no personal identifying information is recorded or documented in the violent incident log. This includes information which would reveal identification of any person involved in a violent incident, such as the person's name, address, electronic mail address, telephone number, social security number, or other information that, alone or in combination with other publicly available information, reveals the person's identity.

TRAINING AND INSTRUCTION

All employees, including managers and supervisors, will have training and instruction on general and job-specific workplace violence practices. These sessions could involve presentations, discussions, and practical exercises. Training and instruction will be provided as follows:

- When the WVPP is first established.

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- Annually to ensure all employees understand and comply with the plan.
- Whenever a new or previously unrecognized workplace violence hazard has been identified and when changes are made to the plan. The additional training may be limited to addressing the new workplace violence hazard or changes to the plan.

SPE will provide its employees with training and instruction on the definitions found on page 1 of this plan and the requirements listed below:

- The employer's WVPP, how to obtain a copy of the employer's plan at no cost, and how to participate in development and implementation of the employer's plan.
- How to report workplace violence incidents or concerns to the employer or law enforcement without fear of reprisal.
- Workplace violence hazards specific to the employees' jobs, the corrective measures SPE has implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm.
- The violent incident log and how to obtain copies of records pertaining to hazard identification, evaluation and correction, training records, and violent incident logs.
- SPE encourages interactive questions and answers with a person knowledgeable about the SPE WVPP through email to protectspe@spe.sony.com.

EMPLOYEE ACCESS TO THE WRITTEN WVPP

SPE ensures that the WVPP plan shall be in writing and shall be available and easily accessible to employees, authorized employee representatives, and representatives of Cal/OSHA at all times. This will be accomplished by posting the WVPP on the [WVPP Hub](#) on MySPE available and accessible 24/7 or by providing written copies upon request to P&O.

RECORDKEEPING

SPE will:

- Create and maintain records of workplace violence hazard identification, evaluation, and correction, for a minimum of five (5) years.
- Create and maintain training records for a minimum of one (1) year and include the following:
 - Training dates.
 - Contents or a summary of the training sessions.
 - Names and qualifications of persons conducting the training.
 - Names and job titles of all persons attending the training sessions.
- Maintain violent incident logs for minimum of five (5) years.
- Maintain records of workplace violence incident investigations for a minimum of five (5) years.
 - The records shall not contain medical information per subdivision (j) of section 56.05 of the Civil Code.
- All records of workplace violence hazard identification, evaluation, and correction; training, incident logs and workplace violence incident investigations required by [LC section 6401.9\(f\)](#), shall be made available

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to Cal/OSHA upon request for examination and copying.

EMPLOYEE ACCESS TO RECORDS

The following records shall be made available to employees and their representatives, upon request and without cost, for examination and copying within **15 calendar days of a request**:

- Records of workplace violence hazard identification, evaluation, and correction.
- Training records.
- Violent incident logs.

Requests for examination or copying of logs may be emailed to ProtectSPE@spe.sony.com.

REVIEW AND REVISION OF THE WVPP

The SPE WVPP will be reviewed for effectiveness:

- At least annually.
- When a deficiency is observed or becomes apparent.
- After a workplace violence incident.
- As needed.

Review and revision of the WVPP will include the procedures listed in the EMPLOYEE ACTIVE INVOLVEMENT section of this WVPP, as well as the following procedures to obtain the active involvement of employees and authorized employee representatives in reviewing the plan's effectiveness:

- Review of SPE's WVPP should include, but is not limited to:
 - Review of incident investigations and the violent incident log.
 - Assessment of the effectiveness of security systems, including alarms, emergency response, and security personnel availability (if applicable).
- Review that violence risks are being properly identified, evaluated, and corrected. Any necessary revisions are made promptly and communicated to all employees. [These revisions could involve changes to procedures, updates to contact information, and additions to training materials.]

EMPLOYER REPORTING RESPONSIBILITIES

As required by [California Code of Regulations \(CCR\), Title 8, Section 342\(a\). Reporting Work-Connected Fatalities and Serious Injuries](#), SPE will immediately report to Cal/OSHA any serious injury or illness (as defined by [CCR, Title 8, Section 330\(h\)](#)), or death (including any due to Workplace Violence) of an employee occurring in a place of employment or in connection with any employment.

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REVISION HISTORY

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SPE-3-002-A4	7/15/2024	Alex Epstein	Typo corrected
SPE-3-007-A4.1	7/22/2024	Alex Epstein	New Document Control Number Issued by ISO Team

[Date of completion]