

Warner Bros. Studios Facilities, Inc.
Injury and Illness Prevention Program

POLICY

Warner Bros. Studios Facilities, Inc. believes that everyone benefits from a safe and healthful work environment. We are committed to maintaining an injury-free and illness-free workplace, and to complying with applicable laws and regulations governing workplace safety.

To achieve this goal the Company has adopted an Injury and Illness Prevention Program (IIPP). This program is everyone's responsibility as we work together to identify and eliminate conditions and practices that reduce the benefits of a safe and healthful work environment.

RESPONSIBILITY

All employees are expected to work conscientiously to implement and maintain the IIPP program. Lowell Moore, VP Safety and Environmental Affairs, is the program administrator, and has the authority and responsibility for implementing the provisions of this program. Any questions regarding the program should be directed to the program administrator.

Senior Management

Senior management must set policy and provide leadership by participation, example, and a demonstrated interest in the program.

Responsibilities include:

- Developing policy
- Allocating adequate resources
- Ensuring responsibility
- Reviewing and evaluating results.

IIPP Program Administrator

The program administrator is responsible for ensuring that all provisions of the IIPP are implemented.

Responsibilities include:

- Advising senior management on safety and health policy issues
- Maintaining current information on local, state and federal safety and health regulations
- Acting as liaison with government agencies
- Planning, organizing and coordinating safety training

- Preparing and distributing company policies and procedures on workplace safety and health issues
- Developing Codes of Safe Practices and inspection guidelines
- Arranging safety and health inspections and follow-up to ensure that necessary corrective action is completed
- Making sure that an adequate supply of personal protective equipment is available
- Establishing accident report and investigation procedures, and maintaining injury and illness records (OSHA log 300)
- Reviewing injury and illness trends
- Establishing a system for maintaining records of inspection, hazard abatement, and training.

Supervisors

Supervisors are responsible for ensuring that employees know and abide by the Company policy and procedures regarding safety. They are expected to do everything within their control to assure a safe workplace in their area.

Responsibilities include:

- Keeping abreast of safety and health regulations affecting operations they supervise
- Ensuring that each subordinate is able to and understands how to complete each assigned task safely
- Conducting on-the-job safety training of those they supervise
- Advising the program administrator of training needs of subordinates
- Making sure equipment and machines are in safe operating condition
- Ascertaining that subordinates follow safe work practices and health regulations
- Ensuring that employees under their direction wear required protective equipment
- Correcting unsafe and unhealthful conditions within their power
- Notifying the Safety Department if they are unable to correct the condition.
- Investigating accidents to discover cause(s) and identifying corrective action to prevent future occurrences as directed by the Safety Dept.
- Conducting periodic inspections of their work areas according to the appropriate inspection checklist(s).

COMPLIANCE

Management is responsible for ensuring that Company safety and health policies and procedures are clearly communicated and understood by all employees. Managers and supervisors are expected to enforce the rules fairly and uniformly.

All employees are responsible for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe work environment.

As part of an employee's regular performance review, the employee will be evaluated on his/her compliance with safe work practices.

Employees who make a significant contribution to the maintenance of a safe workplace, as determined by the program administrator, will receive management acknowledgment.

Employees who are unaware of correct safety and health procedures will be trained or retrained.

Employees who deliberately fail to follow safe work practices and/or procedures, or who violate the Company's safety rules or directives, will be subject to disciplinary action, up to and including termination.

Communication

The Company recognizes that open, two-way communication between management and staff on health and safety issues is essential to an injury-free, productive workplace. The following system of communication is designed to facilitate a continuous flow of safety and health information between management and staff in a form that is readily understandable.

1. The new-employee orientation will include a written review of the Company's IIPP and a discussion of policy and procedures that the employee is expected to follow.
2. The Company will schedule a time at general employee meetings when safety is freely and openly discussed by all present. Such meetings will be regularly scheduled and announced to all employees, so that maximum participation can occur.
3. From time to time, the Company will post and/or distribute written safety notifications. Employees should check Company bulletin boards regularly for such posting(s); the WB Safety website www.wbsafety.com, or new department signage.

Safety-related memos and documents are to be read promptly. Questions about the meaning or implementation of this information should be directed to the supervisor.

4. Other methods of communicating pertinent health and safety information include electronic mail, verbally, postings, and area or equipment specific signage.
5. All employees are encouraged to inform their supervisor, the program administrator or designee of any matter which they perceive to be a workplace hazard and/or a potential workplace hazard. Employees are also encouraged to make safety suggestions and safety training suggestions.

6. If an employee so wishes, he/she may make such notification anonymously by calling the Anonymous Safety Hotline (818) 954-2800 sending either US Mail or interoffice delivery to the program administrator's mailbox. An *Employee Report of Safety Hazard* form may be used by the employee.
7. *No employee shall be retaliated against for reporting hazards or potential hazards, or for making suggestions related to safety.*
8. All suggestions will be reviewed by the program administrator or designee, who will initiate an investigation of each report of a hazard, potential hazard or safety suggestion in accordance with Company procedures for hazard control.
9. Any directives issued as a result of the investigation shall be distributed to all employees affected by the hazard, or shall be posted on appropriate bulletin boards.

WORKPLACE HAZARD EVALUATION AND ABATEMENT

Hazard control is the heart of an effective IIPP program. The company's hazard control procedure is: identify hazards that exist or develop in the workplace, describe how to correct those hazards, and initiate steps to prevent their recurrence.

Assessment of Hazards

Inspection of the workplace is our primary tool used to identify unsafe conditions and practices. While we encourage all employees to continuously identify and correct hazards and poor safety practices, certain situations require formal evaluation and documentation.

Along with each inspection/investigation, the program administrator or designee shall evaluate the severity of the hazard identified, and if it can not be abated immediately, suggest priority for corrective action. The *Hazard Assessment and Correction Record* or *General Checklist for Facility Departments and Buildings* is to be used to document inspections/investigations.

The program administrator or designee will conduct an inspection or investigation whenever any of the following occur:

1. Routinely in each work area, the time and frequency of inspection will be set by the program administrator or designee according to the type of work being performed in each worksite.

Prior to the periodic inspection, the inspector should review workplace injury reports and inspection reports which have been filed since the last investigation or inspection.

The *Hazard Assessment and Correction Record* for the appropriate work area is to be used by the inspector(s).

2. The introduction of new substances, processes, procedures or equipment presents a new safety/health hazard.

Each supervisor is responsible for promptly reporting to the program administrator or designee whenever a new substance (such as a chemical or solvent), new work procedure or technique, and/or new equipment are introduced which may pose a safety risk. A *Notice to WB Safety of Potential New Hazards* form shall be used by the supervisor.

Each supervisor's report should include an evaluation of the potential hazard(s), training and/or other steps to be taken to provide abatement solutions for any potential hazard(s).

Based upon the information, the program administrator or designee will conduct an inspection and issue any directive that may be necessary.

3. The program administrator becomes aware of a new or previously unrecognized hazard, either independently or by receipt of information from an employee, including receipt of a *Notice to WB Safety of Potential New Hazards* form or *Hazard Assessment and Correction Record*.
4. An occupational injury, occupational illness, or near-miss accident occurs.
5. From time to time, the program administrator or designee may conduct unannounced inspections.

All investigations and findings shall be fully documented on the *Hazard Assessment and Correction Record* and filed as directed in *Recordkeeping*.

Abatement of Hazards

It is the Company's intention to eliminate all hazards and unsafe work practices immediately. Some corrective actions require more time. Priority will be given to severe and imminent hazards.

The *General Checklist for Facility Departments and Buildings / Hazard Assessment and Correction Record* forms completed during the inspection/investigation will be used by the program administrator or designee to describe measures taken to abate the hazard or correct the unsafe work practice. Actions to be taken may include, but are not limited to:

- Fixing or replacing defective equipment
- Implementing safer procedures
- Installing guards, modifying equipment

- Employee training
- Posting warning notices.

All such actions taken and the dates they are completed shall be documented on the appropriate forms.

When corrective action involves multiple steps or cannot be completed promptly, an action plan needs to be developed. The *Hazard Assessment and Correction Record* is to be used for this purpose and filed as directed in *Recordkeeping*.

While corrective action is in progress, necessary precautions are to be taken to protect or remove employees from exposure to the hazard,

Employees shall not enter an imminent hazard area without prior specific approval of the program administrator or designee. Employees expected to correct the imminent hazard shall be properly trained and provided with necessary safeguards.

ACCIDENT INVESTIGATION

The purpose of an accident investigation is to find the cause of an accident and prevent further occurrences – not to assign blame.

A thorough and properly completed accident investigation is necessary to obtain facts. The investigation should focus on causes and hazards. Analysis of what happened and why it happened is aimed at determining how it can be prevented in the future.

Injury and Illness

The occurrence of an occupational injury and/or illness precipitates a document called *Employer's Report of Injury (CA 5020)*. This report is completed by the injured employee's supervisor, and a copy of the report is to be sent to the program administrator ASAP or designee and no later than 24 hours from the time of occurrence. Upon receipt, the program administrator:

1. Reports fatalities and serious injuries or illness *immediately* by phone or FAX to the nearest office of the Division of Occupational Safety and Health (CCR Title 8, Section 342).
2. Investigates the incident by visiting the site and interviewing the victim and witnesses.

TRAINING

Training is essential to maximizing the skills and knowledge of employees. It is the key to productivity.

The Company has a duty to include safety as an integral part of employee training. Employees need to work safely as well as productively and efficiently. The supervisor is the essential link in ensuring the proper outcome.

Supervisors must know how to perform a designated job, and be aware of safety and health hazards facing employees under their immediate supervision. Supervisors are responsible for ensuring that they themselves and those under their direction receive training on general workplace safety, as well as on safety and health issues specific to each job.

With this in mind, training will be conducted with the following considerations:

Supervisors

The program administrator or designee will consult with department administrators or supervisors to determine training topics and needs of supervisors – these include human relations, trainer skills, production/process skills, and familiarization with hazards and risks faced by employees.

Supervisors who recognize their own need for training are encouraged to submit a direct request for training in any area in which they feel deficient.

Employees

Supervisors are expected to assess training needs of all employees under their direction. They are to train those they supervise in general workplace safety and give them specific instructions regarding hazards unique to any job assignment, to the extent that such information was not already covered in other trainings.

The Company recognizes that continuing safety and health training is needed for:

1. Employees given a job assignment for which they have not previously received training. If the position is supervisory, such training shall include familiarization with hazards and risks faced by the employees under the supervisor's direction.
2. Whenever new substances, processes, procedures or equipment pose a new hazard.
3. Whenever the supervisor, program administrator or designee becomes aware of a previously unrecognized hazard.
4. All employees in periodic refresher safety training involving general workplace safety, job-specific hazards, and/or hazardous materials, as applicable.

All training shall be documented on one of the training record forms and filed as directed in *Recordkeeping*.

RECORDKEEPING

No operation can be successful without recordkeeping that enables the company to learn from past experience and make corrections for future operations. In addition, the IIPP regulation requires records to be kept of the steps taken to establish and maintain the Company's Injury and Illness Prevention Program.

Injury and Illness Prevention Program Records

Each supervisor will maintain an updated copy of the Company's IIPP. The program administrator will retain the following records on file for at least three (3) years:

- Master copy of IIPP, changes/updates
- Documents verifying that the Company has maintained ongoing two-way communications with employees, such as:
 - Memos, letters to employees on safety and health issues
 - New employee safety orientation session acknowledgment form
 - Employee suggestions or Anonymous Calls and Company response
- All records of inspections/investigations – including date, name of person who performed the inspection/investigation, unsafe conditions and work practices identified, corrective action taken and date of correction – forms covered in this category include:
 - *Employee Report of Safety Hazard*
 - *General Checklist for Facility Departments and Buildings Hazard Assessment and Correction Record*
 - *Accident/ Incident Investigation Report*
- Records of safety and health training received by employees – containing the employee's name, training date, type of training and identification of trainer – example are:
 - *Tool Box Talk or Safety Meeting Attendance Form*
 - *Notice to WB Safety of Potential New Hazards or New Employee*
 - *Employee Acknowledgment for Receipt of General Safety Guidelines*