



Injury & Illness Prevention Program

Safety Policy Statement

It is the policy of All3Media America that injury and illness prevention shall be considered of the utmost importance in all phases of production and administration. It is the intention of management to provide safe and healthy working conditions and to establish and insist upon safe practices at all times by all employees. The prevention of injury and illness is an objective affecting all levels of our company, its productions and administrative operations. As such, it is a basic requirement that each supervisor make the safety of employees an integral part of his or her regular management function. It is equally the duty of each employee to accept and follow established safety regulations and procedures, and every effort will be made to provide adequate training to employees.

We expect everyone's cooperation in detecting hazards, reporting dangerous conditions and controlling workplace hazards as a condition of employment. Everyone is responsible for the housekeeping duties that pertain to their specific job, and unsafe conditions must be reported immediately.

Any injury that occurs on the job, even a slight cut or strain, must be reported as soon as possible. Under no circumstances, except an emergency situation (such as trips to hospital), should an employee leave a shift without reporting an injury that occurred. Everyone has a duty to inform his or her supervisor immediately of any situation that is beyond his or her ability or authority to correct. Employees will not be disciplined or suffer any retaliation for reporting a safety violation in good faith.

Assignment of Responsibility

It is the objective of All3Media America ("ALL3A") to provide a safety and health program that will reduce the number of injuries and illnesses to an absolute minimum, and we hold ourselves to the highest standards in ensuring safety of our employees.

ALL3A accepts the responsibility for leadership of the safety and health program, for its effectiveness and improvement and for providing the safeguards required to ensure safe conditions. Amy Hussey, Chief Operating Officer, represents top management who support and regulate this program. The administration and oversight of the safety program is assigned to the following Safety Administrators:

Non-Production: Collette Sobray - Vice President, Human Resources

Production: Dana Boratenski - Director, Production

Responsibilities include, but are not limited to:

- Developing and implementing programs and rules of safe practices for non-production and production staff, both in the office and on-location
- Regularly train non-production and production managers on the program
- Conducting regular health & safety training meetings with all employees

- Ensuring Production Managers follow health and safety procedures in connection with daily on location production meetings
- Providing necessary personal protective equipment, and instructions for use and care
- Providing CPR training to employees, specifically production employees
- Developing and implementing a system to encourage employees to report unsafe conditions immediately
- Conducting thorough investigations of each accident, whether or not it results in an injury, to determine the cause of the accident and to prevent recurrence
- Conducting safety and health inspections to find, eliminate or control safety and health hazards as well as unsafe working conditions
- Correcting unsafe and unhealthy work practices in a timely manner and document corrections
- Maintaining records of all employee training, corrections of unsafe conditions, dates and results of workplace inspections
- Regularly reviewing safety policy and procedures

Top Management and Safety Administrators meet on a quarterly basis to ensure that this program is properly implemented and adhered to. ALL3A reserves the right to modify this policy in part or in full at any time, as it deems necessary in the course and scope of business. In the event this program is modified for any reason, a new version will be distributed to all employees as appropriate.

Code of Safe Practices

ALL3A does everything within its power to protect employees from accidents, injuries and/or occupational disease while on the job. Safety is a cooperative undertaking requiring an ever-present safety consciousness on the part of every employee. Every employee is responsible for total and genuine cooperation of all aspects of the safety and health program including compliance with all rules and regulations and for continuously practicing safety while performing their duties.

If an employee is injured, positive action must be taken promptly to see that the employee receives adequate treatment. No one likes to see a fellow employee injured by an accident. Therefore, all operations must be planned accordingly to prevent accidents.

To carry out this policy, the Company has compiled a code of safe rules which apply to every employee. This list is neither inclusive nor exhaustive of all safe practices. Please refer to the “Code of Safe Practices” document attached as Appendix A.

As it is ALL3A's policy to provide a safe and clean workplace and to maintain sound operating practices, concentrated efforts shall produce safe working conditions and result in efficient, productive operations. Safeguarding the health and welfare of our employees cannot be stressed enough. Accident prevention is the responsibility of all of us. Department heads and supervisors at all levels shall be responsible for continuous efforts directed toward the prevention of accidents. Equally, employees are responsible for performing their jobs in a safe manner. The observance of safe and clean work practices, coupled with ongoing compliance of all established safety standards and codes, will reduce accidents and make ALL3A a safe place to work.

Communication & Safety Meetings

Communication

ALL3A recognizes that open two-way communication between management and staff on health and safety issues is essential to an injury-free productive workplace. Everyone's thoughts regarding safety are considered important, and we encourage everyone's active participation in the company safety program. Employees should feel free to express any of safety concerns or suggestions.

ALL3A communicates with its employees in the form of directions and statements from management, written, in the form of directives and this manual, verbally, and by example. Please refer to the "Emergency Communication Procedures" document attached as Appendix B as an example of ALL3A's communication.

Periodic Office Safety Meetings

At least twice per year, ALL3A will conduct safety meetings for the purpose of conveying safety information and answering employee questions. The format of most meetings will be to review the content of the injury prevention program, special work site hazards, emergency evacuation plans, serious concealed dangers or any other safety related information.

ALL3A holds impromptu safety meeting when appropriate to address or reaffirm its commitment to the health and safety of all employees.

Production Safety Meetings

While on location, production managers hold safety meetings either at the beginning of the production, or at the beginning of each day, depending on the circumstances (length of production and location).

These meetings are designed to cover all safety issues or concerns for that specific production and/or location. Please refer to the "Sample - Safety Meeting Bullet Points" document attached as Appendix C.

Emergency Response Team (Office Facility)

ALL3A has established an Emergency Response Team who provides on-site emergency assistance in an emergency situation in our leased facility office space. There is one Emergency Response Team for each floor in our facility. The Emergency Response Team assumes command and control of the assigned floor until professional help arrives.

All Emergency Response Team Members have been assigned an orange safety vest, employee list, walkie-talkie (floor wardens & searchers), flashlight, whistle, post-it notes and glow sticks that should be available at all times. Please refer to the “Emergency Response Roles” document attached as Appendix D.

Scheduled Inspections & Evaluations

ALL3A is committed to conducting monthly inspections of their facilities for hazards which could contribute to injuries and/or illnesses. The Safety Administrators have the responsibility to exercise common sense and appropriate knowledge to make the assessment and selection.

Workplace Assessment

When conducting assessments, ALL3A uses the following guidelines for potential hazards:

- **Physical** - physical surroundings (buildings, grounds, equipment, etc.), noise, temperatures, radiation, lighting, vibration, fire, slip/falls, working from heights, working alone, travelling for work
- **Ergonomic** - interaction between people and equipment, as well as environmental conditions relative to human performance and comfort such as lighting, seating, body position, repetitive motion
- **Biological** - bacteria, viruses, mold, insects, plants, birds, animals, and humans, etc.
- **Chemical** - airborne gases, vapors, mists, dust and fumes as well as solids and liquids. Routes of exposure include absorption (skin and eyes), ingestion and inhalation
- **Psychosocial** - stress, violence, sleep deprivation, fatigue, etc.

Scheduled Safety Inspections

Upon initial implementation of this Program, inspections of all work areas will be conducted. All inspections will be documented accordingly with appropriate abatement of any hazards detected.

Going forward, these inspections will be conducted on a monthly basis via walk-through survey of the facilities with consideration given as indicated above.

Unscheduled Safety Inspections

Additional safety inspections will be conducted as follows:

- When new substances, processes, procedures or equipment that present potential new hazards are introduced into our workplace
- When new, previously unidentified hazards are recognized
- When occupational injuries and/or illnesses occur
- When we hire and/or reassign permanent or intermittent employees to processes, operations, or tasks for which a hazard evaluation has not been previously conducted
- Whenever workplace conditions warrant an inspection

On Location Production Safety Inspections

In addition, ALL3A is committed to conducting daily inspections of their on location productions. The production manager has the responsibility to exercise common sense and appropriate knowledge to make the assessment and selection. When conducting assessments, at a minimum, ALL3A uses the following guidelines for potential hazards:

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| ➤ Access and Exits | ➤ Heavy Lifting |
| ➤ Aircraft | ➤ Heights |
| ➤ Alcohol | ➤ High Traffic Areas |
| ➤ Allergies | ➤ Hostile Environments |
| ➤ Animals (Pets / Wild) | ➤ Infectious Disease |
| ➤ Art Removal | ➤ Insects and Animals |
| ➤ Bathrooms | ➤ Manual Handling and Heavy Lifting |
| ➤ Cable Runs | ➤ Night Filming |
| ➤ Chemicals | ➤ Poison |
| ➤ Children | ➤ Power and Electricity |
| ➤ Compressed Gas | ➤ Radiation |
| ➤ Confined Spaces | ➤ Sanitation |
| ➤ Crowds and Public | ➤ Security |
| ➤ Dangerous Structures | ➤ Special Needs / Handicap |
| ➤ Electrical Issues | ➤ Steam / Smoke |
| ➤ Environment | ➤ Stunts |
| ➤ Explosives / Pyro / Fire | ➤ Theft and Storage |
| ➤ Evacuation Procedures | ➤ UV Exposure |
| ➤ Fatigue and Stress | ➤ Vehicles and Driving |
| ➤ Firearms | ➤ Waste |
| ➤ First Aid and Medication | ➤ Water |
| ➤ Flammable Materials | ➤ Weapons |
| ➤ Freelance Crews | ➤ Weather |
| ➤ Glass Breakage | ➤ Welding |

Please contact Production Management for the Risk Assessment Template used to inspect hazards on each production.

Accident/Exposure Investigation

Accidents occurring during the course and scope of work, regardless of the time and location of the occurrence, must be reported the Safety Administrators no later than 8 hours following the incident. Additionally, the accident must be initially investigated, by the employee's supervisor, the Accident Investigation Report forwarded to the Safety Coordinators no later than 24 hours following the incident. Please refer to the "Accident Investigation Report" document attached as Appendix E.

ALL3A considers "supervisor" to be a person assumed to be in authority witnessing or responding in some manner to the incident. For our purposes, these persons are defined as a department heads, production managers, producers, line producers, managers, supervisors or other designees having ultimate responsibility for the Company facilities or an on-location production. The Accident Investigation Report for any incident must be forwarded to the Safety Administrators no later than 24 hours following the incident or the next business day following the incident, whichever is shorter.

Employee accidents involving a serious injury or illness are those incidents where the employee requires in-patient hospitalization in excess of 24 hours, for other than medical observation, or in which the employee suffers a loss of any member of the body or suffers any permanent disfigurement. Any accident that involves a serious injury/illness, hospitalization (taken by private/state vehicle or ambulance) or death must be immediately reported (verbally) to the Safety Administrators, by the "supervisor," but no longer than 8 hours after the incident.

The "supervisor" shall provide the verbal and written notifications consistent with the above-referenced procedure and whether it is an "on" or "off" hours incident. The Safety Administrators have responsibility to notify Cal-OSHA, by telephone, of any employee accident involving a serious injury or illness or death. Failure of ALL3A to notify Cal-OSHA within the 8 hour time frame may result in a citation and fine.

The preliminary investigation, completed on the Accident Investigation Report, shall include the following information for each employee involved:

What happened?

- Include a complete description of what took place and the nature of the injury/illness to the employee that prompted the report.

Why did the accident happen?

- Obtain and relay all the facts surrounding the accident:
 - What was the sequence of events, both behaviorally by the employee(s) and in the work area, leading up to the accident
 - Were proper operating procedures established for the task involved
 - Were proper work procedures being followed, and if not, why
 - Was the employee trained and qualified to perform the tasks involved
 - What is/are the root cause(s) of the accident

What should be done?

- The investigation must determine the root cause(s) of the accident and the most reasonable corrective action(s). The intent is not to establish blame, but to ensure a like incident does not occur in the future. This shall be accomplished by management effectively communicating the results of the investigation to affected staff and ensuring that the corrective actions are implemented.

What action has been taken?

- Actions already taken to reduce or eliminate the exposures being investigated should be noted, along with those remaining to be addressed. Any interim or temporary precautions should also be noted. Any pending corrective actions and reason for delaying its implementation should be identified.

The Accident Investigation Report shall also include this additional information:

- Time and date of accident
- Employers name, address and telephone number
- Name and job title of person reporting the accident
- Address and location of the site of accident or event
- Name of person to contact at site of accident
- Name and address of the injured employee(s)
- Nature of injury
- Location where injured employee(s) were moved to
- List and identity (name and badge number) of any law enforcement personnel present at the site of the accident
- Description of accident and whether the accident scene or instrumentality was altered

Once the investigation has been conducted, all relevant documentation must be forwarded to the Safety Administrators who will review the reports and associated documentation and ensure that appropriate repairs or procedural changes will be implemented promptly to correct the hazards implicated in these events.

PLEASE NOTE: Additional worker's compensation forms may need to be completed and provided to the injured employee. If you are unsure whether or not to provide these forms, please contact the Safety Administrators for further instructions. Please refer to Appendix F for the requisite forms to provide for production staff and Appendix G for the requisite forms to provide to production staff.

Correction of Unsafe Conditions/Practices

Unsafe or unhealthy work conditions, practices, or procedures shall be corrected in a timely manner based on the severity of the hazards. Hazards shall be corrected according to the following procedures:

- Whenever possible, a hazard shall be corrected immediately upon discovery.
- When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, we will remove all exposed workers from the area except those necessary to correct the existing condition. Workers necessary to correct the hazardous condition shall be provided with the necessary protection.
- All such actions taken and dates they are completed shall be documented appropriately.

Safety & Health Training

Training is one of the most important elements of any injury and illness prevention program. Such training is designed to enable employees to learn their jobs properly, bring new ideas to the workplace, reinforce existing safety policies and put the injury and illness prevention program into action. Training is required for both supervisors and employees.

ALL3A assures training is provided that familiarizes supervisors with the safety and health hazards the employees under their immediate direction and control to which they may be exposed. Supervisors are also responsible for ensuring that those under their direction receive training on general work place safety as well as specific instructions with regard to hazards unique to any job assignment.

All employees shall receive safety training and instruction:

- During orientation for job specific and general safety rules. This shall include but, not be limited to emergency preparedness and evacuation procedures, and hazard communication.
- If an employee is given a new job assignment, safety training for the new assignment will be given at orientation.
- Whenever new substances, processes, procedures or equipment are introduced to the workplace.
- During regularly scheduled safety meetings.
- Refresher safety training will be conducted on a regular basis and retraining shall be available for employees demonstrating a deficit in safety knowledge.
- What to do in case of emergencies occurring in the workplace.

Employee Responsibility

Teaching safety is a two-way street. ALL3A can preach safety, but only employees can practice safety. Safety education requires everyone's participation. When ALL3A schedules safety meetings, it is mandatory that every employee attends. Meetings are conducted to discuss the program and the application of this injury and illness prevention program.

The following are general rules to apply:

- No employee should undertake a job that appears to be unsafe
- No employee is expected to undertake a job until he/she has received adequate safety instructions, and is authorized to perform the task
- No employee should use chemicals without fully understanding their toxic properties and without the knowledge required to work with these chemicals safely
- Mechanical safeguards must be kept in place
- Employees must report any unsafe conditions to the job supervisor and any work-related injury or illness must be reported to the job supervisor
- Personal protective equipment must be used when and where required
- All such equipment must be properly maintained

Accident Prevention

Each employee has a personal responsibility to prevent accidents. Every employee has a responsibility to themselves, their fellow workers and to the Company. Employees will be expected to observe safe practice rules and instructions relating to the efficient handling of their work.

Employee responsibilities include the following:

- Incorporate safety into every job procedure. No job is done efficiently unless it has been done safely
- Know that disciplinary action may result from a violation of the safety rules
- Report all injuries immediately, no matter how slight the injury may be
- Caution fellow workers when they perform unsafe acts
- Don't take chances. Ask questions when there is any doubt concerning safety
- Don't tamper with anything you do not understand
- Report all unsafe conditions or equipment to your supervisor or Safety Coordinator immediately

Recordkeeping

ALL3A has implemented the following recordkeeping procedures to implement and maintain our IIP Program:

- Records of hazard assessment inspections - including the person(s) conducting the inspection, the unsafe conditions and work practices that have been identified, and the action taken to correct the identified unsafe conditions and work practices - are recorded on a hazard assessment and correction form.
- Documentation of safety and health training for each employee - including the employee's name or other identifier, training dates, type(s) of training, and training providers - are recorded on an employee training and instruction form.
- We also include the records relating to employee training provided by a construction industry occupational safety and health training program approved by Cal/OSHA.

All records and training documentation are maintained in accordance with all applicable laws and regulations.