

Hazard Communication Program

PS_PRGM_EXT HAZARDOUS COMMUNICATION v1

Prepared by
The Walt Disney Company – Production Safety

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Hazard Communication Program

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Hazard Communication Program

1.0 Introduction

The Hazard Communication Program is designed to ensure that employees receive adequate information related to hazardous substances used in production operations and processes. This program aligns with the standards for classifying and communicating chemical hazards as outlined in the Globally Harmonized System of Classification and Labeling of Chemicals (GHS).

The Occupational Safety & Health Administration (OSHA) and California Division of Occupational Safety & Health (Cal/OSHA) have developed Hazard Communication Standards to make sure that needed information reaches employers and employees regarding chemical safety. A copy of the appropriate standard can be found on the websites below or obtained from your Studio Production Safety Representative.

California – Title 8 California Code of Regulations, Section 5194

<http://www.dir.ca.gov/title8/5194.html> and [hazard communication guide](#)

Federal (other states) - 29 Code of Federal Regulations, Section 1910.1200

<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.1200>

The Hazard Communication Standard focuses on five main areas:

- Identifying hazardous chemicals and creating chemical inventories
- Product warning labels that meet the GHS requirements
- Safety Data Sheet (SDS) (previously called MSDS)
- The written Hazard Communication Program
- Employee Training

As used in this Program, “hazardous substance” is defined in the Hazard Communication Standard.

Under this program, the suppliers and manufacturers of hazardous substances will be relied upon to supply information regarding the substances; the production will not test or evaluate substances to make hazard determinations.

2.0 Definitions

| Term | Definition |
|---------------------------------|--|
| Hazardous Substance or Chemical | Any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified. |
| Article | An “article” means “a manufactured item other than a fluid or particle: (i) which is formed to a specific shape or design during manufacture (ii) which has end use function (s) dependent in whole or in part upon its shape or design during end use (iii) which under normal conditions of use does not release more than very small quantities, e.g., minute or trace amounts of a hazardous chemical (as determined under paragraph (d) of this section) and does not pose a physical hazard or health risk to employees |

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| Term | Definition |
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| Consumer Products | Consumer products containing hazardous substances that are used in performing one's job. |
| Health Hazard | A chemical that can cause acute or chronic health effects in exposed employees. This includes chemicals which are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents which act on the hematopoietic system, and agents which damage the lungs, skin, eyes, or mucous membranes. |
| Physical Hazard | A chemical that is classified as posing one of the following hazardous effects: explosive, flammable (gases, aerosols, liquids, or solids), oxidizer (liquid, solid, or gas), self-reactive, pyrophoric (liquid or solid), self-heating, organic peroxide, corrosive to metal, gas under pressure, or in contact with water emits flammable gas. |
| Safety Data Sheet (SDS) | A document that provides detailed information about a hazardous chemical, including its properties, health and physical hazards, protective measures, and safety precautions for handling, storing, and transporting the chemical. |
| Label | An appropriate group of written, printed, or graphic information elements concerning a hazardous chemical that is affixed to, printed on, or attached to the immediate container of a hazardous chemical, or to the outside packaging. |
| Exposure | The condition of an employee being subjected to a hazardous chemical in the course of employment through any route of entry (inhalation, ingestion, skin contact or absorption, etc.), and includes potential (e.g., accidental or possible) exposure. |
| Trade Secret | Any confidential formula, pattern, process, device, information, or compilation of information that is used in an employer's business, and that gives the employer an opportunity to obtain an advantage over competitors who do not know or use it. |
| California Proposition 65 | A proposition that mandates businesses to provide clear warnings if their products or activities expose individuals to chemicals that are known to cause cancer, birth defects, or reproductive toxins, unless the exposure level is deemed low enough to pose no significant risk. |

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3.0 Responsibilities

3.1 Production Management (UPM/Department Heads/Foreman)

Production Management holds the primary responsibility for implementing and maintaining the Hazard Communication Program. Its responsibilities include:

- Providing necessary resources to departments to support program requirements.
- Ensuring chemical inventory and SDSs are easily accessible.
- Conducting hazard assessments for hazardous substances to identify and provide appropriate engineering controls and Personal Protective Equipment (PPE) for crew members handling these substances.
- Implementing required engineering controls (e.g., ventilation), PPE, or administrative controls to ensure cast and crew are not overexposed to hazardous substances.

3.2 Department Heads

Each Department Head (DH) is responsible for administering the program in their work area. Responsibilities include:

- Collaborating with production buyers and safety representatives when purchasing new chemicals to ensure hazardous properties are reviewed, as some may require additional regulations.
- Maintaining an updated inventory of hazardous substances in the [chemical management system](#)
- Monitoring the use, handling and management of hazardous substances to meet health and safety standards.
- Providing chemical-specific training to crew handling hazardous substances, ensuring they review applicable SDSs and have proper training before handling.
- Documenting training sessions (e.g., tailgate, toolbox talks).
- Giving crew access to the department's chemical inventory and associated SDSs.
- Ensuring proper engineering controls and PPE use to protect crew from exposure.
- Affixing appropriate GHS labels to all containers, printable from the chemical management system.
- Posting Prop 65 warning signs when necessary.
- Consulting with a Production Safety Representative for assistance with hazardous substance use, labeling, storage, or disposal requirements.

3.3 Crew

Crew members will participate in the program as it applies to their work area and job duties. Crew responsibilities include:

- Reviewing the SDS for any product prior to use.
- Participating in hazard communication and chemical specific training to ensure familiarity with hazardous substances used.
- Ensuring proper use of engineering controls, PPE, and exposure control plans when working with products.

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- Engaging with supervisor or department head with any questions and reporting any concerns regarding the use of hazardous chemicals in the work area. (e.g., spills, leaks, defaced labels, chemical management system, use, storage, etc.).

3.4 Production Safety Representatives

Production Safety Representatives are assigned and available to each production. Production Safety Representative responsibilities include:

- Advising and supporting productions in the implementation of this program.
- Assisting with the proper use of the chemical management system.
- Engaging with team industrial hygienist as needed to ensure compliance with regulatory requirements.
- Providing assistance and advice to productions on regulatory requirements prior to the use of high hazard chemicals (link to high hazard) in the workplace.
- Auditing for compliance with this program.

4.0 Employee Rights

All production employees have the following rights regarding hazardous substances:

- Receive information regarding hazardous substances to which they may be exposed.
- Provision of information to the employee's physician or collective bargaining agent regarding hazardous substances to which the employee may be exposed.

No employee will be discharged or otherwise discriminated against due to the employee's exercise of the employee's rights under the Hazardous Substances Information and Training Act.

5.0 Training

Crew must be given information and training on hazardous substances in their work area at their initial assignment. Information and training must also be provided whenever a new hazard is introduced into their work area. Training shall include:

- A summary of this Hazardous Communication Program and the OSHA Hazard Communication Standard.
- The location of the productions' written Hazard Communication Program, which can be found on the [Disney Production Safety website](#).
- How to read Safety Data Sheets.
- How to interpret information contained on the hazardous substance label.
- Methods for detecting hazardous substances, including a description of hazards' chemical and physical properties.
- The location of the Chemical inventory and SDS sheets as well as the availability of SDS from our SDS chemical management system.

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- How to use the chemical management system and how to access the SDS in your area. Each department shall have information available for crew to access the e-binder and/or hard copy of each SDS.
- Initial response to the spill or release of hazardous materials and the emergency procedures outlined by the Emergency Action Plan.
- Proper work practices for working with hazardous substances.
- Health hazards and signs or symptoms of exposure.
- Review of the hazardous substance hazards, proper handling procedures, exposure controls, and PPE selection requirements.
- Procedures for proper labeling, storage, and disposal of hazardous substance containers.

The Production Office shall verify that all crew members have received appropriate hazardous communication training.

6.0 Hazardous Non-Routine Activities

Production crew may periodically perform non-routine activities (e.g., pyrotechnics, water work, hydraulic-powered gimbals, etc.).

Prior to starting work on hazardous non-routine activities that may include or involve any hazardous substances, the department head must inform their Production Safety Representative and ensure hazardous assessments are completed. In addition, all cast and crew must be informed of the hazards that they may be exposed to when working at or around the hazard. A safety meeting/special training session needs to be held prior to starting work. This meeting/training must include:

- Specific hazards of the non-routine activities
- Measures taken to reduce hazards (e.g., improved ventilation and providing PPE)
- Emergency procedures including your emergency action protocols
- If applicable, establish an exposure control plan

7.0 Recordkeeping

Copies of training sign-in sheets, SDSs, and the assessments on the non-routine tasks must be kept on file in the Production Office / Department Head office(s) and in the Disney chemical management system for each production department.

8.0 List of Hazardous Substances / Chemical Inventory

An initial chemical inventory of all chemicals present at the worksite must be created. Periodic review must also take place to ensure inventory is complete and accurate. This inventory may be a hard copy or maintained electronically. All crew must be made aware of how to access this inventory as well as SDSs. The inventory should include the following information:

- Production / Department Name
- Product Name

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- Identification of manufacturer or supplier
- Location(s) product is used
- Date the SDS was prepared

9.0 California Proposition 65

Proposition 65, the Safe Drinking Water and Toxic Enforcement Act of 1986, requires that production management notify cast/crew before exposing any cast/crew to any hazardous substance as listed on the State of California’s list of Chemicals Known to the State to Cause Cancer or Reproductive Toxicity (22 CCR Section 12000). Notification may include, but is not limited to, signage, training, SDS availability and written notification.

In California, an additional Proposition 65 chemical list must be maintained.

Each department head must be aware of any Proposition 65 listed chemicals being used, provide information to affected department crew members and ensure proper labeling of work areas to alert cast/crew.

10.0 Safety Data Sheets (SDS)

Safety Data Sheets (SDS) are prepared by the manufacturers of hazardous substances. They contain information concerning the hazards posed by a particular product and provide information on its proper handling and use. All departments must maintain and keep SDSs for chemicals used on site.

Each production must inventory every chemical and add them to the chemical management system by department. For each chemical, an associated SDS for the product must be placed in the system e-binder for that department. This information is available and accessible through mobile apps, QR codes, electronic links, hard copy binders, and/or by contacting the department head. Each department shall have information available for crew on how to access the e-binder and/or hard copy of each SDS.

10.1 Products Requiring an SDS

Hazardous substances used in the workplace must have an SDS. Examples of products requiring an SDS include, but are not limited to:

- Paints, coatings, thinners, chemical strippers, inks, solvents
- Cleaning products
- Petroleum-based fluids including diesel, gasoline, engine additives, oils
- Adhesives, mastics
- Horticulture products such as pesticides, fertilizers
- Special effects “fogs”
- Pyrotechnic compounds
- Art materials, photo processing materials
- Foam operations
- Sheet metal, foams, plastic or composite stock that will be cut, welded, machined, sanded or heated
- Batteries containing lead acid or solutions

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- Welding rods
- Compressed gasses
- Products that may contain asbestos such as brake shoes, gaskets and roofing material
- Water treatment chemicals
- Solid products such as diatomaceous earth, silica, cement mixes, carbon black
- Refrigerants
- Laboratory chemicals
- Modifying any Consumer Products or Articles that may introduce hazards. (e.g., burning preformed plastic or Styrofoam which is non-hazardous unless it is burned or wood products).

10.2 Products Not Requiring an SDS

The following are examples of products that do not require an SDS:

- Food, Over the Counter (O-T-C) drugs, cosmetics or alcoholic beverages in a retail establishment that are packaged for sale to consumers or intended for personal consumption by employees while in the workplace.
- Manufactured items that do not release or result in exposure to a hazardous chemical under normal conditions of use (e.g., finished furniture, tires, adhesive tape).

10.3 Reading an SDS

All Safety Data Sheets contain a standard format comprised of 16 specific sections. Identification information on an SDS will match information on the product container label. Information found in the various sections of each SDS include:

| # | Topic | Description |
|---|--|--|
| 1 | Identification | Names the product, who manufactured it, contact information, and instructions for use. |
| 2 | Hazard(s) Identification | Identifies the hazards posed by the chemical, along with information required to be on the chemical's label, including the pictograms, signal word, hazard statements, and precautionary statements. |
| 3 | Composition / Information on Ingredients | Identifies the ingredients contained in the product known to be hazardous. |
| 4 | First Aid Measures | Describes initial care that should be given by untrained responders to an individual who has been exposed to the chemical; including, first-aid instructions by relevant routes of exposure and a description of the most important symptoms or effects. |
| 5 | Fire Fighting Measures | Provides recommendations for fighting a fire caused by the chemical, including suitable extinguishing equipment, provisions for unique circumstances, firefighter protective equipment and other relevant information. |
| 6 | Accidental Release Measures | Provides recommendations on the appropriate response to spills, leaks, or releases, including containment and clean-up practices to prevent or minimize exposure to people, properties, or the environment. |
| 7 | Handling & Storage | Provides guidance on the safe handling practices and conditions for safe storage of chemicals, including precautions for safe handling, minimizing the release of the chemical into the environment, and providing advice on general hygiene practices. |

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| # | Topic | Description |
|----|---|--|
| 8 | Exposure Controls / Personal Protection | Indicates the recognized exposure limits, engineering controls/work practices, and personal protective measures that can be used to minimize worker exposure. |
| 9 | Physical & Chemical Properties | Describes the chemical's characteristics, such as its normal appearance, odor, solubility, boiling, melting and freezing points, just to list a few. |
| 10 | Stability & Reactivity | Describes the reactivity hazards of the chemical and the chemical stability information. It is broken into three parts: reactivity, chemical stability, and others. Reactive chemical information would indicate if the material could vigorously polymerize, decompose, condense, or will become self-reactive under certain conditions; chemical stability information will indicate whether the chemical is stable or unstable, including potentially hazardous conditions; other information would include possible hazardous reactions, conditions to avoid, incompatible materials and any hazardous decomposition products. |
| 11 | Toxicological Information | Identifies toxicological and health effects information or indicates such data is not available; including, potential routes of exposure, known health effects and symptoms, the numerical measures of toxicity, and if the chemical has been identified to have any cancer-causing properties. |
| 12 | Ecological Information | Details the environmental impact of the chemical. |
| 13 | Disposal Considerations | Offers guidance on the proper disposal methods for chemicals. |
| 14 | Transport Information | Provides information on how to transport the chemical safely and legally. |
| 15 | Regulatory Information | Lists regulations specific to the chemical components of the SDS. |
| 16 | Other Information | Includes any other relevant information, such as the date of preparation or revision. |

11.0 Container Labeling

All hazardous substances must be labeled in accordance with the GHS Labeling system. The label must, at a minimum, contain the following information:

- The name of the hazardous substance
- Any specific hazard warning or other hazard information
- Signal word: Danger or Warning
- Pictograms: A visual representation of hazardous products
- Manufacturer information: The manufacturer's name, as well as contact information including an address and phone number.
- Hazard statement: A statement that describes the nature of the hazard(s)
- Precautionary statement: A statement that describes recommended measures to be taken to minimize or prevent adverse effects resulting from exposure to the hazardous product.

All secondary containers must have a label that identifies the substance with the same name that appears on the manufacturer's label and the SDS. This information should be legible. Labels are not to be removed, damaged (illegible) or defaced.

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Department heads and supervisors are responsible for ensuring all incoming materials are properly labeled before being used or stored.

A GHS compliant label may be generated from the chemical management system from each department e-binder system. Contact your Production Safety Representative for assistance.

12.0 Shared Workspaces (Multi-Employer Sites)

Employers sharing the same work area (e.g., contractors, third parties, visitors) must be informed of any hazardous substances to which their employees may be exposed, as well as the appropriate protective measures. This responsibility falls on the Department Head or their designee, who will communicate with the representative responsible for such employees.

The outside employer is required to inform all crew members of any hazardous chemicals, including Proposition 65 chemicals, they might be exposed to during production and the necessary precautions and protective measures to minimize exposure.

All Safety Data Sheet (SDS) information is available in the e-binder for each department. This information can be accessed via mobile apps, QR codes, electronic links, hard copies, or by contacting the Department Head. Each department must ensure that information is accessible for crew members and/or contractors through the e-binder and/or hard copies.

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