The Walt Disney Company

International Labor Standards

Health and Safety

SUPPLEMENTAL GUIDE

Revised April 2025

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For more information on Disney's International Labor Standards (ILS) Program, please review the ILS Program Manual:

INTERNATIONAL LABOR STANDARDS
Program Manual

Introduction

This health and safety Supplemental Guide is intended to increase transparency into the health and safety requirements of Disney's ILS Program. It begins with a Guiding Principle, meant to set the stage for benchmarks, then lists some violation examples and their corresponding ratings.

This Supplemental Guide also highlights:

- **Glossary of key terms and phrases**
- **Benchmark requirements and their associated ratings**
- **Information regarding required documentation, including records and permissions**
- **Recommended safety procedures and equipment**
- **Recommended preventative measures**

Introduction

The Supplemental Guide includes color-coded ratings for each of the benchmarks. The definitions for rating levels are:

Minimum Compliance Standard ("MCS")

is applied to violations which fall below the required level of compliance with Disney's Supply Chain Code of Conduct ("Code").

Serious

is applied to violations that are not MCS violations and may significantly impact worker safety if not addressed promptly.

When three (3) or more Serious violations are identified in a single audit, if any such Serious violation is Systemic then such Serious violation will be rated as an MCS violation.

"Systemic" means any of the following:

A. Three (3) or more Serious violations are from the same category of violations as listed in this chapter, i.e., General Health & Safety, Fire & Emergency Safety, Hazardous Materials, Machine and Electrical Safety, Personal Protective Equipment, Medical and First Aid, Sanitation, and Worker Housing.

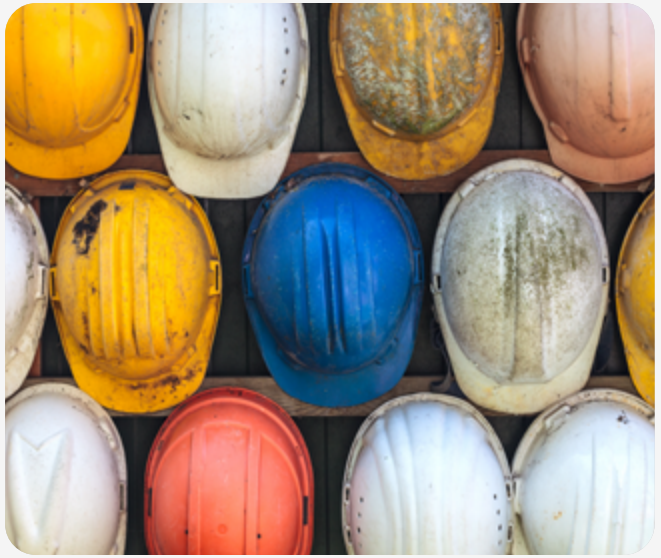
B. Two (2) or more Serious violations are related and the overall risk to workers is greater because the violations exist simultaneously versus if the violations had existed at separate times.*

C. One (1) or more Serious violations involve all of the workers/areas in the facility, or all of the workers/equipment/areas of a specific type or process.

Non-Systemic violations will remain as Serious violations.

Non-MCS

is applied to violations which are less egregious than the ratings above, but remain issues that should be addressed in order for the Facility to be in full compliance with the Code.



Where Code requirements deviate from local legal requirements, the stricter standard will apply. Violation ratings are periodically reviewed and updated. Please note that the violation examples contained in the Supplemental Guide are meant to be illustrative and not exhaustive. Disney reserves the right to make changes to violations and corresponding ratings at its discretion.

*Examples:
- Ventilation is insufficient for dust extraction in the polishing process (violation 1) while the workers involved in this process on the same floor are not provided with anti-dust masks (violation 2).
- Emergency lights are not functional (violation 1) while the inspection for the emergency lights on the same floor is not conducted regularly (violation 2).

Guiding Principle

Workers shall be provided with a safe and healthy working environment. Facilities must implement measures to prevent hazards and minimize workers' exposure to unsafe and unhealthy conditions in the workplace and in employer-provided housing.

Disney Code

The health and safety provisions of the Disney Code are:

Suppliers must provide workers with a safe and healthy workplace, taking all necessary steps required to ensure prevention or mitigation of injury or accidents that may arise fraom the course of their work, as well as provide guidance on proper chemical amanagement and disposal. At a minimum, Suppliers must provide workers with adequate and accessible restrooms, potable water, sanitary food preparation, storage and eating facilities, personal protective equipment, safe machinery and tools, training to prevent and mitigate accidents, adequate temperature control and ventilation, and sufficient lighting.

Suppliers must ensure that all living and dormitory spaces are clean, safe, and fit for the purpose. Spaces must be secure and allow reasonable freedom of movement to enter and exit.

Suppliers should create, maintain and execute emergency preparedness plans and procedures that are understandable to workers and clearly communicate the response procedures for various emergencies that may occur including fires, natural disasters, security, and health-related events. Suppliers should regularly assess whether buildings are structurally sound.

Glossary

Words bolded in the Key Compliance Benchmarks are defined in this glossary.

Confined space: The interior of a place such as a tank or a utility vault that is large enough for a worker to enter and perform work but is not designed for occupancy and has restricted means of entry or exit.

Control of hazardous energy (lockout/tagout): Workers who service or maintain machines and equipment may be exposed to serious injury or death if hazardous energy is not properly controlled. Lockout/tagout procedures require affixing the appropriate locks and/or tags to energy-isolating devices (for example, switches and valves), deenergizing machines and equipment before beginning work, and training all workers performing lockout/tagout procedures. Workers in the area where lockout/tagout is performed should be provided with awareness training.

Exit: A portion of the means of egress that is physically separated from all other spaces of the building. It provides a protected way of travel to the outside. This includes but is not limited to exit doors, exit passageways, and exit stairways.

First aid kit: A first aid kit contains supplies essential for providing first aid to injured workers, such as bandages, antiseptic, scissors, gloves, and hand sanitizer. The requirements for kit contents are contained in ANSI/ISEA standard Z308.1.

GHS: The UN Globally Harmonized System of Classification and Labeling of Chemicals (GHS) is an international system created by the UN to address the classification of chemicals by types of hazard and harmonize hazard communication elements, including labels and safety data sheets.

Hazardous energy: During the servicing and maintenance of machines and equipment, the unexpected startup or release of stored energy (e.g., electrical, mechanical, hydraulic, pneumatic, chemical, or thermal) can result in serious injury or death to workers.

Hazardous materials: Hazardous materials are liquids, solids and gases that present health and safety hazards to workers, property, or the environment. They include substances that are toxic, corrosive, combustible, flammable, reactive or explosive. These substances must be used safely to minimize the risk to workers and the environment during their handling, use, storage, transport, and disposal.

Hot work: Any work using open flame or heat sources that could ignite combustible materials. Examples of hot work include welding, cutting, brazing, pipe soldering, and metal grinding. All hot work should be approved by an authorized individual at the workplace who is trained on the necessary precautions for hot work management. This individual is responsible for granting permits when combustibles are removed from the work area where hot work is performed, wall and floor openings are covered, combustible floors are covered with fire-resistant materials, a fire extinguisher is readily available, a fire watch is provided, and any other necessary precautions are taken.

Housing (dormitories): Living accommodations provided or arranged by the employer for its workers. Worker housing is typically a shared accommodation, also known as a dormitory, with two or more workers per sleeping room, and common toilet and washing facilities.

Hygiene: Free of biological (bacteria and mold), infestations of insects or vermin, accumulations of trash, and chemical contaminants that can cause illness by inhalation, ingestion or skin contact.

Means of egress: A continuous and unobstructed path of travel from any point in a building to the outside. This includes the way of exit access, such as a corridor, the exit, and the exit discharge to outside the building.

Occupant load: Occupant load is defined as the number of occupants per story that the means of egress is expected to accommodate. For example, for a space with 400 occupants and two means of egress, the occupant load for each is 200. The minimum sizing of exit doorways, exit pathways and exit stairways is based on occupant load.

Safety Data Sheet (SDS): An SDS provides detailed information about a chemical to help ensure that all workers who handle chemicals have the hazard information they need to safely use, handle and store them. Some of the information they provide includes, physical data (e.g. flash point and vapor pressure), physical and health hazards, first aid measures, required personal protective equipment, and how to handle spills or leaks.

Worker-management health and safety committee:

- An effective way to improve company efforts to identify and control workplace health and safety hazards.
- Involve workers in accident investigation teams, in performing work area inspections, and in developing and implementing safe work procedures and other hazard controls.
- Helps the company track achievement of its health and safety objectives.

Key Compliance Benchmarks

GENERAL HEALTH & SAFETY

MCS | Serious | Non-MCS

Hazard Assessments

Serious — Workers regularly exposed to occupational hazards must be provided with health examinations and tested at the frequency determined by applicable laws and regulations, or at least in the following situations, whichever is stricter:

- Before being assigned hazardous work;
- Periodically while assigned to perform hazardous work;
- Upon reassignment back to non-hazardous work;
- At resignation or termination of employment; and
- Upon request by workers.

Non-MCS — Assessments to identify occupational health and safety (OHS) hazards must be conducted regularly to ensure ongoing compliance with applicable legal requirements. (Examples of common OHS assessments can be found in the Preventative Measures section of this chapter.)

Training & Communication

Non-MCS — Health and safety trainings must be provided for all workers and supervisors when hired, upon assignment to a new job, and on an annual basis thereafter.

Documentation

Non-MCS — Records of health and safety hazard assessments and work area inspections must be maintained.

Non-MCS — Records of internal and third party audits and compliance inspections by regulatory agencies must be maintained.

Non-MCS — Health and safety corrective and preventative action plans, including documented evidence of hazard control improvements, must be maintained.

Non-MCS — Records of health and safety training attendance and assessment of knowledge and/or skills (quizzes, tests, skills demonstrations) must be maintained.

Non-MCS — Records of self-assessments and other evaluations of compliance with the company's health and safety policies and procedures and compliance with applicable legal requirements must be maintained.

Non-MCS — A log of work-related accidents, injuries and illnesses, and copies of accident investigation reports and the actions taken to eliminate their root causes must be maintained.

Key Compliance Benchmarks

GENERAL HEALTH & SAFETY

MCS | Serious | Non-MCS

Work Environment

- All areas of the facility, including employer-provided **housing**, must be in compliance with the health and safety requirements outlined in this chapter and meet all applicable laws and regulations for occupant safety.
- Ventilation in the workplace must be maintained to control the levels (or concentrations) of airborne contaminants, temperature, noise, and other environmental factors within allowable limits as prescribed by applicable laws and regulations.
- Lighting must be provided at the level necessary to prevent eye strain and workplace accidents as required by applicable laws and regulations, and necessary for workers to perform their tasks effectively.
- Where proper controls cannot be feasibly maintained, appropriate procedures must be implemented to minimize adverse health impact to workers. For example, frequent rest breaks in a cooler shaded location and ample drinking water should be provided to those working in high temperature and/or humid environments.

Work Environment

- Elevated work areas, including scaffolds, mezzanines, and aerial platforms must have guardrails to prevent falls. Where guardrails are not feasible, workers working in such areas must be provided with appropriate fall protection devices.
- **Confined space** work must be evaluated for risks and appropriate control measures must be clearly communicated to workers and implemented (e.g., confined space entry procedures, permitting process, personal protective equipment) as required by applicable laws and regulations.

Key Compliance Benchmarks

FIRE & EMERGENCY SAFETY

MCS | Serious | Non-MCS

Emergency Procedures

- Serious: A written evacuation procedure based on potential emergency scenarios must be established.
- Serious: All workers, including new hires, must be trained on emergency evacuation procedures in a language they understand on an ongoing basis.
- Serious: Evacuation procedures and maps must be prominently posted in all occupied areas and be in a language understood by workers.
- Serious: Evacuation maps must indicate both primary and secondary **exit** routes, the locations of fire extinguishers and alarm points, and the designated assembly locations outside the building.

Evacuation Drills

- MCS: Evacuation drills must be conducted for the entire facility once every six months.
- MCS: Evacuation drills must include:
  - All workers;
  - All work shifts; and
  - All areas of the facility, including on-site and off-site employer-provided **housing**.

  Note: Large facilities and those with multiple shifts may need to conduct drills at different times to ensure all workers are included.
- Serious: Workers with disabilities or special needs must be pre-assigned a partner to assist them in evacuating during a drill and in case of an actual emergency.

Key Compliance Benchmarks

FIRE & EMERGENCY SAFETY

MCS | Serious | Non-MCS

Means of Egress

Means of egress and stairways must be fully accessible at all times and free from debris, clutter, equipment, and storage that may impede egress or present a fire hazard.

Emergency lighting for all **means of egress** pathways (e.g., aisles, corridors, **exit** stairways, and ramps) must be installed, functioning, inspected monthly, and powered by either battery or backup generator.

The minimum width of **exit** doorways and **exit** pathways must meet the stricter of local fire safety regulations or the widths in the following table[1]:

MINIMUM WIDTH OF EXIT DOORWAYS AND PATHWAYS	
Occupant Load per **Exit** Doorway or Pathway	Minimum Width
1 – 160 people	0.8 meters (32 inches)
161 to 200	1.0 meters (40 inches)
201 to 300	1.5 meters (60 inches)
301 to 400	2.0 meters (80 inches)
more than 400	**Occupant Load** times 5.1 mm (0.2 inches)

Means of Egress

The minimum width of all **exit** stairways must meet the stricter of local fire safety regulations or the widths in the following table[2]:

MINIMUM WIDTH OF EXIT STAIRWAYS	
Occupant Load per **Exit** Stairway	Minimum Width
1 – 50 people	0.9 meters (36 inches)
51 to 150	1.1 meters (44 inches)
151 to 200	1.5 meters (60 inches)
201 to 300	2.3 meters (90 inches)
301 to 400	3 meters (120 inches)
more than 400	**Occupant Load** times 7.6 mm (0.3 inches)

All **means of egress** pathways must be delineated and marked with arrows and signage to indicate the direction of travel to the nearest **exit**.

1 International Fire Code (2021), Section 1005 "Means of Egress Sizing"

2 International Fire Code (2021), Section 1005 "Means of Egress Sizing"

Key Compliance Benchmarks

FIRE & EMERGENCY SAFETY

MCS | Serious | Non-MCS

Emergency Exits & Exit Signs

Exit doors must:

- Be unobstructed and unlocked during working hours, including overtime hours, or whenever any workers are present in the facility;
- Open with one single motion (e.g., push on a panic bar, or turn a doorknob, or push down on a door handle); the use of keys, slide bolts and/or security codes to open the door are not permitted; and
- Open directly to an **exit** stairway or to the exterior of the building (i.e., they cannot open into another room or area, or into another building).

Facilities must have a minimum number of **exits** based on occupancy as detailed below[3]:

MINIMUM WIDTH OF EXITS	
Number of Occupants per Story	Exits per Story
1 - 500 people	Two (2)
501 to 1,000	Three (3)
Over 1,000	Four (4)

Emergency Exits & Exit Signs

Exit doors must open in the direction of evacuation (i.e., outward) and be side hinged (e.g., **exit** doors cannot be rolling or sliding).

Visible and illuminated signage must be posted at each **exit**.

The **exit**s must be as far apart as possible (e.g., for a space with two **exit**s, the **exit**s should be on opposite sides of the space).

For facilities without an automatic sprinkler system, sufficient **exit**s must be available to ensure that the maximum travel distance for a person to reach the nearest **exit** does not exceed 61 meters (200 feet)[4].

Emergency Equipment

Fire alarms must be clearly heard and visible from all areas of the facility and employer-provided **housing**, as required by applicable laws and regulations.

A fire alarm control panel, automatic fire sprinklers, smoke detectors and fire extinguishers must be installed as required by applicable laws and regulations.

3 International Fire Code (2021), Section 1006 "Numbers of Exits and Exit Access Doorways"

4 International Fire Code (2021), Section 1017 "Exit Access Travel Distance"

Key Compliance Benchmarks

FIRE & EMERGENCY SAFETY

MCS | Serious | Non-MCS

Emergency Equipment

- Maximum travel distance to a fire extinguisher cannot exceed 23 meters (75 feet)[5] or the distance required by applicable laws and regulations, whichever is shorter.

- Inspections of all **means of egress**, **exit** components, alarms, and fire detection and suppression systems must be performed on a monthly basis. The inspection program should include, but is not limited to:
  - An inventory of all **exit** components and emergency equipment
  - A checklist of the inspection and maintenance tasks to be performed for each item
  - Maintenance scheduling based on inspection outcomes
  - Maintenance of any legally required fire inspection certifications
  - Inspection and maintenance records, including the date, work performed (e.g., visual inspection, functional test, or type of maintenance or repair performed) and the name of the individual who performed the work

Emergency Equipment

- Testing and maintenance of sprinkler system components must be performed at a frequency recommended by the manufacturer or in accordance with applicable laws and regulations, whichever is stricter.

5 International Fire Code (2021), Section 906.3 “Portable Fire Extinguishers: Size and Distribution”

Key Compliance Benchmarks

HAZARDOUS MATERIALS

MCS | Serious | Non-MCS

Permits & Licenses

Permits, licenses, registrations and certifications for the storage, handling, treatment, and disposal of **hazardous materials** must be obtained and maintained as required by applicable laws and regulations.

Training & Communication

Workers working with **hazardous materials** must be trained on how to safely store, handle, transport and use such materials, including initial and refresher trainings and applicable certifications as required.

Hazards Management

Emergency response procedures must be established to manage spills, leaks and worker exposure to **hazardous materials** per applicable laws and regulations.

Hazards Management

Hazardous materials must be properly stored. This includes the following:

- Combustible and flammable materials such as paints, solvents, sawdust, and compressed gases must be stored in approved containers in rooms and storage areas away from open flames or other sources of ignition;
- Chemicals are stored only in containers approved for use with the specific type of chemical;
- Materials are separated by hazard class (e.g., organic acids must be segregated from flammables to prevent the release of toxic or flammable vapors in the event of a leak or spill); and
- Storage areas, rooms and cabinets are provided with secondary containment to prevent releases to the environment or mixing of incompatible materials in the event of a leak or spill.

A current inventory of **hazardous materials** that includes a list of materials in the workplace, where and how they are stored, and the volume of each material present must be maintained.

Key Compliance Benchmarks

HAZARDOUS MATERIALS

MCS | Serious | Non-MCS

Hazards Management

- The inventory of **hazardous materials** must be shared with local emergency response authorities where required by applicable laws and regulations.
- A **GHS**[6] compliant **Safety Data Sheet** (**SDS**) must be available for every hazardous material in the facility.
- **SDS** must be in the local language, in languages understood by the workers, and be immediately accessible to workers in all areas where chemicals are stored or used.

Hazards Management

- All containers of **hazardous materials** must be labeled with a **GHS**-compliant hazard label in the local language and in languages understood by the workers. Labels must include the following:
  - Signal word indicating the hazard level (e.g., Danger, Warning, etc.);
  - Hazard pictograms that illustrate the material hazard types;
  - Manufacturer information;
  - Precautionary statement and first aid instructions;
  - Hazard statements (for example, “Extremely flammable gas,” or “Toxic if ingested”); and
  - Product or chemical name

6 United Nations Globally Harmonized System (GHS) of Classification and Labelling of Chemicals

Key Compliance Benchmarks

MACHINE AND ELECTRICAL SAFETY

MCS | Serious | Non-MCS

Permits & Licenses	Serious	Machinery and electrical system permits, licenses, registration and certifications must be obtained and maintained as required by applicable laws and regulations.
	Serious	Where licensing or certification is required to perform a specific function (e.g., weld; operate any machinery, equipment or vehicle; or install, maintain or repair electrical equipment and systems), workers must be properly trained, licensed, and/or certified as required by applicable laws and regulations.
Training & Communication	Non-MCS	Machinery and electrical equipment must be provided with signs and labels indicating the hazards and necessary precautions.
	Non-MCS	All machinery and electrical equipment signs and labels must be in the local language and in languages understood by the workers.
Training & Communication	Non-MCS	Safe operating procedures for all machinery and electrical equipment must be up to date and readily available for workers who operate the machinery and electrical equipment.
	Non-MCS	All safe operating procedures for machinery and electrical equipment must be in the local language and in languages understood by the workers.
Machine Safety	Serious	Required machine safeguards must be securely in place, in good operating condition, effectively protect against identified hazards, properly utilized and maintained according to manufacturers' instructions or recommendations, and tested for proper operation at the start of every work shift.
	Serious	Higher risk processes such as welding, torch cutting, brazing and soldering must be conducted using proper safety measures, such as a "**hot work**" permit system.

Key Compliance Benchmarks

MACHINE AND ELECTRICAL SAFETY

MCS | Serious | Non-MCS

Machine Safety

Serious: All machinery must be reviewed for safety hazards, and safeguards must be provided to protect workers against the identified hazards. The types of hazards requiring safeguards include, but are not limited to:

- Hot surfaces
- Rotating parts, including in-running nip points
- Reciprocating and transverse motions
- Cutting, punching, shearing, and bending actions

Non-MCS: Detailed preventative maintenance records for all machinery and equipment safeguarding must be maintained, including, but not limited to, inspections, functional testing, and scheduled maintenance and repairs.

Electrical Safety

MCS: Electrical wiring and equipment in damp or wet locations must be approved for use in such locations in accordance with applicable laws and regulations.

Serious: All electrical wiring and equipment must be covered and insulated to prevent contact with exposed live parts, per applicable laws and regulations.

Electrical Safety

Non-MCS: Electrical equipment and installations must be maintained in a safe condition through a program of routine inspections and preventative maintenance at least annually or at a frequency recommended by the designer or manufacturer, whichever is more frequent.

Lockout/Tagout

Serious: **Lockout/tagout** procedures must be in place and followed to protect workers from unexpected energization, release of **hazardous energy**, or startup of machinery and equipment during repair and maintenance activities.

Key Compliance Benchmarks

PERSONAL PROTECTIVE EQUIPMENT (PPE)

MCS | Serious | Non-MCS

Personal Protective Equipment	Serious	Personal protective equipment (PPE) must be provided, maintained, and replaced at no cost to workers.
	Serious	Workers must be provided with PPE that is appropriate for the hazards involved.
	Serious	Workers must always wear PPE wherever its use is required by applicable law to protect the health and safety of workers against site-specific hazards.
	Non-MCS	PPE must be stored properly when not in use, inspected prior to each use, maintained to ensure ongoing effectiveness, and replaced as required.
	Non-MCS	PPE must fit workers properly to minimize exposure to hazards.
Training & Communication	Serious	Workers must be trained to properly use, store, and maintain PPE.
	Serious	In areas where PPE use is required, postings and signs about the hazard(s) and type of PPE required must be available in the language(s) understood by workers.

Key Compliance Benchmarks

MEDICAL AND FIRST AID

MCS | Serious | Non-MCS

Emergency Response	Serious	A sufficient number of licensed medical staff members must be on duty as required by applicable laws and regulations.
	Non-MCS	Workers requiring emergency medical attention must receive appropriate care by trained medical professionals in a timely manner.
	Non-MCS	Where professional medical attention is not immediately available for an injured or ill worker, first aid must be administered by trained facility first aid personnel in a timely manner.
First Aid Equipment	Serious	Where there is risk of **hazardous materials** exposure to eyes, face, or body, emergency eyewash and shower equipment must be available and maintained to function properly at all times.
	Serious	The travel distance from any point in the work area to the eyewash and shower equipment must not exceed 15 meters (55 feet) or 10 seconds of travel time in the event of an emergency[7].
	Non-MCS	**First aid kits** must be stocked with supplies appropriate for the hazards in each area, and be readily accessible in all areas, including worker **housing**.
First Aid Equipment	Non-MCS	**First aid kits** must be inspected and refreshed at least monthly, or more frequently if needed to ensure adequate amounts of necessary supplies are available and not expired.
Training & Communication	Serious	First aid training must be provided at least every three years to workers responsible for administering emergency first aid. Training may need to be conducted more frequently to ensure a sufficient number of trained facility first aid personnel on an ongoing basis.
	Serious	Workers handling **hazardous materials** must be trained on emergency procedures including the location and proper use of the eyewash and shower equipment.
	Non-MCS	Emergency phone numbers must be communicated to all workers and be visibly posted throughout the workplace and worker **housing** in languages understood by the workers (e.g., labels containing the number are affixed on all facility phones).
	Non-MCS	Signage for emergency equipment must be in languages understood by the workers.

7 American National Standards Institute (ANSI) / International Safety Equipment Association (ISEA) Z358.1 (2014) "Emergency Eyewash and Shower Equipment"

Key Compliance Benchmarks

SANITATION

MCS | Serious | Non-MCS

Toilet Facilities

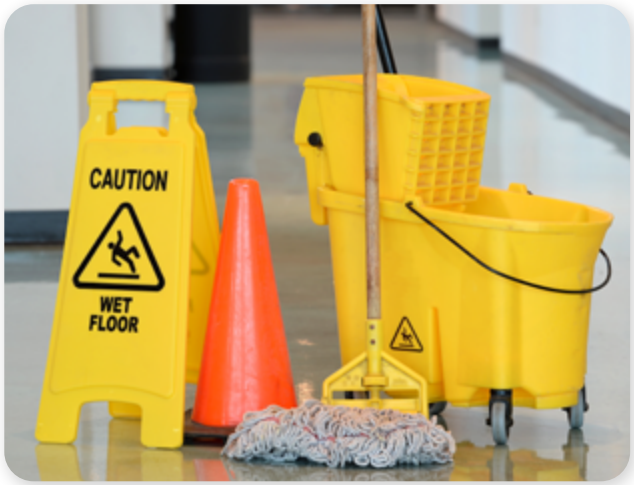
- An adequate number (at least 1 toilet for every 15 workers) of separate male and female toilet facilities must be provided to workers. Wherever possible, single stall bathrooms should also be provided.
- Toilet facilities in the workplace and employer-provided **housing** must be well-ventilated, well-lit, and have running water (including hot water where available), soap, toilet paper, and paper towels or other hand-drying equipment.
- Toilet facilities must be maintained in a sanitary condition, be cleaned twice daily (or more frequently as needed), and supplies replenished as needed.

Drinking Water

- Safe and potable drinking water must be readily available and accessible to workers at all times in the workplace and employer-provided **housing**.
- Periodic testing of drinking water must be conducted at least once per year to ensure that it meets local regulatory requirements for safe drinking water.

Dining & Food Preparation

- All food storage areas, food preparation areas, and worker eating areas must be inspected and cleaned frequently (for example, before and after each meal) to maintain sanitary conditions.
- Food handlers, cooks and servers must receive required medical examinations and be trained and certified in food safety as required by applicable laws and regulations.
- All necessary certificates and licenses as required by applicable laws and regulations must be obtained and maintained for canteens/kitchens.



Key Compliance Benchmarks

WORKER HOUSING

MCS | Serious | Non-MCS

Worker Housing

Employer-provided **housing** must be separated from buildings that contain production processes, warehousing, or chemical storage areas.

Employer-provided **housing** must be safe and secure. This includes, but is not limited to:

- A reasonable level of privacy
- A separate bed for each worker (sharing of beds by workers on different shifts – also known as “hot bedding” - is not permitted)
- Beds arranged no higher than two tiers
- Separate accommodations for men and women (both sleeping rooms and toilets)
- Adequate supply of potable water available at all times
- Ventilation, both natural and mechanical, to ensure sufficient air movement in all weather conditions

Worker Housing

Employer-provided **housing** must have a reasonable level of **hygiene** and comfort. This includes, but is not limited to:

- Adequate natural and artificial lighting
- A reasonable amount of personal space and personal storage for each worker
- Clean and sanitary toilet and washing facilities

Recommended Preventative Measures

Polices & Procedures

Policies

Develop formal and written policies that:

- Comply with applicable health and safety laws and regulations, including obtaining all required building construction, occupancy and equipment inspections, permits, certifications and licenses.
- Maintain a safe and healthy working environment and employer-provided housing, transportation, and food services.
- Provide emergency first aid as well as ongoing medical treatment and related services needed for a full recovery and return to work for workers who suffer work-related injuries and illnesses.
- Ensure workers' access to basic needs (e.g., toilet facilities and drinking water) is unrestricted.
- Provide workers with information and training on an ongoing basis about the health and safety hazards of their jobs and the precautions that are necessary to prevent injury or illness.

Procedures

In addition to the Compliance Benchmarks described above, develop and implement formal written procedures to:

- Routinely identify, track and comply with applicable health and safety laws and regulations.
- Regularly conduct assessments to identify occupational health and safety (OHS) hazards to ensure ongoing compliance with applicable legal requirements. The type of assessment should be appropriate to site operations and can include:
  - Job Hazard Analysis, which breaks jobs down into individual tasks to identify the hazards each task presents and how to eliminate or control the hazards
  - Industrial hygiene (occupational hygiene) surveys to measure exposures to health hazards such as dusts, vapors, gases, noise, and ionizing and non-ionizing radiation
- Review new equipment and chemicals to identify safety and health hazards in need of control before beginning to use them.
- Perform preventative maintenance for machine guarding, exhaust ventilation and other hazard controls.
- Identify training needs and deliver appropriate health and safety training, based on legal requirements, customer requirements, worker requests, and job-specific assessments of health and safety hazards.
- Provide, maintain, and replace as required, personal protective equipment where hazards cannot be controlled by engineering means.
- Ensure reporting and investigation of all work-related injuries and illnesses, including taking appropriate actions to prevent a recurrence.
- Encourage workers to report safety and health concerns or offer suggestions for hazard controls without fear of intimidation or reprisal.
- Perform structural integrity inspections of all buildings using visual and non-destructive testing methods (e.g., ultrasonic testing, electrical resistivity, and radiographic testing).

Recommended Preventative Measures

Accountability & Responsibility

- Assign accountability to senior management staff for achieving policy objectives and assign management and other staff for effective implementation of procedures.
- Assign a senior manager with overall responsibility and accountability for meeting policy objectives and overseeing how the system for managing health and safety is working.
- Ensure that managers, supervisors, and workers have clearly defined roles and responsibilities. For example, responsibility for ensuring workers are given appropriate personal protective equipment where it is needed, that they understand how to use the equipment and they use it consistently.
- Ensure that management takes into account suggestions from workers and addresses concerns in a timely manner.

Training & Communication

- Provide initial and ongoing training to all managers, supervisors and workers on the policy and the health and safety risks in the workplace that could result in illness or injury.
- Provide in-depth training for the staff responsible for implementing specific procedures. For example, workers that perform repairs and maintenance on equipment that could accidentally become energized and cause injury or death, must know how to follow lockout/tagout procedures to protect themselves and others nearby.
- Post the company health and safety policy and local laws and regulations where workers, on-site contractors and visitors can see them and in both the local language and the languages workers understand. For workers with difficulty reading, pictograms and photos can help. For example, pictures and symbols can help communicate workplace hazards such as noise or chemicals, and the types of protective equipment required.
- Encourage workers to report health and safety issues and to make suggestions for improving workplace health and safety practices.

Documentation

- Maintain a register of all applicable health and safety laws, regulations and Disney requirements.
- Maintain health and safety committee meeting minutes, action items, and attendance records.

Monitoring & Continuous Improvement

- Conduct regular internal or third party audits and assessments using qualified personnel.
- Set and measure progress on key performance indicators (KPIs). Examples of KPIs include the percentage of workplace accidents and incidents investigated for root cause, the number of corrective actions completed on time, the number of accidents and injuries resulting from the same cause, and the percentage of workers able to safely evacuate the workplace in the target time.
- Perform regular worker surveys to measure how satisfied they are with workplace conditions and practices and to understand what would help them do their jobs more safely and efficiently.
- Conduct periodic senior management reviews to evaluate system effectiveness and update policies and procedures.
- Take both corrective and preventative action to address each identified root cause so that problems do not recur. For example, a facility may first re-train night shift workers on proper health and safety practices (corrective action) and then review night production quotas and work schedules to eliminate tiredness or working too fast as causes of injuries (preventative actions).
- Assign task owners, milestones, and completion dates for any corrective and preventative actions.
- Ensure that workers know how to follow any new or revised procedures that have been developed to address risks through initial and refresher training as needed.
- Measure whether the adjustments in procedures and supporting training are producing desired results.

Resources

Disney Resources

Disney International Labor Standards Program Manual

European Union Agency for Health and Safety at Work

EU-OSHA

International Labour Organization (ILO)

Occupational Safety and Health

Guidelines on Occupational Safety and Health Management Systems (ILO-OSH 2001)

International Organization for Standardization (ISO)

ISO 45001 – Occupational Health & Safety

Social Accountability International (SAI)

SA8000 Standard

United States Occupational Safety and Health Administration (OSHA)

Safety and Health Topics

APPENDIX 1

SUMMARY OF CHANGES IN THE SEPTEMBER 2024 UPDATE

The Disney International Labor Standards Supplemental Guide has been updated to provide additional information regarding Systemic, Non-Systemic, and Serious violations and a clarification regarding the hazard assessment benchmark.

The following summarizes the updates made in the latest version of the Health and Safety Supplemental Guide.

UPDATES AS OF SEPTEMBER 2024

1. 'Serious' Rating for the Health and Safety Violations (Page 4 in the chapter)

Serious is applied to violations that are not MCS violations and may significantly impact worker safety if not addressed promptly.

When three (3) or more Serious violations are identified in a single audit, if any such Serious violation is Systemic then such Serious violation will be rated as an MCS violation.

"Systemic" means any of the following:

A. Three (3) or more Serious violations are from the same category of violations as listed in this chapter, i.e. General Health & Safety, Fire & Emergency Safety, **Hazardous Materials**, Machine and Electrical Safety, Personal Protective Equipment, Medical and First Aid, Sanitation, and Worker Housing.

B. Two (2) or more Serious violations are related and the overall risk to workers is greater because the violations exist simultaneously versus if the violations had existed at separate times.

C. One (1) or more Serious violations involve all of the workers/areas in the facility, or all of the workers/ equipment/areas of a specific type or process.

Non-Systemic violations will remain as Serious violations.

2. Hazard Assessment Compliance Benchmark (Page 7 in the chapter)

- New text (indicated in *italics* below) has been added to the Hazard Assessment benchmark to clarify applicability when there is a discrepancy between the situations described in the chapter and local laws/regulations:
  - Workers regularly exposed to occupational hazards must be provided with health examinations and tested at the frequency determined by applicable laws and regulations, or at least in the following situations, *whichever is stricter*:"

APPENDIX 2

FREQUENTLY ASKED QUESTIONS RELATED TO THE SEPTEMBER 2024 UPDATE

1 Why is Disney updating the Health and Safety Supplemental Guide?

Disney periodically reviews ILS Program requirements and their implementation. The primary focus of this update is the criteria by which Serious violations are rated as MCS violations:

- Previously, when three (3) or more Serious violations were identified in an audit, they were each rated as an MCS violation and remediation of ALL Serious Health and Safety violations was required before the applicable follow-up (i.e., subsequent) audit.
- Under the update, violations are assessed more individually. When three (3) or more Serious violations are found in an audit, then each Serious violation that is a Systemic violation is rated as an MCS violation, while Serious violations that are not Systemic violations are not rated as MCS violations. This adjustment helps to ensure that violations posing the greatest risks to workers' health and safety are properly rated as MCS violations while continuing to encourage improvement for Non-Systemic Serious violations.

2 In addition to the update regarding rating some Serious violations as MCS violations, has the number of Serious benchmarks increased?

No, Disney has not added any new Serious benchmarks.

3 How do I remediate the Systemic Serious violations (i.e., that are rated as MCS violations)?

To remediate the Systemic Serious violations, actions must be taken to correct the violations identified. In the follow-up/subsequent audit, the corrective actions taken will be reviewed to determine whether there are three or more Serious violations that are Systemic. If there are fewer than three Serious violations indicated in the follow-up/subsequent audit report, or if the violations are no longer Systemic, then they will no longer be rated as MCS violations; for example if:

- Scenario 1: Remediation has occurred, and there are fewer than three Serious violations indicated in the follow-up/subsequent audit report.
- Scenario 2: There are still three or more Serious violations indicated in the follow-up/subsequent audit report, but all Systemic Serious violations have been remediated.

4 Will Disney accept a desktop audit following an audit that indicated that a facility failed to meet MCS due to Health and Safety violations?

No. In cases where a previous audit has confirmed MCS violations, subsequent audits are to be conducted on-site.

5 How is the effective date of the update applied?

The effective date September 1, 2024, refers to the date when the updated standard applies to all the ILS audit reports reviewed by Disney, regardless of when the audits were conducted. This includes audit reports submitted by Licensees/Vendors and those commissioned by Disney. Therefore, any audit reports reviewed by Disney on or after September 1, 2024 will be subject to the updated standard.

6 If an ILS audit report was submitted and reviewed before September 1, 2024, is it possible to amend the results based on the update?

No. If an ILS audit report has already been submitted and reviewed before September 1, 2024 the results may not be amended based on the update. However, the update will be applied to all the ILS audit reports reviewed by Disney on or after September 1, 2024. If there are any special cases or specific circumstances that merit consideration, please contact your local ILS representative for further assistance.

APPENDIX 2

FREQUENTLY ASKED QUESTIONS RELATED TO THE SEPTEMBER 2024 UPDATE

7 Can you provide examples of Systemic violations?

A. **Three (3)** or more Serious violations are in the same category. There are 8 categories in the Health and Safety Supplemental Guide. The following are examples of 3 Serious violations from the Fire & Emergency Safety category that together comprise a Systemic violation:

- Emergency lights are not regularly inspected.
- Fire extinguishers are not functional.
- **Exit** door does not open in the direction of the evacuation path.

B. **Two (2)** or more Serious violations are related and the overall risk to workers is greater because the violations exist simultaneously versus if the violations had existed at separate times. For example:

- Ventilation is insufficient for dust extraction in the polish process (violation 1)
- Workers involved in this process on the same floor are not provided with anti-dust masks (violation 2)

B. **One (1)** or more Serious violations involve all of the workers/areas in the facility, or all of the workers/equipment/areas of a specific type or process. For example:

- If appropriate masks or air-purifying respirators are not provided to any worker in the spray painting process who is in contact with chemical vapor on the 2nd floor, it would be considered a Systemic violation. In this example, all workers involved in the spray painting process are affected, making it a Systemic violation.

8 If there are three or more Serious violations indicated in an audit report, will the absence of the building and/or fire certificate be rated as an MCS violation?

Yes, the absence of the building and/or fire certificate is a Systemic violation and if there are three or more Serious violations indicated in an audit report, then it would be rated as an MCS violation. This violation is Systemic because it has an impact on all areas of a building or facility.

9 Will the updated policy be communicated to the facilities?

We expect Licensees and Vendors to communicate the updated policy to the facilities they use. In the meantime, if training sessions are scheduled for the facilities by Disney, they will include the updates on Health and Safety.

The Walt Disney Company

International Labor Standards
Health and Safety
SUPPLEMENTAL GUIDE

To access other ILS Guidebook chapters, click here

Revised April 2025