



ISO 14001

Environmental Management System Manual



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1.0 Introduction

STAPLES Center (SC) and Microsoft Theater (MT), are wholly owned subsidiaries of the Anschutz Entertainment Group (AEG), and the anchor venues of the L.A. LIVE entertainment district in the heart of downtown Los Angeles, California. Since its debut in October of 1999, STAPLES Center has established itself as a world-class sports and entertainment arena- hosting four professional sports franchises and over 250 events a year. With its success, STAPLES Center has enhanced the perception of downtown Los Angeles and has completely transformed the adjacent South Park neighborhood. As a leader in both its industry and its community, STAPLES Center is committed to help improve local economic, social and environmental conditions.

In October of 2007, AEG and STAPLES Center's operations and event management staff opened Nokia Theatre L.A. LIVE, now named Microsoft Theater as of June 9, 2015, which quickly became home to some of the best Los Angeles concerts, performances and awards shows—including the American Music Awards and the Primetime Emmy Awards. Being run by the same upper-level management, Microsoft Theater has had the same level of commitment to excellence, including active involvement in the local community and environmental programs.

STAPLES Center and Microsoft Theater operations and engineering teams have worked with AEG's corporate sustainability team to implement environmental programs throughout the venues. In 2007, AEG's corporate sustainability team launched AEG 1EARTH and defined 2020 environmental Vision Goals companywide, including the implementation of Environmental Management Systems. STAPLES Center and Microsoft Theater are the first venues of their kind to develop an EMS and achieve ISO 14001 certification.

STAPLES Center and Microsoft Theater's EMS is based on the requirements of the ISO 14001:2004 Environmental Management System Standard and AEG 1EARTH's overarching 2020 Vision Goals.

1.1 Scope

The scope of this EMS includes all STAPLES Center (SC) and Microsoft Theater (MT) departments, partners and tenants that operate within the sports and entertainment complex & theater. All SC and MT departments and operating partners that have facility management responsibilities are expected to have full working knowledge of the EMS. In the EMS documents, the SC and MT departments are listed based on the activities, procedures and policies they influence. These include Operations, Engineering, Security, Guest Services, HR & Administration, Premium Sales & Event Suites, Event Management (representing Event Booking, Communications and Event Services), Transportation & Parking, Ticketing & Box Office, Merchandise, Event Media (representing Event Presentation, Broadcast & Telecommunications) and MT Event Operations.

The operational partners include Levy Restaurants providing food & beverage services and ABM providing housekeeping services, respectively. Tenants and their employees who utilize the facilities but don't control their operations are not expected to have the same level of EMS awareness as SC and MT Employees or their operating partners. These tenants include The Los Angeles Clippers, The Los Angeles Kings, The Los Angeles Lakers, The Los Angeles Sparks, and The Nike Vault.

ISO 14001 requirements are documented in this EMS Manual and implemented through programs and procedures outlined in EMS documents.

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2.0 AEG Environmental Policy and corporate commitments

AEG's Environmental Policy is relevant for all AEG entities including STAPLES Center (SC) and Microsoft Theater (MT). The policy demonstrates top-level commitment to improve environmental performance and guides the efforts of this EMS. Through this policy, AEG commits to: the prevention of pollution; regulatory compliance; continual improvement; and compliance with voluntary requirements to which the organization subscribes. The policy is posted in public locations around SC and MT and is available on the STAPLES Center and AEG websites.

2.1 Related Documentation:

- Environmental Policy (see next page)

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Environmental Policy

Giving Our World Reason to Cheer!

As a leader in the live sports and entertainment industry, AEG recognizes its responsibility to improve the economic, social and environmental well-being of the various communities in which we do business.

AEG aims to set the standard for live entertainment, providing the best possible guest experience while embracing environmental sustainability. AEG 1EARTH is AEG's environmental commitment to conduct our business with the understanding that we are all part of 1EARTH. We balance economic performance with environmental health and community well-being. We conserve vital resources such as energy and water and sustain a culture of environmental stewardship - reducing and recycling waste, fighting global warming and educating our guests and employees.

Each year, millions of people visit AEG venues, attend AEG Live promoted concerts, support AEG Sports' franchises and participate in AEG produced events. By demonstrating we can provide world-class entertainment that is also environmentally responsible, we strive to educate and inspire our guests to join us and do their part as we move down the road toward sustainability.

AEG 1EARTH ensures we commit to the following principals:

- Continual improvement and review of environmental performance in business operations
- Compliance with all environmental regulations and policies
- Integration of best management practices into our operations using pollution prevention and environmental sustainability strategies as core objectives
- Responsiveness to the environmental concerns and priorities of the company's stakeholders, clients, guests and employees

Dan Beckerman

**Chief Executive Officer
AEG**

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3.0 Environmental aspects

Environmental aspects are elements of SC and MT activities, products or services that interact with the environment. Only aspects over which SC and MT have direct control, or a high degree of influence through regular business operations, are considered. Changes to the environment, either adverse or beneficial, that result wholly or partially from SC and MT environmental aspects are called environmental impacts. Significant environmental aspects are those aspects that can have a significant impact on the environment.

The relationship between aspects and impacts is one of cause and effect. We have further defined our aspects into two categories: those that mitigate a specific impact (e.g. consumption of water) and those that foster a positive benefit across many areas of impact (e.g. environmental education). We did this to highlight the importance of specific programs around green procurement, environmental education and green building & renovation.

SC and MT Environmental Aspects and Impacts are reviewed when the facility's Objective and Targets expire, typically at the conclusion of a 3-5 year time period. The Sustainability Programs Manager is responsible for this review which it conducts with the guidance and final approval of the departmental heads at the facility. Following approval from departmental heads, the new Objectives and Targets are presented to the President.

SC and MT follow the procedure below (see section 3.1) to determine if an aspect has a significant environmental impact. The following documents associated with the Environmental Aspects and are available on the SC and MT EMS page through the STAPLES Center website:

3.1 Procedures to identify significant aspects

To identify **significant environmental aspects**, the following procedure will be followed:

- Identify all activities within the scope of the EMS.
- Identify potential aspects and impacts associated with each activity.
- Determine applicable federal, state and municipal regulations associated with each impact.
- Identify which aspects are significant by ranking the aspects and impacts associated with each activity. Rankings should consider probability and consequence of the impact occurring.
- Determine which aspects SC and MT can reasonably control or influence.
- Build environmental objectives and targets around the operation's significant aspects.

3.2 Related Documentation:

- SC and MT Activities and Impacts
- SC and MT Environmental Aspect Ranking
- SC and MT Significant Aspects

4.0 Legal and other requirements

SC and MT operate under the legal requirements of the Federal Government, the State of California, and the County and City of Los Angeles. There are also voluntary best management practices and other requirements we choose to subscribe to, for example, the ISO 14001 Standard. To ensure that we are in compliance with all legal and other requirements, SC and MT have established a process to identify and maintain a list of these requirements.

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Microsoft
Theater



4.1 Procedures to identify legal and other requirements

It is the responsibility of the Sustainability Programs Manager, the VP of Operations and the VP of Engineering—the “EMS management team”—to review and update the Legal and Other Requirements annually. Updates to the Legal and Other Requirements are gathered through corporate communications, liaison with city and county official and internal and external audits. The Legal and Other Requirements will be presented to the Departmental Heads for review at the Annual Management Review. Legal and Other Requirements are summarized in a document and available on the STAPLES Center EMS website.

4.2 Related documentation

- Legal and Other Requirements

5.0 Objectives, targets and programs

The AEG 1EARTH environmental program identifies 2020 Environmental Vision Goals for the company as part of its commitment to continual improvement set forth in AEG’s Environmental Policy. The AEG 1EARTH environmental program also works with AEG entities, such as STAPLES Center (SC) and Microsoft Theater (MT), to identify and document specific objectives and targets for environmental performance.

5.1 AEG 1EARTH 2020 Environmental Vision Goals

Energy and Climate

- 20 percent reduction in greenhouse gas emissions (CO2 intensity)
- 15 percent of all electricity usage derived from renewable energy sources

Recycling and Waste Diversion

- 25 percent of all solid waste diverted from the landfill
- 75 percent waste to landfill diversion at 50 percent of facilities
- Zero hazardous waste generated

Water Conservation

- 20 percent reduction in water use intensity

Sustainable Purchasing

- 50 percent of total dollars spent on designated “high impact products and services” will be environmentally preferable

Education

- 100 percent of AEG Facilities & Venues include environmental messaging and information

* All goals use a baseline year of 2007

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5.2 STAPLES Center & Microsoft Theater Objectives and Targets

The Objectives and Targets document is the “action plan” of the EMS, establishing time frame and responsibility for continued environmental improvement. The Objectives and Targets are established for a specific period of time, generally between 3-5 years, and take into account each significant environmental aspect and impact associated with the facilities’ activities. It is the responsibility of the departmental heads at SC and MT with the assistance of the Sustainability Programs Manager to identify “objectives” which are long-term goals pertaining to the environment as well as short-term, activity-specific and quantifiable targets designed to achieve those objectives.

Progress toward the Objectives and Targets is reviewed annually by the departmental heads at SC and MT with the support of the Sustainability Programs Manager. Progress is summarized in the form of an Annual Performance Report document and submitted to the President of STAPLES Center & Microsoft Theater for review during the Annual Management Review.

After the Objectives and Targets expire at the conclusion of the designated time period (generally between 3-5 years), the facilities’ overall progress toward the goals is reviewed. Any changes in Scope of the EMS, Aspects and Impacts and feedback from internal or external parties will be taken into consideration. Progress toward the Objectives and Targets established for that time frame will be summarized in a Performance Report and presented to the President for review. This Performance Report is used as a tool for establishing new Objective and Targets.

The list of current Objectives and Targets is accessible on the STAPLES Center EMS website and minutes from the Annual Management Review are available upon request from the Sustainability Programs Manager.

5.3 Related Documentation

- Objectives and Targets
- Annual Management Review Minutes

6.0 Resources, roles, responsibility and authority

6.1 Roles and responsibilities

Environmental responsibilities must be defined, documented, and communicated to ensure effective environmental management. Management ensures the availability of resources essential to establish, implement, maintain and improve the EMS. Roles and responsibilities are assigned as described in:

- 1) The EMS Manual
- 2) SC and MT Objectives and Targets
- 3) The EMS Training Requirements Matrices
- 4) Operational Controls (environmental plans and instructions)
- 5) Emergency Procedures

6.2 Responsibilities Overview

Role of Departmental Heads & Provision of Resources: SC and MT Departmental Heads and representatives from operational partners Levy Restaurants and ABM meet periodically to review the effectiveness and implementation of the Environmental Management System. Each department head has the authority to make changes

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within their department to ensure Objectives and Targets established for their activities are met. Responsibility for ensuring that the sufficient resources exist for the Departmental Heads to implement and maintain the EMS is the joint responsibility of the President and the AEG Sustainability Department.

The list of STAPLES Center and Microsoft Theater Departmental Groups includes:

- Operations
- Engineering
- Security
- Guest Services
- Human Resources & Administration
- Premium Sales & Event Suites
- Event Management (representing Booking, Event Services, and Communications)
- Transportation & Parking
- Ticketing and Box Office
- Merchandise
- Event Media (representing Broadcast, Event Presentation, and Telecommunications)
- Food & Beverage (Levy Restaurants)
- Housekeeping (ABM)
- Microsoft Theater (Event Operations)

Role of Full Time Employees: SC and MT employ approximately 277 Full Time employees. SC and MT operational partners also employ Full Time employees. The EMS requires Full Time employees complete the training required by the EMS Training Matrices. In addition, Full Time employees are responsible for supporting their Department's environmental Objectives and Targets. While these employees do not have authority to make changes within the department, they are encouraged to make suggestions to their departmental head. The Full Time employees include:

- Full Time SC and MT employees
- Full Time Levy Restaurant employees
- Full Time ABM employees

Role of Part Time Employees: SC and MT employ approximately 1,200 Part Time employees (with up to approximately 750 working on a single event day). Levy and ABM also employ Part Time employees. The EMS requires Part Time employees complete the training required by the EMS Training Matrices. Part Time employees are expected to have a basic level of awareness of the EMS (see Competence, Training and Awareness 7.0 below) and be able to cite examples of the environmental responsibilities of their job function. Part Time employees have the authority to take action within their job description to reduce the venues' environmental impact (i.e. recycling, turning off lighting or energy consuming devices etc.). Part Time employees are also encouraged to make environmental improvement suggestions to their supervisors. The Part Time employee count for an event day includes:

- Part Time SC and MT employees
- Part Time employees of Levy Restaurants and ABM

Role of Full Time and Part Time Employees of Third Party Tenants

Full and Part Time employees of STAPLES Center's third-party tenants are not expected to have the same level of EMS awareness as STAPLES Center & their operational partners' employees. Third-party tenants who only occupy STAPLES Center for their respective events ("event-based tenants"), will be made aware of the Environmental

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Management System, and they will be encouraged to participate in the program where they can. Event-based, third-party tenants include:

- The Los Angeles Lakers
- The Los Angeles Kings
- The Los Angeles Sparks
- The Nike Vault

Full and Part Time employees of third party tenants that occupy STAPLES Center during normal business hours (“day-to-day tenants”) as well as for their respective events will be encouraged to participate in the Environmental Management System and offered assistance to implement similar initiatives in their office spaces (at their discretion). Day-to-day, third-party tenants include:

- The Los Angeles Clippers

Microsoft Theater does not have third-party tenants.

6.4 Role of Contractors, Suppliers and Vendors

Contractors, Suppliers and Vendors of SC and MT will be made aware of the Environmental Management System and their role. These requirements will be communicated by written correspondence annually and upon any significant change in scope to the Environmental Management System. Since each Department manages their own relationships with their respective external parties, Department Heads have the authority to personalize the written correspondence with the assistance of the Sustainability Programs Manager and available templates.

6.4 Related Documentation

- Annual Update Letter to SC and MT Contractors, Suppliers and Vendors Templates
- EMS Training Matrix Full Time Employees
- EMS Training Matrix Part Time Employees

7.0 Competence, training and awareness

Basic EMS training needs for employees have been identified and must be delivered for the EMS to be successful. Training needs are documented in EMS Training Matrices and determined based on the employee’s full or part time status and department. Human Resources and departmental heads will keep training records in order to demonstrate that the required training has been delivered and employees are qualified to perform their jobs. SC and MT employees must be aware of:

- SC and MT’s Environmental Management System and the AEG 1EARTH environmental program
 - The importance of their role in conforming with policies and procedures and achieving environmental objectives and targets
 - The consequences of departure from specified operating procedures
- The significant environmental impacts of their department
- Their role in the emergency procedures

At a minimum, training needs will be reviewed during the Annual Management Review and in the event of a significant change in activities or scope.

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7.1 Delivery and Record of training

Full Time Training: All Full Time employees receive annual Environmental Awareness Training and Emergency Preparedness training. New-hire Full Time employees receive this training via SC and MT New Hire Orientation run by HR.

Additional trainings are listed by department on the EMS Training Matrices. This includes trainings such as those required by regulatory bodies for employees who perform skilled tasks in potentially hazardous working conditions. Where external certificates or licenses are required by law to perform specific job functions, these certificates and licenses will be kept up-to-date, and records will be maintained by the head of the respective department.

Part Time Training: All Part Time staff receive annual Environmental Awareness Training and Emergency Preparedness training. New-hire Part Time employees receive this training via SC and MT New Hire Orientation run by HR. Additional trainings are listed by department on the EMS Training Matrices.

Key training materials for Full and Part Time employees are available on the STAPLES Center EMS website. Delivery methods for training include:

- Annual refresher training, which may be a stand-alone training delivered by the Sustainability Programs Manager or integrated into existing departmental meetings, communications or trainings
- On-going assessment and delivery of training by Human Resources
- On-going assessment and delivery of training by Departmental Heads

7.2 Related documentation

- EMS Training Matrix Full Time Employees
- EMS Training Matrix Part Time Employees

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8.0 Communication

8.1 Internal communication process

Procedures for internal communications are required to ensure all departments and employees are aware of relevant EMS policies, plans, aspects, projects, targets, progress on targets, regulatory issues and any activities that could cause a significant impact on the environment. The primary method made available for internal communication with staff is the EMS website. Other effective communication methods include:

- E-mail and bulletin board postings
- Department-specific, web-based portals/pages
- SC & MTs' websites
- Eco-Comments Box located at the Eco "Green" Wall
- the SC/MT Green Team Email Address
- SC/MT Green Team meetings & "Eco-Challenge" Activities
- SC and MT department meetings & pre-shift meetings
- EMS Management Review Meetings
- The SC and MT Annual Performance Reports
- Bi-Annual Corporate Sustainability Report and AEG Website

8.2 External communication process

A process is in place to ensure relevant external communication is received, documented and responded to. This is especially critical where a potential environmentally related regulatory or public relations issue could arise. Who responds to external communication will be decided by the Head of Marketing and Communications and the relevant Departmental Heads including the AEG Sustainability Department depending upon the situation and potential ramifications of actions taken.

It is the responsibility of all parties mentioned above to ensure that any environmental communications that could potentially have legal ramifications are forwarded to General Counsel and that copies are kept on file. The chain of command for external communications generally follows this pattern:

- Day to day communication:
 - SC & MT President
 - SC & MT Heads of Marketing & Communication
- Media on environmental performance:
 - Head of AEG 1EARTH
 - SC & MT President
 - SC & MT Heads of Marketing & Communication
- Company-Sensitive Communication
 - SC & MT President
 - AEG CEO

8.3 External Communication Channels

SC and MT will communicate with external parties including media and guests regarding the venues' significant environmental impacts and efforts to reduce those impacts. SC and MT will use the channels listed below to distribute this messaging:

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- Signage
- Product Labeling
- AEG 1EARTH Sustainability Report
- SC and MT social media outlets
- SC and MT press releases
- STAPLES Center In-Building Public Service Announcements
- SC and MT's interior video screens/TVs
- SC and MT Websites

The STAPLES Center website will include a section for general guest feedback where any member of the public can enter comments. Comments related to sustainability will be flagged, brought to the attention of the Sustainability Programs Manager, collated and reviewed at SC and MT Environmental Management System meetings and the Annual Management Review. Corrective Action Requests (CARs) will be issued for significant comments.

9.0 Documentation

EMS documents are managed electronically by the appointed Sustainability Programs Manager. A Master List of EMS Documents will be maintained and kept up-to-date as documents are updated or replaced. The Departmental Heads, with the assistance of the Sustainability Programs Manager, are responsible for updating EMS documents as needed. If an EMS document undergoes a significant edit, changes will be communicated to employees verbally, through email communications, or through the EMS website.

A portion of EMS documents are available to all employees through a password protected webpage on the STAPLES Center website. The Environmental Management System documentation available on the website includes:

- The AEG 1EARTH Environmental Policy
- EMS Aspects and Impacts
- Objectives and Targets
- Legal & Other Requirements
- The EMS Manual
- Training Matrices
- Additional documents to ensure the effective planning, operation and control of processes that relate to SC and MT significant environmental aspects, including records required by ISO 14001

These documents will be reviewed:

- As needed to achieve continual improvement of the EMS
- In preparation for the Annual Management Review
- Upon a significant change in activities or scope

9.1 Document Control

The ISO 14001 Standard requires that documents essential to the EMS are controlled in revision and distribution and that the following rules are adhered to:

- Documents must be easily located

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- Documents must contain a unique title and current revision date
- Documentation must be legible, maintained in an orderly manner, and retained for a specified period
- Documents must be periodically reviewed, revised as necessary, and deemed adequate by relevant department head
- Documents must be current and located where operations essential to the EMS are performed
- Obsolete documents must be promptly removed from all points of use, or otherwise assured against unintended use
- Retained obsolete documents must be suitably identified to protect against use

Note: Documents as opposed to “records” are subject to revisions and addendum. Refer to section 15 for records control procedures.

9.2 Related documentation

- Mater List of EMS Documents

10.0 Operational control

“Operational controls” is a term used to describe the body of plans, instructions and other EMS procedures. These documented controls ensure the STAPLES Center and Microsoft Theater are operating in a way that controls or reduces the environmental impacts of its activities. The most commonly referenced operational controls at SC and MT include Environmental Guidelines & Procedures as well as Emergency Procedures. Key operational controls will be available to employees through the password protected employee portion of the STAPLES Center EMS website. *(Note: for security reasons, Emergency Procedures will not be provided in full on the EMS website—hard copies are provided each department’s management team for communication to their staff, and additional copies can be obtained from the Guest Services & Security Heads.)*

10.1 Related documentation

- STAPLES Center’s EMS website

11.0 Emergency preparedness and response

The ISO 14001 Standard requires that procedures to identify and respond to accidents and emergency situations and prevent or mitigate any potential environmental impact must be established and maintained. Prevention measures include conducting a minimum of one fire or emergency evacuation drill/exercise per year. SC and MT will also conduct emergency generator tests in accordance with city and county requirement. These drills/exercises and tests, including areas of shortcomings and successes, will be documented and retained as records.

To meet this requirement, SC and MT maintain the following controls:

1. SC and MT Emergency Procedures Manuals
2. Emergency generator testing procedures
3. Safety Data Sheets (SDSs)—formerly known as Material Safety Data Sheets (MSDS)

As a minimum, these controls will be reviewed:

- Annually

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- Upon a significant change in activities or scope
- As required to demonstrate continual improvement following a drill, accident or emergency

11.1 Related documentation

- STAPLES Center Emergency Procedures Manual
- Microsoft Theater Emergency Procedures Manual
- STAPLES Center Generator Testing Procedure
- Microsoft Theater Generator Testing Procedure
- STAPLES Center SDS Inspection Procedure
- Microsoft Theater SDS Inspection Procedure

12.0 Monitoring and measurement

Information crucial to the monitoring and measurement of Objectives and Targets is tracked and recorded through AEG Ecometrics. SC and MT report approximately 30 metrics monthly to AEG Ecometrics, including resources consumed such as electricity, fossil fuels, water and natural gas, as well as wastes generated such as landfill waste, recyclables and hazardous and universal wastes. Normalization factors, such as days of operation and total number of events, are also tracked. AEG Ecometrics allows SC and MT to calculate their carbon footprints, review trends, identify anomalies, and demonstrate continuous environmental improvement over time.

12.1 Annual Performance Report for STAPLES Center and Microsoft Theater

The Sustainability Programs Manager will utilize AEG Ecometrics data to generate a Performance Report summarizing progress toward the facilities' Objectives and Targets each year. The report will be produced in collaboration with the SC/MT Head of Marketing and be submitted to the President for review.

12.2 Calibration of monitoring equipment

SC and MT do not currently have any pollution control or other environmental equipment that requires calibration. This section of the ISO 14001 Standard is not applicable to SC and MT operations.

12.3 Related documentation

- AEG Ecometrics Overview
- Annual Performance Reports

13.0 Evaluation of compliance

SC and MT are committed to compliance with identified legal and other requirements. Procedures to periodically evaluate our compliance with applicable requirements to which our organization subscribes include:

- Annual Internal and External EMS audits
- Annual review of legal and other requirements

Any finding from inspections and audits will become EMS nonconformities.

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13.1 Related documentation

- Legal and Other Requirements

14.0 Nonconformity, corrective and preventive action

SC and MT activities may be determined, through inspection, monitoring, audit or other means, to be in nonconformity with the requirements of this EMS. An EMS nonconformity is any event or action at SC and MT that is incongruent with the requirements of the EMS, including legal and other requirements. The identification of nonconformities should trigger corrective action before they become environmental incidences. All Department Heads are responsible for identifying nonconformities with the EMS, bringing these to the attention of the Sustainability Programs Manager and, if relevant, to the AEG Sustainability Department, and working with the Sustainability Programs Manager to develop corrective actions.

14.1 Reporting nonconformities

Corrective or preventive action taken to eliminate the causes of actual and potential nonconformities shall be appropriate to the magnitude of the problem. Any changes in the documented procedures resulting from corrective and preventive action will be implemented and recorded. Tracking of EMS nonconformities will be accomplished using the Corrective Action Request (CAR) form.

The CAR form is available online through the employee password protected section of the STAPLES Center EMS website, on the Operations shared drive, or from the EMS management team. The form must be completed fully and tracked through completion. Once the form is complete, it becomes an environmental record and should be emailed to the Sustainability Programs Manager who will track all CAR forms. The following information should be included on the CAR:

- Finding, including root cause
- Date of finding
- Specific area/department
- Responsible Department(s) and contact(s)
- Corrective action
- Results of corrective action
- Targeted completion date and actual date closed

14.4 Environmental incidents

An environmental incident results from an event where environmental damage or potential environmental damage (a close call) occurs. For SC and MT, an incident occurs whenever any of the following happens:

- Environmental damage resulting from EMS nonconformity (i.e. not following existing procedures)
- Damage to the environment that triggers any regulatory threshold (e.g. reportable spills, contravention to air permits, etc.)
- A public complaint serious enough to warrant senior-level management involvement

The Environmental Incident form is available online through the employee password protected section of STAPLES Center's EMS website or from EMS management team. The form must be completed fully and tracked through to

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completion. Once the form has been completed, it becomes an environmental record and should be emailed to the Sustainability Programs Manager, who will track all Environmental Incident forms. The following information should be included on the form:

- Description of Incident
- Impact
- Finding, including root cause
- Date of finding
- Specific area
- Responsibility
- Corrective action
- Date closed

14.5 Related documentation

- Corrective Action Request (CAR) Form
- Environmental Incident Report Form

15.0 Control of records

The ISO 14001 Standard requires that records essential to the EMS are controlled and that the following rules are adhered to:

- Records must be easily located
- Records generated must be legible
- Records must contain a unique title and current revision date
- Records must be maintained in an orderly manner, retained for a specified period and stored to ensure that they are secure from damage, deterioration or loss.

15.1 Record retention policy

Records will be retained according to the Master List of EMS Records. The list will include:

- The record name
- Location
- Format (electronic or paper)
- Minimum retention time

15.2 Related documentation

- Master List of EMS Records

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16.0 EMS audit

16.1 The Internal Audit Program

The internal audit program is an integral part of SC and MT EMS and is a requirement of the ISO 14001 Standard. The role of the audit program is to check on the state of implementation and effectiveness of the EMS across the activities within the scope of the EMS. The Sustainability Programs Manager and the Departmental Heads will take responsibility for the internal audit program, including scheduling the audit, communication of audit results, and implementation of corrective actions.

Findings from the internal audit will be communicated to the President and the Departmental Heads at SC and MT. Findings will also be summarized at the Annual Management Review. The results will drive changes needed in the EMS, supporting the facilities' goal of continual improvement.

The Internal Audit program is designed to:

- Confirm the EMS conforms to the requirements of ISO 14001
- Check on the implementation and effectiveness of the EMS
- Review compliance with Legal and other requirements
- Identify Corrective Actions and Opportunities for Improvement

The standards that apply to the internal audit program include:

- The ISO 14001 EMS Standard
- Applicable Federal and State laws, regulations and guidelines

16.2 Use of protocols and audit frequency

Protocols for internal audits will take two forms:

- 1) ISO 14001 EMS Internal Audit Report (to be provided by internal auditor / contractor)

To focus the audit activities on priority areas, not all elements of the audit protocols need to be completed during each annual audit. The internal auditor should develop a risk-based approach to selecting audit elements for each annual audit. However, all elements of the Standard must be covered over a three year period and it must be clearly indicated in the audit report which elements have and have not been reviewed.

* The first Internal Audit prior to Registration must cover the full scope of ISO 14001.

16.3 Reporting and action plans

All identified nonconformities and non-compliances will be documented in the audit report and shared with the Sustainability Programs Manager and Departmental Heads. Action items will be treated as nonconformities under the procedures defined in section 14.

16.4 Related documentation

- SC and MT ISO 14001 Annual Internal Audit Report

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17.0 Management review

In order to maintain continual improvement, Departmental Heads must periodically conduct a review of the EMS to ensure its continuing adequacy, suitability and effectiveness. The review will address the possible need for changes to policy, objectives, targets, and other elements of the EMS.

17.1 Management review process

At a minimum, the review will cover the topics below to determine if the EMS continues to be effective, appropriate and improving from year-to-year. The annual review of the EMS must be documented.

1. Changing circumstances, including scope of operations, new programs, new aspects
2. The extent to which objectives and targets have been met
3. The Annual Performance Report including narrative on special projects and photos
4. Results of internal audits, external audits, and evaluations of legal compliance
5. Status of corrective actions and incidents
6. Communication(s) from external interested parties, including complaints
7. Follow up from previous management reviews
8. Recommendations for improvement of the EMS

17.2 Related documentation

- Record of Annual Management Review

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