



Procedure:

# INCIDENT MANAGEMENT

<b>Environmental and Social Management System Manual</b>	<b>Procedure</b>	<b>Incident Management</b>	<b>XX-doc-XX</b>
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# Incident Management Procedure

## 1. PURPOSE

The purpose of Incident Management Procedure is to:

- Establish a process to investigate work-related injuries, ill health, diseases and incidents and systematically report and respond ES incidents in a timely manner.
- Share lesson learnt to prevent and mitigate possible impacts and incidents from reoccurring.

## 2. SCOPE

Scope	Definition
Phase	Operation
Activities	<ul style="list-style-type: none"> <li>▪ Production operations and business facilities</li> <li>▪ Design and development</li> <li>▪ External providers (i.e. suppliers, service providers and contractors, key business partners)</li> <li>▪ Provision of products and services</li> <li>▪</li> </ul>
Stakeholders being impacted	Employees, communities, contractors/ contract partner

## 3. DEFINITIONS

**ES:** Environmental, Health & Safety, and Community.

**Incident:** Any unplanned events resulting in, or having a potential impacts regarding injuries, health, damages on the environment, community or other loss.

## 4. ROLES AND RESPONSIBILITIES

Responsibilities	When	Who	Tools
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin-bottom: 10px;">Incident Classification</div> <div style="text-align: center;">↓</div>	Prior to operation	Section Manager	
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin-bottom: 10px;">Incident Reporting</div> <div style="text-align: center;">↓</div>	As occurred	Person involved in incident	Incident Reporting and Investigation Form
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin-bottom: 10px;">Incident Investigation</div> <div style="text-align: center;">↓</div>	Within 72 hours after incident occurs	Plant Manager Section Manager	
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin-bottom: 10px;">Corrective Action Tracking</div> <div style="text-align: center;">↓</div>	At least every month	Section Manager	Corrective Action Request Form
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin-bottom: 10px;">Lessons Learned Sharing</div>	After investigation complete	Section Manager	

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### 5. PROCEDURES

#### 5.1. Incident Classification

5.5.1 Classify incidents into four categories: environmental, health and safety, compliance and reputational incidents. There four categories are classified into three severity levels according to Table 1 below.

Table 1: Incident Classification					
Level	Environmental	Health and Safety	Compliance	Reputational	Near-miss
<b>Level 3 (Significant)</b>	<ul style="list-style-type: none"> <li>▪ Aspect results in an uncontained or sustained environmental release, thus requiring continuous remediation.</li> <li>▪ Oil /Chemical spill above 100 Barrel result in a significant claim against the company</li> </ul>	<ul style="list-style-type: none"> <li>▪ Fatality, disability and/ or multiple lost time injuries, hospitalization (whether employee, contractor, visitor, sales person, etc.) or where multiple people are hospitalized.; or</li> <li>▪ Asset damage costing greater than 100,000 USD</li> </ul>	<ul style="list-style-type: none"> <li>▪ Loss or the suspension of operating permit; or</li> <li>▪ Fine issued by the responsible government authority.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Potential significantly impact the company's corporate image or brand (e.g., transportation incident, civil disturbance); or</li> <li>▪ Public protest; or</li> <li>▪ National/ global media attention</li> </ul>	<ul style="list-style-type: none"> <li>▪ An event or situation that could have resulted in a significant accident, injury, illness, property loss or environmental impact ("significant" is defined in #3 below) but did not, either by chance or through timely intervention.</li> </ul>
<b>Level 2 (Serious)</b>	<ul style="list-style-type: none"> <li>▪ Aspects (e.g. air emissions or wastewater discharge level) exceeds regulatory standard or condition in operating permit.</li> <li>▪ Oil /Chemical spill less than 100 Barrel</li> </ul>	<ul style="list-style-type: none"> <li>▪ Lost time injuries, restricting work ability; or</li> <li>▪ Asset damage costing between 10,000 USD to 100,000 USD.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Written warning from government authority; or</li> <li>▪ Request from government authority for EH&amp;S audit or specific sampling.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Written ES complaint; or</li> <li>▪ Local media attention</li> </ul>	
<b>Level 1 (Minor)</b>	<ul style="list-style-type: none"> <li>▪ Aspects (e.g. air emissions or wastewater discharge level) exceeds internal control standards.</li> <li>▪ Oil / Chemical Spill less than 1 Barrel</li> </ul>	<ul style="list-style-type: none"> <li>▪ First aid treatment or medical treatment required but with no lost time;</li> <li>▪ Asset damage costing less than 10,000 USD.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Unofficial warning from government authority (e.g. verbal or non-documented).</li> </ul>	<ul style="list-style-type: none"> <li>▪ Verbal or non-documented ES related complaint.</li> </ul>	

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### 5.2. Incident Reporting

5.2.1 Record and complete all information pertaining to the incident.

- Who was involved/ impacted in the incident?
- What is the level of incident (i.e. as defined in Table 1)?
- When and where did the incident occur?

5.2.2 Report all incident including near-misses to the Section Manager immediately. Employees or contractors shall notify immediate supervisor, manager or EHS officer as appropriate.

5.2.3 Verbally report “significant” incidents Group EHS within 24 hours.

5.2.4 Notify external agencies of incidents as required by regulation.

Table 2: Incident Notification				
	Notification Period	Primary Informer	Secondary Informer	Tertiary Informer
Level 3	• Within 12 hours	• Section Manager	• Group EHS	• Committee
Level 2	• Within 24 hours	• Section Manager	• Group EHS	
Level 1	• Within 72 hours	• Section Manager	-	-

### 5.3. Incident Investigation

5.3.1 Verify all incident report and provide comments prior to performing an investigation.

5.3.2 Investigate all incidents at a level of detail that is commensurate with the potential impacts.

5.3.3 Involve relevant personnel in the investigation, including the Section Manager, those whose actions may have contributed to the incident or could have prevented it, witnesses and other personnel deemed appropriate.

5.3.4 Review and approve the incident report/ completed Incident Reporting and Investigation Form.

Table 3: Investigation steps			
Investigation Steps	Level 3	Level 2	Level 1
Gather information	Required		Required
Form an investigation team	Team required		As appropriate
Develop an incident timeline	Details required		Required
Prepare an incident report	Required		Required
Determine root causes	Required		Required
Establish an action plan (corrective and preventive)	Required		Required
Review submission of incident report	Required		Required

### 5.4. Corrective Action Tracking

5.4.1 Implement the recommended actions to correct unsafe conditions/ acts and to prevent re-occurrence of the incident.

5.4.2 Monitor the progress of corrective/ preventive actions until completion.

5.4.3 Update the management of the implementation progress of corrective/ preventive actions.

5.4.4 Maintain records of all incidents and the status of the corrective/preventive actions.

### 5.5. Lesson Learnt Sharing

5.5.1 Discuss lessons learned on incidents and near-misses at meetings.

5.5.2 Communicate lesson learned to all employees and contractors through typical means such as bulletins at site, presentations at meetings, emails and intranet system as applicable.

5.5.3 Communicate key findings and completed actions across EGCO facilities for Level 3 incident.

## Incident Management Procedure

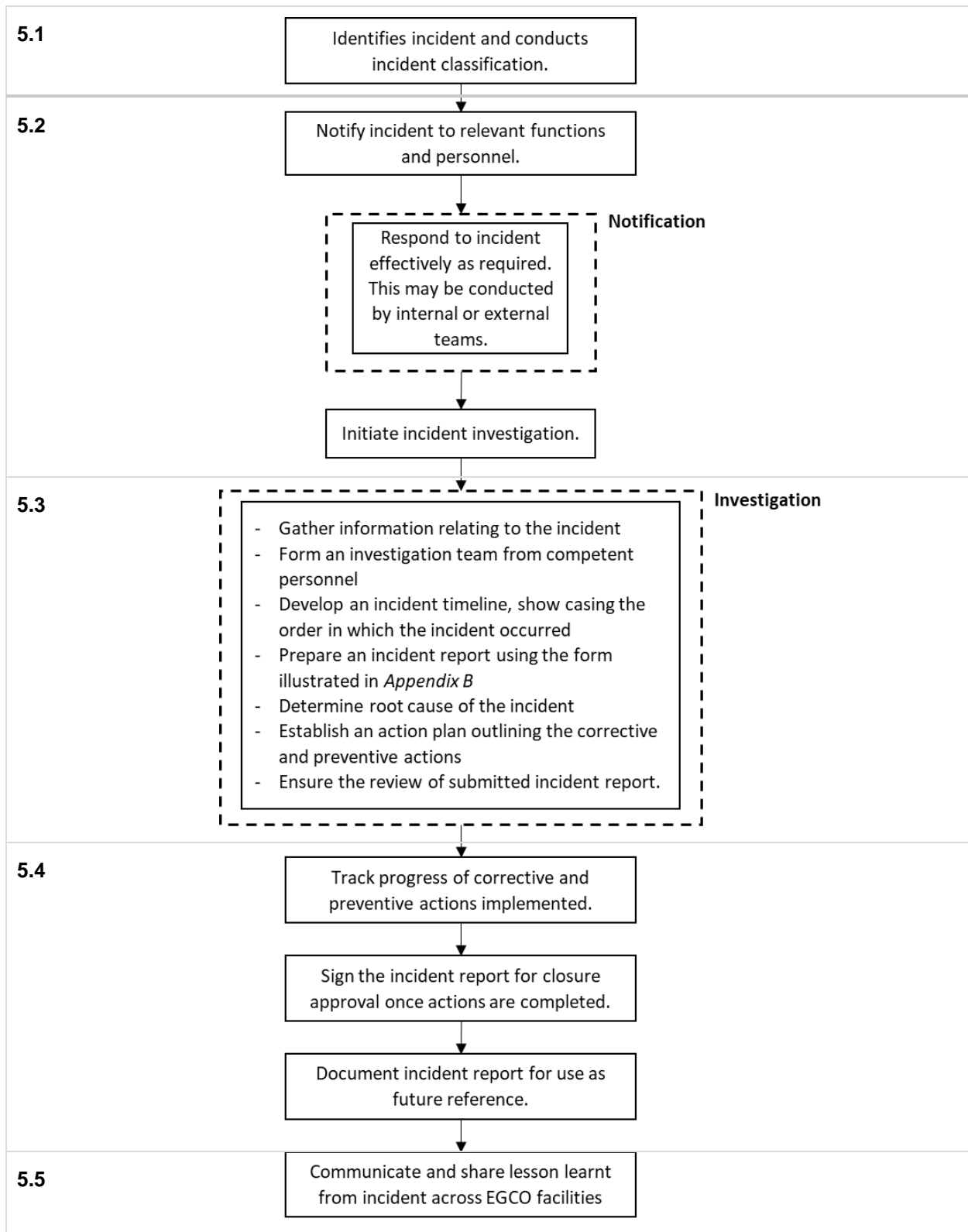
### **6. REFERENCES**

- Non-Conformity Handling Procedure
- Stakeholder Engagement Procedure

### **7. APPENDIX**



**7.1. Appendix: Simplified Work Instruction Flow Chart**



**7.2. Appendix: Incident Reporting & Investigation Form**

Incident Reporting Template			
Name of Person Affect:		<input type="checkbox"/> Employee	<input type="checkbox"/> Contractor
Description of Incident: <i>(Location, Date of Incident, Investigation Date)</i>			
Classification of Incident:			
<input type="checkbox"/> Environmental			
Impact of aspect to the environment:			
<input type="checkbox"/> Uncontained or sustained released	<input type="checkbox"/> Exceedance of regulatory standards	<input type="checkbox"/> Exceedance of internal control	<input type="checkbox"/> Other/ Details:
Aspect:			
<input type="checkbox"/> Air Quality	<input type="checkbox"/> Water Quality	<input type="checkbox"/> Noise	<input type="checkbox"/> Vibration
<input type="checkbox"/> Greenhouse gases emission	<input type="checkbox"/> Terrestrial ecosystems	<input type="checkbox"/> Aquatic ecosystems	<input type="checkbox"/> Land use change
Other/Details:			
<input type="checkbox"/> Health and Safety			
<input type="checkbox"/> Fatality	<input type="checkbox"/> Major disability _____	<input type="checkbox"/> Lost-injury time _____ days	<input type="checkbox"/> Restricting working ability
<input type="checkbox"/> First aid/ medical treatment required	<input type="checkbox"/> No work time loss	<input type="checkbox"/> Asset damaged _____ with an estimated value of _____	
Other/Details: <i>(Name, Age, Employee Number, Injured Area, Detail of Injury, Treatment Paid)</i>			
<input type="checkbox"/> Compliance issue			
<input type="checkbox"/> Lost of operating permit	<input type="checkbox"/> Suspension of operating permit	<input type="checkbox"/> Fine issued	<input type="checkbox"/> Written warning
<input type="checkbox"/> Received request from government	<input type="checkbox"/> Received a verbal warning from government		
Details of incident:			

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Details of incident:			
<input type="checkbox"/> <b>Reputational</b>			
<input type="checkbox"/> Complaint	<input type="checkbox"/> Media Attention	<input type="checkbox"/> Protest	<input type="checkbox"/> Branding
Other/Details:			
<b>Details of incident:</b>			
Details of incident:			
<input type="checkbox"/> <b>Near-miss</b>			
Details:			
<b>Details of incident:</b>			
Additional evidence attached: <i>(e.g. workbook logs, photographs, etc.)</i>			
<b>Incident Investigation</b>			
<b>A. Initial Cause</b> <i>(Unsafe operations)</i>			
<input type="checkbox"/> Operating without assigned responsibilities	<input type="checkbox"/> Absence of warning	<input type="checkbox"/> Absence of control measures	<input type="checkbox"/> Inappropriate speed used
<input type="checkbox"/> Modified machinery hence affecting usability	<input type="checkbox"/> Removed machine safety guards	<input type="checkbox"/> Inappropriate use of tools	<input type="checkbox"/> Inappropriate use transfer/ transport method
<input type="checkbox"/> Inappropriate use of PPE	<input type="checkbox"/> Inappropriate storage method	<input type="checkbox"/> Inappropriate lifting method used	<input type="checkbox"/> Inappropriate working ergonomics

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<input type="checkbox"/> Lack of precaution while working with operating machinery	<input type="checkbox"/> Use of alcohol or substances during work	<input type="checkbox"/> Lack of communication	<input type="checkbox"/> Others _____ _____
Details of unsafe operations:			
<b>B. Initial Cause (Unsafe environment)</b>			
<input type="checkbox"/> Lack of control over machinery	<input type="checkbox"/> Inappropriate use of PPE	<input type="checkbox"/> Faulty machinery used	<input type="checkbox"/> Restricting/ confined working space
<input type="checkbox"/> Absence of warning signals	<input type="checkbox"/> Hazards from fire or explosion	<input type="checkbox"/> Lack of order and tidiness in workplace	<input type="checkbox"/> Environmental hazards such as gas, dust, smoke, fumes etc.
<input type="checkbox"/> Exceedance of recommended noise level	<input type="checkbox"/> Hazard from radioactive substance	<input type="checkbox"/> Hazard from heat/ refrigerant	<input type="checkbox"/> Inappropriate illumination at workplace
<input type="checkbox"/> Lack of ventilation	<input type="checkbox"/> Others _____		
Details of unsafe working environment:			
<b>C. Root Cause (Personal Factors)</b>			
<input type="checkbox"/> Lack of knowledge	<input type="checkbox"/> Lack of competency/ technicality	<input type="checkbox"/> Tiredness/ fatigue	<input type="checkbox"/> Pressure on physical body
<input type="checkbox"/> Pressure on mentality	<input type="checkbox"/> Lack of motivation	<input type="checkbox"/> Others _____	
Details of root cause:			
<b>D. Root Cause (Work-related Factors)</b>			
<input type="checkbox"/> Lack of leadership	<input type="checkbox"/> Lack of efficient design	<input type="checkbox"/> Lack of appropriate procurement	<input type="checkbox"/> Lack of maintenance
<input type="checkbox"/> Lack of tools, materials and equipment	<input type="checkbox"/> Lack of working standard	<input type="checkbox"/> Use of faulty equipment	<input type="checkbox"/> Others _____ _____

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Details of root cause:			
<b>E. Corrective Action</b>			
No.	Corrective/ Preventive Action	Responsible Person	Date
Investigator Signage:			
1 _____	2 _____	3 _____	4 _____
(.....)	(.....)	(.....)	(.....)
Position:	Position:	Position:	Position:
Date:	Date:	Date:	Date:
Approval Closure Signage:			
1 _____	2 _____	3 _____	4 _____
(.....)	(.....)	(.....)	(.....)
Position:	Position:	Position:	Position:
Date:	Date:	Date:	Date:

## Guidance

### Gather information:

- Assign responsible person to gather information whereby the responsible person shall:
  - Do not initiate any investigation until medical treatment has been given to impacted personnel or the abnormal situation is under control.
  - Once the incident is secured and/ or under controlled, the impacted area should be roped and taped off to avoid irrelevant person from entering.

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- Interview and collaborate with witnesses or persons involved in the incident in order to gather related observations and information. Sources of information may include interviews, review of record and footage, analysis of the area/ machineries and samples, etc.
- Capture photographs of the incident area to document in incident report.

### *Form an investigation team:*

- Form an investigation team based on the incident classification and severity of the incident. The size of the team is not fixed as it is dependent on the complexity of each incident. However, it should be ensured that personnel selected to form the team:
  - Adds value to the investigation process;
  - Competent and knowledgeable in the area of the incident (e.g. a specialists or subject matter expert); and
  - Able to identify and determine root causes.

### *Develop an incident timeline:*

- Establish an incident timeline (in chronological sequence). Depending on the level of incident, details included in the sequence time. It should be ensured that the incident timeline:
  - Begins with the point where operations were at a normal state;
  - Covers all knowledge and event occurring during the incident. Information can be compiled from the “Gather Information” stage.

### *Prepare incident report:*

- Prepare the incident report. Information required in the report includes, but not limited to:
  - General information regarding the incident (date, time, location, classification of incident, name of witness/ person involved, immediate response taken).
  - Name of applicable regulation or permit violated.
  - Specific explanation regarding the incident.
  - Initial response conducted.
  - Supporting information (e.g. incident timeline and photos).
- Ensure responsible person is assigned to be accountable for confirming the completion and accuracy of incident record.

### *Determine root cause:*

- Adopt investigation tools and methods, such as, 5-Why's, Fault Tree Analysis or Fishbone diagram to determine the underlying or systematic causes of the incident. Examples of consideration point includes, but not limited to:
  - Failure in defence system;
  - Personnel involved in the occurrence of incident (e.g. operators or maintenance personnel);
  - Influential factors which may have affected the performance of personnel, equipment and/ or system (e.g. fatigue, pressure, miscommunication, weathering, gas or chemicals, procedure and management systems etc.);

### *Establish an action plan:*

- Identify corrective and preventive actions to address and prevent reoccurrence of the identified causes. Information from the root cause determination process should be used as source of input.
- Ensure that actions recommended are **SMART** recommendations such that it is specific, measurable, accountable, relevant and has an assigned timeframe.

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### *Review incident report and completion of actions:*

- Review the completeness of the incident report. This should be conducted by the EH&S officer.
- Submit the reviewed incident report to EH&S Site leader, Regional EH&S and Group EH&S respectively for acknowledgement.
- Document incident report in a system such that the report can easily be found and used as reference when required.