

## 1. Purpose

The purpose of this procedure is to ensure that a thorough incident investigation is performed and reported in a timely manner to implement corrective and/or preventive measures for the safety and health of personnel at [REDACTED] [REDACTED]).

## 2. Scope

This procedure applies to near misses, accidents, and illnesses that occur at [REDACTED] involving [REDACTED] employees, temporary personnel, visitors, and/or contractors.

### 3. References

### 3.1. Glossary of Terms/Acronyms

[REDACTED]

#### 4. Responsibilities

- 4.1. Employees are responsible for immediately notifying management when involved in an incident or have witnessed an incident.
- 4.2. Of special importance is the responsibility of Supervisors and Managers, who are expected to actively participate in investigations. They are close to the jobs, conditions, and employees and know the details of the jobs such as procedures, hazards, environmental conditions, and unusual circumstances. They know their employees, their job experience, and personal characteristics. In addition, actively participating in the investigation of incidents increases the Supervisor/Manager's sense of responsibility and involvement in incident prevention.
- 4.3. The Environmental, Health & Safety (EHS) Representative is responsible for providing support to the supervisor/manager during investigations. They are to ensure the incident investigation report(s) has/have been filled out accurately, signed off, and sent to the appropriate personnel.
- 4.4. Human Resources is responsible for coordinating drug and alcohol screening consistent with the [REDACTED] Drug Free Workplace Policy.

## 5. Procedure

### 5.1. Reporting an Incident

- 5.1.1. Employees are responsible for immediately notifying their Supervisor, Manager, or Production Management, or designee, when involved in an incident or have witnessed an incident.
  - 5.1.1.1. An incident is any unplanned, undesired event that may cause adverse effects and can be classified as a near miss or an accident.
    - 5.1.1.1.1. A near miss is an event with the potential to cause, or could have caused, an injury, spill or release to the environment, or property damage.
    - 5.1.1.1.2. An accident is any undesired, unplanned event that results in physical injury, spill or release to the environment, or property damage.
- 5.1.2. Once notified, the Supervisor or Management will distribute the incident reports as appropriate. The EHS Representative and Human Resources must also be informed immediately, via email, with a brief description of the incident and if the personnel involved are going to a medical facility.

- 5.1.2.1. The personnel involved in an incident shall fill out [REDACTED] Report.
- 5.1.2.2. If there are witnesses, [REDACTED] Statement shall be completed by each individual that witnessed the incident (i.e., if 5 individuals witnessed the incident, there will be 5 total Witness Statement Reports on record).
- 5.1.2.3. Near Miss incidents shall be documented on [REDACTED] Report.
- 5.1.2.4. The Supervisor or Management shall complete [REDACTED] Report.
- 5.1.3. These reports shall be filled out completely, with the Supervisor or Management interviewing the involved personnel to gather the facts leading up to and including the incident. See Appendix I for reporting timelines. Completed reports shall be given to the EHS Representative for final review and follow-ups on corrective/preventive action implementation.
- 5.2. Investigating an Incident
  - 5.2.1. Incident investigation is the responsibility of all levels of management. Those who may be actively involved in the incident investigation process include Supervisors, Managers, EHS Representative, Quality, etc. The investigation of any safety-related incident must include at least one person knowledgeable in the process involved.
  - 5.2.2. The following incidents shall be investigated:
    - 5.2.2.1. Near Miss Incidents
    - 5.2.2.2. First Aid Injuries
      - 5.2.2.2.1. First Aid is any one-time treatment and any follow-up visit for the purpose of observation of any minor scratches, cuts, burns, splinters, etc., which do not ordinarily require medical attention. Such one-time treatment and follow-up for the purpose of observation is considered first aid even though provided by a physician or other medical professional.
      - 5.2.2.2.2. At a minimum, documentation shall be kept for minor first aid incidents such as papercuts
    - 5.2.2.3. Injuries beyond First Aid (OSHA Recordable) including fatalities
    - 5.2.2.4. Damage to any Onsite Property or Equipment
    - 5.2.2.5. Catastrophic Events such as fire, explosion, workplace violence
    - 5.2.2.6. Spills/Releases involving a Hazardous Substance which may or may not adversely affect the environment
    - 5.2.2.7. Security Incidents such as theft, threats, suspicious activity, facility breaches
  - 5.2.3. Incident investigations must be conducted immediately. When injuries are involved, the investigation may need to occur after medical assistance has been provided and the employee has been transported to a medical facility. However, if an investigation can be started without delaying or hampering medical assistance, then it should begin immediately.
    - 5.2.3.1. If an employee is transported to a medical facility, the Supervisor/Manager shall accompany them and ensure drug testing is performed.
  - 5.2.4. A complete investigation includes the objective evaluation of the facts, opinions, statements, and related information along with the formulation of an action plan to prevent or control recurrence. The accuracy and thoroughness with which data is obtained and recorded will determine the quality of the final report and the effectiveness of corrective/preventive actions.
  - 5.2.5. When investigating an incident, the follow steps shall be taken into consideration:
    - 5.2.5.1. Never rush into an investigation scene as this can cause further injury.
    - 5.2.5.2. Make sure any injured individuals are taken care of and the scene has been secured. If the injury is minor, the injured individual may be questioned while being treated.
    - 5.2.5.3. Assist Emergency Response Personnel as directed, if applicable.
    - 5.2.5.4. When investigating a fatality, cover the body but do not move it. Rope or tape off the immediate area until medical personnel arrive.
    - 5.2.5.5. Witnesses should be located and written statements taken. Witnesses must never be interviewed together and should be instructed to refrain from discussing the accident with others until such time as the investigator can take a written statement.
    - 5.2.5.6. The investigation scene should be inspected and photographed, if possible, from all angles.

Notes should reflect only the facts that were brought out in the investigation and from statements by witnesses. This is not the time to speculate or form opinions of the accident that are not based on fact.

5.2.5.6.1. Photographs taken are proprietary to [REDACTED] and will be treated as such.

5.2.5.7. An investigator must not assign blame to anyone. Prematurely assigning blame or cause during an investigation would be counterproductive to the investigation process.

5.2.6. Information and statements shall be documented on the Supervisor/Manager Incident Investigation Report. If any evidence is to be taken from the incident scene, it should be labeled/tagged and, when possible, photographed. When equipment or machinery is involved in an incident, it is important to note the exact name, make, model, serial number, any apparent modification or alterations, and how and under what conditions the equipment was being used.

5.2.7. Completed reports shall be given to the EHS Representative to maintain, with a copy sent to Senior Management, Human Resources, and Operations Management.

### 5.3. Incidents Involving Temporary Personnel, Contractors and Visitors

5.3.1. Incidents involving temporary personnel or visitors in any [REDACTED] facility shall be reported/investigated following the same process as incidents involving [REDACTED] employees.

5.3.2. For incidents involving a contractor, the EHS Representative shall notify the contractor's supervisor and provide the appropriate incident paperwork.

### 5.4. Corrective and Preventive Actions

5.4.1. The prevention of recurring situations that negatively impact safety in the workplace requires corrective action such as retraining, instruction in safe work practices, comprehensive hazard recognition and avoidance efforts, elimination of unsafe conditions, and disciplinary actions, if needed.

5.4.2. Corrective and preventive actions for any incident shall be objective and address the root cause(s) and contributing factors that led to the incident. Actions shall be replicated throughout the facility and shared with other locations to mitigate the potential for the same incident in those other locations.

### 5.5. Training

5.5.1. Any person assigned the responsibility of incident investigation must be adequately trained to do so.

5.5.2. The investigator must be able to carry out the investigation in an objective and impartial manner.

5.5.3. Supervisors and facility key leaders shall participate in incident investigation training at least annually.

5.5.4. The training shall indicate the name of the employee and the date of the training.

## 6. OSHA Recordable Incidents

6.1. In addition to logging injuries and illnesses for tracking and trending purposes, Human Resources shall document OSHA Recordable Injuries and Illnesses on the OSHA Form 300 and 301. An OSHA Recordable Incident is any occupational injury or illness which concludes in a:

6.1.1. Fatality, regardless of the time between the injury and death or length of the illness.

6.1.2. Lost Workday Case (other than a fatality) that results in days away from work.

6.1.3. Restricted Activity Case (no days away from work) that results in the transfer to another job or the restriction of work or motion (normal work duties).

6.1.4. Medical Treatment Only Case (nonfatal case without lost workdays or restricted activity) that requires professional medical treatment (other than first aid) or involves loss of consciousness. This category also includes any diagnosed occupational illness which is not classified as a fatality, lost workday, or restricted activity case.

6.2. Recordable incidents shall be added to the forms within seven (7) days of learning about the incident.

6.3. Recordable Injuries and illness are provided to OSHA on an annual basis on the OSHA Form 300A, signed by a Corporate Officer, with a copy of the complete OSHA Form 300A posted conspicuously from February through April.

## 7. OSHA Reportable Incidents

7.1. In addition to recording occupational injuries and illness per the requirements in Section 6, OSHA also

requires the following incidents to be reported when they occur:

- 7.1.1. Fatality within eight (8) hours of finding out about the fatality. Fatalities only need to be reported if they occur within 30 days of a work-related incident.
- 7.1.2. Inpatient Hospitalization for care or treatment, not diagnostic testing or observation, within twenty-four (24) hours of learning about the inpatient hospitalization. Inpatient Hospitalizations only need to be reported if they occur within 24 hours of a work-related incident.
- 7.1.3. Amputation within twenty-four (24) hours of learning about the amputation. Amputations only need to be reported if they occur within 24 hours of a work-related incident.
- 7.1.4. Loss of an eye within twenty-four (24) hours of learning about the loss of an eye. Loss of eye incidents only need to be reported if they occur within 24 hours of a work-related incident.
- 7.2. The above incidents can be reported in the following ways:
  - 7.2.1. By telephone to the nearest OSHA Area Office during normal business hours  
[REDACTED]
  - 7.2.2. By telephone to the 24-Hour OSHA Hotline at 1-800-321-OSHA (6742)
  - 7.2.3. Electronically at [www.osha.gov](http://www.osha.gov) ([REDACTED])
- 7.3. Senior Management, Safety Management, and Human Resources must be provided with the following information immediately, which shall then be provided to OSHA at the time of reporting an incident:
  - 7.3.1. Establishment Name
  - 7.3.2. Number and name(s) of the employee(s) affected
  - 7.3.3. Location and time of the incident
  - 7.3.4. Brief description of the incident, including the outcome (i.e., fatality, loss of eye, amputation, inpatient hospitalization)
  - 7.3.5. Name and phone number of a contact person
    - 7.3.5.1. Provide HR information
- 7.4. Human Resources is responsible for reporting these incidents within the required timeframes.

## 8. Record Retention

- 8.1. Quality Management System (QMS) documents shall be maintained according to current procedure [REDACTED]
- 8.2. Investigation documents/files shall be maintained by Safety Management for a minimum of five (5) years.
- 8.3. Records of workplace injury/illness (i.e., OSHA logs) shall be maintained by Human Resources in perpetuity.

## Appendix I. Reporting Timelines

Situation	Who	What	When
Near Miss Incident	Employee Involved and Witness(es)	Reports Near Miss	Immediately; within one (1) hour of occurrence
		Completes Near Miss Report	Immediately upon reporting
		Turns in Near Miss Report to Supervisor	
	Supervisor or Management	Completes Supervisor/Manager Incident Investigation Report	Within two (2) business days of notification
		Turns in reports to EHS Representative	
	EHS Representative	Reviews paperwork and initiates follow-up or corrective action as needed	After receipt of report(s)
Injury Incident	Employee Involved	Reports Injury	Immediately; within one (1) hour of occurrence
		Completes Employee Incident Report, if able	Immediately upon reporting
		Turns in report to Supervisor	
	Witness(es)	Completes Witness Statement Report	Same day as injury
		Turns in Witness Statement Report to Supervisor	
	Supervisor or Management	Completes Supervisor/Manager Incident Investigation Report	Within two (2) business days of notification
		If Employee needs to go to the clinic or hospital, contact Human Resources for initiation of Worker's Compensation Claim <i>Note: if incident involves a hazardous chemical, a copy of the SDS must be provided to the clinic/hospital</i> <i>Note: if employee refuses to get medical care, document the refusal on the Supervisor/Manager Incident Investigation Report</i>	
		Turns in paperwork to EHS Representative	
	EHS Representative	Reviews paperwork and initiates follow-up or corrective action as needed	After receipt of report(s)
Spill/Release Incident	Employee Discovering Spill	Reports Spill	Immediately
	Spill Team Leader	Completes the Spill Release portion of the Supervisor/Manager Incident Investigation Report	Immediately after the spill is cleaned up
		Turns in Supervisor/Manager Incident Investigation Report to Supervisor	
	Supervisor or Management	Completes the bottom portion of the Supervisor/Manager Incident Investigation Report	Within two (2) business days of notification
		Turns in paperwork to EHS Representative	
	EHS Representative	Reviews paperwork and initiates follow-up or corrective action as needed	After receipt of report(s)
Property Damage Incident	Employee Involved	Reports Incident	Immediately; within one (1) hour of occurrence
		Completes Employee Incident Report	Immediately upon reporting

		Turns in report to Supervisor	
	Witness(es)	Completes Witness Statement Report	Same day as incident
		Turns in Witness Statement Report to Supervisor	
	Supervisor or Management	Completes Supervisor/Manager Incident Investigation Report	Within two (2) business days of notification
		Turns in paperwork to EHS Representative	
	EHS Representative	Reviews paperwork and initiates follow-up or corrective action as needed	After receipt of report(s)
Catastrophic and Security Incident	Employee Involved	Reports Incident	Immediately; within one (1) hour of occurrence
		Completes Employee Incident Report	Immediately upon reporting
		Turns in report to Supervisor	
	Witness(es)	Completes Witness Statement Report	Same day as incident
		Turns in Witness Statement Report to Supervisor	
	Supervisor or Management	Completes Supervisor/Manager Incident Investigation Report	Within two (2) business days of notification
		<i>Note: if incident involves a hazardous chemical, a copy of the SDS must be provided to the clinic/hospital</i>	
		<i>Note: If employee needs to go to the clinic or hospital, contact Human Resources for initiation of Worker's Compensation Claim</i>	
	EHS Representative	Reviews paperwork and initiates follow-up or corrective action as needed	After receipt of report(s)

### REVISION HISTORY

REVISION	SUMMARY OF CHANGES INCORPORATED	DATE
Original	N/A	See Below

### APPROVAL

	SIGNATURE	TITLE	DATE
PROCESS OWNER:			
REVIEWER:			
APPROVER:			