

My Company Incident Reporting and Investigation Policy

Management Statement: My Company realizes the importance of accurate and timely reporting of incidents and injuries. My Company Management understands that unless incidents and injuries are reported, we will lose the opportunity to learn and improve our Health, Safety and Environmental program. My Company strives to foster an atmosphere of management and personal accountability relative to reporting and investigating incidents and injuries. Our motto is: "You will never get into trouble for reporting event, but not reporting an HSE event as described below is breaking company policy and will lead to disciplinary action". All incidents occurring on a My Company worksite, no matter how small, must be reported.

Definitions:

- **A Health or Safety Event** is any event which has or may lead to:
 - Harm to one or more persons including:
 - Near miss or near hit: Level 1
 - First Aid Injury as described in OSHA 300: Level 2
 - OSHA Recordable Injury :Level 3
 - Days Away From Work Case: Level 4
 - Hospitalization of one employee: Level 4
 - Fatality: Level 4
- Note: Hospitalization of two or more employees overnight or one or more fatalities must be reported to OSHA within 24 hours.
- **Vehicle Event** is any event which has or may lead to:
 - Near Miss or near hit: Level 1
 - Damage to a vehicle, < \$500.00: Level 2
 - Damage to a vehicle, > \$500.00: Level 3
- **Environmental Event** is any event which has or may lead to:
 - Minor release of chemical fluids or hydrocarbons, <2 liters: Level 2
 - Damage to an environmental containment, < \$1000.00: Level 2
 - Environmental damage: Level 3
 - 2 liters – 10 liters of chemical, fluids or hydrocarbons
 - \$1000.00 - \$5000.00 damage to an environmental containment
 - Major Environmental Damage: Level 4 Any environmental event > those listed as Level 3

Reporting Responsibilities:

- All My Company Employees, Contractors and Sub-Contractors shall Report any event listed above as soon as safely possible, but always within one hour of the event. My Company Clients Shall be notified immediately of any incidents occurring on their property or in their operations.

Investigation of Incidents:

- Incidents listed as Level 1 or Level 2 will be investigated at the discretion of the local management and My Company HSE staff.
- Incidents listed as Level 3 or above will be investigated by a team of HSE, supervision and management, and led by a trained My Company Root Cause Analysis Specialist. A Root Cause Analysis will be performed to better understand the incident and avoid reoccurrence
- Incidents listed as Level 4 will be investigated in coordination with My Company President or the President's Delegate, and will be led by a trained My Company Root Cause Analysis Specialist. A Root Cause Analysis will be performed to better understand the incident and avoid reoccurrence
- Information gathered in any investigation will be summarized and shared throughout My Company to avoid a repeat of the incident.

Signed: My Company President

Date: 1/1/06

Co-Signed: My Company VP of HSE

Date: 1/1/06

Revised: _____