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INCIDENT INVESTIGATION AND REPORTING POLICY NYRSTAR CLARKSVILLE INC Document number TP - 563-00012 Department Safety & Health

R- Indicates Revisions

1. Purpose

R- The purpose of this Policy is to ensure the proper investigation and reporting of incidents, including the determination of root causes, corrective actions, and trends, so that the recurrence of a similar event can be avoided.

2. Scope

This policy applies to all employees and contractors working at Nyrstar Clarksville.

3. References & Responsibility

References: Nyrstar Group Standard GS103

Responsibility:

Individuals: It is the responsibility of all employees and contractors to report all incidents and industrial injuries immediately to their Team Leader, or Contract Administrator.

Leaders: The Department or Area Superintendent is responsible for assigning the investigation for all incidents. Typically, the Team Leader or Contractor Administrator will initiate the RIMS report. The Safety Department will assist the Department personnel involved.

The Plant Nurse has the responsibility to maintain all information pertaining to the description of injuries and disposition of the case, in accordance with the established Work Injury Program. (Safety Policy TP-563-00029)

All notifiable Safety and Health Incidents need to be reported within 48 hours to the Corporate Health and Safety Manager in accordance with section 4.7.1 of the Nyrstar Group Standard (GS103).

The Safety Department will determine all conditions or trends, in conjunction with other incident investigation reports.

4. Procedure

4.1. Reporting

All incidents that result in an injury to plant personnel or property damage must be reported to the Team Leader immediately.

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R - For Non-emergency situations, immediate assistance for the injured party will be provided by the Plant Nurse. On off shifts, such as nights and weekends, also contact the Plant Nurse for guidance. If the Plant Nurse is unavailable, another representative from the Safety Department must be notified of the injury event (use SHEQ contact list), if the injured medical needs are beyond basic first-aid treatment.

For emergency situations, the Team Leader will contact emergency medical services by dialing 911 from a cell phone or 9-911 from any plant phone. Security is available to assist with contacting emergency medical services as well. Next, contact the Plant Nurse or a member of the Safety Department and the Superintendent.

The Team Leader is responsible for notifying the Superintendent if the injured employee will receive immediate outside medical treatment. The Safety Department is responsible for notifying the Superintendent if the status of the injured employee changes, and he or she needs outside medical treatment at a later time (i.e., went home, but seeks treatment later in the day/night).

R- Once the injured person's medical needs have been addressed and the area where the incident has occurred has been deemed safe to re-enter, the Team Leader will preserve the scene and begin to collect data that will aid in the investigation process.

4.2. Starting an Investigation (All Incidents)

R- The Team Leader or Contract Administrator will conduct an investigation of the circumstances and record them into a RIMS report. The level and type of investigation required is determined by the actual and/or potential consequence rating of the incident as described in Nyrstar Group Standard GS 103

4.3. Sign-off (All Incidents)

All incidents will be fully investigated with identification of root causes and assignment of corrective actions within 14 days, at which time sign-off will occur by the incident owner.

5. Recordable Injury / Compensable Incident Investigation

5.1. Objective

A formal, carefully documented investigation will be conducted in a timely fashion for all recordable injuries and compensable incidents to provide a written report of the incident, so that all plant personnel will know the cause of an incident, and take precautions to prevent the same type of incident from occurring in other locations.

5.2. R- Responsibility

The General Manager, or his designate, will select a suitably qualified Lead Investigator who will lead the Investigation Team.

The Lead Investigator selects the investigation team, which can consist of the following personnel:

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- Department Superintendent
- Team Leader
- Asset Management Representative
- Hourly Employee
- Representative from the Safety Department

The Lead Investigator is responsible for scheduling team meetings and ensuring that all notes and written reports are completed and documented in the Risk Information Management System (RIMS). The Lead Investigator will review all findings and any corrective actions resulting from the investigation with the Department Superintendent and the site Management Team.

The Department or Area Superintendent where the incident occurred is responsible for ensuring that all actions resulting from the Investigation are implemented and reviewed for sustainability.

5.3. R- Procedure

The investigation shall be done as soon as possible.

Information will be gathered as soon as possible; examples of information could include the following;

- Photos of the area where the incident/injury occurred
- Photos of the employee's injury (<u>if possible & with employee's consent</u>)
- Witness statements

The Investigation will be completed within 14 days of the incident. Exceptions to this timing may be granted by the General Manager. The Final Report will be generated and distributed when the investigation is completed.

The Lead Investigator shall present the results of the investigation to the General Manager and Management Team.

6. Records and Documentation

All records and documentation will be stored in the RIMS system.

7. Audit and Review

R- Compliance with this policy and GS 103 will be verified during the Corporate Safety and Health Audit. Any changes to this policy will be reviewed by the SHEQ Manager.

8. Accountabilities

'The SHEQ Manager is accountable for this Policy.

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