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Brunel Energy, Inc.

Incident Investigation and Reporting

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1. Purpose

- 1.1. Brunel Energy, Inc., hereinafter referred to as, the “Company,” has established a program compliant with OSHA to have effective procedures for reporting and investigating incidents and non-conformances in order to prevent further occurrences.

2. Applicability

- 2.1. This policy applies to employees, subcontractors and/or visitor(s) of the Company. For the purposes of this policy, an employee shall be considered on the job whenever he/she is:
 - 2.1.1. On or in, any Company or client property, including parking areas; or
 - 2.1.2. On Company time even if off Company premises (including paid lunch, rest periods and periods of being on call).
- 2.2. As a condition of employment, Company employees are required to abide by additional governmental or customer policies and requirements that may be imposed at a worksite in addition to the requirements of these policies and procedures. Nothing set forth in this policy constitutes, construes, or interprets in any way as a contract of employment.

3. Definitions

- 3.1. **An accident** is defined as an unplanned event that results in personal injury or property damage.
- 3.2. **Incident** is defined as an unplanned event that does not result in personal injury but may result in property damage or is worthy of recording.
- 3.3. **Incident Investigation** is the accounting and analysis of an incident based on information gathered by a thorough examination of all contributing factors and causes involved.
- 3.4. **Root Cause Analysis** allows an employer to discover the underlying or systemic, rather than the generalized or immediate, causes of an incident.
- 3.5. **Safety non-conformance** is the result after doing an audit against safety standards like OSHA.

4. Responsibilities

- 4.1. Manager(s) shall:
 - 4.1.1. Assign individual responsibilities for incident investigation prior to occurrence of an incident.
 - 4.1.2. Assign individual responsibilities for reporting and investigation must be pre-determined and assigned prior to incidents.
 - 4.1.3. Ensure investigations are conducted and assist in identifying corrective actions.
 - 4.1.4. Act as the Company Safety Manager if one has not been appointed.

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4.2. HSE Supervisor(s) shall:

- 4.2.1. Investigate (or assists in) incident investigations.
- 4.2.2. Correct non-conformances.
- 4.2.3. Accompany injured employees to the medical provider for initial treatment.

4.3. Employee(s) shall:

- 4.3.1. Immediately report any injury, job related illness, spill, or damage to any property to their immediate supervisor. If their immediate supervisor is not available, the employee is then to immediately notify the manager.
- 4.3.2. Employees who are designated to act as first responders will be trained and qualified in first aid techniques to control the degree of loss during the immediate post-incident phase.

4.4. Subcontractor shall:

- 4.4.1. Immediately report any injury, job related illness, spill, or damage to any property to their Company point of contact.

5. Procedure

5.1. Investigations of Incidents & Non-conformances

- 5.1.1. Investigation is an important part of an effective safety program in that it determines the root cause and corrective actions necessary to prevent similar incidents or non-conformances. All incidents will be investigated to the appropriate level with regards to incident severity.
- 5.1.2. After immediate rescue or response, actions to prevent further loss will occur if the scene is safe. For example, maintenance personnel should be summoned to assess integrity of buildings and equipment, engineering personnel to evaluate the need for bracing of structures, and special equipment/response requirements such as safe rendering of hazardous materials or explosives employed.
- 5.1.3. The following must be reported to the employee's supervisor immediately. If that person is not available, then the company's Safety Manager shall be immediately notified for:
 - 5.1.3.1. Near miss incidents with the potential to harm people, the environment, or assets.
 - 5.1.3.2. Work related injuries or illnesses; Property damage including vehicle incidents.
 - 5.1.3.3. Hazardous chemical spillage, loss of containment and contamination.
 - 5.1.3.4. Non-conformance to safety or environmental rules, policies, or standards.
- 5.1.4. The supervisor shall make the necessary notifications and begin the incident investigation process including but not limited to the following.

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- 5.1.5. In the case of a major injury or incident the scene of the event should be closed off and kept "as is" at the time of the incident. This is vital for effective incident investigation.
 - 5.1.6. Incident investigation occurs as soon as possible, while the facts are still fresh within the minds of those involved (i.e., witnesses). Take the opportunity to talk to all of those involved before they become unavailable or memory fades. An incident investigation must be thorough and concerned only with cause and prevention and must be separate from administrative disciplinary action.
 - 5.1.7. All incidents shall be investigated, and the investigation conducted in a timely fashion and the Incident/Accident Report shall be completed with factual and meaningful information. This process shall also include the distribution of the Safety Alert Bulletin / Lesson Learned throughout the entire organization within four days of completing the investigation.
 - 5.1.8. Individual responsibilities for reporting and investigation shall be pre-determined and assigned prior to incidents occurring.
 - 5.1.9. All witnesses shall complete and sign the Statement of Witness to Accident/Incident form in the presence of a supervisor who shall also sign the form.
 - 5.1.10. An Incident Potential Matrix Value shall be assigned to the incident and noted in the report.
 - 5.1.11. Initial identification of evidence immediately following the incident shall include a listing of people, equipment and materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, and physical factors such as fatigue, age, and medical requirements.
 - 5.1.12. Evidence such as people, positions of equipment, parts and papers shall be preserved, secured, and collected through notes, photographs, witness statements, flagging and impoundment of documents and equipment.
 - 5.1.13. Incident investigations shall result in corrective actions.
 - 5.1.14. Written incident reports shall be prepared and include an accident/incident report form and a detailed account of the events.
 - 5.1.15. The worksite supervisor (Field Supervisor or HSE Manager) as appropriate, is responsible for ensuring timely, accurate and complete incident reports are forwarded to rig or country management.
 - 5.1.16. The worksite supervisor (Field Supervisor or HSE Manager) shall forward all incident reports to the appropriate management within a four-hour time period.
- 5.2. Equipment
- 5.2.1. Proper equipment will be available to assist in conducting an investigation. Equipment may include some or all of the following items: writing equipment such as pens/paper, measurement equipment such as tape measures and rulers, cameras, small tools, audio

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recorder, PPE, flags, equipment manuals, etc. The Safety Manager shall have an incident investigation kit prepared in advance.

5.3. Incident Reporting Matrix

5.3.1. The Incident Reporting Matrix identifies, based on type of incident, who within corporate management shall be verbally notified and when. It also specifies which type of report from the field shall be completed based on the type of incident.

5.3.2. Reporting of the incident must occur in a specified manner based on site specific requirements and the reporting sequence shall be posted.

5.4. Time Elements for OSHA and Client Notification

5.4.1. Required incidents must be verbally reported to OSHA within 8 hours of their discovery. Incidents must also be reported to the owner client as soon as possible or in a timely manner (within 24 hours of incident).

EXTERNAL INCIDENT NOTIFICATION MATRIX

TYPE OF INCIDENT	WHO TO NOTIFY VERBALLY	WHEN	INCIDENT REPORT FORM
Minor First Aid	Owner Client	24 hrs	Yes
Injury Above Minor First Aid	911 / Site Medical Response / Owner Client	ASAP	Yes
As Required Injury Reporting	OSHA / Owner Client	Within 8 hrs	Yes
Fire / Explosion	911 / Site Fire Response / Owner Client	ASAP	Yes
Reportable Spill	Site Environmental / Owner Client	Within 24 hrs	Yes
Property/Vehicle Damage	Owner Client	Within 24 hrs	Yes

INTERNAL INCIDENT NOTIFICATION MATRIX

TYPE OF INCIDENT	WHO TO NOTIFY VERBALLY	WHEN	INCIDENT REPORT FORM
Minor First Aid	Safety Manager	ASAP	Yes
Injury Above Minor First Aid	Safety Manager	ASAP	Yes
As Required Injury Reporting	President then Safety Manager	ASAP	Yes
Fire / Explosion	Safety Manager	ASAP	Yes
Reportable Spill	Safety Manager	ASAP	Yes
Property/Vehicle Damage	Safety Manager	ASAP	ASAP

5.5. Incident Review Team and Incident Investigation Report

5.5.1. All incidents will be investigated to the appropriate level with regards to incident severity. While all incidents should be investigated, the extent of such investigation shall reflect the seriousness of the incident utilizing a root cause analysis process or other similar method determined by the company's Safety Manager. They will form an Incident Review Team that participates in the determination of the final root- cause

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investigative incident report. The team consists of representatives of management or other designees as assigned by the company's Safety Manager.

5.6. Initial Identification/Assessment of Evidence

5.6.1. Initial identification of evidence immediately following the incident could include a listing of people, equipment, and materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, etc., equipment manuals industry guidance documents, Company policies and records schedules, records and training records audit and follow up reports, enforcement policies and records previous corrective action recommendations.

5.7. Collection/Preservation and Security of Evidence

5.7.1. Evidence such as people, positions of equipment, parts, and papers must be preserved, secured, and collected through notes, photographs, witness statements, flagging, and impoundment of documents and equipment. All shall be dated.

5.8. Witness Interviews and Statements

5.8.1. Witness interviews and statements must be collected. Locating witnesses, ensuring unbiased testimony, obtaining appropriate interview locations, and use of trained interviewers should be detailed. The need for follow-up interviews should also be addressed. All items shall be dated.

5.9. Final Incident Report

5.9.1. The final incident investigation report consists of findings with critical factors, evidence, corrective actions, responsible parties, and timelines for corrective action completion.

5.9.2. Incident investigation must be documented. Participants shall prepare a written report including the description of the incident, any evidence collected during the investigation, an explanation of the causes of the incident and corrective actions.

5.9.3. Results of incident investigations are communicated to employees via the Incident Notice form.

5.10. Preparation of the Written Incident Report

5.10.1. Written incident reports will be prepared and include the Field Incident Report Form and a detailed narrative statement concerning the events. The format of the narrative report may include an introduction, methodology, summary of the incident, Incident Review Team member names, narrative of the event, findings, and recommendations. Photographs, witness statements, drawings, etc. should be included.

5.10.2. The supervisor completes the Company's Field Incident Report and takes the below steps when beginning an incident investigation.

5.10.3. Provide emergency assistance, as needed, and qualified for.

5.10.4. Secure the area as quickly as possible to retain the area in the same condition at the time of the incident.

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5.10.5. Notify management by phone according to the Incident Notification Matrix.

5.11. Identify Potential Witnesses

5.11.1. Use investigation tools, as needed (camera, drawings, video, etc.)

5.11.2. Tag out for evidence any equipment that was involved.

5.11.3. Interview witnesses (including the effected employee) and obtain written, signed statements and fax to the Company's Safety Manager.

5.11.4. Prepare Company Field Incident Report, sign the form, fax it to the Company Safety Manager.

5.11.5. Implement any immediate corrective actions needed.

5.12. Incident Notice Form

5.12.1. The Company shall provide documentation and communication of lessons learned and review of similar operations to prevent reoccurrence. Lessons learned are reviewed and communicated. Changes to processes must be placed into effect to prevent reoccurrence or similar events.

5.12.2. To communicate incident information and lessons learned from incidents the company Safety Manager shall send the Incident Notice to all work sites. The form shall be posted on employee bulletin boards and shall be discussed in weekly safety meetings until all employees at the job site have been informed of the incident.

5.13. Corrective Actions Resulting from Incident Investigations

5.13.1. Incident investigations should result in corrective actions, individuals should be assigned responsibilities relative to the corrective actions, and these actions should be tracked to closure.

5.13.2. Site/Field Managers are held accountable for closing corrective actions. Corrective actions for safety improvement input are posted at each site and tracked by the Safety Manager to ensure timely follow up and completion.

5.13.3. Corrective actions are also used as needed for revisions to site specific safety plans and the company's Safety and Health Management System.

5.14. Injury Classifications

5.14.1. Injuries shall be classified per the following:

5.14.1.1. First Aid – Dressing on a minor cut, removal of a splinter, typically treatment for household type injuries.

5.14.1.2. Lost Work Day Case (LWDC) – An injury that results in an employee being unfit to perform any work on any day after the occurrence of an occupational injury.

5.14.1.3. Number of Lost or Restricted Work Days – The number of days, other than the day of occupational injury and the day of return, missed from scheduled work due to being unfit for work or medically restricted to the point that the essential functions of a position cannot be worked.

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- 5.14.1.4. Occupational Injury – An injury which results from a work-related activity.
- 5.14.1.5. Occupational Illness – Any abnormal condition or disorder caused by exposure to environmental factors while performing work that resulted in medical treatment by a physician for a skin disorder, respiratory condition, poisoning, hearing loss or other disease (frostbite, heatstroke, sunstroke, welding flash, diseases caused by parasites, etc.). Do not include minor treatments (first aid) for illnesses.
- 5.14.1.6. Recordable Medical Case (RMC) – An occupational injury more severe than first aid that requires advanced treatment (such as fractures, more than one stitch, prescription medication of more than one dose, unconsciousness, removal of foreign body embedded in eye (not flushing), admission to a hospital for more than observation purposes) and yet results in no lost work time beyond the day of injury.
- 5.14.1.7. Restricted Work Day Case (RWDC) – An occupational injury which results in a person being unfit for essential functions of the regular job on any day after the injury but where there is no time lost beyond the day of injury. An example would include an injured associate who is kept at work but not performing within the essential functions of their regular job.
- 5.14.1.8. Work or Work-Related Activity – All incidents that occur in work related activities during work hours, field visits, etc. are reportable and are to be included if the occupational injury or illness is more serious than requiring simple first aid. Incidents occurring during off hours and incidents while in transit to or from locations that are not considered an employee’s primary work are not reportable.
- 5.14.2. The following are examples of incidents that will **not** be considered as recordable;
 - 5.14.2.1. The injury or illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs outside the work environment.
 - 5.14.2.2. The injury or illness results solely from voluntary participation in a wellness program or in flu shots, exercise class, racquetball, or baseball.
 - 5.14.2.3. The injury or illness is solely the result of an employee eating, drinking, or preparing food or drink for personal consumption (whether bought on the employer's premises or brought in). The injury or illness is solely the result of an employee doing personal tasks (unrelated to their employment) at the establishment outside of the employee's assigned working hours.
 - 5.14.2.4. The illness is the common cold or flu (Note: contagious diseases such as tuberculosis, brucellosis, hepatitis A, or plague are considered work-related if the employee is infected at work).

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6. Training

- 6.1. The Company shall train personnel in their responsibilities and incident investigation techniques. Personnel must be trained in their roles and responsibilities for incident response and incident investigation techniques. Training requirements relative to incident investigation and reporting are described below:
- 6.2. Training frequency will be based on the specific area of responsibility but shall not exceed once every two years.
- 6.3. Training requirements relative to incident investigation and reporting shall include:
 - 6.3.1. Awareness
 - 6.3.2. First Responder Responsibilities
 - 6.3.3. The Initial Investigation at the Accident Scene
 - 6.3.4. Managing the Accident Investigation
 - 6.3.5. Collecting Data
 - 6.3.6. Analyzing Data
 - 6.3.7. Developing Conclusions and Judgments of Need
 - 6.3.8. Reporting the Results

7. Appendix

- 7.1. Incident Notice Example
- 7.2. Loss Causation Model

8. Reference

- 8.1. OSHA 1960.29 – Accident Investigation

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INCIDENT NOTICE

This notice is to be posted on all bulletin boards and documented in safety meetings and toolboxes at all locations until all staff are aware of the contents

Vehicle Property Damage

Date: **XX-XX-XXXX**

WHAT HAPPENED?

Provide just a one line factual statement...no names! Example:

A worker damaged a company vehicle by striking a concrete block while making a right turn on a road between buildings.

INSERT PHOTO

INSERT PHOTO

HOW DID IT HAPPEN?

Provide a concise determination...make the message clear! Example:

The main cause of this incident was the unsafe employee behavior by choosing not to pay attention to objects in the area while driving.

WHAT DO WE DO NOW TO PREVENT THIS FROM HAPPENING AGAIN?

Insert your corrective actions...again no names. Example:

All drivers must:

- Continually assess road conditions and hazards and be prepared for any challenge that may approach them.
- Slow down around construction, large vehicles, emergency vehicles, wildlife, congested work areas, fog, rain or anything else that adds a hazard to your driving.

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Brunel Energy, Inc. Loss Causation Model

Lack of Control		
Failure to Maintain Compliance with Adequate Standards For:		
Leadership and Administration	Personal Protective Equipment	Health Control
Management Training	Planned Inspections	Program Evaluation System
Task Analysis & Procedures	Engineering Controls	Incident Investigation
Task Observations	Personal Communications	Group Meetings
Emergency Preparedness	General Promotion	Organizational Rules
Incident Analysis	Hiring & Placement	Purchasing Controls
Employee Training		Off-the-Job Safety

Basic Causes	
Personal Factors	Job Factors
Inadequate Capability	Inadequate Leadership or Supervision
Physical / Physiological	Inadequate Engineering
Mental / Psychological	Inadequate Purchasing
Lack of Knowledge	Inadequate Maintenance
Lack of Skill	Inadequate Tools, Equipment, Materials
Stress	Inadequate Work Standards
Physical / Physiological	Abuse or Misuse
Mental / Psychological	Wear and Tear
Improper Motivation	

Immediate Causes	
Substandard Practices	Substandard Conditions
Operating Equipment Without Authority	Inadequate Guards or Barriers
Failure to Warn	Inadequate or Improper Protective Equipment
Failure to Secure	Defective Tools, Equipment, or Materials
Operating at Improper Speed	Congestion or Restricted Action
Making Safety Devices Inoperable	Inadequate Warning System
Removing Safety Devices	Fire and Explosion Hazards
Using Defective Equipment	Poor Housekeeping, Disorder
Failing to Use PPE Properly	Noise Exposure
Improper Loading	Radiation Exposure
Improper Placement	Temperature Extremes

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Improper Lifting	Inadequate or Excess Illumination
Improper Position for Task	Inadequate Ventilation
Servicing Equipment in Operation	
Horseplay	
Under Influence of Alcohol and/or Other Drugs	

Incident	
Contacts	
Struck Against (Running or Bumping Into)	Caught On (Snagged, Hung)
Struck By (Hit by Moving Object)	Caught Between (Crushed or Amputated)
Fall to Lower Level	Contact With (Electricity, Heat, Cold Radiation, Caustics, Toxics, Noise)
Fall on Same Level (Slip and Fall, Trip Over)	Overstress, Overexertion, Overload
Caught In (Pinch and Nip Points)	

Loss		
Personal Harm	Property Damage	Process Loss
Major Injury or Illness (Hospitalization)	Major (> \$50,000)	Major (> \$50,000)
Serious Injury or Illness (Medical Aid)	Serious (> \$1,000)	Serious (> \$5,000)
Minor Injury or Illness (First Aid)	Minor (< \$1,000)	Minor (< \$5,000)