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Brunel Energy, Inc.

Injury Illness Recordkeeping

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1. Purpose

- 1.1. Brunel Energy, Inc., hereinafter referred to as, the “Company,” has established a program compliant with OSHA 29 CFR 1904, OSHA Injury Illness Recordkeeping and Reporting Requirements.

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. **First Aid** is defined as follows:
 - 3.1.1. Using a non-prescription medication at non-prescription strength (for medications available in both prescription and non-prescription form, a recommendation by a physician or other licensed health care professional to use a non-prescription medication at prescription strength is considered medical treatment for recordkeeping purposes).
 - 3.1.2. Administering tetanus immunizations (other immunizations, such as Hepatitis B vaccine or rabies vaccine, are considered medical treatment).
 - 3.1.3. Cleaning, flushing or soaking wounds on the surface of the skin.
 - 3.1.4. Using wound coverings such as bandages, Band-Aids™, gauze pads, etc.; or using butterfly bandages or Steri-Strips™ (other wound closing devices such as sutures, staples, etc., are considered medical treatment).
 - 3.1.5. Using hot or cold therapy.
 - 3.1.6. Using any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc. (devices with rigid stays or other systems designed to immobilize parts of the body are considered medical treatment for recordkeeping purposes).
 - 3.1.7. Using temporary immobilization devices while transporting an accident victim (e.g., splints, slings, neck collars, back boards, etc.).
 - 3.1.8. Drilling of a fingernail or toenail to relieve pressure or draining fluid from a blister.

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- 3.1.9. Using eye patches.
- 3.1.10. Removing foreign bodies from the eye using only irrigation or a cotton swab.
- 3.1.11. Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means.
- 3.1.12. Using finger guards.
- 3.1.13. Using massages (physical therapy or chiropractic treatment are considered medical treatment for recordkeeping purposes).
- 3.1.14. Drinking fluids for relief of heat stress.
- 3.2. ***Injury or Illness*** is an abnormal condition or disorder. Injuries include a cut, fracture, sprain, or amputation. Illnesses include both acute and chronic illnesses, such as, but not limited to, skin disease, respiratory disorder, or poisoning.
- 3.3. ***Medical Treatment*** is the management and care of the patient to combat disease or disorder. Medical treatment does not include:
 - 3.3.1. Visits to a physician or other licensed health care professional solely for observation or counseling.
 - 3.3.2. The conduct of diagnostic procedures, such as x-rays and blood tests, including the administration.

4. Responsibilities

- 4.1. Manager(s):
 - 4.1.1. Managers are responsible for implementing, supporting, and enforcing the requirements of this policy in their locations.
 - 4.1.2. Managers will determine the proper classification of work-related injuries based on OSHA recordkeeping guidelines 29 CFR 1904.5.
- 4.2. HSE Supervisor(s):
 - 4.2.1. Supervisors are responsible for assisting management in the implementation of this policy.
- 4.3. Employee(s):
 - 4.3.1. Promptly report actual or suspected work-related injury and illnesses to their supervisor or manager.
- 4.4. Subcontractor(s):
 - 4.4.1. Promptly report actual or suspected work-related injury and illnesses to their supervisor or manager.

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5. Requirements

- 5.1. This policy shall cover all Company locations.

6. Procedure

- 6.1. Recordkeeping or reporting a work-related injury, illness, or fatality does not mean the Company or employee was at fault, that an OSHA rule has been violated, or that the employee is eligible for workers' compensation or other benefits. The Company will keep written records of fatalities, injuries, and illnesses must record each fatality, injury, and illness that:
- 6.1.1. Is work related.
 - 6.1.2. Is a new case.
 - 6.1.3. Meets one or more of the general recording criteria.
- 6.2. Determination of Work-Relatedness
- 6.2.1. An injury or illness shall be considered work-related if an event or exposure in the work environment either caused or contributed to the resulting condition or significantly aggravated a pre-existing injury or illness. Work-relatedness is presumed to be the cause of injuries and illnesses resulting from events or exposures occurring in the work environment.
 - 6.2.2. A preexisting injury or illness has been significantly aggravated, for purposes of OSHA injury and illness recordkeeping, when an event or exposure in the work environment results in any of the following:
 - 6.2.2.1. Death, provided that the preexisting injury or illness would likely not have resulted in death but for the occupational event or exposure.
 - 6.2.2.2. Loss of consciousness, provided that the preexisting injury or illness would likely not have resulted in loss of consciousness but for the occupational event or exposure.
 - 6.2.2.3. One or more days away from work, or days of restricted work, or days of job transfer that otherwise would not have occurred but for the occupational event or exposure.
 - 6.2.2.4. Medical treatment in a case where no medical treatment was needed for the injury or illness before the workplace event or exposure, or a change in medical treatment was necessitated by the workplace event or exposure.
 - 6.2.3. An injury or illness is a preexisting condition if it resulted solely from a non-work-related event or exposure that occurred outside the work environment.
 - 6.2.4. Injuries and illnesses that occur while an employee is on travel status are work-related if, at the time of the injury or illness, the employee was engaged in work activities "in the interest of the employer."

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6.3. Determination of New Cases

6.3.1. An injury or illness shall be determined a “new case” if:

- 6.3.1.1. The employee has not previously experienced a recorded injury or illness of the same type that affects the same part of the body.
- 6.3.1.2. The employee previously experienced a recorded injury or illness of the same type that affected the same part of the body but had recovered completely (all signs and symptoms had disappeared) from the previous injury or illness and an event or exposure in the work environment caused the signs or symptoms to reappear.
- 6.3.1.3. For occupational illnesses where the signs or symptoms may recur or continue in the absence of exposure in the workplace, the case must only be recorded once.
- 6.3.1.4. When an employee experiences the signs or symptoms of an injury or illness because of an event or exposure in the workplace, such as an episode of occupational asthma, the incident shall be treated as a new case.

6.4. General Recordkeeping Criteria

6.4.1. A work-related injury or illness must be recorded if it results in one or more of the following:

- 6.4.1.1. Death
- 6.4.1.2. Days Away from work.
- 6.4.1.3. Restricted work or transfer to another job.
- 6.4.1.4. Medical treatment beyond first aid.
- 6.4.1.5. Loss of consciousness.

6.4.2. A significant injury or illness diagnosed by a physician or other licensed health care professional.

6.4.3. An injury or illness that results in death shall be recorded by entering a check mark on the OSHA 300 Log in the space for cases resulting in death. The work-related fatality shall be reported to OSHA within eight (8) hours, as required by § 1904.39.

6.4.4. When an injury or illness involves one or more days away from work, injury or illness shall be recorded on the OSHA 300 Log with a check mark in the space for cases involving days away and an entry of the number of calendar days away from work in the number of days column. If the employee is out for an extended period, an estimate of the days that the employee will be away shall be estimated and update the day count when the actual number of days is known.

6.4.5. The count for days away shall begin on the day after the injury occurred or the illness began.

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- 6.4.6. In the event a physician or other licensed health care professional recommends that the worker stay at home but the employee comes to work anyway, the injuries or illnesses shall be recorded on the OSHA 300 Log using the check box for cases with days away from work and enter the number of calendar days away recommended by the physician or other licensed health care professional.
- 6.4.7. In the event a physician or other licensed health care professional recommends that the worker return to work but the employee stays at home anyway, the recorded count of days away from work apply to the date the physician or other licensed health care professional recommends that the employee return to work.
- 6.4.8. The number of calendar days the employee was unable to work because of the injury or illness shall be counted, regardless of whether the employee was scheduled to work on those day(s). Weekend days, holidays, vacation days or other days off are included in the total number of days recorded if the employee would not have been able to work on those days because of a work-related injury or illness.
- 6.4.9. Where an employee is absent from work due to illness or injury for more than 180 calendar days, entering 180 in the total days away column shall be considered adequate.
- 6.4.10. Where an employee leaves The Company for some reason unrelated to the injury or illness, such as retirement, a plant closing, or to take another job, do not continue to count days away from work or days of restriction/job transfer. If the employee leaves The Company because of the injury or illness, estimate the total number of days away or days of restriction/job transfer and enter the day count on the 300 Log.
- 6.4.11. Enter the number of calendar days an employee is away for the injury or illness on the OSHA 300 Log for the year in which the injury or illness occurred. If the employee is still away from work because of the injury or illness when the annual summary is being prepared, estimate the total number of calendar days the employee is expected to be away from work, use this number to calculate the total for the annual summary, and then update the initial log entry later when the day count is known or reaches the 180-day cap.
- 6.4.12. When an injury or illness involves restricted work or job transfer but does not involve death or days away from work, record the injury or illness on the OSHA 300 Log by placing a check mark in the space for job transfer or restriction and an entry of the number of restricted or transferred days in the restricted workdays column within 7 days of receiving the injury or illness information.
- 6.4.13. Restricted work occurs when, as the result of a work-related injury or illness:
- 6.4.13.1. The employee is kept from performing one or more of the routine functions of his or her job, or from working the full workday that he or she would otherwise have been scheduled to work.

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- 6.4.13.2. A physician or other licensed health care professional recommends that the employee not perform one or more of the routine functions of his or her job, or not work the full workday that he or she would otherwise have been scheduled to work.
- 6.4.14. For recordkeeping purposes, an employee's routine functions are those work activities the employee regularly performs at least once per week.
- 6.4.15. Restricted work or job transfers shall not be recorded if The Company, or the physician or other licensed health care professional, imposes the restriction or transfer only for the day on which the injury occurred, or the illness began.
- 6.4.16. A recommended work restriction is recordable only if it affects one or more of the employee's routine job functions.
- 6.4.17. A partial day of work is recorded as a day of job transfer or restriction for recordkeeping purposes, except for the day on which the injury occurred or the illness began.
- 6.4.18. Where a work-related injury or illness results in medical treatment beyond first aid, it shall be recorded on the OSHA 300 Log within seven calendar days of receiving information that the injury occurred. If the injury or illness did not involve death, one or more days away from work, one or more days of restricted work, or one or more days of job transfer, enter a check mark in the box for cases where the employee received medical treatment but remained at work and was not transferred or restricted.
- 6.4.19. A work-related injury or illness shall be recorded if the worker becomes unconscious, regardless of the length of time the employee remains unconscious.
- 6.4.20. Work-related cases involving cancer, chronic irreversible disease, a fractured or cracked bone, or a punctured eardrum shall always be recorded under the general criteria at the time of diagnosis by a physician or other licensed health care professional.
- 6.5. Recording Criteria for Needlestick and Sharp Injuries
 - 6.5.1. Work-related needlestick injuries and cuts from sharp objects that are contaminated with another person's blood or other potentially infectious material shall be recorded and entered on the OSHA 300 Log as an injury.
- 6.6. Recordkeeping Criteria for Cases Involving Medical Removal
 - 6.6.1. If an employee is medically removed under the medical surveillance requirements of an OSHA standard, it shall be recorded on the OSHA 300 Log.
- 6.7. Recordkeeping Criteria for Cases Involving Occupational Hearing Loss

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6.7.1. Where an employee's hearing test (audiogram) reveals that the employee has experienced a work-related Standard Threshold Shift (STS) in hearing in one or both ears, and the employee's total hearing level is 25 decibels (dB) or more above audiometric zero (averaged at 2000, 3000, and 4000 Hz) in the same ear(s) as the STS, it shall be recorded on the OSHA 300 Log.

6.8. Recordkeeping Criteria for Work-Related Tuberculosis Cases

6.8.1. Where the employee has been occupationally exposed to anyone with a known case of active tuberculosis (TB), and that employee subsequently develops a tuberculosis infection, as evidenced by a positive skin test or diagnosis by a physician or other licensed health care professional, it shall be recorded on the OSHA 300 Log by checking the "respiratory condition" column.

6.9. Annual Summary

6.9.1. At the end of the calendar year, the Company shall:

6.9.1.1. Review the OSHA 300 Log to verify that the entries are complete and accurate, and correct any deficiencies identified.

6.9.1.2. Create an annual summary of injuries and illnesses recorded on the OSHA 300 log.

6.9.1.3. A Company official will certify the summary that he or she has examined the OSHA 300 log and based on their knowledge of the process by which the information was recorded, the annual summary is correct and complete.

6.9.1.4. Post the annual OSHA 300A summary in a conspicuous place available to employees no later than February 1st and shall be kept in place until April 30th.

6.10. Records

6.10.1. The Company shall provide limited access to the injury and illness records for employees and their designated representatives.

6.10.2. Where an authorized government representative asks for the records kept under Part 1904, The Company shall provide copies of the records within four (4) business hours.

6.11. Reporting Fatalities and Multiple Hospitalization Incidents to OSHA

6.11.1. Within eight (8) hours after the death of any employee from a work-related incident or the in-patient hospitalization of three or more employees because of a work-related incident, The Company shall orally report the fatality/multiple hospitalization to OSHA.

7. Training

7.1. The Company will provide training for employees whose roles include the OSHA Recordkeeping process.

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8. Recordkeeping

- 8.1. The OSHA 300 Log, the privacy case list (if one exists), the annual summary and the OSHA 301 Incident Report forms must be retained for five years following the end of the calendar that these records cover.

9. Reference

- 9.1. OSHA 29 CFR 1904 - OSHA Injury and Illness Recordkeeping and Reporting Requirements.