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| Document Safety Policy | Published 1/1/23 | Valid for Billerud North America |
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Document: Immediate Reporting and Investigation Policy (BNA)

Purpose

Immediate reporting of incidents is a critical element of a well-established workplace health and safety program. A delay in reporting or waiting to report an incident until the end of the work shift allows for critical information to be missed. There is an expectation that all incidents will be reported immediately by any team member involved. Some of the reasons for immediate reporting of incidents are:

- An injury shall be treated promptly which can easily keep a minor injury from becoming a serious medical condition. An example is treating a minor cut to prevent an infection.
- An accident may result in damage to equipment, property or the environment that needs immediate attention to eliminate hazardous conditions. Examples are crane damage or a chemical release.
- An investigation must be initiated promptly to identify root causes and corrective actions to prevent similar events from occurring.
- Many near misses are very severe and create an opportunity for us to correct an unsafe condition prior to someone getting injured.

Extent

This reporting and investigation policy applies to all Billerud NA employees, contractors and visitors (while working on Billerud property).

Responsibility & Execution

1. It is the responsibility of the person(s) involved in the incident to report it immediately. If the incident involves a contractor, the Billerud person responsible for that contractor will take the lead on this.

Immediate reporting can be done a number of ways. Examples include:

- Notifying your supervisor, foreman or area manager and entering the information into SITS.
- Reporting to Health Services and entering the information into SITS.
- Paging or calling the on-call person for your respective area and entering the information into SITS.

If the person involved isn't physically capable of reporting the incident or entering a SITS, the report can be entered by anyone (coworker, supervisor, emergency responder, nurse, etc).

The incident scene should remain as is until the investigation is complete, whenever possible. This allows for a thorough investigation to be completed, photos taken, etc.

2. Once that notification is made, it is the responsibility of the supervisor (or designee) to conduct an investigation.

- The contractor company’s supervisor (or designee) is responsible for conducting an investigation for any incident involving a contractor.
- If the incident involves any type of injury, the person(s) must first be seen by the Mill Nurse or Medical First Responder (an injured contractor should be seen their own medical resources).
- Refer to the “Investigation Requirements Guideline for Cority/SITS” document to determine who should be involved in an investigation and what level of detail is needed to complete the investigation (based on the incident type and injuries and/or damage sustained).

Conducting a timely and thorough investigation insures that:

- The person(s) involved quickly receive the care necessary,
 - Any potential or further impact to people, the environment or property has been mitigated,
 - The supervisor (or designee) and person(s) involved meet to discuss the incident including the cause and corrective actions and collect any relevant information and/or photos of this incident,
 - The investigation will be completed within the work shift, prior to the supervisor leaving work (unless an official handoff is made to someone else to complete the investigation). Please note: corrective actions do not have to be completed prior to marking the investigation complete.
3. The investigation should be reviewed and approved/rejected by the Area Manager within seven days, ensuring all necessary details are included, all agreed upon recommendations and actions will be implemented and completed in a reasonable timeframe.
 4. The Safety Department will review the final investigation and approve/reject it within three days after Area Manager approval.
 - The investigation findings will be shared with mill leadership for all OSHA-Recordable injuries, significant property damage incidents and serious near misses.
 - Any SIF or SIF Potential will be reviewed with Billerud leadership and shared with all employees.
 5. We each have a responsibility to adhere to this policy. Failure to report an incident may result in discipline as outlined in the current labor agreement (where applicable).

Definitions and Incident Classifications

Accident – an unplanned event that results in personal illness, injury or property damage.

Chemical Spill (or Release) – An incident that results in the spill or release of a chemical inside or outside of the facility, regardless of quantity released. The Environmental Department must be notified, additional resources (Emergency Response Team) may be called, or clean-up may be needed.

Contractor – Any person working for a company with a contract agreement with Billerud and is supervised or managed by the contract company. The contract company may also be a sub-contractor. Examples include but are not limited to security services; maintenance contractors; engineering consultants; or staffing agencies. Delivery or truck drivers, or anyone dropping off/picking up parts would not typically be considered contractors under this policy.

Cumulative Trauma Disorder – The excessive wear and tear on tendons, muscles and sensitive nerve tissue caused by continuous or repetitive use over an extended period of time. Examples include but are not limited to carpal tunnel syndrome or tendonitis.

Employee – Any person working for Billerud in a permanent, temporary, or part-time capacity with a reporting structure to another Billerud employee. This includes all management and hourly team members.



Fire – An incident that involves any smoldering, smoking or burning of flammable or combustible materials such as paper, wood, cloth, liquids, gases, greases, metals, plastics, rubber or energized electrical equipment. Any use of a fire extinguisher must be reported.

First Aid Injury (also referred to as a Minor Injury) – An injury that requires medical attention that is usually administered immediately after the injury occurs and at the location where it occurred. It often consists of a one-time, short-term treatment and requires little technology or training to administer. Examples include but are not limited to cleaning minor cuts, scrapes, or scratches; treating a minor burn; applying bandages and dressings; the use of non-prescription medicine; draining blisters; removing debris from the eyes; massage; and drinking fluids to relieve heat stress. Note: administering prescription medications used solely for diagnostic purposes is considered first aid treatment.

Illness – An abnormal acute or chronic condition or disorder resulting from an event or exposure in the work environment. Examples include but are not limited to heat-related illness; poisoning or illness caused by inhalation; or a skin disease or reaction.

Immediate Reporting – Reporting an incident immediately after it occurs and during the person(s) work shift. Cumulative trauma disorders must be reported upon the onset of symptoms. Examples include but are not limited to reporting a crane incident immediately after it happens without further movement of the crane; reporting a slip or trip after it happens even if no pain is experienced; or reporting a close call (near miss).

Incident – A planned or unplanned event that may or may not have resulted in illness, injury, property damage or environmental impact, that occurred while at work, on work time or on Billerud property, involving an employee, visitor or contractor. Examples include but are not limited to an accident; health, safety, environmental or security policy violation; injury or illness; property damage; safety concern, intervention or observation; and/or near miss.

Life-Altering Injury or Illness – An injury or illness that results in permanent damage to or loss of an internal organ, bodily function or body part. Examples include but are not limited to head or spinal cord injuries; temporary or permanent paralysis; amputation or a significant fracture resulting in limited use; severe burns; or a permanently damaged or dismembered body part.

Life-Threatening Injury or Illness – An injury or illness that if not immediately addressed, has the potential to result in death and will require intervention and/or emergency response to include life-sustaining support. Examples include but are not limited to significant blood loss; damage to the brain or spinal cord; use of an external defibrillator or cardiopulmonary resuscitation; or severe trauma to vital organs.

Lost Time Injury – An injury that requires days away from work beyond the date of injury or onset of illness. Examples include but are not limited to a fatality, days away from work due to injury or surgery.

Near Miss – An unplanned event that did not result in injury, illness or damage, but had the potential to do so. Only a fortunate break in the chain of events prevented an injury, fatality or damage; in other words, a miss that was nonetheless very near. Although near misses cause no immediate harm, near miss reporting is vitally important to preventing serious, fatal and catastrophic incidents that are less frequent but far more harmful. Examples include but are not limited to someone getting a chemical on their skin but not receiving medical treatment (washing may be considered preventative depending on the scenario); a fall that did not result in medical treatment; diagnostic procedures; or two vehicles almost colliding.



Non-Occupational (Non-Occ) Injury or Illness – An injury or illness that is not related to or caused by a work condition, event or exposure. If the injury or symptoms showed itself in the workplace but was caused by events or exposure outside of the workplace, the injury or illness is not considered work-related. Examples include but are not limited to heart attack; illness caused by food; or reaction to a medication prescribed for a personal health condition.

OSHA-Recordable Injury – An injury that requires medical treatment beyond first aid. Examples include, but are not limited to loss of consciousness or body part; an injury requiring surgery, lost time or work restrictions; irreversible diseases; fractured or cracked bone or tooth; punctured ear drum or hearing loss; wound closing devices such as sutures or staples; physical therapy or chiropractic treatment; or medication prescribed at prescription strength.

Process Safety Management (PSM) – The management of hazards associated with processes using highly hazardous chemicals. All PSM-related incidents require a thorough investigation.

Property (or Facility) Damage – An incident that resulted in loss of material/product, or harm impairing the function or condition of property or equipment from environmental exposure, fire, severe weather, terrorism/disgruntled employee, collision, misuse, or a vehicle. Examples include but are not limited to a fire resulting from hot work, vehicle accident, crane incident or product loss to sewer.

Restricted Duty Injury (also referred to as Work Restriction) – An injury that requires restricted work activity or job transfer, beyond the date of injury or onset of illness. Examples include but are not limited to a person not being able to fully perform all regular work activities such as no use of right arm, or limited to four hours of work per day.

Safety Concern (also referred to as Unsafe Condition) – Any condition that when improved and corrected, results in a safer work environment.

Safety Conversation – An open conversation between two or more people about a safety topic, job/task, unsafe condition, etc. to gain an understanding of the work condition(s) or to discuss possible improvements. A follow-up change to a process or behavior may or may not be necessary.

Safety Incident Tracking System (SITS) – refers to the computer-based data-entry system that all health and safety incidents and investigations are reported and store in.

Safety Intervention – When a person takes a deliberate approach into a situation in order to influence events by improving the situation to prevent an undesirable consequence regarding the health and safety of another person. An example would be addressing a traffic violation (speed, seatbelt use, etc.); or preventing someone from walking under a suspended load.

Safety Observation – Visually checking or observing a person complete a task to evaluate safe and/or unsafe conditions and/or actions in a work area or at a given time. There may be a conversation between the observer(s) and person(s) being observed. A follow-up change to a process or behavior may or may not be necessary. An example could be observing someone complete a task.

Serious Injury or Fatality (SIF) – An incident that results in a fatality, life-threatening or life-altering injury or illness.

Serious Injury or Fatality (SIF) Potential – Any incident or exposure that is determined to have credible potential to result in a fatality, life-threatening or life-altering injury or illness. Examples include but are not

limited to exposure to a harmful substance and/or hazard; a fall from heights; or a near miss or injury that could have had life changing results.

Visitor – A person not defined as an employee or contractor at the time of the visit, while on company property for reasons other than to conduct work for Billerud. Examples include but are not limited to a mill tour; a sales visit; regulatory agency inspection; or attending a meeting or interview.

Work-Relatedness (also referred to as Occupational) – You must consider an incident to be 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.

