



Accident & Incident Reporting Standard

1. Purpose

The purpose is to create a consistent Standard for reporting and managing of all types of accidents and incidents related to HIMADRI SPECIALITY CHEMICAL LIMITED directly or indirectly.

2. Scope and key requirements

This Standard is mandatory and applies to all manufacturing units, plants, offices, R&D Centers, Warehouses, Laboratories of HIMADRI SPECIALITY CHEMICAL LIMITED.

All accidents/incidents occurring to employees, contractor, sub-contractors, workmen, service providers, stakeholders who are working or associated with HIMADRI SPECIALITY CHEMICAL LIMITED work at all premises, directly or indirectly or at home in case of home office working is applicable. This also includes any accidents on the way to or from work (door to door) and all incidents involving employees whilst away from home on company business must be reported. HR Department will be monitoring the reporting of direct and indirect employees of HIMADRI SPECIALITY CHEMICAL LIMITED. Incidents will be reported against individual manufacturing unit, which can take action.

2. Duty of Care for People

The prime concern of HIMADRI SPECIALITY CHEMICAL LIMITED is the safety, security and well-being of employees, contractor, sub-contractors, workmen, service providers, stakeholders who are working or associated with HIMADRI SPECIALITY CHEMICAL LIMITED work at all premises, directly or indirectly. Plant Managers are directly responsible for ensuring the following:

- Prompt and effective treatment for the Injured Person (IP)
- Arrange basic needs and psychological support to the injured person, his/ her families and his/ her colleagues.

3. Legal Compliance

Accidents / incidents requiring legal reporting to local or central Government and requiring statutory compliance, will be fulfilled on time without any compromise or concession. Classification of Injuries/ Accidents / incidents can only be modified with the approval of the Sr. SR. VP HSE.

4. Non-Retaliation

Employees, contractors, sub-contractors, workmen, service providers, stakeholders involved in an accident / incident or reports an accident/incident, he/ she shall not be victimized or face retaliation or other legal consequence as a result of being involved or reporting any accident/incident.

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Approved by: <i>S. Chaurasiya</i>	Signature: <i>[Signature]</i>



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3. Definitions

3.1 Severe accident/incidents

Includes:

- Fatality
- Permanent injury
- Accident resulting in an in-patient hospitalization regardless of length of time, for other than medical observation or diagnostic testing
- Toxic emission
- Any fire, or explosion requiring the intervention of the fire department or the evacuation of the building
- Major spill, or chemical release.
- Incidents involving 1 or more person count as 1 Severe Accident.

Excludes:

- Accidents occurring during normal commuting to and from work.

3.2 Lost Time Injury (LTI)

Includes:

- Work-related fatality, injury or occupational illness/disease resulting in the loss of 1 full day or more, not including the day or shift on which the accident occurred. If the day following the incident is a non-working day, the incident is still an LTI if the person would not have been fit for work.
- An occupational illness/disease is any physical or mental condition or disorder that is abnormal for a worker that was caused by his or her exposure to chemicals, physical activities or other factors directly associated with the workplace.
- Occurring where the primary purpose of the journey involved travelling to/from work whilst on call or whilst working away from home;
- Occurring whilst travelling to or from, or whilst attending a company sponsored event/company social activity where attendance was expected by management (for example "annual dinners"; excludes sports events, except if the incident is not directly linked to this sport event);
- Where a pre-existing condition has been aggravated by the workplace or working environment.

Excludes incidents:

- Occurring whilst travelling from/to home to/from work as part of NORMAL COMMUTING (normal commuting being the usual journey from "home" to the usual place of work)

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- Involving personal health issues, provided that the work had been suitably and sufficiently adapted.

3.3 Medically Treated Injuries (MTI)

Medically Treated Injuries are defined to include all hospital visits and any consultation with a registered medical practitioner/ surgeons and dental surgeons but does not include healthcare professionals/first aiders/first responders/paramedics. All work related medically treated injuries and occupational illnesses/diseases

Includes:

- All LTIs
- Job Transfers or Restrictions.
- All medically treated incidents like:
 - Occurring whilst travelling from/to Home and to/from Work as part of NORMAL COMMUTING;
 - Occurring whilst away from home on company business in the employees' free time or non-company activities;
 - Occurring at a company sponsored event/company social activity;
 - Occurring whilst travelling to/from a company sponsored event/company social activity.

Excludes:

- Involving personal health issues, provided that the work had been suitably and sufficiently adapted.

3.4 Other injuries

Includes:

- All MTIs.
- First aid/minor injuries as well as all injuries/health accidents incurred during work and normal commuting to and from work. Those injuries are reported monthly as a number in the HSE database except for serious commuting and health accidents which also require a full report.

3.5. work-related injuries sustained while “working from home”

For an injury occurring at home to be considered as work-related, the employee’s workstation and its immediate environment must have been adequately organised to work safely, and actions at the time of the injury must have had a necessary or natural connection to the work. Evidence of this must be provided by the employee following the guidelines mentioned below.

When	Where	Criteria to classify an injury as work-related
Before start of workday or after the end of workday		These injuries are not work-related
During work	At the workstation	- the workstation was risk-assessed

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		<ul style="list-style-type: none"> - the workstation was suitably organised and equipped for the work to be carried out safely - no non-work-related factor contributed to the accident (eg: tripping over the dog while rushing to answer a call).
During pauses	Away from the workstation	<ul style="list-style-type: none"> - The pause was of reasonable duration (not exceeding equivalent pauses taken at a HIMADRI SPECIALITY CHEMICAL LIMITED place of work) - The activity would have been carried out similarly if in a HIMADRI SPECIALITY CHEMICAL LIMITED office (eg: coffee or lunch break, toilet visit, but not cooking, playing with the children, or going out for a walk) - The accident was not caused, or the injury made worse by the condition of the location or equipment (tripping on a rug, falling due to slippery floor, would make the accident not work-related)
Outside pauses		<ul style="list-style-type: none"> - The activity was required to carry out HIMADRI SPECIALITY CHEMICAL LIMITED work - The activity would have been carried out similarly if in a HIMADRI SPECIALITY CHEMICAL LIMITED Office - The accident was not caused, or the injury made worse by the condition of the location or equipment (tripping on a rug, falling due to slippery floor, would make the accident not work-related)

3.6. Dangerous Occurrences (DO)

A Dangerous Occurrence (DO) must have occurrence of an incident with or without actual damage, whether work related or not, that could have resulted in LTI/MTI or more serious outcome, but did not. A Dangerous Occurrence that could have resulted in a severe accident/incident is a Serious Dangerous Occurrence. Reporting as a Dangerous Occurrence takes precedence over reporting as a minor injury or first-aid (minor means Non LTI/MTI Injuries).

Includes Incidents: (example)

- Fire not resulting in death or bodily injury.
- Busting of steam pressure parts not resulting in death or bodily injury.

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- Explosion of pressure vessels not resulting in death or bodily injury.
- Collapse of building/floor, lifting equipment not resulting in death or bodily injury.
- Crane failure not resulting in death or bodily injury.
- Falling Objects etc.
- Near misses.

Excludes:

- LTI/MTI incident

Serious Dangerous Occurrences that could have resulted in a severe accident/incident require a full report. All process safety related dangerous occurrences are considered as serious dangerous occurrences and have specific reporting categories. Dangerous Occurrences that could not have resulted in a severe accident/incident must be investigated locally.

3.7. Improvement opportunities (IO)

All ideas aimed at continuous improvement, including Safety. Safety Improvement Opportunities (SIO) are ideas aimed at improving Safety. An Improvement opportunity with a permanent corrective action (IOPA) is an IO having led to the implementation of a Permanent Corrective Action. IOPA are reported monthly as a number in the HSE database.

3.8. Environmental incident

Unplanned and sudden release to the environment - (smoke - chemical spill, oil Spill, fly tipping, waste issue, sewage leak, ETP leak/ overflow etc), irrespective whether fully controlled or contained and cleaned-up, must be reported, giving full details of particulars of material released with quantity.

Serious environmental incidents are those that are not immediately fully contained.

3.9. Serious government inspections, investigations, and legal proceedings

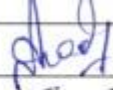

Any inspection resulting in a regulatory non-compliance or legal action against HIMADRI SPECIALITY CHEMICAL LIMITED must be considered as serious and must be reported immediately.

3.10. Safety audits

Safety Audits / Safety Observations shall be done regularly by direct and indirect employees including contractual employees and stake holders and visitors. The records of Safety Audits/ Safety Observation with counts must be kept in respective department where they were carried out locally and counts must reflect in monthly report. Audit participation must be consistently aiming at 85% participation. The number undertaken is reported monthly.

3.11. Risk Assessment:

Management Staff shall carry out Risk Assessment and Deep Dive Audit periodically and all records must be maintained at respective department where they were carried out locally and counts must reflect in monthly report.

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4. Reporting and Handling of Incidents

4.1. Stop at Incident

A Stop at Incident is a Policy which will enforce immediate stop of work in an area where an injury has happened - requiring an urgent medical attention and incidents where the potential outcome could have been severe in nature. This Policy shall be implemented where ever applicable judiciously by the HOD. The Area Manager along with HSE Manager will lead a thorough accident/incident investigation. Appropriate corrective measures will be implemented, and an action plan initiated to prevent recurrence. Only after this process has been completed and upon full satisfaction of HOD will normal work activities be allowed to resume.

4.2. Immediate escalation (Fatality/ severe accidents/incidents, significant governmental inspections, and legal proceedings)

Immediate: Managers must ensure proper escalation of initial information about every severe accident/incident to their HOD without any delay.

Immediate: HODs will contact by phone Chief Executives and CEO.

Immediate: Local Site HSE person will contact by phone their HSE Manager who will SR. VP HSE

It may be useful to designate the single point of contact to avoid confusion and miscommunication.

4.3. Initial reporting

All severe accidents/incidents, all LTIs, all MTIs, and all serious dangerous occurrences must be reported in the HSE database within 24 hours. If any doubt exists that an accident/incident will result in lost time, it must be recorded as an LTI as soon as possible; if the result changes it can be modified or reclassified after approval by the SR. VP HSE.

All other incidents have to be reported at the end of each month. See the table below for guidance.

Incident type / Reporting deadline	24 hours max.	Monthly report
Fatality	√	
Severe accidents/incidents	√	
LTIs	√	
MTIs	√	
Serious Dangerous Occurrences	√	
Process Safety related Dangerous Occurrences	√	
High Potentially Dangerous Occurrences	√	
Serious environmental incidents	√	
Other environmental incidents	√	
Other government inspections, investigations, legal proceedings and media coverage	√	
Low Potentially Dangerous Occurrences	-	√
All Near Misses	-	√
First Aid/ Minor Injuries	-	√
Risk Assessment	-	√

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Safety Audits	-	√
Safety Observations		

4.4 Investigation

First Hand Information of all Accident/ Incidents/ Dangerous Occurrences must be published within 8 hours by the concerned Manager/ HOD.

Detailed Investigation using 8D Methodology (initial findings, root causes, corrective and preventive actions) shall be initiated immediately by respective Manager (s) involving the team and it must be completed within 60 days for Fatality/ LTI/ MTI and 90 for others. A formal review must take place within 2 weeks after the incident with the CEO and SR. VP HSE, during which the 8D will be presented.

Safety Alert to be published with 48 hours by HSE Department in one slide containing the following:

- Accident / Incident Description with photograph/ diagram.
- Initial Findings
- Containment Action – (D3)

Lesson Learnt Sheet (LLS) will be published by Manager in consultation with HSE Manager after completion of 8D Methodology for horizontal deployment with the purpose to prevent reoccurrence. An assurance of LLS must be obtained from other departments and manufacturing Units. LLS will contain the summarized version of D-1 To D8 as follows:

- Summary of the accident/incident,
- Its root causes
- The corrective actions

Line PPS may be used for the investigation of first aid/minor injuries and other dangerous occurrences.

4.5 Internal communication

For all severe accidents/incidents, LTI, MTI, and serious dangerous occurrences all documentation (safety alert, 8D report, lessons learned sheet) must be uploaded in the HSE database.

It must be prepared, formally presented to the BU president and SR. VP HSE within 3 weeks after the accident/incident.

The most severe accidents/incidents may require deeper analysis and reflection on the company organisation and processes. Hence for selected severe accidents/incidents a Red Stripe will be prepared by SR. VP HSE and reviewed by the CEO and published within 6 months after the accident/incident.

Each department manager is responsible for organizing effective communication of Safety Alerts, Lessons Learned Sheets and Red Stripes among all the employees.

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4.6. External communication

Any external communication with the public and media must be approved by the CEO.

5. LTI Frequency Rate

Frequency rates will be computed on 12 month rolling data per 1,000,000 hours worked.

5.1 LTI Severity Rate

Total number of calendar days lost due to LTIs per 1,000,000 hours worked. A fatality counts for 180 days. An occupational illness counts for a maximum of 180 days.

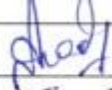

5.2 MTI Frequency Rate

Frequency rates will be computed on 12-month rolling data per 1,000,000 hours worked.

6. Accountability

HODs are accountable for ensuring the standard is fully implemented and adhered to.

Manager, HSE Manager and HR Manager are jointly responsible for the timely and proper reporting of incidents/accidents and serious dangerous occurrences. Any failure to report constitutes gross misconduct and will be dealt with accordingly.

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Management Action in the event of an Incident/ Accident

Abbreviation used:

IP = Injured Person
 MTI = Medical Treated Injury
 RWC = Restricted Work Case.
 LTI = Lost time injury
 DO = Dangerous Occurrence

Incident / Accident

Take Injured Person to OHC for immediate first-aid or to nearest Hospital/ Health Centre depending on gravity of injury.

Information to Line Manager, HOD, HSE Manager, HR

IS IT LTI/MTI/DO OR RECORDABLE INJURY?

NO

1. Report (FIR) within 24 hours
2. Immediate Mitigation Action
3. Discussion of incident in Tool Box Talk with other employees covering all shifts

YES

Stop Job where accident / incident has happened

1. Quarantine the Equipment/ Area
2. Initiate 8D PPS led by Manager and his Team
3. Investigate by gathering initial informations like - WHO? WHAT? WHEN? WHERE? WHY? HOW? of the Accident

Resume Production only when Manager is ensured on immediate containment action (D3) to eliminate chance of recurrence

1. HSE Data Base upload within 24 hrs with all relevant informations gathered on Accident/ Incident.
2. Share information in TBT with other employees to create an awareness of the Accident/ Incident

Detailed investigation continues to find out the root causes of the Accident/ Incident (D4). Define counter measures after analysing the root causes (D5).

Execute and track progress of each action point recommended in D5 within 07days

1. Check Results , Standardize and establish control to avoid/ eliminate repeat Incident/ Accident
2. Close 8D PPS (60days for Accidents and 90 days for incidents
3. Create Lesson Learnt Sheet for horizontal deployment.
4. Share LLS in TBT with other employees.

1. Transfer injured person to nearest Hospital for effective treatment.
2. Inform injured person's immediate kin/ family

1. seek a second opinion from Company's Medical Officer before declaring LTI / RWC.
2. In case of LTI, extend full support for effective treatment and quick recovery.
3. In case of RWC / Job restriction, take full consent of attending medical doctor and IP and if both agree, allot a suitable lighter job as per doctor's advise. Extend commuting facility from home to factory & back.

Emergency Telephone No of HSCL Official:

1. Mr. Swapan Chakraborty - 9674165886
2. Mr. Atanu Nandy - 8100066225
3. Mr. Saudip Mukherjee - 9433933405
4. Mr. Ajoy kr. Acharjya - 9088220913
5. Mr. Nandan Mahapatra - 9831944575
6. Mr. Bilash Butta (OHC) - 9051822407
7. Shift in-Charge (CBD) - 9674160014
8. Shift in-Charge (CPP) - 9674160003
9. Shift in-Charge (CTP) - 9874804043
10. Shift in-Charge (By-Product) - 8017041011
11. Shift in-Charge (SNF) - 8981089638

Hospital Telephone No:

1. Singur Rural Hospital - (033) 2630 0383
2. Arunodaya Healthcare Private Limited - (032)1224 4567
3. Occupational Health Centre (OHC) - 211 (Intercom)

Fire Brigade Telephone No:

- Champdani Fire Station - (033) 2632 1100
 Sreerampur Fire Station - (033) 2662 8010
 Chandannagar Fire Station - (033) 2683 6054

Police Station Telephone No:

1. Singur - (033) 2630 1001
2. Haripal - (032)1224 2268