

Manual Section 2	Issue Date 07/22/17	Revision Date 01/01/24	Policy Number LLCP-017
	Incident Management		

Purpose

The Incident Management Policy provides the Company with a means to ensure that our employees report and/or investigate all incidents in which they are involved -- accidents, property damage, near misses, fires, spills, etc. -- while working at the Company's offices, shops and field locations, and while visiting or working at all Customers' field locations.

Scope

All LLC Companies including, Blanchard Industrial, LLC, GIS Engineering, LLC, Grand Isle Shipyard, Inc., and GWIS, Mack Steel, NuWave, Sun Industries, Valvemax, Discovery Industries, Inc.; hereafter identified as "Company".

Policy

It is Company policy to ensure that our employees report all incidents in which they are involved *immediately* to their Supervisors who are trained in First Aid & CPR as well as all incident protocols. Supervisors are to document all incidents and report them immediately to the company hotline. Following contact with the Corporate HSE on-call personnel, the Supervisor shall forward all incident reports to the Corporate HSE Department via the incident email (incident@gisy.com).

Corporate HSE will delegate an investigation team as deemed necessary by each individual incident. All team members shall be trained in their responsibilities and in proper incident investigation techniques as needed.

Pre-Accident Procedures

Prior to starting a job at a new location, the Project Manager or Supervisor shall contact Corporate HSE and render their new job site location. This is done so that Corporate HSE has the ability to locate Emergency Medical Treatment Facilities that may be needed if a Life Threatening Emergency occurs.

The Pre-Accident Procedure has not been developed to negate our existing Incident Management Flow Chart, but to enhance decisions that will be made by our Corporate HSE Director as well as the Company Medical Director.

Post-Accident Procedures

If a Company employee is involved in an incident, immediate notification shall be made to Corporate HSE via the Company hotline. The Company Medical Director can then evaluate the circumstance of the injured employee and ensure that prompt medical care is given. The nature of the incident and the extent of the employees injuries, will determine how the Company ensures the proper level of care is given.

If an injury is suspected to have the possibility of being "Life Threatening or Disabling" the company hotline shall be contacted and the injured employee will be transported by the quickest means necessary to the nearest medical facility that is capable of handling such an incident. If the injury is deemed "Non-Life Threatening", the Company requires as per this policy and Acknowledgement that the company hotline is contacted for further instructions.

The Company uses its own *Incident Management Reporting Form* for documenting its incidents (LLCF-001); **All incidents are reported immediately** to the respective Supervisor and then to the corporate HSE department via the hotline and incident email.

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GIS completes and submits to OSHA the U. S. Department of Labor's *Employer's First Report of Injury* form for OSHA recordables, however all other records are kept in our electronic database.

The company reports to all Government Agencies as required. The company will also maintain and post incident data as required by all specific Government Agencies. This will be done by the Corporate HSE department.

GIS will record Incidents within seven calendar days of receiving information that the injury occurred on proper OSHA 300 Log. At the year end, information will be captured on the OSHA 300A form and signed by a company official. Once signed, the form shall be posted in a conspicuous area between the days of February 1st through April 30th. All records will be maintained for a minimum of 5 years.

Corporate HSE will verbally report all required incidents to OSHA within 8 hours and to the client within 24 hours of discovery.

Clients require all incidents to be reported including, but not limited to, injuries, spills, property damage, fires, explosions, and vehicle damage.

1. When an incident occurs, follow the Company Incident Management Flow Chart.
2. Information from the Incident must be gathered and submitted in as soon as possible.
3. All incidents shall be reported to the required government agencies, as well as the customer, as deemed by their requirements. This will be handled by the Corporate HSE department.

Note: Forms are available on the Safety Portal and may also be obtained by contacting the Corporate HSE Department via the hotline (1-855-543-5163).

Initiating an Investigation

When notified of the incident, the Corporate HSE Director will determine if an investigation is warranted based on the severity and preliminary information provided. If it is decided to perform an investigation, further instruction will follow as well as requests for additional information. All investigations must be performed by Company personnel knowledgeable in the Company policies and procedures and investigation techniques. If the incident involves a Company employee at a Customer location, the HSE Director will communicate with the Customer representative to ensure that a proper investigation takes place if needed.

For further information regarding Company Incident Investigations, see the Incident Management Investigation Process which contains guidance to the incident investigation process including:

- The Company Incident Investigation Process
- Interview Questions
- Potential Causes
- RCA