COMMUNICATION OF ENVIRONMENT, HEALTH, SAFETY (EHS) AND RISK MANAGEMENT INCIDENTS

Ansell is committed to ensuring that:

- All incidents (near-misses and accidents) that occur on an Ansell property or where work-relationship can be established on external premises, are appropriately responded to, investigated and documented regardless of whether someone has been injured or not; and
- All serious incidents are immediately reported internally and, where required, to the appropriate Authorities.

In all such cases, appropriate corrective and preventative actions must be established and implemented.

PURPOSE:

The purpose of incident reporting within Ansell is to ensure that senior management is quickly informed of any serious incident or events, beyond LTIs that are currently required to be reported per Ansell’s 5-Point Safety Charter.

It is particularly important that senior management is made aware of events having the potential for media and / or regulatory attention.

DEFINITIONS:

Serious Incidents / Events

The following are considered to be “serious” in the work environment –

- Work-related injury / illness resulting in:
  - Death;
  - Loss of a limb, or part thereof;
  - 2nd or 3rd degree burns to a person;
  - The placing of a person on a life-support system;
  - Immediate treatment as an in-patient in a hospital; or
- Any event or circumstance listed below that presents an immediate threat to life:
  - The loss of consciousness of a person caused by impact of physical force, exposure to hazardous substances, electric shock or lack of oxygen;
  - Major damage to any plant, equipment, building or structure
  - An uncontrolled fire or explosion;
  - An uncontrolled escape of gas, dangerous goods or steam / hot water;
  - Imminent risk of fire or explosion;
  - Imminent risk of an escape of gas, dangerous goods or steam / hot water;
  - A spill or incident resulting in exposure or potential exposure of a person to a notifiable or prohibited carcinogenic substance;
  - Entrapment of a person in a confined space;
  - Collapse of an excavation;
  - Entrapment of a person in machinery.
• Property:
  - Damage to 3rd party or company property greater than US$5000.
  - Any fire that results in a loss of > US$1000;

• Environment:
  - Reportable (per local or country standards) releases, such as a chemical spill or atmospheric emission, with potential to cause soil, groundwater or airborne contamination.

• Security:
  - Any threat to company personnel or property where external security or police are involved.

• Other:
  - Any suspicious or malicious product tampering.
  - Any event likely to attract adverse community, media or regulatory attention (e.g. criminal prosecution, withdrawal of manufacturing license or approval, etc)
  - Any fine / citation (of any amount) or official notices issued, including Improvement Notices, Incident / Dangerous Occurrence Notification.

- IF YOU ARE UNSURE, NOTIFY, COMMUNICATE, ESCALATE. IT’LL NEVER BE OVER-COMMUNICATED !

GENERAL EXPECTATIONS:

Plant Managers are expected to ensure that:

• Any safe, practical actions are immediately taken to eliminate or isolate the hazard/s associated with an incident;

  The respective Regional Snr. Manager for EHS / RM or the Regional Director for EHS / RM, must be notified of all serious incidents immediately, so that further notification / escalation to Senior Management (Head EHS / RM, VP Ops and SVP Global Ops) can be facilitated. This initial notification can be via phone and / or brief email.

• All incidents that occur at Ansell properties that they have been engaged to manage are appropriately investigated and documented regardless of whether an injury has occurred.

• Where required, appropriate authorities are notified of all incidents.

In the cases where a serious incident has occurred, Managers are also expected to ensure the area in which the incident occurred is not disturbed by ensuring:

• Plant or equipment involved in the incident is not used, moved or interfered with; and
• Action is taken to isolate the incident area, and the surrounding areas within 5 m of the incident, so these are not disturbed.

Neither of the above should be enforced if they prevent actions required to:

• Help or remove a trapped or injured person or to remove a body;
• Avoid injury to a person or damage to property; or
• Assist police or regulatory inspector investigations.

In the case of an Office or Warehouse, the senior manager in charge of the facility should immediately inform his / her one-over manager, who will then ensure that the incident is not only communicated to senior management, but also to the respective Regional Snr Manager for EHS / RM or the Regional Director for EHS / RM.

REQUIRED DOCUMENTATION:

Plant / Office / Warehouse Managers are also required to prepare and forward the following supporting documentation if requested:

• Photos (using OneDrive for Business) or links to any CCTV footage of the incident (if applicable); and
• Any further anecdotal or factual evidence of the incident (i.e. SWPs, JSA’s, log book entry, cleaner’s logs, photographs, slip test documentation, lighting levels, consultant documentation etc.).

If this documentation is forwarded by email, the Subject Line of the email should make it explicitly clear that the contents of the email are pertaining to the already reported incident.

THE INVESTIGATION PROCESS:

The investigation into any incident must involve the following steps.

After the injured has / have been taken care of, the situation has been brought under control and the initial notification of the incident has been done:

• Visit the incident location
  - Take control at scene.
  - Identify sources of evidence and preserve them from alteration or removal by cordonning off the area
  - Estimate the loss potential
  - Where there are insurance implications, the Global Insurance Manager, must be notified.

• Gather information
  - Understand the ‘big’ picture first and interview victim(s) and witnesses separately
  - Take photographs
  - Document all critical information

• Analyze and evaluate all significant causes
  - Review CCTV footage, if available
  - Drill down to find root causes

• Develop and take remedial actions
  - Take temporary or short-term actions
  - Schedule and implement lasting corrective actions applying the hierarchy of controls

• Review findings and recommendations
  - Complete the investigation report
- Develop the Lessons Learnt Report for distribution, in consultation with the Regional Snr. Manager EHS / RM or the Regional Director EHS / RM,
- Coach for improvement

- Follow through
  - Conduct review meetings to monitor timely implementation of remedial / preventive actions
  - Analyze data for trends and conclude on effectiveness of corrective actions.