

## INCIDENT MANAGEMENT

### 1. PURPOSE

1.1. The purpose of this document is to outline incident and work injury management procedures for environment, health and safety at Ansell.

### 2. SCOPE

2.1. This procedure is applicable to all sites and activities under the management control of Ansell.

### 3. REFERENCES

OSHA 29 CFR 1904 Recording and Reporting Occupational Injuries and Illness  
Code 06: Working Hours

### 4. DEFINITIONS

#### Accident

An unplanned event that results in personal injury or property damage.

#### Dangerous Occurrence

Dangerous occurrences are usually defined by local authorities. Where occurrences are not defined locally, the following list shall apply. Where occurrences defined locally, do not include the occurrences listed below, they shall be included for internal Ansell reporting and communication purposes, in addition to the local definitions.

- Major damage to any plant, equipment, building or structure
- An uncontrolled\* fire or explosion;
- An uncontrolled\* escape of hazardous substance or steam / hot water;
- Imminent risk of fire or explosion;
- Imminent risk of an escape of hazardous substance 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

\* "Uncontrolled" means that existing preventive and/or mitigative control measures at site had failed.

#### First Aid

Treatments that are listed as follows. All other treatments will then follow the Medical Treatment definition.

- i. Using a non-prescription medication at nonprescription strength (for medications available in both prescription and non-prescription form, a recommendation by a

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- physician or other licensed health care professional to use a non-prescription medication at prescription strength is considered medical treatment for recordkeeping purposes);
- ii. Administering tetanus immunizations (other immunizations, such as Hepatitis B vaccine or rabies vaccine, are considered medical treatment);
  - iii. Cleaning, flushing or soaking wounds on the surface of the skin;
  - iv. 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);
  - v. Using hot or cold therapy;
  - vi. 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);
  - vii. Using temporary immobilization devices while transporting an accident victim (e.g., splints, slings, neck collars, back boards, etc.);
  - viii. Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister;
  - ix. Using eye patches;
  - x. Removing foreign bodies from the eye using only irrigation or a cotton swab;
  - xi. Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means;
  - xii. Using finger guards;
  - xiii. Using massages (physical therapy or chiropractic treatment are considered medical treatment for recordkeeping purposes); or
  - xiv. Drinking fluids for relief of heat stress.

**High Risk First Aid**

An incident leading to first aid treatment which under different circumstances has potential to lead to MTI or LTI.

**High Risk Near Misses**

A near miss under different circumstances which has potential to lead to MTI or LTI.

**Incident**

An event that has or potentially will cause harm to human, environmental damage and/or property damage, or

An event that has or potentially will impact employee safety, health and wellness, due to breach of local requirements, subscribed standards and legal requirements.

**Imminent**

Any conditions or practices in any workplace which are such, that a danger exists which could reasonably be expected to cause death or serious physical harm immediately or before the advent of such danger can be eliminated through normal procedures.

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**Loss of Containment**

Spills, leaks or releases of materials from primary containment.

Primary containment can be for example; tanks, tankers, drums, pails, plastic containers and bags. Loss of containment can be due to for example, poor fitting, valves passing, holes, structural failures and spills during manual handling and transfer of material.

**Lost Time Injury (LTI)**

A work-related injury or illness that results in the employee being away from work for one or more calendar days.

The count of days starts on the day after the incident and is recorded up to a maximum 180 days or when employee leaves/ retires from the company.

The count of days is calendar days and includes weekends, public holidays off days and rest days.

**Medical Treatment Injury (MTI)**

Injury requiring the management and care of a patient to combat disease or disorder. **This excludes** the following,

- i. Visits to a physician or other licensed health care professional solely for observation or counseling
- ii. Diagnostic procedures, such as x-rays and blood tests, including the administration of prescription medications used solely for diagnostic purposes (e.g., eye drops to dilate pupils); or
- iii. First aid treatment

**Near Misses**

An incident in which there is no environmental damage, no personal injury and no property was damaged, but where, given a slight shift in time or position, damage or injury easily could have occurred.

**Occupational Illness**

Any bodily abnormal condition or disorder resulting from a non-instantaneous event or non-instantaneous exposure in the work environment. Occupational illness can be acute or chronic.

**Reoccurrence/Aggravation Injuries**

Re-occurrence/ Aggravation can occur as a result of exposure to the work environment after employees return to work after receiving treatment. This can happen after employee has full recovery or while still undergoing treatment/ recovery. Classification of Re-occurrence/ Aggravation shall be reviewed with Global EHS and updated accordingly.

**Unsafe Act**

Action by an individual or group of persons that potentially will cause injury to human, environmental damage and/or property damage.

### Unsafe Conditions

Condition of the work environment that potentially will cause injury to human, environmental damage and/or property damage.

### Work Environment

The establishment and other locations where one or more employees are working or are present as a condition of their employment. The work environment includes not only physical locations, but also the equipment or materials used by the employee during the course of his or her work.

### Work Injury

Any work-related injury, illness or disability to an employee which:

- a) Requires first aid or medical treatment,
- b) Requires reallocation of duties, or
- c) Is a lost time injury.

### Work-related

An event or exposure in the work environment either caused by or contributing to the resulting condition or significantly aggravated a pre-existing injury or illness. **Exceptions are as follows.**

- i. At the time of the injury or illness, the employee was present in the work environment as a member of the general public rather than as an employee.
- ii. The injury or illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs outside the work environment.
- iii. The injury or illness results solely from voluntary participation in a wellness program or in a medical, fitness, or recreational activity such as blood donation, physical examination, flu shot, exercise class, sporting activities.
- iv. The injury or illness is solely the result of an employee eating, drinking, or preparing food or drink for personal consumption (whether bought on the employer's premises or brought in). *For example, if the employee is injured by choking on a sandwich while in the employer's establishment, the case would not be considered work-related.*

*Note: If the employee is made ill by ingesting food contaminated by workplace contaminants (such as lead), or gets food poisoning from food supplied by the employer, the case would be considered work-related.*

- v. The injury or illness is solely the result of an employee doing personal tasks (unrelated to their employment) at the establishment outside of the employee's assigned working hours.
- vi. The injury or illness is solely the result of personal grooming, self medication for a non-work-related condition, or is intentionally self-inflicted.
- vii. The injury or illness is caused by a motor vehicle accident and occurs on a company parking lot or company access road while the employee is commuting to or from work.
- viii. The illness is the common cold or flu (Note: contagious diseases such as tuberculosis, brucellosis, hepatitis A, COVID-19 or plague are considered work-related if the employee is infected at work).

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- ix. The illness is a mental illness. Mental illness will not be considered work-related unless the employee voluntarily provides the employer with an opinion from a physician or other licensed health care professional with appropriate training and experience (psychiatrist, psychologist, psychiatric nurse practitioner, etc.) stating that the employee has a mental illness that is work-related.

## 5. ROLES & RESPONSIBILITIES

### 5.1. Site Lead

- 5.1.1. Ensure ALL incidents are reported and investigated as per Ansell procedures and standards
- 5.1.2. Provide adequate resources to ensure this standard is implemented and meet its intended objective.

### 5.2. Site EHS

- 5.2.1. Coordinate and ensure ALL reporting requirements (except working hours) stated in this standard are met.
- 5.2.2. Assist the investigation team as advisor/ moderator.
- 5.2.3. Manage and maintain incident management documents and records.
- 5.2.4. Monitor, analyse incident data and trends and drive improvement initiatives to reduce incident rates.

### 5.3. Site HR

- 5.3.1. Coordinate and ensure ALL reporting requirements relating to working hours, stated in this standard are met.
- 5.3.2. Assist the investigation team as advisor/ moderator.
- 5.3.3. Manage and maintain incident management documents and records for working hours incidents.
- 5.3.4. Monitor, analyse incident data and trends and drive improvement initiatives to reduce incident rates related to working hours.

### 5.4. Department Leads/ Managers

- 5.4.1. Accountable for incident management in their work area/ department.
- 5.4.2. Lead Incident Investigations in their work area/ department.
- 5.4.3. Lead improvement initiatives to reduce incident rates.

### 5.5. All Employees

- 5.5.1. Report incidents as per Ansell's procedures and standards.
- 5.5.2. Participate in incident investigation and improvement initiatives to reduce incident rates.

## 6. PROCEDURES

### 6.1. Incident Severity Levels for Ansell Incidents notifiable through Smartsheet

6.1.1. See Attachment 2 for Working Hours Severity

#### 6.1.2. Severity Level 1 – Has potential to escalate to MTI/ LTI

- a) High Risk First Aid
- b) High Risk Near Miss

#### 6.1.3. Severity Level 2

- a) MTI
- b) Minor Environmental Incident – No citations/ official notices/ fines, *and/ or* contained within the site.
- c) Property Damages < USD 5000.00 or any fire that results in a loss of < USD 1000.00 (includes third party property)
- d) Motor vehicle incident with damages <USD 2500.00. (includes damages to third party)
- e) Confirmed communicable disease

#### 6.1.4. Severity Level 3

- a) LTI
- b) Major Environmental Incident – Reportable incidents, *and/ or* not contained within the site, *and/ or* subject to citations/ official notices/ fines.
- c) Major Property Damages ≥ USD 5000.00 or any fire that results in a loss of ≥ USD 1000.00 (includes third party property)
- d) Motor vehicle incident damages ≥USD 2500.00. (includes damages to third party)

#### 6.1.5. Severity Level 4

- a) Serious Bodily Injury or Fatality
- b) Serious Environmental Incident – Incidents affecting the public and the community or incidents affecting international waters/ land/ air space.
- c) Loss of site or parts of site causing site shutdown
- d) Motor vehicle incident with total loss of vehicle. (includes damages to third party)
- e) Occupational Illness\*
- f) Dangerous Occurrence

\*Only to be reported after confirmed investigation and report from Occupational Health Doctor.

### 6.2. First response

6.2.1. This section is not applicable to working hours incidents. See Attachment 2.

6.2.2. Where necessary, upon occurrence of an incident, mitigation and containment measures shall be taken immediately. The measures include but not limited to the following

- a) Providing First Aid
- b) Containment of spill
- c) Barricading areas
- d) Contacting Emergency Responses
- e) Collection of evidence
- f) Removal of unsafe conditions and stoppage of unsafe acts

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- 6.2.3. Exercise containment and mitigation measures only IF IT IS SAFE TO DO SO. Contact Emergency Response Team/ Immediate Line Manager/ EHS Manager otherwise.
- 6.2.4. Site shall have a documented plan for injury management. This will include but not limited to methods of transporting victims to clinics/ hospitals, who should accompany victims, list of clinics and hospitals, preferred occupational health doctors, assistance in recovery if required.
- 6.2.5. In countries where Good Samaritan Law is not gazetted, procedures MUST be in place to ensure victims receive immediate medical attention and the duty of care is exercised whilst legally protecting the person(s) providing assistance.

### 6.3. Reporting and Communication

- 6.3.1. Incidents shall be reported and communicated according to the following.
- 6.3.2. All incidents categorized in section 6.3 shall be reported and communicated internally in Ansell, immaterial whether the incident involves employees, contractors, visitors or any other third party. This is to ensure incidents are investigated and appropriate actions are taken to close the gaps.
- 6.3.3. Incident classification may be reviewed upon obtaining new information or upon review from Global EHS. Where these reviews take place, the relevant procedures related to the classification shall apply. Incident classification shall be verified prior to publication of Lessons Learnt and updated in ALL relevant records. **Awaiting incident classification shall not be impede the reporting timelines below. Report with the current knowledge and the classification shall be changed with new information if required.**
- 6.3.4. There are four levels of reporting as follows for incidents notifiable through Smartsheet.
  - a) **Incidents below Severity Level 1**
    - i. Employees shall notify to the Site EHS Lead in a timely manner or at frequencies/ methods prescribed by the site.
  - b) **Severity Level 1 and Severity Level 2**
    - i. Employees shall notify immediately to the Site EHS Lead and Site Manager.
    - ii. Site EHS Lead report using the Incident Notification Form in Smartsheet within 24 hours.
  - c) **Severity Level 3**
    - i. Employees shall notify immediately to the Site EHS Lead and Site Lead.
    - ii. Site EHS shall report using the Incident Notification Form in Smartsheet within 24 hours.
  - d) **Severity Level 4**
    - i. Employees shall notify immediately to the Site EHS Lead and Site Lead.
    - ii. Site EHS shall report using the Incident Notification Form in Smartsheet within 8 hours.
- 6.3.5. In addition, the following are incidents that **are notifiable through e-mail**.
  - a) Employees are required to notify these incidents to either the Site EHS and/ or Department Head.

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- b) Site EHS or department head shall notify immediately of coming into knowledge of the incident, to the Site Lead.
  - c) Site Lead shall notify these incidents through the Incident SEV4 e-mail within 8 hours.
    - i. Security - Any threat to company personnel or property where external security or police are involved.
    - ii. Any suspicious or malicious product tampering.
    - iii. Any event likely to attract adverse community, media or regulatory attention (e.g. criminal prosecution, withdrawal of manufacturing license or approval, etc)
    - iv. Any citation/ official notices issued/ fines, including improvement notices
  - d) Non-work related Covid-19 related fatalities shall be reported through established HR procedures.
- 6.3.6. Working Hours Incident Reporting
- a) Working hours incidents shall be reported to Site HR immediately upon coming into knowledge of the occurrence of the incident.
  - b) Site HR shall take necessary actions as outlined in Attachment 2 and any other further action and escalations as required.
- 6.3.7. Work Injury Reporting
- a) A Work Injury Report shall be submitted to Global EHS via the Work Injury Reporting Form on a monthly basis by the third working day of the month.
  - b) The Work Injury report shall contain the following.
    - i. Headcount as at the last day of the month
    - ii. MEDICAL TREATMENT (MTI)/OSHA RECORDABLE CASES
    - iii. LOST TIME INJURY (LTI) – employee only
    - iv. DAYS LOST  
The number of complete calendar days away from work after the date of injury due to work-related injury or illness. Weekend days, holidays, vacation days or other days off are included in the total number of days recorded. Day count will stop when the injury/illness has reached a “cap” of 180 days lost. Further points to note:  
Days for which compensation liability is disputed should be included and adjusted if “appeal” upheld.  
Fatalities attract a “penalty” of 180 days against the month the event occurred.
    - v. DAYS ON MODIFIED DUTIES  
The number of calendar days after the date of injury on which employees attend work, but do not perform their full routine duties due to work-related injury or illness upon a health practitioners’ advice. Day count will stop when the injury/illness has reached a “cap” of 180 days of modified duties.



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Routine duties are defined as work activities the employee regularly performs at least once per week.

“Regular” overtime days should be counted.

- vi. NEAR MISS INCIDENTS
- vii. CONTRACTOR LOST TIME INJURIES

Any contractor, while assigned to a job on Company premises, that loses a scheduled workday after the date of injury. This is the only category in which third party contractors are counted.

#### 6.4. Incident Investigation

6.4.1. Investigation for working hours incidents shall be conducted using appropriate tools to nature of the incident and the following sections are exempted.

**6.4.2. Incidents of Severity Level 2 and above shall be investigated using the Incident Reporting and Investigation Form. (ICAM)**

This clause is exempted for offices and delivery teams. Offices and delivery teams shall use **Simplified Incident Reporting and Investigation Form**

6.4.3. Incidents at Severity Level 1 shall be investigated using 5 Why Analysis or Fishbone Method.

6.4.4. Incidents below Severity Level 1 shall be investigated using simpler investigation methods as deemed fit by the site.

6.4.5. Other Incidents not classified under Severity Levels shall be investigated using appropriate and/or prescribed methods.

6.4.6. Near Misses, Unsafe Acts and Unsafe Conditions are leading indicators which shall be analysed and intervention programs shall be set-up as appropriate to prevent injury and illnesses. This shall be recorded into the SmartSheet on a monthly basis. Site shall use the **Ansell Leading Indicator Form** to collect data.

**6.4.7. Hazard Alert**

- a) The objective of the Hazard Alert is to communicate and alert other sites within Ansell on the incident; whereby the other sites could review the possibility of a similar incident at their sites and take necessary preventive measures.
- b) Shall be filled up by site and submitted to the Global EHS within 48 hours.
- c) Global EHS shall review the Hazard Alert and communicate it to the identified recipients via Microsoft Teams.

**6.4.8. Complete Incident Investigation Report**

- a) Upon completion of investigation, the report shall be reviewed as follows.
  - i. Severity 2 – Relevant Functional Lead/ OLT, Global EHS Lead and person leading Global EHS Standard function.
  - ii. Severity 3 and 4 – ELT Representative, Relevant Functional Lead/ OLT, Global EHS Lead and person leading Global EHS Standard function.
- b) The completed Incident Reporting and Investigation Form shall be submitted to Global EHS within 14 days\*.
- c) Global EHS shall review and communicate the report to relevant parties.
- d) This shall be kept on file with Global EHS.

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*\*Site may request, with justification, the extension of 14 days to maximum of 21 days, through the Global EHS.*

**6.4.9. Lesson Learnt**

- a) A Lesson Learnt is the complete report of the investigation that will be published for sharing throughout Ansell. It has identified root causes, corrective actions and further deliberation actions as well as key lessons learnt from the incident.
- b) Upon receipt of the completed Incident Reporting and Investigation Form, Global EHS shall publish the Lessons Learnt to Relevant Functional Lead/ OLT, Global EHS and all sites for sharing. See 6.5.3

**6.5. Learnings**

6.5.1. Sharing of working hours incident learnings shall be done by the human resources function as deemed required.

**6.5.2. Hazard Alert**

- a) Upon receipt of the Hazard Alert, sites shall ensure communication to relevant parties is done within 5 days. This communication shall be kept in record.
- b) Site EHS shall do a review of applicability and where the risk is the same or higher, ensure additional control measures are put in place where the same hazard exists. This review shall be kept in record.

**6.5.3. Lessons Learnt**

- a) Upon receipt of Lessons Learnt, site shall review applicability of the actions within 5 days.
- b) Action plan for implementation shall be developed with responsibilities and timeline assigned.
- c) The action plan shall be reviewed on a monthly basis for tracking of progress and closure. The progress of actions shall be updated in the Smartsheet.
- d) Upon closure of action, Site EHS shall review within 30 days the effectiveness of the action. If actions are found ineffective, a new action shall be assigned.
- e) Site may assign additional actions where necessary and share this as a potential best practice to be shared Ansell wide. (to be shared with Global EHS)

**6.6. Exemptions/ Exceptions**

6.6.1. Where local legislations conflicts with Ansell Standard (EHS-COP-007), reporting to local authorities shall be done according to the local requirements and internal reporting shall follow Ansell Standard.

6.6.2. All days mentioned in this standard are calendar days unless otherwise specified.

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### 7. Attachments and Forms

EHS-COP-007-F001 Incident Reporting and Investigation Form

EHS-COP-007-F002 Simplified Incident Reporting Form

EHS-COP-007-F003 Ansell Leading Indicator Analysis Form

Attachment 1 Incident Management Process Flow

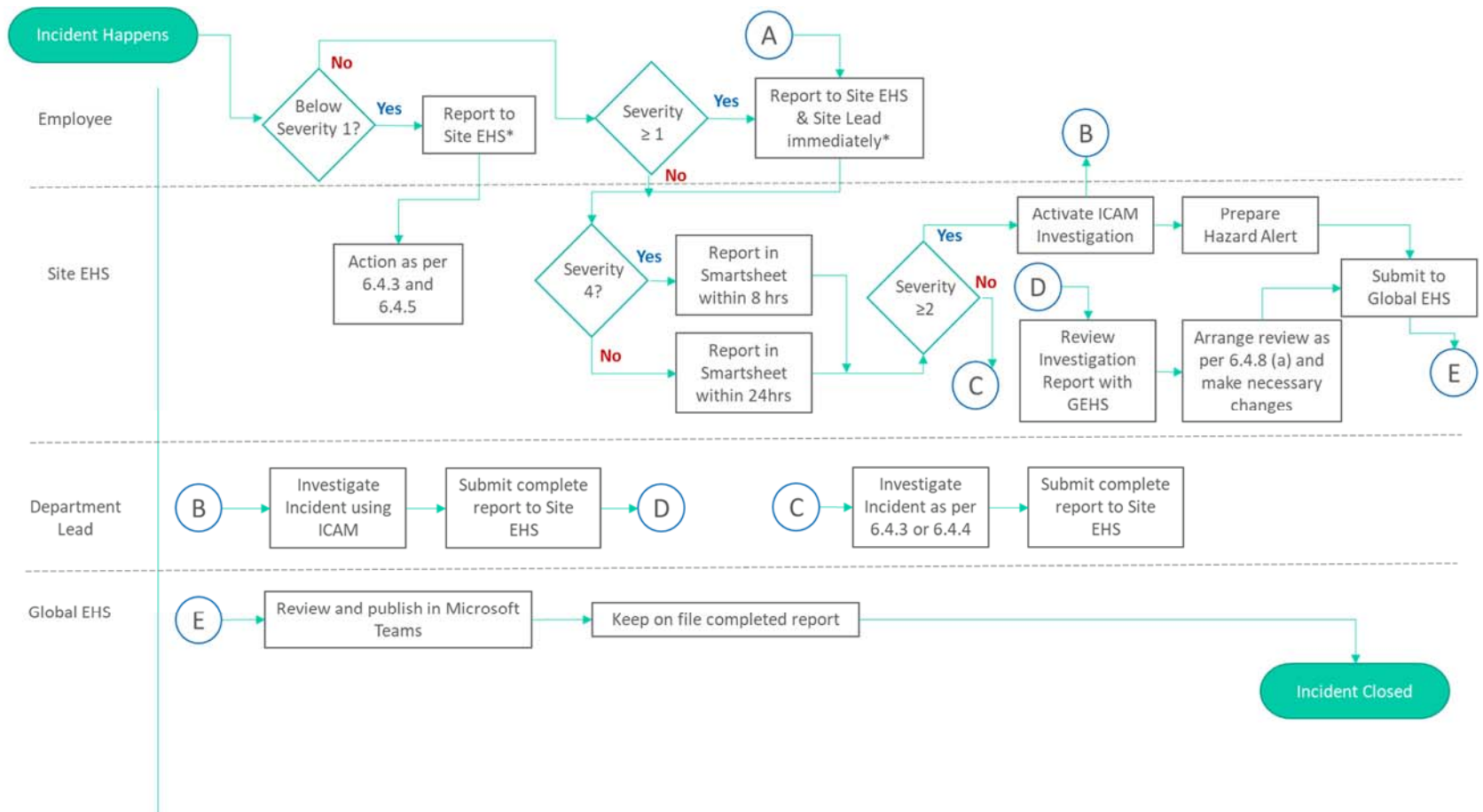
Attachment 2 Reporting Contact Information

Attachment 3 Working Hours Incident Management

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**ATTACHMENT 1: Incident Management Process Flow**

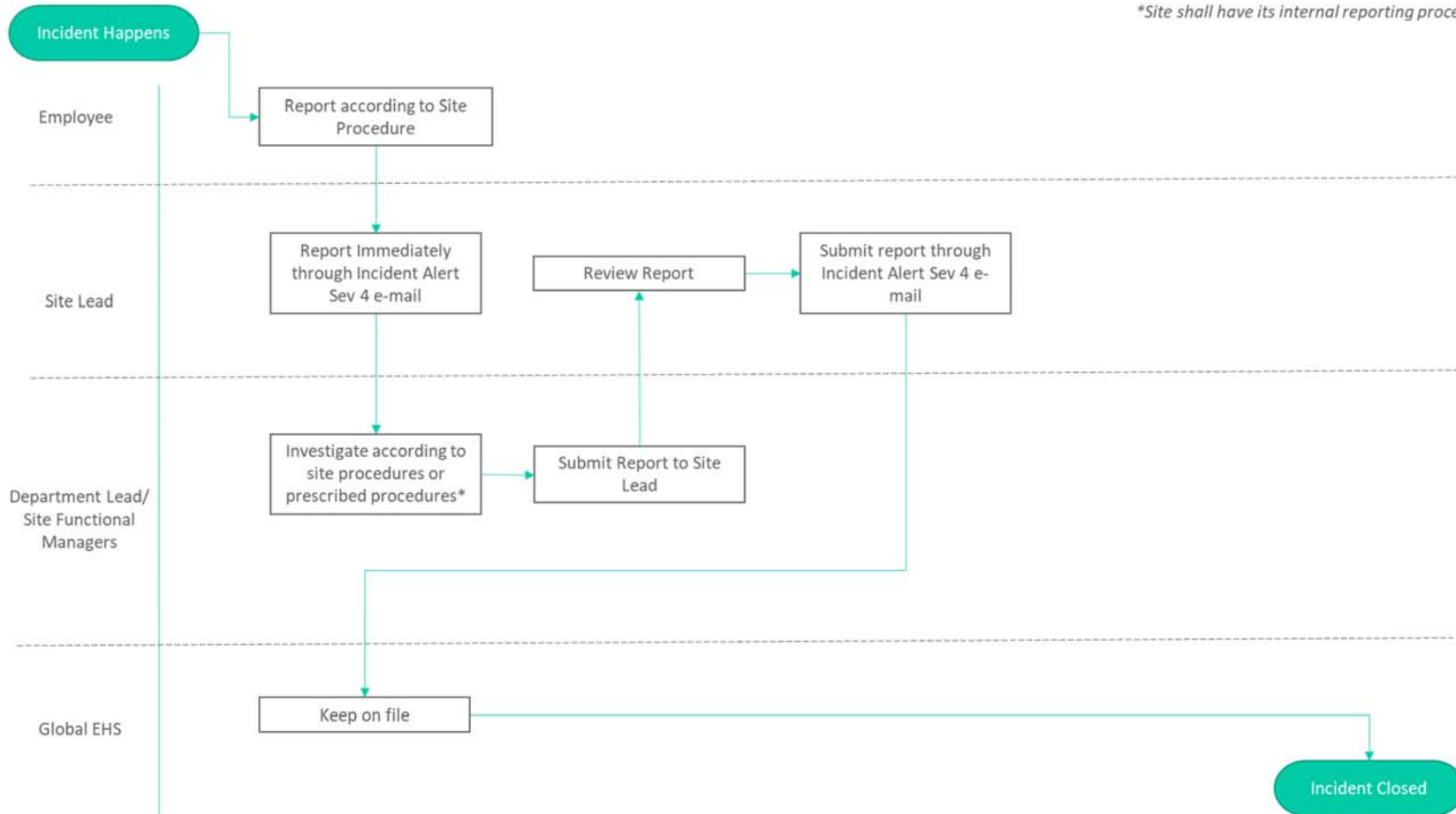
Incident with Severity Levels (except working hours incidents)



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Incident without Severity Levels (except working hours incidents)

*\*Site shall have its internal reporting process*





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**ATTACHMENT 2: Reporting Contact Information**

Alert Type	e-mail Group	Recipients
Below Severity 1	N/A	Determined by site
Severity 1	Incident Alert Sev1	Site GM's, Global EHS Team, Global Insurance & Risk Mgr, OLT
Severity 2	Incident Alert Sev2	Site GM's, Global EHS Team, Global Insurance & Risk Mgr, OLT
Severity 3	Incident Alert Sev3	Site GM's, Global EHS Team, Global Insurance & Risk Mgr, SVP, OLT/VP, ELT
Severity 4	Incident Alert Sev4	Site GM's, Global EHS Team, Global Insurance & Risk Mgr, SVP, OLT/VP, ELT, CEO, Head of Legal, Corporate Communication

**ATTACHMENT 3: Working Hours Incident Management****REFERENCE****Code: 06**

6.1 Working hours must comply with national laws, collective agreements, and the provision of 6.2–6.6 below, whichever affords the greater protection for workers. Sub clauses 6.2 – 6.6 are based on International Labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract and shall not exceed 48 hours per week\*.

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all of the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of regular rate of pay.

6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where all of the following criteria are met:

- This is allowed by national law.
- This is allowed by collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce.
- Appropriate safeguards are taken to protect the worker's health and safety; and
- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

**Definition of the Violation to Working Hours [Non-Compliance]**

- This table explains;
  - The area identified as Non-Compliance to the Code, and
  - The Significance of the Issue [Severity] or Non-Compliance,
  - Corrective and Preventive Action Time Period, and
  - The Audit Verification Method.

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Definition of significance of Issue [Non-compliance] and Mapping of Significance of Issue to the Severity Level of EHS Incident Reporting

Significance of Issue (N-C)	Definition of Significance of Issue [Finding or Non-Compliance]	Mapped to EHS Incident Reporting Severity Level
Minor non-compliance	<ul style="list-style-type: none"> <li>An occasional or isolated problem</li> <li>An issue which represents low risk to workers / those on site</li> <li>A policy issue or misunderstanding where there is no evidence of a material breach.</li> </ul>	Severity 1
Major non-compliance	<ul style="list-style-type: none"> <li>Material breach of a code item or local law which represents a danger to workers / those on site</li> <li>Or any breach which constitutes an infringement of workers' human rights.</li> <li>Or a <u>minor non-compliance</u> that has not been addressed over time, or for which no significant improvement has been made.</li> </ul>	Severity 2
Critical non-compliance	<ul style="list-style-type: none"> <li>A severe breach which represents a danger to workers / those on site, or which constitutes a severe breach of workers' human rights.</li> <li>A severe material breach of a code requirement / law. A systematic and deliberate breaking of a code requirement / law.</li> <li>An attempt to pervert the course of the audit through fraud, coercion, deception,</li> <li>Or a <u>major non-compliance</u> that has not been addressed over time, or for which no significant improvement has been made.</li> </ul>	Severity 3
Business Critical non-compliance	<ul style="list-style-type: none"> <li>A critical breach of a code item or local law resulting in an issue which presents a critical or imminent risk to worker's safety / critical risk to life and limb or which constitutes a critical breach of workers' human rights. This may put either new business or ongoing business at risk and is therefore likely to require immediate correction or improvement.</li> <li>Or a critical non-compliance that has not been addressed over time. This is likely to require immediate action and may put business relationships at risk.</li> </ul>	Severity 4



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Issue / Non-Compliance	Impact to the Business and Verification Plan			EHS Incident Reporting Guide
	Significance of Issue	Completion Timescale	Verification Method	Severity Level
1) Falsified, duplicate or intentionally incomplete working hour / time record including verified Inconsistencies.	Critical	60 days	Follow-Up	Severity 3
2) Systemic working hours / time record missing or incomplete	Critical	60 days	Follow-Up	Severity 3
3) Working hours / time record are not monitored by site	Critical	60 days	Follow-Up	Severity 3
4) No time records available at the audit resulting in working hours could not be verified	Critical	30 days	Follow-Up	Severity 3
5) Working hour records missing for some employees e.g. agency or temporary workers	Major	60 days	Follow-Up	Severity 2
6) Contracted working hours (excluding overtime) regularly exceed 48 per week.	Major	90 days	Follow-Up	Severity 2
7) standard / contracted hours is not defined by contract / employment agreement	Minor	30 days	Desktop	Severity 1
8) Improper use of other types of contracts e.g. zero hours contracts / variable hour contracts / part-time contracts to avoid regular employment.	Major	30 days	Desktop	Severity 2
9) Excessive overtime hours i.e. total hours in excess of 72 hours per week on a regular basis and over an extended period.	Critical	60 days	Follow-Up	Severity 3

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Issue / Non-Compliance	Impact to the Business and Verification Plan			EHS Incident Reporting Guide
	Significance of Issues	Completion Timescale	Verification Method	Severity Level
10) Systemic use of overtime hours which exceed the local law daily / weekly / monthly over an extended period of time.	Critical	60 days	Follow-Up	Severity 3
11) Site does not monitor / is not aware of overtime hours for all employees.	Critical	60 days	Follow-Up	Severity 3
12) Illegal or improper use of overtime for pregnant / young or specific categories of worker	Critical	60 days	Follow-Up	Severity 3
13) Overtime is not voluntary for some workers (e.g. agency / temporary (workers) including threats of penalties e.g. threats of dismissal, pay cuts, demotion etc	Major	30 days	Follow-Up	Severity 2
14) Contract / employment conditions 'require' overtime, but there is no practice of requiring overtime	Minor	30 days	Desktop	Severity 1
15) Total hours exceed 60 hours on a regular basis for a minority of the workforce - ETI requirements are not met	Major	60 days	Follow-Up	Severity 2
16) Total hours exceed 60 hours per week on an occasional basis for the majority of the workforce – ETI exceptions are not met.	Major	60 days	Follow-Up	Severity 2
17) Isolated occurrence of workers not receiving 1-day rest in every 7 days	Minor	30 days	Follow-Up	Severity 1
18) Systemic occurrence of workers not receiving 2 days rest for every 14 days	Critical	30 days	Follow-Up	Severity 3

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Issue / Non-Compliance	Impact to the Business and Verification Plan			EHS Global Reporting Guide
	Significance of Issues	Completion Timescale	Verification Method	Severity Level
19) Workers are not entitled to daily meal and / or rest breaks that are in accordance with law	Major	30 days	Follow-Up	Severity 2
20) No sick leave provided for any Workers	Critical	30 days	Follow-Up	Severity 3
21) Insufficient (as per law) / unreasonably restricted leave for all workers e.g. annual, maternity, marriage leave	Major	60 days	Follow-Up	Severity 2
22) No maternity / paternity leave given to employees in line with local law requirements including marriage leave or other legally required leave	Critical	30 days	Follow-Up	Severity 3

**Method of Corrective Action: Third Party Audits**

- Correction of these issues must start immediately but a minimum of 2 months' records will be required for verification of correction.
- Working hours' corrective actions will require a follow-up visit for verification.
- SMETA guidelines require a minimum of 60 days (or two wages periods) attendance records to confirm that corrective actions have been completed.
- Confirmation will also require that documentary evidence is substantiated by worker interview. The number of records reviewed, and number of workers interviewed will not be less than the original audit.
- Where policies are inadequate, but practices meet the standard a desktop review may be possible at the discretion of the auditor.

**Internal Control System on Overtime & Rest Day Work**

- Plant General Manager [GM] is responsible to ensure no violations against Working Hour Standard in the plant.
- Plant HRM is responsible to monitor the excessive working hours [Overtime] and Rest Day Violations and ensure timely actions taken to avoid non-compliance.
- Plant production management team is responsible to ensure respective machine lines, departments follow the policy and process in maintaining the standard.
- Weekly and Monthly Monitoring System has been established to monitor respective plant's social responsibility to maintain compliance to the Core Working Standard.

### INCIDENT MANAGEMENT

- No employee shall be deployed to work in excess of the country law on Overtime.
- No employee shall be deployed to work on their Rest Day, every seventh day of the work week shall be the Rest Day for employees.
- Operations Management to consult respective HRM for advice on manpower planning and seek approval where necessary when making changes to the regular work roster system.

#### Internal Reporting System

Non-Compliance to Local Laws on Overtime and Rest Day

#### Plant HR Head

- Monitor the System
- Identify N-Cs
- Alert plant GM/Management
- Update the CSR Lead / Tracker

#### CSR Lead

- Update the CSR Monthly Tracker
- Online Dashboard Created
- Shared with OLT / ETL / Plant Ops / HR

End of document.