



<b>NOVEMBER 2019</b>	<b>S&amp;SD GROUP STANDARD</b> <b>Learning From Incidents</b> For Current Versions of S&SD Group Standards and associated documents go to Eureka	<b>Version 1</b>  <b>COPYRIGHT</b>
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**1. PURPOSE AND OBJECTIVES**

This Standard outlines the process for Learning from Incidents (LFI) which is expected for all incidents (unwanted events) with a safety, health, environment or social consequence across the Anglo American (AA) Group of operations.

The LFI process has five steps which ensure incidents are reported, investigated, learnings shared, and corrective and preventative actions communicated and closed out in a consistent manner. This is to ensure that AA learns from incidents, and the effectiveness of controls is continually reviewed and improved to prevent similar incidents (repeats) from occurring.

**2. SCOPE**

This Standard applies to all AA managed projects, operations or locations where AA is performing an activity (referred to here as sites). Where AA operates as the non-managing partner in a joint venture and an equivalent standard is not in place, we shall encourage the managing agent to apply this Standard or follow the approach and principles therein.

The Standard is not intended to take precedence over, or alleviate one from any local jurisdictional requirements, rather this Standard outlines a standardized investigation management approach intended to supplement and work in tandem with any local legislative requirements.

This Standard outlines the expectations for the investigation of direct and contributing factors, and the development of corrective and preventative actions, once the consequences have been dealt with in accordance with the site’s defined emergency response plans. The steps in **Figure 1** are detailed in this Standard and include required actions from the initiation of an investigation to the close out.

**Figure 1 – Learning from incidents process steps**

1 →	2 →	3 →	4 →	5
FIRST RESPONSE	CLASSIFY AND NOTIFY	ANALYSE	REPORT	SHARE AND LEARN
<ul style="list-style-type: none"> <li>Activate response to the event</li> <li>Secure the scene</li> <li>Preserve the evidence</li> <li>Identify witnesses</li> <li>Take statements</li> </ul>	<ul style="list-style-type: none"> <li>Classify incident</li> <li>Notify via Alert 1</li> <li>Select investigation team</li>   <li>For Significant Incidents an Immediate Call To Action is released</li> </ul>	<ul style="list-style-type: none"> <li>Plan</li> <li>Visit the scene</li> <li>Determine <b>What?</b> <ul style="list-style-type: none"> <li>- Conduct interviews</li> <li>- Create a sequence of events</li> </ul> </li> <li>Determine <b>How?</b> <ul style="list-style-type: none"> <li>- Control analysis</li> </ul> </li> <li>Determine <b>Why?</b></li> <li>Contributing factors summary</li> </ul>	<ul style="list-style-type: none"> <li>Make conclusions</li> <li>Determine corrective and preventative actions</li> <li>Complete the report template</li> <li>Review with site / business unit</li> <li>Issue final report</li> </ul>	<ul style="list-style-type: none"> <li>Share Alert 2</li> <li>Site / business units develop an action plan</li> <li>Monitor implementation and action management</li>   <li>For Significant Incidents a Global Call To Action is released</li> </ul>

This Standard applies to all Level 1 to 5 safety, health, environmental, and social incidents.

- Actual Level 4 or 5 incidents are referred to as **Significant Incidents**.
- Potential Level 4 or 5 incidents are referred to as **High Potential Incidents**.
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### 3. ROLES & RESPONSIBILITIES

All levels of AA from Group level functions to Business Units and down to sites have responsibilities in relation to incident management. These responsibilities are detailed in Appendix C.

### 4. PLANNING AND DESIGN

#### 4.1. Training

- For all incidents up to (and including) a Level 3 actual consequence, incident investigation facilitators must have attended the AA LFI Intermediate training (3-day programme), or Group approved e-learning modules.
- For all High Potential and Significant Incidents, incident investigation facilitators must have attended the AA LFI Advanced training (5-day programme).

#### 4.2. Site incident management procedure

Sites are required to develop and implement incident management procedures to enable them to effectively address incidents. The procedures must be consistent with the applicable local legislation, the AA SHE Way, Social Way and this Standard. The consequences of an incident must be dealt with in line with the site's defined emergency response plan (as appropriate to the type of incident).

#### 4.3. Systems and documents

Enablon is the mandated platform to record the LFI process.

The LFI process must be documented and tracked from initial logging to close out of preventative and corrective actions in Enablon.

This applies to all the consequent type incidents irrespective of severity.

### 5. IMPLEMENTATION AND MANAGEMENT

The objectives of the incident investigation and analysis process are to:

- Gather all relevant information and evidence,
- Determine **What** happened,
- Define the sequence of events leading up to, including, and after the incident,
- Determine the direct and contributing factors of the incident to understand **How** and **Why** it happened,
- Define actions to prevent similar incidents from occurring, and
- Share lessons learned to enhance organizational learning and institutionalize change.

The AA LFI Management Process is presented in **Figure 1**. Detailed guidance on each of the five steps of the process for investigators is available in the LFI Field Guide. Specific expectations for each of the steps is included in the sections below.

#### 5.1. First response (*LFI process step 1*)

Immediately after an incident (unwanted event) the site emergency response plan must be followed, where after evidence is preserved, witnesses identified, and statements taken.

For incidents which are not significant, the appropriate response to ensure the scene or situation is made safe, further release of a hazard is prevented, or the necessary engagement with stakeholders or employees is undertaken, according the site procedure is sufficient.

#### 5.2. Classify and notify (*LFI process step 2*)

The incident severity is classified, where after the Alert 1 notification is released and an investigation team assembled.



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### 5.2.1. Classification

Incidents are classified according to severity using the AA Group Risk Matrix (Appendix 5) in conjunction with the detailed discipline specific guidance provided in specifications supporting this Standard.

Initial diagnosis of an occupational disease or estimation of an environment consequence is considered as the severity classification step for health or environmental incidents.

Classification of the actual and potential severity and may be adjusted after investigation and must be updated in Enablon accordingly.

### 5.2.2. Notification

All incidents shall be captured in Enablon and the notification (Alert 1) released from Enablon by the incident validator within 48 hours. Recipients for Alert 1 for Level 1 to 3 incidents must be defined by the site incident management procedure.

Specific notification requirements for Significant Incidents is as follows:

- **Significant Incidents** shall be notified to the BU CEO, AA CEO, AA Technical Director, AA Group Head of S&SD Head and / or AA Group Head of SP&E within 2 hours.
- **High Potential Incidents** shall be notified to the relevant AA SHE discipline Head or AA SP&E Head within 48 hours.
- **Level 3 Environmental incidents** shall be notified to AA Head of Environment within 48 hours.

Legal privilege processes shall be initiated immediately following any High Potential or Significant Incident by the site, as appropriate, to ensure legal privilege is established and maintained. Notification of High Potential or Significant Incidents to external stakeholders and regulators shall be managed by the site through legal counsel as appropriate.

### 5.2.3. Selection of the team and investigation independence

The severity of the incident will determine the organizational level and degree of independence from which the investigation Team Leader and team members are selected.

All investigations will be facilitated by a competent person who has attended the appropriate level of training.

- **Level 1 incidents** shall be investigated by the site.  
Team members will include a line manager / supervisor as the Team Leader who is independent to the workplace / section, as well as the relevant technical expert(s) and SHE professional(s).
- **Level 2 and 3 incidents** shall be investigated by the site.  
Team members will include a middle manager as the Team Leader who is independent to the workplace / section, as well as the technical expert(s) and SHE professional(s).
- **High Potential Incidents** shall be investigated by the Business Unit or Group Function with the involvement of the site.  
Team members will include a senior manager as the Team Leader who is independent to the work place / section, as well as the technical expert(s) and SHE professional(s) independent from the site as determined by the site's general manager and the Business Unit or Group Function.
- **Significant Incidents** shall be investigated by a Group-led independent investigation team which includes site and BU or Group Function team members.  
Team members will be appointed by Group S&SD or SP&E and will include a general manager as the Team Lead who is independent to the Business Unit or Group Function, a facilitator independent to the Business Unit or Group Function, the site SHE manager, relevant technical experts, an industrial psychologist, and legal representation.

## 5.3. Analyse (LFI process step 3)



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Preserving the scene, evidence gathering, and taking of statements must commence immediately by the site (step 1). Incident investigation and analysis using the LFI analysis tools (step 3) must be initiated and completed as soon as reasonably practical.

**High Potential Incident** investigation analysis shall start no later than 14 days after the date of the incident.

**Significant Incident** investigation analysis shall start no later than 21 days after of the date of the incident.

Investigations into High Potential Level 5 incidents carried out by the Business Unit or Group Function will be reviewed by Group S&SD and SP&E.

The severity of the incident will guide which tools are required as a minimum (See Figure 2).

To ensure a clear understanding of “why” the incident occurred, direct and contributing factors shall be categorized as to their origin (i.e., Individual, Workplace, or Organizational Factors).

**Figure 2 – Tools to be used in incident analysis based on the incident severity**

	Time Series	Control Analysis	Behavioural Analysis	Change Analysis	Why Analysis
	What happened	How it happened	Why it happened		
Level 1	✓	✓	Select when appropriate		
Level 2	✓	✓	Select when appropriate		
Level 3	✓	✓	Select when appropriate		
High Potential or Significant Incidents	✓	✓	✓	✓	✓

**5.4. Report (LFI process step 4)**

Alert 1, Investigation Report, and Alert 2 must be prepared and submitted according to the timelines in the table below.

The investigation facilitator is responsible for ensuring that information generated using the LFI investigation tools (including the summary, conclusions, and corrective / preventative actions) during the analysis is captured in Enablon.

Alerts (Alert 1 and 2) and the Incident Investigation Report are generated directly from Enablon once validated by the Lead, with the exception of Reports under legal privilege for High Potential or Significant Incidents.

The site / Business Unit / Group Function is responsible for developing Action Plans and Tasks in Enablon to address the corrective and preventative actions presented in the Incident Investigation Report by the investigation team.

Incident severity	Alert 1	Incident Investigation Report	Alert 2
Level 1 – 3 incidents	Site or BU release Alert 1 within 48 hours of the time of the incident from Enablon	Managed according to the site incident management procedure and must be captured in Enablon.  Alert 2 to be released from Enablon.	
High Potential and Significant Incidents	Site or BU release Alert 1 within 48 hours of the time of the incident from Enablon	Report generated within 30 days of the last day of the investigation and submitted by the Lead of the investigation	Alert 2 released within 14 days after completion of the investigation  Group SSD or SP&E develop, approve, and release the SHE Alert and Global Call To Action



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Level 3 environmental incidents must also follow the environmental specification for reporting findings and learnings to the AA Head of Environment.

### 5.5. Share and learn (*LFI process step 5*)

For High Potential and Significant Incidents:

- Group SSD or SP&E will develop, approve, and release an Immediate Call To Action, SHE Alert, and Global Call To Action as appropriate;
- All SHE Alerts shared by Group S&SD or SP&E for High Potential or Significant Incidents must be appropriately cascaded by Business Units to sites
- Actions will be uploaded against sites for action and close out in Enablon by Group SSD or SP&E, and actions will be tracked and close-out monitored by Group.
- Significant Incidents shall be shared with the AA Executive Directors and the AA Board Sustainability Committee by Group S&SD or SP&E.

For all incidents:

- Tasks identified by the site / Business Unit / Group Function to address the recommendations made by the investigation team must be captured in an Action Plan in Enablon and shall be tracked in Enablon until completion.
- The site is responsible to ensure that all actions stemming from an incident investigation are timeously closed out.
- Briefings on findings relevant to Group Functions (for example Supply Chan or HR) will be managed by Group S&SD or SP&E and where relevant actions uploaded into Enablon.
- All actions must consider the necessary Management of Change and must result in a review of the respective bowtie and control strategy.

## 6. PERFORMANCE MONITORING

To ensure the incident management process defined in this Standard is adhered to Business Units / Group Functions and sites must ensure that there is a process to critically review the implementation of the requirements contained in this Standard. Business Units and Group SSD will provide guidance and oversight to ensure requirements are met.

### 6.1. Performance evaluation

Each site must ensure that the SHE Management System and SP&E monitoring plan includes KPIs relating to incident management.

KPIs which will be used to track compliance to the process in Enablon include:

- Alert 1 released on time from Enablon
- Alert 2 released on time from Enablon
- All incidents are investigated, and Action Plans with Tasks are developed
- Completion rates of Action Plans and Tasks

### 6.2. Assurance

Sites must ensure adherence to the LFI process around the reporting, investigation, closing out and communication of incidents. The site is to maintain evidence that incidents are managed according to this procedure.

Business Unit and Group level assurance of the process will apply through reviews of the SHE Way self-assessment results, Social Way assurance, and management reviews of the incident investigations.



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Assurance of action close out and effectiveness for those actions required by an Immediate or Global Call To Action, and actions assigned through Group-led Significant Incident LFI investigation reports, will be managed through the defined assurance framework and verified annually.

**APPENDIX A: REFERENCED DOCUMENTS**

Document Number	Previous Number(s)	Title
SHE Way	...	...
Social Way	...	...
		Specification for the recording of Anglo American Safety and Health Incidents (version 3, November 2015)
		Environmental incident severity classification matrix
		Occupational health and hygiene incident severity classification matrix
		Social incident severity classification matrix
		Specification for the response to and investigation of fatal incidents
		LFI Field Guide
		AA Group Legal Best Practice Guideline for Independent Investigations

**APPENDIX B: RECORD OF AMENDMENTS**

Issue 0 : New document based on S&SD Group Guideline Incident Management – Learning From Incidents (AASDG Incident Management, dated May 2018)

**APPENDIX C: ROLES AND RESPONSIBILITIES**

- **Group S&SD<sup>1</sup>** is responsible for:
  - ensuring training programs, information management systems, tools, resources, and support services are available to facilitate comprehensive, objective, and timeous investigation of SHE-related incidents;
  - sharing appropriate incident investigation learnings and actions with all levels of management; and
  -
- **Group S&SD and Group SP&E<sup>2</sup>** will:
  - set appropriate key performance indicators;
  - analyze and identify incident trends, observations, findings, learnings, and action close-out and control effectiveness, and share these with senior and executive management; and will
  - work with the relevant Group Technical Departments to review Group Technical Standards as required; and

<sup>1</sup> Group S&SD – Anglo American Group Safety and Sustainable Development  
<sup>2</sup> Group SP&E – Anglo American Group Social Performance and Engagement



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- collaboratively develop and release Immediate and Global Calls To Action, and upload tasks for sites / operations through Enablon.
- **Group Technical Departments** will participate in and support Significant Incident investigations as needed and will work with Group S&SD and SP to review Group Technical Standards to integrate learnings from incidents where required.
- **Group Legal Counsel** will provide guidance and direction to ensure legal requirements are met while minimizing any potential legal risk, and will assist with drafting internal and external communications, including engaging and maintaining legal privileges.
- **Business Unit CEOs<sup>3</sup> and Group Function Heads** will:
  - ensure incidents are investigated comprehensively, recommended actions are implemented timeously, and that learnings are effectively communicated across the BU portfolio and are integrated into respective operations / activities;
  - report all Significant Incidents to the Group CEO in accordance with the expected timeframes.
- **Business Unit Heads of S&SD, SHE, SP&E or equivalent** will:
  - ensure incidents are investigated comprehensively, recommended actions are implemented timeously, notifications are appropriately escalated, assist in investigations, analyse and identify incident trends and define tactical actions to prevent incidents and mitigate consequences; and will
  - ensure psychological support / mental wellness for site / operational teams and workers either directly or indirectly involved in loss of life incidents, and / or site / operational investigation teams (including first responders and proto / mines rescue teams).
  - ensure psychological support / mental wellness is available for all employees diagnosed with premature life-ending illness or incapacity (significant health incidents)

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<sup>3</sup> Business Unit CEOs – all Chief Executive Officers of Business Units within the Anglo American managed portfolio



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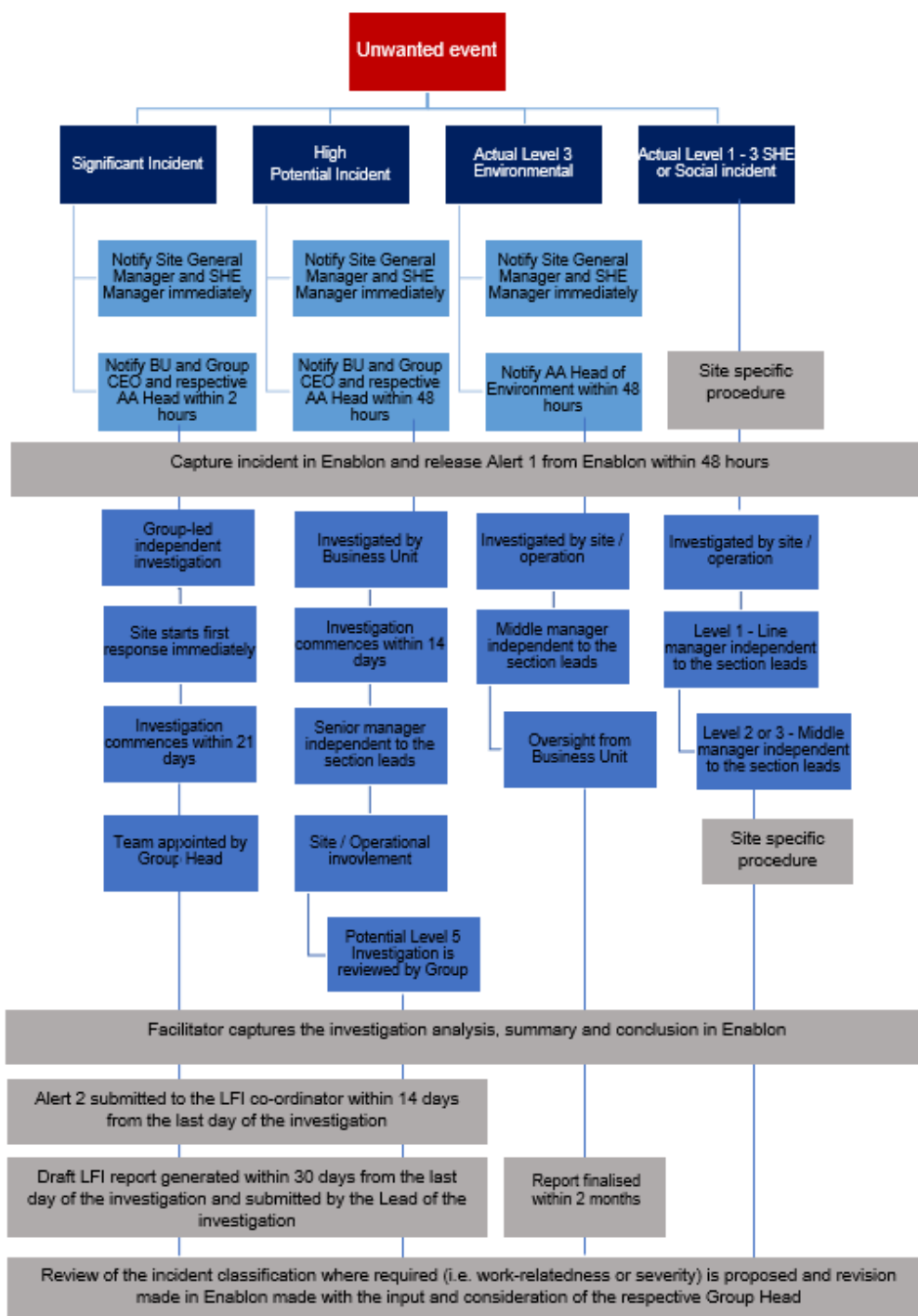
- **Site / Operational leadership** will ensure:
  - site incident management procedures are developed and implemented in alignment with this Standard;
  - all individuals potentially involved in incident management are properly trained in the LFI process, competent, and resourced to effectively carry out their respective roles;
  - all incidents are reported, properly categorized, recorded, escalated and investigated;
  - investigations are led by an appropriate management representative and facilitated by an individual trained and competent in the LFI process;
  - learnings from both site / operational incidents those shared by Group S&SD and SP are effectively communicated to appropriate site / operations managers and employees, including contractors, and corrective / preventative actions are implemented;
  - risk assessments and control registers are routinely updated to incorporate learnings;
  - action plans and tasks are captured in Enablon and tracked to completion; and
  - investigative programs and processes are routinely reviewed.
  
- **Site S&SD, SHE and / or SP&E managers** will oversee the day-to-day implementation of the Site incident management procedure, including:
  - escalating incident notifications and ensuring trained and competent facilitators are available to support incident investigations;
  - ensuring an incident management system and associated database is established and accurately maintained, and that all incidents are captured directly into Enablon;
  - incident trends are identified and analyzed, including investigative finding, observations, and outcomes, and learnings are shared with all employees and contractors;
  - Key Performance Indicators (KPIs) to understand LFI process effectiveness at sites are established and performance is routinely measured and reported to site / operations management;
  - verification of incident action items are taken in a timeous manner and are effective.
  
- **Employees, Contractors and third party service providers** will report all incidents to site / operations management immediately, cooperate, contribute, and participate in incident investigations as needed / required.





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**APPENDIX C: PROCESS FLOW**





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**APPENDIX D: DEFINITIONS**

<b>Alert 1</b>	An initial notification, released from Enablon, indicating to the recipient of the Alert that an incident has occurred. The notification includes the Business Unit and site at which the incident occurred, the date and time of the incident, the incident actual and potential severity, and a brief description.
<b>Alert 2</b>	A follow up notification, released from Enablon, sharing learnings and required action to prevent repeats once an incident investigation has been completed. The notification includes a more detailed summary of the event, the conclusions made by the investigation team, and corrective and preventative actions. The Alert 2 is summary of the Incident Investigation Report which is intended for sharing broadly across the business to ensure learning and action to prevent similar incidents (repeats) from occurring.
<b>Causation</b>	Factors that act together to cause an incident. They include personal factors (i.e., capability, knowledge, behaviour), workplace factors (i.e., equipment / workplace conditions, design, availability), and organizational factors (i.e., culture, leadership, planning).
<b>Competent Person</b>	An individual who is qualified because of their knowledge, training, and work experience, who is familiar with applicable legislative requirements, and understands hazards and risks associated with the respective activity.
<b>Contributing Factor</b>	Event or condition that together with other causes increased the likelihood of an incident but which individually did not cause the incident.
<b>Direct Cause</b>	An action, event, flaw or force that is the immediate, initiating or primary agent which leads to, or allows an incident to happen.
<b>Global Call To Action</b>	A communication from Group SSD, usually sent together with a SHE Alert, outlining the key actions required to prevent a repeat Significant incident or a trend in High Potential Incidents. All actions are loaded into Enablon for action management and close out.
<b>Harm</b>	Physical or biological damage, loss or impairment, negative impacts on individuals or communities or some other change to a worse state.
<b>Hazard</b>	Source or situation with the potential for harm.
<b>High Potential Hazard (HPH)</b>	Is a condition or situation which could materialize into an unwanted event with a consequence rating of 4 (High) or higher as referenced on the Group Risk Rating Matrix. A Near Miss with a potential consequence rating of 4 (High) or higher as referenced on the Group Risk Rating Matrix shall be classified as HPH.
<b>High Potential Incident (HPI)</b>	Referring to the Anglo American Group Risk Rating Matrix, an HPI is an incident with an actual consequence rating of “3 – Moderate” or lower but possessing a reasonable worst case potential consequence rating of “4 – High” or higher. Any incident where the actual consequence is a Level “3 -Moderate” or lower when the event has been identified is the site / operations baseline risk assessment as a priority unwanted event (PUE) must be reported as an HPI.



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- Immediate Action**      Actions taken after an incident to stabilize or reinstate normal conditions. These actions are generally aimed to mitigate the immediate actual or potential impact by addressing direct or immediate causes of the incident.
  
- Immediate Call To Action**      A communication from the desk of the AA CEO notifying the business of a Significant Incident and outlining the key immediate actions, based on known facts and Group Technical or other Standards, required to prevent a repeat incident. All actions are loaded into Enablon for action management and close out.
  
- Incident**      An Unwanted Event which instantaneously or over the course of time harms or otherwise negatively impact people, the environment, company assets (i.e., plant, property, or equipment) and / or the company’s reputation. It is an unwanted event which leads or may lead to the actualization of risk.
  
- Incident Investigation**      The process of systematically gathering and analyzing information about an incident or a near miss (unwanted event) to identify contributing factors and formulate recommendations to prevent recurrence.
  
- Learning from Incidents (LFI)**      A defined Anglo American process to drive continuous Safety, Health, Environmental and Social performance improvement through structured incident investigation, analysis, and communication as referenced in the LFI Field Reference Guide.
  
- Preventative and Corrective Actions**      An action typically taken to prevent recurrence of the incident or similar incidents. Typically, these actions address contributing factors.
  
- Repeat incident**      A repeat incident is an incident that stemmed from the same hazard as a prior incident, occurred due to the same or similar control failures and resulted in a similar consequence or had the potential to result in similar consequences as an incident which has previously occurred and within Anglo American operations.
  
- Risk**      The chance of something happening that will have an impact on objectives. It is usually measured in terms of event likelihood and consequences.
  
- SHE Alert**      An Alert, based on learnings and actions derived from either a specific incident, or several incidents, developed by Group SSD which briefly describes an incident scenario, key learnings, and action required.
  
- Unwanted Event**      A description of a situation where the hazard has or could possibly be released in an unplanned way, including a description of the consequences.

**APPENDIX E: ANGLO AMERICAN GROUP RISK MATRIX**

RISK MATRIX	CONSEQUENCE RATING				
CONSEQUENCE TYPE	1 - Insignificant	2 - Minor	3 - Moderate	4 - High	5 – Major



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<b>Material losses/ damage/ business interruption</b>	<0.01% of annual revenue/ total assets	0.01 – 0.1% of annual revenue/ total assets	0.1 -1% of annual revenue/ total assets	1-5% of annual revenue/ total assets	>5% of annual revenue/ total assets
<b>Harm to People Safety</b>	First aid case	Medical treatment case	Lost-time Injury	Permanent disability or single fatality	Numerous permanent disabilities or multiple fatalities
<b>Harm to People Occupational Health</b>	Hazard exposure with temporary discomfort	Hazard exposure with symptoms requiring medical treatment	Hazard exposure >OEL with reversible health impact & lost-time	Hazard exposure >OEL with irreversible health impact or a single death	Hazard exposure >OEL with irreversible health impact or death of multiple EEs
<b>Environment</b>	Impact last days or less, effects small area (meters), receptors of low significance	Impact lasts weeks or less, effects a reduced land area, no sensitive species/habitats	Impact lasts months, extended area (km), some environmental sensitivity	Impact lasts years, effects sub-basin, impacts sensitive species/habitat	Permanent impact, effects basin/region, impacts highly sensitive species/habitat
<b>Legal &amp; Regulatory</b>	Technical non-compliance, no warning, no regulatory reporting required	Breach of regulation, regulatory reporting / involvement, admin fine	Minor breach of law, regulatory investigation, enforcement action	Breach of law, criminal prosecution, enforcement action, temp license susp.	Sig breach of law, lawsuit, license revoked / substantially modified
<b>Social / Communities</b>	Minor disturbance of culture / social structure	Some impact on local pop, mostly repairable, concerns from single stakeholder	On-going social issue, isolated complaints from community stakeholders	Significant social impact, organized protests threaten operational continuity	Major widespread social impact with operational impact, LTO jeopardized
<b>Reputation</b>	Minor impact, concern from specific individuals	Limited impact, concerns from certain groups/org's	Local impact, local public concern/publicity w/i neighboring communities	Suspected reputational damage, local regionals concern/reaction	Noticeable reputational damage, national / international attention

**APPENDIX F: RECORD OF AMENDMENTS**