



INCIDENT REPORTING

Integrated Water Services, Inc.
(the Company)



Purpose

The purpose of this program is to have effective procedures for reporting incidents.

Responsibilities

Individual responsibilities for reporting incidents are pre-determined and assigned prior to incidents.

Safety Director

- Ensures incidents are documented, reported, and investigated as required by this procedure.
- Tracks all corrective actions to close-out.
- Case manages all injury incidents and coordinates appropriate occupational injury care.

Site Manager/Supervisor

- Ensure incidents are reported as required by this procedure.
- Supports the Safety Director in the Case Management process.
- Gathers evidence, photos, documents, and witness statements to support the documentation and investigation process.
- Manage the corrective action to close.

Employees

- Immediately report any incident or near-miss that occurs to your immediate supervisor. If your immediate supervisor is not available in person or by phone, send a text message.
- Update your supervisor of any changes regarding the incident- changes could be changing conditions, severity, cost, regulatory interaction, law enforcement interaction, family inquiries, escalation in severity, etc.
- Follow-up to close out assigned corrective actions, be it treatment, corrective, or communications, etc.

Procedure

Incident Reporting

- Integrated Water Services investigates accidents and near-misses to prevent recurrence and ensure the safety of our employees and the environment. Accidents are undesired events that result in harm to people, damage to property, loss to process and/or the environment and/or damage to the reputation of the Company. Near-misses are defined as undesired events which, under slightly different circumstances, could have resulted in harm to people, damage to property, loss to process and/or the environment or damage to the reputation of the company. Both accidents and near misses are collectively referred to as Incidents.
- Employees and contractors are to report all Incidents, unsafe acts, and unsafe conditions to their supervisor as soon as possible and in accordance with the reporting guidelines set forth below. Reported Incidents may receive varying levels of investigation based on the severity of risk potential of the Incident.



Incidents Reporting Procedures

- Injury incidents must first be reported to the project supervisor and then to the WorkCare injury case management team by calling: 1-888-449-7787.
- In the event of an incident that requires immediate emergency response, contact 911 or the appropriate emergency services listed in the Emergency Action Plan (EAP) for your specific project. To create an EAP for your project, go to www.iws.support Emergencies tab and complete an Emergency Action Planning form. Upon submitting the form an EAP will be delivered to your email.
- All incidents shall be reported, documented, and investigated for causal factors, and the results must be reported to Integrated Water Services utilizing the incident notification form located in the Company Support Center at www.iws.support in the Incident Management tab. The incident notification form will also be utilized as a means for tracking changing conditions or diagnosis surrounding incidents. It is the responsibility of the Integrated Water Services supervisor, the project safety steward, and the safety director to cooperate in the action of gathering and reporting incident related information.
- When an incident report is initiated, the notification process is automated via conditional logic tools that manage the desired workflow. It is imperative that the information reported is truthful and thorough throughout all phases of response and investigation.

Spill and Hazardous Substance Reporting

- Spills of hazardous substance shall be reported through the Integrated Water Services Support Center Spill Report Form at www.iws.support in the Incident Management tab. It is required that spills in excess of the respective state's reportable quantity be reported in compliance with state requirements. In some cases, there are federal reporting requirements in addition to state requirements.
- All state reporting requirements are made available in the Incident Management tab of the Support Center. Only the Environmental Engineers, the Safety Director, or their designates are allowed to submit a state report on behalf of the Company.

OSHA Reporting

Fatality: Within eight (8) hours after the death of any employee as a result of a work-related incident, Integrated Water Services Safety Director shall report the fatality to the Occupational Safety and Health Administration (OSHA), U.S. Department of Labor.

In-patient hospitalization, amputation, or loss of an eye: Within twenty-four (24) hours, Integrated Water Services Safety Director must report in-patient hospitalization, amputation, or loss of an eye (severe injuries) to OSHA.

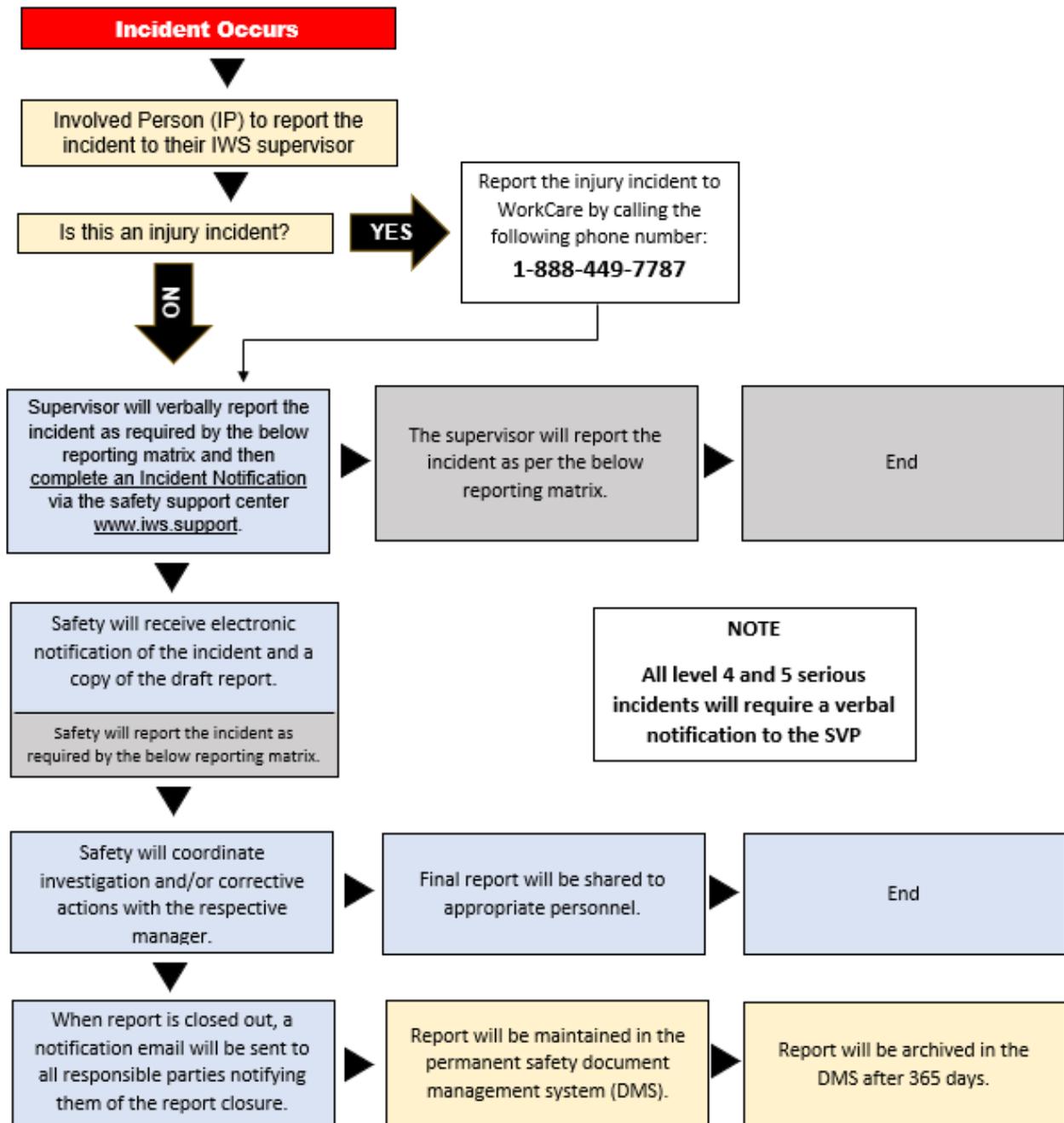
OSHA reports must be made using one of the following methods:

- by telephone or in person to the OSHA Area Office that is nearest to the site of the incident,
- by telephone to the OSHA toll-free central telephone number, 1-800-321-OSHA (1-800-321-6742),
- or by electronic submission using the reporting application located on OSHA's public web site at www.osha.gov.



Internal Reporting Guidelines

Incident Report Notification Flowchart





SEVERITY	CONSEQUENCE				PROBABILITY				
	P	E	A	R	1	2	3	4	5
					Never Happened	Happened 1/5 Years	Happens 1/Year	More Than 1/Year	Frequent Occurrence IDLH
0	No Health Affect	No Affect	No Damage	No Impact	0	0	1	1	2
1	First Aid Injury	Slight Affect <i>immediate remediation possible</i>	Slight Damage <i>no cost</i>	Potential Minor Impact <i>near-miss</i>	0	0	1	2	3
2	Recordable Injury	Minor Affect <i>contained/ one worker</i>	Minor Damage <i><\$25k</i>	Slight Impact <i>internal impact</i>	0	1	2	3	3
3	Lost Time Injury	Localized Affect <i>contained/ requires work stoppage</i>	Serious Damage <i>>\$25k <\$75k</i>	Limited Impact <i>single customer</i>	1	2	3	3	4
4	Single Fatality	Major Affect <i>recordable/ not contained</i>	Major Damage <i>>\$75k <\$150k</i>	Considerable Impact <i>multiple customers potential national impact</i>	2	3	4	5	5
5	Multiple Fatalities	Massive Affect <i>not contained/ requires emergency responders/ fire/ media</i>	Catastrophic Damage <i>>\$150k</i>	Global Impact <i>multiple customers national impact</i>	3	4	5	5	5

IDLH: Immediately Dangerous to Life or Health

REACTION KEY & REPORTING MATRIX	
0	No immediate action required- manage risk to prevent escalation to a higher risk category. Local notification report maintained within department.
1	Schedule remediation for most convenient operational window – 6-month deadline. Local notification report maintained within department.
2	Schedule remediation at earliest available operational window – 90-day window. Local notification report maintained within department.
3	Make special arrangements to schedule remediation – 7-day window. Report escalated to department Director or Region VP.
4	Stop the work that presents the hazard immediately and eliminate the risk immediately. Report escalated to department SVP. SVP report to CEO as appropriate.
5	Stop the work that presents the hazard immediately and eliminate the risk immediately. Report escalated to department SVP. SVP report to CEO as appropriate.
CONSEQUENCE KEY	
P	People
E	Environmental
A	Assets
R	Reputation

Incident Preservation

Get pictures of the area and all associated equipment and grounds of the incident. Close-up and distance photos are most helpful.

In the event of an OSHA reportable injury, the site shall be preserved 100% until released by the OSHA CSHO or the investigating law enforcement agency. The Safety Director will provide notification to Company personnel that the site has been released back to operations.

Collection/Preservation and Security of Evidence

In some cases, as determined by the Safety Director, evidence such as people, positions of equipment, parts, and papers must be preserved, secured, and collected through notes, photographs, witness statements, flagging, and impoundment of documents and equipment.



Witness Interviews and Statements

Witness interviews and statements must be collected. Locating witnesses, ensuring unbiased testimony, obtaining appropriate interview locations, and use of trained interviewers should be detailed. The need for follow-up interviews should also be addressed.

The final incident investigation report consists of findings with critical factors, evidence, corrective actions, responsible parties, and timelines for corrective action completion.

Written Incident Report

The IWS Incident Notification form must be completed for every Near Miss and Incident that occurs in Company operations. Spills must be documented in the Spill Notification form that is located at www.iws.support in the Incident Management tab.

The supervisor takes the following steps after an injury incident.

- Provide for medical or emergency response as appropriate.
- Secure the area or evacuate and muster as quickly as possible.
- Secure evidence as necessary.
- Notify project management via phone.
- Identify potential witnesses and retrieve statements.
- Use investigation tools, as needed to record the scene (camera, drawings, video, etc.)
- Tag out as appropriate any equipment that was involved (evidentiary purposes).

Vehicle Accidents

In an attempt to minimize the results of an accident, the driver must move the vehicle from the highway, if possible, to prevent further damage or injuries. The following steps must be taken in response to all vehicle accidents:

- Call for medical aid if necessary.
- Call the police. All accidents, regardless of severity, must be reported to the police. If the driver cannot get to a phone, he should write a note giving location to a reliable appearing motorist and ask them to notify the police.
- Record names and addresses of driver, witnesses, and occupants of the other vehicle(s) involved in the accident.
- Complete the Incident Notification form located in the Support Center at www.iws.support.
- Gather the following information: license number of other drivers; insurance company names and policy numbers of other vehicles; make, model, and year of other vehicles; date and time of accident; and overall road and weather conditions.
- Use your cell phone to capture a photo of the other driver's insurance policy information.
- Use your cell phone to take pictures of the scene from a distance far enough away to capture all vehicles involved and get close up photos of the damage. If there are any contributing factors or tangibles, get photos of those as well.
- Do not discuss the assumed cause of the accident with anyone at the scene except the police.



- Do not accept any responsibility for the accident. Don't argue with anyone.
- Provide the other party with your name, address, driver's license number, and insurance information.
- Immediately report the accident to your manager and the HR Director.

Note: There will be a formal accident review conducted on each accident to determine the cause and how the accident could have been prevented.

Driver Guidelines and Reporting Requirements

- Company vehicles are to be driven by authorized employees only, except in the case of repair testing by a mechanic.
- All accidents in company vehicles, regardless of severity, must be reported to the police and to the Safety Director. Accidents are to be reported immediately from the scene of the accident. Accidents in personal vehicles while on company business must follow these same accident procedures. Work related vehicle accidents that cause injury to the employee must be reported to the Safety Director and HR Director for Worker's Compensation purposes. Failing to stop after an accident and/or failure to report an accident may result in disciplinary action, up to and including termination of employment.

Training

Integrated Water Services shall train appropriate personnel in their responsibilities for incident reporting. Training requirements relative to incident reporting are described below:

- Roles & responsibilities
- First responder responsibilities
- Evidence preservation
- Reporting
- The initial investigation at the accident scene
- Managing the incident and investigation
- Collecting data
- Developing conclusions and judgments
- Reactive measures