	Health, Safety & Environmental Incident Management			Page 1 of 10
	Approved By M. Miller	Issue Date 01/01/2020	Revision Date	Revision Number 0

1 Purpose

The purpose of this standard is to establish Silver Eagle Distributors Houston, LLC's (Silver Eagle Houston's) expectation that all incidents will be reported and managed consistently and its requirements for evaluating/investigating incidents and non-conformances and developing corrective actions to prevent reoccurrence.

2 Definitions

Incident – Any unplanned event with actual or potential negative consequences. This will include near misses, work-related injuries/illnesses, environmental impacts, vehicle incidents, property damage/theft, and general liability.

- **Near Miss** – An unplanned event that under slightly different circumstances would have led to injury, environmental damage or asset damage.

Example: When lifting a pallet of kegs, the pallet buckled. The kegs fell from a height of about ten feet, and one landed just inches from a product handler standing nearby.

- **Injury/Illness** - An abnormal condition or disorder caused by a work-related event. Injuries include cases such as, but not limited to, a cut, fracture, sprain, or amputation. Illness includes both acute and chronic illnesses, such as, but not limited to, a skin disease, respiratory disorder, or poisoning.

Example: When lifting a pallet of kegs, the pallet buckled. The kegs fell from a height of about ten feet, and one landed on the foot of a product handler, causing a toe to fracture.

- **Environmental Impact** - The spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, disposing or migration of any chemical, or gas, into the environment.

Example: When lifting a pallet of kegs, the pallet buckled. The kegs fell from a height of about ten feet, and one slammed against a container of Drafterc line cleaning solution. The container tipped over, spilling solution onto the floor and into the nearby drain.

- **Vehicle Incident** - Damage to a Silver Eagle Houston vehicle, or damage to another vehicle, as a result of being involved in the act of driving on public or private roadways.


Example: While out delivering product, a Sales Rep began to slow, to make a right turn into an account. The driver in the car following the SED vehicle failed to adjust speed and rear-ended the Silver Eagle Houston vehicle.

- **Property damage/theft** - Any damage to, or theft of, Silver Eagle Houston owned equipment, facilities, or products.

Example: When lifting a pallet of kegs, the pallet buckled. The kegs fell from a height of about ten feet, and one slammed against the flow rack. The impact of the keg bent the support beam of the rack, rendering it out of service.

While out delivering product, a Sales Rep began to down-stack cases of beer. While the Sales Rep's back was turned, an individual grabbed a case of beer and fled the scene.

- **General Liability** - Any injury or damages (to a third party's person or property) that resulted from activities being performed for/by Silver Eagle Houston.

	Health, Safety & Environmental Incident Management			Page 2 of 10
	Approved By M. Miller	Issue Date 01/01/2020	Revision Date	Revision Number 0


Example: When lifting a pallet of beer, the pallet buckled. The cases fell from a height of about ten feet, and one landed on the foot of a nearby shopper.

While out delivering product, a Bulk Driver hit the receiving door with the load rest of the pallet jack, bending the bay door.

First aid treatment - Any work-related injury/illness that is minor in nature and can be treated at the work site or by a physician in one visit and does not require ordinary medical care. These treatments are considered first aid, even if rendered by a medical professional:

- Using a nonprescription medication at nonprescription strength (for medications available in both prescription and nonprescription form, a recommendation by a physician or other licensed health care professional to use a non-prescription medication at prescription strength is considered medical treatment);
- Administering tetanus immunizations (other immunizations, such as Hepatitis B vaccine or rabies vaccine, are considered medical treatment);
- Cleaning, flushing or soaking wounds on the surface of the skin;
- Using wound coverings such as bandages, gauze pads, etc.; or using butterfly bandages or Steri-Strips™ (other wound closing devices such as sutures, staples, surgical glue, etc. are considered medical treatment);
- Using hot or cold therapy;
- 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);
- Using temporary immobilization devices while transporting an incident victim (e.g., splints, slings, neck collars, back boards, etc.).
- Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister;
- Using eye patches;
- Removing foreign bodies from the eye using only irrigation or a cotton swab;
- Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means;
- Using finger guards;
- Using massages (physical therapy or chiropractic treatment are considered medical treatment); or
- Drinking fluids for relief of heat stress.

Lost time incident - Any work-related injury/illness that requires treatment by a physician and one or more days off work. The treating physician must support any time off in writing. Lost Time does not include the day of the injury. The next full day is the first day of Lost Time, regardless of whether it is a weekend, holiday or the employee was not scheduled to work.

	Health, Safety & Environmental Incident Management			Page 3 of 10
Approved By M. Miller	Issue Date 01/01/2020	Revision Date	Revision Number 0	Document Number SED-CORP-HSE-2-027

Medical treatment - Any necessary treatment of an injury or illness by a physician that does not result in work restrictions or lost work days and is not specifically classified as first aid above.

Recordable Injury - Any work-related death, illness or injury which result in:

- lost time,
- loss of consciousness,
- restriction of work or motion that prevents normal job function,
- transfer to another job or
- required medical treatment beyond first aid.

Modified, restricted or light duty - Physical or mental limitations to regular work assignments that result from a work-related injury or illness.

3 Responsibilities

3.1 Employees will:

- 3.1.1 Immediately report any incident.
- 3.1.2 Cooperate fully in any incident investigations.
- 3.1.3 Employees who could be first responders will be trained and qualified in first aid techniques to control the degree of loss during the immediate post-incident phase.

3.2 Supervisors will:

- 3.2.1 Investigate (or assists in) incident investigations;
- 3.2.2 Correct hazards and non-conformances under their control; and
- 3.2.3 Ensure injured or ill employees cooperate with Silver Eagle Houston's injury and illness management process.


3.3 The HSE Department will:

- 3.3.1 Ensure appropriate case management for employees' work-related injuries and illnesses.
- 3.3.2 Ensure investigations are conducted and assists in identifying corrective actions.
- 3.3.3 Ensure that incidents are recorded in and tracked to closure using Silver Eagle Houston's HSE performance management system.
- 3.3.4 Ensure compliance with any federal, state or local reporting or recordkeeping requirements.

4 Requirements

4.1 Incident Reporting

- 4.1.1 Employees and contractors will **immediately** report to the Emergency Call Center (ECC) all:
 - Work-related injuries or illnesses, no matter how minor,
 - Vehicle incidents,
 - Property damage/theft,

	Health, Safety & Environmental Incident Management			Page 4 of 10
Approved By M. Miller	Issue Date 01/01/2020	Revision Date	Revision Number 0	Document Number SED-CORP-HSE-2-027

- General liability incidents,
- Near misses, and
- Non-conformances with Silver Eagle Houston standards or procedures.

4.1.2 Silver Eagle Houston’s Injury Benefit Plan requires employees to report work-related injuries within 24 hours.

4.1.3 Employees involved in vehicle incidents will obtain from any other parties involved all information required for the Fleet Vehicle Incident Report, including the following information about the other driver:

- driver's license number,
- insurance carrier and policy number,
- name,
- address and
- telephone number.

Reports will also include the identity of any witnesses.

Note: Make statements at the scene only to the investigating officers. Do **not** make a statement to anyone else.

4.1.4 Supervisors will:

- Inform all employees under his/her direction to report all injuries and illnesses immediately;
- Arrange for any required drug and alcohol tests of employee(s) involved in the incident and any other employee(s) who may have contributed to the incident. Drug and alcohol tests should be conducted in accordance with Silver Eagle Houston’s Substance Abuse and Testing Standard and Procedure.

4.2 Managing Injuries or Illnesses


4.2.1 Except in cases of life-threatening injuries or conditions that require immediate medical intervention via 911, employees will report all work-related injuries and illnesses to the Emergency Call Center (ECC).

4.2.2 Upon receipt of the injury or illness report from the employee, the ECC will immediately send notification to the injury incident distribution list, maintained by the HSE Department, which includes HSE, HR, Silver Eagle Houston’s Medical Case Management (MCM) service provider & Line Management.


4.2.3 Medical Case Management (MCM)

4.2.3.1 Silver Eagle Houston’s MCM service provider will contact the reporting employee within thirty (30) minutes to:

- Ascertain the type and severity of injury or illness;

	Health, Safety & Environmental Incident Management			Page 5 of 10
Approved By M. Miller	Issue Date 01/01/2020	Revision Date	Revision Number 0	Document Number SED-CORP-HSE-2-027

- Perform basic medical triage protocol;
 - Determine whether employee requires professional care;
 - If injury cannot be managed by first aid only, complete and submit pre-authorization for treatment to medical clinic or ER ;
 - Provide any injury information directly to medical clinic or ER in advance of employee’s arrival; and
 - At the time of appointment, consult with medical professional regarding work release status (i.e. full duty, modified duty, lost time) – in accordance with specific job descriptions.
- 4.2.3.2 The HSE Department will contact employee and/or immediate supervisor within 45 minutes to:
- Ensure that MCM triage has occurred, and if not, will support triage process;
 - Ascertain the mechanism of injury or illness and any other pertinent details of the incident;
 - Direct any necessary evidence gathering for investigation;
 - Support other needs of employee or supervisor; and
 - Provide any necessary injury updates to line management, HR, and claims.
- 4.2.3.3 For incidents that occur between 6:00pm – 6:00am and if consultation with the MCM service provider does not occur within 30 minutes, injured employees and/or their supervisors are instructed to contact HSE directly for support
- 4.2.4 Post Professional Medical Treatment Incident Management
- 4.2.4.1 The MCM service provider will communicate directly with the affected employee to review work release status and treatment plans, as required (e.g., physical therapy, MRI, etc.)
- 4.2.4.2 The MCM service provider will provide a treatment / disposition / return to work email summary to the respective HR/HSE/Claims team (i.e., SED Distribution List attached)
- 4.2.4.3 Human Resources, the MCM service provider and HSE will collaborate to:
- Review the work release status (full duty, modified duty, lost time) to best determine the capacity at which the employee can return
 - In the event of a Modified Duty:
 - Ensure that agreed upon capacity is compliant to medical restrictions, within the specific job description, doesn’t create additional risk to employee or co-workers and is properly understood by and agreed to by line management;

	Health, Safety & Environmental Incident Management			Page 6 of 10
Approved By M. Miller	Issue Date 01/01/2020	Revision Date	Revision Number 0	Document Number SED-CORP-HSE-2-027

- Claims will ensure that Bona Fide Offer of Employment Letter correctly lists any existing medical restrictions and is distributed to injured employee for signature;
- Claims will ensure that Modified Duty notice is forwarded to payroll and benefits; both at beginning and conclusion of Modified Duty term; and
- The MCM service provider will be responsible for coordinating with the employee and respective Silver Eagle Houston personnel any follow-up appointments, adjusted work restrictions and final work release, including any appointments or treatment provided by specialists.
 - For treatment/appointments with referred specialists, the MCM service provider will send an updated treatment/disposition/return to work email summary to the respective HR/HSE/Claims team as soon as possible. Such email summary should include any documentation provided by medical professionals detailing treatment and work status.
 - For missed appointments/no shows, the MCM service provider will follow-up with employee to warn of consequences of noncompliance and reschedule new appointment.
- In the event of a Lost Time Injury or Illness:
 - Ensure that employee is engaged with benefits department for any qualified benefits (STD, etc.);
 - Claims to ensure that payroll is notified of employee status (both at the beginning and conclusion of lost time term); and
 - Ensure that any necessary return to work / fit for duty assessments are scheduled and completed.


4.2.5 OSHA Notification

OSHA requires certain work-related injuries be reported to them within specific time frames. Supervisors must notify the HSE Department immediately if any of these occur. The HSE Department will be responsible for any reports to OSHA.


- Within eight (8) hours after the death of any employee as a result of a work-related incident.
- Within twenty-four (24) hours after the in-patient hospitalization of one or more employees or an employee's amputation or an employee's loss of an eye, as a result of a work-related incident.

4.3 Investigating Incidents

4.3.1 Investigation is an important part of an effective HSE management system in that it determines the root cause and corrective actions necessary to prevent similar incidents or non-conformances.

	Health, Safety & Environmental Incident Management			Page 7 of 10
Approved By M. Miller	Issue Date 01/01/2020	Revision Date	Revision Number 0	Document Number SED-CORP-HSE-2-027

- 4.3.2 In the case of a major injury or incident, the scene of the event should be closed off and kept "as is" at the time of the incident. For all incidents, every effort must be made to preserve evidence. This is vital for effective incident investigation.
- 4.3.3 Incident investigations will be recorded and tracked until closure in Silver Eagle Houston's HSE performance management system.
- 4.3.4 Incident investigation will occur as soon as possible, while the facts are still fresh in the minds of those involved (i.e. witnesses). Interviews with all of those involved are to be conducted before they become unavailable or memory fades. An incident investigation must be thorough and concerned only with cause and prevention and must be separate from administrative disciplinary action.
- 4.3.5 Supervisors will participate in physical on-site incident investigations for all incident types. The physical site visit is not limited to Silver Eagle Houston property, but could involve customer property.
- 4.3.6 Evidence Collection
 - 4.3.6.1 Initial identification of evidence immediately following the incident may include a listing of people, equipment, and materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, and physical factors such as fatigue, age, and medical conditions. Evidence must be preserved, secured and collected through notes, photographs, witness statements, flagging, and impoundment of documents and equipment. All shall be dated.
 - 4.3.6.2 Equipment or vehicles directly involved in incidents will be subject to quarantine.
 - 4.3.6.3 Witness interviews and statements will be collected. Locating witnesses, ensuring unbiased testimony, obtaining appropriate interview locations, and use of trained interviewers are necessary. The need for follow-up interviews will also be addressed. All witness statements shall be dated.

	Health, Safety & Environmental Incident Management			Page 8 of 10
	Approved By M. Miller	Issue Date 01/01/2020	Revision Date	Revision Number 0

4.3.7 Incident Severity Ratings

All incidents shall be investigated, and the extent of such investigation shall reflect the severity of the incident. Incidents will be assigned a Severity Rating based upon the actual and potential consequences of the incident, as shown in the Incident Severity Rating Table.

	People	Environment	Asset	Reputation		
Consequence	1	No injury or health effect	No effect, primary containment effective	No damage	No impact	<input type="checkbox"/> Low
	2	Slight injury (First Aid) or health effect	No effect, secondary containment effective	<\$2,500	No Report to Regulator	<input type="checkbox"/> Low
	3	Minor injury (Recordable) or health effect	Short-term effect	>\$2,500	No / Minor Public Impact	<input type="checkbox"/> Medium
	4	Severe injury (LTI) or multiple minor injuries	Moderate-term effect	>\$25,000	Local Impact	<input type="checkbox"/> Medium
	5	Permanent disability, death, or severe injury	Widespread medium to long-term effect	>\$100,000	Regional Impact	<input type="checkbox"/> High
	6	Multiple deaths or permanent disabilities	Permanent widespread effect	>\$250,000	National Impact	<input type="checkbox"/> High


4.4 Root Cause Analysis

4.4.1 At the discretion of the HSE Department and dependent upon the severity or likelihood of reoccurrence of the incident, an in-depth root cause analysis may be performed as part of the incident investigation.

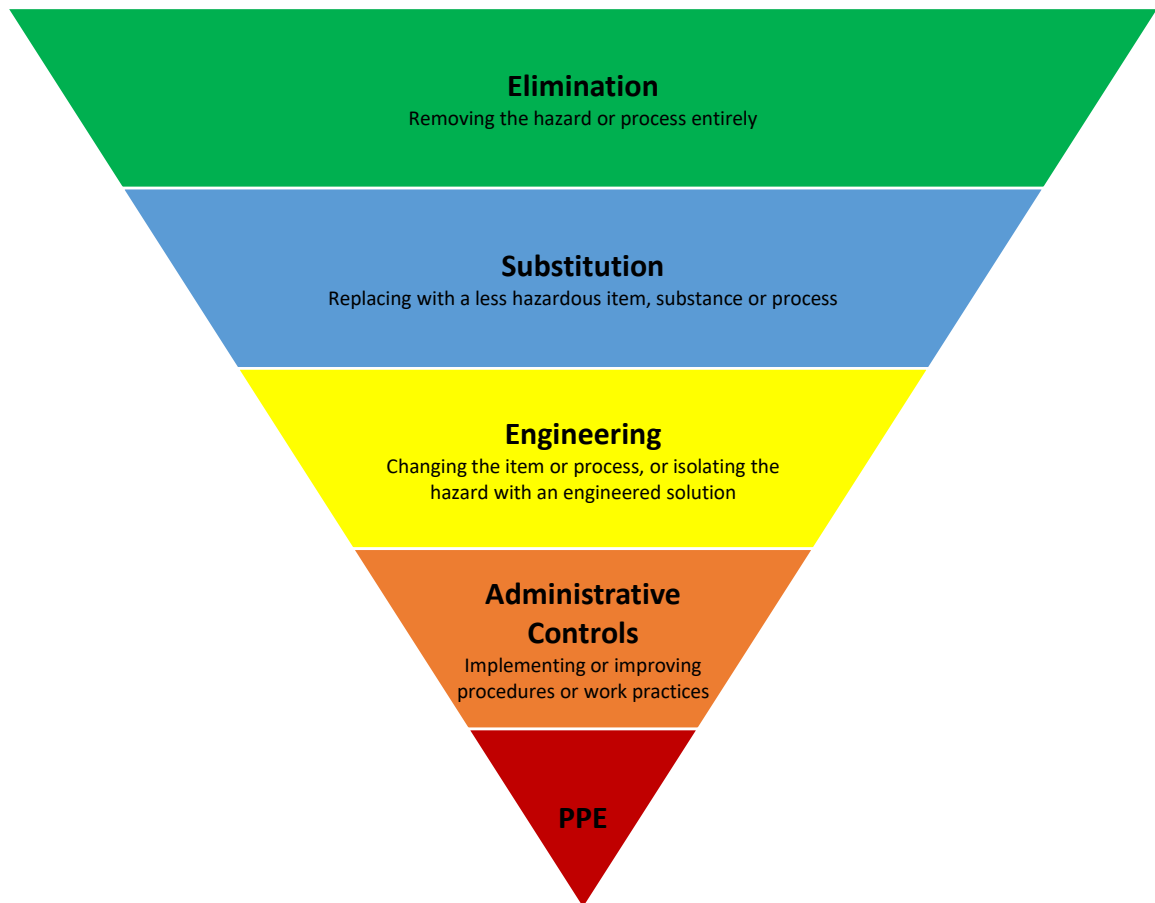
4.4.2 The HSE Department will perform the root cause analysis with support from supervisors and internal subject matter experts, as needed.

4.5 Corrective Actions

4.5.1 All incident investigations will result in at least one corrective action.

	Health, Safety & Environmental Incident Management			Page 9 of 10
	Approved By M. Miller	Issue Date 01/01/2020	Revision Date	Revision Number 0

4.5.2 Corrective actions shall be developed in consideration of the hierarchy of control below. Corrective actions that fall under categories at or near the top of the hierarchy generally have the most long-term effectiveness. Those near the bottom of the hierarchy are generally the least effective.



4.5.3 Based upon their job duties, individuals may be assigned responsibilities relative to corrective actions.

4.5.4 Assigned and completed corrective actions will be documented. The assigned person responsible for making the corrections will communicate to the investigator and/or HSE Department that the assigned corrective action has been made and the completion date will be noted within the investigation record.

4.5.5 Corrective actions may also involve revisions to operational procedures and the Silver Eagle Houston HSE management system.

4.6 HSE Performance Data

4.6.1 The HSE Department maintains all HSE performance information for Silver Eagle Houston. Performance reports will be generated by the HSE Department and provided to the branches or other departments for review, monthly, quarterly, annually and upon request. When

	Health, Safety & Environmental Incident Management			Page 10 of 10
	Approved By M. Miller	Issue Date 01/01/2020	Revision Date	Revision Number 0

external organizations require such statistical information, the HSE Department will release the required information.

- 4.6.2 The HSE Department will also maintain all Injury and Illness Logs and generate Annual Summaries, as required by OSHA recordkeeping regulation 29 CFR 1904 – Subpart D.
- 4.6.3 All Injury and Illness Logs, Annual Summaries and initial incident report documents will be retained for a period of no less than five years.

5 Training

Depending on their role in the process, employees will be trained in their roles and responsibilities for incident response and incident investigation techniques. Training shall occur prior to responsibilities to response or investigation duties are assigned. Training frequency will be based on the specific area of responsibility. Training requirements relative to incident investigation and reporting may include:

- The initial investigation at the incident scene,
- Leading the incident investigation,
- Collecting and analyzing evidence,
- Root Cause Analysis techniques, and
- Developing corrective actions.

6 References

Substance Abuse and Testing Standard - SED-CORP-HSE-02-005
 Substance Abuse and Testing Procedure - SED-CORP-HSE-03-001
 OSHA 29 CFR 1904 – Subpart C
 OSHA 29 CFR 1904 – Subpart D
 OSHA 29 CFR 1904 – Subpart E

7 Document Revision Register

Revision #	Section #	Date	Revision Description
0		01/01/2020	Initial Issue