

THIRD-PARTY HSEC INCIDENT REPORTING & INVESTIGATION GUIDELINES

IMPALA TERMINALS



➤ INTRODUCTION

1.1. PURPOSE

Impala Terminals requires that serious Health, Safety, Environmental and Community (HSEC) work-related incidents associated with our business are reported and appropriately investigated. By building a clear view of the HSEC risks faced by our employees and by third-parties engaged in support of Impala Terminals' business we will be better placed to manage our shared impacts.

This document aims to provide Impala Terminals' partners actively involved in support of our business with clear guidance on how to:

- i) Report to Impala Terminals in the event of a serious incident and;
- ii) Carry-out incident investigations with a view to mitigating against future incidents.

The participation of third-parties in this exercise is strongly encouraged. Data obtained from third-party incidents and investigations will be used to inform and manage Impala Terminals' HSEC risks on a global basis.

Should you have any questions about the approach presented in this document please contact your existing contact point at Impala Terminals accordingly or alternatively email HSEC@impalaterminals.com.

For further information on Impala's HSEC Policy and Business Principles please refer to Impalaterminals.com.

1.2. SCOPE

All third-parties engaged directly or indirectly by Impala Terminals are encouraged to report against these guidelines.

Impala Terminals defines an incident as a single event or continuous/repetitive series of events that results in, or could have resulted in, one or more of the following impacts:

- Injury or illness;
- Damage to the environment;
- Damage to physical assets (e.g. product, buildings, plant and equipment);
- Disruption to a community;
- Exposure to legal liability;
- Security threat.

Third-parties are to report work-related incidents and near-misses where they are either of "Level 3", "Level 4" or "Level 5" in seriousness (see Section 1.5) and where they meet the definitions as provided (see Appendix 1).

1.3. REGULATORY REPORTABLE INCIDENTS

Impala Terminals' reporting guidelines do not supersede local or national regulatory incident reporting requirements or absolve third-parties associated with our business from reporting within designated timescales.

1.4. WHEN TO REPORT

Impala Terminals requires that third-parties provide an initial alert to their nominated contact within Impala Terminals within 4 hours of an incident occurring. Third-parties are not expected to submit a formal incident investigation as part of this alert.

1.5. WHAT TO REPORT

The following guidelines are designed to enable third-parties to assess the seriousness of HSEC incidents. While third-parties are encouraged to report "Level 3", "Level 4" or "Level 5" incidents and near misses, the company also welcomes the reporting of lower level incidents and near misses i.e. "Level 1 and Level 2".

If in any doubt as to the seriousness of an incident, third-parties are encouraged to contact Impala Terminals immediately.



CATEGORY	LEVEL 1 LOW	LEVEL 2 MINOR	LEVEL 3 MODERATE	LEVEL 4 MAJOR	LEVEL 5 CRITICAL
INJURY AND ILLNESS	<ul style="list-style-type: none"> • First aid treatment. • Short term subjective inconvenience. • No lost time or modified duties. 	<ul style="list-style-type: none"> • Medical treatment case or restricted work duties. • Objective but reversible disability/impairment. • Illness or injury results in restricted/modified duties • Potential breach of health and safety legislation. 	<ul style="list-style-type: none"> • Lost Time Incident injury. • Moderate irreversible disability or impairment to one or more persons. • Clear breach of health and safety legislation. 	<ul style="list-style-type: none"> • Single fatality. • Severe irreversible disability or impairment to one or more persons. • In-patient hospitalisation equal to or more than 3 people and equal to or less than 9 persons. 	<ul style="list-style-type: none"> • Multiple fatalities. • Significant irreversible human health effects or hospitalisation of more than or equal to 10 people.
ENVIRONMENTAL EFFECTS	<ul style="list-style-type: none"> • No permanent impact on biological or physical environment. • Hydrocarbon spill¹ of less than 1 barrel (BBL). • Volume of metal, metal concentrate or bulk material spilled less than 1 tonne. • Limited damage to minimal area of low significance e.g. hydrocarbon spill largely contained on deck of vessel or at loading rack. • No permanent impact on biological or physical environment. 	<ul style="list-style-type: none"> • Hydrocarbon spill of more than 1 BBL less than 7 BBLs (1 tonne). • Small volume of metal, metal concentrate or bulk material spilled e.g. more than 1 tonne less than 5 tonnes. • Minor effects on biological or physical environment. • Minor short-term damage to small area of limited significance. • Some limited clean-up required within boundaries of local legislation. • Potential breach of environmental legislation. 	<ul style="list-style-type: none"> • Hydrocarbon spill of more than 7 BBLs less than 51 BBLs (more than 1 tonne less than 7 tonnes). • Large volume of metal, metal concentrate or bulk material spilled e.g. more than 5 tonnes less than 25 tonnes (1 truck load). • Moderate short-term widespread impacts on biological or physical environment but not affecting ecosystem function. • Clear breach of environmental legislation. 	<ul style="list-style-type: none"> • Hydrocarbon spill of more than 51 BBLs less than 5,110 BBLs (more than 7 less than 700 tonnes). • Serious environmental effects with impairment of ecosystem function or relatively widespread long-term impacts, irrespective of product volume lost. • Significant clean up required. 	<ul style="list-style-type: none"> • Hydrocarbon spill of over 700 tonnes or 5,110 BBLs. Long-term, widespread effects on significant (i.e. protected) ecosystem, irrespective of product volume lost. • Impact on nationally or internationally recognised protected environment. • Major clean-up/intervention programme required.
SOCIAL AND COMMUNITY ISSUES	<ul style="list-style-type: none"> • An isolated point of negative feedback from an individual. • No lasting social or cultural impact. 	<ul style="list-style-type: none"> • Negative feedback from more than 1 individual. Concern limited to the local community. • Adverse local media or NGO attention. • Minor infringement of cultural heritage. 	<ul style="list-style-type: none"> • Repeated, on-going negative feedback. • Significant infringement of cultural heritage. • Adverse national media or national NGO attention. Breach of social/community related law/company policy. 	<ul style="list-style-type: none"> • One fatality to member of the public • On-going significant negative community feedback or human rights impacts. • Significant damage to items of cultural significance. • Significant infringement and disregard of cultural heritage. • Adverse international media or NGO attention. 	<ul style="list-style-type: none"> • More than 1 fatality to member of the public Reputation severely tarnished, license to operate under threat. • Repeated widespread grievance(s) related to serious negative feedback or human rights impacts. Irreparable damage to highly valued items/property of cultural significance. • Highly offensive infringements of cultural heritage.
FINANCIAL COST²	<ul style="list-style-type: none"> • Less than or equivalent to US\$5,000. 	<ul style="list-style-type: none"> • Between US\$5,001 and US\$50,000. 	<ul style="list-style-type: none"> • Between US\$50,001 and US\$500,000. 	<ul style="list-style-type: none"> • Between US\$500,001 and US\$5 million. 	<ul style="list-style-type: none"> • More than US\$5 million.

1 NB. Gross volume spilled not residual or 'effective' volume remaining in environment following recovery efforts.

2 Financial cost of the HSEC incident with an impact leading to losses, material damages or business interruption of the following financial values



➤ INCIDENT INVESTIGATIONS

2.1. INCIDENT INVESTIGATION APPROACH

The following guidelines provide a recommended template for use by third-parties.

Impala Terminals encourages all third-parties to conduct investigations against "Level 3", "Level 4" or "Level 5" incidents.

Impala Terminals may request information in relation to an incident in order to seek assurance that incidents are adequately investigated and that appropriate measures have been taken to mitigate against a repeat of the incident taking place in future.

2.2. RESPONSIBILITY

The responsibility for an investigation by a third-party should be handled by an "Investigation Lead". The Investigation Lead is to be technically competent to undertake the investigation, or have the appropriate technically competent resources made available to them.

The Investigation Lead is responsible for undertaking a causal analysis and identifying corrective actions required associated with each incident.

2.3. RECOMMENDED PROCESS

Incidents do not just happen, they are caused. The key to the investigation process is to determine the root cause of the incident. The investigation process adopted by the third-party shall include the following steps as a minimum:

Information gathering

- What happened, under what conditions and as a result of what actions – examine the sequence of events that led up to the incident.
- Obtain information - physical (scene of incident), verbal (accounts of witnesses), written (photos, documents, drawings, risk assessments, procedures, etc.).

Causal analysis

- Review of information obtained to determine the underlying or root causes. May involve application of formal method of analysis (e.g. event and causal factor analysis).
- Analysis should be methodical, thorough, open and transparent.
- Identification of suitable risk control measures

- Determine what risk control measures were missing or inadequate and are needed to prevent future actions.

Development and implementation of an action plan

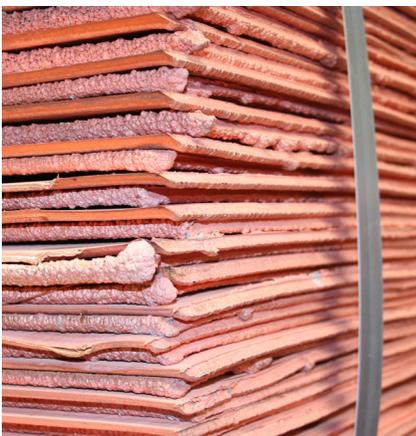
- Provide an action plan that deals with the immediate and root causes of the incident.

Reporting

- The investigation report shall constitute an accurate and objective record of the incident.

Corrective Actions

- As part of the incident investigation, corrective actions shall be identified and reported, appropriate to the nature and classification level of the incident. Corrective actions shall both address any need to remediate the impact of an incident and prevent reoccurrence, specifically through addressing root cause.



APPENDIX 1

DEFINITIONS

FATALITY

A work-related injury resulting in the immediate or consequential death of a person (for example, an employee, contractors or member of the public).

INCIDENT

A single event or continuous/repetitive series of events that results in, or could have resulted in, one or more of the following impacts:

- Injury or illness;
- Damage to the environment;
- Damage to physical assets (e.g. product, buildings, plant and equipment);
- Disruption to a community;
- Exposure to legal liability;
- Security threat.

LOST TIME INCIDENT (LTI)

An incident that resulted in time lost from work amounting to at least one day (or shift) in duration. An LTI is only recorded when a work related injury or illness results in the individual being deemed fully unfit for work for a period of an entire work shift any time after the day or shift on which the injury or illness occurred – e.g. they are unable to attend work on the next scheduled working day after the injury.

MEDICALLY TREATED INJURY

A work related injury which results in the individual receiving treatment from a qualified medical practitioner which could not have been provided by a qualified first aider. This includes but is not limited to the provision of sutures and prescribed medication.

NEAR-MISS

An incident where no ill health, injury, damage or other loss occurs is referred to as a 'near-miss'. While not causing harm, a near-miss has the potential to cause injury or ill health, damage to the environment, damage to physical assets or disruption to a community. This includes unsafe acts and unsafe conditions.



For more information please contact:
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In this publication, the terms "Impala", "the company", "the group", "we", "us" and "our" are used for convenience to denote Impala group and/or one of its subsidiaries. These terms are used where no useful purpose is served by identifying a specific company or entity in the Impala group.

BE VIGILANT
THINK SAFETY

OUR EMPLOYEES AND PARTNERS DESERVE THE BEST IN SAFETY STANDARDS



REPORT
ALL INCIDENTS