

BACHMAN MACHINE COMPANY CORPORATE POLICY

Effective Date: 01-01-2000 Supersedes Policy No _____ Date: _____

SUBJECT: ACCIDENT INVESTIGATION

Objective: The objective of this policy is to establish a guideline for (1) the investigation or review of any accident or work related illness, near miss or actual situation, (2) to suggest or implement a corrective action to prevent future reoccurrence,(3) to determine the real or underlying cause or causes of the loss of producing incident. This is not and insurance or OSHA oriented activity, but is a Bachman Machine Company procedure to prevent repeated accident/illnesses from the same or similar causes.

Scope: This policy applies to all locations of the Bachman Machine Company and subsidiary operations.

Policy Statement: An accident is the unplanned occasional, but not unforeseeable, consequence of one or more unsafe acts in combination with hazardous circumstances. The purpose of the accident/illness investigation is to assemble such facts as will lead to a solution of the problem brought to light by the accident/illness. It is the policy of Bachman Machine Company to thoroughly investigate each and every work related illness or accident and near miss situations or incidents that results in the following:

1. Any near miss; no physical loss, but has/had the potential for serious harm to our employees in future operations.
2. Equipment, property, or any material loss or damages that reveals a noticeable loss in productivity.
3. First aid care only, but the injury or illness has the potential for greater damage or is part of a series of minor injuries/illnesses that indicate a problem.
4. Any recordable or lost time injury/illness.

All of these are to be investigated by the immediate supervisor having the responsibility over the employee, equipment, or area involved. **There will be no transferring of this responsibility!** However, from time to time, the Manager of

Human Resources will participate in the investigation and/or conduct a subsequent investigation process on those injuries/illnesses resulting in a lost time injury/illness or a serious loss of productivity.

Routine Incidents or near miss situations: A copy of each investigation report should be routed to the Manager of Human Resources who will review and recommend any disposition with the Bachman Machine Company Safety Committee. The Human Resource Manager will keep an open file on these reports until the situation is resolved.

Generally, routine situations can and should be resolved by the supervisor through the Supervisor of the Maintenance Department or by making the corrective actions using the departments own personnel.

Serious Incidents: In cases of serious lost time, multiple injury, death, serious property damage, and/or a significant loss of productivity, the Manager of Human Resources **will** participate in the investigation.

Supervisor's Investigation: Finding out why an accident/illness happened leads directly into a solution for the interruption. The quality of the solution, thus, depends upon the quality of the investigation. In the questioning and observing stage of the investigation, a supervisor should keep in mind the following:

- Avoid the suggestion of blame in order not to put any person being questioned on the defense.
- Keep in mind that the person being questioned may be concealing or be unaware of the facts, fail to tell the whole truth, or make untrue statements as to what he/she “thinks” what happened.
- Try not to use or ask leading questions.
- Test what is being said by considering all of the circumstantial evidence available and by using common sense.

Accident Investigation Report (Form FHR 46, See Attached) Through the timely and complete investigation of all accidents, near misses, injuries and illnesses, Bachman Machine Company will obtain valuable information to assist in preventing the occurrence of factors that contribute or cause the accident, near miss, injury or illness. Accident investigation Reports are also essential for the completion of required OSHA injury logs, medical treatment and worker's compensation information.

The Form FHR 46 is designed to provide the Company with all the information needed in processing claims, identifying needed corrective action and providing other safety related information. The accident investigation report will be completed by the responsible supervisor **WITHIN TWENTY-FOUR HOURS** of the incident. The written report will be completed on Form FHR 46. The form is self-explanatory and all areas of the report are to be completed, leave no areas blank. Incomplete reports will be returned to the supervisor for immediate and proper completion

Effect: The value of an accident reporting system and the accident investigation form can only be realized when the practical and effective means of preventing a reoccurrence of the accident/illness, or of the injury damage that resulted from it, have been found and put into effect wherever a similar exposure exists.

The effect of this policy shall be to:

- Establish the guidelines for the use of the accident investigation form in cases of work related injury/illnesses, accidents, near miss situations, and property damage.
- Identify the underlying cause (s) of work related injuries/illnesses for the purpose of making necessary corrective actions to prevent future reoccurrence of the same or similar causes.
- Provide the company with the proper details and information needed to comply with OSHA and other regulated safety programs.
- Assign responsibility within the Company to initiate and complete the accident investigation form.