



## STANDARD PROCEDURE INSTRUCTION

Title		SPI
High Potential Incident Reporting (HiPo or HPI)		#34-55
Department	Supersedes SPI Dated	Effective Date
Safety, Health and Environment	<b>New</b>	August 1. 2017

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### HIGH POTENTIAL INCIDENT REPORTING

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Title		SPI #
Department <b>Safety, Health and Environment</b>	Supersedes SPI Dated	Effective Date

## 1. PURPOSE

To share relevant information that will assist in preventing reoccurrence

## 2. REFERENCES

PRO-001-BM-HSE Incident Reporting procedure (Annex 03 & 07)  
 PRO-002-BM-HSC Legal Non-Conformities and Regulatory Activities Reporting procedure  
 PRO-003-BM Crisis Management procedure  
 SPI 34-29 Advanced Safety Investigation  
 SPI 34-31 Incident Investigation  
 MB OPS HiPo Report Guidance Presentation  
 MB OPS HiPo Report Template  
 SAP Incident Management (IM) System (including the Severity Categorization)

## 3. SCOPE

This procedure applies to all Vale Manitoba operations and projects, where Vale is the operator and includes additional reporting requirements of incidents directly related to Health, Safety and Environment events as outlined within, where the Actual severity is Serious, Critical or Catastrophic or Potential severity is Critical or Catastrophic.

This procedure applies the severity categorization defined in the SAP Incident Management (IM) system.

## 4. PROCESS

This procedure provides the process for communications within the Manitoba Operations and ensures the reporting requirements of Base Metals HSE corporate are met.



Title		SPI #
Department <b>Safety, Health and Environment</b>	Supersedes SPI Dated	Effective Date

Regardless of severity, all actual incidents, near-misses and unsafe conditions, as well as all high potential incidents, must be recorded in the SAP IM system. Incidents may include any of the following;

- **A Personal Incident:** An incident that resulted in actual personal harm, including injury, disease or other disorder of body functions or systems.
- **An Environmental Incident:** An incident that resulted in an adverse environmental impact.
- **A Material Incident:** An incident that resulted in material damage.
- **A Near Miss:** An incident that did not result in personal, environmental or material loss, but given a slight shift in time, position or performance of the controls could have resulted in a loss.

Actual Serious, Critical or Catastrophic incidents, as well as High Potential Incidents (Potential Critical or Catastrophic) must be reported according to the requirements described in this procedure. This communication provides a learning opportunity for other operating areas to identify hazards, implement controls and reduce the chances of a similar occurrence.

## 5. REPORTING OBLIGATIONS

### 5.1 Reporting Obligations for Actual Critical or Catastrophic Incidents

#### 5.1.1 Initial Notification – 1 business day

An Actual Critical or Catastrophic incident must be reported, by the Vice President of Manitoba Operations or their designate, to the Chief Executive Officer (Base Metals Executive Director), the Director - Legal & Sustainability Base Metals and the Base Metals H&S Manager within one business day of the event. This communication can be done via email or telephone.

This communication is the accountability of the Operational Site/Project Director and may be delegated, as appropriate, by the Director.

#### 5.1.2 Formal Notification – 2 business days

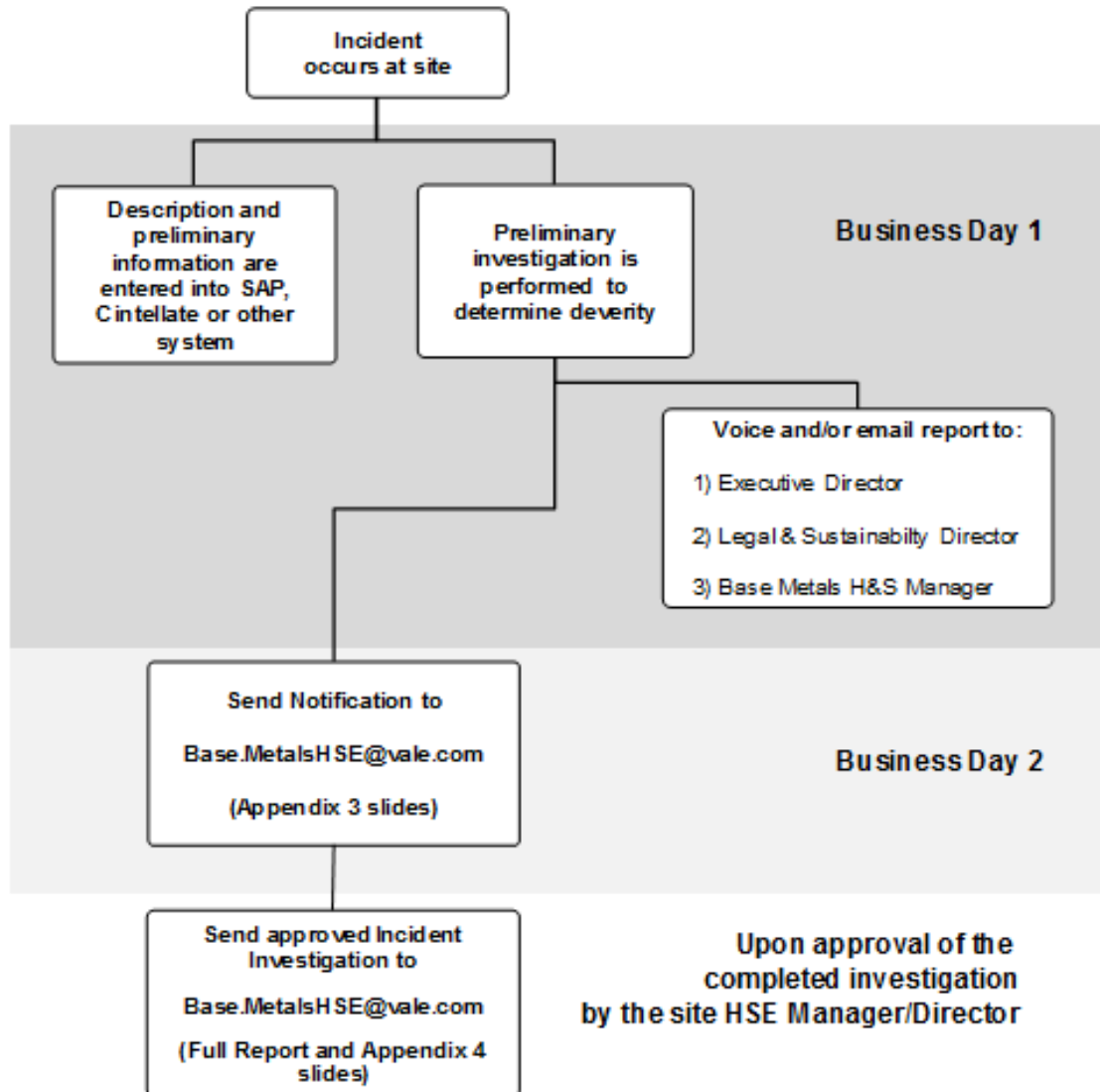
Complete the Incident Notification Presentation (HSE HiPo Notification Report) and send to Base.MetalsHSE@vale.com within 2 business days of the incident.



Title		SPI #
Department	Supersedes SPI Dated	Effective Date
<b>Safety, Health and Environment</b>		

### 5.1.3 Significant Incident Investigation – Upon Site Approval

Provide the investigation summary slides (HSE HiPo Investigation Report) and final report, complete with action items list, to Base.MetalsHSE@vale.com as soon as the investigation is completed and site approval has been provided.



Title		SPI #
Department	Supersedes SPI Dated	Effective Date
<b>Safety, Health and Environment</b>		

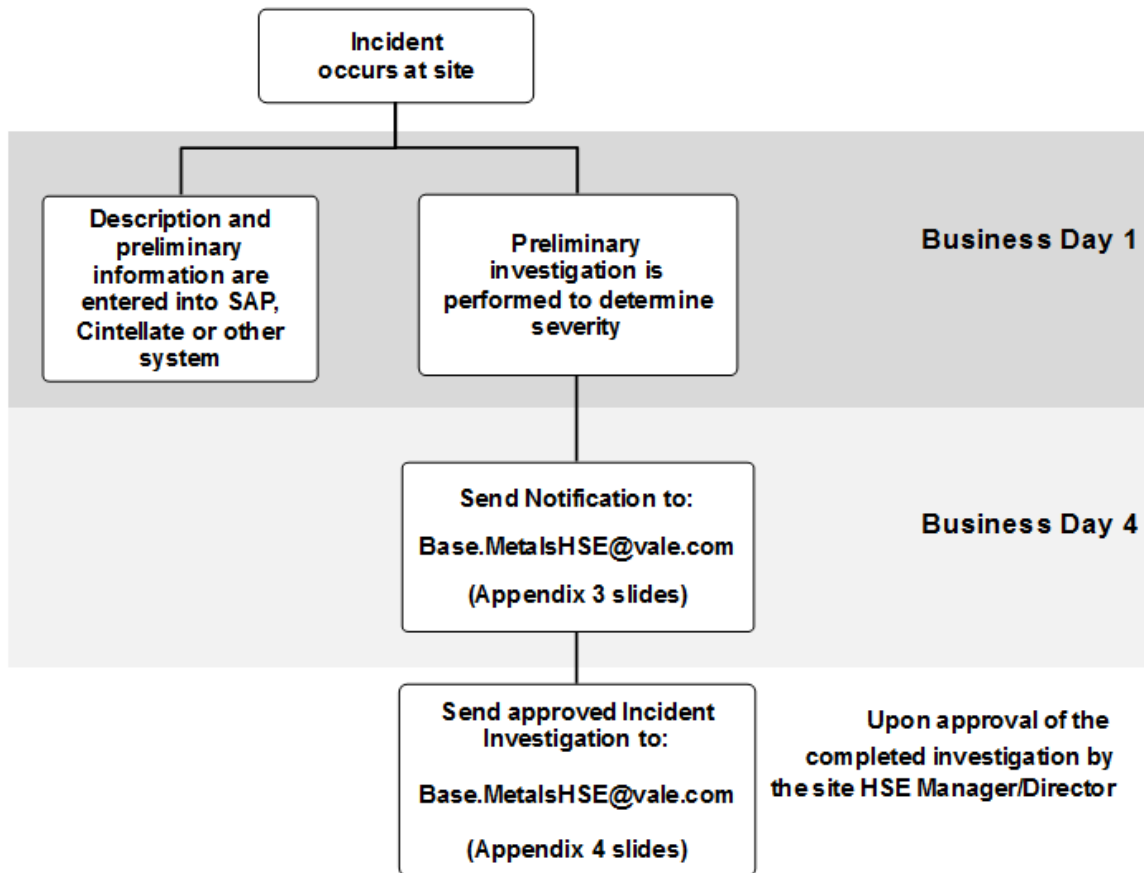
## 5.2 Reporting Obligations for Actual Serious Incidents

### 5.2.1 Formal Notification – 4 business days

Complete the Incident Notification Presentation (HSE HiPo Notification Report) and send to Base.MetalsHSE@vale.com within 4 business days of the incident.

### 5.2.2 Incident Investigation (Standard or Significant Investigation) – Upon Site Approval

Provide the investigation summary slides (HSE HiPo Investigation Report), complete with action items list, to Base.MetalsHSE@vale.com as soon as the investigation is complete and site approval has been provided.



Title		SPI #
Department <b>Safety, Health and Environment</b>	Supersedes SPI Dated	Effective Date

### 5.3 Reporting Obligations for High Potential Incidents

#### 5.3.1 Formal Notification – 4 business days

Complete the Incident Notification Presentation (HSE HiPo Notification Report) and send to Base.MetalsHSE@vale.com within 4 business days of the incident.

#### 5.3.2 Incident Investigation (Standard or Significant Incident) – Upon Site Approval

Provide the investigation summary slides (HSE HiPo Investigation Report), complete with action items list, to Base.MetalsHSE@vale.com as soon as the investigation is complete and site approval has been provided.

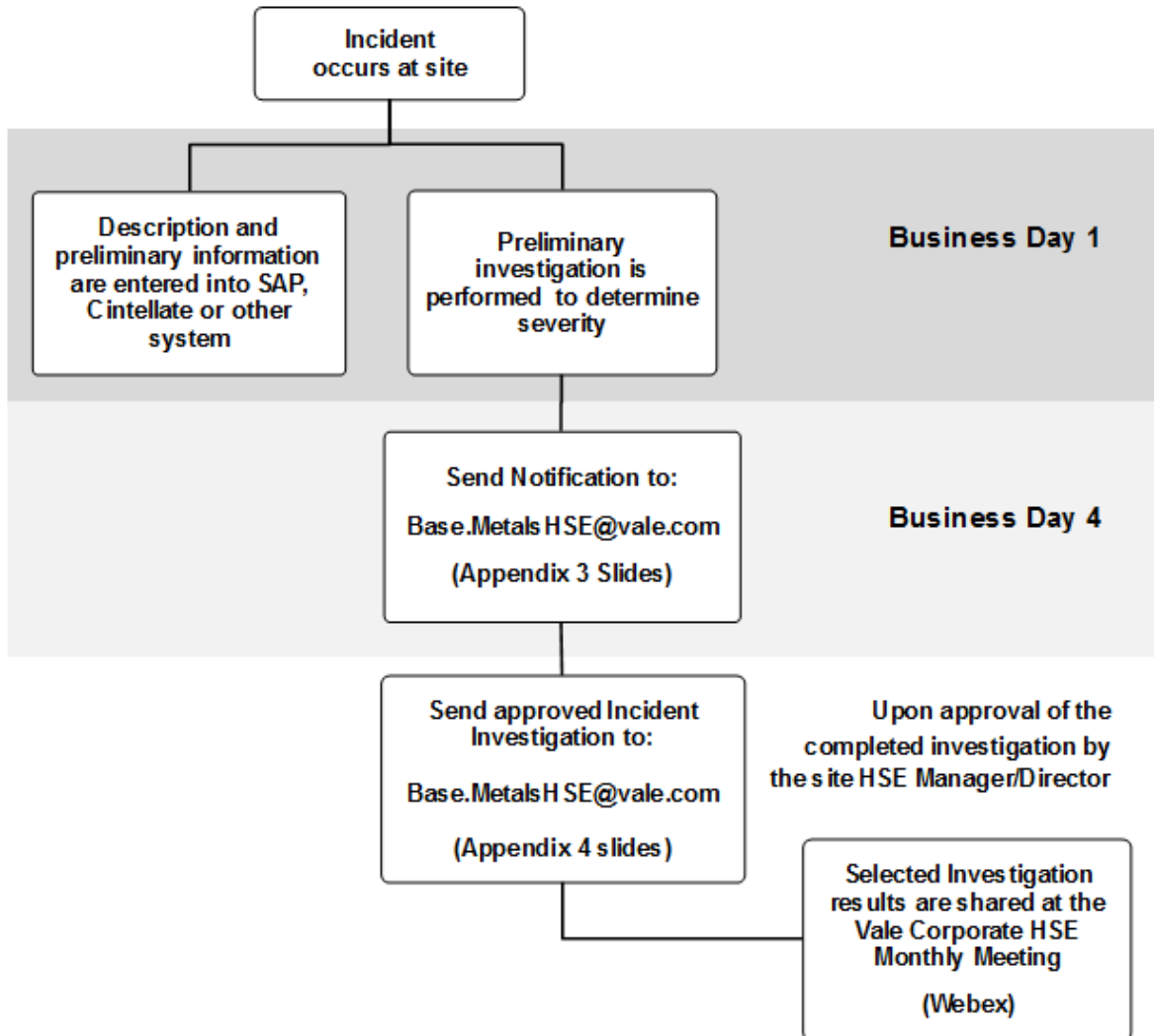
#### 5.3.3 Presentation at Vale Corporate HSE Monthly Meeting

A designated site Health and Safety or operations representative may be invited to participate on the Vale Corporate Monthly Health and Safety meeting (Webex) to present the high potential incident and analysis (investigation). The meeting provides a forum for sharing and learning.

A flowchart of the Base Metals reporting requirements for High Potential incidents is included on following page.



Title		SPI #
Department	Supersedes SPI Dated	Effective Date
<b>Safety, Health and Environment</b>		



## 6. EXPECTATIONS

### 6.1 Supervisors are expected to:

- Enter incident into SAP IM on the date of the incident, whenever possible, and by the next working day at the latest.



Title		SPI #
Department <b>Safety, Health and Environment</b>	Supersedes SPI Dated	Effective Date

- Properly classify the **Actual** and **Potential** severity of the incident upon initial IM entry and include employee(s) involved whenever possible. DO NOT underestimate the severity.
- Escalate any incident, where the Actual or Potential severity meets the criteria outlined within this procedure, to department management or plant management on call.

**6.2 Superintendents (or their designate) are expected to:**

- Initiate HiPo Report document when made aware of incident that meets the criteria outlined in this procedure.
- Review Nightletter and SAP IMs generated from previous shift to determine:
  - That Actual and Potential severity is being entered by their direct reports when initially generating IMs,
  - That severity is being properly assessed and not underestimated.
  - Initiate HiPo Report document for any incident identified during review of Nightletter and SAP IM that meets the criteria outlined in this procedure.
- Submit completed HiPo Report document to the plant Manager for their review and approval.

**6.3 Managers (or their designate) are expected to:**

- Provide direction to all direct reports that severity must be properly classified by supervisors upon initial IM entry and audited by superintendents in order to:
  - Ensure Actual and Potential severity is properly assessed following an incident,
  - Ensure superintendents enforce the expectation that severity is properly assessed and escalated when applicable.
- Ensure that HiPo Report documents are generated for all incidents meeting the criteria outlined in this procedure within the Base Metals HSE corporate reporting timelines.
- Review all HiPo Report documents for accuracy and forward approved copy to general manager for approval.

**6.4 Directors (formerly GMs) are required to:**

- Set the expectations for their respective department managers that HiPo Report documents must be completed for all incidents that meet the criteria outlined in this procedure.
- Review all HiPo Report documents submitted by managers and forward approved copy to STHE manager for final review.
- Provide assistance in understanding why their department(s) have decided not to report an incident as High Potential.





Title		SPI #
Department <b>Safety, Health and Environment</b>	Supersedes SPI Dated	Effective Date

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**6.5 Vice President (or designate) is required to:**

- Set the expectations for general managers that HiPo Report documents must be completed for all incidents that meet the criteria outlined in this procedure.
- Review all HiPo Report documents submitted by general managers and forward approved copy to senior supervisor SafeProduction for distribution throughout Manitoba Operations.
- Provide assistance in understanding why a department has decided not to report an incident as High Potential.
- Forward all approved HiPo documents to Base Metals.

**6.6 STHE Manager (or designate) will:**

- Facilitate a daily review of Night Letter to determine if actual and potential severity is being properly assessed and when not, to make requests of manager(s) to consider reporting to meet Base Metals HSE corporate requirements.
- Be a resource for the HiPo reporting process.
- Review all HiPo Report documents forwarded by area directors to ensure alignment with the criteria set out in this procedure and with Base Metals HSE corporate requirements prior to sending to vice president for final approval for local distribution and forwarding to Base Metals.

**6.7 Safety Facilitators are required to:**

- Initiate conversation of the requirement based on daily Night Letter reviews and actual events.
- Coach the line organization in properly assessing severity of incidents.
- Provide guidance and assistance to line organization on proper completion of HiPo Report documents.
- Review all HiPo Report documents completed in their departments to ensure alignment with the criteria set out in this procedure and with Base Metals HSE corporate requirements prior to department manager forwarding to area director.



Title		SPI #
Department <b>Safety, Health and Environment</b>	Supersedes SPI Dated	Effective Date

## 7. REPORTING TYPES AND TEMPLATE

### 7.1 REPORT TYPES

For all work-related personal, environment and incidents in controlled activities including near misses and material incidents, the template shown in 7.2 is to be used. All applicable slides are to be completed as outlined in the MB OPS HiPo Report Guidance Presentation, following all instructions within the text boxes and speakers notes.

#### 7.1.1 NOTIFICATION REPORT

Slides 1 & 2 are to be used for both the Notification Report and Incident Investigation Analysis Report.

#### 7.1.2 INCIDENT INVESTIGATION ANALYSIS REPORT

All Slides are to be used when submitting the Complete Analysis report for conveying all applicable information.






Title		SPI #
Department <b>Safety, Health and Environment</b>	Supersedes SPI Dated	Effective Date

**SLIDE 2** – To be used in both the Notification Report and Incident Investigation Analysis Report if additional pictures are required to provide a better understanding of the incident scenario, scaling to fit the rectangle(s) without stretching them.

**CRITICAL/CATASTROPHIC POTENTIAL INCIDENT**

BASE METALS / MANITOBA OPERATIONS / PLANT NAME



<p>Place one (01) image in this space. Avoid stretching the picture to fit the full box.</p>	<p>Place one (01) image in this space. Avoid stretching the picture to fit the full box.</p>
Description	Description
<p>Place one (01) image in this space. Avoid stretching the picture to fit the full box.</p>	<p>Place one (01) image in this space. Avoid stretching the picture to fit the full box.</p>
Description	Description


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Title		SPI #
Department <b>Safety, Health and Environment</b>	Supersedes SPI Dated	Effective Date

**SLIDE 3** - This slide is optional. Use it only when there are relevant sketches or schematic illustrations that might help the understanding of the incident. This slide can be replicated as many times as necessary.

**CRITICAL/CATASTROPHIC POTENTIAL INCIDENT**  
BASE METALS / MANITOBA OPERATIONS / PLANT NAME



**REENACTMENT OF INCIDENT / SKETCHES OF INCIDENT LOCATION**

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Title		SPI #
Department <b>Safety, Health and Environment</b>	Supersedes SPI Dated	Effective Date

**SLIDE 4** - Use this slide to complement the analysis with relevant information that has not been covered in previous slides. This slide can be replicated as many times as necessary. The use of this slide is optional.

**CRITICAL/CATASTROPHIC POTENTIAL INCIDENT**

BASE METALS / MANITOBA OPERATIONS / PLANT NAME



**ADDITIONAL INFORMATION**

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Title		SPI #
Department <b>Safety, Health and Environment</b>	Supersedes SPI Dated	Effective Date











**SLIDE 5** – This slide is optional. Use if there was one or more Golden Rules that were not followed. List and explain them.

## Golden Rules

Golden Rule ## was not being followed. Explain...

### Golden Rules: Vale's Base Metals Business

- 
**1: The Fundamental Requirements**  
 Only perform work that you are trained, qualified, authorized and fit to perform.
- 
**2: Working at Heights**  
 Where there is a hazard of falling 1.5 metres or more, approved, maintained and certified equipment for fall arrest and travel restraint must be used.
- 
**3: Mobile Equipment and Light Vehicles**  
 Always use mobile equipment and light vehicles for the purpose they were designed for and adhere to site pedestrian/vehicle traffic rules.
- 
**4: Energy and Machinery Isolation**  
 Only work on equipment if all energy sources have been identified, tagged appropriately, locked with your personal lock and tested to ensure that they are at a zero energy state.
- 
**5: Lifting and Mechanical Handling**  
 Always use authorized, maintained, appropriate and certified lifting devices capable of lifting a load in a controlled manner and safeguard against encroachment under suspended loads by pedestrians and mobile equipment.
- 
**6: Confined Space**  
 Only enter a confined space if you are trained, qualified and authorized and after having reviewed the permit.
- 
**7: Surface and Underground Mining**  
 Only enter areas you are authorized to be in.
- 
**8: Equipment Protection**  
 Only trained and qualified personnel may alter equipment safeguards after having received authorization.
- 
**9: Chemicals and Hazardous Substances**  
 Only handle hazardous substances in accordance with prescribed controls.
- 
**10: Management of Change**  
 Always conduct a management of change assessment before implementing any temporary or permanent change (process, equipment or facility).



Title		SPI #
Department <b>Safety, Health and Environment</b>	Supersedes SPI Dated	Effective Date


**SLIDE 6** – This information will come from the IM associated to the incident in the ANALYSIS tab in the CONTRIBUTING FACTORS step.

**GROUP: Behavior, Condition, Personal Factor, System/Work Factor** related to the contributing factor being described.

**CONTRIBUTING FACTOR:** These will be the sub bullets located within each of the IM GROUP option listed above.

**DESCRIPTION OF CONTRIBUTING FACTOR:** Insert a brief explanation (free text) for the contributing factor identified, relating them to the events of the incident.

**CRITICAL/CATASTROPHIC POTENTIAL INCIDENT**  
BASE METALS / MANITOBA OPERATIONS / PLANT NAME




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**CONTRIBUTING FACTORS**

CAUSES (Immediate, Underlying, Root)		DESCRIPTION OF CONTRIBUTING FACTOR
GROUP	CONTRIBUTING FACTOR	

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Title		SPI #
Department <b>Safety, Health and Environment</b>	Supersedes SPI Dated	Effective Date

**SLIDE 7 - ACTION:** Describe the actions to be taken to prevent the occurrence of similar events. All contributing factors identified must have at least one associated action. However, one action may address more than one contributing factor. Additionally, further actions may be identified, that are not necessarily related to any of the contributing factors. It is important to remember that actions to address the immediate contributing factors are necessary, but are not sufficient to prevent the recurrence of similar incidents.

**TYPE OF CONTROL:** List, from the Hierarchy of Controls, which type of control is to be implemented for each action.

**RESPONSIBLE:** List the person responsible for ensuring the action is implemented.

**DEADLINE:** Inform the deadline for completing the action.

**DEADLINE FOR PERFORMING VERIFICATION OF EFFECTIVENESS:** Enter the deadline for verifying, through auditing, the effectiveness of the action plan.

**CRITICAL/CATASTROPHIC POTENTIAL INCIDENT**  
BASE METALS / MANITOBA OPERATIONS / PLANT NAME

ACTION PLAN				
CONTRIBUTING FACTOR (DESCRIPTION)	ACTION	TYPE OF CONTROL	RESPONSIBLE	TARGET DATE


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Title		SPI #
Department <b>Safety, Health and Environment</b>	Supersedes SPI Dated	Effective Date

**SLIDE 8** - Enter the information about the team responsible for investigating the incident.

**CRITICAL/CATASTROPHIC POTENTIAL INCIDENT**  
BASE METALS / MANITOBA OPERATIONS / PLANT NAME



ANALYSIS COORDINATOR		
NAME	DEPARTMENT	POSITION

INVESTIGATION AND ANALYSIS TEAM		
NAME	DEPARTMENT	POSITION

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Title		SPI #
Department <b>Safety, Health and Environment</b>	Supersedes SPI Dated	Effective Date

Approved By	Title Vice-President, Vale Manitoba Operations
Date	

