



# HSE Accident and Incident Reporting, Investigation and Handling Management Procedure

## Document No.: CLADDING-HSE-EE-19

### 1 Purpose

To standardize the full process of reporting, investigation and handling of Health, Safety and Environment (HSE) accidents (hereinafter referred to as "accidents") and HSE incidents (hereinafter referred to as "incidents") of the Company, identify causes, clarify responsibilities, formulate and implement corrective and preventive measures, prevent the recurrence of similar accidents/incidents, and ensure the safety of employees' lives, property and the environment. In compliance with the *Law of the People's Republic of China on Work Safety, Regulations on the Reporting, Investigation and Handling of Work Safety Accidents* (State Council Decree No. 493), *Work Safety Accident Management Measures of Cladding Technology Shanxi Co., Ltd*, and the HSE control requirements of the COMPANY, this procedure is hereby formulated.

### 2 Scope of Application

This procedure applies to all departments of the Company (Quality, Safety and Environmental Protection Department, Logistics and Transportation Department, Warehousing Center, Equipment Management Department, Administration Department, Human Resources Department, all business departments, branch companies, project departments) and all personnel working within the Company's controlled areas (regular employees, dispatched workers, interns, outsourced personnel, contractors), covering the following scopes:

#### 2.1 Types of Accidents/Incidents

##### 2.1.1 Accident Classification (Newly Detailed)

- Work Safety Accidents: Object strikes in warehousing, traffic accidents in logistics and transportation, mechanical injuries in equipment maintenance, electric shocks, falls from height, object strikes;

- Environmental Pollution Accidents: Soil/water pollution caused by leakage of hazardous chemicals (rust inhibitors, cleaning agents), excessive emission of fire fumes, environmental pollution caused by leakage of warehoused materials;
- Traffic Accidents: Collisions, overturns, rear-end collisions, etc., involving the Company's owned/leased vehicles during road transportation that result in personnel injuries or property losses;
- Fire Accidents: Uncontrolled combustion incidents such as fires in warehoused materials, electrical fires in equipment, and fires in office areas/canteens;
- Occupational Hazard Accidents: Acute health impairment incidents (e.g., dermatitis, poisoning) caused by employees' exposure to dust (e.g., warehousing and handling), noise (e.g., equipment operation), and chemical toxins (e.g., cleaning agents) during occupational activities.

### **2.1.2 Incident Classification (Newly Detailed)**

- Near-Miss Incidents: Incidents that have occurred but caused no personnel injuries, health impairments, environmental pollution or property losses (e.g., near-falls of warehoused materials, driver's emergency braking to avoid rear-end collisions, timely blocking of minor leakage of hazardous chemicals);
- Unsafe Acts: Acts that violate safety operating procedures or systems (e.g., failure to wear dust masks as required, illegal operation of cranes);
- Unsafe Conditions: Risky conditions of equipment, facilities or the environment (e.g., loose shelves, slippery floors, missing protective devices for equipment).

## **2.2 Business Scenarios**

- Internal Company Scenarios: Warehousing operation areas, logistics and transportation areas, equipment maintenance areas, office areas, canteens, laboratories, operation sites of branch companies/project departments;
- External Associated Scenarios: During transportation by carriers, at supplier delivery sites, at outsourced/contractor equipment maintenance sites, and in Company-leased premises.

## **3 Terms and Definitions**

### **3.1 HSE Accident (Referred to as "Accident")**

An unexpected event that occurs during production and operation activities, resulting in personnel injuries (minor injuries, severe injuries, deaths), property losses (direct loss  $\geq$  RMB 10,000) or environmental impacts (excessive pollution, ecological damage). Accidents are classified into extremely major accidents, major accidents, relatively major accidents, general accidents, and minor accidents based on severity.

### **3.2 HSE Incident (Referred to as "Incident")**

An unexpected situation that causes no personnel injuries, property losses or environmental impacts but poses potential safety risks (may escalate into accidents), including near-miss incidents, unsafe acts, and unsafe conditions.

### 3.3 Accident Level (Newly Detailed, in accordance with national and group standards)

Accident Level	Determination Criteria (Meet Any One)
Extremely Major Accident	Causing 30 or more deaths / 100 or more severe injuries, or direct economic loss $\geq$ RMB 100 million, or extremely severe environmental pollution
Major Accident	Causing 10-29 deaths / 50-99 severe injuries, or direct economic loss of RMB 50-100 million, or severe environmental pollution
Relatively Major Accident	Causing 3-9 deaths / 10-49 severe injuries, or direct economic loss of RMB 10-50 million, or moderate environmental pollution
General Accident	Causing 1-2 deaths / 3-9 severe injuries / 10-29 minor injuries, or direct economic loss of RMB 1-10 million, or local minor environmental pollution
Minor Accident	Causing 1-9 minor injuries, or direct economic loss of RMB 10,000-100,000, with no environmental impact

### 3.4 Accident Reporting

The process in which on-site personnel and relevant departments report accident information to the responsible department (Quality, Safety and Environmental Protection Department), superior units (COMPANY) and government authorities within the specified time limit and through designated channels after an accident occurs, including immediate reports and written reports.

### 3.5 Accident Investigation

A process conducted by a specially established investigation team in accordance with the "Four No Omissions" principle (no omission of unascertained causes, no omission of untreated responsible personnel, no omission of unimplemented corrective measures, no omission of uneducated relevant personnel). Through on-site investigation, witness interviews, and document review, the team identifies accident causes, confirms responsibilities, and proposes corrective measures.

### **3.6 Corrective and Preventive Measures**

Measures formulated to eliminate hidden hazards and prevent the recurrence of similar issues, targeting the direct causes, indirect causes (including root causes) identified in accident/incident investigations. These include corrective measures (rectifying existing issues) and preventive measures (preventing potential issues).

## **4 Responsibility Assignment**

### **4.1 Company Top Management**

- Bear ultimate responsibility for accident/incident management;
- Approve investigation and handling reports of extremely major/major accidents and responsibility pursuit plans;
- Ensure investment in resources (funds, personnel, technical support) required for accident/incident management;
- Preside over the investigation initiation meeting for extremely major/major accidents and coordinate the participation of external units (emergency management departments, public security, fire-fighting).

### **4.2 Management Representative**

- Supervise the compliance of the full process of accident/incident reporting, investigation and handling;
- Review investigation and handling reports of relatively major/general accidents and corrective and preventive measures plans;
- Organize the verification of the implementation of accident/incident corrective and preventive measures;
- Coordinate cross-departmental disputes (e.g., disputes over responsibility confirmation, disputes over the implementation of corrective measures).

### **4.3 Quality, Safety and Environmental Protection Department (Responsible Management Department, Newly Detailed)**

- Take the lead in formulating and revising this procedure and establishing and maintaining the accident/incident management system;
- Be responsible for accident/incident reporting management: receive on-site reports, verify information, and report relatively major and above accidents to the Pipeline Bureau and local government authorities within 1 hour;
- Be responsible for organizing accident/incident investigations: establish investigation teams based on accident levels, guide investigation implementation, and review investigation reports;

- Be responsible for accident/incident recording and statistics: establish the *Accident/Incident Ledger*, conduct regular (quarterly/annual) statistical analysis of accident/incident trends, and identify systemic issues;
- Supervise the implementation of corrective and preventive measures: track the progress of measures implemented by responsible departments, verify effectiveness, and require rectification if standards are not met;
- Be responsible for accident/incident archive management: archive reports, investigation records, and rectification verification materials in accordance with the *HSE Document and Record Control Procedure*.

#### **4.4 All Business and Functional Departments/Units (Newly Detailed)**

- Branch Companies/Project Departments: Manage accidents/incidents in their respective jurisdictions in accordance with this procedure, report to the Quality, Safety and Environmental Protection Department in a timely manner, and cooperate with investigations and rectification;
- Contractor Management Department: Supervise contractors' accident/incident reporting within the Company's controlled areas, require contractors to comply with this procedure, and participate in relevant investigations;
- Other Departments (Logistics and Transportation Department/Warehousing Center, etc.):
  - a. Report accidents/incidents occurring in their own departments/jurisdictions in a timely and accurate manner, and strictly prohibit delayed reporting, underreporting, false reporting, or concealment;
  - b. Protect the accident/incident site (set up warning zones, preserve traces) and take emergency measures to prevent the situation from expanding (e.g., blocking leakage of hazardous chemicals);
  - c. Participate in or cooperate with accident/incident investigations related to their own departments, and provide operation records, equipment logs, and other materials;
  - d. Organize the implementation of corrective and preventive measures within the scope of their departmental responsibilities, and complete and submit verification materials on time.

#### **4.5 Accident and Incident Investigation Teams (Newly Clarified)**

##### **4.5.1 Composition Principles (Based on Accident Levels)**

Accident Level	Investigation Team Leader	Team Member Composition
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Extremely Major/Major Accident	Company Top Management	Management Representative, Head of Quality, Safety and Environmental Protection Department, heads of all departments, external experts (emergency, public security, environmental protection), representatives of the Pipeline Bureau
Relatively Major Accident	Management Representative	Head of Quality, Safety and Environmental Protection Department, head of the jurisdiction department/branch company, specialists from Human Resources Department/Finance Department/Administration Department, external technical experts
General Accident	Head of Quality, Safety and Environmental Protection Department	Specialists from Quality, Safety and Environmental Protection Department, head of the jurisdiction department, specialists from Human Resources Department, technical personnel
Minor Accident/Incident	Head of the Jurisdiction Department	Safety officer of the jurisdiction department, specialist from Quality, Safety and Environmental Protection Department (supervision)

#### 4.5.2 Core Responsibilities

- Identify the time, location, process, casualties/losses/pollution situation of the accident/incident;

- Analyze direct causes (unsafe acts of personnel, unsafe conditions of objects), indirect causes (insufficient training, management loopholes), and root causes (system defects);
- Confirm the nature and responsibility of the accident/incident (direct responsibility, primary responsibility, leadership responsibility);
- Propose responsibility pursuit suggestions (administrative sanctions, economic penalties, transfer to judicial authorities);
- Formulate targeted corrective and preventive measures (clarify responsible departments, time limits, and acceptance standards);
- Prepare the *Accident/Incident Investigation Report* and submit it for approval in accordance with authority.

## **4.6 All Personnel (Including Contractor Personnel)**

- When an accident/incident occurs, report to the on-site supervisor/team leader at the first time and take self-rescue and mutual rescue measures;
- Cooperate with investigations: truthfully provide witness information and operation processes, and do not conceal information;
- Implement corrective and preventive measures: participate in post rectification (e.g., learning new procedures, participating in training);
- Report unsafe acts/conditions: report potential risks (e.g., equipment abnormalities) in a timely manner to prevent incidents from escalating into accidents.

## **5 Work Procedures**

### **5.1 Classification and Grading of Accidents and Incidents (Newly Independent Chapter)**

#### **5.1.1 Classification Process**

1. After an accident/incident occurs, the jurisdiction department initially determines the type (e.g., traffic accident, fire accident) and fills out the *Accident/Incident Immediate Report Form* (Appendix A);
2. The Quality, Safety and Environmental Protection Department reviews the accuracy of the classification, and organizes technical personnel to identify (e.g., whether it belongs to an environmental pollution accident) if necessary;
3. The classification result is included in the reporting and investigation materials, serving as the basis for subsequent statistical analysis.

#### **5.1.2 Grading Process**

1. The jurisdiction department initially determines the level (e.g., minor accident/general accident) based on personnel injuries and property losses;

2. The Quality, Safety and Environmental Protection Department finally confirms the level based on medical diagnosis and financial accounting results (direct losses);
3. Relatively major and above accidents need to be submitted to government authorities for review and confirmation of the level.

## 5.2 Reporting of Accidents and Incidents (Integrated and Optimized)

### 5.2.1 Reporting Procedures and Time Limits (Newly Detailed)

#### 1. Immediate Reporting (On-site → Reporting):

- After discovering an accident/incident, on-site personnel shall report to the team leader/on-site supervisor immediately ( $\leq 5$  minutes) and take emergency measures (e.g., rescuing the injured) at the same time;
- After receiving the report, the on-site supervisor shall report to the department head and the Quality, Safety and Environmental Protection Department immediately ( $\leq 10$  minutes);
- After receiving the report of a relatively major or above accident, the Quality, Safety and Environmental Protection Department shall report to the Company's management, the Pipeline Bureau and local government authorities (emergency, environmental protection, etc.) within 1 hour.

#### 2. Written Reporting (Subsequent Supplement):

Type of Accident/Incident	Time Limit for Written Report (Submitted by Quality, Safety and Environmental Protection Department)	Recipients of the Report
Extremely Major/Major Accident	$\leq 2$ hours	Company Top Management, Pipeline Bureau, provincial government authorities
Relatively Major Accident	$\leq 12$ hours	Management Representative, Pipeline Bureau, municipal government authorities
General Accident	$\leq 24$ hours	Management Representative, Pipeline Bureau

Minor Accident/Incident	≤1 working day	Quality, Safety and Environmental Protection Department, jurisdiction department
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## 5.2.2 Reporting Content and Formats

1. Content of Immediate Report: Briefly include the time, location, type of accident/incident, preliminary situation of casualties/losses, measures taken, reporter and contact information;
2. Content of Written Report (*Accident/Incident Immediate Report Form* in Appendix A):
  - Overview of the accident/incident unit (department/branch company, post);
  - Detailed process (cause, development, emergency disposal);
  - Information of casualties (name, post, injury diagnosis, medical status);
  - Property losses/environmental impacts (details of damaged equipment/materials, monitoring data of pollution scope);
  - Preliminary cause analysis and implemented control measures;
3. Reporting Formats: Immediate reports can be made via phone, emergency platform, or WeChat (with traceability); written reports shall be in paper form (signed) + electronic form, attached with on-site photos/videos.

## 5.3 Investigation of Accidents and Incidents (Integrated and Optimized)

### 5.3.1 Investigation Principles and Methods

1. Core Principles:
  - "Four No Omissions" Principle: No omission of unascertained causes, no omission of untreated responsible personnel, no omission of unimplemented corrective measures, no omission of uneducated relevant personnel;
  - Objectivity and Fairness Principle: Based on facts and evidence, no subjective assumptions, and no external interference;
  - Scientific Analysis Principle: Adopt professional methods (e.g., fault tree analysis) to identify root causes.
2. Investigation Methods (Newly Detailed):
  - On-site Investigation: Take photos/videos to fix evidence (e.g., damaged parts of equipment, leakage traces), measure the dimensions of the accident location, collect residues (e.g., wire rope fragments), and fill out the *Accident On-site Investigation Record* (Appendix C);

- Personnel Interviews: Conduct individual interviews with parties involved, witnesses, and managers, prepare the *Interview Record* (Appendix D), with at least 2 people present, and the interviewee shall sign for confirmation;
- Document Review: Retrieve training records, equipment maintenance files, work permits, emergency plans, meteorological/traffic data, etc.;
- Technical Appraisal: Entrust third-party institutions to appraise complex accidents (e.g., equipment failures) (e.g., causes of crane wire rope breakage);
- System Analysis: Use Fault Tree Analysis (FTA) to identify the causal chain leading to the accident, and Failure Mode and Effects Analysis (FMEA) to assess potential risks.

### **5.3.2 Investigation Content and Reports**

#### **1. Core Investigation Content:**

- Incident Chain Restoration: Sort out the key nodes of the occurrence, development, and disposal of the accident/incident in chronological order;
- Cause Analysis:
  - i . Direct Causes: Unsafe acts of personnel (e.g., illegal operation), unsafe conditions of objects (e.g., equipment defects);
  - ii . Indirect Causes: Insufficient training, lack of management supervision, incomplete systems, improper emergency disposal;
  - iii. Root Causes: Defects in the HSE management system (e.g., failure to establish a regular equipment inspection system);
- Responsibility Confirmation: Clarify the responsible units/personnel and types of responsibilities (direct/primary/leadership responsibility);
- Emergency Assessment: Analyze the effectiveness of emergency disposal and summarize experience and lessons.

#### **2. Preparation of Investigation Reports:**

- The investigation team shall complete the *Accident/Incident Investigation Report* (Appendix E) within the specified time limit ( $\leq 30$  days for major accidents,  $\leq 15$  days for relatively major accidents,  $\leq 7$  days for general accidents);
- The report shall include: basic information of the accident/incident, process, cause analysis, responsibility confirmation, handling suggestions, corrective and preventive measures;
- After the report is approved in accordance with authority, it shall be issued to relevant departments for implementation. Investigation reports of major/relatively major accidents shall be submitted to the Pipeline Bureau and government authorities.

## **5.4 Analysis and Handling of Accidents and Incidents (Integrated and Optimized)**

## 5.4.1 Responsibility Confirmation and Handling

### 1. Classification of Responsibility Types:

- Direct Responsibility: Personnel who directly cause the accident/incident (e.g., crane operators who operate illegally);
- Primary Responsibility: Personnel who fail to perform supervision duties and cause the accident (e.g., safety officers who fail to conduct inspections);
- Leadership Responsibility: Department heads who fail to perform management duties (e.g., heads of the Warehousing Center who fail to organize training).

### 2. Handling Measures (Newly Detailed):

Responsibility Type	Handling Methods	Example (General Accident)
Direct Responsibility	Administrative sanctions (warning, demerit recording) + economic penalties (10%-20% of monthly salary) + off-job training	Warning, RMB 2,000 fine, return to work only after passing training
Primary Responsibility	Administrative sanctions (circular criticism, demerit recording) + economic penalties (5%-10% of monthly salary)	Circular criticism, RMB 1,000 fine
Leadership Responsibility	Administrative sanctions (demerit recording, demotion) + economic penalties (20%-30% of monthly salary)	Demerit recording, RMB 3,000 fine, cancellation of annual excellent evaluation qualification
Unit Responsibility	Deduction of HSE performance assessment scores (5-15 points) + special rectification	Deduction of 8 points from the Warehousing Center's performance assessment, completion of special rectification within 1 month
Severe Responsibility (Major Accidents)	Termination of labor contract + transfer to	Termination of labor relationship, transfer to

	judicial authorities (if suspected of a crime)	public security authorities for investigation
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#### 1. Handling Process:

- The investigation team proposes handling suggestions → reviewed by the Quality, Safety and Environmental Protection Department → approved by the Management Representative/Company Top Management → implemented by the Human Resources Department/Finance Department (sanctions, fines) → publicize the handling results (internally).

### 5.4.2 Formulation and Implementation of Corrective and Preventive Measures (Newly Independent Chapter)

#### 1. Requirements for Formulating Measures:

- Targeted: Directly address the root cause (e.g., formulate a special training plan if training is insufficient);
- Operable: Clarify the responsible department, responsible person, completion time limit, and acceptance standards (e.g., "Equipment Management Department shall complete the inspection of all cranes within 15 days");
- Hierarchical: Include post operation improvements (e.g., revise operating procedures) and management system optimization (e.g., establish a monthly inspection system).

#### 2. Formulation and Approval Process:

- The responsible department formulates the *Corrective and Preventive Measures Plan* (Appendix F) based on the investigation report → reviewed by the Quality, Safety and Environmental Protection Department → approved by the Management Representative (for relatively major accidents)/Company Top Management (for major accidents) → issued for implementation.

#### 3. Tracking and Verification:

- The responsible department implements the plan and submits progress to the Quality, Safety and Environmental Protection Department regularly (weekly);
- After completion, submit verification materials (e.g., training attendance sheets, inspection reports);
- The Quality, Safety and Environmental Protection Department conducts on-site verification (e.g., spot-check equipment inspection records), marks the item as closed if qualified, and requires re-rectification if unqualified, and pursues the responsibility for delays.

## 5.5 Recording, Statistics and Analysis (Newly Detailed)

### 5.5.1 Recording and Archiving

- Establish a "one case, one file" system: Archival materials for each accident/incident include the *Accident/Incident Immediate Report Form*, *On-site Investigation Record*,

*Interview Record, Investigation Report, Corrective and Preventive Measures Plan, and Verification Record;*

- Archiving Requirements: Paper materials shall be stored in file cabinets, electronic materials shall be stored encrypted, with a retention period of  $\geq 5$  years ( $\geq 10$  years for major accidents), managed in accordance with the *HSE Document and Record Control Procedure*.

## **5.5.2 Statistics and Analysis**

- Statistical Cycle: The Quality, Safety and Environmental Protection Department summarizes minor accidents/incidents monthly, counts general and above accidents quarterly, and conducts annual analysis;
- Analysis Content:
  - a. Type Distribution: e.g., proportion of traffic accidents, number of object strikes in warehousing;
  - b. Time Trend: e.g., reasons for the increase in accidents in a certain quarter;
  - c. Root Cause Analysis: e.g., if multiple accidents are caused by "insufficient training", the training system needs to be optimized;
- Application of Results:
  - a. Serve as input for HSE management review and propose system improvement suggestions;
  - b. Report to the Company's management and formulate annual HSE improvement goals (e.g., "reduce accident rate by 10%").

## **5.6 Communication and Education (Newly Chapter)**

### **5.6.1 Internal Communication**

- The handling results of relatively major and above accidents shall be publicized internally (e.g., bulletin boards, intranet) to inform employees of the causes and lessons;
- The Quality, Safety and Environmental Protection Department holds quarterly accident/incident briefing meetings, where all departments share typical cases and exchange prevention experience.

### **5.6.2 Safety Education**

- Incorporate typical accident/incident cases into HSE training (new employee induction, on-the-job re-training), and restore the process through videos and on-site explanations;
- Organize "Accident Reflection Day" activities, allowing employees to discuss how to prevent similar risks in combination with their posts to improve safety awareness.

## **6 Related Documents**

- *Law of the People's Republic of China on Work Safety*

- *Regulations on the Reporting, Investigation and Handling of Work Safety Accidents (State Council Decree No. 493)*
- *Work Safety Accident Management Measures of Cladding Technology Shanxi Co., Ltd*
- *HSE Emergency Preparedness and Response Management Procedure*
- *HSE Non-Conformity, Corrective and Preventive Measures Management Procedure*
- *HSE Document and Record Control Procedure*
- *HSE Training Management Procedure*
- *Contractor HSE Management Procedure*

## 7 Records

- *Accident/Incident Immediate Report Form (Appendix A)*
- *Accident/Incident Ledger (Appendix B)*
- *Accident On-site Investigation Record (Appendix C)*
- *Accident/Incident Interview Record (Appendix D)*
- *Accident/Incident Investigation Report (Appendix E)*
- *Corrective and Preventive Measures Plan (Appendix F)*
- *Corrective and Preventive Measures Tracking and Verification Record (Appendix G)*
- *Accident/Incident Statistics and Analysis Report (Appendix H)*

## 8 Appendices

### Appendix A: Accident/Incident Immediate Report Form (Template)

Report No.	A-2026001	Report Date	X hour X minute, X month X day, 2026
Basic Information of Accident/Incident	Type	Work Safety Accident (Object Strike)	Level (Preliminary)
	Occurrence Time	X hour X minute, X month X day, 2025	Occurrence Location
	Involved Objects	Zhang San (regular employee,	Reporter

		warehousing operator) / Li Si (contractor)	
Brief Process	At X hour X minute, X month X day, 2025, when Zhang San was operating a crane to lift steel in Area A, the steel swayed and collided with the shelf, causing parts on the shelf to fall and hit Li Si (contractor) who was working below, resulting in a fracture of Li Si's leg. Zhang San immediately stopped work and called 120.		
Casualty/Loss Situation	Personnel Casualties	1 person with severe injury (Li Si, left leg fracture)	Property Loss
	Environmental Impact	None	
Implemented Measures	1. Rescuing the injured: Li Si has been sent to XX Hospital for treatment; 2. Protecting the site: A warning zone has been set up to prohibit unrelated personnel from entering; 3. Preliminary inspection: No illegal operation of the crane, and loose bolts of the shelf are		

	suspected to be the cause.		
Recipient's Signature	Quality, Safety and Environmental Protection Department: Zhao Liu	Receiving Time	X hour X minute, X month X day, 2025
Approval Opinion	Management Representative: Agree to initiate an investigation into this general accident, with the investigation team led by Zhao Liu of the Quality, Safety and Environmental Protection Department. Signature: XXX Date: X month X day, 2025		

## Appendix B: Accident/Incident Ledger (Template)

Serial No.	Incident No.	Occurrence Date	Type	Level	Occurrence Location	Casualty/Loss Situation	Handling Status	Responsible Person	Remarks
1	A-2025001	2025.01.10	Object Strike	General	Area A of Warehousing Center	1 person with severe injury	Rectification and Verification Completed	Zhang San	
2	B-2025001	2025.02.15	Near-Miss Incident	-	Logistics and Transport	None	Measures Being	Sun Qi	Vehicle rolla

					rtation Parking Lot		Implem ented		way stop ped
3	A- 2025 002	2025.0 3.20	Environ mental Pollution	Min or	Near Hazardo us Chemic al Wareho use	Minor soil pollution	Investig ation Report Under Approv al	Zhou Ba	Clea ning agen t leaka ge

### Appendix C: Accident On-site Investigation Record (Template)

Investigation No.	C-2025001	Investigation Time	X hour X minute to X hour X minute, X month X day, 2025
Investigators	Team Leader: Zhao Liu (Quality, Safety and Environmental Protection Department); Members: Wang Wu (Warehousing Center), Qian Qi (Technical Department)		
Accident Location	Crane operation position in Area A of the Warehousing Center (branch company)		
Investigation Content and Results	1. Equipment Status: - Crane: Model QZ10, manufactured in 2020, last maintained in January 2025, no deformation of the hook, wear of the wire rope ≤5% (qualified); - Shelf: 3 bolts on the third layer of Shelf 2 are loose (3		

	<p>unfastened), obvious traces of falling parts, shelf material Q235 (meets standards); 2. Operation Environment: - Lighting: Brightness 200lux (qualified), no obstruction; - Ground: No water accumulation, no obstacles within the operation radius; 3. Residues: - Falling parts: 10 M16 bolts, no rust on the surface, stored in evidence bag (No. WZ2025001).</p>		
Investigation Evidence	Photo 1: Loose bolts of the shelf; Photo 2: Falling parts; Video 1: On-site panorama		
Investigation Conclusion	Loose bolts of the shelf are the direct cause of the falling parts, and the cause of the loose bolts (maintenance/installation) needs to be further investigated.		
Signature Confirmation	Zhao Liu, Wang Wu, Qian Qi	Date	X month X day, 2025

## Appendix D: Accident/Incident Interview Record (Template)

Record No.	D-2025001	Interview Time	X hour X minute to X hour X minute, X month X day, 2025
Interviewer	Zhao Liu (Quality, Safety and Environmental	Recorder	Sun Ba

	Protection Department)		
Interviewee	Name: Zhang San; Position: Warehousing Operator; ID No.: XXXX; Contact Phone: 139XXXX4567; Relationship with the Accident: Party Involved		
Interview Content	Q: Did you check the shelf status before lifting? A: No, I thought the shelf was fixed and there had been no problems before. Q: Were you aware of the loose bolts of the shelf? A: No, the maintenance last week did not mention any problems with the shelf, and I have no authority to check the bolts. Q: Was there a dedicated person directing the operation? A: No, I operated it myself, and Li Si was organizing parts below, 3 meters away from the crane. Q: Has the Company provided training on safety requirements for lifting operations? A: Training was provided in December 2024, but it did not		

	cover shelf inspection.		
Interviewee's Confirmation	The above content is consistent with what I stated, with no omissions. Signature: Zhang San Date: X month X day, 2025		
Interviewer's Signature	Zhao Liu	Date	X month X day, 2025

## Appendix E: Accident/Incident Investigation Report (Template) (Adjusted from Appendix E)

Report No.	E-2025001	Accident Level	General Accident
Investigation Team Leader	Zhao Liu (Quality, Safety and Environmental Protection Department)	Investigation Time	X month X day to X month X day, 2025
1. Basic Information	1. Accident Unit: Warehousing Center (branch company); 2. Accident Time: X hour X minute, X month X day, 2025; 3. Casualty Situation: Li Si (contractor) suffered a severe injury (left leg fracture); 4. Direct Loss: RMB 5,000 (shelf repair) + RMB 20,000 (medical expenses); 5. Accident Type: Work Safety		

	Accident (Object Strike).		
2. Accident Process	<p>At X hour X minute, X month X day, 2025, Zhang San (warehousing operator) operated a crane to lift steel to Shelf 2 in Area A of the Warehousing Center. The steel swayed and collided with the third layer of the shelf. Due to loose bolts (3 unfastened) on the shelf, M16 bolts on the layer fell and hit Li Si (contractor) who was organizing parts below, causing a severe injury. Zhang San immediately stopped work, called 120 and reported the incident. Li Si was sent to the hospital for treatment on the same day.</p>		
3. Cause Analysis	<p>(1) Direct Causes 1. Loose bolts on the shelf, which became unstable under load and caused parts to fall; 2. Zhang San failed to check the shelf status in the operation area, and Li Si illegally stayed below the lifting area. (2) Indirect Causes 1. Lack of</p>		

	<p>maintenance management: The Warehousing Center failed to check the shelf bolts during maintenance last month and did not record maintenance status; 2. Insufficient training: No training on "checking surrounding facilities before lifting" was provided to operators, and contractors did not receive on-site safety training; (3) Root Cause The "Facility Maintenance System" in the Company's HSE management system does not specify the inspection frequency and standards for auxiliary facilities such as shelves, and there are loopholes in the contractor on-site safety management process.</p>		
<p>4. Responsibility Confirmation</p>	<p>1. Direct Responsibility: Zhang San (failed to check the shelf), Li Si (illegal stay); 2. Primary Responsibility: Wu Jiu (maintenance worker of the</p>		

	<p>Warehousing Center, failed to check bolts); 3. Leadership Responsibility: Zheng Shi (Director of the Warehousing Center, failed to implement the maintenance system), Feng Shi Yi (contractor management specialist, failed to organize contractor training).</p>		
5. Handling Suggestions	<p>1. Zhang San: Warning, RMB 1,500 fine (10% of monthly salary); 2. Wu Jiu: Demerit recording, RMB 2,000 fine (15% of monthly salary); 3. Zheng Shi: Circular criticism, 5 points deducted from HSE performance; 4. Contractor: RMB 5,000 fine, rectify the on-site training process within a time limit; 5. Li Si: Handled in accordance with the contractor contract, and the Company assists in applying for work-related injury compensation.</p>		
6. Corrective and Preventive Measures	<p>1. System Improvement: The Quality, Safety and</p>		

	<p>Environmental Protection Department shall revise the <i>Facility Maintenance System</i> within 15 days, specifying the shelf inspection frequency (once a month) and standards; 2.</p> <p>Training Rectification: The Warehousing Center shall organize "surrounding facility inspection" training for operators within 10 days, and the Contractor Management Department shall improve the on-site training process within 5 days; 3.</p> <p>Facility Inspection: The Equipment Management Department shall inspect the bolts of all warehousing shelves within 3 days, and conduct monthly inspections and record them thereafter; 4.</p> <p>Contractor Management: Establish a contractor safety performance file, which is linked to cooperation qualifications.</p>		
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Investigation Team Signature	Zhao Liu, Wang Wu, Qian Qi	Approval Opinion	Management Representative: Agree to the investigation conclusions and handling suggestions, and implement the measures as planned. Signature: XXX Date: X month X day, 2025
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## Appendix F: Corrective and Preventive Measures Plan (Template) (Newly Added)

Plan No.	F-2025001	Associated Accident/Incident No.	A-2025001
Measures List	Serial No.	Measure Content	Responsible Department
	1	Revise the <i>Facility Maintenance System</i> and specify shelf inspection requirements	Quality, Safety and Environmental Protection Department
	2	Conduct "surrounding facility inspection" training for warehousing operators	Warehousing Center
	3	Inspect the bolts of all warehousing shelves	Equipment Management Department
	4	Improve the contractor on-site training process	Contractor Management Department

Approval Opinion	Management Representative: Agree to the measures plan, and the Quality, Safety and Environmental Protection Department shall track the progress. Signature: XXX Date: X month X day, 2025		
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### Appendix G: Corrective and Preventive Measures Tracking and Verification Record (Template) (Newly Added)

Verification No.	G-2025001	Associated Plan No.	F-2025001
Verification Status	Serial No.	Measure Content	Actual Completion Time
	1	Revise the <i>Facility Maintenance System</i>	X month X day, 2025
	2	Conduct training for warehousing operators	X month X day, 2025
	3	Inspect shelf bolts	X month X day, 2025
	4	Improve the contractor training process	X month X day, 2025
Overall Conclusion	All corrective and preventive measures have been completed as planned, meeting the acceptance		

	standards, and the accident risks have been eliminated. Verifier: Zhao Liu (Quality, Safety and Environmental Protection Department) Date: X month X day, 2025		
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## Appendix H: Accident/Incident Statistics and Analysis Report (Template) (Newly Added)

Report No.	H-2025Q1	Statistical Cycle	January-March 2025
Statistical Scope	All departments and branch companies of the Company, including contractor accidents/incidents	Statistician	Zhao Liu (Quality, Safety and Environmental Protection Department)
1. Statistical Overview	Total Number of Accidents/Incidents: 5 1. Accidents: 2 (1 general accident, 1 minor accident); 2. Incidents: 3 (2 near-miss incidents, 1 unsafe condition); 3. Type Distribution: 1 object strike, 1 traffic accident, 1 equipment abnormality, 2 operation violations; 4. Regional Distribution: 3 in the Warehousing Center, 1 in the Logistics and Transportation Department, 1 in the branch company.		

<p>2. Trend Analysis</p>	<p>1. Comparison with the previous quarter (Q4 2024): The number of accidents decreased by 20%, and the number of incidents increased by 50% (increase in near-miss incidents); 2. Main Issues: The Warehousing Center accounts for 60% of accidents/incidents, focusing on "facility maintenance" and "operation specifications"; 3. Contractor-Related: 1 incident (object strike) caused by insufficient on-site training.</p>		
<p>3. Root Cause Analysis</p>	<p>1. Management Level: The facility maintenance system is not detailed (e.g., shelf inspection), and the contractor on-site management process is not strict; 2. Implementation Level: Grassroots safety officers have insufficient supervision frequency, and employees have weak risk awareness (operation violations).</p>		
<p>4. Improvement Suggestions</p>	<p>1. System Optimization: Revise the <i>Facility Maintenance System</i> and <i>Contractor HSE Management</i></p>		

	<p><i>Procedure</i>; 2. Supervision Strengthening: Increase the inspection frequency of safety officers in the Warehousing Center (twice a day); 3. Training Focus: Conduct special "warehousing safety" training in Q2, covering all operators and contractors.</p>		
Approval Opinion	<p>Management Representative: Agree to the analysis conclusions, and incorporate the improvement suggestions into the Q2 HSE work plan. Signature: XXX Date: April 10, 2025</p>		

## 9 Supplementary Provisions

**9.1 This procedure shall be interpreted by the Company's Quality, Safety and Environmental Protection Department.**

**9.2 This procedure shall come into force on the date of issuance. In case of any inconsistency between the existing accident/incident management regulations and this procedure, this procedure shall prevail.**

**9.3 This procedure shall be reviewed once a year, or revised in a timely manner according to updates to national laws and regulations, changes in the Company's business (e.g., newly**

**added business segments, overseas project expansion), and rectification requirements for major accidents.**

**9.4 For matters not covered in this procedure, refer to the *Law of the People's Republic of China on Work Safety, Regulations on the Reporting, Investigation and Handling of Work Safety Accidents*, and relevant regulations of the Group Company and the Pipeline Bureau.**