

## PROCEDURE: PCD-000584

Title: **Accident and Incident Reporting and Investigation**

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### **TABLE OF CONTENTS**

- PROCEDURE: PCD-000584..... 1
- 1. INTRODUCTION..... 2
- 2. SCOPE ..... 2
- 3. REFERENCES..... 2
- 3.1. External Standards and Regulations..... 2
- 4. DEFINITIONS ..... 2
- 5. ROLES AND RESPONSIBILITIES..... 3
- 6. REPORTING ACCIDENTS, INCIDENTS AND INJURIES ..... 4
- 7. CRITERIA FOR CONTACTING OSHA ..... 5
- 8. ROOT CAUSE INVESTIGATIONS ..... 6
- 9. RECORDKEEPING..... 7
- 10. TRAINING..... 7
- 11. APPENDIX A – INCIDENT INVESTIGATION FORM..... 8

## 1. INTRODUCTION

Bioventus LLC is committed to providing a safe and healthy work environment for all employees. Through its health and safety policies, procedures and guidelines, the company aims to minimize accidents, incidents and injuries that occur in the workplace or while performing job duties. In the event an incident does occur, this procedure establishes a process for reporting, investigating the root cause and implementing corrective actions in order to minimize future accidents/incidents.

## 2. SCOPE

This policy applies to all Bioventus facilities. The procedures that are outlined in this document include processes for reporting minor and severe injuries/illnesses, incidents that result in property damage as well as safety incidents that could have resulted in severe injury or significant property loss.

This procedure applies to all Bioventus employees as well as any visitors, contractors or contract workers who are onsite. This procedure also applies to any accident/incident that occurs with a Bioventus employee while performing job duties offsite (ex. sales reps, business travel, etc.).

## 3. REFERENCES

### 3.1. External Standards and Regulations

Reference	Description
29 CFR 1904.39	OSHA – Reporting Fatal or Severe Injuries
29 CFR 1904.70	OSHA – Recordkeeping and Recording Criteria

## 4. DEFINITIONS

Term or Abbreviation	Definition
First Aid Injury	Medical attention that is usually administered immediately after the injury occurs and at the location where it occurred. It often consists of a one-time, short-term treatment and requires little technology or training to administer. First aid can include cleaning minor cuts, scrapes, or scratches; treating a minor burn; applying bandages and dressings; the use of non-prescription medicine; draining blisters; removing debris from the eyes; massage; and drinking fluids to relieve heat stress.
OSHA	United States Occupational Safety and Health Administration

Term or Abbreviation	Definition
OSHA Recordable Injury	Any work-related accident/injury that results in death, days away from work, restricted work or job transfer, medical treatment beyond first aid or loss of consciousness
Property Loss / Damage	Physical destruction or loss of tangible property
Serous Safety Incident	Any event that had the potential to result in a serious injury or property loss.

## 5. ROLES AND RESPONSIBILITIES

The Director, Facilities, Maintenance & EHS has primary responsibility for maintaining this policy and ensuring that:

- All accidents/incidents are reported promptly
- All accidents/incidents are recorded and classified properly
- An accident/incident investigation has been performed (using Appendix A) and corrective actions are captured and implemented
- All state and federal reporting has been completed and submitted

The HR Benefits manager is responsible for:

- Working with an employee in the event of a work-related injury/illness to submit workers compensation claims
- Evaluating ongoing workers compensation cases
- Working with an employee on their return to work (full duty or restricted duty) after a lost time injury/illness.

People Managers and Supervisors are responsible for:

- Promptly reporting and investigating accidents and injuries using the Bioventus Incident Investigation Form (Appendix A)
- Involving other employees in the incident investigation as needed and appropriate (ex. EHS, Facilities, Engineering, etc.)
- Implementing corrective actions that result from investigations

All employees are responsible for

- Promptly reporting any incident causing injury/illness or property loss to their supervisor/manager, including serious safety incidents that had the potential to cause serious injury or significant property damage.
- Participating in root cause analysis investigations, when involved in or witness to a safety incident.

## **6. REPORTING ACCIDENTS, INCIDENTS AND INJURIES**

Any accident that results in either minor or severe injury, as well as any incidents that are the result of negligence or inadequate safety precautions must be reported as soon as possible.

Reporting should be done by the employee who has sustained an injury while at work, or any employees who were witness to a safety incident, and must be reported to:

- Immediate supervisor
- Director, Facilities, Maintenance & EHS
- HR Benefits Manager

Reporting of an incident/injury to the employee's immediate supervisor must be done as soon as possible after the event occurred.

Supervisors must ensure that the incident/injury is reported to EHS and HR within 2 working days after the incident. In the event the injury is severe, EHS and HR must be contacted within the same working day.

Reporting of an accident/incident/injury will prompt a root cause investigation, and therefore timely reporting is expected so that the causes are identified and preventative measures are implemented quickly.

The EHS Department will classify the accident/incident and ensure all of the information surrounding the event is collected. Accidents/incidents will be classified into the following categories:

- First Aid injury
- OSHA Recordable Injury/Illness
- OSHA Recordable Injury/Illness w/lost time
- OSHA Reportable injury(s)
- Safety Incident (w/out injury)
- Damage to Property

If a work-related accident results in any of the following criteria, it will be considered an OSHA Recordable Injury and will be entered onto the site's OSHA 300 log:

- Death
- Days away from work

- Restricted work or transfer to another job
- Medical treatment beyond first aid
- Loss of consciousness
- Significant injury/illness diagnosed by a physician or other licensed healthcare professional, even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid or loss of consciousness.

Bioventus facilities outside the US shall use the same reporting criteria to classify their injuries/illnesses, for the purpose of tracking and trending of safety performance at the enterprise level.

## 7. CRITERIA FOR CONTACTING OSHA

For Bioventus facilities located in the United States, the following types of accidents/injuries require reporting to OSHA, which shall be performed by the Director, Facilities, Maintenance and EHS:

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

In the event that OSHA must be contacted, the following methods must be used to report:

- By telephone or in person to the OSHA Area Office that is nearest to the site of the incident. If the Area Office is closed, one of the two other methods listed here must be used. Leaving a voice message, sending a fax or sending an email to the Area Office is not sufficient.
- By telephone to the OSHA toll-free central telephone number, 1-800-321-OSHA (1-800-321-6742).
- By electronic submission using the reporting application located on OSHA's public website at: [www.osha.gov](http://www.osha.gov)

In the event that OSHA must be contacted, the following information must be provided upon initial report:

- The name of the facility/company/establishment
- Location of the work-related incident
- Time of the work-related incident

- Type of reportable event (i.e. fatality, in-patient hospitalization, amputation or loss of an eye).
- Number of employees who suffered a fatality, in-patient hospitalization, amputation or loss of an eye.
- Names of the employees who suffered a fatality, in-patient hospitalization, amputation or loss of an eye.
- Contact person at Bioventus, and his/her phone number
- A brief description of the work-related incident

## 8. ROOT CAUSE INVESTIGATIONS

Root cause investigations are necessary to identify any deficiencies in processes, work flows, equipment or the physical environment in order to implement corrective actions that can prevent future accidents/incidences. As part of the investigation, the area where the accident/incident occurred should be viewed and statements/interviews with the affected employee or witnesses should be performed.

After reporting an accident/incident, a root cause investigation will be initiated. Root cause investigations shall be completed by the immediate supervisor of the injured employee with aid from any employees involved in, or witness to, the event. The **Bioventus Incident Investigation Form (Appendix A)** must be used to complete the investigation and submitted to the Director, Facilities, Maintenance & EHS.

Investigations shall be performed within 2 working days of the incident occurring, and the written investigation form must be submitted to the EHS Department within 5 working days of the incident occurring.

Any corrective actions resulting from the investigation will be documented and communicated to the appropriate supervisor and/or department head, as well as to the EHS Department. The status of corrective actions will be tracked by the EHS department until complete and/or implemented.

The EHS Department will review all Incident Investigation forms that are submitted for completeness and will follow up as necessary with supervisors/employees with any questions or concerns about the investigation or its results.

In the event of a serious safety incident or injury, the Director, Facilities, Maintenance & EHS should be directly involved and participate in the root cause investigation.

## **9. RECORDKEEPING**

The EHS Department is responsible for maintaining all records of accidents and incidents, along with the resulting investigation documents, for at least five years

The EHS Department is also responsible for maintaining the OSHA 300 Injury/Illness log for each site (located in the U.S.).

The HR Department will maintain records relating to all workers compensation claims.

## **10. TRAINING**

New employees shall be trained on this policy and procedures, including the process of reporting accidents/incidents upon hiring, during orientation.

All employees shall receive training on this policy and procedures annually.

## 11. APPENDIX A – INCIDENT INVESTIGATION FORM

(For Internal Use Only)

**In the event of a medical emergency:**

1. Secure the accident scene and guard any unsafe conditions to eliminate further exposure.
2. If there are any suspected medical injuries contact 911 immediately.
3. Contact the Team Leader or Supervisor.
4. Contact the employee’s emergency contact.
5. After the employee has been taken care of, complete the IIR within 24 hours and forward to the personnel listed in Section VI of this report.

**In the event of an injury that requires medical treatment, but is not an emergency:**

1. Respond to the injured employee in a caring, nonjudgmental manner.
2. Contact your Supervisor for consultation in determining the need for medical intervention. During business hours the EH&S Management Representative can also be consulted.
3. Have the employee complete the Section IV, Employee Statement.
4. If required, arrange for transportation via cab to the nearest medical provider. This expense will be reimbursed by Bioventus.
5. After the employee has been taken care of, complete the IIR within 24 hours and forward to the personnel listed in Section VI of this report.
- 6.

**Section I**

Facility Location			
Employee Name		Emp. No.	
Incident Date		Incident Time	
Date Incident Reported		Dept. (Name/#)	
Exact Location of Incident			
Job Title / Occupation			
Supervisor Name			

**Section II**

Who-What-When-Where-Why-How
Individuals
Location
Equipment
Materials
Safety Devices
Personal Protective Equipment
Reminder - Have employee and any witnesses complete a statement Sections IV and V.

**Section III**

FIVE WHY's – To Determine Root Cause	
Why...?	
Why...?	
Why...?	
Why...?	
Why...?	
Corrective Action(s)	
Person Responsible	
Date Of Completion	

Investigation performed by: \_\_\_\_\_

**Section IV**  
**Employee Statement**

Employee Name		Emp. No.	
Incident Date		Incident Time	
What happened (include what, when, where and how)?			
Did anything unusual or unexpected occur?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
If Yes, What?			
Are there work conditions that contributed to this injury?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
If Yes, What?			
When did you first notice the injury?			
Do you have pain?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
If Yes, when did you first notice the pain?			
Did the pain develop suddenly or gradually?	<input type="checkbox"/> Suddenly	<input type="checkbox"/> Gradually	
Have you ever had this pain before?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
If Yes, When?			
If Yes, how often?			
When did you tell your supervisor?			

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Date

**Section V**

**Witness Statement**

Witness Name		Emp. No.	
Incident Date		Incident Time	
What happened (include who, what, when, where, why and how)?			
Additional information			

\_\_\_\_\_  
Witness Signature

\_\_\_\_\_  
Date

## Section VI

1. Team Leader or Supervisor shall review job hazard analysis (JHA) with the EH&S Management Representative to ensure hazards are appropriately identified and addressed. If not, then revision of the JHA is required to be done and communicated to employees.
  
2. Forward completed IIR report to:
  - a. Barry Mitchell, EH&S Management Representative
  - b. Ambre Wachter, Benefits Manager

## Document Detail

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**Document No.:** PCD-000584[A]

**Title:** Accident and Incident Reporting and Investigation

**Owner:** BARRY.MITCHELL Barry Mitchell

**Status:** RELEASED

## Review

<u>Level</u>	<u>Owner Role</u>	<u>Actor</u>	<u>Sign-off Date</u>	<u>Sign-off By</u>
0	BV Configuration Analyst BV Configuration Analyst	AMBER.PLOTNER Amber Plotner	19-Feb-2024 10:30 pm	AMBER.PLOTNER
1	BV Doc Owner / Author BV Doc Owner / Author	BARRY.MITCHELL Barry Mitchell	20-Feb-2024 3:39 pm	BARRY.MITCHELL
1	BV Doc Approver BV Doc Approver	KATRINA.CHURCH Katrina Church	28-Feb-2024 1:40 pm	KATRINA.CHURCH
1	BV Doc Approver BV Doc Approver	MIKE.CROWE Mike Crowe	26-Feb-2024 11:57 am	MIKE.CROWE
2	BV Configuration Analyst BV Configuration Analyst	AMBER.PLOTNER Amber Plotner	28-Feb-2024 10:54 pm	AMBER.PLOTNER