

Reporting, investigation, and follow-up of accidents and incidents process

Code: **NT.00035**

Version: **3**





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1. Purpose

To determine the actions to be developed in relation to the overall accident management process, including the reporting, classification, investigation, follow-up and review of action plans, as well as the statistical analysis and sharing of lessons learned from all accidents and incidents in accordance with the definitions below.

2. Scope

It applies to all Naturgy Group companies with majority shareholdings in which responsibility is held, within the scope of their operations and/or management, for accidents and incidents, as defined below, that occur during the development of their processes, activities, products and services.

The following are expressly excluded from the scope:

- accidents and incidents on the way to and from work involving employees of cooperating companies and any other accidents and incidents reported by these employees:
 - in the carrying-out of activities not requested by Naturgy.
 - before or after the actual performance of work for Naturgy, except in the case of necessary travel between 2 consecutive jobs.
- occupational illnesses, which shall be managed in accordance with specific protocols to be defined by the country's Medical Assistance function.
- any event related to vandalism, sabotage or fraudulent manipulation of our facilities, provided that these have not had any consequences for employees.
- safety deficiencies detected during visits to sites/worksites that are detected and corrected using other tools (PSO, IDS, work stoppages, 0 tolerances, site inspections, incident log, etc.) and/or applications.
- Industrial accidents, as defined in this document, originating exclusively due to incorrect use by customers or third parties of the products and services provided by Naturgy, provided that they do not have consequences for workers.

Also outside the scope of this regulation is the provision of health care to injured persons resulting from any accident: both initially (first aid), and subsequently, depending on the injuries produced, which will be managed in accordance with its specific processes.

3. Reference documents

- PG.00002.GN Manual for the Integrated management system for quality, environment, safety and health.
- NG.00003 Global health and safety policy
- NG.00023 Crisis management standard
- PG.00004 Identification and assessment of environmental aspects



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- PG.00007 Integrated quality, environment, safety and health management system findings management
- NT.00071 Health and safety standard: Identification, assessment and control of occupational risks
- NT.00073 Health and safety standard: Emergency preparedness and response

4. Definitions

Event: any unforeseen and unintentional occurrence or event that causes or could have caused damage to human health and/or the environment.

Accident: an event that causes personal injury (whether to employees, customers, clients, users or third parties) and/or damage to the environment:

- Worksite accident: any bodily injury that the worker suffers on the occasion of or as a consequence of the work performed for Naturgy and which is certified by medical personnel. In the event that several persons are injured and/or killed as a result of the same event, each person injured shall be considered to be one case of a worksite accident. In turn, worksite accidents are classified as follows:
 - Depending on the place where they occur:
 - Accident *in labore* or not *in itinere*: an accident which happens to the worker in the course of his/her activity, including the journeys made during the same.
 - *In itinere* accident: an accident which happens to the worker on the usual route between the workplace and his or her residence, before the start of the working day, after the end of the working day, or during part of it. Journeys made to go to lunch, even if they are not between the place of work and the employee's residence, shall be considered as *in itinere* accidents.
 - According to the absenteeism and seriousness they may cause, they are classified as follows:
 - Accident without sick leave: an accident in which the injuries caused to the worker allow him/her to continue working, or cause a period of inactivity of less than 24 hours or the time that elapses until he/she returns to the next shift (if it is longer than the previous one).
 - Accident with sick leave: an accident in which the period of inactivity due to the injuries suffered is greater than 24 hours, provided that the sick leave is prescribed by a medical professional. For the purposes of this standard, accidents resulting in sick leave are classified, based on the severity of the consequences, as follows:
 - Fatal: when the person who has had the accident dies.
 - Very Serious:



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- There is a clear and evident risk to life due to the injuries sustained in the accident.
 - There is, on the basis of the initial injuries, a presumption of future absolute incapacity for any type of work or severe disability.
- **Serious:**
 - That there is a presumption, based on the initial injuries, of future permanent incapacity in its degrees of total incapacity for usual work.
 - Presumably requiring more than 15 days of hospitalisation.
 - Those who are presumed to be incapacitated for more than 120 days and are not classified as very serious.
 - When the injuries have been classified as such by the legislation in force in the country and/or the Company's Medical Services.
 - The same accident causes injuries to more than 4 workers.
- **Minor:** all other accidents with sick leave.
- **Relapse:** Repeated periods of sick leave of a worker as a result of an accident with the same or similar pathology deriving from a previous accident are considered as relapses, provided that it occurs within a period of 180 calendar days from the date of the previous medical discharge. In this case, the total number of days lost in each period must be counted (by the general method) and added together to obtain the total, although only one accident is counted.
- **Industrial accident:** accident occurring in the different industrial processes and products or services provided that causes damage to users, customers or third parties.

Their classification according to the consequences for third parties is the same as for “worksite accidents” according to the severity of the absenteeism.

In turn, their classification according to the consequences for the environment is described in the “Environmental accident” section.
- **Environmental accident:** environmental events that generate significant damage to the environment outside the work area or the environment in general. The following are also distinguished:
 - **Environmental accident of special relevance:** an accident that has generated significant damage to the environment such that it causes a state of emergency to be decreed by the Administration, social alarm or media impact.



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- Environmental accident: an accident that has caused significant damage to the environment.

The question of whether an environmental incident is considered as an accident or incident shall be established as defined in Annex 02 of this standard.

Incident with potentially serious injury or fatality (PSIF): an event that can cause severe, permanent or long-lasting damage to the health of the worker, or even death. Annex 07 of this standard includes a guideline for the identification of this type of incident.

Root cause analysis: a systematic method to identify the root causes of incidents.

Causal factor: a circumstance or condition that contributes to the occurrence of the incident.

Root cause: It is the ultimate cause of the origin of the event, and a crucial circumstance which, if corrected, would prevent an adverse event or condition from happening again

Occupational illness: damage to health caused by exposure over time to risk factors inherent in the work activity. This is defined as being incurred as a result of work in activities specified in the regulations of each country and/or in recognised international standards.

Incident: an event that has not caused personal injury or environmental damage but which, under other circumstances, could have resulted in significant personal or environmental damage. In addition, in the case of industrial incidents, an incident includes any event arising from the different industrial processes or assets owned by Naturgy, products or services provided that causes material damage to its own facilities or to the property of users, customers or third parties.

Investigation manager (IM): Line manager or person responsible for the work, process or facility within whose scope of responsibility an occurrence takes place. In those cases where, due to the characteristics of the occurrence, more than one IM may be involved, the necessary coordination between them shall be established so that the requirements of this standard can be met.

Action plan: a set of corrective, preventive and/or improvement measures that are defined according to the causal factors or root causes identified in the investigation of an occurrence.

5. Responsibilities

All Naturgy's Business and Service units shall ensure that the general principles of this standard are applied

- EHS Senior Management Committee
 - Analyse accidents involving fatalities, as well as those which are particularly important from an environmental and/or industrial standpoint.
 - Monitoring the implementation of the action plans proposed as a result of such accidents.



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- Business Units / Corporate areas
 - Define the organisational levels to which the reporting and investigation of occurrences should be transferred, depending on the type of occurrence and the severity of the associated consequences.
 - Ensure that the process is correctly implemented.
 - Ensure that legally obligatory reports of occurrences are made to the labour, industrial and/or environmental authorities, through the official channels established in each case, assigning the corresponding responsibilities in their area.
 - Ensure that the requirements of NG.00023 are applied according to the type and severity of the event.
 - Provide the resources for the implementation of actions arising from the investigation processes.
- Investigation manager (IM):
 - Report, in accordance with the requirements established in this standard, any event occurring in his/her area of responsibility, and actively lead his/her investigation and in the implementation of the action plans defined for this purpose, ensuring compliance with the established deadlines.
 - Develop and monitor the implementation of action plans derived from the investigation.
 - Promote the creation of an atmosphere of trust and respect conducive to the reporting and investigation of incidents.
 - Develop and disseminate lessons learned to the rest of the organisation.
- Units that cover the Prevention, Environment and Industrial Safety function of the Business/Country ¹:
 - Provide advice and support to the Units in the investigation of events.
 - Participate in investigations of events in collaboration with the line.
 - Communicate in a timely manner to the industrial authority the industrial accidents required by the regulations, in those countries where it is legally mandatory.
 - Validate the classification of events on the basis of what is defined in this standard (type, severity, etc.), as well as the rest of the information associated with them, requesting the appropriate modifications.
 - Determine the significance of the damage caused by an environmental event and of any damage caused.
 - Propose and collaborate in the adoption of corrective or preventive actions.
 - Actively participate in the training required to implement the measures derived from this standard.

¹ If these units do not exist, it will be up to the business to internally define the allocation of the corresponding responsibilities.



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- Report the data requested from the corporate Industrial Safety, Prevention and Environment functions.
 - Determine the need to update internal regulations, risk assessments, environmental assessments or any other risk analysis documents based on the results of the incident investigation.
- Corporate Prevention, Health, Environment and Industrial Safety functions.
 - Establish criteria for event management (medical assistance, categorisation, reporting, investigation and follow-up).
 - Define and centralise the reporting of claims indicators and their presentation to the company's governing bodies.
 - Coordinate the implementation of global campaigns for the reduction of accidents and incidents.
- Units that cover the Medical Assistance function in the country:
 - To monitor accidents at work of Naturgy employees of which they are notified.
 - Propose and collaborate in the adoption of corrective or preventive actions, especially those for the relocation of workers in the workplace, depending on the damage to health caused by the accidents that have occurred.
 - In the appropriate cases, complete and provide the necessary official medical documentation (sick leave, discharge report and the preparation of medical reports) as well as the documents required to initiate the processing of incapacity files and administer the appropriate benefits.
 - File the original documentation corresponding to the complete medical file of all occupational accidents.
- Units that cover the Resources function of the Business/Country:
 - Make the legally obligatory communications, through the official channels established in each country, and verify the correct validation of data.
 - Report serious, very serious or fatal accidents at work to the competent labour authority within 24 hours in those countries where this is legally required.
 - Submit minor accident reports to the appropriate government agency within the required deadlines in those countries where this is mandatory.
- Units that cover the Legal Services function of the Business/Country
 - Provide the necessary legal support to the company and the workers in relation to the consequences that may arise from the events that have occurred.
- Employees
 - Communicate to their line manager/ supervisor any occurrences of any kind that may happen to them in the course of their work, as well as those affecting collaborating companies with which they may interact and which they are aware of.
 - Collaborate in the investigation of events when requested to do so.



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- Collaborate in the adoption of corrective or preventive actions that may be applicable.
- Occupational hazard prevention delegates or workers' representatives
 - Participate in the processes of investigation and analysis of accidents and relevant incidents (PSIF) occurring in the Business area and in the determination of the associated action plans.
 - Collaborate in the adoption of corrective or preventive actions.
- Obligations of all cooperating companies
 - Notify in due time and form all accidents and incidents of any kind involving their employees or companies under their responsibility, as well as investigating them, drawing up the corresponding reports and sending them to the person responsible for the works at the Naturgy group.
 - Collaborate with the management of Naturgy group companies in the improvement of preventive action through the adoption of the defined action plans.

6. Development

The process of reporting and investigating accidents and incidents is essentially aimed at understanding and analysing the causes of the events in order to establish the necessary action plans and learn the necessary lessons so that such events do not recur.

If the nature and severity of the occurrence so requires, Business or Corporate units shall, in addition to the provisions of this Standard, apply the mechanisms and measures set out in the NG.00023 Crisis management standard.

6.1. Notification

Any occurrence shall be reported as soon as possible, by the persons affected or involved, to their line manager who shall determine who the investigation manager will be (IM).

The IM (or a specific person designated by him/her) will be in charge of making the notification by generating the corresponding record through the corporate IT tool (Prosafety, or the one defined at corporate level at any given time). For events involving collaborating companies, prior validation by the IM or the Industrial Safety, Prevention and Environment function of the Business/Country is required if the original registration in Prosafety was made by a person responsible for the activity of these companies.

In this notification and based on the information available at the time of notification, the IM, supported by the Industrial Safety, Prevention and Environment function of the Business/Country, will carry out the preliminary classification of the occurrence (type, severity, etc.). In this sense:

- For occupational occurrences and for the purposes of classification under OSHA criteria, the criteria set out in Annex 01 of this standard shall be taken into account.



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- For environmental events, the criteria set out in Annex 02 of this standard shall be taken into account.
- For industrial events, the criteria set out in Annex 03 of this standard shall be taken into account.

The result of such notification shall be forwarded to those hierarchical levels and within the deadlines determined by the Business / Corporate unit.

Notwithstanding the above, the following shall be complied with:

Type / severity of the occurrence	Recipient	Max. time from occurrence of event	Channels	Manager
Any event (not specified below)	Prevention, Environment or Industrial Safety of the Business/Country (according to type of event) Hierarchical Superior of the IM	As determined by Business / Corporate unit (max. 3 business days)	Prosafety registration	IM
Worksite incidents				
Very Serious Incident Very Serious Accident / Fatality	Executive Chairman, General and Board Secretariat, EHS Management Committee Prevention Corporate Function	Immediate	Preliminary information via e-mail / telephone Prosafety registration on the next business day	General Director
Accidents of own personnel (in addition to the above notifications)	Medical Assistance, People function (Responsible for reporting to the Labour Authority)	2 days (business days)	Prosafety Registration	IM
Environmental incidents				
Accident of special significance	Executive Chairman, General and Board Secretariat, EHS Senior Management Committee Environment Corporate Function	Immediate	Preliminary information via e-mail / telephone Prosafety registration within 24 hours	General Director
Accident	Business / Country Environment function	3 days (business days)	Prosafety registration, mail	IM
Incident	Business / Country Environment function	7 days (business days)	Prosafety registration, mail	IM
Industrial occurrences				
Very Serious Incident Very Serious Accident / Fatality	Executive Chairman, General and Board Secretariat, EHS Senior Management Committee Corporate Industrial Safety function	Immediate	Preliminary information via e-mail / telephone Prosafety registration on the next business day	General Director



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In the event of worksite incidents, the prevention officers or workers' representatives shall be notified within the same deadlines in the cases established by the applicable legislation and/or the applicable company collective agreement.

In the case of industrial occurrences taking place in the receiving facilities of users where the legislation of the country establishes the need for a telephone exchange to receive emergency notifications, these will be reported/recorded in the computer system for the attention of such notifications, with an investigation report of the event for each occurrence in the manner established by each business/country.

6.2. Investigation

Every event must be investigated in order to clarify the facts, identify the causes and define and implement the appropriate action plans to avoid a recurrence and learn the necessary lessons. In the case of events occurring in activities carried out by collaborating companies at Naturgy's request, the aforementioned investigation shall be carried out independently of the investigation to be carried out by the collaborating company itself.

The IM is responsible for leading and participating in the investigation process, supported by an investigative team that will rely on the Prevention, Environment and Industrial Safety function of the Business/Country, and on the accounts and inputs of accident victims, witnesses, supervisors/safety coordinators, experts in the activity/process/facility and any other person deemed necessary, as appropriate.

Workers' representatives shall be involved in the cases determined by current legislation and/or the applicable company collective bargaining agreement, and at least in the case of accidents and relevant incidents (PSIF).

The Corporate Prevention, Health, Environment and Industrial Safety functions may collaborate in the investigation of events, either at the request of the Business/Corporate units or on their own initiative.

The investigation process will begin as soon as possible. Depending on the characteristics of the event, at the discretion of the investigation team, consideration will be given to a possible inspection of the site where the event took place to determine the circumstances under which it occurred and to gather physical evidence and begin the collection of information (photographs, diagrams, measurements, operational records, etc.), which will then be supplemented by interviews, review of procedures, tests or analysis as deemed necessary.

In the investigation process, the classification of the event defined in the notification phase must be corroborated on the basis of all the information gathered, validated by the Business/Country Prevention, Environment and Industrial Safety function and recorded by the IM in Prosafety.

Once the investigation has been completed, the corresponding investigation report shall be completed in Prosafety, in accordance with the minimum contents defined in Annex 04 of this standard. This report shall be signed in the system by both the IM



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and the Business/Country's Prevention, Environment or Industrial Safety function, as validator of the report.

For particularly important, very serious or fatal occurrences, a supplementary report may be prepared in addition, with a detailed analysis of the causes of the event. Specific investigation methodologies such as Cause Tree, TapRoot® or similar will be used for this purpose. This report shall be attached as an annex to the registration in Prosafety.

Regardless of the investigation methodology used, all causal factors that contributed to the occurrence of the event and which of them were identified as the root cause, according to the list included in Annex 05 of this standard, shall be collected and recorded in the investigation report in Prosafety.

The defined deadlines for the availability of the incident investigation report are as follows:

Type of occurrence	Deadline for investigation and report
Minor and less serious industrial and occupational incidents Minor industrial and occupational accidents	15 days
Serious and very serious industrial and occupational incidents Serious, very serious and fatal occupational and industrial accidents Environmental accident of special significance	7 days for initial preliminary report with direct causes and 15 days for final report
Other accidents and environmental incidents	21 days

In exceptional cases, this period may be extended, subject to justification by the investigation team.

The investigation process must determine the need for updating internal regulations, risk assessments, environmental assessments or any other risk analysis, safety or emergency documents. In the case of occupational accidents involving own personnel where the need to revise the risk assessment is identified, the risk assessment shall be carried out in accordance with NT.00071 and the reason for the revision shall be recorded.

Likewise, if, as a result of the investigation of an event, it is deemed necessary, the corresponding Finding shall be opened as indicated in procedure PG.00007.

6.3. Action plan

Once the event has been investigated and its causal factors and root causes have been determined, the IM, supported by the investigation team, must determine the action plan.

This action plan shall identify all corrective, preventive and/or improvement measures, as well as the persons responsible for implementing them and proposed deadlines.

The action plan shall form part of the investigation report and shall also be completed in Prosafety.



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If the person responsible for implementing a measure believes that he/she is not responsible for its implementation or that it is not formulated correctly, he/she should contact the IM to have it changed / reassigned. Such modifications/reassignments shall be registered in Prosafety.

The IM shall regularly monitor the implementation of the defined action plan.

Once the action plan has been finalised, the IM will sign off the event in Prosafety, and the Business/Country Industrial Safety, Prevention and Environment function will do the same.

6.4. Learning management

For all accidents and incidents deemed relevant due to their repetition, consequences, reproducibility, etc., and for all those included in the monthly occupational accident indicators to be reported to Naturgy's Board of Directors, the investigation team shall produce lessons learned using the format NT.00048.- FO.01 Lessons learned or a similar format identifying the causes and lessons learned. This document will not be necessary if there is already an earlier document applicable to the same facts.

The lessons learned will be disseminated to all companies through the designated channels.

7. Logs and data. Applicable formats

Log	Issue manager	File medium/place of storage	Format	File manager	Storage time
Event Reporting / Investigation	IM	Digital		Business/Country Industrial Safety, Prevention and/or Environment function	15 years
Lessons learnt	IM	Digital	NT.00048.GN-SP.ESS-FO.01	Business/Country Industrial Safety, Prevention and/or Environment function	

8. List of Annexes

- **Annex 00:** Review log
- **NT.00035-AX.01:** "Classification of occupational events based on OSHA criteria"
- **NT.00035-AX.02:** "Classification of environmental events"
- **NT.00035-AX.03:** "Classification of industrial events"
- **NT.00035-AX.04:** "Minimum contents of the event investigation report"
- **NT.00035-AX.05:** "List of causal factors/root causes"
- **NT.00035-AX.06:** "Calculation of accident rate indicators"
- **NT.00035-AX.07:** "Methodology for the identification of precursors of serious injuries and/or fatalities"

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Annex 00: Review log

Version	Date	Reasons for this version and/or summary of changes
1	14/01/2014	Newly drafted document that replaces and cancels the general procedures for reporting and analysing accidents and incidents at work and industrial incidents in force to date at Gas Natural Fenosa, and in particular: PG.00012.GN Reporting and analysis of worksite accidents and incidents PG.000.16.GN Reporting and investigation of industrial accidents. PE.00407.GN-GE.SI Generation of accidents and incidents
2	05/05/2016	Updating of unit names and managers. Updating of formats linked to the document
3	02/01/2023	General review to simplify the accident reporting process. Names of units and responsibilities are updated. It integrates as annexes NT.00036 and NT.00072, as well as PE.00010, which are repealed. Form adaptation and adaptation to organisational changes. Reviewed by standardisation and normalisation competence centre and ratified by H&S Operating Committee