

Event Management

Document Number – GOV-PROC-46

This document applies to the following site(s):

| | |
|---|--|
| All Sites <input checked="" type="checkbox"/> | |
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1.0 Overview

Events arise in all aspects of Stanwell's business. They impact, or have the potential to impact, Stanwell, Our People and the communities in which we operate.

Identifying, reporting and reviewing Events enables learning and identifying and implementing corrective and preventative actions help to prevent the recurrence of Events.

Stanwell is committed to delivering an effective and streamlined organisation-wide process for managing Events to enable the achievement of Stanwell's strategic objectives and initiatives.

Event Management:

- ensures that all Events are identified, escalated and investigated appropriately;
- enables corrective, preventative and improvement actions to be implemented ;
- helps to ensure compliance with obligations (including but not limited to legislation, regulations, policies, Standards and Codes);
- ensures Stanwell's 'right to operate';
- allows for analysis, trending and learning, which is essential for the improvement of business systems and/or business processes, the management and reduction of risk, and/or the reduction of costs; and
- provides assurance.

2.0 Purpose

The purpose of this Event Management Procedure is to outline the key principles and elements of Stanwell's approach to Event management to ensure that there is a consistent and effective response to the management of Events.

3.0 Scope

This Event Management Procedure applies to all Stanwell owned and/or operated sites and applies to all Events unless they are specifically excluded by Appendix 1 of this Procedure.

Stanwell's directors and employees, all contractors and any visitors to Stanwell's sites are to report Events in accordance with this Procedure.

4.0 Stages of Event Management

There are four crucial stages of Event Management:



4.1 Immediate Action

Once an Event has occurred, and provided that it is safe to do so, immediate action should be taken to:

- protect human life;
- reduce trauma;
- protect the environment;
- maintain system and operational safety and security;
- ensure continuity of services; and
- protect property, assets, commercial arrangements and reputation / image.

4.2 Notification

Events are to be reported as soon as reasonably possible.

Where an Event requires notification to a Regulator, any statutory timeframes associated with that notification must be adhered to.¹

4.2.1 Internal Notification

Initial notification of Events should be provided verbally (in person or by telephone) to the relevant manager or supervisor and include details of what has occurred and how it has been managed to date.

Verbal notification must occur before the Event is recorded in the Events, Audit, Risk and Compliance system (EARS).

4.2.2 Notifications to External Regulators

Any Event that is required to be (or has the potential to be) notified to an external regulator must be managed in accordance with this Procedure.

¹ Subject matter experts are responsible for ensuring notification for Events related to their area of responsibility and expertise is provided to the relevant Regulator.

Regulators that Stanwell may be required to notify (in the ordinary course of its business activities) are detailed in the table below²:

| Notification may be required to: | If: |
|---|--|
| Australian Energy Market Operator (AEMO) | there is a non-conformance with Generator Performance Standards |
| | there are changes which mean that Stanwell is unable to comply with the latest dispatch offer made to AEMO |
| | an event occurs which affects, or is likely to affect, Stanwell's generation unit capacity. |
| Australian Energy Regulator (AER) | a non-compliant offer, bid or re-bid has been made but has not been corrected within the times allowed under the <i>National Electricity Rules</i> . |
| Australian Securities and Investments Commission (ASIC) | there is a breach of, or non-conformance with, Stanwell's financial services licence (AFSL) |
| Department of Environment and Sciences (DES) | there has been serious or material environmental harm, or if serious environmental harm is threatened |
| Department of Natural Resources, Mines and Energy (DNRME) | an event occurs that requires notification under Stanwell's generation authorities and/or special approvals |
| | there is an event in relation to Stanwell's referable dams |
| | there is a non-compliance with mining tenements |
| | there is an event impacting Stanwell's petroleum pipeline licence (PPL) which requires notification |
| Electrical Safety Office (ESO) | there is a 'serious electrical incident' |
| | there is a 'dangerous electrical event' |
| Work Health and Safety Queensland (WHSQ) | there is notifiable incident, which includes the death of a person, a serious illness or injury of a person or a 'dangerous incident' |
| Office of the Australian Information Commissioner (OAIC) | there is an eligible data breach |

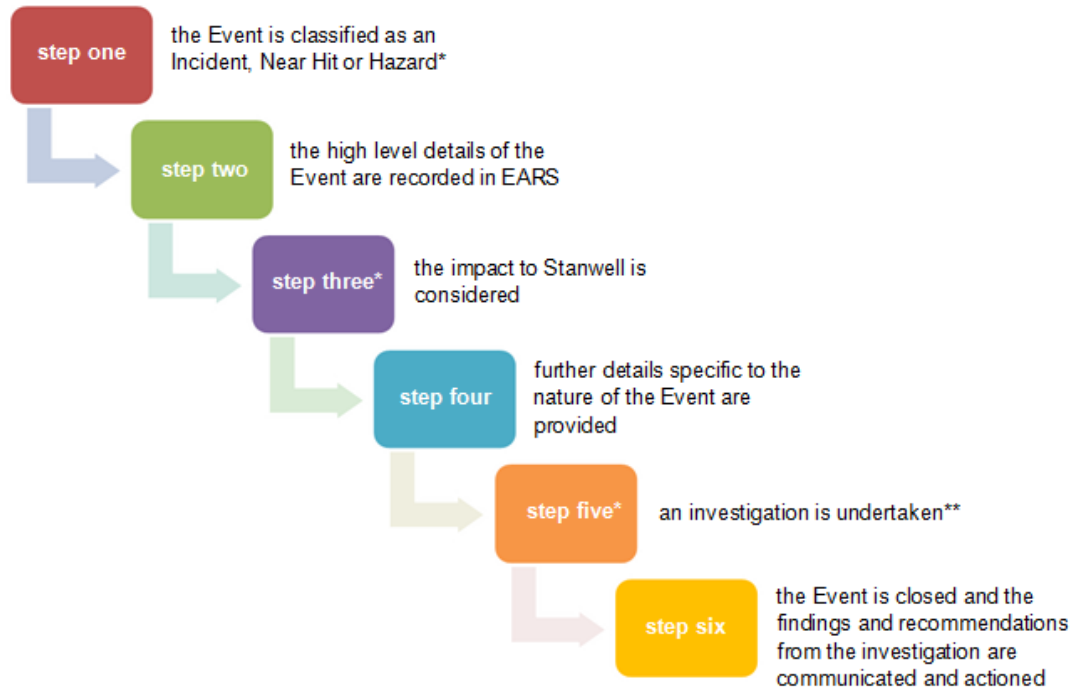
Stanwell may also be required to provide notification to its insurers of certain events which may affect one or more of Stanwell's insurance policies or give rise to a claim.

Specific Work Instructions provide further details on how to manage particular types of Events such as Health and Safety Events or Environment Events.

² This is not an exhaustive list of the notifications required to be made to Regulators.

4.3 Management of Events

Once Events have been notified either internally or externally, they must be managed appropriately. The steps involved in managing an Event are:



* where the Event is a Hazard, steps three and five are not required.

** any actions required as a result of the investigation need to be recorded in EARS.

4.3.1 Step One: Classification

The Event must firstly be classified as:

| Event Classification | Definition |
|----------------------|--|
| Incident | An unplanned occurrence which impacts Stanwell, Our People and/or the communities in which we operate. |
| Near Hit | An unplanned occurrence that has the potential to impact Stanwell, Our People and/or the communities in which we operate (but does not). |
| Hazard | A situation that, if left uncontrolled, has the potential to impact Stanwell, Our People and/or the communities in which we operate. |

The classification given to an Event determines:

- whether or not an impact assessment is needed;
- the extent of the investigation that must be completed; and
- who is initially notified of the Event after it is recorded.

At times, a single Event may be able to be classified as both an Incident and a Near Hit. If this occurs, assessments must be made on both the actual impact (Incident) and potential impact (Near Hit). The greater impact will then determine whether the Event is classified as an Incident or a Near Hit.

Example

A piece of equipment which falls from heights, narrowly misses a person walking underneath, but sustains damage on impact:

- *this can be classified as an Incident as there was an unplanned occurrence which impacted Stanwell or Our People – equipment was damaged (financial impact); and*
- *this can also be classified as a Near Hit as there was an unplanned occurrence which had the potential to impact Stanwell or Our People but did not – a person could have been injured by the falling equipment but was not (a potential health and safety impact)*

Assessments should consider what the actual financial impact was as a result of the equipment being damaged as well as what the potential health and safety impact could have been taking into consideration all of the controls that were in place at the time (e.g. PPE).

*If these assessments were to conclude that the actual financial impact was Low (<\$500,000) and the health and safety impact was Minor (first aid injury), this Event should be classified as a Near Hit (refer to **step three below for further details about assessments**).*

4.3.2 Step Two: Recording ‘high level’ Event details

Events are to be recorded in EARS as soon as reasonably practicable.³

When recording an Event in EARS, initial ‘high level’ details must be provided – what happened, when it happened and where it happened. A Responsible Supervisor must also be nominated. This person must be someone who:

- has the expertise to independently review any investigation into the Event; and
- has the necessary responsibility and accountability for ensuring corrective and preventative actions can be put in place.

The Responsible Supervisor must not be the person who would be appointed to conduct any investigation(s) of the Event.

³ If EARS is unavailable, or if computer access is limited, the Event details may be recorded on the Event Notification form (T-1987) (‘Yellowie’) and the form provided to the relevant manager or supervisor. These details must be entered into EARS as soon as practicable.

4.3.3 Step Three: Impact Assessment (Incidents and Near Hits only)

An assessment of the impact of the Event to Stanwell must be made. Assessments are based on Stanwell's Risk Evaluation Matrix GOV-STD-11 and should be made using the information available at the time:

| Incident | Near Hit |
|--|---|
| What the <i>actual</i> impact of the Incident is | What the impact of the Near Hit <i>could reasonably have been</i> taking into account all of the controls that were in place at the time of the Event |

An Event may have impacts in one or more of the following areas:

- Health and Safety
- Environment
- Financial
- Reputation
- Compliance

The impact of the Event influences a number of elements of Event Management including:

- who is provided with subsequent notification of the Event;
- the level of reporting and investigation that is required; and
- the level of sign off that is needed.

If further information is learned during or upon completion of the Event investigation, the assessment should be updated accordingly.

4.3.4 Step Four: Further Event Details

Depending on the nature of the Event, further details may specifically need to be recorded. This includes where there was (or there was the potential for) injury/illness/disease, whether the Event was a compliance issue or where the Event had security and/or environmental aspects.

Further details about what information is required is outlined in the Guide to recording an Event in EARS (19/18425) and in the specific underlying Work Instructions for managing Health and Safety Events and managing Environment Events

4.3.5 Step Five: Investigation

An Event investigation is undertaken to identify what happened and what caused the Event to occur (the root cause and contributing factors). This information is then utilised to determine corrective and preventative actions required to prevent the recurrence of a similar Event.

Investigations for all Incidents or Near Hits should be undertaken as soon as practicable following the Event. An Investigation is not required for Hazards.

Investigations should be completed within 30 days of the date on which the Event was reported to the manager or supervisor.⁴

| Event Impact | Level of Investigation Required | | |
|--------------------|--|--|--|
| | Incident (including Actual SIF and Potential SIF) | Near Hit (including Potential SIF) | Hazard |
| Severe (Level 5) | Thorough, diligent investigation required by a trained investigator following Stanwell's Incident Investigation Template T-1948. | Thorough, diligent investigation required by a trained investigator following Stanwell's Incident Investigation Template T-1948. | Impact assessment and formal investigation is not required for Hazards. Consideration should be given to the appropriateness of the current controls in place or whether any corrective and preventative actions are required to remove the hazard or mitigate its potential impact. |
| Major (Level 4) | | | |
| Moderate (Level 3) | | | |
| Minor (Level 2) | Investigation required by an appropriate subject matter expert and/or manager. | Investigation required by an appropriate subject matter expert and/or manager. | |
| Low (Level 1) | | | |

Before undertaking an Event investigation, consideration should be given to:

1. engaging Stanwell's legal team - Stanwell's legal team can advise on legal professional privilege and what is required to ensure that legal professional privilege over the investigation can be maintained (as appropriate);
2. who will conduct the investigation – is there an internal investigator with sufficient expertise to undertake the investigation, or does an external investigator need to be appointed;
3. the possible sources of information (including witnesses, experts, policies, procedures and/or records);
4. how information will be obtained and collated; and
5. the tasks and/or timeframes for the investigation that should be set for obtaining the information.

It is important that all investigations are factual, and are not based on speculation or opinion.

4.3.5.1 Investigation Recommendations

Once the root cause and contributing factors of an Event have been identified, investigators make recommendations to:

- identify what is required to correct what has occurred (corrective measures);
- identify what is required to prevent the Event from occurring again (preventative measures); and/or
- suggest improvements to procedures and/or processes.

⁴ An investigation may take longer than 30 days to close out where external parties are involved in the investigation (for example, Workplace Health and Safety Queensland). Where this is the case, or is likely to be the case, the Responsible Supervisor should advise the responsible Executive General Manager as soon as possible.

Corrective and/or preventative measures may be either interim or long-term measures, and can include implementing new controls, modifying existing controls or implementing actions to maintain existing controls. All material Actions must be recorded in EARS.

Actions

Before an Action is recorded in EARS:

- *it must be agreed with the Responsible Supervisor and/or any other key stakeholders that the recommended actions are appropriate to be implemented;*
- *consideration must be given to the appropriate amount of time and effort required for the recommended actions to be completed so that realistic due dates for completion can be set; and*
- *where possible, the person identified as the person to undertake or complete the Action should be advised of their nomination (either verbally or by email).*

Once entered in EARS, any modifications or changes to an Action, including to a due date, must first be discussed and agreed with the Responsible Supervisor and/or key stakeholders.

Actions must be formally closed out on or before the nominated due date. Actions must only be approved and closed out where the nominated Action Approving Officer considers that the Action has been completed in accordance with expectations.

Refer to GOV-WI-31 Recording an Event in EARS for further guidance around Action management.

4.4 Event Close Out

Events must be formally closed out:

- for Incidents and Near Hits, this should occur as soon as the investigation has been completed (and associated reporting requirements met) and requires an independent person (someone who did not complete the investigation) to review the investigation report and endorse its findings and recommendations.
- for Hazards, this can occur at the time the Hazard is entered into EARS provided that consideration has been given to the appropriateness of the current controls in place and whether any corrective and preventative actions are required to remove the hazard or mitigate its potential impact.

Prior to closing the Event out, any required Actions must be recorded. Actions do not have to be completed before an Event is formally closed out.⁵

Once the Event has been formally closed, the Event outcomes (the findings and recommendations of the investigation) should then be communicated as appropriate.

⁵ Refer to Recording an Event in the Event in EARS (GOV-WI-31) for further details on action management.

Additional Event Notifications

Where an individual's safety behaviour is identified as a contributing factor to a safety outcome, a Safety Fair and Just Response may be initiated (refer to the Safety Fair and Just Procedure OHS-PROC-23).

Where a contractor breaches Stanwell's Code of Conduct or Safeguards (for example, by returning a positive alcohol or other drudges test), the breach must be reported to Procurement and to the relevant Contract Manager.

5.0 Event Oversight

The Corrective Action Review Board (CARB) has been established to ensure quality output from incident investigations with effective and efficient recommendations and corrective actions for prevention, continual improvement and organisational learnings.

Incident investigations subject to CARB review include:

- where a similar or repeat significant event has occurred within the last 2 years;
- where the Event has resulted in (or had the potential to result in) significant consequence(s) including:
 - Serious Injury or Fatality;
 - a Recordable Injury;
 - an environmental event which is notifiable to the regulator and is likely to result in environmental nuisance or harm; or
 - an assurance event which meets the set materiality/vulnerability criteria.⁶
- where a very high level of investigation involving an external investigator has been completed following an Event;
- where the recommendations arising from the investigation are likely to require a high level of resources which has the potential to impact on strategic business planning;
- Incidents or Near Hits which may have occurred due to a breach of regulation or which may result in a prosecution;
- where the Operations Leadership Team have requested a CARB Investigation into an emerging trend of occurrences; and
- any other investigation which the Operations Leadership Team have unanimously agreed to review.

In addition to the reporting, trending and analysis undertaken by specific business units (including Health and Safety and Environment and Assurance), other measures/processes are in place to provide oversight of Events including:

- tailored notifications are in place to ensure that key stakeholders have oversight of Events which are relevant to their particular divisions or teams as they are recorded within EARS;
- compliance issue and breaches are reported in accordance with the Stanwell's Compliance Breach Reporting Mechanism⁷; and

⁶ Assurance events are not restricted to health, safety or environmental events.

⁷ Refer to the Compliance and Regulatory Management Policy (GOV-POL-20) and the Compliance and Regulatory Management Procedure (GOC-PROC-28).

- scheduled and/or ad hoc audits being conducted on an as needs basis⁸.

6.0 Responsibilities

Employees and Contractors

- Report and record all Events in accordance with this Event Management Procedure.
- Seek guidance from SMEs and/or Managers and/or Supervisor as required.

Executive General Managers, General Managers, Managers and Supervisors

- Ensure the business appropriately implements this Event Management Procedure.
- Ensure that Events are being reported and recorded in accordance with this Event Management Procedure.
- Ensure that Actions are managed in accordance with this Event Management Procedure and associated guides and Work Instructions (including that due dates are met).
- Provide advice and guidance about Event Management and Action Management as required.

7.0 Review, Consultation and Communication

The review and appropriate consultation of this document is required every three years and at other times, if any significant organisational changes warrants a change in this document.

This Procedure will be:

- communicated to key stakeholders; and
- made available on Stanwell's intranet.

8.0 References

| | |
|-------------|--|
| 19/18425 | Guide to recording an Event in EARS |
| GOV-POL-20 | Compliance and Regulatory Management Policy |
| GOV-PROC-28 | Compliance and Regulatory Management Procedure |
| GOV-POL-30 | Code of Conduct – The way we work at Stanwell |
| GOV-POL-37 | Business Resilience and Risk Management Policy |
| GOV-PROC-37 | Risk Management Framework |

⁸ These audits may be internal or external audits. They may focus entirely on Event management or may consider Event management as part of a broader audit scope.

| | |
|-------------|---|
| GOV-STD-11 | Risk Evaluation Matrix |
| GOV-POL-29 | Whistleblower Protection Policy |
| GOV-PROC-36 | Protected Disclosures and Complaints Procedure |
| HSE-WI-01 | Drafting and Issuing HSE Advices and Event Communications |
| OHS-PROC-23 | Safety Fair and Just Response |
| PEO-POL-21 | Fair Treatment Policy |
| PEO-PROC-55 | Fair Treatment Procedure |
| PEO-PROC-16 | Managing Performance and Conduct Procedure |

9.0 Definitions

| | |
|------------------------------------|---|
| Compliance Breach | Acts or omissions by Stanwell and/or Our People resulting in the failure by Stanwell and/or Our People to meet their compliance obligation(s). |
| EARS | Stanwell's integrated Events, Audit, Risk and Compliance system. EARS is the tool used by Our People across all our sites to effectively and efficiently manage and record Events. EARS is accessed electronically via GenNet, Stanwell's intranet. |
| Event | An unplanned occurrence that impacts, or has the potential to impact, Stanwell or Our People. An Event can be classified as an Incident, Near Hit or a Hazard. |
| Event Management | The process for managing Events as detailed within this Procedure which includes immediate action (if required), notification, recording, investigation, and oversight. |
| Hazard | A situation that, if left uncontrolled, has the potential to impact Stanwell and/or Our People. |
| Incident | An unplanned occurrence that impacts Stanwell and/or Our People. |
| Near Hit | An unplanned occurrence that has the potential to impact Stanwell and/or Our People. |
| Our People | Stanwell's directors and employees and all contractors working for or at Stanwell's operational or non-operational sites, in their capacity as a director, employee or contractor. |
| Subject Matter Expert (SME) | A person who has specialist or extensive knowledge in one or more of Stanwell's functional areas. |

10.0 Revision History

| Rev. No. | Rev. Date | Revision Description | Author | Endorse/Check | Approved. By |
|----------|------------|---|----------|---------------|--------------|
| 0 | 18.05.2015 | New document prepared to support the Event Management Strategy (GOV-STR-02). | M. Maraj | K. Biggs | M. O'Rourke |
| 1 | 30.11.2018 | Scheduled review. Revised version of the Procedure has been simplified to outline only high level concepts and more specific details have been moved into supporting Work Instructions. | M Maraj | P Ware | M O'Rourke |

11.0 Appendix 1 – Exclusions from Scope

This Event Procedure does not apply to the following Events:

- HR/IR issues (including bullying, harassment and discrimination complaints, performance management issues, union issues etc.) are to be managed in accordance with applicable policies and procedures (e.g. Managing Performance and Conduct Procedure (PEO-PROC-16), Fair Treatment Policy (PEO-POL-21) and Fair Treatment Procedure (PEO-PROC-55)).
- Protected Disclosures and Complaints (including Reportable Conduct) are to be managed in accordance with the Whistleblower Protection Policy (GOV-POL-29) and the Protected Disclosures and Complaints Procedure (GOV-PROC-36).
- Expressions of dissatisfaction by a key opinion leader, near neighbour or influential community stakeholder about one or more of Stanwell's asset sits or projects (Community Complaints) are to be reported to the General Manager Stakeholder Engagement and/or the Community & Indigenous Relations Manager and managed in accordance with Stanwell's Complaint Handling Procedure (STM-PROC-16). Depending on the severity, it is at the discretion of the General Manager Stakeholder Engagement and/or the Community & Industrial Relations Manager as to whether the complaint is recorded in EARS unless the complaint involves environmental aspects or issues. Where that is the case, the complaint must be managed in accordance with section 13.1.5 of this Procedure (which includes recording the complaint in EARS).⁹
- Legal disputes are to be managed by Stanwell's Legal Team (including disputes for which external legal advisors have been engaged).
- Meandu Mine issues where the Senior Site Executive (SSE) (currently Downer EDI) has the applicable obligation in accordance with the *Coal Mining Safety and Health Act 1999* (Qld) are to be managed in accordance with Downer EDI's processes.
- Contained environmental Events at Meandu Mine that do not impact (or could reasonably have the potential to impact) Stanwell's compliance with its Environmental Authority and/or any other environmental obligations are to be managed in accordance with Downer EDI's processes. However, where there is, or could be, an impact on Stanwell's environmental obligations, the Events must be entered into EARS.
- Plant defects or lost production issues are to be managed by a site's Operations Maintenance System; where a plant, generation or equipment Event occurs that results in a financial impact (cost of physical damage but excluding cost of lost revenue) or generation loss impact (as defined in the site operations risk matrix) that is 'Moderate' or above or also has health and safety, environment, reputational and/or compliance impacts, it should be managed in accordance with this Event Management Procedure.
- ICT issues that are ordinarily managed by raising a Service Desk request should continue to be managed in that way (e.g. where an individual is experiencing difficulty sending emails or is requires different permissions); however:
 - where an ICT event impacts one or more sites (including the corporate offices) or impacts the whole business, it should be managed in accordance with the incident escalation process and this Event Management Procedure;
 - where an IT security related event occurs, it should be managed in accordance with the Security Framework and this Event Management Procedure (refer to section 13.5 for further details).
- Shareholding Minister communications (including responding to unexpected requests from shareholding Ministers) are to be managed by the Stakeholder Engagement team in accordance with their business as usual processes.

⁹ It is a requirement of Stanwell's Environmental Authorities that environmental complaints are recorded. Stanwell utilises EARS as its tool to record environmental complaints.

- Breaches of Stanwell's internal policies, procedures, work instructions or delegations that have an actual impact of 'Low' or a potential tolerable impact to our business. Note however that any breaches of Stanwell's Safeguards, Stanwell's Trading Risk Management Policy or Stanwell's Financial Risk Management Policy are to be managed in accordance with this Event Management Procedure, irrespective of impact.
- Emergencies, incidents and/or crises. Any emergency, incident and/or crisis must be managed in accordance with the applicable Emergency Response, Incident Response and/or Crisis Response process. It is at the discretion of the relevant Emergency Controller (or equivalent), Incident Manager or Crisis Leader for the particular emergency, incident or crisis as to whether the emergency, incident or crisis is subsequently recorded in EARS (and managed in accordance with this Event Management Procedure)