PRECISION CONCEPTS Solutions That Matter.	**Incident Reporting Standard**	**Revision #** 000
Prepared By: Mikayla Simphaly		**Effective Date:** 09/01/2026

1.0 Purpose

1.1 The purpose of this standard is to establish requirements for prompt, consistent reporting of all EHS incidents to ensure agency, corporate, and insurance reporting obligations are fulfilled within required timeframes.

2.0 Scope

2.1 This standard applies to all Precision Concepts Internation (PCI) employees, contractors, and visitors while as PCI operated locations. All PCI employees and contractors while conducting business at alternative locations, include while operating company vehicles are also covered by this policy.

3.0 Definitions

3.1 Incident – An undesired and unexpected event that harms people, property, or the environment

3.2 OSHA Recordable – An injury, illness, or hearing loss defined as recordable by the Occupational Safety and Health Administration 29 CFR 1904 Recordkeeping Standards

3.3 Catastrophic Incident – Any work-related incident that involves a fatality, one or more employees admitted to the hospital, an amputation, or loss of an eye

3.4 First Aid Case – An injury or illness defined as first aid by the Occupational Safety and Health Administration 29 CR1904 Recordkeeping Standards (including, but not limited to: use of a band aid, ice bag, flushing of the eyes to remove a foreign body, removing a splinter or foreign body from the skin using tweezers, etc.)

3.5 Report Only – A work-related incident in which an employee reports an injury, pain, discomfort of any type, but does not receive any treatment

3.6 Near Miss Incident – An incident that nearly causes an injury or has the potential to cause an injury

3.7 Environmental Incident – The release of an oil, chemical, or hazardous waste to the environment, any amount. Fire, flood, tornado, or other weather-related impact that may disrupt business or impact customer product or supply chain

3.8 Notice of Violation (NOV) – Any letter or notice received from a government or regulatory authority (i.e., OSHA, EPA, state environmental agency, DOT, Fire Marshal, etc.) alleging violation of law, regulation, or permit

3.9 Security Incident – An event which compromises personnel, location, or value chain security and integrity, including sabotage, theft of physical or intellectual proper, bomb threats, product tampering, kidnapping, IT breach, vehicle hijacking, vandalism of PCI property, or trespassing on PCI property

3.10 Property Damage Incident – An undesired event that damages physical company property. This includes all incidents involving a fire

3.11 Adverse Media Incident – An incident or event involving any company facility, product, or the company name which is reported on by the media (television, newspaper, internet, etc.) and could adversely affect the company

3.12 Employee – Full-time or part-time worker paid and supervised by PCI

3.13 Temporary Staffing – An employee paid by an agency, but working for and supervised by PCI

3.14 Contractor – A person working for and paid by another company performing a specific task for the company. Contractors are not directly supervised by a PCI employee

3.15 Executive Leadership Time (ELT) – The group of key executive responsible for the operation of the company

3.16 Corporate EHS Team – The group responsible for deploying the EHS system and providing EHS guidance to the operating locations

3.17 Plant Safety Committee – The location organization responsible for day-to-day EHS activities, maintaining EHS standards, providing for a safe operating environment and for continuous EHS improvement

3.18 Safety First Report – Method of reporting injuries and incidents to all locations, specifically OSHA recordable injuries and other incidents as appropriate

4.0 Responsibility

4.1 The Corporate EHS Team is responsible for

4.1.1 Preparing and sending safety reports, adhering to OSHA requirements

4.1.2 Determining incident classifications and reporting requirements

4.1.3 Maintaining corporate EHS data

4.1.4 Periodically reviewing this policy at least annually, and updating as needed

4.2 The General Manager is responsible for ensuring the timeline reporting of EHS incidents.

4.3 Plant Safety Committees are responsible for developing and maintaining an incident reporting procedure and the tracking and reporting of local EHS data.

4.4 The Supervisor or Manager of the injured or involved employee(s) is responsible for completing the first report of injury / incident report.

4.5 Employees are responsible for reporting all EHS incidents immediately to their manager or supervisor.

5.0 Reference Documents

5.1 29 CFR 1904 Occupational Safety and Health Administration (OSHA) Recordkeeping Standards

5.2 Employee Handbook

6.0 General Requirements

6.1 Each location shall develop a written program that describes their process to ensure that the requirements of this standard are met and also includes plant specific information such as emergency contact numbers, methods of handling care, and procedures related to an incident.

6.2 Each location is required to track all EHS incidents. Additionally, locations must track first aid cases, near-miss incidents, and any other data required by the company or the location deems important.

6.3 Upon notification that an incident has occurred, the designated employee (i.e., supervisor, lead, etc.) shall immediately attend to the medical needs of employees and verify that the area is safe and preserved for investigation.

6.4 All incidents will be documented using the incident report in Appendix A.

7.0 Incident Reporting Requirements

7.1 The following EHS incidents must be reported:

7.1.1 Catastrophic Incidents

7.1.2 OSHA Recordable injuries, illnesses, and hearing losses; or any injury or illness that the classification is unknown or in question

7.1.3 Motor Vehicle Accidents (MVA)

7.1.4 Environmental Incidents

7.1.5 Notices of Violation (NOV)

7.1.6 Security Incidents

7.1.7 Adverse Media Incidents

7.1.8 Property Damage Incidents

7.1.9 Any incident or injury below first aid

7.2 First aid cases and near misses are also required to be reported locally. The sites must require all employees to report all first aid and near misses immediately to the local management.

7.2.1 For First Aid Cases, the incident description will be reported to the Corporate EHS Team.

7.2.2 For Near Miss Incidents, the incident description will be reported via the near miss reporting tracker locally. These are communicated to the overall Corporate EHS Team via weekly KPI review calls.

7.3 All EHS incidents listed in Section 7.1 shall be immediately reported by the General Manager or other responsible person to the Corporate EHS Team.

7.4 The Corporate EHS Team shall make the final determination on incident classifications and if the incident is reportable to a government agency.

7.5 Once an incident has been categorized as one of the incident types listed in Section 7.1, the General Manager or other responsible person shall email the incident report to the Corporate EHS team.

7.6 The incident report must contain the following information:

7.6.1 When and where the incident occurred

7.6.2 People, materials, equipment, chemicals, etc.

7.6.3 Status of injured person and treatment

7.6.4 Result or impact of the incident (i.e., injury sustained, among of material spilled, etc.)

7.6.5 Causal factors involved in the incident (usually preliminary since investigations are usually not completed)

7.7 The Corporate EHS Team is responsible for ensuring that any incident requiring reporting to a government agency is completed per applicable laws or regulations.

7.8 The local HR team is responsible for reporting all Workers' Compensation applicable incidents to the Worker’s Compensation Insurance Carrier.

7.9 The HR Team with support of the Corporate EHS Team will update and maintain the corporate injury and incident electronic files.

7.10 The OSHA 301 & 300 will be updated within 7 calendar days of a recordable injury by the HR Team or plant designee.

8.0 Injury Reporting Requirements

8.1 The following are included in injury reporting: catastrophic incidents, OSHA recordable injuries, illnesses, and hearing losses, motor vehicle accidents with injury, or any injury or illness that the classification is unknown or in question.

8.2 The first priority in addressing an employee injury is medical care. The employee's supervisor is responsible for ensuring that proper medical care is coordinated.

8.3 The responsible supervisor shall notify the General Manager and Plant Safety Committee and complete the first report of injury (incident report) as soon as possible after the incident.

8.4 The General Manager or other responsible person shall email the first report of injury (incident report) as soon as possible after the incident to the Corporate EHS Team.

8.5 The completed incident report must contain the information listed in Section 7.6.

9.0 Environmental Incident Reporting Requirements

9.1 All environmental incidents shall be reported to the Corporate EHS Team via email as soon as possible, but within 8 hours of occurrence for the purposes of classification and to determine if the incident is reportable to a government agency.

9.2 The completed incident report must contain the information listed in Section 7.6.

10.0 Security Incident Reporting Requirements

10.1 All security incidents shall be reported to the Corporate EHS Team via email as soon as possible, but within 8 hours of occurrence.

10.2 The completed incident report must contain the information listed in Section 7.6.

11.0 Adverse Media Security Incident Reporting Requirements

11.1 All adverse media incidents shall be reported to the Corporate EHS Team via email as soon as possible, but within 8 hours of occurrence.

11.2 The completed incident report must contain the information listed in Section 7.6.

12.0 Motor Vehicle Accidents (MVA) Reporting Requirements

12.1 All MVA's involving injures shall be reported as required in Section 9.0.

12.2 All MVA's not involving injuries shall be reported to their supervisor and the Corporate EHS Team via email as soon as possible, but within 24 hours of occurrence.

12.3 The completed incident report must contain the information listed in Section 7.6.

13.0 Notices of Violation (NOV) Reporting Requirements

13.1 All notices of violation (NOV) shall be reported to the Corporate EHS Team via email within 4 hours of being notified.

13.2 The completed incident report must contain the information listed in Section 7.6.

14.0 Property Damage Incident Reporting Requirements

14.1 All property damage incidents shall be reported to the Corporate EHS Team via email as soon as possible, but within 24 hours of occurrence incident report must be completed.

14.2 The completed incident report must contain the information listed in Section 7.6.

15.0 Follow Up Communication

15.1 After event analysis, escalation and wider distribution will be determined on a case-by-case basis by Corporate EHS.

16.0 EHS Data Reporting Requirements

16.1 Locations are required to report all EHS data on a continuous basis. EHS leading and lagging measures will be reported for the month by the 5th working day of the following month, contingent on hours worked availability.

17.0 Communication and Training

17.1 The Corporate EHS Team is responsible for making sure that all locations understand the requirements of this standard.

17.2 Top local site management authority is responsible for the implementation and delegation.

17.3 Local HR Teams are responsible for Workers' Compensation reporting and follow-up with medical providers as needed.

17.4 The locations are responsible to conduct initial and periodic training for employees on the relevant requirements of this standard.

18.0 Appendices

18.1 Appendix A – Incident Report

18.2 Appendix B – Safety First Report Template

19.0 Revision History

Revision #	Date	Reason for Change(s) / Description
000	02/22/2016	Original Issue
001	01/01/2024	Logo, admin update, revise procedure to include smart sheet and OSHA 301
002	09/01/2026	Rebrand from Comar to PCI; Replaced all instances of Plant Manager to General Manager; Updated all reporting requirements to reflect the current practices at PCI

20.0 Revision Cycle

Revision Version:	002
Effective Date:	09/01/2026
Electronically Approved By:	Mary Connery, VP of Human Resources
Next Review By:	09/01/2027