

 DEE CRAMER HEATING / COOLING / SHEET METAL Dedicated People. Delivering Quality.	Dee Cramer, Inc.		Doc No:	INCIDENTS
	Safety Management System		Initial Issue Date:	1/1/2017
			Revision Date:	6/23/2026
INCIDENT & NEAR MISS INVESTIGATION			Revision No.	1.0
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Purpose

The purpose of this program is to have effective procedures for reporting, investigating, and evaluating incidents and near misses to prevent further occurrences.

Scope

This program applies to Dee Cramer, Inc.'s employees.

Definitions

Contributing Factor – Any condition, behavior, or circumstance that played a role in the occurrence of an incident or near miss but was not the primary cause.

Corrective Action – A specific measure implemented to eliminate or control hazards identified during an investigation, aimed at preventing recurrence of similar events.

First Aid – Dressing on a minor cut, removal of a splinter, typically treatment for household type injuries.

Incident – An unplanned event that results in injury, illness, property damage, or other.

Investigation – A systematic process of gathering facts, analyzing causes, and identifying corrective actions to prevent recurrence of incidents or near misses.

Lost Workday Case (LWDC) – An injury that results in an employee being unfit to perform any work on any day after the occurrence of an occupational injury.

Near Miss – An unplanned event that did not result in an injury, illness, or property damage but had the potential to do so under slightly different circumstances.

Number of Lost or Restricted Workdays – The number of days, other than the day of occupational injury and the day of return, missed from scheduled work due to being unfit for work or medically restricted to the point that the essential functions of a position cannot be worked.

Occupational Illness – Any abnormal condition or disorder caused by exposure to environmental factors while performing work that resulted in medical treatment by a physician for a skin disorder, respiratory condition, poisoning, hearing loss or other disease (frostbite, heatstroke, sunstroke, welding flash, diseases caused by parasites, etc.). Do not include minor treatments (first aid) for illnesses.

Occupational Injury – An injury which results from a work-related activity.

Recordable Medical Case (RMC) – An occupational injury more severe than first aid that requires advanced treatment (such as fractures, more than one stitch, prescription medication of more than

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one dose, unconsciousness, removal of foreign body embedded in eye (not flushing), admission to a hospital for more than observation purposes) and yet results in no lost work time beyond the day of injury.

Restricted Workday Case (RWDC) – An occupational injury which results in a person being unfit for essential functions of the regular job on any day after the injury but where there is no time lost beyond the day of injury. An example would include an injured associate who is kept at work but not performing within the essential functions of their regular job.

Root Cause – The underlying factor(s) that led to the incident or near miss, which, if corrected will prevent recurrence. These often involve system failures, inadequate controls, or human factors

Work- or Work-Related Activity – All incidents that occur in work related activities during work hours, field visits, etc. are reportable and are to be included if the occupational injury or illness is more serious than requiring simple first aid.

Responsibilities

Supervisors/Managers

- Investigates (or assists in) incident investigations
- Corrects non-conformances
- Accompany injured employees to the medical provider for initial treatment.

Safety Department

- Ensure investigations are conducted and assists in identifying corrective actions.

Employees

- Report incidents (including near miss, injury, illness, spill or property damage) immediately after they occur.
 - If their immediate supervisor is not available, the employee is then to immediately notify the project manager.
- If trained and qualified perform first aid techniques to control the degree of loss during the immediate post-incident phase.

Procedure

Investigations of incidents, near misses and non-conformances are used to determine the root cause and corrective actions necessary to prevent similar incidents or non-conformances.

The Safety Team shall be immediately notified for:

- Near miss incidents with the potential to harm people, the environment, or assets
- Work related injuries or illnesses; Property damage including vehicle incidents
- Hazardous chemical spillage, loss of containment and contamination
- Non-conformance to safety or environmental rules, policies, or standards

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The supervisor shall make the necessary notifications and begin the incident investigation process.

The scene of any incidents should be closed off and kept "as is" at the time of the incident. This is vital for effective incident investigation. Pictures and videos are vital to the investigation process.

All incidents are investigated promptly. When Dee Cramer, Inc. has been notified of a work-related incident qualified personnel shall complete an investigation of the incident. The investigation should take place as soon as possible after the incident.

Upon notification of the incident the investigator of the incident shall interview all witnesses as soon as possible to establish chronological order of the incident. Factors such as date, time and location shall be documented upon taking the witness statement.

All reports of incidents can be completed through the Safety App which shall notify:

- President
- Vice President of People, Culture & Safety
- Safety Director
- Safety Manager

Reporting of the incident must occur in a specified manner based on site specific requirements and the reporting sequence shall be posted.

EXTERNAL INCIDENT NOTIFICATION MATRIX

TYPE OF INCIDENT	WHO TO NOTIFY	WHEN	INCIDENT REPORT FORM
Minor First Aid	Owner Client	24 hrs.	Yes
Injury Above Minor First Aid	911 / Site Medical Response / Owner Client	ASAP	Yes
Fatality/Hospitalization	MIOSHA / Owner Client	Within 8 hrs./Within 24 hrs.	Yes
Fire / Explosion	911 / Site Medical Response / Owner Client	ASAP	Yes
Reportable Spill	Site Environmental / Owner Client	Within 24 hrs.	Yes
Property/Vehicle Damage	Owner Client	Within 24 hrs.	Yes

INTERNAL INCIDENT NOTIFICATION MATRIX

TYPE OF INCIDENT	WHO TO NOTIFY VERBALLY	WHEN	INCIDENT REPORT FORM
Minor First Aid	Supervisor then Safety Director	ASAP	Yes
Injury Above Minor First Aid	Supervisor then Safety Director	ASAP	Yes
As Required Injury Reporting	Safety Director then HR then President	ASAP	Yes
Fire / Explosion	Safety Director	ASAP	Yes
Reportable Spill	Safety Director	ASAP	Yes
Property/Vehicle Damage	Fleet Mgr then Safety Director then CFO	ASAP	Yes

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Incident Report – Via Safety App

Incident investigations are documented. After the investigation of the incident, Dee Cramer, Inc. shall prepare a written report, via the Safety App including the description of the incident, any evidence collected during the investigation, an explanation of the causes of the incident and corrective actions required or recommended. In addition, a detailed narrative statement concerning the events. The format of the narrative report may include an introduction, methodology, summary of the incident, Incident Review Team member names, narrative of the event, findings, and recommendations. Photographs, witness statements, drawings, etc. should be included.

The supervisor completes the Dee Cramer, Inc. incident report via the Safety App the below steps will be taken when beginning an incident investigation.

- Secure the area as quickly as possible to retain area in the same condition at the time of the incident
- Notify management by phone according to the Incident Notification Matrix
- Identify potential witnesses
- Use investigation tools, as needed (camera, drawings, video, etc.)
- Tag out for evidence any equipment that was involved
- Interview witnesses (including the effected employee) and obtain written, signed statements and e-mail or fax to the Dee Cramer, Inc. Safety Director
- Implement any immediate corrective actions needed

Incident Review Team and Incident Investigation Report

Contributing factors and/or root causes are identified and documented. The written incident investigation report shall include an explanation of the contributing factors or root causes of the incident that were identified during the investigation.

All incidents shall be investigated, and the extent of such investigation shall reflect the seriousness of the incident utilizing a root cause analysis process or other similar method determined by the Dee Cramer, Inc. Safety Department. They will form an Incident Review Team that participates in the determination of the final root cause investigative incident report. The team consists of representatives and management as assigned by the Safety Department.

All information related to the incident and included in the incident report such as people, equipment, and materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, etc. shall be reviewed by the incident review team. Evidence such as people, positions of equipment, parts, and papers must be preserved, secured, and collected through notes, photographs, witness statements, flagging, and impoundment of documents and equipment. All shall be dated.

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Witness interviews and statements must be collected. Locating witnesses, ensuring unbiased testimony, obtaining appropriate interview locations, and use of trained interviewers should be detailed.

The need for follow-up interviews should also be addressed. All items shall be dated. The final incident investigation report consists of findings with critical factors, evidence, corrective actions, responsible parties, and timelines for corrective action completion.

Corrective Actions

Corrective actions are identified and implemented to prevent a recurrence of the incident.

The incident investigation report shall include any immediate corrective actions that were taken as well as any long-term actions that are required to prevent the recurrence of the incident. Individuals will be assigned responsibilities related to the corrective actions, and these actions will be tracked to closure.

Site Managers are held accountable for closing corrective actions. Corrective actions for safety improvement input are posted at each site and tracked by the Dee Cramer, Inc. Safety Department to ensure timely follow up and completion. Corrective actions are also used as needed for revisions to site specific safety plans and the Dee Cramer, Inc. Safety and Health Management System.

Training

Investigation team members are provided with training in investigation techniques. Members of the incident investigation or review team shall be qualified and competent individuals. Dee Cramer, Inc. shall provide training on the investigation techniques used during an incident investigation. Training shall occur prior to responsibilities to response or investigation duties are assigned.

Training requirements related to incident investigation and reporting shall include:

- Awareness
- First Responder Responsibilities
- The Initial Investigation at the Accident Scene
- Managing the Accident Investigation
- Collecting Data
- Analyzing Data
- Developing Conclusions and Judgments of Need
- Reporting the Results

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Management of Change		
Date	Description of Change	Name
6/23/2026	General process flow updates.	Madelyn Nichols