BUSINESS PROCEDURE

Event Management

HSE-PROC-17

This document applies to:

All Sites ☒

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1.0 Purpose/Scope

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 consistent and effective identification of and response to events.

Events and potential events can arise in all aspects of Stanwell Corporation Limited's ('Stanwell') business. They impact, or have the potential to impact, Stanwell, our people, the environment, our assets, our reputation, and the communities in which Stanwell operates.
Stanwell's Event management processes:

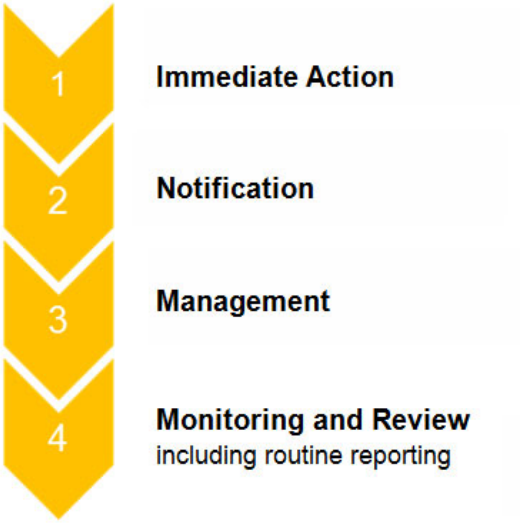
- Ensures that all events are identified, reported, escalated, and investigated appropriately.
- Enables corrective, preventative, and improvement actions to be communicated and implemented.
- Helps to ensure compliance with obligations, which include, but are not limited to, legislation, regulations, policies, Standards and Codes.
- Ensures Stanwell's 'right to operate'.
- Allows analysis and trending, and enables organisational learning, which is essential to improve business systems and processes, to reduce risks and improve their management, and potentially reduce costs and increase efficiency.
- Provides assurance.

This Procedure applies to all Business as Usual (BUA) events (refer to Stanwell Event Evaluation and Escalation (GOV-STD-32)) at Stanwell owned and/or operated sites unless they are specifically excluded by Appendix 1 of this Procedure. Business as Usual events are events that are ranked as a Low, Minor or Moderate risk under Stanwell's Risk Evaluation Matrix (GOV-STD-11). Any emergency, incident and/or crisis is to be managed in accordance with Stanwell's business continuity framework and any location specific Emergency Response, Incident Response and/or Crisis Response process

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

2.0 Stages of Event Management

There are four crucial stages in event management:



2.1 Immediate Action

Once an event has occurred, and if 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.
- Preserve and / or record evidence.
- Protect property, assets, commercial arrangements, and reputation / image.

2.2 Notification

All events are to be reported as soon as reasonably possible.

All events (those that are not excluded as listed in Appendix 1), are to be entered into the Events, Audit, Risk and Compliance system (EARS) as soon as reasonably possible.

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

2.2.1 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).

2.2.2 Notifications to External Regulators

Any event that is, or has the potential to be, notifiable to an external Regulator must be managed in accordance with this Procedure. This includes asset-related events.

Subject matter experts (SME) are responsible for ensuring that notification of events related to their area of responsibility and expertise is provided to the relevant Regulator.

Prior to any formal notification to an external regulator, contact must be made with a representative of the Stanwell Senior Management and/or the Legal team.

Stanwell's Regulators are detailed in the table below[1]:

Notification may be required to:	If:
Australian Energy Market Operator (AEMO)	There is a non-conformance with a Generator Performance Standard.
	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 generating unit capacity.
Australian Energy Regulator (AER)	There is a non-compliant offer, or a bid or re-bid has been made but has not been corrected within the times allowed under the National Electricity Rules.
Australian Securities and Investments Commission	There is a breach of, or non-conformance with Stanwell's financial services licence (AFSL).

[1] This is not an exhaustive list of the notifications required to be made to Regulators.

(ASIC)	
Department of Environment and Science (DES)	There has been a breach of an Environmental Authority (EA) or environmental permit held by Stanwell. There has been actual serious or material environmental harm, or if serious environmental harm is threatened.
Department of Energy and Public Works	An event occurs that requires notification under Stanwell's generation authorities and / or special approvals.
Department of Resources	There is a non-compliance with mining tenements.
Department of Regional Development, Manufacturing and Water	There is an event in relation to Stanwell's referable dams.
Petroleum and Gas Inspectorate	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.

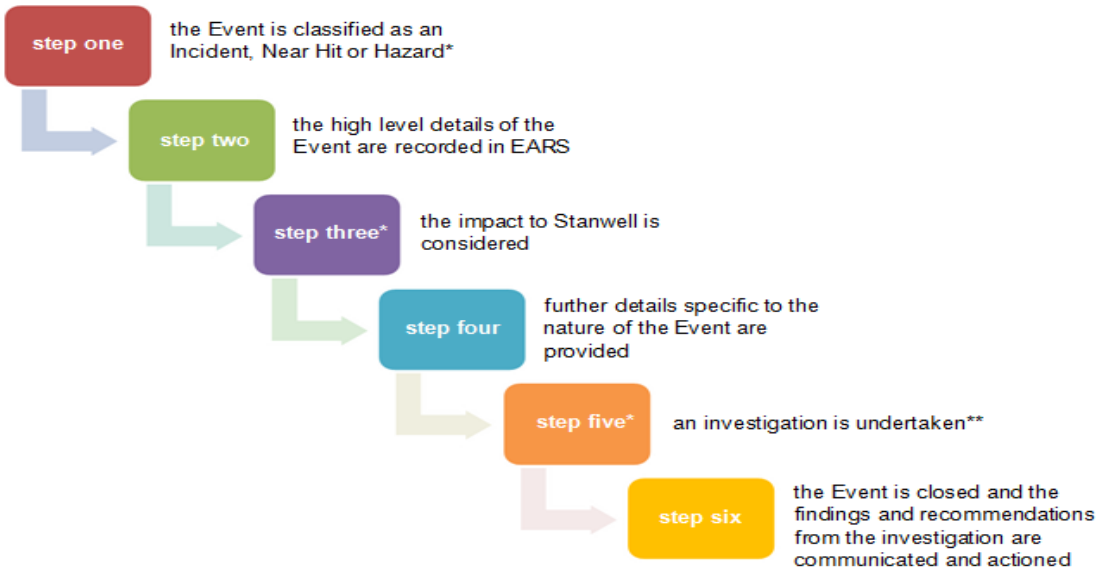
Section 5.0 of this document lists the standard checklists used to assist in determining whether an event must be notified to an external regulator.

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.

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.

2.3 Management of Events

Once notification of an event or near hit has been made, either internally or externally, the event 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.

2.3.1 Step One: Classification

The event must first be classified as:

Event Classification	Definition
Incident	An unplanned occurrence which impacts Stanwell, our people, the environment, and/or the communities in which Stanwell operates.
Near Hit	An unplanned occurrence that has the potential to impact Stanwell, our people, the environment, and/or the communities in which Stanwell operates, but does not.
Hazard	A situation that, if left uncontrolled, has the potential to impact Stanwell, our people, the environment, and/or the communities in which Stanwell operates.

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, it may be possible to classify a single event 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 determines whether the event is classified as an incident or a near hit.

See also:

- Appendix 2 for guidance on the classification of Process Safety events as incidents, near hits or hazards.
- Appendix 3 for guidance on the classification of Safe Work System events as incidents, near hits or hazards

Example

A piece of equipment falls from height, narrowly missing a person walking underneath, but sustains damage on impact.

- *It can be classified as an incident as there was an unplanned occurrence which had an actual impact i.e., equipment was damaged (financial impact); and*
- *It can also be classified as a near hit as there was an unplanned occurrence which had the potential to impact a person but did not – the person could have been injured by the falling equipment but was not (i.e., a potential health and safety impact)*

The assessment considers what the actual financial impact was as a result of the equipment being damaged and also what the potential health and safety impact could have been, considering all the controls that were in place at the time (e.g., safety barrier in place).

*If the assessment concludes that the actual financial impact is 'Low' (<$500,000) and the potential health and safety impact is 'Minor' (first aid injury), then the event is classified as a near hit (**refer to Section 2.3.3 for further details about assessments**).*

2.3.2 Step Two: Recording 'High Level' Event Details

Events are to be recorded in EARS as soon as reasonably practicable.2
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:

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

The responsible supervisor must not be the person appointed to investigate the event.

2.3.3 Step Three: Impact Assessment (Incidents and Near Hits Only)

An assessment of the event's impact must be made. This is done using Stanwell's Risk Evaluation Matrix (GOV-STD-11) using the best information available at the time. Events are escalated in accordance with Stanwell's Event Evaluation and Escalation Matrix (GOV-STD-32). Events that have a risk ranking of Major (4) or Severe (5) will require the site incident manger to be notified and will be managed under the site Incident Management process. As an event evolves its event impact rating may also need to be reviewed and updated.

Incident	Near Hit
What the actual impact of the incident is	What the impact of the near hit could reasonably have been, considering all controls in place at the time of the event.

An event may have consequences / impacts in one or more of the following areas:

- Health and safety.
- Environment.
- Financial.
- Reputation.
- Compliance.

The impact of the event influences several elements of event management including:

- Who is to be notified of the event;
- The level of reporting and investigation required; and
- The level of sign off needed.

Key classifications and notification assessments to consider when an event occurs include:

- T-3158: Serious Injury or Fatality SIF Incident Checklist
- T-2153: Safety Notifiable Incidents Checklist
- T-3541: Environmental Notifiable Event – Checklist
- T-2145: Electricity Safety – Notifiable Incidents Checklist
- Safe Work System Event Classification Guide

[2] If EARS is unavailable, or if computer access is limited, event details may be recorded on Event Notification form T-1897 ('Yellowie') and the form provided to the relevant manager or supervisor. These details must be entered into EARS as soon as practicable.

2.3.4 Step Four: Further Event Details

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

Further details on what information is required is described in the Guide to Recording an Event in EARS (19/18425).

2.3.5 Step Five: Investigation

The purpose of investigating an event is to identify what happened and what caused it to occur, i.e. the root cause and contributing factors. This information is then used to determine the appropriate corrective and preventative actions to prevent future recurrence. If further information is obtained about the impact of an event during the event investigation, the impact assessment should be updated accordingly.

Investigations of all Low to Moderate (Level 1-3) incidents or near hits should be undertaken as soon as practicable following the event by an appropriate subject matter expert and/or manager.

Impact assessment and formal investigation is not required for hazards. However, consider the appropriateness of controls currently in place and whether any corrective and/or preventative actions are required to remove the hazard or mitigate the potential impact.

Investigations should be completed within thirty (30) days of the date on which the event was reported to the manager or supervisor. 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 (EGM) as soon as possible.

When undertaking an investigation T-1948: Investigation Report, may be used. This form identifies the information that may be required, and provides many templates such as witness statements.

Before undertaking an event investigation, consider:

- Engaging Stanwell's legal team who can advise on legal professional privilege and what is required to ensure that it is maintained over the investigation can be maintained as appropriate.
- Who will conduct the investigation – whether there is there an internal investigator with sufficient expertise to undertake the investigation, or an external investigator needs to be appointed?
- All possible sources of information, including witnesses, experts, policies, control system data, photographs or film, specialist analyses, procedures and/or records.
- How information will be obtained and collated.
- The tasks and/or timeframes for the investigation required to obtain all required information.

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

The Root Cause Analysis for Asset Events business procedure (ASM-PROC-ENG-MAN-27 outlines the process and triggers for conducting and recording root cause analyses (RCAs) on asset integrity events.

2.3.5.1 Root Cause and contributing factors

An investigation of an Incident or Near Hit must consider:

- the root cause (categorised appropriately i.e. People, Plant, Process) and contributing factors of the Event; the condition(s) or act(s) that directly caused the Event to occur; or
- a specific, underlying cause which can be identified.

Stanwell uses a number of different methods to determine the root cause and contributing factors of an incident depending on the type and impact of the event. An investigator of an incident will determine the most appropriate type and level of investigation required using their sections internal processes. Some examples of root cause analysis methodologies that Stanwell use include:

- 5 Why Root Cause Analysis – A simple process to highlight actions (or inaction) and conditions leading to causes of an incident (asset integrity events).
- Cause Tree Root Cause Analysis –This is often the preferred method to identify complex plant and equipment failure root causes (asset integrity events).
- ICAM analysis – the preferred investigation method to identify root causes and contributing factors for Health, Safety and Environment events where the event severity level dictates a dedicated investigation (generally level 3 and above).

2.3.5.2 Investigation Recommendations

Once the root cause and contributing factors of an event have been identified, the investigator(s) recommends:

- What is required to correct what has occurred (corrective measures).
- What is required to prevent the event from occurring again (preventative measures); and/or
- Improvements to organisational procedures and/or processes.

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 recommendations/actions nominated within the investigation report are required to be recorded as actions in EARS, this includes actions implemented through completion of the event investigation. This proactive provides traceability and alignment with investigation recommendations and completeness of records.

In Ellipse - a Work Request (WR) will need to be created using MEEEAR – EARS Work Request (the work request classification will default to 03 – EARS). This Work Request will record the EARS Action requirements for remediation. The Work Request Id number will be prefixed with "ACT-" and the unique EARS Action Id number is to be manually entered in this field.
Any Work Order (WO) created to remedy the EARS Action will be created from the MEEEAR - Work Request. This will link the Work Orders and Work Request via the "EARS" Work Request Id. Number.

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 this (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. Note that the action of raising a Work Order in Ellipse for execution of an action is NOT considered as closed out. Only when the work order has been completed should the action be closed.

Refer to the Guide to Recording an Event in EARS (19/18425) for further guidance around Action management.

2.3.6 Step Six: Event Close Out

Events must be formally closed out. Close out of incidents and near hits should occur as soon as the investigation has been completed and associated reporting requirements met. This requires an independent person, i.e., not someone involved in the investigation, to review the investigation report and endorse its findings and recommendations.

Close out of a **hazard** can occur when the hazard is entered into EARS, provided that the appropriateness of existing controls and the need for any additional corrective and/or preventative actions to remove the hazard or mitigate its potential impact have been considered.

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

Once the event has been formally closed, the findings and recommendations from the event investigation should then be communicated as appropriate.

2.4 Monitoring and Review

The Operations Events Review (OER) meeting review event investigations.
Incident investigations subject to OER review include:

- Events that have been preceded by similar or repeat significant events within the last two years.
- Events that 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.[3]

- Events where a very high level of investigation involving an external investigator has taken place.
- Events 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 have arisen from a regulatory breach or which may result in prosecution.
- Events where the Operations Leadership Team (OLT) have requested an OER investigation into an emerging trend of occurrences; and
- Any other investigation which the OLT have unanimously agreed to review.

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

- Tailored notifications, which ensure that key stakeholders have oversight of events relevant to their divisions or teams as recorded in EARS.
- Compliance issue and breaches, which are reported in accordance with Stanwell's Compliance Breach Reporting Mechanism[4]; and
- Scheduled and/or ad hoc audits conducted on an as needs basis[5].
- Ongoing monitoring of all EARS data, including EARS data exceptions management process (e.g. compliance tasks, actions, etc.) occurs to ensure that EARS data and actions, including owners of data and actions, remain current. Currently this is monitored through EARS data and exceptions reports received by the EARS Support team, who monitor, maintain and govern EARS. In addition, relevant managers receive EARS exceptions reports (monthly) to be able to action EARS exceptions for their teams.

3.0 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 that the business implements this Procedure.
- Ensure that all events are reported and recorded in accordance with this Procedure.
- Ensure that actions are managed in accordance with this Procedure and the associated guides and Work Instructions (including that due dates for addressing actions by are met).
- Provide advice and guidance on event and action management as required.

4.0 Review, Consultation and Communication

Review:

[3] Assurance events are not restricted to health, safety, or environmental events.

[4] Refer to GOV-POL-20 Compliance and Regulatory Management Policy and GOV-PROC-28 Compliance and Regulatory Management Procedure.

[5] These may be either internal or external audits. They may focus entirely on event management or may consider event management as part of a broader audit scope.

Review of this Procedure with appropriate consultation is required every three years, and at any other time warranted by e.g., a significant organisational change.

This Procedure will be:

- Communicated to key stakeholders; and
- Made available on Stanwell's intranet.

5.0 References

- Environmental Protection Act & Regulation
- Health & Safety Act & Regulation
- GOC State Archives – Public Records Act

Document No	Document Title
19/18425	Guide to Recording an Event in EARS
18/93214	Safe Work System Event Classification Guide
GOV-POL-20	Compliance and Regulatory Management
GOV-PROC-28	Compliance and Regulatory Management Procedure
GOV-POL-30	Code of Conduct – The way we work at Stanwell
GOV-POL-37	Enterprise Risk Management and Business Resilience
GOV-PROC-36	Protected Disclosures and Complaints
GOV-PROC-37	Risk Management Framework
GOV-PROC-39	Managing Performance and Conduct Procedure
GOV-PROC-60	Crisis Leadership Plan
GOV-STD-11	Risk Evaluation Matrix
GOV-STD-32	Event Evaluation and Escalation Matrix
GOV-POL-29	Whistleblower Protection Policy
GOV-PROC-36	Protected Disclosures and Complaints
HSE-WI-01	HSE Advices and Event Communications – Drafting and Issuing
PEO-POL-21	Fair Treatment (policy)
PEO-PROC-55	Fair Treatment (procedure)
T-1948	Investigation Report
T-1897	Event Notification form ('Yellowie')
T-2153	Safety Notifiable Incidents Checklist.
T-2145	Electrical Safety – Notifiable incidents Checklist
T-2885	Petroleum and Gas Safety – Prescribed Notifiable Incidents Checklist
T-3158	Serious Injury or Fatality (SIF) Incident Checklist
T-3541	Environmental Notifiable Event - Checklist
T-3035	Process Safety Event Alert

ASM-PROC-ENG-MAN-27	Root Cause Analysis for Asset Events
T-3444	Root Cause Analysis Cause Tree Template
T-3445	Root Cause Analysis 5 WHY Template
21/141198	Recording of EARS actions in Ellipse – Ellipse Operations Bulletin #5
ASM-PROC-STG-MAN-08	Pressure Equipment Corporate Management Strategy
18/93214	Safe Work System Event Classification Guide

6.0 Definitions

Word / Abbreviation	Definition
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 across all our sites to effectively and efficiently manage and record events. EARS is accessed electronically via Stanwell's intranet.
Event	An unplanned occurrence which impacts Stanwell, our people, the environment, and/or the communities in which Stanwell operates. An event can be classified as an incident, near hit or a hazard.
Event Management	The process for managing events as described by this Procedure which includes immediate actions (if required), notification, recording, investigation, and oversight.
Hazard	A situation that, if left uncontrolled, has the potential to impact Stanwell, our people, the environment, and/or the communities in which Stanwell operates.
Incident	An unplanned occurrence which impacts Stanwell, our people, the environment, and/or the communities in which Stanwell operates.
Near Hit	An unplanned occurrence that has the potential to impact Stanwell, our people, the environment, and/or the communities in which Stanwell operates, but does not.
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.

7.0 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
2	01.06.2022	Review and inclusion of guidance on process safety / asset-related events.	M. Maraj	P. Ware	G. Smith
	27.06.2022	Minor Change – No signatures or increase of revision no. required as update was to fix the type with form No. T-1897.	Desley Wood Natasha Harding		
	05.04.2024	Document renumbered (from GOV-PROC-46) to HSE-PROC-17 due to ownership change as requested by Letitia Lucke and approved by Maria Maraj. Refer to email 24/49256. No content reviewed in the change.	Shannon Scott		
3	13.08.2024	Document reviewed to update for Process Safety Event Management and HSE event Management after transfer of document ownership. Updated to new template.	Carel Rothman	Letitia Lucke	Kriss Ussher

8.0 Appendices

- Appendix 1 – Exclusions from Scope
- Appendix 2 – Classification of Process Safety Events (including Process Safety Event Flowchart)
- Appendix 3 –Safe Work System Event Classification Guide

Appendix 1 – Exclusions from Scope

This Procedure does not apply to the following events:

- Human resources (HR) / industrial relations (IR) (including bullying, harassment and discrimination complaints, performance management issues, union issues etc.). These are managed in accordance with the applicable policies and procedures, e.g., GOV-PROC-39 Managing Performance and Conduct Procedure, PEO-POL-21 Fair Treatment (policy) and PEO-PROC-55 Fair Treatment (procedure).
- Protected disclosures and complaints, including reportable conduct. These are managed in accordance with GOV-POL-29 Whistleblower Protection Policy and GOV-PROC-36 Protected Disclosures and Complaints.
- Expressions of dissatisfaction by a key opinion leader, near neighbour or influential community stakeholder about one or more of Stanwell's sites or projects (community complaints), These are reported to the General Manager (GM) - Stakeholder Engagement and/or the Manager - Community and Indigenous Relations and managed in accordance with STM-PROC-16: Complaint Handling Procedure. Depending on the severity, it is at the discretion of the GM - Stakeholder Engagement and/or the Manager - Community and Industrial Relations whether the complaint is recorded in EARS unless the complaint involves environmental aspects or issues. Where this is the case, the complaint must be managed in accordance with this Procedure (which includes recording the complaint in EARS).6
- Legal disputes. These 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 BUMA) has the applicable obligation in accordance with the Coal Mining Safety and Health Act 1999 (Queensland). These are managed in accordance with BUMA 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 or do not require notification to the regulator. These are managed in accordance with BUMA's processes. However, where there is, or could be, an impact on Stanwell's Environmental Authority (EA), environmental obligations or require notification to the regulator, the event must be entered into EARS.
- Plant routine maintenance tasks and minor plant breakdowns or defects will be managed within Ellipse. The following cases would also require an EARS event to be raised:
    - a loss of generation, triggering safety system during shutdown process / sequence;
    - the failure mechanism is unknown, and an investigation or RCA is required;
    - notification to a regulator or external body is required; or
    - an internal procedure requires an event to be raised as a result of an action (e.g. Pressure Equipment Corporate Management Strategy ASM-PROC-STG-MAN-08).
- ICT issues that are ordinarily managed by raising a Service Desk request. These should continue to be managed in that way, e.g., where an individual is having trouble sending emails or is requires different permissions); however:

[6] It is a requirement of Stanwell's Environmental Authorities (EA) that environmental complaints are recorded. Stanwell uses EARS to record environmental complaints.

- 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 Procedure.
- Where an IT security related event occurs, it should be managed in accordance with the Security Framework and this Procedure.

- Shareholding Minister communications, including responding to unexpected requests from Shareholding Ministers. These are managed by the Stakeholder Engagement team in accordance with their business-as-usual processes.
- 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, Trading Risk Management Policy or Financial Risk Management Policy are managed in accordance with this Procedure, irrespective of impact.
- Crisis events, for example, the recent COVID-19 pandemic. A crisis must be managed in accordance with the Stanwell crisis response process (GOV-PROC-60) by the Crisis Leadership Team (CRT). It is at the discretion of the CRT if the event is subsequently recorded in EARS (and managed in accordance with this Event Management Procedure).

Appendix 2 – Classification of Process Safety Events

Process safety events tend to be high-consequence, low likelihood events which have impacts in many, if not all, of consequences areas covered by Stanwell's Corporate risk matrix, i.e., health and safety, environment, financial, compliance and reputation. However, in operating plants there tend to be more lower-level events (incidents, near hits or hazards).

A key focus of process safety is the integrity of plant and equipment especially those that contain hazardous energies or substances. Loss of containment, or potential loss of containment, of these substances or energies are defined as process safety incidents, and as such, should be entered into EARS. This includes failures of high energy, high temperature or chemical-containing plant and equipment, including pipework, and the releases of energies / substances.

In process safety, high energy refers to the following:

- Electrical energy is the most common form of energy in workplaces. It can be available live through power lines or it can also be stored, for example, in batteries or capacitors.
- Hydraulic potential energy is the energy stored within a pressurised liquid. When under pressure, the fluid can be used to move heavy objects, machinery, or equipment.
- Pneumatic potential energy is the energy stored within pressurised air. Like hydraulic energy, when under pressure, air can be used to move heavy objects and power equipment.
- Chemical energy is the energy released when a substance undergoes a chemical reaction. The energy is normally released as heat, but could be released in other forms, such as pressure. A common result of a hazardous chemical reaction is fire or explosion
- Thermal energy is energy from an explosion, flame, objects with high or low temperatures or radiation from heat sources.
- Radiation energy is energy related to ionising, low-frequency electromagnetic, optical, or radio-frequency electromagnetic radiation. Effects may include burns, changes to genetic material or reproductive systems, or functional disorders (headache, insomnia, etc.).
- Gravitational potential energy is the energy related to the mass of an object and its distance from the earth (or ground). The heavier an object is, and the further it is from the ground, the greater its gravitational potential energy.
- Mechanical energy is the energy contained in an item under tension. For instance, a spring that is compressed or coiled will have stored energy which will be released in the form of movement when the spring expands. The release of mechanical energy may result in an individual being crushed or struck by the object.

A process safety event can involve one of, a combination of or even all the above energies.

Asset-related events that warrant investigation, root cause analysis (RCA) and / or a statutory notification are also to be entered into EARS. This also includes:

- The failure of safety critical systems or equipment to function, for example, a pressure relief device (PRD) fails to pass its Trevi-testing, or a PRD fails to lift or re-seat (see also ASM-PROC-STG-MAN-08 Pressure Equipment Corporate Management Strategy).
- Challenges to a safety critical system, for example, a fire system on a turbine activates unexpectedly or inadvertently or a Safety Instrumented System (SIS) fails to function or functions inadvertently or unexpectedly.
- Loss of generation from unexpected equipment or control system failure, for example, a crack develops in high temperature high pressure pipework or a blade fails in a turbine.

These are all considered to be process safety events to be recorded in EARS.

The following flow diagram can be used to classify process safety events.

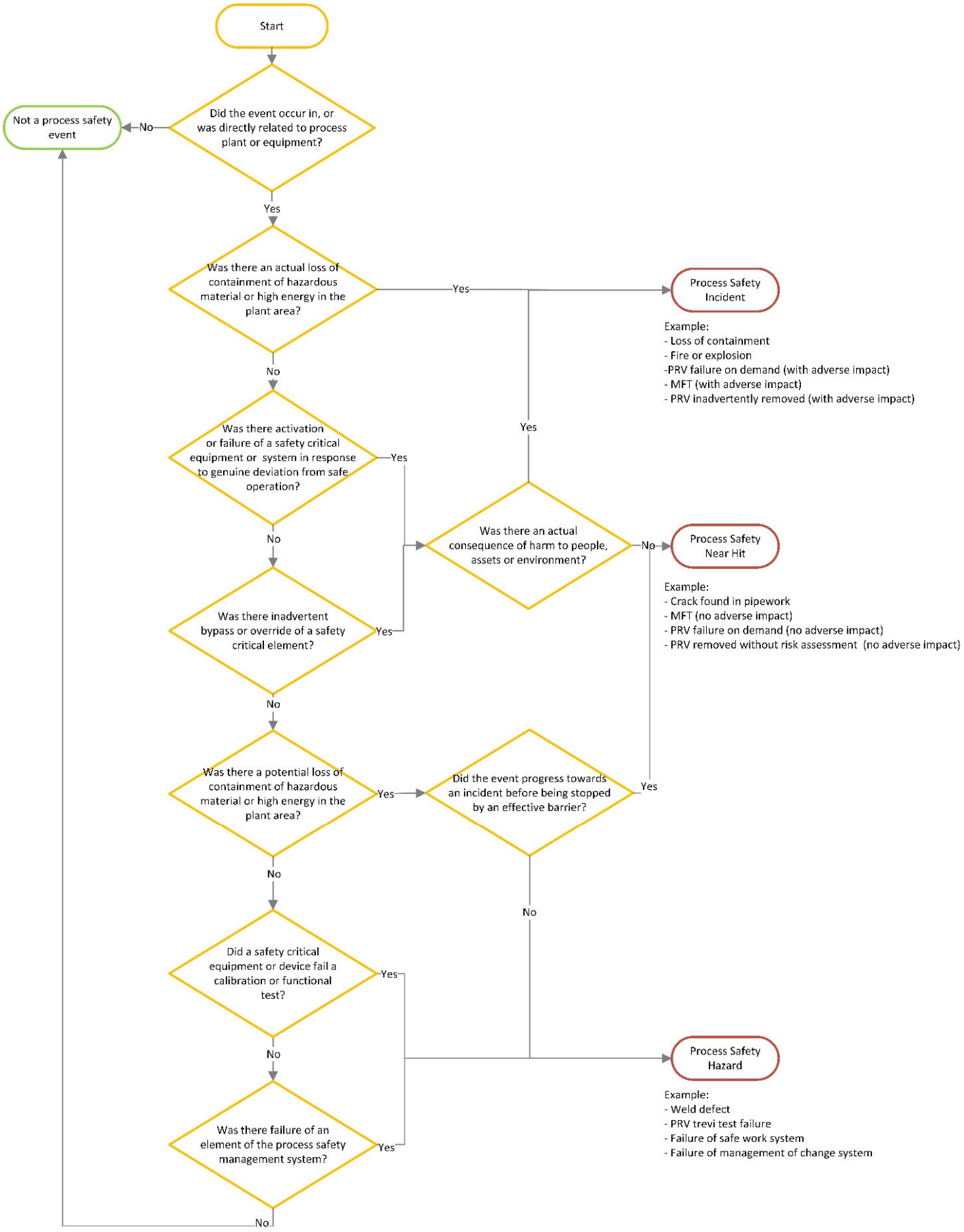


Figure 1 - Process Safety Event Flowchart

Appendix 3 – Safe Work System Event Classification Guide (CM 18/93214)

Hazard: A situation that, if left uncontrolled, has the potential to impact Stanwell and/or Our People.
Near Hit: An unplanned occurrence that has the potential to impact Stanwell and/or Our People.
Incident: An unplanned occurrence that impacts Stanwell and/or Our People.