

Safety, Health and Environment Reporting Guidelines **Guideline No.: 50.09**

1.0 INTRODUCTION

Tronox Safety, Health and Environment (SHE) Reporting Guidelines set out to communicate corporate-wide requirements for consistent reporting of injuries, incidents, and indicators. This is to provide accurate and up-to-date metrics for analysis of the global SHE performance.

This document uses the Tronox SHE Global Documents [50.07](#) (*Global Injury and Illness Classification Guidelines*), [50.08](#) (*Global LIFE Classification Guidelines*), and [50.10](#) (*Global Incident Classification Guidelines*) for information and definitions of what constitutes injuries and events¹.

The purpose of this guideline is to:

- Focus our attention on the importance of SHE reporting and communication, in our pursuit of reducing company-wide exposure to hazards, improving resource efficiency, and bringing down our environmental footprint.
- Set a consistent global standard for corporate SHE reporting, communication of incidents and incident learnings.
- Provide guidance for consistent and quality data recordings to support SMART (Specific, Measurable, Assignable, Realistic, Time-related) SHE metrics.
- Provide guidance on how to interpret and work with the information and definitions stated in the Tronox SHE Global Documents indicated in the above paragraph.

2.0 RESPONSIBILITIES

Each Tronox Safety, Health, Environment, and Quality (SHEQ) Manager is accountable for the reporting of SHE information and data, including incidents.

This document only considers requirements for corporate reporting and does not provide guidance on any regulatory reporting requirements. Sites are expected and required to follow all site-specific reporting procedures and to comply with regulatory requirements. Confidentiality requirements related to medical records must also be adhered to.

¹ For the purpose of this guideline, “event” will be written as incident and consideration should be given to the correct term in relation to the type of event or incident.

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3.0 DEFINITIONS

Contractor	Persons or organizations working onsite or offsite on behalf of an organization with a relationship determined by a contract.
Employee	An individual who is, according to national law or practices, recognized as an employee of Tronox.
Exposure hours	The total number of hours of employment including overtime and training, but excluding leave, sickness and other absences.
Incident Flash Report	A report designed to capture information about specific Occupational Safety & Health (OSH), Process Safety (PS), Environmental (ENV), or Security (SEC) incidents. The purpose of an Incident Flash Report is to notify safety leaders of the occurrence of an incident rather than to provide accurate details.
Lessons Learned Report	A report designed to facilitate the reporting of results following an incident root cause investigation. The purpose of a Lessons Learned Report is to communicate learnings to assist with the prevention of future incidents. Lessons learned reports are created in the same template as used for incident flash reports.
GPI/Sustainability Tool	In-house developed IT tool used by SHE for the collection and analysis of statistics and sustainability data.



4.0 PROCEDURES

4.1 Incident Reporting

There are a total of four different reporting processes, depending on the severity or potential severity of the incident. These procedures are categorized from A to D, starting at A with the most severe incident level, and ending with level D for the least severe incident level. Reference must be made to the Tronox Policy Documents [50.07](#) (*Global Injury and Illness Classification Guidelines*), [50.08](#) (*Global LIFE Classification Guidelines*), and [50.10](#) (*Global Incident Classification Guidelines*) to determine the Level of the incident prior to following these reporting guidelines.

<h2 style="margin: 0;">Level A</h2> <p style="margin: 0;">(Actual outcome only)</p>
<ol style="list-style-type: none"> 1. Provide appropriate level of emergency medical care of worker(s). 2. Contact Site Director, Regional Head of SHEQ and Regional MD by calling or texting their mobile phone as soon as practicable. 3. Regional SHEQ or Site SHEQ Manager to contact designated VP of SHEQ by calling or texting their mobile phone as soon as practicable and MD to escalate to COO. 4. Regulatory reporting as required by regulations governing the site. 5. First draft Incident Flash Report to the designated VP of SHEQ and to the designated SHEQ Global Analyst according to table on page 4. 6. Conduct incident investigation to determine root causes, contributing factors and LIFE precursors. 7. Communicate Lessons Learned Report including key learnings and action items to designated VP of SHEQ and to designated SHEQ Global Analyst within according to table on page 4.

<h2 style="margin: 0;">Level B and/or LIFE Incidents</h2> <p style="margin: 0;">(Actual outcome or realistic potential outcome that aligns to Level A or B) Statistical records reflect actual outcome while reporting reflects realistic potential outcome.</p>
<ol style="list-style-type: none"> 1. Regulatory reporting as required by regulations governing the site. 2. First draft Incident Flash Report/notification to the designated VP of SHEQ and to the designated SHEQ Global Analyst according to table on page 4. 3. Conduct incident investigation to determine root causes, contributing factors, LIFE precursors. 4. Communicate Lessons Learned Report including key learnings and key action items to designated VP of SHEQ and to designated SHEQ Global Analyst according to table on page 4.

<h2 style="margin: 0;">Level C</h2> <p style="margin: 0;">(Actual or realistic potential outcome) Statistical records reflect actual outcome while reporting reflects realistic potential outcome.</p>
<ol style="list-style-type: none"> 1. Regulatory reporting as required by regulations governing the site. 2. Notification via email to designated VP of SHEQ and designated SHEQ Global Analyst according to table at the bottom of this page. 3. Investigation, sharing, action items, and closure follows site level procedures.

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<h2 style="margin: 0;">Level D</h2> <p style="margin: 0;">(Actual or realistic potential outcome) Statistical records reflect actual outcome while reporting reflects realistic potential outcome.</p>	
<p>1. No flash report required, incident only has to be reported in corporate monthly statistics.</p>	<p>2. Investigation, sharing, action items, and closure follows site level procedures.</p>

An incident can trigger multiple incident classification categories. For example, a release could be a Process Safety incident Level C and a LIFE incident at the same time. In such a case the incident should be reported according to the classification that is associated with the highest reporting procedure (the above example incident would be reported according to the LIFE incident reporting requirements).

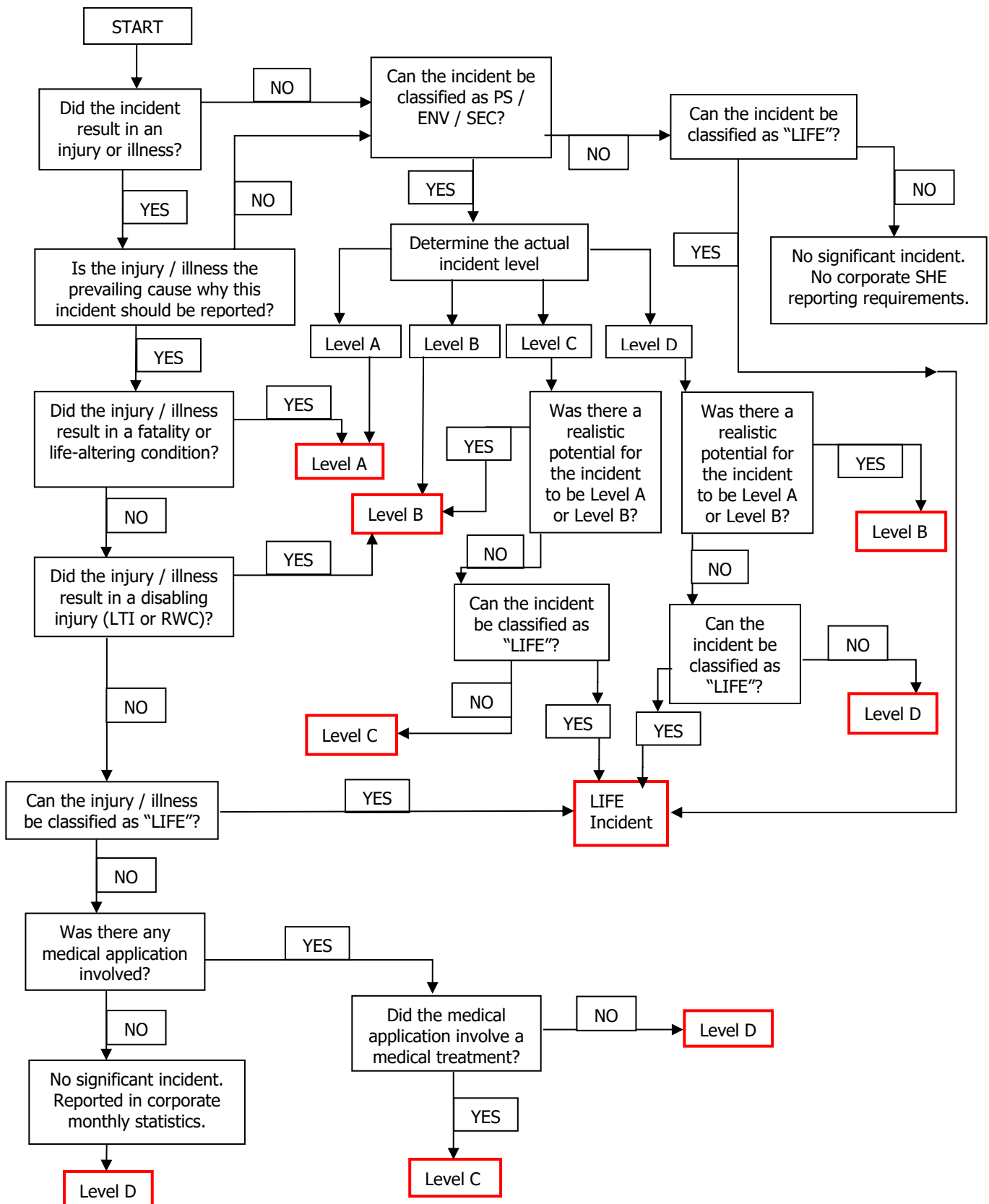
In case an incident is not required to be reported via flash report and lessons learned report, but the site/regional SHEQ Manager identifies valuable learnings from the incident investigation, he/she can decide to communicate these learnings in a lessons learned report to the designated SHEQ Global Analyst, who will share the report via the global distribution list.

The table below provides an overview for the reporting of incident flash reports (IFR), lessons learned reports (LLR). The levels refer to actual or realistic potential outcome. A “LIFE” classification (for safety incidents) and “realistic potential for Level A or B” classification (for process safety, environmental, and security incidents) will always require IFR and LLR reporting.

	Occupational Safety & Health	Process Safety	Environmental	Security
High potential	LIFE: IFR & LLR	Realistic potential for Level A or B: IFR & LLR		
Level A	IFR & LLR	IFR & LLR	IFR & LLR	IFR & LLR
Level B	Notification only*	IFR & LLR	IFR & LLR	IFR & LLR
Level C	Notification only*	None	None	None
Level D	None	None	None	None
IFRs/notifications to be reported within 48 hours and LLRs within 28 days after the incident occurred.				

*Notification is an email including the date of the incident, location, injury classification, worker type, and incident summary.

In case the guidance above is not conclusive, the decision tree below might help in determining the correct incident reporting procedure (highlighted in red).



Reclassification

Reclassification of any incident that either was or becomes a reportable incident (including LIFE incidents) needs to be communicated within 48 hours to the VP of SHEQ and the SHEQ Global Analyst. All other reclassifications (i.e. non-LIFE first aid cases/near hits) should be corrected in the monthly SHE statistics, including a comment explaining the reclassification.

4.2 Monthly SHE and Process Safety Reporting

GPI/Sustainability Tool → “Monthly SHE Report” & “Process Safety Report”

At month closure (5th business day of the new month) all Tronox locations are required to provide specific SHE data as defined in the “Monthly SHE Report” in GPI/Sustainability Tool and those locations that are included in the Process Safety program are required to provide Process Safety data as defined in the “Process Safety Report” in GPI/Sustainability Tool. All cells of the report should be completed (empty cells are processed as “zero”).

In order to get access to GPI/Sustainability Tool, please [contact](#) the designated SHEQ Global Analyst.

Exposure hours

When reporting exposure hours one should differentiate between employee and contractor exposure hours. Please refer to section 3.0 *DEFINITIONS* for definitions of exposure hours, employees, and contractors.

4.3 Quarterly GRI Environmental Performance Reporting

GPI/Sustainability Tool → Monthly Environmental Report

At quarter closure (15th calendar day of the new month after quarter closure) all Tronox locations are required to provide data on the 4 environmental parameters: energy consumption, CO₂-emissions, water consumption, and waste production. Each location creates a report in GPI/Sustainability Tool that was specifically designed to take into account the location’s environmental footprint. It is therefore expected that **all** topics in the report are completed. Also, in case the composition of topics that together make up the final footprint, changes, it is expected that the location informs the designated SHEQ Global Analyst such that the report template can be adjusted accordingly. It is up to the environmental reporter to decide whether to create three separate monthly reports or one quarterly report. Please make sure to consistently apply this decision over a complete year (no combination of monthly and quarterly environmental reports).

All reported environmental data should be based on metered values. In case a metered value is not (yet) available, please report a calculation based assumption. It is important that all topics included in a report are reported on, because missing values can have a significant effect on the environmental statistics. When reporting values that cannot be considered definitive yet, please highlight the “preliminary” radio button for that particular topic in GPI/Sustainability Tool.

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4.4 Annual Reporting

At the start of January each year the previous year-end balance for OSH, PS, and ENV statistics must be double checked against all local statistics. It is the responsibility of the site SHEQ Managers to make sure that any changes during the year are processed in time for the year-end reconciliation and there is no requirement to make further adjustments.

It should be noted that the year-end process regarding environmental statistics can be an extensive process as this check more data intensive. Accuracy is important to maintain integrity for the purpose of the GRI report and your support and diligence in a timely manner appreciated.

Data on land use (environmental reporting) is not required in monthly/quarterly reports but will need to be reported at year end. See below for specific reporting requirements.

Land use

GPI/Sustainability Tool → Annual GRI Report

Data on land use activities should only be reported at year end, as most data refers to a snap shot as at December 31. This parameter is not included in the quarterly environmental reporting template and therefore reporters are required to create an “Annual GRI Report” in GPI/Sustainability Tool.

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5.0 REPORTING DEADLINES

In the table below the communication procedures and corresponding deadlines for different situations are presented.

Situation	Communication method	Designated person	Deadline
Incident	See 4.1 Incident Reporting	See 4.1 Incident Reporting	Incident flash reports/notifications within 48 hours and lessons learned reports within 28 days after the incident occurred.
Monthly SHE and Process Safety reporting	GPI/Sustainability Tool	SHEQ Global Analyst	5 th <i>business</i> day of the new month
Quarterly GRI environmental performance reporting	GPI/Sustainability Tool	SHEQ Global Analyst	15 th <i>calendar</i> day of the new month after quarter closure
Annual safety reporting (validation)	GPI/Sustainability Tool	SHEQ Global Analyst	15 January.
Annual environmental reporting (validation)	GPI/Sustainability Tool	SHEQ Global Analyst	31 January.

6.0 COMMUNICATION OF INCIDENTS AND STATISTICS

Incident Flash Reports and Lessons Learned Reports will be communicated via a distribution list (.TRX Incident Flash Reports) that consists of safety professionals from all Tronox locations. Once distributed, these reports will be added to the Sustainability SharePoint website, where incidents are classified and stored in a database for easy reference. A link to this database can be found [here](#).

Weekly SHE reports are generated every Tuesday/Wednesday including the up-to-date LIFE/recordable incident statistics. It is therefore essential that incidents get reported in a timely manner. People on the .TRX Weekly Safety Report distribution list will receive these reports.

Monthly SHE reports are published on the 7th business day of the new month. People on the .TRX Monthly Safety Report distribution list will receive these reports.

Employees who are not on the distribution lists for the above mentioned reports but can benefit from the information that is contained in the reports should raise an IT ticket to be added to the specific distribution list.

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