

Event Management

Document Number – GOV-PROC-46

This document applies to the following site(s):

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1.0 Purpose/Scope

Stanwell's Event Management Strategy outlines Stanwell's approach to Event Management to ensure that Events are consistently, effectively and efficiently managed at Stanwell. This Event Management Procedure supports Stanwell's Event Management Strategy and details *how* Events are to be managed.

2.0 Scope

In accordance with the Event Management Strategy, this Event Management Procedure applies to all Events unless they are specifically excluded by section 12 of this Procedure. Although the vast majority of Events at Stanwell are health and safety or environmental Events (based on historical data), they are not the only events that occur in our business. It is important that all types of events are reported and recorded, even if they arise infrequently.

3.0 Overview

Efficient and effective Event Management (including the notification, management and recording of Events) is required to:

- ensure that all Events are escalated and investigated appropriately;
- enable corrective, preventative and improvement actions to be implemented that prevent harm;
- ensure compliance with obligations (including but not limited to laws, regulations, policies, Standards and Codes);
- ensure Stanwell's 'right to operate';
- analyse, trend and learn, 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.

This Event Management Procedure outlines how to efficiently and effectively manage Events at Stanwell.

4.0 Stages of Event Management

4.1 Immediate Actions

Once an Event is identified¹, 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.

Examples of the actions that may be taken include:

- ensuring appropriate medical treatment is provided to people who have been injured;
- making the scene safe to other people (for example, cordoning off the scene);
- cutting power supply to the affected area;

¹ An Event may subsequently be identified through an audit or other review.

- containing spills or overflows;
- preserving the scene for investigation purposes if applicable;
- implementing alternative and/or manual processes;
- organising the immediate submission of required regulatory documents; and/or
- requesting assistance from a subject matter expert, including but not limited to:
 - Environment Manager / Advisor(s);
 - Financial Controller;
 - General Manager – Corporate Services;
 - General Manager Financial Services;
 - Health and Safety Manager / Advisor(s);
 - Manager Energy Trading;
 - Senior Compliance and Regulatory Advisor;
 - Site Manager(s); and/or
 - Retail Trading Manager.

4.2 Notification

All of Our People are required to report identified Events as soon as reasonably possible. This is especially relevant where an Event requires notification to a Regulator (refer to section 4.4.2 of this Procedure) and there are strict statutory timeframes associated with that notification (for example, Stanwell must notify the Work Health and Safety Regulator as soon as possible after becoming aware that a ‘notifiable incident’ has occurred).²

4.2.1 Internal Notification

Internal to Stanwell, the initial Event notification should be provided verbally to your manager or supervisor and include details of what has occurred and how it has been managed to date. It is not sufficient to simply send your manager or supervisor an email or just enter it into EARS. In addition, any Events that are also compliance breaches must be reported in accordance with Stanwell’s Compliance Breach Reporting Mechanism (as outlined within the Compliance and Regulatory Management Policy (GOV-POL-20)).

Some areas of Stanwell’s business operate 24 hours a day. Some Events may need to be notified by telephone to a Site Manager or the Manager Energy Trading outside of standard business hours. This will be dependent upon the nature and/or impact of the particular Event.

4.2.2 Notifications to External Regulators

For the avoidance of doubt, any event that is required to be, or has the potential to be, notified to an external regulator, is to be managed in accordance with this Event Management Procedure. Regulators that Stanwell may be required to notify (in the ordinary course of its business activities) include³:

² Subject matter experts are responsible for ensuring notification is provided to the relevant Regulator. This includes the Health and Safety Manager and/or Health and Safety Advisors (for health and safety notifications), the Environment Manager and/or Environment Advisors (for environmental notifications), the Manager Regulatory Strategy and/or the Energy Trader – Regulation (for notifications to the AER), the Chief Operating Officer, Site Managers, Manager Asset Planning and/or other nominated persons within the Operations’ division (for notifications in relation to generator performance standards), the Senior Legal Counsel – Trading (for notifications in relation to Stanwell’s Australian Financial Services Licence), the Senior Compliance and Regulatory Advisor, the General Manager Corporate Services and Stanwell’s internal legal team.

³ This is not an exhaustive list of the notifications required to be made to Regulators.

Regulator	Examples of notifications which may be required:
Australian Energy Market Operator (AEMO)	<ul style="list-style-type: none"> if there is a non-conformance with Generator Performance Standards if there are changes which mean that Stanwell is unable to comply with the latest dispatch offer made to AEMO if there is an event that has affected, or is likely to affect, Stanwell's generation unit availability
Australian Energy Regulator (AER)	<ul style="list-style-type: none"> if a non-compliant offer, bid or rebid has been made but has not been corrected within the time allowed under the National Electricity Rules
Australian Securities and Investment Commission (ASIC)	<ul style="list-style-type: none"> if there is a breach of, or non-conformance with, Stanwell's financial services licence (AFSL)
Department of Energy and Water Supply (DEWS)	<ul style="list-style-type: none"> in relation to Stanwell's generation authorities, retail authority and/or special approvals in relation to Stanwell's referable dams
Department of Environment and Heritage Protection (DEHP)	<ul style="list-style-type: none"> if there has been serious or material environmental harm, or if serious or environmental harm is threatened, which may include: any release off-site which may or may not cause environmental harm that is not expressly permitted under a site licence; non-compliance with the conditions of a site licence, permit, approval or other external body specified in the licence; or exceedance of a reporting trigger value.
Department of Natural Resources and Mines (DNRM)	<ul style="list-style-type: none"> in relation to a Mining tenement non-compliance in relation to Stanwell's petroleum pipeline licence (PPL) reporting requirements
Electrical Safety Office (ESO)	<ul style="list-style-type: none"> if there is a 'serious electrical incident' if there is a 'dangerous electrical event'
Work Health and Safety Queensland (WHSQ)	<ul style="list-style-type: none"> if there is a 'notifiable incident', which includes: <ul style="list-style-type: none"> the death of a person; a serious injury or illness of a person; or a 'dangerous incident'

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.

Further details of the various types of Events that may require these notifications are contained in the Appendices to this Event Management Procedure (refer to section 13 of this Procedure).

4.3 Recording an Event in Stanwell's Event, Audit, Risk and Compliance System (EARS)

After Events are notified in accordance with section 4.2 of this Procedure, all Incidents, Near Hits and Hazards are to be recorded in EARS as soon as reasonably possible.

EARS is Stanwell's integrated whole of business Events, Audit, Risk and Compliance System (EARS). EARS provides for the consolidated management and recording of Events (as well as risks, audits and compliance obligations, tasks and issues (including breaches)) and ensures that timely notification is provided to the people required to manage the Event.

Where EARS is unavailable, Event details may be recorded on an Event Notification form (form number T-1897) also known as a 'Yellowie', a copy provided to the relevant manager or supervisor and then entered into EARS as soon as EARS is available.

4.3.1 Initial Event Details

Recording an Event in EARS initially requires you to provide a description of what happened, when it happened and where it happened (the Event Details). An assessment of whether the Event is an Incident, Near Hit or Hazard must be made⁴, and the Event must also be categorised as one or more of the following:

- Environmental;
- Environmental Complaints;
- Finance;
- Health and Safety;
- Information Technology;
- Land, Property and Tenements;
- Other;
- Asset Management or Production (i.e. Plant/Equipment and/or Generation);
- Process Safety; and/or
- Trading.

For example, if there is an explosion in a boiler room and someone is injured, this Event could be categorised as a Health and Safety Incident (on the basis that there was an actual injury to a person) (note also that it would require notification to Workplace Health and Safety Queensland (refer to section 12.5.3.)), a Plant/Equipment Event (on the basis that there was an actual impact to plant and equipment) *and* a Process Safety Event (on the basis that there was an explosion).

4.3.2 Automated Notification

Once the Event Details are recorded in EARS, an automated email notification is provided to the people required to manage the Event (that is, the person nominated to manage the Event, the Health and Safety team, the Environment team and/or the Compliance and Regulatory team).

As soon as an Incident or Near Hit is recorded and saved in EARS, simultaneous notification is also provided to Stanwell's Executive Leadership Team.

4.3.3 Impact Assessment

Once the Event Details are recorded and saved, an assessment of the impact of the Event to Stanwell must be made.⁵

⁴ Sometimes a single Event may be able to be classified as both an Incident and a Near Hit. For example, if a piece of equipment were to fall off a walkway, narrowly miss a person walking underneath, but sustain damage on impact it could be considered to be an Incident (on the basis that there has been an actual impact Stanwell and/or Our People, as equipment has been damaged) but it could also be considered to be a Near Hit (on the basis that there could have been an impact to Stanwell and/or Our People, as a person could have been injured). Where this occurs, an impact assessment should be made on both the actual impact and on what the impact could have been (taking into consideration all of the controls that were in place at the time), and the higher impact should dictate whether the Event is classified as an Incident or a Near Hit. For example, if the assessments concluded that the actual damage was only \$5,000 (Finance, Low (Level 1) but it could have resulted in a first aid injury to the person (Health and Safety, Minor Level 2), the Event should be categorised as a Near Hit (as it has the higher impact).

⁵ An impact assessment is required for incidents and near hits only.

An impact assessment considers whether the Event had (or has):

- a health and safety impact;
- an environment impact;
- a financial impact;
- a reputational impact; and/or
- a compliance impact.

Event impact assessments are based on Stanwell's Risk Evaluation Matrix (GOV-STD-11), and should be made using the information available at the time.

Where the Event is an Incident, the *actual* impact of the Event should be considered. Where the Event is a Near Hit, the assessment should be made on what the impact *could* reasonably have been, taking into consideration all of the controls that were in place at the time of the Event (possible impact). An impact assessment is not required if the Event is a Hazard.

It is important to record the impact of the Event as it will dictate the level of reporting and investigation that is subsequently required.

The impact of an Event may also be updated as more information is learned during or upon completion of the Event investigation.

4.3.4 Further Event Details

As information is recorded and saved, EARS will automatically select the relevant fields that will require completion. All compulsory fields must be completed, and everyone is encouraged to complete all non-compulsory fields in as much detail as possible (where relevant).

Further details about what information is required is outlined in the Recording an Event in EARS Work Instruction (GOV-WI-31).

5.0 Investigation

An Event investigation is undertaken to identify what happened and what caused the Event to occur.⁶ This can assist in determining what actions can be undertaken to help prevent a similar Event from occurring again in the future.

Investigations for all Events should be undertaken as soon as possible following the Event. Where the investigation relates to a health and safety Incident or Near Hit, the investigation must be completed within 30 days of the date on which the Event was reported to the manager or supervisor (not the date that it was recorded in EARS).⁷

The level of investigation required will depend firstly on whether an Event is classified as an Incident, Near Hit or Hazard, and secondly on the impact assessment that has been made (Low, Minor, Moderate, Major or Severe). A more extensive investigation will be required for an Incident or a Near Hit, compared to a Hazard.

Depending on the nature of the Event, consideration may also be given as to whether Stanwell's internal legal team should be engaged before the investigation is undertaken. Stanwell's internal 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 required).

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

⁶ Investigations are not undertaken to place blame on a person or a team for what has occurred.

⁷ 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 EGM as soon as possible.

5.1 Investigation of an Incident or a Near Hit

All Incidents and Near Hits must be investigated thoroughly and an appropriate amount of time should be spent on planning these investigations. Consideration should be given to:

1. who will conduct the investigation⁸;
2. the possible sources of information (including witnesses, experts, policies, procedures and/or records) and how this information is to be obtained and collated;
3. the tasks and/or timeframes for that investigation that should be set for obtaining that information.

5.1.1 Cause

An investigation of an Incident or Near Hit must consider:

- the cause or causes of the Event; the condition(s) or act(s) that directly caused the Event to occur (for example, water on the stairs that a person slipped on); or
- a specific, underlying cause which can be identified (for example, a person not wearing appropriate safety footwear which caused them to slip).

Causes can generally be grouped into the following three categories:



Events generally occur when one or more of these categories (or components) fail.

The *environment* component considers the physical elements. Environmental causes can include plant or equipment failures, tools, engineering and/or housekeeping, for example:

- adverse working environment/conditions (noise, lighting, heat, congestion, wet etc.);
- housekeeping, displays, alarms or signage are less than adequate;
- controls are less than adequate or do not exist;
- equipment failure; and/or
- defective equipment/parts.

The *practices or procedures* component considers the things that are in place to guide behaviour. Practices or Procedures causes can include policies and procedures, our Safeguards, the effectiveness of Toolbox Talks and/or other team meetings, education, training and/or coaching. Practices or Procedures causes can include management systems/procedure and/or training, for example:

⁸ Investigations may be conducted internally or by an external party.

- corrective or improvement actions are not suitable or not yet implemented;
- emergency systems/processes failing, are less than adequate or do not exist;
- preventative/scheduled maintenance is less than adequate or do not exist;
- standards, policies, procedures or work instructions are incorrect, incorrectly followed or do not exist;
- standards, policies, procedures or work instructions are incorrect, incorrectly followed or disregarded or do not exist;
- training not conducted or less than adequate; and/or
- inspections/audits not conducted or less than adequate.

The *people* component considers behavioural choices, skills, experiences, attitudes, motivation, and teamwork. People causes can include human error, fitness for duty, communication, training/competence and/or work direction, for example:

- hazard not identified or controlled;
- incorrect operation of tools/equipment;
- PPE not working or used incorrectly;
- workers not fit for duty;
- pre-existing injury, illness or condition;
- supervision of work/worker inadequate;
- inadequate communication or communication misunderstood;
- workers not competent to perform the task; and/or
- policies, procedures and/or work instructions not followed or misunderstood.

5.1.2 Investigation Recommendations

Once the cause or causes of an Event have been identified, investigators are expected to make recommendations to:

- identify what is required to correct what has occurred (for example, what can be done to fix a piece of equipment that has failed) (corrective measures);
- identify what is required to prevent the Event from occurring again (for example, what can be done to ensure that another report to a Regulator is not submitted after the due date for submission) (preventative measures); and/or
- to suggest improvements to 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 material actions must be recorded.

As outlined in the Risk Management Framework (GOV-PROC-37), a control is a measure which modifies risk. Controls can be current or proposed and be either preventative, detective, mitigative or corrective in how they modify risk. An action is a risk treatment which implements, improves or maintains a control. Actions should either strengthen an existing control or develop and implement a new (proposed) control.

5.2 Investigation of a Hazard

Hazards do not require a formal investigation. Instead, consideration should be given to the appropriateness of the current controls in place that are relevant to the hazard (if any) or whether corrective or preventative measures are required to remove the hazard or mitigate its potential impact.

5.3 Finalisation of the Investigation

Once an investigation has been completed (and associated reporting requirements met), the Event must be formally closed out. This requires an independent person (that is, someone who did not complete the investigation) to review the investigation report and endorse its findings and recommendations. Actions must be recorded and can continue to proceed even after an Event is formally closed out.⁹

The findings and recommendations of the investigation should then be communicated as appropriate. This may include:

- discussing the findings, recommendations and learnings with the people directly involved in the Event;
- discussing the findings, recommendations and learnings at a Toolbox talk, Safety Committee meeting, team meeting and/or monthly leadership briefing;
- distributing a notification of the Event to the broader business (where appropriate); and
- providing updates on GenNet and/or in GenNews (where appropriate).

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

In addition, where a contractor breaches Stanwell's Code of Conduct or Safeguards (for example, by returning a positive alcohol or other drugs test), the breach must be reported to Procurement in accordance with the HSE Breach Process.

6.0 Event Management and Oversight

Stanwell's values – Safe, Responsible and Commercial – influence how we operate our business, and include proactively reporting and learning from Events. To ensure that we are able to learn from all Events, Stanwell undertakes regular reporting and oversight of activities including:

- compliance issue and breach reporting in accordance with the Stanwell's Compliance Breach Reporting Mechanism (as outlined within the Compliance and Regulatory Management Policy (GOV-POL-20) and the Compliance and Regulatory Management Procedure (GOV-PROC-28);
- independent fortnightly Event assurance reviews conducted by the Compliance and Regulatory team, with feedback provided to the Manager – Health and Safety and the Manager – Environment for consideration;
- independent and contemporaneous reviews by the Senior Compliance and Regulatory Advisor and the General Manager – Corporate Services of Events as they are recorded in EARS to identify anomalies or concerns which require assistance or urgent oversight;
- scheduled and/or ad hoc audits being conducted¹⁰;

⁹ Refer to Recording an Event in the Event in EARS (GOV-WI-31) for further details on action management.

¹⁰ 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.

- various reports such as the Event, Audit, Risk and Compliance Exceptions Report, the Operations Weekly Report, and various health and safety and environment reports (for example, the monthly Corporate Health and Safety Report, the monthly Corporate Environment Report and various reports prepared for the Corporate Office Safety Committee or Executive Safety Committee); and
- trending and analysis, including the Compliance and Regulatory team undertaking a monthly review of data over a 12-month rolling period to identify common or systematic issues.¹¹

7.0 Responsibilities

Event Management Procedure Hierarchy and Responsibilities



8.0 Review, Consultation and Communication

Review:

This Document is required to be reviewed, as a minimum, every 2 years in conjunction with the review of the Event Strategy. The Senior Compliance and Regulatory Advisor in conjunction with the General Manager – Corporate Services is responsible for the review and updating of this procedure.

Consultation:

Key stakeholders have been consulted in the preparation of this procedure. These stakeholders include:

- Acting Executive General Manager – Business Services;
- Acting Executive General Manager – Energy Trading & Commercial Strategy;
- Acting Executive General Manager – Production;
- Acting Executive General Manager – Safety and Asset Services;

¹¹ Following the implementation of the Business Intelligence (BI) Module of EARS (scheduled to occur in 2015), additional reporting may also be available.

- Business Continuity and Security Advisor;
- Environment Manager;
- Financial Controller;
- General Manager Financial Services;
- Group Manager Internal Audit;
- Health and Safety Manager;
- Manager Asset Planning;
- Manager Energy Trading;
- Manager Regulatory Strategy;
- Manager Supply Chain;
- Retail Trading Manager;
- Risk Management Specialist; and
- Site Managers.

Communication/Requirements after Update:

This procedure will be communicated to key stakeholders using education and training as detailed above and via GenNet.

9.0 References

GOV-STR-02	Event Management Strategy
GOV-WI-31	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
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

10.0 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.

11.0 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

12.0 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).
- Critical observations, 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).¹²
- 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.
- Plant or operations related issues (including equipment issues) that have a 'Tolerable' impact to our business which are ordinarily managed by a site's Operations Maintenance System should continue to be managed in that way; where a plant, operations or equipment Event occurs that results in expenditure, or has an impact to our business, that is 'Moderate' or above (i.e. \$5,000,000 or more), or also has health and safety, environment, reputational and/or compliance impacts, it should be managed in accordance with this Event Management Procedure (refer to section 13.3 for further details).
- 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.

¹² 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).

13.0 Appendix 2 – Event Categorisation

When the initial Event details are recorded (refer to section 4.3.1 of this Procedure), each Event must be categorised as being one or more of the following.

13.1 Environmental Events and/or Environmental Complaints

13.1.1 What is an Environmental Event?

An Environmental Event occurs when there is an actual or potential impact to the environment. Whilst the following list is not exhaustive, it provides examples of what may be identified as an Environmental Event:

- a contained spill, emission or disturbance;
- unauthorised air or noise emission which results in nuisance and/or causes environmental harm;
- unauthorised contamination;
- unauthorised harm, including death of native fauna;
- unauthorised removal of, or disturbance of, native flora / flora species;
- disposal of regulated waste that is not in accordance with policies and procedures (including the completion of relevant waste transport certificates);
- a release which may or may not cause environmental harm that is not expressly permitted under a site licence;
- a non-compliance with the conditions of a site environmental licence, permit or approval; and
- an exceedance of a reporting trigger value, for example under a receiving environmental monitoring program.

Environmental Harm is any adverse effect or actual harm, not of a trivial nature to the Environment. For further details refer to the Environmental Protection Act 1994 (Qld).

An Environment Event may also be a Process Safety Event (refer to section 13.9 of this Procedure).

13.1.1.1 Management of Environmental Compliance Event

An Environmental Event should be identified as a compliance issue when, prior to investigation, there is a concern that the issue may have a real impact on one or more of Stanwell's compliance obligations.

An Environmental Event is to be identified as a compliance breach when, following investigation, it is determined that there has been a failure by Stanwell and/or Our People to meet their identified compliance obligations.

Compliance impact assessments are conducted in line with the risk evaluation matrix and environmental guidance below. Supporting compliance description environmental guidance has been developed based on the Guideline Environmentally Relevant Activities Compliance and Enforcement <http://www.ehp.qld.gov.au/management/compliance/pdf/era-compliance-enforcement.pdf>

Impact	Compliance Description – Environmental Guidance
Moderate (Level 3)	Where there is a breach of a compliance obligation that results in an enforcement order. ¹³
Minor (Level 2)	Where there is a breach of a compliance obligation that requires regulator notification regardless of receipt of notice. ¹⁴
Low (Level 1)	Where there is a beach of a compliance obligation that does not require regulator notification.

Where a compliance breach has occurred, it must be reported and recorded in accordance with the Compliance and Regulatory Management Procedure (GOV-PROC-28) (and the Compliance Breach Reporting Mechanism).

13.1.2 What are the specific internal notification requirements for an Environmental Event?

The impact of an Environmental Event dictates to whom the Event must be notified:

Impact	Notification Requirements	
Severe (Level 5)	Immediately	The relevant supervisor or manager, site Environment Advisor, Site Manager, relevant General Manager, the GM Health, Safety, Environment and Services, the CEO, the Acting EGM Safety and Asset Services and the Acting EGM Production must be notified of the Event immediately.
Major (Level 4)	Immediately	The relevant supervisor or manager, the relevant site Environment advisor and the relevant Site Manager must be notified of the Event immediately.
	As soon as practical	The relevant General Manager, the GM Health, Safety, Environment and Services, the CEO, the Acting EGM Safety and Asset Services and the Acting EGM Production must be notified of the Event as soon as practical.
Moderate (Level 3)	Immediately	The relevant supervisor or manager and the relevant site Environment advisor must be notified of the Event immediately.

¹³ An enforcement order also includes a restraint order. Note that enforcement actions as defined within the Generation Authority Annual Return include the issue of an infringement notice, an environmental protection order, a program notice, a notice requiring the submission of a draft environmental management program or the institution of any court proceeding. Environmental impact assessment is excluded from this definition.

¹⁴ A notice may include an Environmental Protection Order, a Direction Notice, a Clean Up Notice, a Cost Recovery Notice, an Emergency Direction, a Notice Requiring Relevant Information, a Warning – Letter or Verbal, a Penalty Infringement Notice.

Impact	Notification Requirements	
	As soon as practical	The relevant Site Manager, relevant General Manager (if appropriate) and the GM Health, Safety, Environment and Services must be notified of the Event as soon as practical.
	Within 24 hours	The CEO, Acting EGM Safety and Asset Services and Acting EGM Production must be notified within 24 hours of the Event.
Minor (Level 2)	As soon as practical	The relevant supervisor or manager must be notified of the Event as soon as practicable.
	Within shift	The relevant Site Manager and the site Environment advisor must be notified of the Event within the shift.
Low (Level 1)	As soon as practical	The relevant supervisor or manager must be notified of the Event as soon as practicable.
	Within 24 hours	The relevant site Environment advisor must also be notified within 24 hours of the Event.

Where the Environmental Event does not involve one or more compliance issues or breaches, notification to the Compliance and Regulatory Team can be made via EARS.

Internal notification is via the Site Manager to the Acting EGM Safety and Asset Services. It is the responsibility of the relevant manager once notified to notify their manager / executive.

13.1.3 What are the specific external notification requirements for an Environmental Event?

In accordance with the requirements of the *Environmental Protection Act 1994* (Qld), Stanwell must notify the Department of Environment and Heritage Protection (DEHP) within 24 hours of becoming aware of a notifiable event.¹⁵ Further details of this requirement are available in DEHP's [Duty to Notify of Environmental Harm Guideline \(EM467\)](#).

The Manager Environment (Corporate) will determine the requirements for regulatory notification and must be consulted in the preparation of any notification.

Where the duty to notify is triggered from the *Environmental Protection Act 1994* (Qld), DEHP's [Duty to Notify of Environmental Harm \(EM468\)](#) form can be used to notify DEHP.

¹⁵ These notification requirements are current as at 18.05.2014 (the date this Procedure received approval).

13.1.4 What level of investigation is required for Environmental Events?

Once the relevant notifications have been made, the relevant Environment advisor and/or the Manager Environment (Corporate), in consultation with site management, can direct the need for a detailed investigation as required. However, a comprehensive investigation will generally be required for all Environment Incidents and Near Hits that are assessed as having an impact of Moderate, Major or Severe. In addition, a more comprehensive investigation may also be required for Environmental Events that are notifiable to a Regulator, result in the issuing of a Penalty Improvement Notice (PIN) or a regulatory enforcement notice, or where there was significant potential for environmental harm and it has been determined that a detailed investigation will lead to valuable lessons which will prevent reoccurrence.

The relevant site report template should be used to guide what is required in the investigation. The choice of investigation tools is at the discretion of the Site Manager in consultation with subject matter experts (e.g. the relevant Environment advisor and/or the Manager Environment (Corporate)).

13.1.5 What is an Environmental Complaint?

An Environmental Complaint occurs when there is a critical observation, expression of dissatisfaction or concern about the environmental aspects of Stanwell's operations, actions and/or performance from a person (anonymous or otherwise) or organisation external to Stanwell requesting or requiring a response or remedial action, or otherwise requiring a response.

Environmental complaints are to be reported and recorded in EARS accordance with this Event Management Procedure and are to be managed in accordance with Stanwell's Complaint Handling Procedure (STM-PROC-16).

13.2 Financial and/or Trading Events

13.2.1 What is a Financial and/or Trading Event?

A Financial and/or Trading Event may occur when there is an actual or potential impact to one or more of the business activities listed below. The following list is not exhaustive; it is intended to provide guidance around what business activities may give rise to a Financial and/or Trading Event.

- financial risk and settlements (the risk management and settlement activities performed in relation to Stanwell's participation in financial and commodity markets);
- tax (the risk management and compliance activities associated with events and transactions undertaken by the wider business and in the pursuit of commercial objectives);
- treasury (liquidity/funding management and the activities associated with the mitigation of operational, financial and/or reputational risks);
- accounts payable (activities associated with the processing and payment of vendor invoices);
- accounts receivable (activities associated with the issuing of invoices to external customers and the corresponding receipt of payment);
- payroll (activities associated with the payment of salaries and wages to employees including expense reimbursements); and
- trading (trading activities and obligations performed in relation to our participation in financial and commodity markets).

It is possible for an Event to be purely a Financial Event, purely a Trading Event or both a Financial and a Trading Event. This will depend on the specific facts and circumstances of the Event.

Specific examples of Financial/Trading Events may include the following:

- failure to notify AEMO of significant changes to ST PASA or MT PASA availability data;
- issues which restrict or prevent Stanwell's spot traders from making bids or rebids to AEMO or require Stanwell to make a non-routine notification to AEMO¹⁶;
- issues which prevent Stanwell from being to dispatch in accordance with AEMO's instructions¹⁷;
- issues which impact on Stanwell's ability to pay its staff, counterparties, suppliers or external advisors;
- incorrect payments being made, including duplicate payments, payments not being made on time (including not being made at all), being made to the wrong external party or being made for the wrong amount;
- issues in relation to relevant regulatory issues, including:
 - the receipt of notifications from the Australian Energy Regulator (AER), including warning letters or infringement notices issued in accordance with the AER's Compliance Bulletin No. 3 *Monitoring and enforcing compliance of electricity offer, bid and rebid information in the National Electricity Market* ;
 - the receipt of notifications from the Australian Securities and Investments Commission (ASIC), in relation to Stanwell's AFSL or the lodgement of associated reports; or
 - non-compliances with Stanwell's generation authorities, retail authorities and/or special approvals;
- breaches of Stanwell's Trading Risk Management Policy (MNT-POL-01) and/or Stanwell's Financial Risk Management Policy¹⁸; and
- breaches of Stanwell's Australian Financial Services Licence¹⁹.

13.2.2 What are the specific notification requirements for a Financial and/or Trading Event?

Where a Financial and/or Trading Event involves an actual or suspected breach of Stanwell's Australian Financial Services Licence, the *Corporations Act 2001* (Cth), the *Competition and Consumer Act 2010* (Cth), the Financial Risk Management Policy or the Trading Risk Management Policy, it must be reported and managed (including the making of any required external notifications) in accordance with Stanwell's Compliance Breach Reporting Mechanism and Stanwell's Financial Services Licences Compliance Program (MNT-MAN-02), the Financial Risk Management Policy or the Trading Risk Management Policy.

Where a Financial and/or Trading Event is assessed as having an impact of Moderate (Level 3) or above, it must (in alignment with the Compliance Breach Reporting Mechanism and the Crisis Event Escalation and Evaluation Matrix) be immediately reported to the relevant Executive General Manager(s) and the Chief Executive Officer, regardless of whether or not the Event occurs during business hours.

¹⁶ These Events may also be classified as Generation, Plant/Equipment and/or Information Technology Events depending on the specific circumstances.

¹⁷ These Events may also be classified as Generation and/or Plant/Equipment Events depending on the specific circumstances.

¹⁸ For any clarification on whether an Event is, or may be, a breach of the Trading Risk Management Policy and/or the Financial Risk Management Policy, please contact the General Manager Financial Services.

¹⁹ For any clarification on whether an Event is, or may be, a breach of Stanwell's Australian Financial Services (AFS) Licence, please contact the AFS Compliance Officer (currently the Senior Legal Counsel – Trading).

13.2.3 What are the specific recording and management requirements for a Financial and/or Trading Event?

Where a Financial and/or Trading Event involves an actual or suspected breach of Stanwell's Australian Financial Services Licence, the *Corporations Act 2001* (Cth), the *Competition and Consumer Act 2010* (Cth), the Financial Risk Management Policy or the Trading Risk Management Policy, it must be recorded as a compliance breach (actual breach) or a compliance issue (suspected breach that is determined to not ultimately be a breach).

If a Financial/Trading Event is declared to be an Incident or a Crisis, it must be managed in accordance with the applicable Incident Response or Crisis Response process, and it is at the discretion of the Incident Manager or Crisis Leader for the particular incident or crisis as to whether it is subsequently recorded in EARS (and managed in accordance with this Event Management Procedure). However, where an Incident or Crisis involves any breaches of obligations, they must be recorded in EARS after the Incident Management or Crisis Leadership Team has been deactivated.

13.3 Asset Management or Production Events (Plant/Equipment or Generation Events)

13.3.1 Production plant events

All production plant events (including equipment issues) are to be recorded in the relevant Operations Maintenance Management System to facilitate planning, scheduling and to capture historical data and costs.

Production plant events do not need to be managed in accordance with this Procedure unless there are associated health and safety, environmental, reputational, compliance and/or Moderate financial issues (see section 13.3.2 below for further details).

However, consideration should be given at all times as to whether the production plant event (or any operational issue) requires notification to the Insurance Specialist. Refer to the [Insurance GenNet page](#) for further information about Stanwell's duty of disclosure and the types of things that we need to notify our insurers are about. For example, even low value property damage could lead to a substantial loss of revenue (resulting in a Business Interruption insurance claim).

13.3.2 What is a Plant/Equipment Event?

Where a production plant event also has (or could have):

- an impact to health and safety, including electrical safety;
- an impact to the environment;
- an impact to our reputation;
- an impact to compliance with our obligations (for example, events involving registered plant and equipment, which includes mobile plant and vehicles²⁰); and/or
- a financial impact (in relation to the physical loss or damage) in excess of \$5,000,000 (i.e. a 'Moderate' financial impact²¹),

then it should be managed in accordance with this Procedure and identified as an Environmental, Health and Safety, Plant/Equipment and/or Process Safety Event (as appropriate).

²⁰ Stanwell's vehicles include cars, utes, trailers, mini-vans, trucks, movable cranes and forklifts.

²¹ As at May 2015, this aligns to the current coal-fired power stations property damage deductibles (under the Combined Industrial & Engineering Special Risks Insurance Policy).

13.3.3 Dangerous Events involving plant or equipment

Sometimes Events involving our plant or equipment may be classified as a Dangerous Event under the *Work Health and Safety Act 2011* (Qld) or the *Electrical Safety Act 2002* (Qld). These Events must be communicated immediately to a supervisor and to the Health and Safety Team to ensure that the appropriate external notifications can be made (refer to the notifiable incident checklists contained in section 13.4.3 of this Procedure).

These Events should be identified as Health and Safety and/or Process Safety Events (refer to sections 13.4 and 13.8 of this Procedure).

13.3.4 What is a Generation Event?

A Generation Event is a specific type of Plant/Equipment Event. A Generation Event may occur when plant is not operating as designed and/or the protection and control systems, designed to identify when plant is not operating as designed, fail (and to not address plant anomalies).

13.3.4.1 Non-conformances with Generator Performance Standards

In accordance with Stanwell's National Electricity Rules Generator Performance Standards Compliance Procedure, any non-conformance with Generator Performance Standards must immediately be reported to the NER GPS Compliance Coordinator and managed in accordance with the Compliance and Regulatory Management Procedure (GOV-PROC-28). This includes providing immediate notification to the Australian Energy Market Operator (AEMO) in accordance with section 4.15 of the National Electricity Rules and the process documented in the [AEMO Non-Conformance Notice](#) of any non-conformance or potential non-conformance with Generator Performance Standards.

Following notification to AEMO, non-conformances or potential non-conformances with Generator Performance Standards should be recorded as a Generation Event and managed in accordance with this Event Management Procedure.

13.4 Health and Safety Events

13.4.1 What is a Health and Safety Event?

A Health and Safety Event may occur when Our People are exposed to an actual or potential risk to their health and safety, including where there is a serious or dangerous electrical event. Whilst the following list is not exhaustive, it provides examples of what may be identified as a Health and Safety Event:

- an actual injury, illness or disease is sustained (including an electrical shock that is not a serious electrical incident or a dangerous electrical incident);
- Safeguards are not followed, including where Our People:
 - are not fit for work (for example, where fatigue management processes are not followed or a positive Alcohol or Other Drug test is returned);
 - are not trained and competent for the work being performed;
 - are not wearing the correct PPE for the work being undertaken;
 - do not having the appropriate access authorisations in place; and
 - do not following the ATW/PTW procedures; and
- an event required to be notified to Workplace Health and Safety Queensland or the Electrical Safety Office occurs (refer to section 13.4.5 of this Procedure).

A Health and Safety Event may also be a Plant/Equipment Event and/or a Process Safety Event (refer to sections 13.3 and 13.8 of this Procedure).

13.4.1.1 Management of Events involving breaches of Stanwell's Safeguards

Where an Event involves a breach of Stanwell's Safeguards (for example, an ATW/PTW Event) but does not result in actual harm or damage, it should be reported in accordance with this Procedure and recorded as a Near Hit. The impact assessment must consider the specific circumstances to determine what the potential of the Event could be, but the Event is more than likely going to have a potential Health and Safety impact (which may range from Low to Moderate depending on the specifics of the Event).

Any Event that involves a breach of Stanwell's Safeguards must also be recorded as having a Compliance, Low (Level 1) impact, even if the Event is classified overall as being a Near Hit (refer to section 4.3.1 of this Procedure).

For an ATW/PTW Event, the appropriate Event Categories are likely to be Admin/Procedural, ATW/PTW and Compliance Issue.

Alcohol and Other Drugs Events

Where a confirmed positive Alcohol and Other Drugs (AOD) test is returned, it should be reported in accordance with this Procedure and recorded as a Near Hit. The impact assessment must consider the specific circumstances to determine what the potential of the Event could be, but a confirmed positive AOD test is more than likely going to have a potential impact of Health and Safety, Minor (Level 2).

As a confirmed positive AOD test is a breach of Stanwell's Safeguards and AOD Procedure, it must also be recorded as having a Compliance, Low (Level 1) impact, even though the Event is classified overall as being a Near Hit (refer to section 4.3.1 of this Procedure).

13.4.2 What are the specific internal notification requirements for a Health and Safety Event?

The impact of a Health and Safety Event dictates to whom the Event must be notified:

Impact	Notification Requirements	
Severe (Level 5)	Immediately	The relevant supervisor or manager, site Health and Safety Advisor, Site Manager, relevant General Manager, the GM Health, Safety, Environment and Services, the CEO, the Acting EGM Safety and Asset Services and the Acting EGM Production must be notified of the Event immediately.
Major (Level 4)	Immediately	The relevant supervisor or manager, the relevant site Health and Safety advisor and the relevant Site Manager must be notified of the Event immediately.
	Immediately (fatality)	In addition to the above, the relevant General Manager, the GM Health, Safety, Environment and Services, the CEO, the Acting EGM Safety and Asset Services and the Acting EGM Production must also be notified of a fatality immediately.
	As soon as	The relevant General Manager, the

Impact	Notification Requirements	
	practical	GM Health, Safety, Environment and Services, the CEO, the Acting EGM Safety and Asset Services and the Acting EGM Production must be notified of the Event as soon as practical.
Moderate (Level 3)	Immediately	The relevant supervisor or manager and the relevant site Health and Safety advisor must be notified of the Event immediately.
	As soon as practical	The relevant Site Manager, relevant General Manager (if appropriate) and the GM Health, Safety, Environment and Services must be notified of the Event as soon as practical.
	Within 24 hours	The CEO, the Acting EGM Safety and Asset Services and the Acting EGM Production must be notified within 24 hours of the Event.
Minor (Level 2)	As soon as practical	The relevant supervisor or manager must be notified of the Event as soon as practicable.
	Within shift	The relevant Site Manager and the site Health and Safety advisor must be notified of the Event within the shift.
Low (Level 1)	As soon as practical	The relevant supervisor or manager must be notified of the Event as soon as practicable.
	Within 24 hours	The relevant site Health and Safety advisor must also be notified within 24 hours of the Event.

Internal notification for Moderate (Level 3) and above Events is via the Site Manager to the Acting EGM Safety and Asset Services and the Acting EGM Production. It is the responsibility of the relevant manager once notified to notify their manager / executive.

Where a compliance breach has occurred, it must be reported and recorded in accordance with the Compliance and Regulatory Management Procedure (GOV-PROC-28) (and the Compliance Breach Reporting Mechanism).

13.4.3 What are the specific external notification requirements for a Health and Safety Event?

External notification to a Regulator is required on pre-defined incidents under the following pieces of legislation:

- the *Work Health and Safety Act 2011 (Qld)*;
- the *Electrical Safety Act 2002 (Qld)*;
- the *Coal Mining Safety and Health Act 1999 (Qld)*; and
- the *Petroleum and Gas (Production and Safety) Act 2004 (Qld)*.

The Notifiable Incident Checklists (for [health and safety notifiable incidents](#) and for [electrical safety notifiable incidents](#)) are used as a guide to whether or not a Health and Safety Event is notifiable to a Regulator.²²

Where a Health and Safety Event is notifiable to a Regulator, the Manager Health and Safety (Corporate) will determine the requirements for regulatory notification and must be consulted in the preparation of notification content.

External regulatory notification of a Health and Safety must be made as soon as practicable.

²² These notification requirements are current as at 18.05.2014 (the date this Procedure received approval).

13.4.4 What other notifications may be required?

The following special notifications for Health and Safety Events are also required (as appropriate):

Who	What Notification is Required
Stanwell's Internal Legal Team	<p>General Counsel must be notified prior to giving any response to an external party request:</p> <ul style="list-style-type: none"> • for an interview; • to provide a statement; • for access to records; • for any information in relation to an Event or Event relating to an existing or potential criminal or common law matter. <p>Approval of the Legal Officer must also be attained prior to notification of any External Authority and prior to releasing investigation reports to external parties.</p>
Corporate Communications Team	<p>Stanwell's Corporate Communications Team must be notified prior to any planned media contact or immediately following any enquiry regarding media statements. All media contact must be approved and given by approved media delegates of the CEO.</p>
Police	<p>In addition to Workplace Health and Safety Queensland, the Queensland Police Service (QPS) must be notified of all Events involving fatalities.</p>

13.4.5 What level of investigation is required for a Health and Safety Event?

Once the relevant notifications have been made, the relevant Health and Safety advisor and/or the Manager Health and Safety (Corporate), in consultation with site management, can direct the need for a detailed investigation as required. However, a comprehensive investigation will generally be required for all Health and Safety Incidents and Near Hits that are assessed as having an impact of Moderate, Major or Severe. In addition, a more comprehensive investigation may also be required for Events that are notifiable to a Regulator, result in the issuing of a Penalty Improvement Notice (PIN) or a regulatory enforcement notice, or where there was significant potential for injury and it has been determined that a detailed investigation will lead to valuable lessons which will prevent reoccurrence.

The relevant site report template should be used to guide what is required in the investigation. The choice of investigation tools is at the discretion of the Site Manager in consultation with subject matter experts (e.g. the relevant Health and Safety advisor and/or the Manager Health and Safety (Corporate)).

13.5 Information Technology Events

13.5.1 What is an Information Technology Event?

Generally, ICT issues will be excluded from this Event Management Procedure and should continue to be managed through ICT business processes (including the ICT Service Desk process). For the avoidance of doubt, these ICT issues include (but are not limited to) scheduled

interruptions to services, failed software, failed hardware, issues with network infrastructure and lost mobile phones.

However:

- where an ICT issue impacts one or more sites (including corporate offices) or impacts the whole business, it should be managed in accordance with the Crisis Event Evaluation and Escalation Matrix and the applicable Incident Response and/or Crisis Response process. It is at the discretion of the relevant Incident Manager or Crisis Leader as to whether any ICT issues are subsequently recorded in EARS (and managed in accordance with this Event Management Procedure);
- where a security-related ICT issue occurs, it should be managed in accordance with the Crisis Event Evaluation and Escalation Matrix and the Security Procedure.

13.5.2 Information Technology Events that restrict (or could restrict) generation

For the avoidance of doubt, where an ICT issue restricts (or could restrict) Stanwell's ability to operate its generating plant (for example, an issue with Stanwell's supervisory control and data acquisition system (SCADA)²³) it must be reported, recorded and managed in accordance with this Event Management Procedure. These Events should be categorised as both Information Technology and Generation.

13.5.3 Information Technology Events that restrict (or could restrict) trading activities

For the avoidance of doubt, where an ICT issue restricts (or could restrict) Stanwell's trading activities (including the ability to bid and rebid into the spot market), it must be reported, recorded and managed in accordance with this Event Management Procedure. These Events should be categorised as both Information Technology and Trading.

13.6 Land, Property and Tenement Events

13.6.1 What is a Land, Property and Tenement Event?

Any Event occurring on Stanwell's non-operational land should be recorded as a Land and Property Event, even if those Events are also categorised as other types of Events (for example, Health and Safety and/or Environment).

13.6.2 Mining and Gas Tenement Compliance Issues or Breaches

Any issues in relation to, or breaches of, any mining and/or gas tenements held by Stanwell must be reported and managed (including the making of any required external notifications) in accordance with the Compliance and Regulatory Management Procedure (GOV-PROC-28) and recorded in accordance with this Policy. For the avoidance of doubt, this includes any compliance issues or breaches in relation to:

- Mining Leases (MLs)
- Mineral Development Licences (MDLs)
- Exploration Permits for Coal (EPCs) or Minerals (EPMs); or
- Petroleum Pipeline Licences (PPLs); and

²³ SCADA (Supervisor Control and Data Acquisition) refers to a computer system for gathering and analysing real time data. SCADA control systems are a critical component of Stanwell's information technology infrastructure and the daily operation of all power stations.

- Joint Venture arrangements where Stanwell has a percentage interest in the tenement.²⁴

Where these Events arise, they should be categorised as a Land and Property Event. It is likely that these Events will also be able to be classified as other types of Events (for example, a failure to pay a MDL rental on time should also be classified as a Financial Event and a non-compliance with the Environmental Authority for a petroleum pipeline licence may should also be classified as an Environmental Event).

13.7 Other Events

When an Event cannot be categorised as one of the other categories outlined in section 13 of this Procedure, it may be classified as an Other Event. Where this occurs, the specifics of what it is (for example, motor vehicle incident or security) must be recorded.

13.7.1 Vehicle Events

Any Events which involve damage to a vehicle owned or leased by Stanwell (including motor vehicles and forklifts) must be reported and recorded in accordance with this Procedure, irrespective of the value of the damage. Further details about Vehicle Events may also need to be recorded (refer to the Recording an Event in EARS (GOV-WI-31) for further details).

13.7.2 Security Events

Any Events which involve an actual or possible threat to security (including to information, technology, business systems, physical security (of our plant, sites and offices) and/or Our People) must be managed in accordance with the Crisis Event Evaluation and Escalation Matrix and the Security Procedure, and recorded in accordance with this Procedure. These Events could involve theft, intruders accessing (or trying to access) our sites, suspicious activity, mass gatherings or bomb threats.

13.8 Process Safety Events

Process safety is a disciplined framework for managing hazardous operating systems to protect Our People, our sites and the communities that we operate in. Process safety differs from personal safety as it focuses on the hazards that are more likely to result in a major release of energy, such as a gas explosion, as opposed to an incident affecting an individual worker, such as a slip, trip or fall.

13.8.1 What is a Process Safety Event?

Process Safety Events may include plant operational and control Events which affect, or have the potential to affect, people, the environment, our assets or our reputation such as:

- high pressure steam and gas leaks;
- explosions;
- catastrophic failure of high inertia equipment; and
- hazardous chemical releases and chemical reactions.

13.9 Trading Events

Refer to section 13.2 of this Procedure.

²⁴ Stanwell's Mining and Gas Tenement Strategy 2015-17 details the mining and/or gas tenements currently held by Stanwell.