



Global EHSS – Incident Management

CONTROL INFORMATION

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1 Purpose

This document specifies the minimum requirement for sites to comply for all matters related to Incident Management in Micron which includes,

- Good Catch
- Incident Reporting
- Global EHS First Alert
- Incident Investigations
- EHS Lesson Learn (formerly known as Continuous Improvement Tracking – CIT)
- Authorities Having Jurisdiction
- Notice of Violations
- System and documentations

2 Scope

Items	Details								
Site(s) Impacted	<p>This document applies to the following sites: (For NMS site classifications, please refer to this document)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;"><input checked="" type="checkbox"/> FE</td> <td style="text-align: center;"><input checked="" type="checkbox"/> AT</td> <td style="text-align: center;"><input checked="" type="checkbox"/> TD</td> <td style="text-align: center;"><input checked="" type="checkbox"/> Construction</td> </tr> <tr> <td style="text-align: center;"><input checked="" type="checkbox"/> NMS Level 1</td> <td style="text-align: center;"><input checked="" type="checkbox"/> NMS Level 2</td> <td style="text-align: center;"><input checked="" type="checkbox"/> NMS Level 3</td> <td style="text-align: center;"><input checked="" type="checkbox"/> NMS Level 4</td> </tr> </table>	<input checked="" type="checkbox"/> FE	<input checked="" type="checkbox"/> AT	<input checked="" type="checkbox"/> TD	<input checked="" type="checkbox"/> Construction	<input checked="" type="checkbox"/> NMS Level 1	<input checked="" type="checkbox"/> NMS Level 2	<input checked="" type="checkbox"/> NMS Level 3	<input checked="" type="checkbox"/> NMS Level 4
<input checked="" type="checkbox"/> FE	<input checked="" type="checkbox"/> AT	<input checked="" type="checkbox"/> TD	<input checked="" type="checkbox"/> Construction						
<input checked="" type="checkbox"/> NMS Level 1	<input checked="" type="checkbox"/> NMS Level 2	<input checked="" type="checkbox"/> NMS Level 3	<input checked="" type="checkbox"/> NMS Level 4						
Target Audience	Site Leadership Team, Site EHS and All Micron Team members								
Applicability	<p>Sites shall fully meet the requirements outlined in this standard by the Conformance Date stated in the Revision History. Failure to ensure conformance will result in a possible NC in the absence of a recorded and approved Management of Change entry in ehsmoc/.</p> <p>Sites shall, at a minimum, comply with this standard. Wherever local statutory, regulatory or customer specific requirements or a risk assessment establish the need for more stringent requirements to be followed, the site must meet those.</p> <p>These Standard covers:</p> <ul style="list-style-type: none"> • Safety Good Catch • EHS Incident Management Systems • Incident Reporting requirements (Including Timeline and Notice of Violations) • Investigation requirements (Including near miss) • EHS Lessons Learn (formerly CIT or Continuous Improvement Tracking) • Authorities having jurisdiction (AHJ visit requirements) 								

3 Roles and Responsibilities

For Sites where these specific roles are not present, Sites may map these roles to other team members who are authorized/approved to conduct the work/task.

Roles	Responsibilities
<p>Site Vice President and/or Site Leadership Team</p>	<p>Good Catch (GC)</p> <ul style="list-style-type: none"> Encourage GC activities at the Site. Provide resources as necessary for the recognition of high-quality GC. <p>Incident Reporting</p> <ul style="list-style-type: none"> Be aware of the minimum expectations for incident reporting escalations process. Include Global EHS for any initial communications to Executives. Share incident summary, corrective actions, etc. at Frontend Leadership Team/ Assembly & Test Leadership Team Bi-Weekly Staff Meeting for incidents meeting the High - Severity 3 and Critical – Severity 4 banding. <p>Incident Investigation</p> <ul style="list-style-type: none"> Support the investigation of high severity cases, which may include the identification of investigation team, resources required for mitigation actions identified and escalation to the Global Teams for facilitation. Validate the identified corrective and preventive actions has been appropriately supported through the verification of effectiveness process in the EHS Management review. <p>EHS Lesson Learn (EHSLL)</p> <ul style="list-style-type: none"> Site Leadership may be requested to verify responses or actions taken by their sites in response to an EHSLL <p>Authorities having Jurisdiction (AHJ)</p> <ul style="list-style-type: none"> Be informed of AHJ visits at the site (Management Review, Weekly Ops review, etc.) <p>Notice of Violation (NOV)</p> <ul style="list-style-type: none"> Be aware of any NoV issued to the Site by AHJ’s. Provide the necessary resources for stakeholders to resolve NoV that were issued at the Site level. Escalate NOV to Global EHS or Legal Department for assistance
<p>Global EHS</p>	<p>Good Catch (GC)</p> <ul style="list-style-type: none"> Manage and maintain the GC System and its databases. Provide resources as necessary for the recognition of high-quality GC. <p>Incident Reporting</p> <ul style="list-style-type: none"> Maintain the Incident Management software, database, and the necessary licenses for its use. Issuance of Global EHS First Alert or EHS Event Sharing to the Micron network. Maintain this standard, and all resources related to Microns Incident Management Review incidents for potential global applicability. Issue and track EHS Lessons Learn (Formerly known as Continuous Improvement Tracking or CIT), when needed. Manage the review of First Alerts in the Global Safety Council or any other forums, as needed.

Roles	Responsibilities
	<p>Incident Investigation</p> <ul style="list-style-type: none"> • For Critical – Severity 4 EHS Events, the Global EHS Directors may identify members of the Global EHS team to participate in the incident investigation including leading, supporting, or acting as a subject matter expert. In such cases, specific responsibilities may include: <ul style="list-style-type: none"> ○ Ensuring consistency and quality of the investigation ○ Acting as a liaison between the site investigation team and the Global EHS Leadership team ○ Determining restart criteria ○ Supporting any request for resources for ongoing investigations • Verify the effectiveness of corrective and preventive actions of high severity incidents (High – 3, Critical - 4, PLAI’s and LAI’s) during Global EHS Internal audits. <p>EHS Lesson Learn (EHSLL)</p> <ul style="list-style-type: none"> • Identify potential EHSLL (internal or external) that may affect or benefit the Micron network. These may include, <ul style="list-style-type: none"> ○ Incidents within the Micron network ○ Incidents within the Semiconductor Industry ○ Incidents that are not related to the Semiconductor Industry but with high value learning. • Maintain and update, when necessary, the EHSLL business process • Generate, update (where necessary) and track closure of EHSLL issued. • Ensure, where necessary, updates to standards, training material and other resources are made upon closure of the EHSLL. <p>Authorities having Jurisdiction (AHJ)</p> <ul style="list-style-type: none"> • Be informed of AHJ visits at the site (alias: EHSALERT) <p>Notice of Violation (NOV)</p> <ul style="list-style-type: none"> • Be informed of any NoV issued to the Site by AHJ’s. (alias: EHSALERT) • Provide the necessary resources, if required, to assist in the closure of NoV’s
<p>Site EHS / EHS Representative or Stakeholders</p>	<p>Good Catch (GC)</p> <ul style="list-style-type: none"> • Manage and maintain the effectiveness and integrity of the GC system for the Site. • Encourage the usage of the GC by Team members. • Should provide recognition for Team Members that submits and identify high value GC. <p>Incident Reporting</p> <ul style="list-style-type: none"> • Understand the Incident Reporting Requirements and the usage of the severity table. • Ensure that all communication of High – Severity 3 and Critical – Severity 4 EHS events beyond the site level include Global EHS • Provide the necessary experience and training for Site EHS Team Members to collect and preserve any evidence due to a EHS event. • Submit EHS events into the EHS Management System Database within the stipulated timeline as documented in this standard to trigger the Global EHS Notification when the severity threshold is met. • Manage and update the Sites EHS Event data in the EHS Management System Database • Provide relevant updates for incident containment and initial actions progress. • Alert/Inform Site Vice President (or Site Leadership) of EHS Events that meet the criteria outlined in the Global EHS Incident Severity Ranking Table

Roles	Responsibilities
	<p>Incident Investigation</p> <ul style="list-style-type: none"> • Ensure that the EHS Site representative is trained and experience to manage the investigation based on the severity level of an Event • Support and manage resources for investigation which may include, <ul style="list-style-type: none"> ○ Identifying EHS Team member to facilitate the investigation. ○ Review of identified root causes (Occurrence, Escape and Systemic) for correctness. ○ Ensure Corrective and Preventive Action (CAPA) plans correctly address identified root causes. ○ Handover and support PSM Incident Investigations ○ Determine the restart criteria, in consultation with Stakeholders, when needed. ○ Facilitate the validation of implementation of identified action items. ○ Facilitate the verification of effectiveness of identified action items. • Shall ensure that the investigation process follows the Micron 8D process. • Seek Global EHS assistance, when required. • Point of Contact between Regulatory Agency & Micron for the site, when required. • Consult with the Legal Department, when required. <p>EHS Lesson Learn (EHSLL)</p> <ul style="list-style-type: none"> • EHS stakeholders shall coordinate all site activities and response for all EHSLL action items. • If a EHSLL originates from a Site, they are to provide the information regarding the event, root causes and CAPA. <p>Authorities having Jurisdiction (AHJ)</p> <ul style="list-style-type: none"> • Inform Global EHS and Legal for any AHJ visit at the site (alias: EHSALERT) <p>Notice of Violation (NOV)</p> <ul style="list-style-type: none"> • Informed of any NoV issued by AHJ’s to Global EHS, Legal Department and Site Leadership. (alias: EHSALERT) • Provide the necessary resources to stakeholders to close out NOV’s issued at the Site
<p>Area Owner or Supervisor</p>	<p>Good Catch (GC)</p> <ul style="list-style-type: none"> • Review, approve and close GCs submitted by their team members • Facilitate any closure of GC’s that are not closed by their team members. <p>Incident Reporting</p> <ul style="list-style-type: none"> • Report any EHS Events to the Site EHS as soon as possible <p>Incident Investigation</p> <ul style="list-style-type: none"> • Lead and manage the EHS Investigation with support from Site EHS and Stakeholders
<p>Team Members</p>	<p>Good Catch (GC)</p> <ul style="list-style-type: none"> • Attempt to resolve GCs that were identified prior to submission. • Work with their Supervisor to resolve GCs prior to submission <p>Incident Reporting</p> <ul style="list-style-type: none"> • Report all EHS event that have occurred to them or in their area including near misses to the Site EHS or their Supervisors <p>Incident Investigation</p> <ul style="list-style-type: none"> • Support the investigation process

4 Terms and Definitions

Terms	Definitions
Correction (or Containment Action)	Temporary measures that are put in place to prevent the recurrence of a detected nonconformity until a root cause has been identified and eliminated. These actions are not long-term solution.
CA (Corrective Action)	Action to eliminate the cause of a detected nonconformity or other undesirable situation to prevent recurrence
PA (Preventive Action)	Action to eliminate the cause of a potential nonconformity or other potential undesirable situation to prevent their occurrence.

Terms	Definitions
Illness	A condition that results from exposure in a workplace to a physical, chemical or biological agent to the extent that normal physiological mechanisms are affected, and the health of the worker is impaired. This may include, but is not limited to, skin diseases, respiratory conditions, poisoning, hearing loss, heat stroke, radiation exposure, etc.
Incident Stabilization	An incident stabilization is defined as the time when all emergency response activities have been completed and the Incident Area deemed safe for entry by the ERT Lead that is in command at the scene.
EHS Event	An EHS Event is a broader term used for observable occurrence or situation that can potentially lead to harm or injury that meets the reporting requirements in this Standard. Example: A EHS event can be <ul style="list-style-type: none"> • Slippery floor • Distracted Walking • Open acid container
EHS Incident	An EHS Incident is a EHS Event that has led to a harmful or near occurrence that requires resources to manage and investigate to closure. Example: A EHS Incident can be <ul style="list-style-type: none"> • Someone slipping on the floor and injuring themselves • Someone trip and fall due to distracted walking • Chemical Spill due to the open acid container
Injury	Any damage to the body because of traumatic (acute or chronic) episode such as a fall, being struck, ergonomic injuries, etc.
Near Miss	An undesired event that under slightly different circumstances could have resulted in harm to people, damage to property, equipment or environment or loss of process.
Root Cause Analysis	An acceptable analytical methodology used to determine the underlying causes or deficiencies in work activities or processes that either resulted in or could result in an incident. For Micron, the usage of the 8D process is required for Events with severity level 3 & 4 as it includes an RCA. For severity 1 & 2 Events, the type of RCA used is at the Site's discretion.

5 References

Internal References	Link
Process Safety Event Tier Evaluation Tool	WFT6NJ3WDNAT-65211962-2325
EHS Alert	EHS Alert Notification SharePoint
ServiceNow Incident Management System	Homepage
Incident Management Collaboration Site	Incident Management SharePoint
Global EHS – Occupational Health Standard	Global EHS - Occupational Health Standard
Global EHS – Emergency Response Standard	Global EHS - Emergency Response Standard

External References	Link
Nil	Nil
Nil (for external references without links)	

6 Document Control

Items	Details
ECN Facility	CORP EHS
ECN Area	EHS SAFETY
Approval	This document is approved by: GLOBAL_EHS_SEAL_LT
Notification	<p>Notification of changes to this document is managed through Micron’s Engineering Change Notification (ECN) process to the following:</p> <p><u>Leadership Team</u></p> <ul style="list-style-type: none"> • FLT • ATLT <p><u>EHS</u></p> <ul style="list-style-type: none"> • GLOBAL_EHS • GLOBAL_EHS_MANAGERS • GLOBAL_EHS_SEAL_LT • GLOBAL_EHS_TEAM_MEMBERS • GLOBAL_EHS_NMS_MANAGERS • GSC • ENVIRONMENTAL_COUNCIL • GLOBAL_EHSAUDIT_COUNCIL • GLOBAL_EQUIP_REPS • GLOBAL_ERT_REPS • GLOBAL_IH_REPS • GLOBAL_OH_REPS • GLOBAL_ERGO_REPS <p><u>PSM</u></p> <ul style="list-style-type: none"> • PSM • PSM_CORP • PSM_MGR <p><u>Facilities</u></p> <ul style="list-style-type: none"> • GLOBAL_FAC_MANAGERS • GLOBAL_FAC_NOTIFY • GLOBAL_FAC_ALL_SITES_NOTIFY • GLOBAL_FAC_PM_MANAGERS • GLOBAL_FAC_CONSTRUCTION_MGRS • GFTT_LEADS • WW_FACILITIES_MANAGERS_APPR
Review	This document will be reviewed at least biennially (once per two years) by Global EHS / PSM through the Periodic Document Review (PDR) process.

7 Revision History

Rev	Revision Date	Description	Requestor	Conformance Date
0	14 Nov 2024	ECN Number: 101175924 First published version	DZULEZWAN	

8 Standard

Micron acknowledges the significance of EHS incident reporting and investigation in the context of a robust Environmental, Health, and Safety Management System. By adhering to a systematic method for incident reporting and investigation, it becomes possible to spot and mitigate patterns in incident types, and to uncover potential enhancements across the Micron Network.

To realize this, Micron has implemented two resolution processes for EHS Events, each of which will be managed by distinct stakeholders. The key differences between the two resolutions are,

- The actual occurrence of a EHS Event
 - If Event has yet to occur, the Good Catch process is followed
 - If Event has occurred, then the EHS Incident Management process is followed
- Stakeholders
 - Good Catch is a Team Member lead resolution
 - EHS Management System is a Process led resolution (i.e. 8D)

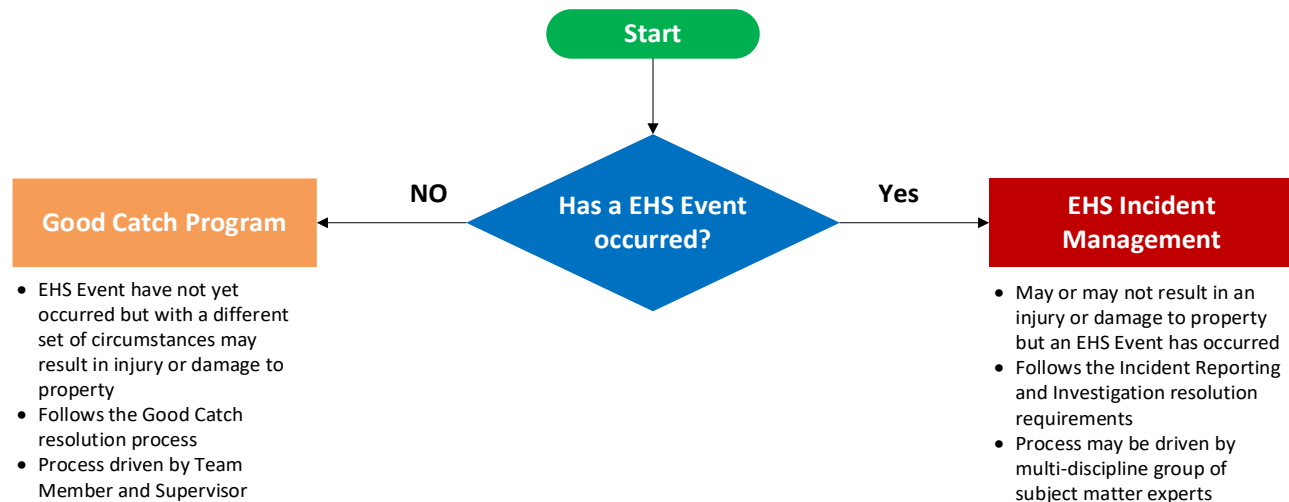


Figure 1: EHS Event resolution process flow

8.1 EHS Good Catch Program

The purpose of the Good Catch program is to also foster a sense of safety consciousness and a positive safety culture through safety mentoring and accountability for safety.

A Good Catch is characterized as a condition or behavior that has the potential to cause harm or property damage if not addressed or intervened.

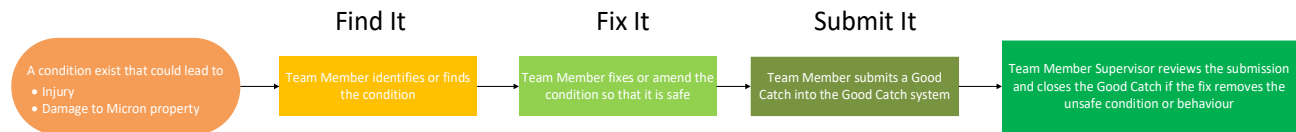


Figure 2: Good Catch process flow

8.1.1 EHS Good Catch requirements

The criteria for submitting and closing a EHS Good Catch are as follows:

- A hazardous situation or unsafe behavior and no incident has transpired at a Micron Manufacturing or Non-Manufacturing Site. This program is not accessible for Micron Construction developments or contractors due to the restricted accessibility of the Micron network.
 - For contractors, the Micron Host can submit a Good Catch on their behalf.
- An intervention or action is necessary to avert any potential injuries or property damage.
- The individual submitting the Good Catch shall strive to rectify the hazardous situation or coach the unsafe behavior.
- The submitter of the Good Catch shall furnish proof that the situation or behavior has been rectified.
- If the team member is incapable of resolving the Good Catch, interim measures must be implemented to ensure that an EHS incident does not transpire.
- If a Team Member is unable to resolve a Good Catch due to certain circumstances, the Supervisor shall resolve the Good Catch by collaborating with the relevant stakeholders.
- The Supervisor of the Team Member must confirm that the resolution provided by the team member is feasible and practical before accepting and closing the Good Catch.
- All EHS Good Catches shall be closed within 10 days of their submission.
- If a Good Catch necessitates a lengthy lead time for the resolution, stakeholders should establish an appropriate tracking system (ETI, FMS, ETC) for transfer. For instance, if a piece of equipment requires a 4-week lead time for a part order, the resolution should be inputted into the Good Catch, including the ETI tracking number or facilities work order, and the Good Catch can then be closed.

8.2 EHS Incident Management

The EHS Incident Management is an all-encompassing and methodical procedure that aids in the reporting and investigation of EHS events that has occurred at any Micron location (including Construction sites)

All the stipulations mentioned henceforth will only be applicable once all Emergency Response measures or tasks have been executed and the EHS incident has been brought under control (stabilized).

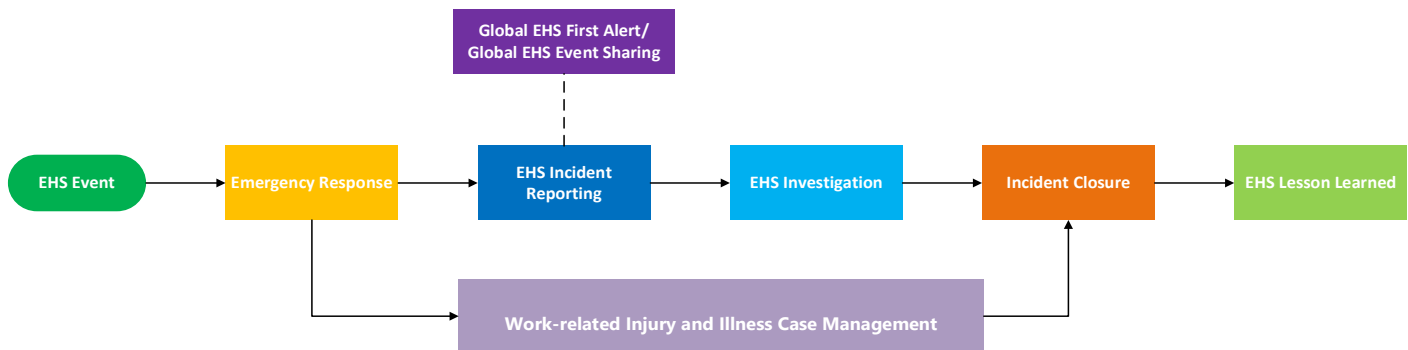


Figure 3: EHS Incident Management business process

8.2.1 Emergency Response

At a minimum, the following requires activation of the emergency response team who would go to the scene and establish incident command until all EHS concerns have been addressed. The scene can then be given to equipment/area owners to begin recovery or investigation:

- Loss of primary containment of any chemical (system or container), gas (system or container) waste stream, water-based system (such as PCW), etc. Any releases of hazardous (toxic and combustible) gases and chemicals
- Activation of gas alarms, leak alarm or other TGM alarm
- Excludes “trouble” or maintenance alarms.
- Activation of fire alarm and/or fire suppression system
- Reports of smoke, fires, energetic releases, or explosions
- Weather-related hazards and natural disasters with EHS impact
- Vehicle accidents
- Power outage or system failures
- Medical emergencies, including injuries and illnesses that occur outside of a clinical setting.
- Unknown odors
- Rescue situations, including but not limited to, work at height rescue, confined space, trench, entrapment (AKA: person vs. machine), elevator rescue, etc.
- Releases of any chemicals or waste streams to site grounds, waterways, or atmosphere
- The presence of blood or bodily fluids. This may not warrant an emergency response, however ERT should assist and document the occurrence.
- Any impact to production that causes long-term implications, i.e. AMHS track down, unable to obtain materials from suppliers, i.e. gasses helium etc.
- Any evacuation of personnel from a building.
- Any transportation (US: DOT) incident involving chemicals/gases reported to the site involving Micron shipment.

- Any near miss events reported to a control room that had the potential to cause personal injury or property damage.
- Anything perceived to be an emergency or EHS hazard that needs immediate attention by trained emergency personnel.
- Any other event as required by regulation where the facility operates.

8.2.2 Work-related Injury and Illness Case Management

All work-related injury and illness must be reported in via the ServiceNow Incident Management System and monitor team member's recovery progress, medical care, and restricted workdays till case closure in compliance with requirement from Global EHS – Occupational Health Standard.

8.2.3 Global EHS Incident Reporting

The stipulations that will be mentioned hereafter pertain solely to incidents of 'High – Severity 3' or 'Critical – Severity 4'.

All other severity levels are excluded from this requirement, unless there is a level escalation, for instance, if a 'Moderate – Severity 2' incident is escalated to a 'High – Severity 3' due to the impact of an injury.

8.2.3.1 Global EHS Injury Reporting Classification

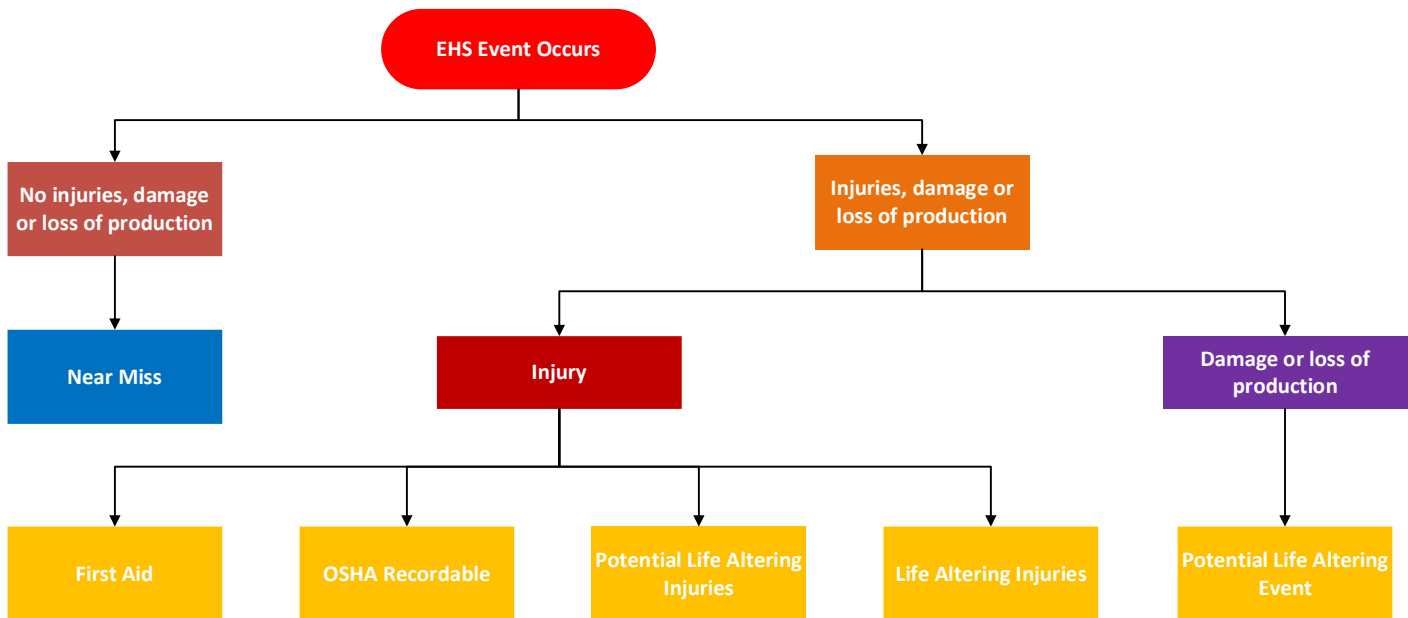


Figure 4: Injury Classification

- **Near Miss**
 - An undesired event that under slightly different circumstances could have resulted in harm to people, damage to property, equipment or environment or loss of process.
 - A root cause analysis may be required for near misses to prevent it from potentially causing injury, damage, or loss of production in the future.
- **First Aid**
 - A first aid is defined as the initial and immediate assistance given to any person suffering from either a minor or serious illness or injury. This care is provided to preserve life, preventing a condition from worsening or promote recovery until professional medical services arrive.
 - The classification of an injury shall factor in any medical care that is administered following the initial provision of first aid. If a person requires treatment that goes beyond first aid (as stipulated by OSHA), the classification shall be upgraded.
- **OSHA Recordable**
 - An “OSHA recordable” is a term used to denote work-related injuries, illnesses, and fatalities that employers are mandated to record in accordance with the Occupational Safety and Health Administration (OSHA) guidelines. An injury or illness is deemed to meet the general recording criteria, and thus is recordable, if it leads to any of the following:
 - Fatality
 - Absence from work
 - Restricted work or job transfer
 - Medical treatment beyond first aid
 - Unconsciousness
- **Potential Life Altering Injury (pLAI)**
 - Injuries that could have resulted in a life altering injury.
- **Life Altering Injury (LAI)**

- A life altering injury is typically characterized as an injury that is so severe that it leads to a form of permanent disability, enduring health issues, and/or a decrease in a person’s life expectancy.
 - Such injuries are also known as traumatic or catastrophic injuries and can lead to permanent or long-term impairment or loss of function of an internal organ, body function, or body part.
 - It is crucial to note that these injuries are often the outcome of serious incidents or accidents and understanding their root causes can assist in the implementation of effective safety measures and prevention strategies.
- **Potential Life Altering Event (pLAE)**
 - Events that result in either damage or process losses that could have resulted in a catastrophic or life altering injuries.

8.2.3.2 Global EHS Incident Reporting Process Flow

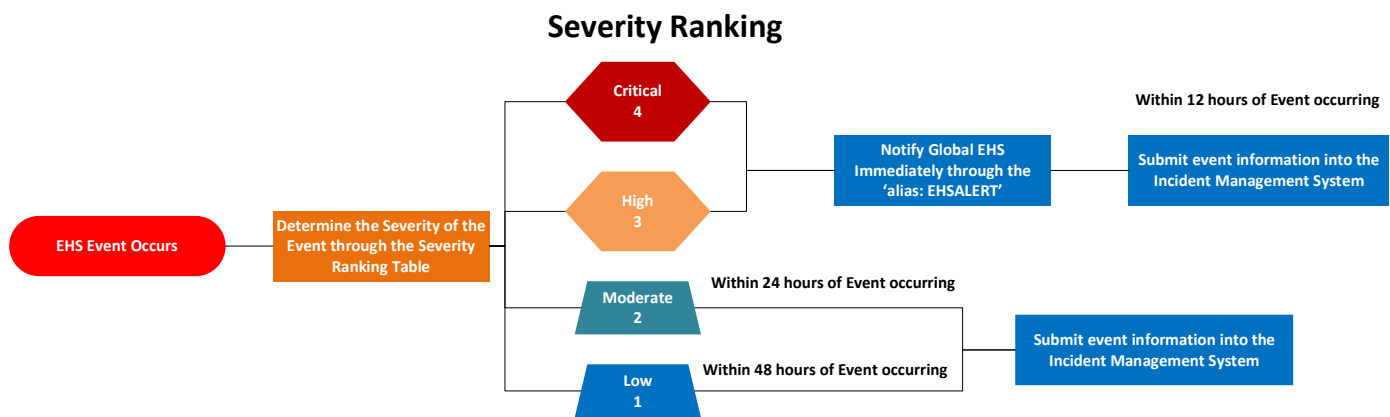


Figure 5: Incident Reporting business process

- All Micron Sites should refer to [Appendix 1: Incident Severity Table](#) for guidelines on the severity ranking of an Event. The Incident Severity Table is a reference with examples of common events that have occurred in the past and their designated severity levels.
- In cases where a single event resulted in multiple outcomes, the outcome with the highest severity will dictate the overall severity of the incident.
- When in doubt, always select and report the higher severity.

8.2.3.3 General Requirements for Reporting

- **🚨 For EHS events with the Severity Banding of ‘High–Severity 3’ & ‘Critical–Severity 4’**
 - When aware of an EHS Event that fulfils these criteria, Sites shall submit a Global EHS Pre-Alert on the EHS Pre-Alert Portal (alias: EHSALERT).
 - This pre-alert only requires the severity and the brief description of the EHS Event.

- **EHS Event Communications for EHS events with the Severity Banding of ‘High–Severity 3’ & ‘Critical–Severity 4’**
 - Sites shall include Global EHS in any communication from Site to Leadership or Executive teams with regards to the event.

- **Critical Timelines**

Severity	EHS Pre-Alert	Incident Management System
Critical – 4	Immediate	Submission within 12 Hours
High – 3	Immediate	Submission within 12 Hours
Moderate – 2	Not Required	Submission within 24 Hours
Low- 1	Not Required	Submission within 48 Hours

Table 1: Incident Reporting business process

- **External Reporting Requirements**
 - Site EHS shall coordinate the communications and reporting to Authorities having Jurisdiction when there are incidents that meet regulatory thresholds for reporting.
 - Site EHS shall inform the Site Leadership team and Global EHS of the regulatory reporting through identified channels.
- **EHS-PSM Collaboration**
 - Site EHS shall inform Site PSM of any process related event that occurs at the site.
 - Site EHS shall determine this through the [Process Safety Event Evaluation Tool](#) for Site PSM involvement.

8.2.4 Global EHS First Alert and Event Sharing

A Global EHS First Alert or Event Sharing is a situational update of a high severity EHS event to the Micron Global network.

When applicable or relevant, Global EHS is responsible for transmitting the Global EHS First Alert or Global EHS Event Sharing to the Micron Global network.

The First Alert or Event Sharing will be released within 2 business days of submission to Global EHS to facilitate the initial investigations that are required at the site to gather relevant information on the event.

8.2.4.1 General Requirements for First Alert and Event Sharing

- EHS Events may originate from within the Micron Network or from external sources.
- Critical – Severity 4 EHS events will automatically be qualified as a Global EHS First Alert
- High – Severity 3 EHS events will be reviewed for relevance to the network.
- Site EHS is responsible for disseminating the details contained in the First Alert or Event Sharing, along with any following updates, to the appropriate stakeholders (including Contractors). This can

be done through suitable channels like Site EHS Committees, Operational Reviews, Management Reviews, etc.

8.2.5 Global EHS Incident Investigation

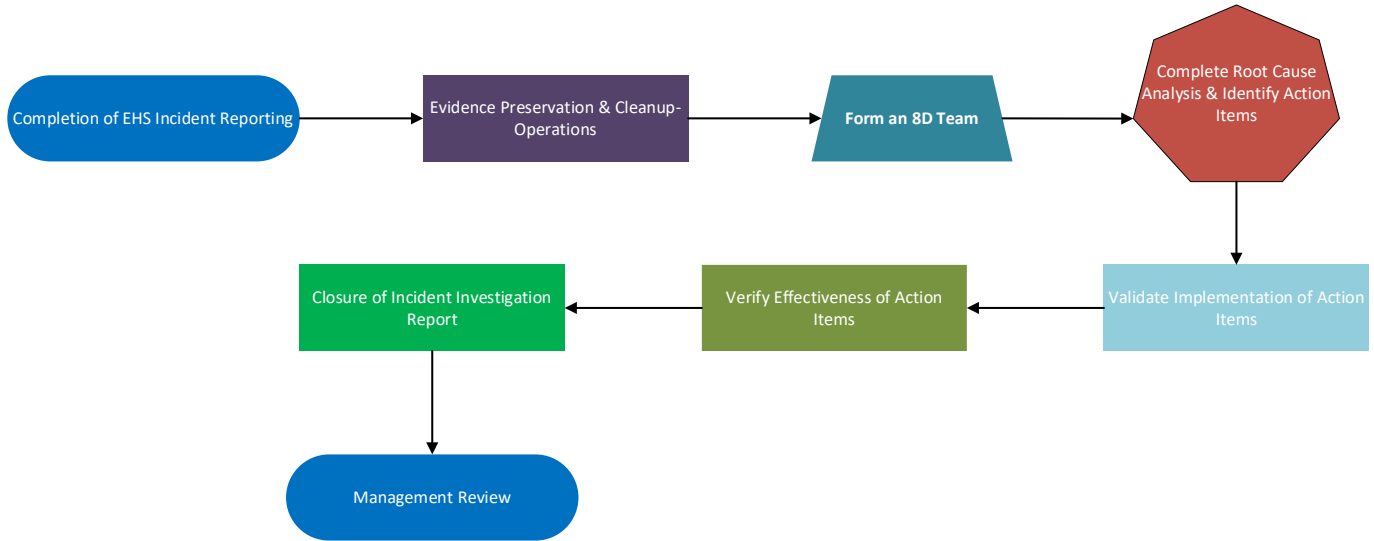


Figure 6: Incident Investigation business process

8.2.5.1 General Requirements for EHS Incident Investigation

Severity Category	Actions Required	
	Submit 8D to Global EHS	Root Cause Analysis
Critical (4)	Required	Part of the 8D process
High (3)	Required	Part of the 8D process
Moderate (2) (with LAI potential)	Required	Part of the 8D process
Moderate (2) (with no LAI potential)	Not Required	Required
Low (1)	Not required	Not Required
Near Miss (with LAI potential)	Required	Part of the 8D process

Table 2: Incident Investigation requirements

- **Global EHS Incident Investigation process**
 - All EHS Events that meets the threshold for an 8D shall follow the Micron 8D process.
 - Team Leader for the 8D team shall always be the Supervisor or Head of Department of the injured individual or the Supervisor of the Equipment Owner
 - Site EHS shall facilitate the investigation process by assisting the Team Leader.

- **Critical Timeline for Incident Investigation**
 - For all severity categories with normal complexity
 - Root Cause Analysis must be completed within 2 weeks or 14 days of incident stabilization.
 - **For High (Severity 3) and Critical (Severity 4) Severity levels with complex conditions**
 - Root Cause Analysis must be completed within 30 days of incident stabilization.
 - Determination of normal complexity and complex conditions will be discussed with the Global EHS representative.
 - **Return to Normal Operations – Restart Criteria**
 - Return to Normal operations will not have a set timeline and is dependent on the following,
 - Restart Criteria have been determined by stakeholders and Permission for restart has been received.
 - Restart Criteria may consider temporary safety precautions like limited access, provisional containment, interim monitoring, or periodic checks. These short-term safety measures shall not be made permanent.
 - Cordoning of area for evidence preservation has been completed.

Severity Category	Permission for Restart
Critical	Site EHS or PSM Manager in consultation with Global EHS or PSM
High	At a minimum, Site EHS or PSM Manager (Site VP, Legal or Global EHS or PSM may be consulted).
Moderate	At a minimum, Area Manager/Supervisor or Site EHS Team
Minor	

- **Validation of Implementation of action Items**
 - All action items resulting from an Incident Investigation will have to be validated that the implementation meets the original purpose of the action item.
 - If the action items do not fulfill their intended purpose, they must be revised to align with their original purpose unless the changes made during the implementation,
 - Highlight potential deficiencies and rectify them while still achieving the overall objective.
 - Implementation of the action item will not meet the purpose of which it was intended for.
 - It is not reasonable nor practicable to implement the action item due to circumstances.
 - Shall be completed within 7 days of the implementation of corrective/ preventive action.
- **Verification of Effectiveness of action items**
 - All action items that have completed the Validation of Implementation are required to be verified for their effectiveness in controlling the existing risk that caused the EHS Event.
 - If the action items fail the Verification of Effectiveness, the Investigation Team shall modify or change the action item to mitigate the identified root cause and repeat the process.
 - Shall be completed within 365 days of Validation of Implementation of Action items.

● **Incident Report Closure**

- All Investigation Reports shall only be closed when,
 - All the actions that have been outlined in the report have been completed.
 - Verification of Effectiveness has been completed.
 - All information has been updated into the Incident Management System
- In most EHS incidents, the injury, and its following medical case management are resolved before the incident report is closed. If the medical management extends beyond the completion of the Verification of Effectiveness by 6-months, the Site has the authority to close and finalize the Management review of the EHS Event.
- If, during or upon completion of a medical case management, it is determined by the medical professionals that the injury has escalated to a Life Altering Injury, the Site must undertake the necessary steps.
 - Reinitiate the Incident Investigation to ensure that the Root Cause and subsequent action items align with the severity of the injury.
 - Notify Site Leadership and Global EHS about the escalation in injury classification.
 - Update the Incident Management System with the revised injury classification within 12 hours.

8.2.6 Global EHS Lesson Learn

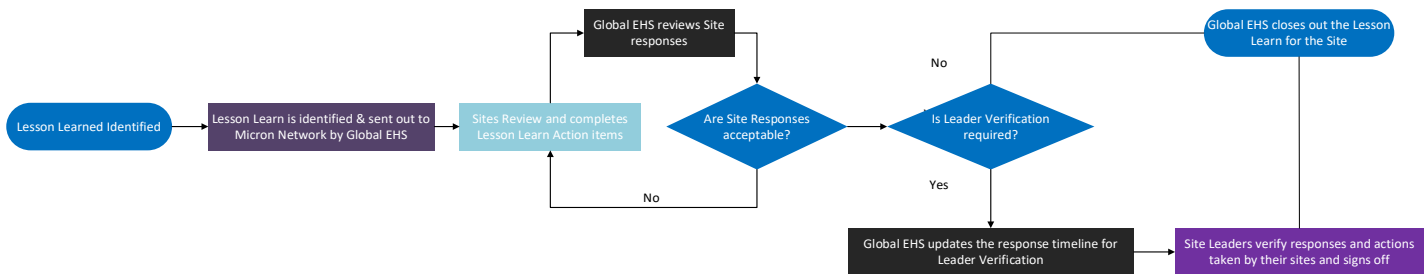


Figure 7: Global EHS Lesson learn business process

8.2.6.1 *General Requirements for Global EHS Lesson Learn*

- Global EHS Lesson Learn may be released based on the following criteria's,
 - EHS Event Investigation has been completed.
 - Impact more than one site in the network
 - High severity potential of at least High – Severity 3
 - An external event that has a high incidence of likelihood in the network
 - First Alerts that requires Site follow up via a Lesson Learn
 - EHS Events that do not result in injuries but have the potential to severely affect the safety and health of individuals at multiple locations.
 - Level 2 Audit findings from external or Global EHS audits or noteworthy strengths
 - Regulatory changes, or Interested Parties, Safety communications from suppliers, etc.
- Global EHS Lessons Learn shall only be released by Global EHS once an EHS Event investigation has been completed to ensure that the action items identified are relevant to the Micron Network
 - In certain instances, a Lesson Learned may be shared before the investigation is completed, depending on the severity and urgency of the Event in relation to the Micron network.
- If a Lesson Learn is specific for other Global Team, i.e., Operation Central Team, Global Facilities, etc., another Lesson Learn will be released specific to the group.
- Action Items will be identified by Global EHS based on the potential risk and event has on the Micron Network
- All Action Items highlighted in a Lesson Learned must be completed promptly. This is to ensure that Global EHS can perform a verification process to validate the risk across the network.
- Should an extension be required, Sites are to provision for extension with the Lesson Learn owner, one week prior to the Lesson Learn due date.
- A Lesson Learn closure will be released by Global EHS once the Lesson Learn has been completed and reviewed. Information will be shared in respective forums.
 - Upon closure of Lesson Learn, Global EHS Program Managers are required to ensure that all actions are captured in the relevant Global EHS Standards

8.3 Authorities having Jurisdiction (AHJ) visits & Notice of Violation Reporting

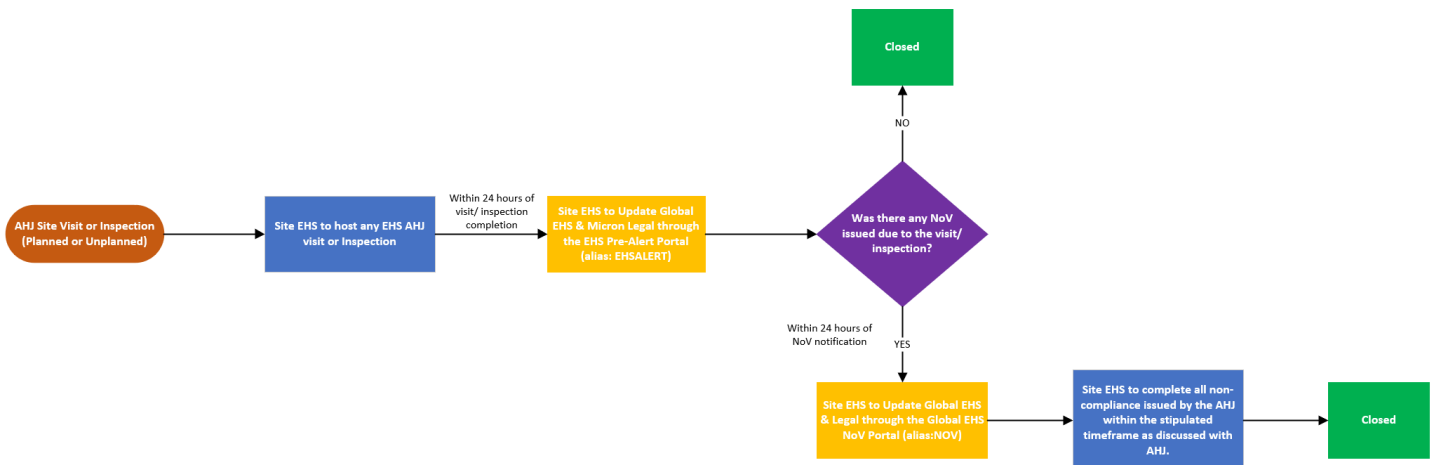


Figure 8: AHJ & NOV business process

8.3.1 General Requirements for reporting Authorities having Jurisdiction visits.

- Site EHS shall host and manage all EHS related AHJ visits or inspections to the site.
- Site EHS is required to document and keep a record of any potential infractions identified during the Authority Having Jurisdiction (AHJ) site visits or inspections.
- Once the Site visit or inspections by AHJ are completed, Site EHS is required to notify Global EHS and the Legal department about the visit or inspection if the EHS Inspection or regulatory visit could likely result in an NOV through the EHS Alert portal (alias: EHSALERT)

8.3.2 General Requirements for Notice of Violation Reporting

- Site must make sure that all Notices of Violations are reported to the Site VP, Global EHS Leadership, and Micron Legal within 24 hours of receiving the AHJ's notification.
- Any inquiries, disputes, and reviews with the AHJ can be further pursued after the communication with Global EHS and Micron Legal has been completed.
- The site is required to develop corrective and preventive actions to ensure they return to compliance with the stated requirements, standards, codes of practice, or regulations as violated in the Notice of Violation.
- Sites must strictly follow the timeline specified in the NoV to achieve compliance or as otherwise negotiated with the AHJ.
 - Should there be agreed changes to the timeline, the site must keep the communication documentation that shows the timeline changes with the AHJ.

8.4 Incident Management System

Global EHS has selected ServiceNow as the service provider for all data related EHS issues.

Sites must ensure that all EHS-related events are submitted into the ServiceNow Incident Management System within the timeline required as scheduled in [Table 1: Incident Reporting business process](#).

Sites must report any EHS events listed in the Incident Reporting Severity table into the ServiceNow Incident Management System. For any other events not listed or unsure of reporting requirements, please contact Global EHS for further clarification.

Global EHS will be reviewing the data monthly and Sites will be required to validate the data that they have entered to be accurate and to maintain the integrity of the data management system.

Discrepancies in the data entered will be investigated and may be escalated to Site Leadership, as necessary.

8.5 Training

Global EHS has developed or identified training for all core competencies within this standard.

Sites are to review the applicability of the training and self-assign if required in their EHS Learning Need Analysis.

For any training that is not listed, Sites are to contact the Global EHS WD team to determine relevant training in the context of its needs.

Micron 8D training

[Global EHS – 8D Team leader \(global_hs_044\)](#)

[Global EHS – 8D Team Member \(global_ehs_043\)](#)

Incident Reporting

[Global EHS Bootcamp Module - Witness Interview - R&A \(R&A 1186815 Multi-Language\)](#)

9 Appendices

Appendix 1: Global EHS Severity Table

Category		No / Low	Moderate	High	Critical	
		Severity 1	Severity 2	Severity 3	Severity 4	
Safety & Construction Operations	Injuries/ Illness (EHS Consequences)	No injuries	Any injuries or near miss with LAI potential	Injury with hospitalization (warded more than 24 hours)	Fatality (Incl personal medical)	
		First Aid Cases	Injuries requiring transport & treatment at the Emergency Room	Two or more individuals with OSHA Recordable injuries (e.g., requiring care beyond first aid) in the same incident. Includes illnesses such as dermatitis and heat-related illnesses.	Life threatening injuries	
		Personal Medical		Temporary loss of senses (Vision, hearing, touch, smell & taste). Includes permanent hearing threshold shift.	Permanent loss of senses (Vision, hearing, touch, smell & taste)	
		OSHA Recordable with no LAI potential			Any Injuries to members of public	
		Injuries that require off-site non-emergency but urgent/hospital care				
	ERT	Evacuation	Unintentional Evacuation of any building	Localized evacuation due system/ monitoring alarm	Evacuation of building with EHS consequences	Sitewide Evacuation with or without EHS consequences Evacuation of multiple buildings with or without EHS consequences
			Evacuation of building with no EHS consequences			
		Fire	Smoke Odor, Smoldering or small brush fires	Incipient or any fire on site that requires external response	Fire or thermal activity that resulted in sprinkler or suppression system discharge/ activation	Chemical fire in area not designed for fire containment
			Water flow alarm with no fire	Accidental discharge of sprinklers or fire suppression system with no EHS consequences	Chemical fire in enclosure designed for fire containment	Fire where any suppression system failed to activate
					Accidental discharge of sprinklers or fire suppression system with EHS consequences	Structural fire that required external response
		Rescue	Elevator rescue with no EHS consequences	Any rescues with 'Moderate' or below EHS consequences	Any rescue with 'High' EHS consequences	Advanced machinery extrication with or without EHS consequences
			Rescue from height with no EHS consequences	Simple machinery extrication with injury limited to digits	Simple machinery extrication beyond digits	Any rescue with 'Critical' EHS consequences
			Any other technical rescues with no EHS consequences	Any rescues or extrication that requires external response		

Category	No / Low	Moderate	High	Critical
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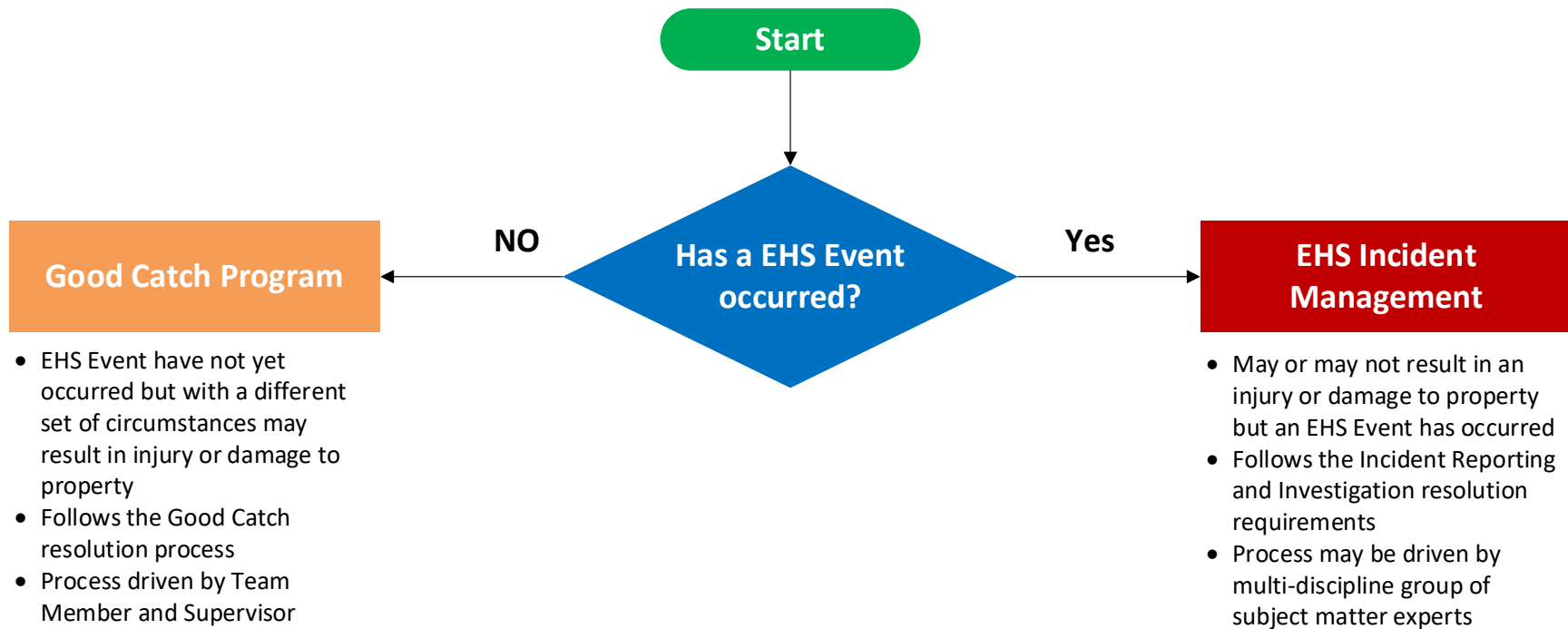
		Severity 1	Severity 2	Severity 3	Severity 4
Safety & Construction Operations	Equipment & Process	Damage to equipment with no EHS consequences (inc natural disasters)	Damage to equipment with EHS consequences (incl natural disasters)	Significant interruption to production due to EHS incident	Major interruption to production due to EHS incident requiring mitigation efforts exceeding 1 shift
			Minor unexpected or unplanned chemical reaction resulting in a EHS incident	Unexpected or unplanned chemical reaction resulting in small incipient fire with EHS consequences	Unexpected or unplanned chemical reaction resulting in fire or explosion with EHS consequences
	Building Site	Little or no property damage	Damage that requires minor restoration to infrastructure	Damages that require significant infrastructure restoration	Severe damage that leaves the building unable to be occupied
	Construction		Working at height incident with no EHS consequences	Crane collapse with no EHS consequences	Crane collapse with EHS consequences
			Confined space incident with no EHS consequences	Structural collapse with no EHS consequences	Structural collapse with EHS consequences
				Working at height incident with EHS consequences	
				Confined space incident with EHS consequences	
	Others			Activation of site crisis management/ BCP team due to EHS operations	Any EHS related incident that is greater than what was outlined in 'High'
				Explosion (detonation or deflagration), rapid pressure release with damages	Formal notice from regulatory agency or AHJ with intent to disrupt or stop site operations due to EHS incident at site
				Regulatory Agency or AHJ Site visit/ inspections that are related to a EHS incident at the site	Any media activities at site due to EHS incident

Category	No / Low	Moderate	High	Critical
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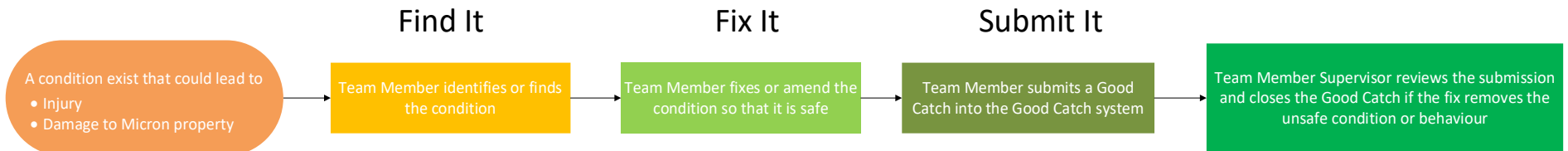
		Severity 1	Severity 2	Severity 3	Severity 4
Safety & Construction Operations	Gas (TGM/ HPM)	Inert gas release without IDLH potential	Gas release that triggers alarm with auto shutdowns	Confirmed gas release that triggers HIGH-HIGH alarm WITHOUT auto-shutdown	Gas release into ambient or environment with IDLH potential (includes oxygen displacement)
				Non-Inert gas release into ambient or environment with the potential to exceed PEL/TLV.	
	Chemical Release excluding potable water	Nonhazardous release without manufacturing impact and/or infrastructure damage.	Nonhazardous release with manufacturing impact and/or infrastructure damage.	Toxic, flammable, combustible, or corrosive (pH ≤4 or ≥9) spill that cannot be cleaned up and area restored/recovered to pre-incident condition in <1 hour by 1 person.	Chemical release of any volume resulting in a vapor cloud, toxic, or flammable atmosphere within a building
			A toxic, flammable/combustible, or corrosive (pH ≤4 or ≥9) spill that can be cleaned up and the area restored/recovered to pre-incident condition in <1 hour by 1 person.		
			Chemical release of any volume that leaves the building (refer to Environmental Operations tables)		
	Environment Operations	Regulatory Compliance	No regulatory impacts as release to environment is within allowable limits/ quantity	Notification to the competent agency is required	Any release into the environment that requires regulatory or AHJ notification
Release to environment is contained within site			Release contained within the site boundary, with short-term effects	Any release into the environment that leaves the property (unauthorized or above limits)	Significant release to air/water/soil with immediate visible effects beyond the site boundary
Any abatement/ treatment system issues that do not cause regulatory limits/ quantity exceedance				Any Notice of Violations that was enforced by regulatory agency or AHJ due to unauthorized or above limit release to the environment	Actual/visible impact to water bodies, flora, and fauna (terrestrial or aquatic/marine)
Any release to the environment with no requirement to notify local authorities				Any Notice of Violations that is enforced by regulatory agency or AJH due to unauthorized or above limit release to the environment	Potential long-term impact with mandatory remediation plan
				Potential public impact with or without media exposure	

Appendix 2: Enlarged IMS Business process flow

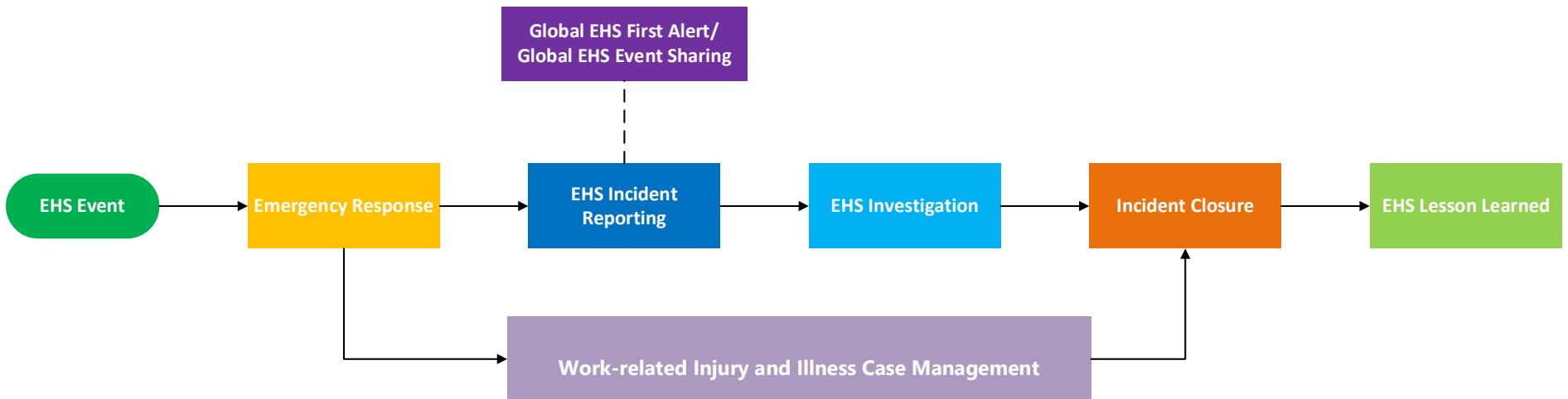
1. EHS Event Process flow



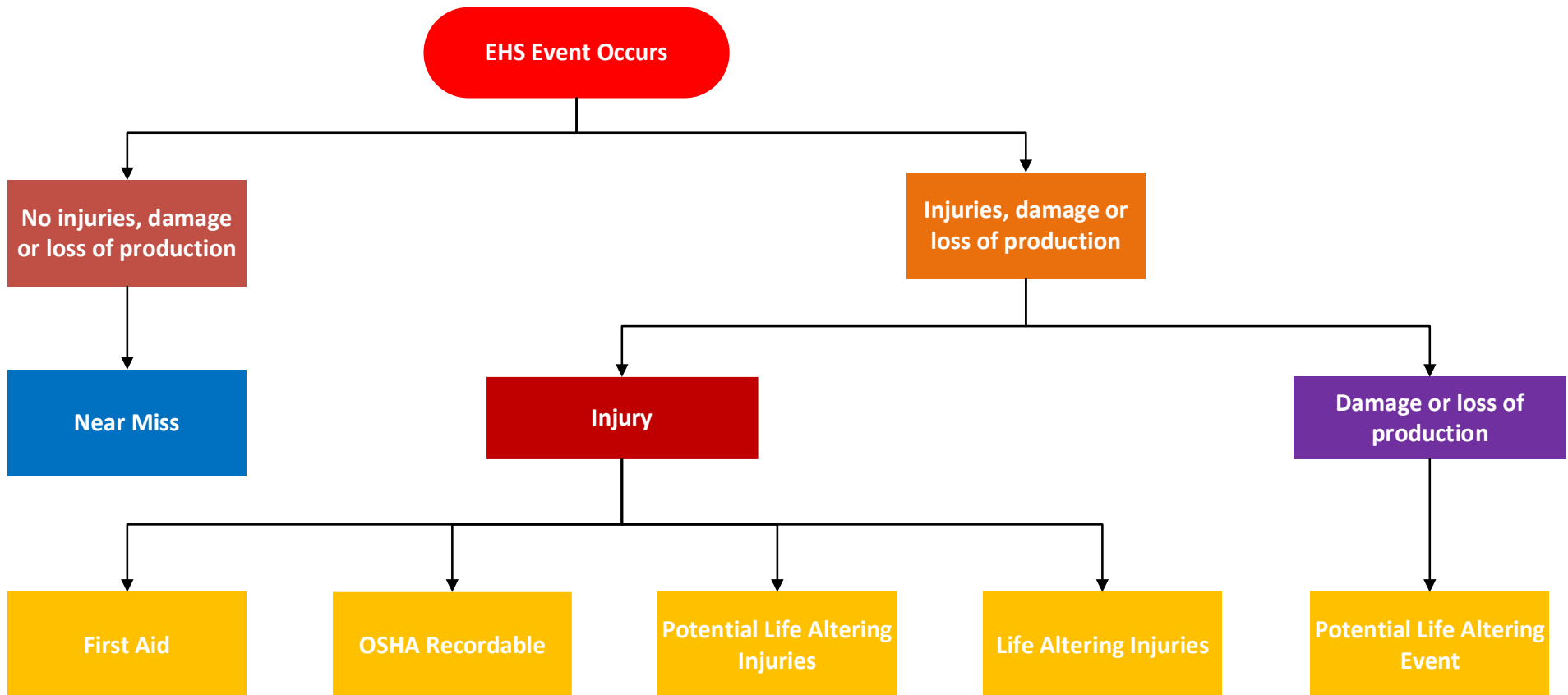
2. Good Catch Business Process



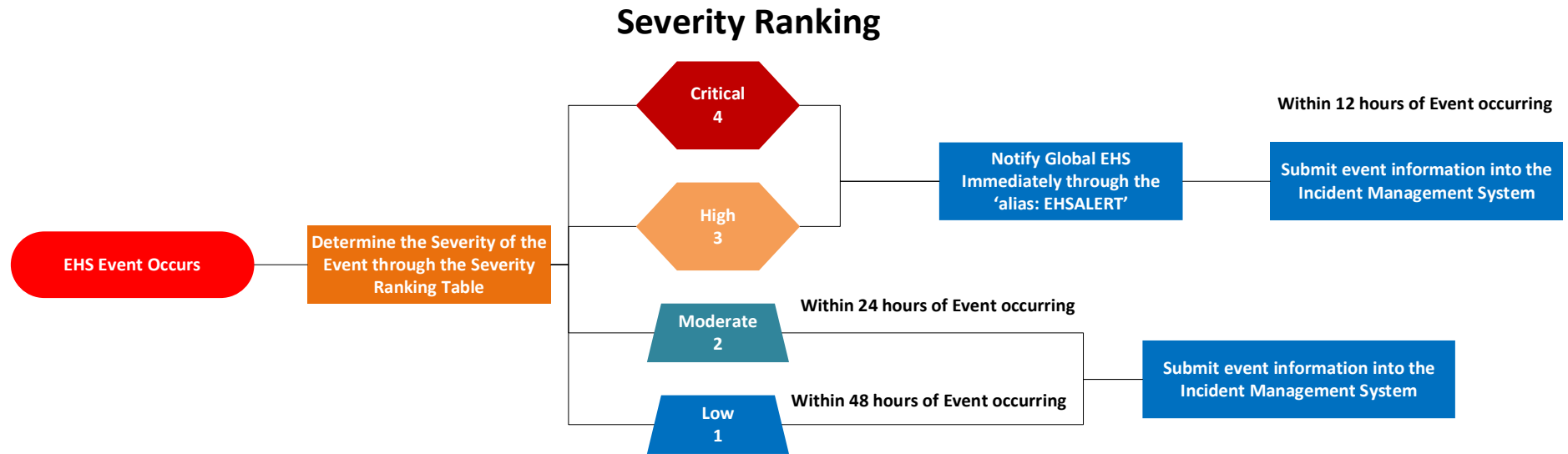
3. Incident Management Business Process



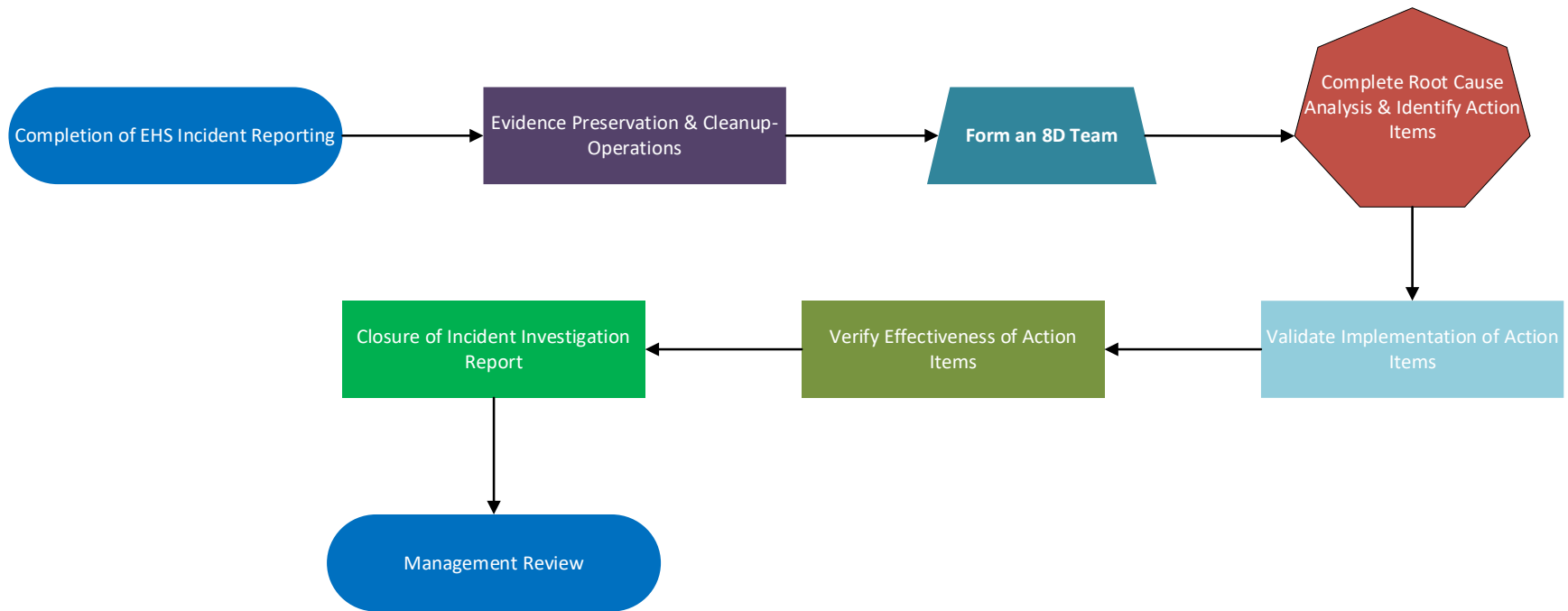
4. Classification of Injuries



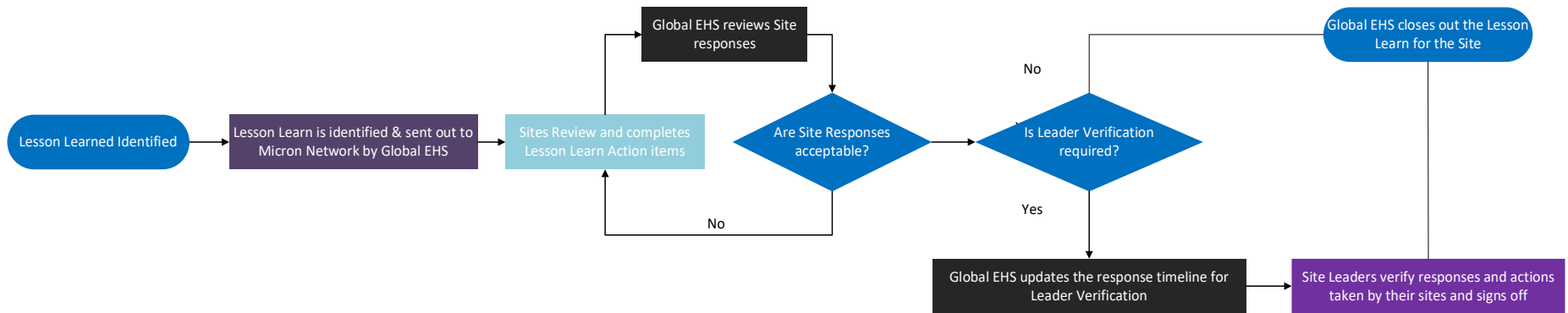
5. Incident Reporting Business Process



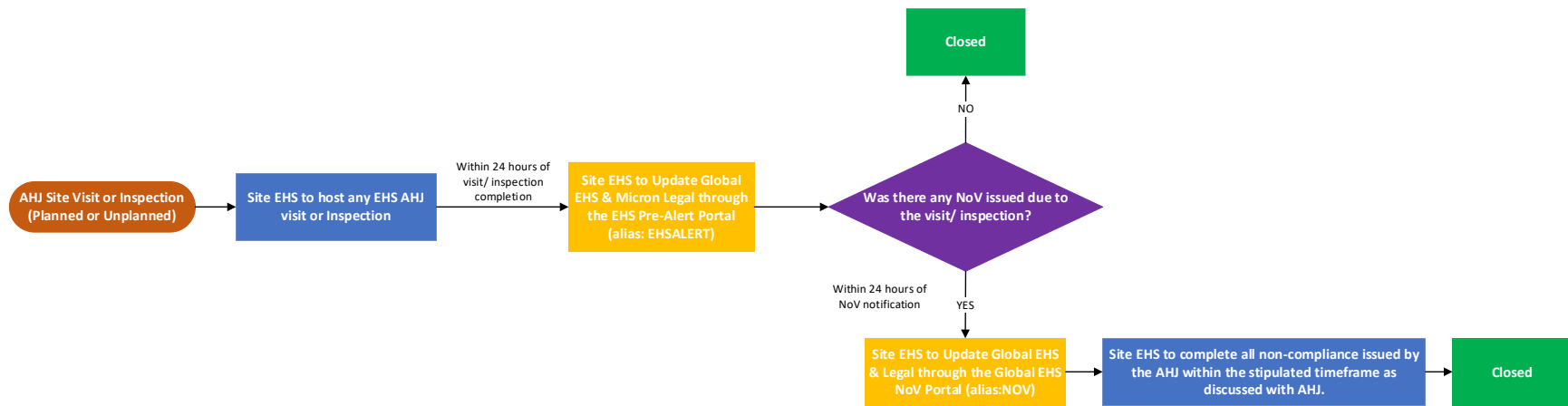
6. Incident Investigation Business Process



7. Global EHS Lesson Learn Business Process



8. AHJ & NOV Business Process



End of Document
