



Document Title: Element 14 – Actions, Handling of Incidents and Nonconformities		Document Identifier: 126626707
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1. PURPOSE

The Mosaic Actions, Handling of Incidents and Nonconformities Element establishes the minimum requirements for the reporting and investigation of incidents by taking necessary and appropriate action to address the cause of the incident or nonconformity.

2. SCOPE

The requirements of the MMS apply to all of Mosaic with limited exceptions of mergers and acquisitions that are not yet operated by Mosaic.

3. ROLES AND RESPONSIBILITIES

3.1. EHS Services

- 3.1.1.** Provide and update the Environment, Health, and Safety (EHS) online platform for managing incidents, including the investigation and the corrective actions.
- 3.1.2.** Develop and maintain a EHS Incident Management Program.
- 3.1.3.** Provide guidance for the process to implement appropriate disciplinary action in the event of knowing violations to EHS programs, policies, rules, regulations, procedures or training.
- 3.1.4.** Ensure that the online reporting software supports all requirements of this element.

3.2. Business Unit

- 3.2.1.** Ensure the corrective and preventive actions are tracked to completion in the EHS online platform and maintained with up-to-date progress.
- 3.2.2.** Ensure completed CAPAs are reviewed for effectiveness according to the Incident Management Program.

3.3. Site

- 3.3.1.** Ensure there is appropriate representation on incident investigation teams.
- 3.3.2.** Maintain the corrective and preventive actions tracker with up-to-date progress.
- 3.3.3.** Provide trained and qualified workers to support Root Cause Analyses (RCAs) and other investigations.
- 3.3.4.** Assign individuals from the site to assume overall responsibility for managing site implementation and compliance with this Element as Element Sponsor and Element Owner.

3.4. Element Sponsor

- 3.4.1.** Champion the implementation, maturity, and improvement of this Element at the site-level.
- 3.4.2.** Monitor corrective and preventive action and incident investigation systems.
- 3.4.3.** Address resolution of identified issues and resource needs.
- 3.4.4.** Ensure integration of corrective and preventive action requirements into site objectives.
- 3.4.5.** Communicate to the organization on program performance, resource requirements, and operational impacts.

3.5. Element Owner

- 3.5.1.** Facilitate the integration of the element requirements into operations and business practices.

- 3.5.2. Establish, communicate, and monitor the corrective and preventive action system implementation.
- 3.5.3. Monitor prioritization and resourcing of identified corrective actions.
- 3.5.4. Assess and monitor the status of corrective and preventive actions.
- 3.5.5. Ensure a quality process is developed for reviewing corrective and preventive actions.

3.6. Workers

- 3.6.1. Report all incidents or events immediately to their direct supervisor, EHS personnel, or the General Manager/Site Leader.
- 3.6.2. Assist in completing incident investigations as directed.
- 3.6.3. Provide feedback on corrective and preventive actions as needed.

4. SITE REQUIREMENTS

4.1. Handling of Incidents and Investigations

- 4.1.1. Sites shall implement the process for reporting all EHS incidents or events immediately, including:
 - Injuries;
 - Environmental incidents;
 - Property damage or loss;
 - Security concerns;
 - Near misses;
 - Government/Agency visits;
 - Community complaints; and
 - Non-conformance events.
- 4.1.2. Workers must report incidents immediately to their direct supervisor, EHS personnel, or the General Manager/Site Leader and visitors for the person responsible for the visit.
- 4.1.3. Leadership shall empower workers and provide necessary resources to report incidents.
- 4.1.4. Compliance with the EHS Incident Management Program is required for determining the incident tier, executing notifications, conducting investigations, applying corrective and preventive actions, evaluating effectiveness, and issuing final notifications. The information must be documented and maintained on the EHS online platform.
- 4.1.5. Findings and insights from incidents and investigations shall be communicated to the organization for the purposes of knowledge sharing and continual improvement.

4.2. Preventive Actions and Addressing Nonconformities

- 4.2.1. There must be a process to identify and manage corrective and actions for the nonconformities and opportunities identified in the EHS Audit and Assurance Program.
- 4.2.2. The preventive and corrective actions must include at minimum:
 - Details of the proposed corrective and preventive action;
 - Responsible party for completing the corrective and preventive action; and
 - Timeline for completion.
- 4.2.3. The EHS online platform must be used to manage the preventive and corrective actions.
- 4.2.4. Business Unit (BU) and Site Management shall assign responsibility, prioritize actions and allocate necessary resources for completion corrective and preventive actions. Consider if the issue, opportunity, or nonconformity is isolated, systemic, or is a compliance issue.
- 4.2.5. Site Management shall request feedback from workers and other relevant stakeholders on corrective actions to eliminate the root cause of the incident or nonconformity.

- 4.2.6. Sites shall manage corrective and preventive actions with routine updates and reviews of progress.
- 4.2.7. Completed corrective and preventive actions shall be reviewed, when applicable, to verify their effectiveness at addressing the identified issue or root cause and preventing recurrence.
- 4.2.8. Findings and insights from completed and effective corrective and preventive actions shall be communicated to the organization for the purposes of knowledge sharing and continual improvement.
- 4.2.9. EHS risks shall be reviewed, and the Risk Register updated to reflect the corrective actions implemented. Where corrective and/or preventive actions identify new or changed hazards or the need for new or changed controls, the procedure shall require that the proposed actions be taken through a risk assessment prior to implementation, as per E10 – Management of Change.

5. TRAINING

All employees will receive training on preventive actions, handling of incidents, and nonconformities as appropriate to their duties/tasks. Refresher training will be provided in the event the Preventive Actions, Handling of Incidents, and Nonconformities Element is modified or otherwise revised. Identify and train appropriate personnel in incident investigation and root cause analysis processes.

6. REVIEW

The Preventive Actions, Handling of Incidents, and Nonconformities Element will be reviewed at least every three years by EHS Services and updated as needed. Appropriate communication will occur, as needed, to ensure that all employees and contractors are aware of the changes.

7. REFERENCES

- EHS Incident Management Program
- EHS Accountability Program
- Element 8 – Document and Record Control
- Element 10 – Management of Change
- BU Disciplinary Action Programs

8. DOCUMENT CONTROL

All MMS documents will be controlled in the Mosaic document management system. Any printed documents must be date stamped with the date printed to monitor that the most current version is reviewed.

All documents and records must be retained per the requirements of Element 8 - Document and Record Control and local retention schedules.

The following corrective and preventive action records must be documented and maintained:

- Results of all investigations into non-conformance including the date and location of the investigation, names of investigators, root and contributing causes and recommendations or corrective actions;
- Documentation of all corrective or preventive actions resulting from non-conformance investigations including descriptions of the actions, timelines or deadlines, names of those assigned

to initiate and complete the actions, documentation of action closure and results of follow-up activities to confirm that the intended results were achieved; and

- Records of disciplinary actions taken because of knowing violations to EHS policies, rules, regulations, programs, procedures or training.

9. REVISION HISTORY

Revision Date	Revision Number	Description of Change
August 18, 2023	1.0	Added "Reference Corporate EHS Accountability Program and BU disciplinary action programs." to 4.2.10. Added a reference to "BU disciplinary action programs" to the References section.
April 1, 2024	2.0	Changed "Preventative" to "Preventive" throughout entire document 3.1.2. Changed "EHS Incidents Handling Program" to "EHS Incident Management Program" 3.6.1. Added "to their direct supervisor, EHS personnel, or the General Manager/Site Leader" 4.1.2. Changed for "workers must immediately direct supervisor, EHS personnel, or the General Manager/Site Leader and visitors for the person responsible for the visit" 4.1.4. Requirement fully reviewed to align with the EHS Incident Management Program. 4.2.11. Removed "where root or contributing causes identify personal issues" 6. Review changed from "yearly" to "at least every three years" 7. References Section – changed "EHS Incidents Handling Program" to "EHS Incident Management Program"
April 1, 2025	3.0	3.1.2 Remove "Handling" 3.1.4. Add "Ensure that the online reporting software supports all requirements of this element." 3.2.2. Add "according to the Incident Management Program." 4.1.4 Remove "Compliance with the EHS Incident Management Program is required for determining the incident tier, executing notifications, conducting investigations, applying corrective and preventive actions, evaluating effectiveness, and issuing final notifications. The information must be documented and maintained on the EHS online platform." 4.2.10. Remove "The organization shall establish a program to implement appropriate disciplinary action in the event of

		knowing violations to EHS policies, rules, regulations, programs, procedures, or training. Reference EHS Accountability Program and BU disciplinary action programs.” 4.2.11, 4.2.12. Remove (and move to element 2 “Sites shall follow established business unit disciplinary processes to ensure appropriate accountability is included in corrective action development in accordance with the EHS Accountability Program. Discipline should be designed with the intent to address root causes. The program must include the following elements...” 5 Change “affected” to “appropriate”
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