

Major Accident Prevention Policy (MAPP)

Corden Pharma Bergamo S.p.A. recognizes the prevention of major accidents involving hazardous substances and complex chemical processes as a primary objective. This objective is pursued through a consistent commitment to preventing major accidents and mitigating their potential consequences.

This Policy forms an integral part of the MAPP Policy Document and is adopted to ensure the protection of workers, contractors, the surrounding population, and the environment, in accordance with Annex B of Legislative Decree 105/2015.

Management acknowledges that certain activities involve major accident hazards and considers the following elements essential:

- a thorough understanding of all activities and processes;
- the systematic identification and assessment of hazards and potential incident scenarios;
- the adoption of appropriate prevention and protection measures;
- the training and qualification of personnel;
- procedures and technical measures capable of preventing emergencies and managing them when necessary.

Accordingly, the Management develops, issues, reviews, and implements initiatives, programs, and procedures aimed at maintaining and continuously improving the safety of the establishment.

Through these actions, Corden Pharma Bergamo S.p.A. promotes a structured and integrated approach to managing major accident risks, ensuring a high level of protection for people and the environment, and maintaining compliance with all applicable legislative and regulatory requirements.

This Policy represents the Operator's formal commitment to maintaining an effective, transparent, and continuously improving Safety Management System.

To support these commitments, the site has implemented an Integrated Management System compliant with ISO 14001, ISO 45001, ISO 50001, and ISO 22301, ensuring the systematic application of this Policy.

MANAGEMENT COMMITMENTS

To ensure the prevention of major accidents and the mitigation of their consequences, Management commits to:

1. **Regulatory Compliance** – fully complying with the requirements of Legislative Decree 105/2015 and all current and future regulations on major accident prevention.
2. **Hazard Identification and Assessment** – systematically identifying hazardous substances, processes, and risk-prone activities, and assessing potential incident scenarios and their consequences.
3. **Risk Reduction** – implementing technical and managerial measures to eliminate hazards or reduce residual risks, in line with the state of the art and the principles of continuous improvement.
4. **Anomaly and Emergency Management** – identifying and analysing abnormal operating conditions and emergencies, preparing and periodically testing internal emergency plans in coordination with the Authorities and external plans.
5. **Plant Safety** – designing, constructing, operating, and maintaining equipment in safe conditions, including the structured management of change and related activities.
6. **Improvement of the SGS-MAPP** – developing and updating safety programmes and procedures, regularly verifying their effectiveness, and integrating lessons learned from incidents and near-misses.
7. **Communication and Transparency** – ensuring clear, complete, and timely communication to the Authorities and the public, strengthening trust in the safety management of the site.
8. **Personnel Involvement** – consulting and engaging the Workers' Safety Representative and all personnel, ensuring targeted training and qualification on major accident hazards.
9. **Supplier and Contractor Management** – informing and training suppliers and contractors so that they operate in full alignment with the principles of this Policy.
10. **Resources and Monitoring** – allocating the necessary resources, monitoring through audits and performance indicators, and periodically reviewing the effectiveness of the system.

Review

This Policy is reviewed by the Management at least once per year to verify its effectiveness and alignment with major accident prevention objectives.

The Policy is also documented, implemented, and updated at least every two years, or whenever regulatory, organisational, plant or process changes occur, as well as following incidents or other significant events.

This Policy is communicated to all personnel, shared with external contractors, made available to Authorities, and posted in work areas and site access points to ensure it is known by all internal and external stakeholders.

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Il Gestore

(Luca Porcu)

CordenPharma Bergamo

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