

Process Safety Management Policy

At Cohance Lifesciences, process safety is a core business value. We protect our people, contractors, communities, environment, and assets by implementing a robust PSM system aligned with CCPS, applicable Indian regulations, and industry best practices.

- ❖ **Employee Participation** – We commit to involving employees in Trainings, PHAs, walkdowns, near-miss reporting, incident investigations, audits, and improvement actions. We foster a culture where everyone has the authority to stop unsafe work.
- ❖ **Process Safety Information (PSI)** – We maintain complete and up-to-date chemical, process, and equipment information—including P&IDs, PFDs, safety data, relief system design, interlocks, and equipment specs—to support safe operation and decision-making.
- ❖ **Process Hazard Analysis (PHA)** – We conduct risk assessments (HAZOP, What-If, FMEA, and LOPA) for new, existing, and modified processes/facilities. Risk-based recommendations are tracked to closure, and PHAs are periodically revalidated across all Cohance locations.
- ❖ **Operating Procedures** – We develop, maintain, and follow clear, safe, and accessible operating instructions for normal, startup, shutdown, and emergency conditions.
- ❖ **Training** – We provide role-specific process safety trainings to employees and contractors to ensure competency.
- ❖ **Contractors** – We screen, train, and monitor contractors to ensure they meet our PSM and safety expectations. High-risk jobs follow strict controls, and contractor performance is regularly evaluated.
- ❖ **Pre-Startup Safety Review (PSSR)** – Before starting any new or modified process or equipment, we verify readiness through PSSR—ensuring engineering controls, trainings, documents, interlocks, relief systems, and safety devices are in place and functional.
- ❖ **Mechanical Integrity (MI)** – We inspect, test, calibrate, and maintain critical equipment—reactors, dryers, columns, PSVs, scrubbers, pumps, gas detectors, inerting systems, electrical installations, etc.—to prevent failure and ensure safe performance.
- ❖ **Hot Work Permits** – We control all hot work using a formal permit system with gas testing, isolations, fire watch, area preparation, and post-completion checks in all areas.
- ❖ **Management of Change (MOC)** – We ensure that any change—process, equipment, instrumentation, materials, software, or people—is reviewed, analyzed for risk, authorized, documented, and communicated before implementation.
- ❖ **Incident Investigation** – We investigate all incidents and near misses promptly using root cause analysis. Corrective and preventive actions are implemented across sites, and learnings are shared to avoid recurrence.
- ❖ **Emergency Planning and Response** – We maintain site-specific emergency response plans for fire, explosion, toxic release, and solvent spills. Regular drills, trained ERTs, and emergency equipment readiness ensure preparedness.
- ❖ **Compliance Audits** – We conduct periodic PSM audits, statutory inspections, and internal compliance checks. Audit findings are risk-ranked and addressed through time-bound CAPA to ensure continuous improvement.
- ❖ **Trade Secrets** – We provide necessary safety information to employees and contractors while safeguarding proprietary process, formulation, and technology data through controlled disclosure mechanisms.

Leadership Role:

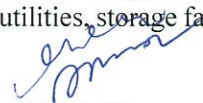
- ❖ Provide resources, training, and authority to meet PSM objectives.
- ❖ We will monitor process safety performance and review the overall PSM status in management review meetings at least quarterly.

Continuous Improvement:

- ❖ We will set measurable PSM goals, track progress, and adapt to new hazards, technology, and regulatory changes. This policy applies to all manufacturing sites, laboratories, pilot plants, utilities, storage facilities, and outsourced operations where hazardous chemicals and processes are present.

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