

Life Healthcare #29199, Environmental and Social Action Plan (ESAP), May 10, 2010			
Item	Action	Completion Indicator	Timetable
Life Healthcare Group Holding (Proprietary) Limited will maintain a management system which meets IFC's Performance Standards and report any breaches of the IFC Performance Standards together with a corrective action plan. The specific actions in this environmental and social action plan (ESAP) refer to the Company's international expansion operations.			
PS1: Social and Environmental Assessment and Management Systems			
1	a) For construction of new developments, submission of environmental impact studies, all applicable licences and permits legally required to commence operations. b) Once new developments are operational, existing QMS, organizational capacity and reporting structures to be applied to operations.	a) Submission to IFC of relevant documentation, agreed action plan to ensure compliance with IFC Performance Standards and EHS Guidelines. b) Internal quality review demonstrating application of existing QMS to new development.	a) Prior to construction. b) Within six months of operations or a period otherwise pre-agreed with IFC.
2	a) For acquisition of existing developments / operations, submission of due diligence on management systems and environmental and social performance. b) Existing QMS, organizational capacity and reporting structures to be applied to acquisitions.	a) Submission of relevant documentation, agreed action plan to ensure compliance with IFC Performance Standards and EHS Guidelines. b) Internal quality review demonstrating application of existing QMS to acquisition.	a) Prior to acquisition / management of operations. b) Within six months of operation or a period otherwise pre-agreed with IFC.
3	a) PPP-specific QMS, related organizational capacity and applicable reporting structures to be applied to all existing PPPs. b) PPP-specific QMS, related organizational capacity and applicable reporting structures to be applied to all new PPPs.	a) Documentation e.g., policies, procedures, demonstrating application of QMS at existing PPPs. b) Documentation e.g., policies, procedures, demonstrating application of QMS at new PPPs.	a) Receipt of existing QMS documentation as applicable to PPP's within six months of IFC's initial investment or a period otherwise pre-agreed with IFC b) Within six months of operations or a

			period otherwise pre-agreed with IFC.
4	a) Develop and implement a community grievance mechanism scaled to the risks or adverse impacts on affected communities at the Group and individual hospital level, including the PPPs and where applicable for new construction, in accordance with the requirements of IFC's PS's.	a) Documented evidence confirming existence of the grievance mechanism at the Group and individual facility level.	a) Within six months of IFC's initial investment or a period otherwise pre-agreed with IFC.
PS 2: Labour and Working Conditions			
5	If new operations are to begin in countries outside of South Africa, the company will review host nation labour law to ensure it meets the requirements of local labour law or requirements under PS 2.	Submit labour law review to IFC and agreed action plan to ensure compliance with South African labor law, or PS 2.	After identification of each target for acquisition and prior to management of operations.
6	Compliance with labour law requirements as determined under item 5.	Submit evidence of labour law being incorporated into operations, e.g., example employment contract.	Six months from IFC initial investment or a period otherwise pre-agreed with IFC
PS 3: Pollution Prevention and Abatement			
7	If new operations are to begin in countries outside of South Africa, the company will: a) Review host nation EH&S laws to ensure they meet the legal requirements or requirements under PS 3. b) Develop a Health Care Waste Management Plan (HCWMP), or its equivalent in the QMS, to manage both hazardous and non-hazardous waste streams that will meet the more stringent of national laws and regulations and IFC's PS requirements including those of the EHS Guidelines.	a) Submit evidence of EHS review to IFC such as a "legal and other requirements" register showing applicability of either host nation EHS laws/regulations or requirements under PS 3 to scope of operations. If applicable, agree with IFC on an action plan so as to comply with QMS or PS 3 requirements. b) Submit copy of HCWMP, or its equivalent in the QMS.	a) After identification of each target for acquisition and prior to beginning of operations. b) After identification of each target for acquisition and prior to beginning of operations.
8	Provide IFC with summary data on electricity consumption.	Group-wide summary data on electricity consumption.	Three months from IFC initial investment or a

			period otherwise pre-agreed with IFC
PS 4: Community Health, Safety and Security			
9	Life and Fire Safety (L&FS) System Design. a) Engage professional services of a qualified Life and Fire Safety Engineer acceptable to IFC to design/review a Life and Fire Safety Master Plan (engineering design) for hospitals to be constructed, or those that are existing that will be acquired, by LHC. Life and fire safety design shall be responsive to one internationally recognized life safety code (e.g. South Africa) and the host nation life and fire safety code. The design shall comply with the Life and Fire Safety requirements of the IFC General EHS Guideline. b) Conduct post-construction inspections to verify that the L & FS system was built/installed as designed. If not built/installed as designed, develop an upgrade list/action plan to ensure system will meet appropriate requirements. Conduct post-upgrade list/action plan construction inspection to verify that the L & FS system was built/installed as designed.	a) Provide IFC with signed contract for professional services to perform Life and Fire Safety system design/review. b) Provide IFC with the post construction inspection and certification of as-built L&FS system	a) Prior to construction; b) inspection indicating acceptance of L&FS system as-built submitted prior to operations
PS 5: Land Acquisition and Involuntary Resettlement			
10	Land Acquisition will be assessed against PS 5 prior to any acquisition and results of the assessment submitted to IFC.	Completed assessment of potential acquisition.	When available and prior to each acquisition.