

APMG - (Project # 31454)

ENVIRONMENTAL AND SOCIAL ACTION PLAN dated 22nd November 2011

#	Action	Deliverable	Deadline
PS1: Social and Environmental Assessment and Management Systems			
1	APMG will prepare and implement a management system aligned to JCI requirements and encompassing social, occupational health and safety ("OHS"), human resources and environmental affairs for all its operations. The Social and Environmental Management System ("SEMS") shall reference IFC performance standards, and applicable requirements of the EHS General and Healthcare guidelines, taking note of the need for each individual hospital and clinic to comply with the local regulations. The SEMS will also specify operating policy requirements as well as basic procedures that must be in place for quality control and compliance during construction/renovation and operation of all clinics and hospitals. APMG will implement a formal system for monitoring and reporting social and environmental issues to senior management and for reporting back to IFC. At a minimum the SEMS will incorporate policies and procedures, compliant with PS1 to 8, on the following: • Environmental and social assessment of new developments; • One Company HR policy, terms and conditions and working conditions, including non-discrimination, equal opportunity, minimum age of employment, to comply with PS2; • OHS risk management, accident reporting and OHS training; • Procedures for ensuring services provided by JV partners and contractors, including waste storage and effluent treatment, meet an agreed standard of service; • Emergency prevention, planning and response ; • Management of hazardous materials and liquid and solid waste; • Green procurement and resource conservation; • Formal system for community engagement and grievance mechanism, clearly communicated at each site and on APMG's website; • Life and fire safety ("L&FS") requirements (see action 5) in line with an international fire code; • Seismic hazard assessment in line with the International Building Code • Infection control; • Future land acquisition; • Regular reporting to management, JV partners and investors.	(i) Draft SEMS with operating policy requirements and basic procedures. (ii) Final approved SEMS.	(i) Equity Commitment + 4 months (ii) Equity Commitment + 12 months
2	Identify E&S managerial, reporting and monitoring responsibilities at Company management team level and hospital/clinic level, to include human resources, OHS, radiological safety, waste management and effluent treatment, infection control, emergency preparedness and prevention, and life and fire safety responsibilities. Undertake necessary training.	(i) Outline of E&S organizational structure with roles and responsibilities and training plan	(i) Condition of Equity Disbursement

PS2: Labor and Working Conditions			
3	Ensure adequate E&S oversight and management on construction sites. This will include: (i) Inclusion of environmental, social and occupational health and safety requirements in bids and contract documentation, including a requirement to develop a site safety manual and undertake safety site toolbox talks. (ii) Community grievance mechanisms, including provision of signage with information on the onsite emergency plan and reporting system as well as contact details of staff able to respond to questions, concerns and grievances by the nearby communities.	(i) Copy of contractual language stipulating E&S obligations of contractors; (ii) Photographs of signage.	(i) Prior to tendering construction contract (ii) At start of construction
PS3: Pollution Prevention and Abatement			
4	(i) Send to IFC an effluent monitoring program for all hospitals and clinics in line with applicable requirements of the IFC's EHS General and Healthcare guidelines. (ii) Implement the agreed monitoring program and on the basis of the monitoring results, agree with IFC a corrective action plan and timetable for implementation, if required. (iii) Implement recommendations according to the timetable agreed at 4.(ii)	(i) Monitoring program (ii) Monitoring results, Corrective Action Plan and implementation timetable (iii) As agreed based on (ii)	(i) Condition of Equity Disbursement (ii) Equity Disbursement + 4 months or Condition of First Loan Disbursement, whichever is earlier. (iii) As agreed with IFC
PS4: Community Health, Safety and Security			
5	Life and Fire Safety: For all existing hospitals and clinics in China, contract a competent professional to: (i) Conduct L&FS audit against an international L&FS standard. (ii) On the basis of the recommendations, agree with IFC on a mutually acceptable time frame for implementing these. (iii) Implement recommendations according to the timetable agreed at 5(ii). For new (leased and new build) hospitals and clinics: (iv) Prepare preliminary drawings and specifications that comply with an internationally accepted L&FS standard eg. USNFPA and provide to IFC certification that the design of each hospital/clinic is in material compliance with local as well as internationally accepted L&FS standard(s) (v) Provide to IFC certification that the construction of the L&FS systems has been carried out in accordance with the accepted design.	(i) Signed contract with competent profession (ii) Audit report, with time-bound fire safety action plan acceptable to IFC (iii) Completion audit by the competent professional (iv) Drawings and professional opinion stating buildings' compliance with these requirements. (v) Certification	(i) Condition of Equity Disbursement (ii) Equity Disbursement + 2 months (iii) As agreed with IFC (iv) Prior to renovation/ construction of hospital/clinic (v) Prior to opening