Environmental and Labor Issues:

This is a category B project according to the IIC's Environmental and Social Sustainability Policy because it could produce certain effects that may be avoided or mitigated by following generally recognized performance standards, guidelines, or design criteria. The main environmental and labor considerations related to the project are: pollution prevention, workplace and labor conditions, and community health and safety.

Johns Hopkins Medicine International is providing support to CHSDM during its design phase. For its part, Fundación Santa Fe de Bogotá (FSFB) is one of Colombia's most important healthcare institutions. It has been accredited by the Joint Commission International (JCI) and has a consultation and exchange agreement with Johns Hopkins Medicine International. University-related activities at CHSDM will take places under an agreement with Universidad de los Andes. The hospital is designed to meet LEED (Leadership in Energy and Environmental Design) standards.

CHSDM will offer a range of specialties that include orthopedics, cardiology, neurology, oncology, minimally-invasive surgery, gastroenterology, and obstetrics. Of the 151 beds planned for the first stage, 53 will be for intensive care and 98 will be hospital beds. The latter will include 16 beds for pediatrics and 18 for obstetrics. The hospital will also offer emergency, catheterization, radiology, and outpatient services, as well as physicians' offices, operating rooms, and delivery rooms. The hospital is expected to open its doors in 2016. The full project will provide 410 beds once all three stages are complete.

Environmental and Safety Standards. CHSDM will employ environmental and social management practices similar to those used by FSFB in its hospital. These are recognized practices that comply with domestic legislation and international standards. The company has submitted an environmental management plan to the Corporación Autónoma Regional del Canal del Dique (CARDIQUE) describing the expected environmental impact and the mitigation measures to be adopted. During construction, the technical supervisor will be responsible for overseeing the implementation of environmental and workplace safety requirements. During the operational phase, the organizational structure of the FSFB will be replicated. This structure includes an environmental coordinator, occupational health coordinator, a safety coordinator, a human resources director, and an infrastructure director to coordinate environmental and safety issues with all the divisions. The enterprise will implement a training plan to upgrade the skills of its personnel to meet domestic and international standards.

Liquid and solid waste management. There is no public sewage service where the project is to be built. CHSDM will build a wastewater treatment plant that must meet all environmental standards of the World Bank Group. The discharge location for the treated wastewater has yet to be determined, and final implementation will be subject to the approval of the multilateral financial entities involved in this operation.

CHSDM will implement a comprehensive medical waste management plan similar to that of FSFB. The plan establishes the procedures for identifying, separating, temporarily and permanently storing, treating, collecting, transporting, and disposing of the waste pursuant to the regulations established by Colombia's Environment and Sustainable Development and Health and Social Protection ministries. Service providers with good reputations will be chosen and their operations audited.

Hazardous materials. A number of hazardous materials will be handled at the hospital, including chemical reagents, solvents, drugs, medicinal gases and anesthetics, and radioactive laboratory material. Only trained personnel will handle hazardous materials, and they will be provided with the

safety facilities, information, and personal safety equipment they are required to have by law.

Labor and social practices. The CHSDM will adopt the procedures established by FSFB, which has internal workplace rules and regulations on human resources and working conditions that cover working hours, compensation, breaks, rules of conduct, minimum age requirements, and non-discrimination labor policies, among other things. All employees receive a copy of the rules and regulations with their work contracts, and they go through an orientation process prior to beginning work. CHSDM will employ an estimated 350 people directly and indirectly when it begins operations.

CHSDM must comply with all domestic labor laws, just as FSFB does. The main labor laws that apply and that CHSDM will be expected to follow include social security contributions; freedom to associate and organize a labor union; the prohibition of forced labor and the elimination of exploitation and abuse of child labor; and nondiscrimination in the workplace. FSFB employees are not affiliated with any union. Under Colombian law, the hospital must have a committee made up of representatives of the company and workers to deal with work-related grievances and demands. Employees have direct access to supervisors and the human resources office should they have any grievances.

Occupational health and safety and emergency response. CHSDM's design adheres to all Colombian earthquake and fire codes. The safety requirements are in line with those of the JCI and the U.S. National Fire Protection Association (NFPA). The project also calls for an expert evaluation prior the hospital's commissioning to verify compliance with the project plan. Advisors will also verify the safety of radio imaging equipment.

The hospital will implement emergency response plans that include mechanisms for communicating with affected communities. All employees will receive training, especially those who are members of safety brigades. Safety monitoring and audits of the firefighting systems will also be part of regular monitoring performed as part of managing the new hospital.

An occupational health and safety program will also be implemented that complies with local legislation and industry best practices such as those recommended by JCI to prevent biological risks (hospital infections, wounds caused by needles and scalpels, etc.) and accidents while handling drugs, chemicals, and ionizing radiation, as well as other risks inherent to the practice of medicine. Like FSFB, CHSDM will implement a joint occupational health committee (COPASO, in its Spanish acronym) that meets bimonthly to identify occupational health risks, propose improvements, and follow up on those proposals, as well as investigate accidents and recommend training programs.

Monitoring and reporting. CHSDM will prepare an Environmental and Social Action Plan (ESAP) satisfactory to the IIC to ensure compliance with domestic regulations and the IIC's environmental and workplace safety and health guidelines. Among other things, the ESAP will include the implementation of environmental and safety procedures and operations and human resources management practices following FSFB standards. It will also verify the safety of the firefighting systems and the safe use of radiation, as well as submit a design for a wastewater treatment plant meets IFC standards. It shall also produce an annual progress report.