

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 involve pollution prevention, labor and working conditions, and community health and safety.

The range of services offered includes imaging using ionizing radiation (i.e., x-rays, tomograms, mammograms, and angiograms), ultrasound (i.e., sonograms and echocardiograms), guided percutaneous procedures, hemodynamic monitoring, gastroenterological studies, magnetic resonance imaging, and endovascular surgery. Prodiagnóstico also provides other services to specialized institutions, such as intensive care units and clinical analysis laboratories.

Water Supply and Liquid Waste Management: Prodiagnóstico facilities receive their water supply through their host health centers, which are in turn supplied by municipal water networks. With respect to the municipalities of Medellín and Bello, both located in the Aburrá Valley, Empresas Públicas de Medellín—a public utilities company—provides drinking water and sewerage services. Any non-hazardous liquid waste that can be safely treated along with domestic wastewater is discharged into the sewerage system, whereas liquid waste posing a biological risk is treated as medical waste.

Medical Waste Management: Prodiagnóstico's integrated management plan for medical waste specifies how this waste should be identified, separated, stored (initially and long term), treated, collected, transported, and disposed of, pursuant to the pertinent regulations of Colombia's Ministries of the Environment and Sustainable Development, and Health and Social Protection. The plan applies to all individuals associated with the delivery of Prodiagnóstico services, whether employees, contractors, patients, or visitors.

The plan underscores the importance of the category of waste generated. Waste is classified as either hazardous or non-hazardous. The former category covers waste that poses a biological risk (e.g., biohazard, pathology, and sharps), chemical risk (e.g., medicine and pharmaceutical products, cytotoxic agents, heavy metals, and reagents) or radioactive risk, while the latter includes biodegradable, recyclable, and general waste. The treatment waste receives depends on its classification. Accordingly, hazardous waste is disposed of by licensed operators. All Prodiagnóstico's imaging studies are processed digitally, thus eliminating the need for photographic processing chemicals and reducing pollution caused by chemical reagents and imaging-related waste, while at the same time facilitating remote communication. Currently, Prodiagnóstico does not produce radioactive waste, as it does not use technology that generates this type of waste.

Labor and Social Practices: Prodiagnóstico's internal work rules (Reglamento Interno de Trabajo) form an integral part of the employment contracts with its employees, both permanent and temporary, as well as apprentices from technical institutes, universities, or the Colombian National Apprenticeship Service (SENA). These rules cover, inter alia, working hours, shifts, breaks, forms of remuneration, behavioral standards, and sanctions for noncompliance.

Prodiagnóstico complies with Colombian labor legislation. Core mandatory labor standards include legally-mandated benefits, freedom of association to form labor unions, prohibition of forced labor and child labor, and nondiscrimination in the workplace. Prodiagnóstico employees are not affiliated with any union. The company's grievance committee, comprised of two company and employee representatives, respectively, arbitrates work-related claims and complaints. Prodiagnóstico does not employ anyone less than 18 years of age. Nevertheless, young people between 14 and 18 years

of age may participate in certain apprenticeship programs, in which case they are limited to the tasks and working hours stipulated by law.

The company has an employee well-being program in place to improve the quality of life of its employees and their families. The program promotes opportunities for education, housing, personal development, and well-being through financial support, profit-sharing schemes, social activities, events and celebrations, and agreements with other business, sporting, educational, and health organizations. Employees and their immediate family members receive medical coverage from healthcare services providers (entidades prestadores de salud - EPS) through the social security system, and insurance through a workplace risk administrator (administradora de riesgos laborales - ARL).

Occupational Health and Safety and Emergency Response: The company's internal work rules set out its obligation to prevent illnesses and accidents that could befall employees by chance or as a result of their employment, to protect employees from these illnesses and accidents, and to care for them if they suffer any ill effects. In this regard, the company is obliged to provide employees with the necessary resources and training to protect them from these risks. The company's occupational health and safety program consists of identifying, planning, organizing, executing, and evaluating different activities aimed at preserving, maintaining and improving employee health.

The company has identified three priority occupational risk factors:

1. Ionizing radiation;
2. Biosafety; and
3. Ergonomics.

The company has developed a safety procedures manual for each of the above-cited risk factors. In the case of ionizing radiation, the manual establishes the exposure limits for equipment operators, patients, and members of the general public (e.g., pregnant women are not permitted to work with equipment that generates ionizing radiation). It also establishes operating procedures, and mandates the use of protective gear and personal dosimetry devices, measurement of radiation—for verification purposes—both at and in the vicinity of the source, activity logs, and specific training. The biosecurity manual establishes the set of preventive measures aimed at managing occupational risk factors associated with biological, physical, and chemical agents, as well as the procedures to be followed in case of accidents that could expose employees to these risks. The ergonomics manual, which applies to all employees regardless of their position in the company, aims to identify risk factors associated with the musculoskeletal system and reduce the incidence and severity of symptoms associated with disorders resulting from prolonged static postures, repetitive movements, or improper positioning/lifting techniques.

The company's contingency plan covers all areas of its activity, including incidents or accidents that could occur in the context of handling hazardous waste, in addition to other types of accidents, spills, service disruptions, earthquakes, and civil disturbances. The plan envisages the formation of an emergency committee, emergency teams, an evacuation plan, and communications systems. Whenever providing services on the premises of a third party, Prodiagnóstico employees are integrated into the host entity's emergency brigades.

Monitoring and Reporting: Prodiagnóstico will draw up an environmental and social action plan (ESAP) acceptable to the IIC, to ensure compliance with Colombian regulations and IIC environmental and workplace health and safety guidelines. The ESAP will also require the company to submit annual reports with updates on environmental and occupational health and safety parameters.