

## GLOBOGATE Code of Conduct "Fair Recruitment Nursing Germany"

The following code is intended to stand as a foundation for fair and ethical practices in the international recruitment, placement and employment of foreign personnel intended for assignment in the German healthcare system. GLOBOGATE will adhere to this basis and is concerned that all of its business partners will follow this basis.

The Code is fundamentally based on the recognition of the WHO Code of Conduct for the International Recruitment of Health Professionals

([https://www.who.int/hrh/migration/code/WHO\\_global\\_code\\_of\\_practice\\_EN.pdf](https://www.who.int/hrh/migration/code/WHO_global_code_of_practice_EN.pdf)), which - in addition to compliance with the International Convention on Human Rights - is the supreme guideline for cooperation between business partners. In particular, it serves to uphold the right of individuals to migrate and is based on the understanding that the legitimate interests and responsibilities of health professionals, countries of origin and employers in the destination country cannot conflict.

GLOBOGATE and its business partners voluntarily undertake to comply with both the ILO Core Labor Standards (<https://www.ilo.org/berlin/arbeits-und-standards/kernarbeitsnormen/lang--de/index.htm>), in particular the General Principles and Operational Guidelines for Fair Recruitment of the ILO, and the IRIS Standards of the International Organization of Migration (<https://iris.iom.int/sites/g/files/tmzbd1201/files/documents/IRIS%20Standard%20Report%20.pdf>).

From these, the following are the main principles that must be taken into account in the process of recruiting workers from abroad:

- Respect for laws, fundamental principles and rights in the workplace.
- Respect for ethical and professional conduct
- Prohibition of recruitment fees and related costs for foreign workers
- Respect for freedom of movement/freedom of movement of persons
- Respect for transparency regarding employment conditions
- Respect for confidentiality and data protection
- Respect for access to legal remedies

In addition, business partners shall observe that the recruitment and placement process complies with the laws and agreements of all participating countries in which they operate, including relevant labor and immigration laws.

As GLOBOGATE acts on behalf of the clients and implements the service packages with business partners contracted by it, which have subscribed to this Code, it verifies, as far as possible, that the objectives, motivations, contractual obligations, behaviors of all these parties comply with the requirements set forth in this Code.

GLOBOGATE and its business partners strictly follow a "no fee policy" for the foreign employee, respectively an "employer pays" principle.

Furthermore, GLOBOGATE and its business partners confirm the following:

The foreign employees have the right to be recruited for a job in Germany through a process that will be based on a fair, transparent recruitment procedure and an appropriate working environment and recruitment conditions that correspond to the assurances given. Employees have the same rights and obligations as their counterparts in Germany and are responsible for fulfilling their obligations to their recruiter and/or employer.

GLOBOGATE and its business partners acknowledge that countermeasures will be taken against individuals who file a complaint or report a suspected violation of this Code. Employees or other parties who violate this policy will be subject to appropriate disciplinary action by GLOBOGATE and its business partners. This may include (but is not limited to) disclosing the violation to representatives of the authorities, if required by law, agreement or contract, and, if necessary, not entering into or terminating contractual relationships with the party concerned.

GLOBOGATE, Zug

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