

Policy statement on the fair recruitment and placement of nursing staff from abroad

This policy statement applies to the recruitment and placement of nursing staff from abroad for MEDIAN Unternehmensgruppe B.V. & Co. KG (MEDIAN), as well as for all affiliated companies in accordance with Sections 15 et seq. German Stock Corporation Act (AktG).

This statement is published on the MEDIAN website and is, therefore, available for anyone interested to view. Upon request, this statement will be provided to contractual partners and employees in writing.

MEDIAN and all affiliated companies, their senior executives and managing directors are committed to complying with the *WHO Global Code of Practice on the International Recruitment of Health Personnel* and the *WHO health workforce support and safeguards list* (currently 2023; the next publication is expected in 2026).

- The *WHO Global Code of Practice on the International Recruitment of Health Personnel* contains, among other things, provisions on fair, transparent and non-discriminatory recruitment (Art. 3), on protecting the health systems of countries of origin from excessive recruitment of nursing personnel (Art. 3, 5) and fair selection, treatment and remuneration (Art. 4).
- The *WHO health workforce support and safeguards list* specifies in more detail the requirement to refrain from recruiting nursing staff in countries with volatile, strained health systems and contains a list of countries in which recruitment should be avoided in favour of the countries of origin.

Furthermore, MEDIAN and all affiliated companies are committed to the following international agreements in their currently valid versions and the human rights stipulated therein:

- The eight core conventions of the International Labour Organisation: *Convention concerning Forced Labour*, 1930 (No. 29), *Convention concerning Freedom of Association and Protection of the Right to Organise*, 1948 (No. 87), *Convention concerning the Right to Organise and Collective Bargaining*, 1949 (No. 98), *Convention concerning Equal Remuneration*, 1951 (No. 100), *Convention concerning the Abolition of Forced Labour*, 1957 (No. 105), *Convention concerning Discrimination in Respect of Employment and Occupation*, 1958 (No. 111), *Convention concerning the Minimum Age for Admission to Employment*, 1973 (No. 138), *Convention concerning the Elimination of the Worst Forms of Child Labour*, 1999 (No. 182)
- *General principles and operational guidelines for fair recruitment and Definition of recruitment fees and related costs* of International Labour Organization

Among other things, this publication differentiates between the costs incurred when recruiting foreign nursing staff and the extent to which employers are entitled to demand reimbursement of these costs from their skilled workers.

- *United Nations Guiding Principles on Business and Human Rights* of the United Nations

The UN Guiding Principles on Business and Human Rights stipulate that companies have a responsibility to respect human rights and to prevent and remedy any negative impact their business activities may have on people.

MEDIAN considers a diverse, multinational workforce to be a great strength and also wants to offer people with a migrant background long-term personal and professional prospects and development opportunities that will enable them to gain a foothold in Germany in the long term. Against this background, MEDIAN and its affiliated companies are committed to the principles of fair recruitment and placement of nursing staff abroad as follows:

- MEDIAN will not recruit professionals from countries of origin that are included in the WHO health workforce support and safeguards list.
- All recruitment of foreign nursing staff must be done in writing or electronically. It must be possible to trace the recruitment process at all times.
- MEDIAN and its affiliated companies do not require the recruited specialists to pay in advance or reimburse any costs, expenses or fees associated with the recruitment process, either directly or indirectly through third parties.

The *Employer Pays Principle* applies: MEDIAN and its affiliated companies bear the entire costs of the recruitment process. This applies to the associated expenses such as language school, flights, the costs of the work permit and residence permit.

- Employment contracts or other contracts entered into by MEDIAN and affiliated companies will not contain any clauses obliging foreign nursing staff to reimburse costs, expenses or fees incurred in connection with their placement.

If foreign nursing staff are recruited through third parties as part of a commercial activity, MEDIAN and its affiliated companies prohibit any indirect obligation on the part of the foreign nursing staff towards the third party that benefits MEDIAN or its affiliated companies by claiming costs, expenses or fees via the third party. If MEDIAN learns that third parties are demanding appropriate remuneration from foreign nursing staff for their work, MEDIAN will first seek dialogue, issue warnings to contractual partners and, as a last resort, terminate the cooperation permanently.

- MEDIAN and its affiliated companies will not place foreign nursing staff in employment contracts if they would be directly or indirectly obliged to enter into binding or repayment obligations related to placement costs.
- Recruited nursing professionals are actively involved in relevant decision-making processes at MEDIAN. Offers such as the provision of accommodation or assistance in finding accommodation, supplementary language support, mentoring programmes and cultural support for sustainable integration can be accepted or declined.

MEDIAN has established a central responsibility for compliance with human rights and environmental obligations in the form of the Human Rights Officer. If, as a foreign nursing professional, as an agent for foreign nursing professionals, or in the course of your employment with MEDIAN or affiliated companies, you discover that MEDIAN or affiliated companies are in breach of this voluntary commitment, you have various options for lodging a complaint:

1. MEDIAN has established a complaints procedure, which is handled using the whistleblower system for reports in accordance with the Whistleblower Protection Act. This system allows complainants to submit information or express complaints either by providing their name or anonymously. The whistleblower system is managed by the legal professionals, who work in confidence at BETTE WESTENBERGER BRINK. The mandate relationship with MEDIAN ensures

the anonymity of complainants if desired. Even in the case of an anonymous report, complainants can remain in contact with the legal professionals, who work in confidence, via the whistleblower system after submitting the report. This system does not collect any personal data on the IT side (server logs, identifying cookies, etc.) nor does it require users to disclose their identity.

<https://median-kliniken.advowhistle.de/>

2. Alternatively, you can contact the Human Rights Officer of the MEDIAN Group: Syndikusrechtsanwalt Timo Behrend, Franklinstraße 28 - 29, 10587 Berlin, menschenrechte@median-kliniken.de, telephone number: 030 – 53 00 55 00.

In addition, the following rules of procedure apply to the handling of complaints:

[Rules of Procedure | MEDIAN Clinics](#)

If you have any questions about this policy statement or about human rights or environmental issues, please contact the Human Rights Officer at any time.

Berlin, 22.09.2025