

Policy Statement of IndoMedCare GmbH

on Fair and Responsible International Recruitment

for Nursing Professionals and Trainees in Nursing Professions

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IndoMedCare GmbH assumes a special responsibility in the international recruitment and placement of nursing professionals and trainees in nursing professions towards the recruited individuals, their countries of origin and the receiving employers and training providers in Germany. Our aim is fair, transparent, sustainable and human-rights-oriented recruitment with reliable support before, during and after entry into Germany.

IndoMedCare aligns its recruitment processes with the applicable legal requirements as well as with the principles and requirements of the quality seal “Faire Anwerbung Pflege Deutschland”. The following principles apply to all recruitment procedures commenced on or after 01 October 2026, insofar as they are applicable to the respective group of persons.

1. Ethical and International Standards

Our work is guided by the principles of the WHO Global Code of Practice on the International Recruitment of Health Personnel, the ILO core labour standards, the ILO General Principles and Operational Guidelines for Fair Recruitment, the UN Guiding Principles on Business and Human Rights, as well as the applicable legal and quality-seal-related requirements.

- We respect the human dignity, personal rights and freedom of decision of all recruited persons.
- Discrimination, deception, pressure, exploitation or inappropriate dependencies are not tolerated.
- Legal or international restrictions on recruitment from certain countries of origin are observed.
- We also require our cooperation and service partners to comply with these principles.

2. Employer-Pays Principle and Cost-Free Recruitment

Nursing professionals and trainees do not pay IndoMedCare any placement or recruitment fees. Recruitment-related costs that, under the applicable quality and testing provisions, are assigned to the employer-pays principle are not passed on to recruited persons.

- No deposits, security payments or comparable payments are required.
- Unlawful repayment, contractual penalty or binding clauses in connection with recruitment are not agreed.
- Where required under the applicable rules, necessary language examinations, recognition, visa, procedural, translation, certification or entry costs are allocated in accordance with the quality-seal requirements.
- If a recruited person has demonstrably made unlawful payments to a partner engaged by IndoMedCare, IndoMedCare will, after review, reimburse these in full and without undue delay.

3. Voluntariness and Informed Decision-Making

Participation in the recruitment process is voluntary. Nursing professionals and trainees may reject an employment or training offer or discontinue the recruitment process without incurring placement or recruitment costs.

- Essential contractual and procedural information is provided in good time, in writing and in an understandable form.
- Recruited persons are given sufficient time to review their documents and may ask questions or seek independent advice before making a decision.
- Before an employment or training contract is concluded, there is generally a personal or virtual meeting with the intended employer or training provider.

4. Transparency of Employment and Training Conditions

IndoMedCare ensures that recruited persons are informed, before making a binding decision, about the essential conditions of the intended workplace or training position.

- This includes in particular the place of employment or training, activity, working or training hours, remuneration, probationary period, annual leave entitlement and termination conditions.
- Where relevant, integration, induction, language support and recognition measures are presented transparently.
- Material subsequent changes to previously communicated employment or training conditions are communicated without delay.

5. Recognition of Foreign Professional Qualifications

Qualified nursing professionals are provided with understandable information about the recognition procedure, possible deficit notices and required compensatory measures.

- Where the law provides a choice between a knowledge test and an adaptation programme, IndoMedCare respects this freedom of choice.
- After receiving sufficient information, the nursing professional decides independently which compensatory measure is appropriate for them.
- IndoMedCare supports coordination with recognition authorities, employers and other parties involved without restricting the nursing professional's freedom of decision.

6. Special Principles for Trainees

When recruiting trainees for nursing professions, IndoMedCare places particular emphasis on transparent information regarding the duration of training, training allowance, nursing school, practical training locations, training conditions, accommodation and residence-law requirements.

- The training contract is concluded directly between the trainee and the training provider.
- The choice of training position is voluntary and follows a personal or virtual meeting.
- The cost-free recruitment principle and the other protective principles of this statement apply correspondingly to trainees insofar as provided for by the applicable quality and testing provisions.

7. Protection of Personal Documents

Passports, certificates or other original documents are not retained as security. Temporary provision of original documents takes place only with the knowledge and consent of the person concerned and only insofar as required for administrative or organisational purposes.

8. Responsibility Throughout the Service Chain

IndoMedCare accepts responsibility for ensuring that cooperation and service partners engaged by us in the country of origin or in other countries also comply with the principles of fair recruitment.

- Partners are contractually required to ensure cost-free recruitment for recruited persons and to prohibit deposits.
- Retention of passports or original documents as a means of pressure or security is prohibited.
- IndoMedCare reserves audit and control rights and requires appropriate remedial measures in the event of identified violations.
- In the event of serious or repeated violations, cooperation with a partner may be terminated.

9. Fair Employment, Training and Integration

IndoMedCare works with employers and training providers that commit to transparent, lawful and non-discriminatory employment and training conditions.

- International nursing professionals and trainees are to be treated in accordance with the applicable statutory, collective and contractual provisions.
- Structured induction, orientation and social integration are supported jointly with the receiving institutions.
- Depending on the project, IndoMedCare supports, among other things, arrival, residence registration, health insurance, bank account, tax ID, mobile phone services and other organisational steps.

10. Complaints Procedure and Protection Against Disadvantage

Nursing professionals and trainees may submit complaints, information or concerns to IndoMedCare at any time and without disadvantage. Complaints are treated confidentially, documented and generally processed no later than within three weeks.

If final clarification is not possible within this period, the complainant receives information within the three-week period about the current status and the further course of action.

The possibility of additionally contacting authorities, advisory bodies, employee representatives or other independent bodies remains unaffected.

11. Data Protection and Confidentiality

Personal data is processed in accordance with the General Data Protection Regulation (GDPR), the German Federal Data Protection Act and other applicable data-protection provisions. Data is disclosed only to the extent necessary and legally permissible to employers, training providers, authorities, recognition bodies, diplomatic missions or other parties involved.

12. Quality Assurance and Continuous Improvement

IndoMedCare regularly reviews its recruitment processes, cooperation agreements and service partners. Identified risks and violations are assessed and addressed through appropriate measures. This policy statement is reviewed and, where necessary, updated in the event of changes to legal requirements or to the requirements of the quality seal “Faire Anwerbung Pflege Deutschland”.

Responsible Contact Persons at IndoMedCare

The following contact persons are responsible for compliance with, monitoring and further development of these principles:

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