

Signite GmbH Policy Statement

on the fair and responsible recruitment and placement of skilled workers

1. Preamble

Signite GmbH operates in the field of international recruitment and placement of skilled workers. In doing so, we recognise that our activities have both economic and social implications and entail a special responsibility towards the placed workers, our clients, and the countries of origin and destination.

This policy statement sets out the binding principles by which Signite operates. It reflects our commitment to fair, ethically sound and legally compliant recruitment and placement practices and applies to Signite GmbH as well as to all our associated cooperation and business partners.

2. Respect for human rights and the legal framework

Signite is fully committed to respecting and protecting internationally recognised human rights. Our actions are guided in particular by:

- the United Nations' international human rights conventions,
- the UN Guiding Principles on Business and Human Rights,
- the core labour standards and the general principles and operational guidelines for fair recruitment of the International Labour Organisation (ILO).

We comply with all relevant national laws as well as all international and European legal requirements, particularly in the areas of labour, residence, migration and social law. Illegal or unethical conduct will not be tolerated.

3. Fair and ethically sound recruitment

Signite is committed to the transparent, non-discriminatory and ethically responsible recruitment of skilled workers. We do not actively recruit in countries where this would structurally weaken the local healthcare sector or which are listed on relevant protection and recommendation lists of international organisations (e.g. WHO).

Our placement services are based exclusively on the voluntary, informed decisions of skilled workers and are free from undue pressure, deception or dependency.

4. No fees and the employer-pays principle

The placement of skilled workers by Signite is, in principle, free of charge for the skilled workers.

Signite is expressly committed to the employer-pays principle. Accordingly, employers or clients bear all costs arising in connection with recruitment, placement, recognition, qualification, migration and integration.

In particular, no fees, charges or other financial obligations are imposed on skilled workers, either directly or indirectly.

5. Limiting the financial risk for skilled workers

Signite actively works to ensure that skilled workers are not exposed to any unreasonable financial burden or dependency.

Signite rejects any unlawful retention, repayment or contractual penalty clauses that exceed the legally permissible limits or contradict the criteria of the German quality seal “Faire Anwerbung Pflege Deutschland” (Fair Recruitment in Nursing Care Germany).

Where legally permissible retention agreements are agreed with employers, these must not relate to the placement fee and must be appropriate, time-limited, transparent and proportionate.

6. Transparency and Information

Signite ensures that skilled workers are informed in a clear and appropriate manner about:

- the placement process,
- their rights and obligations,
- the intended working and living conditions in Germany,
- as well as all relevant contractual terms.

This information is provided in good time, in a comprehensible manner, in writing and – where necessary – in a language the skilled worker understands. Personal data is always handled in accordance with data protection regulations.

7. Sustainability, Integration and Participation

Signite pursues a sustainable approach to recruiting skilled workers. The aim is not short-term placement, but long-term, sustainable professional and social integration.

This includes, in particular:

- a carefully tailored selection process that takes into account professional, linguistic and personal requirements,
- the development of linguistic and intercultural skills,
- support during the recognition and integration phase.

The active involvement of professionals in the entire process is encouraged and respected.

8. Overall responsibility for the service chain

The principles of this statement apply throughout the entire service chain. Signite therefore also requires its cooperation and business partners – particularly those abroad – to adhere to these principles.

Signite monitors compliance through appropriate organisational and contractual measures and reserves the right to respond appropriately in the event of breaches.

Managing Risks in Recruitment and Placement

The international recruitment and placement of skilled workers can be associated with risks – for example, with regard to unreasonable cost burdens on skilled workers, non-transparent or unfair recruitment practices among involved cooperation partners, restrictions on freedom of movement or termination, as well as discrimination or corruption along the recruitment chain. Signite actively engages with these risks and addresses them with suitable review and management instruments.

A key instrument for this is the CSR Risk Check (www.csr-risiko-check.de), an online tool provided by MVO Nederland, UPJ and the German Federal Government's Helpdesk on Business and Human Rights for country- and sector-specific risk analysis along the supply chain. Signite applies this instrument as needed or on an ad hoc basis, for example when onboarding new cooperation partners, in order to identify relevant risks and derive necessary preventive or remedial measures.

9. Complaints mechanisms and remedies

Signite provides fair, transparent and accessible complaint channels for professionals and business partners and makes an easily accessible complaints management system available to initiate immediate corrective action, e.g. in the event of a breach of the Code. This is carried out in accordance with the following complaints management process:

1. Receipt of the complaint (in writing, verbally, by email) from professionals, employers, partners or employees
2. Recording and assessment of the complaint regarding jurisdiction and the need for action
3. Implementation of improvement measures, informing those affected, and modifying processes or communication structures
4. Feedback to the complainant within 48 hours with information on the resolution or attempt at mediation
5. Subsequent review of the resolution and archiving of the complaint

Link to the complaint form: <https://www.signite-experts.com/beschwerdemanagement>

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Reports of possible breaches of this policy statement will be thoroughly investigated. Those affected will be protected from any detriment, and appropriate remedial measures will be taken where necessary. As a consequence of a breach, contractual relationships may, for example, be terminated.

10. Validity, Review and Further Development

This policy statement is binding and is regularly reviewed for currency, effectiveness and legal compliance. It will be amended accordingly in the event of changes to legal or professional requirements. The current version is publicly available.

Policy Statement of Signite GmbH – Date: [15 April 2026]