

APV

Grundsatzerklärung

Scope

This Code of Conduct applies to all locations and business units of CWL-Personal GmbH. At the same time, CWL-Personal GmbH also requires its cooperation partners to comply with the principles enshrined in this Code.

Objective

Our goal as an organization is to ensure the fulfillment of obligations and rules throughout the recruitment and placement process, based on the following principles:

- ein Bekenntnis zu fairer und ethisch vertretbarer Anwerbe- und Vermittlungspraxis
- The obligation to follow corporate policies
- [Alignment with the WHO Code of Practice for the international recruitment of healthcare professionals](#)
- [Application of the „Employer pays“-principle](#)
- Adherence to the following agreements:
 - international [human rights conventions](#),
 - [UN Guiding Principles on Business and Human Rights](#)
 - [ILO core labor standards](#), particularly the [General Principles and Operational Guidelines for Fair Recruitment of the ILO](#)
 - [IRIS standards of the international Organization of Migration \(IOM\)](#)

The company communicates its requirements to business partners and clients and checks for their receipt and approval.

Unconditionally demand and promote:

- Ethically acceptable recruitment of nursing staff from abroad
- Transparency in the recruitment process for all parties involved

Unconditionally respect:

- Human rights
- Labor and social standards

Unconditionally protect:

- Confidential company information
- Personal data
- Company property

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Communication

Management and all executives are responsible for communicating the related requirements to all employees and cooperation partners. Special attention is given to particularly vulnerable groups. The company ensures that the employment contracts it arranges include written provisions on employment relationships, support in the recognition process, support in the relocation process, and, if applicable, special cases.

Appropriateness of economic risk

CWL-Personal GmbH ensures that no financial burdens are imposed on the recruited nursing staff that are inconsistent with the “Employer pays” principle. There should be no hidden or excessive costs that lead to disproportionate financial strain on the nursing staff.

Transparency on structures, services, and costs

CWL-Personal GmbH commits to fully disclosing all relevant information about the placement process. This includes clear information on the services offered, fees, and potential additional costs, enabling the nursing staff to make an informed decision. This transparency fosters trust and reduces uncertainties.

Sustainability and participation

CWL-Personal GmbH is committed to sustainable recruitment practices that take both ecological and social aspects into account. A participatory approach is also pursued, involving the nursing staff in the process to ensure their needs and interests are considered, allowing for long-term engagement.

Overall responsibility

CWL-Personal GmbH takes full responsibility for the entire placement process. This means that all steps of the recruitment and integration of the nursing staff are carried out with the utmost care and in accordance with ethical standards. The company is committed to respecting the rights of the nursing staff and ensuring that all processes are fair and transparent.

Right of termination and withdrawal

The general terms and conditions and placement conditions require both contracting parties to comply with the provisions of the “Fair Recruitment Nursing Germany” quality seal. In the event of violations of these provisions, particularly against the payment prohibition and other requirements of the quality seal, CWL-Personal GmbH reserves the right to withdraw from the contract or terminate it without notice. Contracting parties are urged to take immediate measures to comply with the standards if a violation is identified.

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Recognition process under the Nursing Professions Act

CWL-Personal GmbH informs the recruited nursing staff about the legal requirements of the recognition process under the Nursing Professions Act. In the event of significant differences between foreign training and German standards, international nursing professionals are entitled to choose between an adaptation course and a knowledge test to obtain the required recognition of their qualifications. CWL-Personal GmbH is committed to transparently informing nursing staff about these options and the recognition process.

Complaint procedure

CWL-Personal GmbH provides a complaint procedure that allows nursing staff to report any violations or dissatisfaction with the placement process. Further information on the complaint procedure and related contact options is available on the company's website and is also personally provided to candidates.

Support

The company supports the international nursing staff and, if necessary, the client throughout the entire recruitment and placement process, acting as a constant point of contact and providing solutions for conflict situations after consultation with the parties.

Repayment clause

The employment contracts of the positions offered to/recruited candidates must not, under any circumstances, contain binding and repayment clauses for international nursing staff that contradict the current legal situation/jurisprudence.

Law and order

CWL-Personal GmbH complies with the applicable laws and regulations in the areas in which it operates and requires the same from its cooperation partners.

Transparency and partner dialogue

CWL-Personal GmbH recognizes the right of its cooperation partners to essential service information. Where possible, the relevant information will be specified and made publicly available.

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Integrity and anti-corruption

CWL-Personal GmbH bases its actions on generally accepted ethical values and principles, particularly integrity, honesty, respect for human dignity, openness, and non-discrimination based on religion, belief, gender, or ethnicity. The company rejects corruption and bribery as per the relevant UN Convention (from 2005). It promotes transparency, integrity, and responsible management and control within the company in an appropriate manner.

Child labor

No child labor is employed. No persons younger than 15 years or still of school age are employed.

Harassment

Employees are not subjected to any physical, sexual, psychological, or verbal harassment or abuse.

Non-discrimination

All employees are treated strictly according to their abilities and qualifications in all employment decisions, including, but not limited to, hiring and promotions, compensation, benefits, training, dismissals, and terminations.

Health and safety

Employers provide safe and healthy working conditions that meet at least the legal requirements to prevent accidents and personal injury.

Environment

The company employs environmentally friendly practices, continuously improving them. It meets environmental protection regulations and standards and handles natural resources responsibly.

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Social Media Guidelines

1. Responsibility

You are responsible for what you do and post on social networks. Please be conscious of this responsibility, both for your own sake and that of your employer.

2. Personality

If you express your opinion on social media without an official mandate, please make it clear that you are expressing your personal views and not speaking on behalf of the company. Always use “I” instead of “we.”

3. Transparency

Your personal contribution matters on social media. Therefore, always identify yourself with your real name. Nicknames may be common, but it’s more helpful and pleasant for both the reader and yourself to provide clarity about your identity.

4. Added value

A lot of redundant and useless information is produced and reproduced on social media. Therefore, before posting, ask yourself whether your contribution truly adds value for the reader. If not, kindly spare them. If you want to comment on a topic within your field of expertise and are unsure, it is best to consult with your supervisor beforehand.

5. Legal framework

Be aware that using social networks is not a lawless space—you are subject to the same laws and contracts to which you have agreed as if you were at your desk, on a train, or in a pub. This also applies to nicknames. Many networks also have their own terms of use, which become binding upon registration.

6. Copyright

A key point of the Code of Conduct is copyright: social media can often tempt users to simply copy content from others. This is not allowed under copyright law. Do not copy material from others in your posts and present it as your own. If you refer to other content, use links. Avoid long quotations. Only upload images or videos if you have the necessary rights, such as permission from the photographer or filmmaker and the consent of the individuals depicted.

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7. Privacy and security

One of the biggest concerns people have when using the internet and social media is that personal and confidential data might become visible to everyone due to accidents, criminal actions, or simple ignorance. Viruses and hackers can also be a problem. However, these risks can be mitigated by following certain principles and being aware of the privacy settings on popular online platforms.

8. Prudence

Always remember that your posts are public—and may remain so for a long time. Stay calm in heated debates and don't get carried away. Resist the impulse to post, even if you feel you're right. Always argue factually, don't insult anyone, and show respect to your dialogue partners.

Rosenheim, 21.10.2024

Ort, Datum

Unterschrift CWL-Personal GmbH

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