

Bader Group-Policy

Guideline - Recruitment fee policy

No employee should be required to pay any prohibited recruitment and / or hiring fees at any time. No employee should be required to pay any fees once they have been made an offer.

2. Scope

The Bader Group recognizes that responsible employment is critical to the protection of employees and their rights. The provisions outlined in the following are applicable to all employees.

3. Guidance on recruitment fees

3.1. Employees shall not be required to pay fees to obtain or retain their employment.

a.) Employees, including temporary, migrant, student, contract, direct employees, and any other type of employee shall not pay the following recruitment and service fees: application, recommendation, recruiting, hiring, placement, and processing fees, of any kind or at any stage, including agency, intermediary, or employer operating, administrative and overhead costs associated with the recruitment, selection, hiring, and placement of those employees.

b.) Foreign migrant employees shall not pay the following recruitment- and service-related costs:

i. Pre-departure fees and costs including but not limited to::

1. Skills tests
2. Additional certifications
3. Medical exams / screening if required by applicable law
4. Pre-departure training or orientation
5. Any other requirements to access the job opportunity

ii. Documentation / permits and associated costs of obtaining such documents and / or permits:

1. New passport / identity documents needed for the purposes of obtaining employment, including renewal(s) required for the purposes of retaining employment.
2. Visas (including renewals)
3. Temporary work or residence permits (including renewals)
4. Police clearance fee
5. Birth certification fee

iii. Transportation and accommodation costs (including all taxes and fees):

1. Transportation and accommodation costs after the employment offer has been made and accepted, from their home in their sending country to the port of departure
2. Transportation from sending country to receiving country port of entry
3. Transportation from receiving country port of entry to auditee's facility or provided accommodations
4. Border-crossing fees
5. Relocation costs if asked to move once employment has begun
6. Return transportation to employee's home country at the end of employment

iv. Arrival / on-boarding including but not limited to:

1. New-hire training or orientation
2. Medical exams / screening

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3.2 The following costs can be paid by the employee if noted in their contract and a receipt or record of payment is provided. They must be without mark-up

- a. Basic expense items to prepare for the interview such as CV copies, photos, copies of existing documents and certificates, incidentals;
- b. Costs to meet minimum qualifications for the job such as a degree or certification;
- c. Passport replacement cost due to employee loss or fault. For replacing visas / permits this

also includes photo(s), providing / photocopying any documents, etc.

- d. Dormitory and meals;
- e. Costs for any legally allowable levies may be charged but must be deducted in a pro-rata manner. At the end of employment, apart from situations where there is dismissal for gross misconduct, employees shall not be charged any remaining balance due on any levies.

3.3 All other initial and ongoing employment expenses and fees for work-related equipment, tools, and apparel shall be borne by the employer. If other costs are added by any agency or intermediary which are not required by applicable law or by the employment site, the employee shall not be required to pay.

3.4 Termination and early leave: If the employee has given reasonable notice as required by per applicable law no fees shall be charged

4. Exceptions

- If employees travel back to their hometown, village or place of residence before departing their home country to start work in the country of destination, they are responsible for those costs.
- If employees initiate the application, presenting themselves to the company at the place of employment, they will have paid or will pay some of the fees in section 3.1.b such as passport, visa, residency certificate, transportation and shall not expect to be reimbursed as the employer did not seek them out in their country, province, state or region of origin.
- If a fee is not specifically listed in this policy or does not fit any of the categories, foreign migrant employees shall not pay anything that a local employee would not pay.
- Employees shall not expect to be reimbursed for basic items to prepare for the interview such as CV preparation, photos, copies of existing documents and certificates, and incidentals.

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Annex I

To help understanding the fees, the following tables note what fees the employee **MUST NOT** pay, and **MAY** pay. The tables are divided according to the employee's situation and stage in the recruiting and / or hiring process.

Stage in the employment process: Down the first column are the three stages in the employment process: before a job offer has been made and accepted; after a job offer has been made and accepted and once the job has begun

Employee's situation: Some employees may choose to present themselves at the facility ready to work and may therefore have incurred costs that may not be reimbursed (e.g. documentation, transportation). This situation is represented in the second column. The third column represents the situation where the recruiting is initiated by the company.

		Employee's situation	
		Employees present themselves at the auditee's site (whether or not nationals of the country)	Foreign migrant employees or nationals are recruited by the auditee's company
Stage in the employment process	Before a job offer has been made and accepted	<ul style="list-style-type: none"> • Fees noted in section 1.A (non-legislated fees) • Skills tests, additional certifications, medical exams / screening 	<ul style="list-style-type: none"> • Fees noted in section 1.A (non-legislated fees) • Skills tests, additional certifications, medical exams / screening
	After a job offer has been made and accepted	<ul style="list-style-type: none"> • Any other skills tests, certifications, medical exams / screening • Pre-departure training or orientation • Transportation and accommodation costs and fees if employee is asked to move to another location • Other legal requirements 	<ul style="list-style-type: none"> • Any other skills tests, certifications, medical exams / screening • Pre-departure training or orientation • Documentation (incl. passport, visa) /permits / fees and associated costs, including renewals to retain employment • Transportation and accommodation costs and fees from home to auditee's facility and to return home at end of employment • Other legal requirements
	Once job has begun	<ul style="list-style-type: none"> • Arrival and onboarding • Other legal requirements • Ongoing agency administrative fees • Relocation costs if asked to move 	<ul style="list-style-type: none"> • Ankunft und Onboarding • Sonstige rechtliche Anforderungen • Laufende Verwaltungsgebühren von Agenturen • Umzugskosten bei Aufforderung zum Umzug

*Fees the employee **MUST NOT** pay depending upon the employee's situation and stage in the recruiting and hiring process. Items in bold highlight the differences between the two employee situations.*

		Employee's situation	
		Employees present themselves at the auditee's site (whether or not nationals of the country)	Employees present themselves at the auditee's site (whether or not nationals of the country)
Stage in the employment process	Before a job offer has been made and accepted	<ul style="list-style-type: none"> • Basic items to prepare for the interview, such as CV copies, photos, copies of existing documents and certificates, incidentals • Costs to qualify for the job • Transportation and accommodation costs • Initial passport / visas / residency permits 	<ul style="list-style-type: none"> • Basic items to prepare for the interview, such as CV copies, photos, copies of existing documents and certificates • Costs to qualify for the job • Transportation and accommodation costs
	After a job offer has been made and accepted	<ul style="list-style-type: none"> • Passport replacement due to employee loss / fault, including visas, permits • Transportation and accommodation costs unless the employee is asked to move to another location 	<ul style="list-style-type: none"> • Passport replacement due to employee loss / fault, including visas, permits
	Once job has begun	<ul style="list-style-type: none"> • Dormitory / meals if disclosed in contract 	<ul style="list-style-type: none"> • Dormitory / meals if disclosed in contract

Fees the employee MAY pay depending upon the employee's situation and stage in the recruiting and hiring process. The employer may choose to pay these fees. Items in bold are the differences between the two employee situations.