



**Corporate Principles and Commitment
of Hackbarth's Consulting GmbH
for the Recruitment and Employment of International Nursing and Healthcare
Professionals**

“The following principles of responsible corporate governance form the basis of our actions.”

1. Hackbarth's Consulting fully commits to fair, transparent, and ethically sound recruitment of nursing professionals from third countries. We pledge to implement, without exception, the following guiding principles of the quality initiative “Fair Recruitment of Nurses Germany” and to ensure their compliance throughout all our business activities and along the entire service chain.

These guiding principles are:

1. Written and traceable documentation of all contracts, agreements, and information
2. Cost-free recruitment for the nursing professional
3. Transparent design of bonding and repayment clauses
4. Clear and strict contractual regulations in the event of program withdrawal
5. Compliance with international human rights and labor standards
6. Accountability throughout the entire service chain

Hackbarth's Consulting GmbH commits to taking full responsibility, within the scope of our business activities, for the recruitment of nursing professionals from third countries in line with the principles of the “Fair Recruitment of Nurses Germany” quality seal — including responsibility for the actions of third parties acting on our behalf or in our name.

2. We commit ourselves to the ethical, transparent, and sustainable recruitment of nursing professionals and other healthcare personnel. Our actions are strictly guided by the provisions of the WHO Global Code of Practice on the International Recruitment of Health Personnel (www.who.int/publications/i/item/who-global-code-of-practice-on-the-international-recruitment-of-health-personnel), as well as by compliance with the WHO Health Workforce Support and Safeguards List — which includes the exclusion of recruitment from nations currently listed therein (www.who.int/news-room/questions-and-answers/item/who-health-workforce-support-and-safeguards-list).

3. We commit to the full respect and implementation of fundamental international standards for the protection of human rights and the fair recruitment of workers. Our activities are guided by the Core Labour Standards of the International Labour Organization (ILO), in particular:

- Freedom of association and the right to collective bargaining
- Elimination of forced labor
- Abolition of child labor
- Prohibition of discrimination in employment and occupation
- Occupational health and safety

In addition, our work is aligned with the ILO Guidelines for Fair Recruitment, the UN Guiding Principles on Business and Human Rights (UNGPs), and the International Human Rights Conventions of the United Nations.

References:

- www.ilo.org/de/resource/news/erklaerung-ueber-grundlegende-prinzipien-und-rechte-bei-der-arbeit-ilo
- <https://ilo.org> (media-download-fair recruitment)
- www.ungp.org/wp-content/uploads/UNGPRF_Deutsch_Dez2017.pdf
- www.unric.org/de/allgemeine-erklaerung-menschenrechte



4. We commit to the Employer Pays Principle. Under no circumstances shall the nursing professional be required to bear:

- either directly or indirectly, any recruitment fees,
- nor any costs for services directly related to the recruitment process.

This applies to the entire service chain.

5. We commit to refraining from the use of inappropriate bonding and repayment clauses and to not mediating employment contracts that include bonding or repayment obligations related to recruitment costs.

The maximum duration of contractual binding shall not exceed two years.

A repayment obligation in the event of the nursing professional's early withdrawal from an ongoing language course in the country of origin is permissible only if the withdrawal occurs for reasons attributable to the nursing professional.

The repayment amount may exclusively include costs actually incurred up to the time of withdrawal in the country of origin, specifically:

- participation in the language course,
- the language examination,
- and administrative fees for translations, certifications, visas, and the recognition of equivalence.

The maximum repayment amount in the event of course termination shall be limited to the actual costs of the language course, up to a ceiling of €3,000.

In case of termination of employment within the first two years, a proportional repayment may apply (e.g., repayment after 12 months of employment: €1,500).

The responsibility for implementing and monitoring compliance with this commitment lies with the company's management.