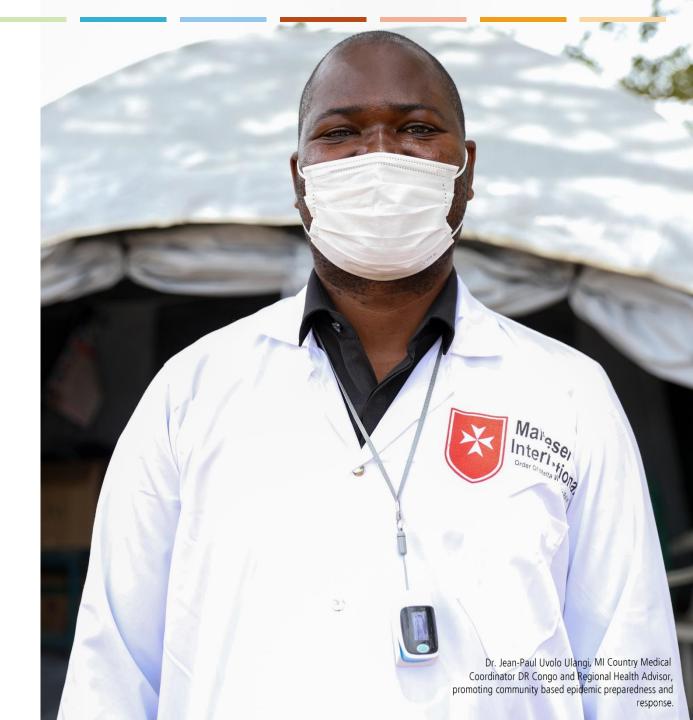


Code of Conduct



ARTICLE 2
Giving and accepting gifts

ARTICLE 3
Preventing fraud and corruption

ARTICLE 4
Preventing sexual exploitation, abuse, and harassment

ARTICLE 5 Protecting the rights of children ARTICLE 6
Use and
protection of MI
assets & brand

ARTICLE 7
Use and protection of MI data & knowledge

ARTICLE 8
Weapons

ARTICLE 9
Alcohol & drugs

ARTICLE 10
Public & media
relations, and the use
of social networks

I. Identity, Mission, Vision, Claim

II. The Scope of the Code

III. Implementation of the Code

IV. Upholding Professional Ethics, Neutrality, Impartiality, and Non-Discrimination

V. LoA & Self-Declaration

VI. Definitions

VII. Reporting Channels

I. Identity, Mission, Vision, Claim

Identity:

Since 1956, our core task has been to improve the health and well-being of suffering and displaced people around the world. We provide emergency and disaster relief in the immediate aftermath of acute disasters and work towards the rehabilitation and reconstruction of afflicted communities. We work on the frontlines to provide immediate and long-term relief to those who need it most.

We take a holistic approach to health in our programming, which includes the protection of nature and the environment. We work with local resources and engage local partners, ensuring that vulnerable populations are at the center of our interventions. In doing so, we extend our support to all individuals in need regardless of gender, political belief, origin, or faith.

We are a highly motivated, experienced, and international team, bound by empathy and respect for our diversity. Christian values and the humanitarian principles of humanity, neutrality, impartiality, and independence are the foundations of our work. We are committed to the highest levels of innovation, professionalism, quality, and transparency. Through our work, we experience joy, find greater meaning and a sense of belonging among like-minded individuals.

Globally, we are united by the goal of standing alongside the displaced and people in need. Together, we're working to build a life of health and dignity.



ARTICLE 2
Giving and accepting gifts

ARTICLE 3
Preventing fraud and corruption

ARTICLE 4
Preventing sexual exploitation, abuse, and harassment

ARTICLE 5 Protecting the rights of children ARTICLE 6
Use and
protection of MI
assets & brand

ARTICLE 7
Use and protection of MI data & knowledge

ARTICLE 8
Weapons

ARTICLE 9 Alcohol & drugs ARTICLE 10
Public & media
relations, and the use
of social networks

I. Identity, Mission, Vision, Claim

II. The Scope of the Code

III. Implementation of the Code

IV. Upholding Professional Ethics, Neutrality, Impartiality, and Non-Discrimination

V. LoA & Self-Declaration

VI. Definitions

VII. Reporting Channels

Mission:

Our mission is to improve the health and well-being of suffering and displaced people around the world. We provide emergency and disaster relief in the immediate aftermath of acute disasters and work towards the rehabilitation and reconstruction of afflicted communities. We work on the frontlines to provide immediate and long-term relief to those who need it most.

We deploy our experts in crisis situations, conflict-ridden areas, during natural disasters and epidemics around the world. We intervene to provide medical and mental health support, clean water, sanitation, and hygiene (WASH), food, protection, and shelter where possible.

We take a holistic approach to health in our programming, which includes the protection of nature. We work with local resources and engage local partners, as well as the Order of Malta's global network, to provide rapid and effective responses in even the most remote locations. People are at the center of our assistance.

Our goal is to sustainably increase the resilience of those worst affected by disasters. We are also committed to contributing to the achievement of the UN Sustainable Development Goals. In doing so, we extend our support to all individuals in need regardless of gender, political belief, origin, or faith.

Christian values and the humanitarian principles of humanity, neutrality, impartiality, and independence are the foundation of our work. We are committed to the highest levels of innovation, professionalism, quality, and transparency. Driven by our values, and thanks to our over 65 years of experience, we remain a trustworthy organization for our donors, partners, and most importantly, for the people we serve. Through our work we experience joy, find greater meaning, and a sense of belonging among like-minded individuals.

Globally, we are united by the goal of standing alongside the displaced, and people in need: Together, we're working to build a life of health and dignity.

Mission Statement:

We improve the health and well-being of suffering and displaced people in crises situations around the world. In this way, we especially fulfil the mission of the Sovereign Order of Malta to "serve the poor and the sick". We provide support regardless of gender, political belief, origin, or faith.

Vision:

We aspire to a world where all individuals – particularly those in need and those who are displaced – live a life of health and dignity.

Claim:

Health and dignity for people in need.

ARTICLE 2
Giving and accepting gifts

ARTICLE 3
Preventing fraud and corruption

ARTICLE 4
Preventing sexual exploitation, abuse, and harassment

ARTICLE 5 Protecting the rights of children ARTICLE 6
Use and
protection of MI
assets & brand

ARTICLE 7
Use and protection of MI data & knowledge

ARTICLE 8
Weapons

ARTICLE 9
Alcohol & drugs

ARTICLE 10

Public & media
relations, and the use
of social networks

MI Teams in 2023

I. Identity, Mission, Vision, Claim

II. The Scope of the Code

III. Implementation of the Code

IV. Upholding Professional Ethics, Neutrality, Impartiality, and Non-Discrimination

V. LoA & Self-Declaration

VI. Definitions

VII. Reporting Channels

II. The Scope of the Code

Malteser International expects its staff to comply with all applicable laws, policies, rules, and regulations as well as to maintain the highest standards of honesty and integrity, and especially to respect and protect the rights and dignity of all.

The Code of Conduct outlined below is designed to guide all those working with Malteser International by setting out what is considered acceptable professional and ethical behavior. By accepting their appointment all members of staff undertake to discharge their duties in line with the requirements of this Code.

The Code of Conduct forms part of the policies described in Malteser International's Operational Handbook and must be included with all country-specific Staff Rules and Regulations that are issued.

Asia: 371 staff in 5 teams



Africa: 314 staff in 6 teams



Middle East: 47 staff in 3 teams



Americas: 229 staff in 3 teams



ARTICLE 2
Giving and accepting gifts

ARTICLE 3
Preventing fraud and corruption

ARTICLE 4
Preventing sexual exploitation, abuse, and harassment

ARTICLE 5 Protecting the rights of children ARTICLE 6
Use and
protection of MI
assets & brand

ARTICLE 7
Use and protection of MI data & knowledge

ARTICLE 8
Weapons

ARTICLE 9 Alcohol & drugs ARTICLE 10
Public & media
relations, and the use
of social networks

I. Identity, Mission, Vision, Claim

II. The Scope of the Code

III. Implementation of the Code

IV. Upholding Professional Ethics, Neutrality, Impartiality, and Non-Discrimination

V. LoA & Self-Declaration

VI. Definitions

VII. Reporting Channels With their signature MI staff also commits itself to the compliance with the corresponding policies and guidelines as follows:

- Safeguarding Guideline incl. PSEAH, Complaint and Response Mechanisms & Safe Disclosure Guideline (former Whistleblowing)
- PR including Social Media Guideline
- · Safety and Security Guideline

This Code of Conduct applies to all national, international, full, and part-time staff, as well as to interns, volunteers and consultants working with Malteser International who for the purpose of this document are all referred to as "staff". It applies wherever Malteser International works -on and off duty, including the organization's headquarters.

Cases in which conditions relating to locally employed staff are at variance with this code must be discussed with the responsible country or program coordinator. The approval of headquarters must be sought where deviations may be thought to be necessary.

It is important to note, however, that Malteser International staff and MI-related personnel are obligated to comply with the Inter Agency Standing Committee (IASC) Core Principles for the Prevention of Sexual Abuse and Exploitation (6 IASC Core Principles). Where the IASC establishes a stricter standard than local laws, the principles of the IASC will prevail.



ARTICLE 2
Giving and accepting gifts

ARTICLE 3
Preventing fraud and corruption

ARTICLE 4
Preventing sexual exploitation, abuse, and harassment

ARTICLE 5 Protecting the rights of children ARTICLE 6
Use and
protection of M
assets & brand

ARTICLE 7
Use and protection of MI data & knowledge

ARTICLE 8 Weapons ARTICLE 9
Alcohol & drugs

ARTICLE 10
Public & media
relations, and the use
of social networks

I. Identity, Mission, Vision, Claim

II. The Scope of the Code

III. Implementation of the Code

IV. Upholding Professional Ethics, Neutrality, Impartiality, and Non-Discrimination

V. LoA & Self-Declaration

VI. Definitions

VII. Reporting Channels

III. Implementation of the Code

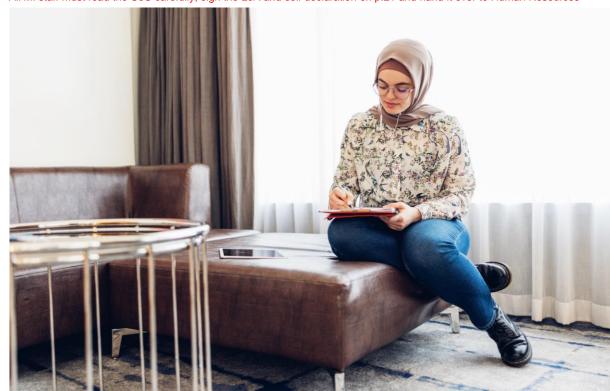
Malteser International's Code of Conduct forms part of all contracts of employment or conditions of service. The Code is to be given and explained to all staff before they sign the employment contract. Each member of staff is required to sign an acknowledgement of their commitment to comply with the Code.

The Human Resources Department (HR) is responsible for managing and monitoring the application of this Code and resolving issues that arise under it. Disciplinary processes are to be administered by HR in consultation with the Country or Program Coordinator. In sensitive cases the Global Safeguarding Manager or the Internal Auditor will administer the complaint. HR and the Secretary General will take decisions on disciplinary action.

In field locations, the country or program coordinator is responsible for ensuring that the provisions of the Code are applied. The Code is designed to act as a guideline but does not cover every possible situation staff may face. Any situation in which staff members may be in doubt about issues covered under the Code ought to be discussed with the country or program coordinator.

Violations of this Code may have serious implications for Malteser International as an organization as well as for the staff concerned. Violations may result in disciplinary action, dismissal, and claims for compensatory damages. In cases where local law has been breached, Malteser International may report infractions to local authorities, and/or take civil legal action against staff.

All MI staff must read the CoC carefully, sign the LoA and self declaration on p.21 and hand it over to Human Resources



ARTICLE 2
Giving and accepting gifts

ARTICLE 3
Preventing fraud and corruption

ARTICLE 4
Preventing sexual exploitation, abuse, and harassment

ARTICLE 5 Protecting the rights of children ARTICLE 6
Use and
protection of M
assets & brand

ARTICLE 7
Use and protection of MI data & knowledge

ARTICLE 8
Weapons

ARTICLE 9
Alcohol & drugs

ARTICLE 10
Public & media
relations, and the use
of social networks

- I. Identity, Mission, Vision, Claim
- II. The Scope of the Code
- III. Implementation of the Code

IV. Upholding Professional Ethics, Neutrality, Impartiality, and Non-Discrimination

V. LoA & Self-Declaration

VI. Definitions

VII. Reporting Channels

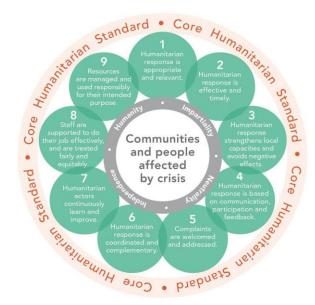
IV. Upholding Professional Ethics, Neutrality, Impartiality, and Non-Discrimination

As a humanitarian and development NGO, Malteser International and its staff are committed to principled, accountable, and high-quality humanitarian action according to the *Core Humanitarian Standard on Quality and Accountability* ¹.

Malteser International staff must work in an ethical manner from a position of neutrality and impartiality, and not practice any discrimination.

This includes:

- Working with a focus on health, medical staff are obligated to maintain medical professional ethics.
- Various forms of systematic discrimination intersect with each other. Applying an intersectional lens in all our work helps connect human rights to the multiple forms of discrimination based on gender, age, disability, religion, ethnicity, marriage status, sexual orientation, and identity, etc.
- Diversity trainings will support educate staff members on awareness around diversity issues and non- discrimination. Engagement of staff on issues related to anti-racism and unconscious bias to set standards and expectations for behavior.
- As a people-centered organization Malteser International must do its utmost to ensure people are treated with dignity and respect.
 Any form of discrimination and workplace bullying of any kind (verbal, physical, online, etc.) is a breach of conduct and are grounds for disciplinary action, up to and including dismissal.





¹ <u>http://www.corehumanitarianstandard.org/</u>

ARTICLE 1

Avoiding conflicts of interest

ARTICLE 2
Giving and accepting gifts

ARTICLE 3
Preventing fraud and corruption

ARTICLE 4
Preventing sexual
exploitation, abuse,
and harassment

ARTICLE 5 Protecting the rights of children ARTICLE 6
Use and
protection of MI
assets & brand

ARTICLE 7
Use and protection of MI data & knowledge

ARTICLE 8
Weapons

ARTICLE 9
Alcohol & drugs

ARTICLE 10
Public & media
relations, and the use
of social networks

- I. Identity, Mission, Vision, Claim
- II. The Scope of the Code
- III. Implementation of the Code
- IV. Upholding Professional Ethics, Neutrality, Impartiality, and Non-Discrimination
- V. LoA & Self-Declaration
- VI. Definitions
- VII. Reporting Channels

ARTICLE 1

Avoiding conflicts of interest

A conflict of interest is a situation in which a person must choose between the duties of their work and their private interests. Avoiding conflicts of interest is an overarching principle of fighting against corruption. Conflicts of interest can occur in the context of Malteser International's work, and it is important that they are identified and managed effectively. Conflicts of interest may arise in the course of humanitarian and development work when, for example, decisions are taken on the selection of staff, suppliers, service providers, and partner organizations.

However, they can also arise when decisions are made regarding the locations where Malteser International will operate, and the staff making these decisions have connections to particular potential beneficiary locations or groups..

This may especially be the case when staff and/or their family members hold business interests in a supplier or service provider that Malteser International intends to do business with, when persons related to Malteser International staff are considered for employment, or when staff are affiliated with another organization.

- Family in this context is generally to be understood as including first-degree relatives such as parents, children, spouses, siblings, or other close dependents. This definition of family may need to be adjusted according to the local context. A business interest is assumed when staff or their family manage private businesses or hold a financial interest in a private business.
- Malteser International staff are not permitted to authorize contracts or participate in selection or decision-making processes when there is a family or private business relationship that could lead to a conflict of interest.
- Staff must give notice to their superior as soon as they find themselves in a situation involving a potential conflict of interest.

 Malteser International staff must raise any potential conflicts of interest they may perceive, which have not already been disclosed by the parties involved, to the relevant superior, or by using the established <u>Complaint and Response</u> <u>Mechanism</u> or the <u>Safe Disclosure</u> procedure where applicable.

Where staff fail to disclose a conflict of interest, disciplinary processes may be invoked.

ARTICLE 2
Giving and accepting gifts

ARTICLE 3
Preventing fraud and corruption

ARTICLE 4
Preventing sexual exploitation, abuse, and harassment

ARTICLE 5 Protecting the rights of children ARTICLE 6 Use and protection of MI assets & brand ARTICLE 7
Use and protection of MI data & knowledge

ARTICLE 8 Weapons ARTICLE 9 Alcohol & drugs ARTICLE 10
Public & media
relations, and the use
of social networks

I. Identity, Mission, Vision, Claim

II. The Scope of the Code

III. Implementation of the Code

IV. Upholding Professional Ethics, Neutrality, Impartiality, and Non-Discrimination

V. LoA & Self-Declaration

VI. Definitions

VII. Reporting Channels

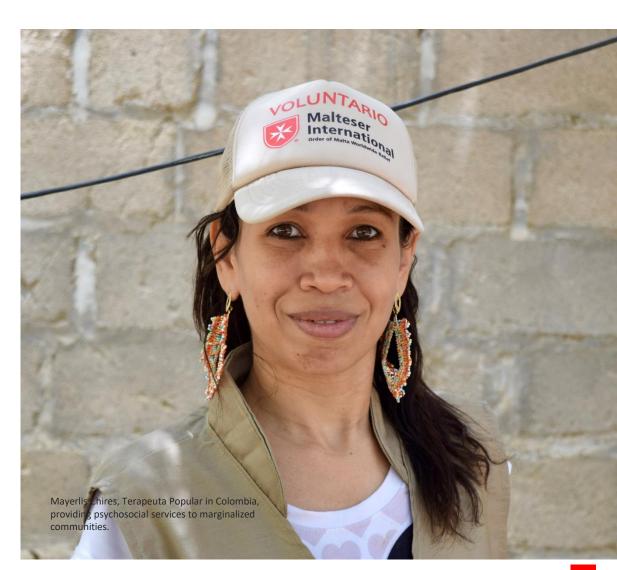
ARTICLE 2

Giving and accepting gifts

Malteser International has a responsibility to use resources economically. In order to safeguard independence and impartiality, as a rule Malteser International and its staff must not offer or accept any gifts, including invitations for entertainment or travel. Exceptions from this rule may only be made in the context of local culture and necessity. The giving and acceptance of gifts shall under no circumstances lead to further obligations for Malteser International.

Malteser International expects its staff to report and pass on to the organization any gifts that they may in exceptional cases personally accept with a value above the minimum set out in the country specific Staff Rules and Regulations.

In the absence of any country specific rule, a limit of 20 Euro per year, or the equivalent amount in local currency, is set.



ARTICLE 2
Giving and accepting gifts

ARTICLE 3
Preventing fraud and corruption

ARTICLE 4
Preventing sexual exploitation, abuse, and harassment

ARTICLE 5 Protecting the rights of children ARTICLE 6
Use and
protection of MI
assets & brand

ARTICLE 7
Use and protection of MI data & knowledge

ARTICLE 8
Weapons

ARTICLE 9 Alcohol & drugs ARTICLE 10
Public & media
relations, and the use
of social networks

- I. Identity, Mission, Vision, Claim
- II. The Scope of the Code
- III. Implementation of the Code
- IV. Upholding Professional Ethics, Neutrality, Impartiality, and Non-Discrimination
- V. LoA & Self-Declaration
- VI. Definitions
- VII. Reporting Channels

ARTICLE 3

Preventing fraud and corruption

Corruption threatens good governance, sustainable development, democratic processes, and fair business practices. Fighting corruption helps to build civil society and eliminate social injustice, which is in line with Malteser International's vision to enable people "to lead a healthy life with dignity". Corruption can be defined as "the misuse of entrusted power for private gain". Corruption can take the form of bribery, fraud, embezzlement, and extortion.

It has many faces, such as accepting or providing money, goods, or services in order to gain advantages, which may include favorable treatment, special protection, or extra services. Corruption is not exclusively a matter of money. In certain circumstances, providing a person with a job, services, or other favors can also be considered to be corruption.

Malteser International is committed to ensuring that all the resources it receives are used fully for the benefit of those for whom they are intended. Fraud and corruption are harmful to the fulfilment of our goals and are not tolerated by Malteser International. The risk of corruption needs to be included in all risk assessments, and preventive measures must be planned accordingly.

• Malteser International staff may not use any power or professional status they derive from their work with Malteser International for their own profit or gain. They are required to handle the engagement of staff, the procurement of goods, the delivery of relief items, and the provision of access to relief or development services with due care, in a transparent manner, and avoiding any conflict of interest. This attitude must also encompass a respectful attitude with regard to the rights of those entitled to our services.

- Fraud and embezzlement are illegal, and no member of staff may use these methods to gain personal or professional advantage.
- It is the responsibility of Malteser International's management and all staff to create a culture of value, trust and fairness, and to actively oppose and prevent corruption.
- It is the responsibility of Malteser International's management, staff, partners, and stakeholders to raise any suspicion of fraud or corruption through the established <u>Complaint and Response</u> <u>Mechanism</u> or <u>Safe Disclosure</u> procedure.

Malteser International has issued a set of guidelines for finance, administration, logistics, personnel, and partner projects to ensure the proper management of accounts, funds, assets, and relief goods, and to prevent fraud and corruption. These are contained in the Operational Handbook and must be followed fully.

ARTICLE 2
Giving and accepting gifts

ARTICLE 3
Preventing fraud and corruption

ARTICLE 4
Preventing sexual exploitation, abuse,

and harassment

ARTICLE 5 Protecting the rights of children ARTICLE 6
Use and
protection of Mi
assets & brand

ARTICLE 7
Use and protection of MI data & knowledge

ARTICLE 8 Weapons ARTICLE 9
Alcohol & drugs

ARTICLE 10
Public & media
relations, and the use
of social networks

- I. Identity, Mission, Vision, Claim
- II. The Scope of the Code
- III. Implementation of the Code
- IV. Upholding Professional Ethics, Neutrality, Impartiality, and Non-Discrimination
- V. LoA & Self-Declaration
- VI. Definitions
- VII. Reporting Channels

ARTICLE 4

Preventing Sexual Exploitation, Abuse, and Sexual Harassment (PSEAH)

Malteser International is committed to respecting the dignity of all staff and beneficiaries. Working with vulnerable people including children, people with disabilities, women, elderly people, and members of minority groups inevitably brings power imbalances.

It is the responsibility of all staff to create and maintain an environment that prevents sexual exploitation, abuse, and harassment. In order to prevent any abuse of power, Malteser International has adopted the *Inter Agency Standing Committee Core Principles for the Prevention of Sexual Abuse and Exploitation (6 IASC Core Principles)*. These principles form an integral part of the Malteser International Code of Conduct and are binding on all staff members:

- 1. Sexual exploitation and abuse by staff constitute acts of gross misconduct and are therefore grounds for termination of employment.
- 2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense.
- 3. Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited. This includes exchange of assistance that is due to beneficiaries.
- 4. Any sexual relationship between those providing humanitarian assistance and protection and a person benefitting from such humanitarian assistance and protection that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work.
- 5. Where a staff member develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.

6. Staff members are obligated to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have a particular responsibility to support and develop systems which maintain this environment.

In order to promote transparency and encourage an environment which prevents sexual exploitation, abuse, and harassment Malteser International managers and supervisors are strongly discouraged to enter a sexual relationship with staff they have authority over. Staff members are obligated to notify HR and the Global Safeguarding Manager about the sexual relationship in order to discuss measures to be taken, e.g., re-assignation of supervisory responsibility.

SEAH complaints are sensitive complaints that should be handled with the utmost confidentiality towards the complainant, survivor/affected person and the subject of the complaint.

It is mandatory for all staff to participate in a **PSEAH training annually**.

ARTICLE 2
Giving and accepting gifts

ARTICLE 3
Preventing fraud and corruption

ARTICLE 4
Preventing sexual exploitation, abuse.

and harassment

ARTICLE 5 Protecting the rights of children ARTICLE 6
Use and
protection of M
assets & brand

ARTICLE 7
Use and protection of MI data & knowledge

ARTICLE 8
Weapons

ARTICLE 9
Alcohol & drugs

ARTICLE 10
Public & media
relations, and the use
of social networks

- I. Identity, Mission, Vision, Claim
- II. The Scope of the Code
- III. Implementation of the Code
- IV. Upholding Professional Ethics, Neutrality, Impartiality, and Non-Discrimination
- V. LoA & Self-Declaration
- VI. Definitions
- VII. Reporting Channels

ARTICLE 4

On this basis:

- All staff members have the duty to report any concerns or suspicions to whose responsibility it is to take appropriate action according to the Complaint and Response Mechanism.
- Retaliation against individuals who report a genuine suspicion of misconduct or cooperate in an investigation of misconduct is **strictly prohibited** and may result in disciplinary action against the individual taking the retaliatory action.
- No disciplinary action will be taken against staff who report a genuine concern that later turns out to be mistaken or misguided
- This assurance does not apply to individuals who file an intentionally false complaint that they know to be untrue or who are involved in the intentional dissemination of false information. If an investigation reveals that a complaint is intentionally false, this may result in disciplinary action against the person who made the intentionally false complaint or falsified the information provided to investigators. Malteser International recognizes, however, that intentionally false complaints about SEAH are extremely rare.

- Malteser International follows the 'Need to Know' principle of confidentiality to protect all persons involved in a complaint. This means that sensitive information should only be shared with those who need to know it to manage or conduct an appropriate response, to meet legal or contractual donor reporting requirements, or to protect others from further harm. Those who need to know should receive as little information as necessary and no more.
- Mishandling confidential information can have serious implications for the integrity of the process, the outcome of an investigation, and the safety and well-being of the individuals involved. Breaches of confidentiality are considered as gross misconduct.

Non-compliance with the above stated rules will result in disciplinary action.

The <u>Complaint and Response Mechanism</u> is explained in detail in the <u>Safeguarding</u> Guideline.



ARTICLE 2
Giving and accepting gifts

ARTICLE 3
Preventing fraud and corruption

ARTICLE 4
Preventing sexual exploitation, abuse, and harassment

ARTICLE 5
Protecting the rights of children

ARTICLE 6
Use and
protection of MI
assets & brand

ARTICLE 7
Use and protection of MI data & knowledge

ARTICLE 8
Weapons

ARTICLE 9
Alcohol & drugs

ARTICLE 10
Public & media
relations, and the use
of social networks

I. Identity, Mission, Vision, Claim

II. The Scope of the Code

III. Implementation of the Code

IV. Upholding Professional Ethics, Neutrality, Impartiality, and Non-Discrimination

V. LoA & Self-Declaration

VI. Definitions

VII. Reporting Channels

ARTICLE 5

Protecting the rights of children

Malteser International, including all members of staff and partners, is committed to ensuring that the well-being, safety and rights of all children it serves are protected and respected at all times. This means that the principle of safety and dignity of all children is upheld and valued and consistently reflected in the behavior and conduct of staff and partners.

In line with humanitarian standards, MI is committed to create and maintain at operational and programmatic level a safe environment for all boys and girls including children-at-risk and protect them from all forms of violence (sexual, emotional, physical), exploitation and abuse.

Malteser International prohibits the use of all forms of violence, including sexual violence, or the abuse of power against all children regardless of their age, sex, language, religion, nationality, ethnic origin, status, class, sexual orientation, physical condition or impairment. Any response to alleged violations to this Code of Conduct are based on a child rights-based and survivor-centered approach with clearly established investigation processes.



ARTICLE 2
Giving and accepting gifts

ARTICLE 3
Preventing fraud and corruption

ARTICLE 4
Preventing sexual
exploitation, abuse,
and harassment

ARTICLE 5
Protecting the rights of children

ARTICLE 6
Use and
protection of MI
assets & brand

ARTICLE 7
Use and protection of MI data & knowledge

ARTICLE 8 Weapons ARTICLE 9
Alcohol & drugs

ARTICLE 10
Public & media
relations, and the use
of social networks

- I. Identity, Mission, Vision, Claim
- II. The Scope of the Code
- III. Implementation of the Code
- IV. Upholding Professional Ethics, Neutrality, Impartiality, and Non-Discrimination
- V. LoA & Self-Declaration
- VI. Definitions
- VII. Reporting Channels

ARTICLE 5

- Malteser International expects its staff to give special consideration to the impact of its projects and programs on all children taking into consideration any additional vulnerabilities.
- All staff aware of, or suspecting, instances of all forms of violence, exploitation or abuse against children must report the misconduct or suspected misconduct immediately to their direct supervisor and to the Global Safeguarding Manager taking into consideration the established Safe Disclosure procedure.
- Malteser International commits to protecting survivors by providing or referring them to adequate support services to assist their recovery and rehabilitation.
- At all times the consent of the child's caregiver or legal guardian must be obtained prior to any engagement with children including for the purpose of communications, marketing, and advocacy.

- When taking photos or videos, Malteser International must provide clear information as to purpose and reasons about why we want to take a person's image and explain that it is their right to refuse to participate or to change their mind. For images with children, assent and informed consent must be provided.
- Malteser International strictly prohibits any images or videos capturing a child including with identifiable information being exploited in any form or abused.
- In all our media communication, we shall recognize children as dignified humans, not hopeless objects.

Malteser International has adopted VENRO's endorsed Standard on the Rights of Children, which has been incorporated into the Operational Handbook, and endorses the OECD DAC Recommendation on Ending Sexual Exploitation, Abuse, and Harassment in Development Co-operation and Humanitarian Assistance (2019).

ARTICLE 2
Giving and accepting gifts

ARTICLE 3
Preventing fraud and corruption

ARTICLE 4
Preventing sexual exploitation, abuse, and harassment

ARTICLE 5 Protecting the rights of children

Use and protection of MI assets & brand ARTICLE 7
Use and protection of MI data & knowledge

ARTICLE 8 Weapons ARTICLE 9
Alcohol & drugs

ARTICLE 10
Public & media
relations, and the use
of social networks

- I. Identity, Mission, Vision, Claim
- II. The Scope of the Code
- III. Implementation of the Code
- IV. Upholding Professional Ethics, Neutrality, Impartiality, and Non-Discrimination
- V. LoA & Self-Declaration
- VI. Definitions
- VII. Reporting Channels

ARTICLE 6

Use and protection of Malteser International's assets and brand

International Malteser provides assets including vehicles, computers, mobile phones, equipment in offices, and team accommodation, as well as items bearing the Malteser International logo such as staff clothing, for the use of staff in the fulfilment of the organization's mission. Accordingly, the corresponding guidelines on safety and security must be followed:

- Malteser International staff must handle all assets with due care, in a manner that ensures no harm is done to Malteser International's reputation. Staff must return all such items received to the organization at the end of their assignment.
- Malteser International vehicles may only be used for authorized purposes and driven by authorized staff.

- Staff may not use clothing or other items branded with the Malteser International logo for private gain or other advantage.
- It is prohibited to download and access pornographic material with Malteser International mobile devices and computers.

The misuse of professional equipment may lead to disciplinary action.



ARTICLE 2
Giving and accepting gifts

ARTICLE 3
Preventing fraud and corruption

ARTICLE 4
Preventing sexual exploitation, abuse, and harassment

ARTICLE 5 Protecting the rights of children ARTICLE 6
Use and
protection of MI
assets & brand

ARTICLE 7
Use and protection
of MI data &
knowledge

ARTICLE 8
Weapons

ARTICLE 9
Alcohol & drugs

ARTICLE 10
Public & media
relations, and the use
of social networks

I. Identity, Mission, Vision, Claim

II. The Scope of the Code

III. Implementation of the Code

IV. Upholding Professional Ethics, Neutrality, Impartiality, and Non-Discrimination

V. LoA & Self-Declaration

VI. Definitions

VII. Reporting Channels

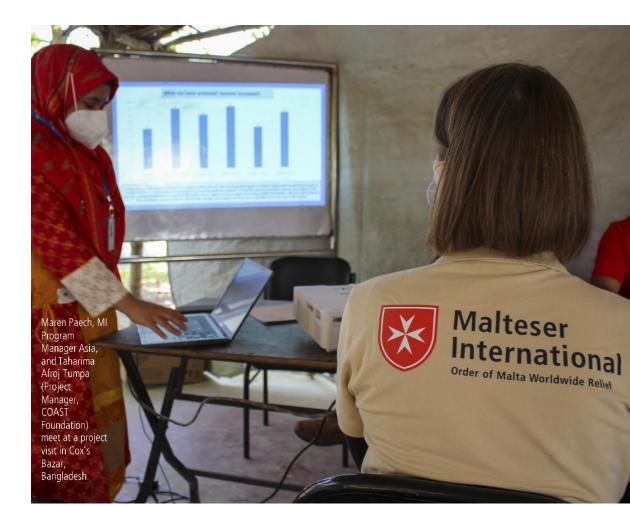
ARTICLE 7

Use and protection of Malteser International's data & knowledge

Over the years Malteser International has established a significant base of expertise and intellectual property. Malteser International provides its staff access to this knowledge through physical and electronic documents and communication systems. Staff are obligated to protect all Malteser International data, to practice confidentiality, especially of personal and patient data, and to follow the <u>IT</u> and Data Protection Guidelines in force.

- Staff must secure access to Malteser International information and accounting systems and protect all data relevant to Malteser International's work.
- Staff may not use Malteser International's intellectual property outside of their work at any time during or after the termination of their employment with Malteser International.

Data, especially sensitive complaints, personal and patient data, must be treated as confidential and may not be used for purposes other than those officially authorized by Malteser International.



ARTICLE 2
Giving and accepting gifts

ARTICLE 3
Preventing fraud and corruption

ARTICLE 4
Preventing sexual exploitation, abuse, and harassment

ARTICLE 5 Protecting the rights of children ARTICLE 6
Use and
protection of MI
assets & brand

ARTICLE 7
Use and protection of MI data & knowledge

ARTICLE 8
Weapons

ARTICLE 9
Alcohol & drugs

ARTICLE 10
Public & media
relations, and the use
of social networks

I. Identity, Mission, Vision, Claim

II. The Scope of the Code

III. Implementation of the Code

IV. Upholding Professional Ethics, Neutrality, Impartiality, and Non-Discrimination

V. LoA & Self-Declaration

VI. Definitions

VII. Reporting Channels

ARTICLE 8

Weapons

In some countries, Malteser International works in areas of armed conflict and instability. The presence and carrying of weapons on Malteser International property or by Malteser International staff could severely affect the safety of Malteser International's operations.

- Weapons are prohibited from any building owned or operated by Malteser International, including team accommodation.
- The carrying of weapons on or in Malteser International vehicles is prohibited. Armed civilian and military personnel are not permitted on or in the organization's vehicles. The Malteser International safety and security guidelines are to be followed should armed persons threaten violence if not carried by Malteser International vehicles.

 The use of armed guards on Malteser International property must be authorized by Malteser International Headquarters.



ARTICLE 2
Giving and accepting gifts

ARTICLE 3
Preventing fraud and corruption

Preventing sexual exploitation, abuse, and harassment

ARTICLE 5 Protecting the rights of children ARTICLE 6
Use and
protection of MI
assets & brand

ARTICLE 7
Use and protection of MI data & knowledge

ARTICLE 8 Weapons ARTICLE 9
Alcohol & drugs

Public & media relations, and the use of social networks

I. Identity, Mission, Vision, Claim

II. The Scope of the Code

III. Implementation of the Code

IV. Upholding Professional Ethics, Neutrality, Impartiality, and Non-Discrimination

V. LoA & Self-Declaration

VI. Definitions

VII. Reporting Channels

ARTICLE 9

Alcohol and drugs

To safeguard the safety and security of staff and to prevent damage to Malteser International's property and reputation the use of alcohol and drugs is not permitted in Malteser International offices, warehouses or vehicles. Malteser International offices are non-smoking areas. A limited consumption of alcohol may be permitted by the person responsible for the location on the occasion of celebrations.

Malteser International staff are not permitted to work or drive while under the influence of any narcotic substances, legal or illegal, that affect their ability to perform their duties. It is forbidden to bring any such substance to Malteser International offices or warehouses.

Working under the influence of alcohol or drugs is gross misconduct, and staff found to be under the influence of alcohol or drugs during work periods will be dealt with in accordance with disciplinary procedures.



ARTICLE 2
Giving and accepting gifts

ARTICLE 3
Preventing fraud and corruption

ARTICLE 4
Preventing sexual exploitation, abuse, and harassment

ARTICLE 5 Protecting the rights of children ARTICLE 6
Use and
protection of MI
assets & brand

ARTICLE 7
Use and protection of MI data & knowledge

ARTICLE 8
Weapons

ARTICLE 9
Alcohol & drugs

ARTICLE 10
Public & media
relations, and the use
of social networks

I. Identity, Mission, Vision, Claim

II. The Scope of the Code

III. Implementation of the Code

IV. Upholding Professional Ethics, Neutrality, Impartiality, and Non-Discrimination

V. LoA & Self-Declaration

VI. Definitions

VII. Reporting Channels

ARTICLE 10

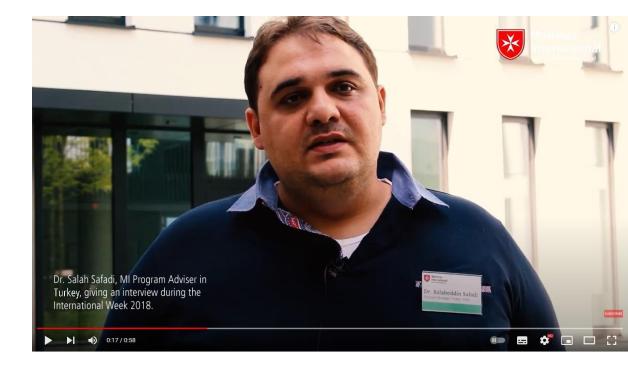
Public and media relations, and the use of social networks

Malteser International considers good media coverage to be pivotal to the success of its programs. Public awareness of our work is essential to assure support for our goals. It may also affect the safety and security of our staff. Beyond this, we are aware that the public perception of our beneficiaries is shaped partly by how we present them. Malteser International staff should always be aware that whenever they express an opinion in public, this could be interpreted to reflect on the organization as a whole.

Therefore:

 All media communication ought to be undertaken in a responsible, respectful, and transparent manner in accordance with the PR Guidelines.

- Malteser International staff are obligated to conduct all contact with the media through the communications departments in the relevant Malteser International Regional Headquarters.
- When using social media, Malteser International staff are expected to follow the <u>Social Media Guidelines</u>.



ARTICLE 1 Avoiding conflicts of interest	ARTICLE 2 Giving and accepting gifts	ARTICLE 3 Preventing fraud and corruption	ARTICLE 4 Preventing sexual exploitation, abuse, and harassment	ARTICLE 5 Protecting the rights of children	ARTICLE 6 Use and protection of MI assets & brand	ARTICLE 7 Use and protection of MI data & knowledge	ARTICLE 8 Weapons		
I. Identity, Mission, Vision, Claim II. The Scope of the Code	The Code of Conduct will be reviewed every 4 years or earlier if necessary. This Code of Conduct has been issued by the Secretary General of Malteser International with the approval of the Board of Directors.								
III. Implementation of the Code	^								
IV. Upholding Profession Ethics, Neutrality, Impartiality, and Non- Discrimination	nal ()	illel							

ARTICLE 9

Alcohol & drugs

ARTICLE 10

Public & media relations, and the use of social networks

V. LoA & Self-Declaration

VI. Definitions

VII. Reporting Channels



Cologne, February 2023

Clemens Graf von Mirbach-Harff

ARTICLE 2
Giving and accepting gifts

ARTICLE 3
Preventing fraud and corruption

ARTICLE 4
Preventing sexual
exploitation, abuse,
and harassment

ARTICLE 5
Protecting the rights of children

ARTICLE 6
Use and
protection of MI
assets & brand

ARTICLE 7
Use and protection of MI data & knowledge

ARTICLE 8
Weapons

ARTICLE 9 Alcohol & drugs ARTICLE 10
Public & media
relations, and the use
of social networks

I. Identity, Mission, Vision, Claim

II. The Scope of the Code

III. Implementation of the Code

IV. Upholding Professional Ethics, Neutrality, Impartiality, and Non-Discrimination

V. LoA & Self-Declaration

VI. Definitions

VII. Reporting Channels

Letter of Acknowledgement

I have received Malteser International's Code of Conduct, which I have read, understood, and agree to abide by.

With my signature I also commit myself to the compliance with the corresponding policies and guidelines named in the CoC and other guidelines that will be added to the operational handbook.

Self-Declaration

I hereby declare that I have never been held civilly or criminally liable for any alleged sexual misconduct and that no criminal or civil investigation is currently underway against me in connection with any such allegations.

I solemnly agree to immediately notify my supervisors at MI if such an investigation is initiated.

Name			
Date			
Cianad			

Please sign this page and return it to Malteser International Human Resources.

ARTICLE 2
Giving and accepting gifts

ARTICLE 3
Preventing fraud and corruption

ARTICLE 4
Preventing sexual
exploitation, abuse,
and harassment

ARTICLE 5 Protecting the rights of children ARTICLE 6
Use and
protection of M
assets & brand

ARTICLE 7
Use and protection of MI data & knowledge

ARTICLE 8 Weapons ARTICLE 9 Alcohol & drugs

Public & media relations, and the use of social networks

I. Identity, Mission, Vision, Claim

II. The Scope of the Code

III. Implementation of the Code

IV. Upholding Professional Ethics, Neutrality, Impartiality, and Non-Discrimination

V. LoA & Self-Declaration

VI. Definitions

VII. Reporting

Definitions

Safeguarding

Safeguarding is the responsibility of each organisation to ensure that their staff or operations do not harm adults or children. The organisation has policies and procedures in place, from a Code of Conduct to a safe reporting mechanism, investigation systems and recruitment / vetting procedures as well as appropriate disciplinary follow-up in case of substantiated breaches.

Sexual Exploitation

Any actual or attempted abuse of position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual Abuse

Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

(Sexual) Harassment

Sexual Harassment is a continuum of unacceptable and unwelcome behaviours and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for sexual favours and sexual, verbal or physical conduct or gestures, that are or might reasonably be perceived as offensive or humiliating. It is usually a pattern of behaviour, but it can also be a single incident. Sexual harassment has widely been understood as relating to the workplace but is also included in the spectrum of behaviours that are not acceptable conduct by our staff, be it in the workplace or with affected populations.

ARTICLE 2 Giving and accepting gifts

ARTICLE 3
Preventing fraud and corruption

ARTICLE 4
Preventing sexual
exploitation, abuse,
and harassment

ARTICLE 5 Protecting the rights of children ARTICLE 6
Use and
protection of MI
assets & brand

ARTICLE 7
Use and protection of MI data & knowledge

ARTICLE 8 Weapons ARTICLE 9 Alcohol & drugs

Public & media relations, and the use of social networks

I. Identity, Mission, Vision, Claim

II. The Scope of the Code

III. Implementation of the Code

IV. Upholding Professional Ethics, Neutrality, Impartiality, and Non-Discrimination

V. LoA & Self-Declaration

VI. Definitions

VII. Reporting Channels

Definitions

Prevention from Sexual Exploitation, Abuse and Sexual Harassment (PSEAH)

The term PSEA is mainly used by the United Nations and NGOs to refer to measures taken to protect persons at risk of sexual exploitation and abuse by their own staff and associated personnel. Malteser International also includes Sexual Harassment in the CoC and thus uses the term "Protection from Sexual Exploitation and Abuse and Sexual Harassment" with its acronym PSEAH.

Children

All persons under the age of 18 are considered children. Sexual activity with children is prohibited regardless of the age of the majority or age of consent locally. Mistaken belief in the age of the child is not a defense.

Affected Person

A person who is alleged to have suffered sexual exploitation, abuse, or harassment.

Survivor

A person who is, or has been, sexually exploited or abused.

Complainant

The person filing the complaint (this may or may not be the affected person).

Source: UN SEA Glossary 2017, One Oxfam PSEA Policy 2021

ARTICLE 5 ARTICLE ARTICLE 6 ARTICLE 7 ARTICLE 8 ARTICLE 9 ARTICLE 2 Avoiding conflicts Giving and Preventing fraud Preventing sexual Protecting the Use and protection Weapons Alcohol & drugs Public & media Use and of interest accepting gifts and corruption exploitation, abuse, rights of children of MI data & relations, and the use and harassment assets & brand knowledge of social networks **Reporting Channels** If you are in-country staff members, please follow the Complaints and Response Mechanism displayed in the office or under Sharepoint in I. Identity, Mission, the Safeguarding Guideline. If this is not an option for you, please contact following persons at HQ: Vision, Claim For MI Staff Worldwide II. The Scope of the Code Sexual Exploitation, Abuse and Sexual Harassment (SEAH) Global Safeguarding Manager, Shane Fischer (she/her) shane.fischer@malteser.org III. Implementation of the Code **Fraud & Corruption** Internal Auditor, Gerhard Serafin (he/him) gerhard.serafin@malteser.org IV. Upholding Professional Ethics, Neutrality, Impartiality, **Bullying, Harassment, Discrimination** Head of Human Resources, Sonja Greiner (she/her) and Non-Discrimination sonja.greiner@malteser.org V. LoA & Self-Online Safe Disclosure (former Whistleblowing) System Malteser is in the process of creating a web-based digital Safe Disclosure Declaration System that will be available to you 24/7 (going live in Q3 2023). The system is protected and confidential. It can be used with any internet-enabled device VI. Definitions (smartphone, laptop, tablet, etc.) and in multiple languages, anonymously if desired. **Ombudsperson** Dr. Karl Sidhu, LL.M. (he/ihm) VII. Reporting Channels Phone: +49 (0)89 2441334-60 Email: sidhu@svs-legal.de Address: SvS Rechtsanwälte, Widenmayerstraße 36, 80538 München, Germany https://www.svs-legal.de

Avoiding conflicts Giving and Preventing fraud Preventing sexual Protecting the Use and Use and protection Weapons of interest accepting gifts and corruption exploitation, abuse, rights of children protection of MI of MI data & and harassment assets & brand knowledge **Reporting Channels** If you are in-country staff members, please follow the Complaints and Response Mechanism displayed in the office or under Sharepoint in I. Identity, Mission, the Safeguarding Guideline. If this is not an option for you, please contact following persons at HQ: Vision, Claim For HQ Staff II. The Scope of the Code MI Federal Prevention Officer (Bundespräventionsbeauftragter) Sexual Exploitation, Abuse Ansgar Kesting (he/him), Phone: 0221 9822 3409 and Sexual Harassment (SEAH) ansgar.kesting@malteser.org or praevention-intervention@malteser.org III. Implementation https://www.malteser.de/praevention/praeventionsbeauftragte.html of the Code Global Safeguarding Manager, Shane Fischer (she/her) IV. Upholding shane.fischer@malteser.org Professional Ethics, Neutrality, Impartiality, and Non-Discrimination Free and anonymous consultation without starting any internal processes Ombudspersons (SEAH) https://www.malteser.de/praevention/ombudsstellen.html V. LoA & Self-Safe Disclosure You make appointment with the Compliance can an Declaration hinweisgeber@malteser.org Personal VI. Definitions **Online Safe Disclosure** Malteser is in the process of creating a web-based digital Safe Disclosure System that will be available to you 24/7 (former Whistleblowing) (going live in Q3 2023). The system is protected and confidential. It can be used with any internet-enabled device (smartphone, laptop, tablet, etc.) and in multiple languages, anonymously if desired. VII. Reporting System Dr. Karl Sidhu, LL.M. (he/ihm) **Ombudsperson (Compliance)** Phone: +49 (0)89 2441334-60

Email: sidhu@svs-legal.de

https://www.svs-legal.de

ARTICLE 4

ARTICLE 3

ARTICLE 2

ARTICLE

ARTICLE 5

ARTICLE 6

Address: SvS Rechtsanwälte, Widenmayerstraße 36, 80538 München, Germany

ARTICLE 7

ARTICLE 8

email:

this

ARTICLE 10

Public & media

relations, and the use

of social networks

ARTICLE 9

Alcohol & drugs

Officer

via