Code of Conduct

1. Introduction

Malteser International is the Sovereign Order of Malta’s international humanitarian relief agency. We stand by those affected by poverty, disease, conflict and disasters. We put people at the heart of our work, and are committed to serving those in need by helping them to live a healthy life with dignity. As a Catholic organization working in humanitarian aid and development, our work is rooted in Christian values, and is undertaken according to humanitarian principles.

Malteser International has a high reputation with the public, its partners, authorities, and donors for its professional work, integrity and respectful attitude to beneficiaries. This reputation is important for carrying out effective work in the future, and needs to be maintained. All Malteser International staff represent the organization through their work and life; it is therefore essential that they demonstrate their support and commitment to Malteser International’s values and principles, and respect Malteser International’s nature as a Catholic organization in the conduct of their work.

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

The Code of Conduct outlined below is designed for the guidance of all persons 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.

2. The scope of the code

This Code of Conduct covers all national, international, full and part time staff, as well as 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, 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. Where deviations may be necessary, the approval of headquarters must be sought.
3. Implementation of the code

Malteser International's Code of Conduct is to be explained and given to all staff before they begin their assignment. Each member of staff is required to sign an acknowledgement of their intent to comply with the Code.

Malteser International Human Resources (HR) is responsible for managing and monitoring the application of this Code, and resolving issues that arise under it. In field locations, the country or program coordinator is responsible for ensuring the application of the provisions of the Code. 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. Disciplinary processes and complaints are to be administered by the relevant HR officer in consultation with the country or program coordinator.

4. Upholding professional ethics, neutrality and impartiality

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\(^1\). Furthermore, as an organization working with a focus on health, medical staff are obliged to maintain medical professional ethics.

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

5. 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 how they are identified and managed is important. Conflicts of interest may arise in the course of humanitarian and development work when, for example, decisions are taken in 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

\(^1\) [www.corehumanitarianstandard.org](http://www.corehumanitarianstandard.org)
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 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 expects all staff to raise any potential conflicts of interest they may perceive, which have not already been disclosed by the parties involved.

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

6. Giving and accepting gifts

Malteser International is bound to the economic use of funds. To safeguard independence and impartiality, Malteser International as a rule does 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 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, or the equivalent amount in local currency, is set.

7. 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 have to be planned accordingly.

- Malteser International expects its staff not to 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 should 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 to and prevent corruption.

- It is the responsibility of Malteser International’s management, staff, partners and stakeholders to raise any suspicion on fraud or corruption through the established whistleblowing system.

Malteser International has issued a set of guidelines for finance, administration, logistics, personnel, and partner projects to assure 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 carefully.

### 8. Preventing sexual exploitation

Malteser International is committed to respecting the dignity of all staff and beneficiaries. Working with vulnerable people including children, persons 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 and abuse. In order to prevent any abuse of power:

- Malteser International expects staff to abstain completely from sexual relationships of any kind with beneficiaries, especially safeguarding the rights of children, women, and persons with disabilities.

- Malteser International expects staff to respect the dignity of every person, and therefore to refrain from degrading, humiliating, or exploitative behavior towards others, including verbal harassment and harassment through digital devices.

- Malteser International managers and supervisors may not enter a sexual relationship with staff they supervise. In case of such relationship, the supervisory process has to be rearranged.
• Regardless of local laws or lack of such laws, staff must never engage in any sexual activity or form a sexual relationship with children. For the purpose of this Code, children are defined as all persons under the age of 18 years, irrespective of deviating local or national law or custom.

• All staff aware of, or suspecting, misconduct in the form of sexual exploitation or abuse must report the misconduct or suspected misconduct using the established whistleblowing system.

Acting in a way that breaches the above rules is gross misconduct. Staff breaking the above rules will be dealt with in accordance with disciplinary procedures.

9. Use and protection of Malteser International’s assets and brand

Malteser International 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 Malteser International staff in the fulfilment of Malteser International’s mission. Accordingly, the corresponding guidelines on safety and security must be followed:

• Malteser International expects staff to handle all assets with due care, and in a manner that ensures no harm is done to Malteser International’s reputation, and to return all items received to the organization at the end of his/her 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.

10. Use and protection of Malteser International’s data and 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 the organization’s paper and electronic documents and communication systems. Staff are obliged to protect all Malteser International data, to practice confidentiality, especially of personal and patient data and to follow the ICT and data guidelines in force.

• Staff are expected to secure access to Malteser International information and accounting systems, and to protect all data relevant to Malteser International’s work.

• Staff may not use Malteser International’s intellectual property outside of their work during or after the termination of their employment with Malteser International.

• Data, especially personal and patient data, has to be treated as confidential and may not be used for purposes other than those officially authorized by Malteser International.
11. Weapons

In some countries, Malteser International works in areas of armed conflict and instability. The presence of weapons or armed persons may severely affect the safety of Malteser International’s operations.

- Malteser International prohibits weapons in any building owned or operated by Malteser International, including team accommodation.
- Malteser International prohibits the carrying of weapons on or in the organization’s vehicles. Armed civilian and military personnel are not permitted on or in the organization’s vehicles. Should armed persons threaten violence if not carried by Malteser International vehicles, the Malteser International safety and security guidelines are to be followed.
- The use of armed guards on Malteser International property must be authorized by Malteser International headquarters.

12. 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 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, nor 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.

13. 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 of how 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.
• Malteser International staff are obliged 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 Social Media Guidelines.

This Code of Conduct has been issued by the General Secretary of Malteser International.

Cologne, April 11th, 2016

Ingo Radtke

Annex

Whistleblowing Guideline
I have received Malteser International’s Code of Conduct and the Whistleblowing Guideline, which I have read, understood and agree to abide by.

Name __________________________________________

Date   _________________________________________

Signed_________________________________________