



**Malteser  
International**  
Order of Malta Worldwide Relief

# **Malteser International Safe Disclosure Guideline**

February 23<sup>rd</sup>, 2024, G. Serafin & J. Clemens

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## Imprint

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Date: 02/2024

## Introduction

The Directive (EU) 2019/1937 of the European Parliament and of the Council on the protection of persons who report breaches of Union law came into force in October 2019. The EU Directive is intended to improve the protection of reporting persons and provides, among other things, that companies must install their own internal reporting system for safe disclosure. For this reason, each Member State, and thus also Germany, is obliged to transpose the provisions of the EU Directive into national law. Germany has fulfilled this obligation by passing the so-called Whistleblower Protection Act (HinSchG), effective from July 2023.

The aim of the Whistleblower Protection Act is, in particular, to strengthen the protection of reporting persons and other persons affected by a report and to ensure that they are not threatened with disadvantages (retaliations, reprisals) in the context of a report.

In order to provide employees and volunteers with security when reporting potential compliance violations, this Safe Disclosure Guideline with the following regulations has been adopted as a valid set of rules. It defines in particular the scope of application, the confidentiality requirement, the reporting points and the protection of the reporting person.

Malteser International's MI Safe Disclosure Guideline replaces the previous Whistleblowing Guideline issued in 2016.

The basis of the safe disclosure system is a trustworthy processing of the reports received and the guarantee of secure reporting channels as well as reporting points. A corresponding reporting mechanism for complaints and the safe disclosure system of Malteser International therefore transparently describes the procedural principles and the procedural steps that are followed in the case of individual tips and complaints about compliance violations.

### 1. Scope of application

One of the central tasks of Malteser International is to promote a "healthy" environment, i.e. a "communication culture", in which sensitive issues can be communicated openly and without fear of negative consequences. We therefore encourage everyone - whether staff members, volunteers, former colleagues, project partners, beneficiaries, suppliers, external consultants or other third parties, etc. - to inform us of potential violations of the MI Code of Conduct (CoC) and / or to inform us of potential violations of the law so that we can clarify and remedy them at an early stage. Different types of misconduct that can be considered as reportable violations are described in [chapter 5](#) of this guideline, reflecting – among others - levels of severeness, sensitivity as well as the distinction from complaints and MI's separate Complaint and Response Mechanism (CRM)

The Safe Disclosure Guideline is intended to create the framework conditions for reporting potential violations of laws, international regulations and all internal corporate regulations (e.g., Code of Conduct) within the framework of Malteser International's integrity management. It should also help to ensure that information on potential violations is received in compliance with data protection and data security and processed with due regard for confidentiality.

## 2. Reporting persons

Reporting persons are understood to be natural persons who report or disclose information about violations obtained in connection with their (also voluntary) activities at Malteser International. Not only staff members, volunteers, former colleagues are entitled to report violations, but also project partners, beneficiaries, suppliers, external consultants or other third parties, etc.

The Safe Disclosure Guideline however does not oblige anyone to actually provide information.

## 3. Reporting points

### **For Malteser International staff:**

If you believe that the actions of any staff member, or person(s) having to do with Malteser International could constitute significant misconduct, you should report your observations with the responsible person according to the MI CRM. For non-sensitive cases<sup>1</sup>, please inform your line manager in the first place. If you do not feel comfortable speaking to your line manager for any legitimate reason or because you fear negative personal consequences for yourself such as reprisal, victimization, or dismissal, you may instead contact the line manager's superior.

### **For project and business partners, beneficiaries and all other stakeholders:**

You should raise your observations with MI's Program or Country Coordinator in charge.

In circumstances where it would be inappropriate to approach either the Malteser International person in charge or their supervisor, you may report your observation directly to MI's headquarters by using the reporting points as mentioned further down in this chapter.

Please always report full details of your observations along with your concern (such as locations, date, time, names, ...) and any available supporting evidence. Please also state whether you wish your identity to be kept confidential.

When addressing a significant misconduct through the reporting points, please give a brief reason why Malteser International managers in charge in the country should not deal with the issue.

For other non-sensitive complaints<sup>2</sup> that do not constitute significant misconduct as described in [chapter 5](#), please refer to MI's CRM at national level.

For submitting / reporting information on actual or suspected violations and / or significant misconduct, the following reporting points are available:

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<sup>1</sup> For the differentiation between sensitive and non-sensitive cases and / or complaints please refer to the MI CoC, which lays out the context of "sensitive cases / complaints" as well as the general criteria for handling sensitive cases / complaints and refers to either this SDG or to the (Safeguarding) CRM.

<sup>2</sup> See footnote 1!

**Online reporting point:**

Available 24/7, anonymous on request, accessible by any internet-enabled device (smartphone laptop, tablet ...) and in several languages

Website: <https://www.malteser-international.org/en/about-us/how-we-work/transparency.html>

A web-based digital safe disclosure system is available 24 hours a day, seven days a week. Reporting persons can submit reports to Malteser International. The system is protected and confidential. It can be used with any internet-enabled device (smartphone, laptop, tablet, etc.) and in several languages. The system can be accessed at the above website.

**Email:**

For SEAH – sexual exploitation, abuse, and harassment:

[GMB MI SEAH@malteser-international.org](mailto:GMB_MI_SEAH@malteser-international.org)

For Fraud and Corruption:

[GMB MI Corruption@malteser-international.org](mailto:GMB_MI_Corruption@malteser-international.org)

It is also possible to submit reports / observations by email either in English or in German via the address given above.

**Postal:**

Malteser International  
Internal Audit / Safeguarding  
Erna-Scheffler-Strasse 2  
51103 Cologne  
Germany

Furthermore, reports can also be sent by post either in English or in German to the above address.

**Personal, face to face:**

For a personal appointment with the safe disclosure responsible at country level, an appointment must be made via the following e-mail addresses, for SEAH – sexual exploitation, abuse, and harassment:

[GMB MI SEAH@malteser-international.org](mailto:GMB_MI_SEAH@malteser-international.org)

for Fraud and Corruption:

[GMB MI Corruption@malteser-international.org](mailto:GMB_MI_Corruption@malteser-international.org)

A safe disclosure can also be made in a personal meeting with the safe disclosure representative at country level after making an appointment.

**External Ombudsperson:**

Dr. Karl Sidhu, LL.M.

Phone: +49 (0)89 2441334-60

Email: [sidhu@svs-legal.de](mailto:sidhu@svs-legal.de)

Address: SvS Rechtsanwalte, Widenmayerstrasse 36, 80538 Munich, Germany

<https://www.svs-legal.de>

Alternatively, an external Ombudsperson, Dr. Karl Sidhu from the law firm SvS in Munich, is available to receive information either in English or in German. The external Ombudsperson is bound by law to secrecy as a lawyer and thus as a person bound by professional secrecy. The external Ombudsperson can be reached via the above contact details.

Finally, all staff members and volunteers can contact their line manager, or higher superior, the national management, the in charge Internal Auditor and Safeguarding as well the Human Resources Department of Malteser International, at any time to report an observation.

If an observation reported internally to Malteser International is not remedied, the reporting person is free to contact an external reporting office. Information on external reporting offices is available on the website of the German Federal Ministry of Justice at [www.bmj.de](http://www.bmj.de).

#### **4. Submission of reports – anonymity**

The submission of reports is not bound to certain forms and may be submitted by individual choice via the reporting points mentioned in [chapter 3](#).

If they wish, reporting persons can submit their reports anonymously through all reporting channels. Nevertheless, we would like to encourage every reporting person to disclose their identity in order to facilitate efficient handling of the report and possibly necessary inquiries into the facts of the case, which serve to uncover the allegation that has been made.

Reports may be submitted in several languages by making use of the online reporting channel and in German and English to the other reporting points mentioned in [chapter 3](#).

Malteser International encourages explicitly that potential violations will be reported in good faith. Thus, we call upon reporting persons to act loyally, and to reflect and respect given laws and Malteser International's given values / principles (cf. Code of Conduct / CoC)

#### **5. Definition of reporting violations and misconduct**

Persons' behaviour related to Malteser International's work may be unethical or an inappropriate conduct or other misconduct that violates Malteser International's internal policies. For such there are specific internal responsibilities and reporting channels and reporting points.

For example, the IT department deals with data breaches whereas for (program related) complaints and feedback a Complaint and Response Mechanism (CRM) is established at the national levels.

Within the framework of this guideline, it should also be possible to report action such as offences that may generally constitute significant misconduct. This may include, among others, offences committed by staff members at the expense of other staff members, beneficiaries, Malteser International as an organization or third parties, and leading to gaining advantages of any kind for the offender, and even offences committed in "good conscience" in order to gain an advantage for Malteser International as an organization.

For example, the following circumstances constitute a potential violation (not exhaustive):

- Sexual exploitation, abuse and sexual harassment (SEAH).
- Any kind of discrimination based on gender, sex, religion, nationality, ethnicity, marriage status, disability, etc.
- Offering or accepting bribes (corruption).
- Fraud, e.g. by manipulating the registers and data of beneficiaries.
- Money laundering or the misappropriation of funds.
- Theft, especially if it is systematic and/or beyond a “de minimis threshold”.
- Unlawful trafficking or unlawful use of illicit substances.
- Acts of violence or the threat thereof.
- Intentional damage to property not actively reported by the damaging party (beyond a “de minimis threshold”).
- Violations of provisions of this guideline which serve to protect the person giving the information, in particular discrimination or threats against persons
  - who have reported a potential violation, and
  - individuals believed to be reporting or to have reported a potential violation.
- Any conduct that does not comply with the MI’s guidelines (e.g. Code of Conduct etc.).
- Any conduct which constitutes a breach of internal accounting rules, accounting standards or accounting controls.
- Violations of data protection regulations, in particular the German General Data Protection Regulation (DSGVO) or the Ecclesiastical Data Protection Regulation of the Religious Community under Papal Law (KDR-OG), such as any intentional, grossly negligent or otherwise inappropriate dissemination of patient data (e.g. pictures via WhatsApp; non-anonymized report on cases to non-affected third parties).
- Disclosure of trade secrets related to MI or other internal or confidential information, the use of which by third parties could cause damage to MI.
- Any attempts to conceal evidence of misconduct listed above.
- Any other misconduct that could significantly harm the reputation, or the organization of MI (including breaches of confidentiality).
- Any violations by suppliers of human rights and environmental due diligence obligations with regard to the German Supply Chain Due Diligence Act (LkSG) and corresponding international legislation, including violations of the Mandatory Principles of Humanitarian Aid Procurement, as well as the prohibition of child and forced labour and the prohibition of disregard for labour and environmental protection legislation.

Also, within Malteser International violations and misbehaviour not exceeding certain margins, a “de minimis threshold” (e.g. taking a Malteser pen for private purposes = theft), are not wanted at all and must be systematically stopped in the future. However, as a rule, for these cases there are likely to be local channels of communication in particular with the human resource in-charge / department and superiors, or program or national management.

## 6. Differentiation from other complaints

The safe disclosure system serves exclusively to receive and process reports on actual or alleged, potential violations of laws, national regulations and all internal rules (e.g. MI CoC) and regulations. It is not intended for general/non-sensitive complaints and feedback (“suggestion box”). For these please use national channels, such as the Complaint and Response Mechanism (CRM).

## 7. Protection of the reporting persons

Any reporting person providing in good faith (bona fide) reports to potential or even actual violations is protected from "retaliations". This also applies to threats and attempts in relation to the report. Retaliations are acts or omissions in connection with a professional activity which are a reaction to a report or disclosure, and which cause or may cause the reporting person to suffer an unfair disadvantage.

Reporting persons are entitled to protection from any adverse treatment if they have plausible reasons to believe that the information they report is correct at the time it is being reported and that the report is not made for extraneous purposes. A report for extraneous purposes is assumed, for example, if the sole intention of the reporting person is to discredit another person for minor or even false violations.

Therefore, only reporting persons acting in good faith are protected.

Reporting persons should therefore only provide information if they believe in good faith that the information provided by them is correct and true.

Reporting persons are not acting in good faith if they know that the reported information is untrue. If there is any doubt, the facts in question must not be presented as a fact, but as an assumption, assessment or statement by other persons.

Persons who intentionally, knowingly or grossly negligent report false or misleading, fraudulent information are accordingly excluded from the scope of protection. It should be noted that a reporting person may be held criminally liable and may also be obliged to make good any damage in case of purposely claiming untrue facts regarding other persons.

Every report must therefore be made in good faith and without fear of retaliations, i.e. without fear of being discriminated against. For the protection of all persons reporting in good faith, Malteser International prohibits any sanctions. See also article 4 of M's CoC.<sup>3</sup>

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<sup>3</sup> See article 4 of the MI Code of Conduct, focusing in particular at PSEAH:

...

- *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 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.*



## 8. Confidentiality

We assure that all reporting persons will be treated confidentially. Since all information, irrespective of its truthfulness, is capable of causing the greatest possible damage to the reputation of the person concerned the reporting person and/or to third parties as well as to Malteser International, it will therefore be treated with particular confidentiality over and above the obligations arising from the applicable data protection laws.

This means that the identity of the reporting person, the identity of the persons who are subject of a report and the identity of other persons named in the report will not be disclosed to any persons other than those who are responsible for receiving the information or for taking any follow-up action.

Derogating from this principle, the identity of a reporting person or other circumstances that allow conclusions to be drawn about the identity of this person may be disclosed on the basis of the circumstances mentioned below:

- in criminal proceedings at the request of the prosecuting authorities.
- on the basis of government judiciary acts such as administrative proceedings, including administrative fine proceedings.
- on the basis of a court decision.

In such cases, the reporting person shall be informed in advance of the disclosure. This shall be dispensed with if the law enforcement agency, the competent administrative authority or the court has informed the respective MI reporting point that such information would jeopardize the corresponding investigations, enquiries or court proceedings.

Furthermore, information about the identity of a reporting person or other circumstances that allow conclusions to be drawn about the identity of this person may be disclosed on the basis of the circumstances mentioned below:

- if follow-up measures are necessary.
- with the consent of the reporting person.

Information on the identity of persons who are the subject of a report and on the identity of other persons named in the report may be disclosed in the following circumstances:

- if consent has been given in this respect.
- by the "reporting points" referred to in chapter 3, to the extent necessary and required in the course of internal investigations.
- if this is necessary for taking follow-up measures. <sup>4</sup>
- in criminal proceedings at the request of the prosecuting authorities.

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• *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.*

<sup>4</sup> E.g. if the person concerned is a potential threat for other staff members, people we work with and third parties.

- based on an order in administrative proceedings, including administrative fine proceedings.
- based on a court decision.

## 9. Documentation of the reports

The persons responsible for receiving reports via one of MI's reporting points (see [chapter 3](#)) shall document all incoming reports in a permanently retrievable manner in compliance with the confidentiality requirement. The reports shall be stored in compliance with the provisions of data protection law for no longer than is necessary and appropriate for the circumstances.

The reporting person shall be given the opportunity to check the documentation, correct it if necessary and confirm it with their signature or in electronic form if the report is not submitted anonymously.

The documentation must be deleted three years after the procedure has been completed. The documentation may be kept longer in order to meet the requirements in accordance to German law (HinSchG; based on the Directive (EU) 2019/1937) or other legal legislation, as long as this is necessary and proportionate.

## 10. Time-bound confirmation of receipt and feedback obligation

The persons responsible for receiving reports via one of MI's reporting points (see [chapter 3](#)) shall acknowledge receipt of a report to the reporting person within seven days at the latest.<sup>5</sup>

Furthermore, the report receivers (see [chapter 3](#)) shall provide a response to the reporting person within three months of the acknowledgement of receipt of the report. However, feedback to the reporting person may only be provided to the extent that it does not affect internal enquiries or investigations and does not affect the rights of the suspected persons or those who are named in the report. As a rule, reporting persons do not receive any feedback on sanctions (especially disciplinary action / labour law measures) that have been taken against other persons. In this respect, it is always necessary to assess in each individual case which information can be communicated to the reporting person at all.

## 11. Definitions / terminology, abbreviations <sup>6</sup>

**CoC:** MI Code of Conduct.

**CRM:** MI Complaint and Response Mechanism.

**Follow-up action:** The action taken by the recipient of a report (= reporting point) to verify the validity of the observations and / or even allegations made in the report and, if necessary, to take action regarding the reported violation, including by means of enquiries, investigations and/or closure of the procedure.

**Information about violations:** Reasonable suspicion or knowledge of actual or potential violations

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<sup>5</sup> The MI CRM, however, sets the target at 72 hours from the date of receiving a report. This particularly applies to "safeguarding" messages / reports via the MI CRM.

<sup>6</sup> In alphabetical order! Cross references are underlined!

that have occurred or are very likely to occur, and of attempts to conceal such violations.

**Infringements:** Acts or omissions within the scope of a professional activity which are directed against laws, legal ordinances, other international regulations as well as directly applicable legal acts of the European Union, internal regulations of MI and voluntary commitments and are therefore unlawful.

**MI:** Malteser International

**Misconduct, significant:** significant misconduct may include, among others, offences committed by staff members at the expense of other staff members, beneficiaries, MI as an organization or third parties, and leading to gaining advantages of any kind for the offender, and even offences committed in "good conscience" in order to gain an advantage for MI as an organization, see chapter 5.

**Person concerned:** A natural or legal person identified in the notification as having committed the breach or with whom the identified person is associated. In other contexts subject of complaint (SoC) might be used as a synonym.

**Professional activity:** current or former work activities and current or former voluntary activities within Malteser International through which persons obtain information about potential violations, regardless of the nature of the activities.

**Report or reporting:** verbal, written or electronic communication of information / observations / hints on infringements to the designated reporting points.

**Reporting channel:** technical system for data handling. as well as MI staff members or departments responsible for receiving reports or taking follow-up action.

**Reporting person:** a natural person who reports information about violations obtained in connection with her or his professional activities or through direct observation. In MI CoC: complainant.

**Reporting point:** MI staff members responsible for receiving reports or external Ombudsperson.

**Retaliations:** Actions or omissions in connection with professional activities which are a reaction to a report and as a result of which the reporting person suffers or may suffer an unjustified disadvantage (e.g. warning, dismissal, reprisal, victimization etc.).

**SDG:** MI Safe Disclosure Guideline.

**SEAH (PSEAH):** (Protection from) Sexual exploitation, abuse and sexual harassment.

**Sensitive and non-sensitive cases and / or complaints:** For the differentiation between sensitive and non-sensitive cases and/or complaints please refer to the MI CoC, which lays out the context of "sensitive cases / complaints as well as the general criteria for handling sensitive cases / complaints (MI CoC, p. 11):

*"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."*

**Subject of complaint (SoC):** see person concerned.

**Violation:** potential violations / breaches of laws, national regulations as well as all internal rules (e.g. MI CoC) and regulations, see chapter 5.

This Safe Disclosure Guideline has been issued by the Secretary General of Malteser International. Cologne, February 23<sup>rd</sup>, 2024

Clemens Graf von Mirbach-Harff  
Secretary General

## Annex: Malteser International - Safe Disclosure Guideline Flyer on 2. reporting persons & 3. reporting points<sup>7</sup>

### Reporting persons

Reporting persons are understood to be natural persons who report or disclose information about violations obtained in connection with their (also voluntary) activities at Malteser International. Not only staff members, volunteers, former colleagues are entitled to report violations, but also project partners, beneficiaries, suppliers, external consultants or other third parties, etc.

The Safe Disclosure Guideline however does not oblige anyone to actually provide information.

### Reporting points

#### For Malteser International staff:

If you believe that the actions of any staff member, or person(s) having to do with Malteser International could constitute significant misconduct, you should report your observations with the responsible person according to the MI CRM. For non-sensitive cases<sup>8</sup>, please inform your line manager in the first place. If you do not feel comfortable speaking to your line manager for any legitimate reason or because you fear negative personal consequences for yourself such as reprisal, victimization, or dismissal, you may instead contact the line manager's superior.

#### For project and business partners, beneficiaries and all other stakeholders:

You should raise your observations with MI's Program or Country Coordinator in charge.

In circumstances where it would be inappropriate to approach either the Malteser International person in charge or their supervisor, you may report your observation directly to MI's headquarters by using the reporting points as mentioned further down in this chapter.

Please always report full details of your observations along with your concern (such as locations, date, time, names, ...) and any available supporting evidence. Please also state whether you wish your identity to be kept confidential.

When addressing a significant misconduct through the reporting points, please give a brief reason why Malteser International managers in charge in the country should not deal with the issue.

For other non-sensitive complaints<sup>9</sup> that do not constitute significant misconduct as described in [chapter 5](#), please refer to MI's Complaint and Response Mechanism (CRM) at national level.

For submitting / reporting information on actual or suspected violations and / or significant misconduct, the following reporting points are available:

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<sup>7</sup> Might be printed separately from the SDG for blackboards and / or hand-outs.

<sup>8</sup> For the differentiation between sensitive and non-sensitive cases and / or complaints please refer to the MI CoC, which lays out the context of "sensitive cases / complaints" as well as the general criteria for handling sensitive cases / complaints and refers to either this SDG or to the (Safeguarding) CRM.

<sup>9</sup> See footnote 7!

**Online reporting point:**

Available 24/7, anonymous on request, accessible by any internet-enabled device (smartphone laptop, tablet, etc.) and in several languages

Website: <https://www.malteser-international.org/en/about-us/how-we-work/transparency.html>

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**Postal:**

Malteser International  
Internal Audit / Safeguarding  
Erna-Scheffler-Strasse 2  
51103 Cologne  
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**Personal, face to face:**

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for SEAH – sexual exploitation, abuse, and harassment:

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[GMB MI Corruption@malteser-international.org](mailto:GMB_MI_Corruption@malteser-international.org)

A safe disclosure can also be made in a personal meeting with the safe disclosure representative at country level after making an appointment.

**External Ombudsperson:**

Dr. Karl Sidhu, LL.M.

Phone: +49 (0)89 2441334-60

Email: [sidhu@svs-legal.de](mailto:sidhu@svs-legal.de)

Address: SvS Rechtsanwaelte, Widenmayerstrasse 36, 80538 Munich, Germany

<https://www.svs-legal.de>

Alternatively, an external Ombudsperson, Dr. Karl Sidhu from the law firm SvS in Munich, is available to receive information either in English or in German. The external Ombudsperson is bound by law to secrecy as a lawyer and thus as a person bound by professional secrecy. The external Ombudsperson can be reached via the above contact details.

Finally, all staff members and volunteers can contact their line manager, or higher superior, the national management, the in charge Internal Auditor and Safeguarding as well the Human Resources Department of Malteser International, at any time to report an observation.

If an observation reported internally to Malteser International is not remedied, the reporting person is free to contact an external reporting office. Information on external reporting offices is available on the website of the German Federal Ministry of Justice at [www.bmj.de](http://www.bmj.de).