



## OZOUGA CHIMPANZEE PROJECT

Ozouga e.V. | Fürstenauer Weg 183,  
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### Ozouga Code of Conduct

The Ozouga Chimpanzee Project is committed to enabling and fostering a safe, respectful and inclusive environment. Upholding ethical, professional and safety standards is of highest importance, and Ozouga Chimpanzee Project expects everyone – including staff and visitors – to act with integrity and respect towards people and nature. The code of conduct was developed by Ozouga staff and researchers<sup>1</sup>. It seeks to ensure ethical and professional norms and outlines policy measures. The code is compulsory for everyone at the Ozouga Chimpanzee Project.

#### **Policy Purpose:**

The Ozouga Chimpanzee Project is committed to fostering working environments that respect the inherent dignity of all persons regardless of their ethnic, religious, social and cultural background or of their sex and gender identity. Our project should be a place in which science and truth always rule over hierarchy, a place which stimulates creativity, productivity, honesty, and well-being for everyone involved. All persons shall receive the opportunity to reach their fullest potential and be empowered to deliver the best possible results. Every person has the right to work in a safe environment, free from harassment, sexual harassment, discrimination and abuse of authority (hereafter: “prohibited conduct”). Everyone at the Ozouga Chimpanzee Project (hereafter: “Ozouga”) has a corresponding responsibility to actively promote such an environment.

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<sup>1</sup>Information and text extracts from the following sources have been used:  
Borneo Nature Foundation International – “Staff Handbook for Employees and Contractors”  
Australian Human Rights Commission – “Workplace discrimination and harassment policy template”  
UN Women - “Prevention of harassment, sexual harassment, discrimination and abuse of authority policy”

**The Ozouga Chimpanzee Project takes the safety and well-being of staff members and visitors seriously. We therefore commit to a zero-tolerance approach to prohibited conduct and take action in response to all complaints received about any behavior that threatens the safety and well-being of staff members and visitors.**

**Scope:**

This policy applies to all persons working at Ozouga or third parties working for/with Ozouga. Everyone interacting in any professional capacity with our project are covered by this policy and Ozouga will not tolerate discrimination, bullying or harassment from staff or third parties. Breach of this policy by Ozouga staff will lead to disciplinary and/or legal proceedings. Details of how Ozouga deals with harassment from outside the project is outlined in the third-party harassment policy. This policy applies to all temporary and permanent workplaces of Ozouga, mainly the field-site in Loango National Park, Gabon, and the offices in Osnabrück, Germany.

If you have any questions or feedback about any of the information covered in this policy, then please talk to the camp manager or the board of directors.

**Staff rights and responsibilities**

**All staff are entitled to:**

- recruitment and selection decisions based on merit and not affected by irrelevant personal characteristics,
- work free from discrimination, bullying and sexual harassment,
- the right to raise issues or to make an enquiry or complaint in a reasonable and respectful manner without being victimised,
- the right to personal liberty and respect for private and family life,
- the right to physical integrity.

**All staff must:**

- follow the standards of behaviour outlined in this policy,
- offer support to people who experience discrimination, bullying or sexual harassment, including providing information about how to make a complaint,
- avoid gossip and respect the confidentiality of complaint resolution procedures,

treat everyone with dignity, courtesy and respect,  
ensure the fitness for duty, and the safety, health and welfare of themselves  
and others in the workplace.

**Managers and supervisors must also:**

model appropriate standards of behaviour,  
take steps to educate and make staff aware of their obligations under this  
policy and the law,  
intervene quickly and appropriately when they become aware of  
inappropriate behaviour,  
act fairly to resolve issues and enforce workplace behavioural standards,  
making sure relevant parties are heard,  
help staff resolve complaints informally,  
investigate informal/formal complaints and report to the board of directors,  
ensure staff who raise an issue or make a complaint are not victimised,  
ensure that recruitment decisions are based on merit and that no  
discriminatory requests for information are made.

**Confidentiality and Data Protection Policy**

All complaints will be treated with the highest diligence and care. No actions  
pertaining to current employment, nor retaliation will be made for the reporting of  
an incident that is thought to be a violation of this code of conduct.

Due to formal regulations, board members working at institutions such as Osnabrück  
University are bound to report complaints to their superiors. Reporting an incident to  
Ozouga e.V.'s Sexual Assault and Harassment Advisor (Dr. Debbie Stoll:  
[saha@ozouga.org](mailto:saha@ozouga.org)) constitutes a first consultation in which all information is treated  
confidentially. A first consultation serves to offer advice on further steps that can be  
taken and the possible consequences these may have so that the reporting person  
can make an informed decision about how they would like to proceed.

Medical information will remain confidential and will only be shared where relevant  
and with the knowledge of the member of staff e.g. where a medical condition may  
affect the abilities of the member of staff to carry out their responsibilities. None of  
this information will be shared with any other staff member.

## **IT/Social Media Policy**

Ozouga encourages team members to share their experiences on social media: It helps to raise awareness of our work, as well as keeping friends and family updated on the adventures. As a member of the Ozouga team you have, however, the responsibility to uphold the organisation's values, and not to bring Ozouga into disrepute. Any member of staff sharing or writing posts with any connections to Ozouga, its work or personnel, is required to follow the following guidelines:

Profile name: Use your own name for your social media profile, never use "Ozouga" as part of your social media name.

Ozouga-branded clothing: When wearing a T-shirt or any other item with the Ozouga logos or names, do not take and/or post photographs showing behaviour that does not comply with the values of Ozouga.

Posting photos of other Ozouga people: Not everyone wants to be on social media, so please ask before posting and/or tagging photos of others and get written proof for the permission (email or WhatsApp-text).

Social life: Please be aware of the (often thin) distinction between private life and project-related posts. Do not post party pictures under Ozouga's name, especially if it involves alcohol or other drug consumption. If you befriend other staff on social media, please be careful with what you post, even if not Ozouga-related. Please bear in mind cultural sensitivities and potential misconceptions amongst friends and family of Ozouga staff members who may view this content.

Politics: Ozouga is politically neutral. Please do not post images or other materials endorsing any political party/ies or candidate/s in association with Ozouga.

Offensive language: Please avoid any offensive language in social media posts or images.

Fun photos in the forest: Having fun is encouraged, but should not involve the wildlife, or give the erroneous impression that Ozouga does not take its forest and conservation work seriously.

If Ozouga becomes aware of an image or post that contravenes any of the above, Ozouga will ask you to take it down and, in more serious cases, may need to pursue

disciplinary action. If you have any concerns or questions, please check with the camp manager or board of directors before posting.

## **Discrimination & Harassment Policy**

### **Discrimination**

Discrimination is treating, or proposing to treat, someone unfavorably because of a personal characteristic protected by the law, such as sex, age, race or disability.

Discrimination can occur:

**Directly**, when a person or group is treated less favorably than another person or group in a similar situation because of a personal characteristic protected by law (see list below).

**Indirectly**, when an unreasonable requirement, condition or practice is imposed that has, or is likely to have, the effect of disadvantaging people with a personal characteristic protected by law (see list below).

### **Protected personal characteristics include:**

a disability, disease or injury, including work-related injury,  
parental status or status as a caregiver, for example, because they are responsible for caring for children or other family members,  
race, color, descent, national origin, or ethnic background,  
age, whether young or old, or because of age in general,  
sex,  
industrial activity, including being a member of an industrial organization like a trade union or taking part in industrial activity, or deciding not to join a union,  
religion,  
pregnancy and breastfeeding,  
sexual orientation, intersex status or gender identity, including gay, lesbian, bisexual, transsexual, transgender, queer and heterosexual,  
marital status, whether married, divorced, unmarried or in a de facto relationship or same sex relationship,  
political opinion,  
social origin,  
medical record,

an association with someone who has, or is assumed to have, one of these characteristics, such as being the parent of a child with a disability.

It is also against the law to treat someone unfavorably because you assume they have a personal characteristic or may have it at some time in the future.

### **Coercion & Bullying**

Coercion is a tactic used to intimidate, trick, or force someone to engage in an activity without physical force.

Bullying is offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient. Bullying can include the use of personal strength or the power to coerce through fear or intimidation, not necessarily from someone in a position of authority. Bullying may be physical, verbal or non-verbal. It can include conduct that is not face-to-face, including via text message, email and social media.

#### ***Behaviors that may constitute bullying include:***

sarcasm and other forms of demeaning language,  
threats, abuse or shouting,  
coercion,  
isolation,  
inappropriate blaming,  
ganging up,  
constant unconstructive criticism,  
deliberately withholding information or equipment that a person needs to do their job or access their entitlements,  
unreasonable refusal of requests for leave, training or other workplace benefits.

### **Sexual Harassment:**

Sexual Harassment is any unwelcome conduct of a sexual nature that results in physical, psychological or sexual harm, that might reasonably be expected or be perceived to cause offence or humiliation. Sexual harassment may occur in the workplace or in connection with work. While typically involving a pattern of

conduct, sexual harassment may take the form of a single incident. Sexual harassment is the manifestation of a culture of discrimination and privilege based on unequal gender relations and other power dynamics. Sexual harassment may involve any conduct of a verbal, non-verbal or physical nature, including written and electronic communications. Sexual harassment may occur between persons of the same or different genders, and individuals of any gender can be either the affected individuals or the alleged perpetrators. Sexual harassment may occur outside the workplace and outside working hours, including during official travel or social functions related to work. Sexual harassment may be perpetrated by any colleague, including a supervisor, a peer or a subordinate. A perpetrator's status as a supervisor or a senior official may be treated as an aggravating circumstance.

***Sexual harassment may occur in many ways and includes but is not limited to the following:***

- Commenting on somebody's appearance that may suggest to them you want sex when they do not, sexual orientation, or gender in a derogatory or objectifying way, or in a way that makes them uncomfortable. Remember that when you are in a position of power, it is more difficult for another person to express that they don't want to do something you want them to do,
- Creating or posting sexually offensive materials in the workplace,
- Sexually suggesting behavior, such as leering or staring,
- Flirting with somebody or pursuing them persistently against their will. These actions can damage a person's professional reputation and expose them to further sexual harassment,
- Using obscene comments, gestures, pranks, and jokes that degrade or offend somebody,
- Sending or displaying sexually explicit (digital) objects or messages,
- Invading somebody's personal space, for example by touching, hugging or brushing up against someone inappropriately,
- Threatening, coercing, stalking, or intimidating somebody to pressure them to engage in sexual acts,
- Accessing sexually explicit internet sites,
- Intrusive questions or statements about a person's private life,

- Proposing, demanding, or insinuating sexual favors,
- Unwanted or unwelcome touching of a sexual nature, including hugging, kissing, fondling, oral sex, anal or vaginal intercourse, or other physical sexual activity that occurs without valid consent is sexual assault.

Ozouga stresses that any information of sexual assault or of any behavior that may be considered to be an offence under criminal law, such as physical assault, indecent exposure, stalking or obscene communications, will be forwarded to the responsible authorities for legal proceedings. Sexual assault includes any form of unwanted sexual contact obtained without consent and/or obtained by force, threat of force, intimidation, or coercion.

Ozouga recognizes that comments and behaviour that do not offend one person can offend another. This policy requires all staff and volunteers to respect other people's limits. If a person does not object to inappropriate behaviour in the workplace, it does not mean that they are consenting.

### **Victimisation / Anti-Retaliation Policy**

Victimisation is subjecting or threatening to subject someone to a detriment because they have asserted their rights under equal opportunity law, made a complaint, helped someone else make a complaint, or refused to do something because it would be discrimination, sexual harassment or victimisation even if their complaints are proven unfounded by an investigation. Victimisation is against the law.

It is also victimisation to threaten someone (such as a witness) who may be involved in investigating an equal opportunity concern or complaint. This policy is designed to ensure that all individuals working with Ozouga feel comfortable to report when they see or suspect harassment without fear of retaliation.

### **Gossip**

It is unacceptable for staff at Ozouga to talk with other staff members, clients or collaborators about any complaint of discrimination or harassment.

Breaching the confidentiality of a formal complaint investigation or inappropriately disclosing personal information obtained in a professional role (for



example, as a manager) is a serious breach of this policy and may lead to formal discipline.

**If you experience any of these behaviors, or if you witness them being done to others, you should take action!**

### **Breaches of this Policy**

Bullying and harassment are not tolerated at Ozouga and all staff are required to treat each other, along with our collaborators and visitors, with dignity and respect.

Breaches of this policy will be subject to disciplinary actions as outlined in this policy. Upon receipt of a complaint related to bullying or harassment, your camp manager, or Sexual Assault and Harassment Advisor will instigate an investigation. Every effort will be made to achieve prompt resolution to the complaint, and both the complainant and the person who is the subject of the complaint will be expected to cooperate in achieving that result. All parties have the right to be accompanied and supported at any meeting held under this procedure. If Ozouga considers that there is sufficient evidence to suggest harassment or bullying has taken place, appropriate action will be taken, including disciplinary actions up to dismissal from the project.

Being under the influence of alcohol, illegal drugs or otherwise intoxicated is not an excuse for harassment and may be regarded as an aggravating factor. The alleged original or actual intentions or motives of behaviours cannot be used to excuse behaviour that is experienced as harassment or bullying.

Making a false allegation deliberately and in bad faith will be treated as misconduct and subject to disciplinary actions. Individuals are in no way indemnified from third party legal action arising from intentionally false reports.

### **Reporting breaches of Conduct**

If you have observed or experienced one of the behaviors above or feel that you are being harassed, you may feel able to approach the person in question informally, either on your own or with the support of a colleague, to advise the offender that his or her behavior is unwelcome and request that it is stopped. The project does not wish to be prescriptive as to the form of any such action that the complainant or the person who is the subject of the complaint may wish to make.

If you do not feel that informal steps are appropriate given the nature of the complaint, or they have been unsuccessful, you should initiate the complaint process formally by reporting the case (verbally but preferentially written) to **one** of the following parties or anonymously on the website: ozouga.org

the camp manager [Erwan Theleste: [erwantheleste@yahoo.fr](mailto:erwantheleste@yahoo.fr)]

the board members [Christoph Deutsch: [cd@ozouga.org](mailto:cd@ozouga.org); Prof. Dr. Simone Pika: [sp@ozouga.org](mailto:sp@ozouga.org), Claudia Collet-Herf: [cch@ozouga.org](mailto:cch@ozouga.org)]

the Sexual Assault and Harassment Advisor of the Ozouga e.V. (Dr. Debbie Stoll: [saha@ozouga.org](mailto:saha@ozouga.org)), or

another person at Ozouga whom you trust, such as a staff member or student who has been there for longer than you have and who can support the complaint process or at least document the incident.

The report should provide full details and be accompanied with any documentary evidence relating to the complaint.

***Specifically, it should set out as clearly and succinctly as possible***

the nature of the behaviour that you are concerned about;

details about when and where the behaviour occurred;

the effect of this behaviour on you or others; and

the resolution you or others are seeking.

Also, if possible, but not compulsory, the complaint should include dates and details of any other witnesses to any incidents referred to in the complaint, together with any documentary evidence provided by the witnesses.

All complaints will be treated with the highest diligence and care. No actions pertaining to your current employment, nor retaliation will be made for the reporting of this incident that you think may have violated the code of conduct. Even if you think something is not very serious but it makes you or someone else uncomfortable, we strongly advise you to inform the project manager and the directors so that steps can be taken to guarantee the safety of all employees.

Complaints should be formally submitted by email or – in pdf format – using WhatsApp. A complaint can be communicated to the appropriate recipient (e. g., camp manager) in person, via phone or in informal writing before submitting a complaint officially.

Following written consent from the person(s) lodging the complaint, a copy of all written documents handed in with the complaint(s) will be sent to the Sexual Assault and Harassment Advisor for information.

Harassment frequently involves interactions between individuals that are not witnessed by others, which often means reports of harassment cannot be substantiated by additional evidence. However, lack of corroborating evidence or 'proof' should not discourage individuals from reporting harassment under this policy.

Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.

If you do not know whether or how to proceed concerning sexual assault, please contact the Sexual Assault and Harassment Advisor, Dr. Debbie Stoll [[saha@ozouga.org](mailto:saha@ozouga.org)], or the ProBeweis network <https://www.probeweis.de/en/>. The ProBeweis network offers help and support in the event of domestic and /or sexual assault and guides you in documenting the evidence independently of a report made to the police. This ensures that you still have the option of taking action against the perpetrator later on should you decide to do so.

There may be circumstances in which an aggrieved party is not willing, or able, to make a formal complaint but the Ozouga considers that the implications for the aggrieved person or others actually or potentially affected, are serious. In this case, the Ozouga board of directors will consult, and may initiate an investigation and make a decision on further action on the basis of such evidence as is available.

### **Zero-tolerance approach**

The Ozouga Chimpanzee Project commits to a zero-tolerance approach to prohibited conduct and takes action in response to all complaints to ensure the safety and well-being of staff members and visitors.

If you see something happen to someone else, here are ways you can help:

Intervene directly, in-the-moment, if you feel comfortable, confident and safe to do so, e.g. by taking action to stop someone from harming someone else, by helping the person harmed to get away, by reminding people involved of this code of conduct etc.

Intervene indirectly, in-the-moment: e.g. by distracting people, by announcing your presence, by calling help etc.

Delegate: if you do not feel comfortable intervening yourself, tell someone who you think would be good at talking with the violator, or the person they harm (e.g., friend of theirs, camp manager, supervisor).

Follow up with the person harmed, after the incident: seek them out and talk to them about how they feel about what happened.

### **Investigation Process**

Your complaint will be documented and the investigation process started within seven days after receiving the complaint. The purpose of an investigation is to establish the relevant factual evidence in connection with the allegation(s) made by the complainant. Wherever possible, the investigator should not have had previous involvement with the issues in the case. The investigation should be concluded as soon as is reasonably practicable. The investigator will prepare a report and may, if specifically requested to do so by Ozouga, make recommendations on possible courses of action.

Depending on the outcome of the investigation, legal actions may be taken to prosecute the perpetrator.

### **Documentation - Ozouga will:**

Record the dates, times, location, names and circumstances of the incident from the complaint filed and store this information safely and with restricted access<sup>2</sup>.

Ensure that all parties are aware and informed about the reporting and investigation process of the allegation.

Non-legal cases will be investigated informally by Ozouga and every step documented.

In potential legal cases, Ozouga will ensure to forward the complaint and all information acquired to the responsible authorities and support the investigation process in every possible way.

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<sup>2</sup>OCP will treat any personal information confidential and follow the European GDPR.

In every potential legal case, Ozouga will follow the instructions of the responsible authorities and will dismiss the alleged offender for the time of the investigation until the case is formally closed. If the responsible authorities deny a legal prosecution based on the given information and evidence, the case will be resolved using the procedure decided by the Ozouga board.

***Based on the above, Ozouga will follow the following procedures to handle a case in which no formal police and legal action is taken:***

- the alleged offending party will be contacted and a meeting will be set up during which the complaint will be presented, the defense statement will be documented and the alleged offending party will be demanded to stop any alleged behavior,
- witnesses will be contacted and their statements will be documented,
- the circumstances will be investigated and any relevant information or evidence will be documented,
- an investigation report will be compiled,
- depending on the type of prohibited conduct and only in agreement with the complainant, mediation sessions with the complainant and the alleged offender will be arranged to resolve the issue,
- suitable solutions for each party will be developed in order to enable work and life to continue in the work environment formally acknowledged by each party. This is especially important if/as long as no mediation meeting took/has taken place,
- All parties involved in the complaint have the right to be accompanied and supported by a representative or by a colleague of his/her choice from within Ozouga at any meeting held under this procedure. These people must maintain appropriate confidentiality.
- Those interviewed in the course of any investigation will be asked to review the notes of their individual discussions with the investigator as soon as is reasonably possible to comment on any inaccuracies or omissions,
- Ozouga will file and retain any pertinent notes and documents related to a complaint, all of which must be held in confidence.

Ozouga will decide after the investigation how to proceed and will inform the parties in writing, particularly of:

- the conclusions reached after reviewing all evidence, including any investigation report;
- the action that Ozouga intends to take; and
- the reasons for any such action.

In cases where the claim(s) of harassment are considered to be unfounded and where there is a continuing relationship between the parties, Ozouga will take no further action, other than, where appropriate, implementing or suggesting steps that would help to restore reasonable working relationships between the parties. If the evidence does not support a claim of harassment but it is clear that either party has demonstrated behaviours that are likely to lead to further issues between them if unresolved, Ozouga may implement means to ensure and restore the ongoing work relationship.

### **Penalties for violating the Code of Conduct:**

If there is sufficient evidence to support allegations of harassment of a sufficiently serious nature, disciplinary proceedings will be implemented. Employees who are found guilty of non-legal cases of discrimination, bullying or sexual harassment the first time may:

- be demoted,
- receive a written warning,
- be suspended,
- get a negative performance review,
- be denied promotions and/or salary increases for twelve months.

We will dismiss repeat offenders after a **second** offense.

Any employee found guilty of sexual assault or other prohibited conduct that falls under criminal law will be dismissed with immediate effect and has to leave the field-site, if stationed there, immediately and in addition to the legal consequences of their behavior.

**Support Structures for concerned persons:**

Ozouga offers survivors of sexual harassment the following support structures:

- guidance from the project's Sexual Assault and Harassment Advisor [Dr. Debbie Stoll: [saha@ozouga.org](mailto:saha@ozouga.org)] to determine possible actions,
- access to emergency counseling,
- redefining work responsibilities and tasks to allow the survivor to leave the project or field-site without professional disadvantages.

I have read, understood, and agree to abide by this policy.

[Employee Name]:

Signed:

Date:

**Ozouga Chimpanzee Project**