

STELLA ADLER STUDIO OF ACTING

Title: Sexual Misconduct, Relationship Violence, and Stalking Policy and Policy on Consensual Intimate Relationships

Effective Date: August 23, 2018

Responsible Officers: Luis-Daniel Morales, Director of Conservatory Programs
Angela Vitale, Associate Artistic Director

I. STATEMENT OF POLICY

The Stella Adler Studio of Acting (“the Studio”) including the Art of Acting Studio, seeks to maintain a safe learning, living, and working environment. To that end, this policy prohibits Sexual Misconduct, which includes Sexual or Gender-Based Harassment, Sexual Assault, and Sexual Exploitation. This policy also prohibits Relationship Violence, Stalking, and Retaliation against an individual for making a good faith report of conduct prohibited under this policy. These prohibited forms of conduct are unlawful, undermine the character and purpose of the Studio, and will not be tolerated. The following also incorporates the Studio’s policy on consensual intimate relationships.

The Studio adopts this policy with a commitment to: (1) preventing Sexual Misconduct, Relationship Violence, Stalking, and Retaliation (together, “Prohibited Conduct”); (2) fostering a community in which such conduct is not tolerated; (3) cultivating a climate where all individuals are well-informed and comfortable in reporting Prohibited Conduct; and (4) identifying the standards by which violations of this policy will be evaluated. This policy defines Prohibited Conduct; outlines available resources and reporting options available to students and employees; and references the applicable investigative and disciplinary procedures. The Studio will take prompt and equitable action to eliminate Prohibited Conduct, prevent its recurrence, and address its effects. The Studio also conducts prevention, awareness, and training programs for students and employees to facilitate the goals of this policy.

The Studio does not discriminate on the basis of sex or gender in its education or employment programs and activities. This policy is designed to comply with all applicable legal requirements including federal requirements and New York State and City human rights laws. Other forms of discrimination, including discrimination based on race, religion, and disability, as well as any other form of sex-based discrimination not covered by this policy, are addressed by the Stella Adler Studio of Acting’s Non-Discrimination and Anti-Harassment Policy and Complaint Procedures for Students.

This policy applies to all Prohibited Conduct occurring on or after the effective date of this policy. In the case of Prohibited Conduct occurring before the effective date of this policy where either (a) the report of such Prohibited Conduct is made on or after the effective date of this policy or (b) the report was made before the effective date of this policy but the report has not resolved as of the effective date of the policy, the issue of whether there was a violation of the Studio policy will be determined under the policy or policies in effect at the time the conduct occurred but the procedures under this policy will apply (except that the procedures in effect immediately prior to the effective date will apply where a hearing had been scheduled prior to the effective date).

II. TO WHOM THE POLICY APPLIES

This policy applies to the Stella Adler Studio of Acting students (“Students”); Studio employees, including faculty and visiting faculty, professional staff, and administrators (“Employees”); contractors, vendors, or other third parties within the Studio’s control (“Third Parties”); and visitors or guests of the Studio (together, “Covered Persons”). This policy pertains to acts of Prohibited Conduct committed by Students, Employees and Third Parties when:

- (1) the conduct occurs on the Studio premises;

- (2) the conduct occurs in the context of a Studio employment or education program or activity;
- (3) the conduct occurs outside the context of a Studio employment or education program or activity, but (i) has continuing adverse effects on Studio premises or in any Studio employment or education program or activity or (ii) occurs in close proximity to the Studio premises and is connected to violative conduct on the Studio premises.

New York University (“NYU”) students who participate in Stella Adler Studio of Acting classes or programs are subject to the NYU Policy on Sexual Misconduct, Relationship Violence, and Stalking, the Policy on Consensual Intimate Relationships, and all other applicable policies. NYU students who wish to make a complaint regarding Sexual Misconduct, Relationship Violence, and Stalking should follow the procedures identified in the NYU Policies. The Studio is committed to cooperating fully with NYU in any investigation that is undertaken with respect to NYU students participating in its programs.

III. APPLICABLE PROCEDURES UNDER THIS POLICY

The specific investigative and disciplinary procedures for Prohibited Conduct under this policy are based on the status of the Respondent. In all circumstances, the applicable procedures are guided by the principles of fairness and respect for a Complainant and a Respondent. The Studio applies the preponderance of the evidence standard when determining whether this policy has been violated.

IV. PROTECTIVE MEASURES AND ACCOMMODATIONS:

Upon receipt of a report involving a Student or Employee Complainant, the Studio will take and/or make available reasonable and appropriate measures to protect the Complainant and the Complainant’s access to the Studio employment or education programs and activities, prevent retaliation, and avoid an ongoing hostile environment, which may include protective measures before the final outcome of an investigation. Such protective measures and accommodations, which may be temporary or permanent, may include separation orders, residence modifications, academic accommodations or assistance, work schedule modifications, transportation assistance, and other reasonable and appropriate measures. Reasonable and appropriate protective measures and accommodations are available for Student and Employee Complainants regardless of whether an investigation under the applicable procedures is pursued. The Studio also will take and/or make available such measures and accommodations for Student and Employee Respondents where reasonable and appropriate under the circumstances. The Studio will maintain the privacy of any accommodations or protective measures provided under this policy to the extent practicable.

For Third Party Complainants, the Studio will provide reasonable protective measures as appropriate and available, based on consideration of the role of the Third Party and the nature of any contractual relationship with the Studio.

Violating the terms of a protective measure, including but not limited to no contact, persona non grata, or other behavior-related directives, is a violation of this policy and will subject the person who violates the protective measure to additional charges and sanctions under this policy. The Responsible Officer(s) will determine and identify the appropriate procedures to be followed for such a violation depending on the timing and circumstances of the reported violation.

A. PRIVACY:

The Studio is committed to protecting the privacy of Covered Persons involved in a report under this policy. The Studio also is committed to providing assistance to help Covered Persons make informed choices. With any report under this policy, the Studio will make reasonable efforts to protect the privacy interests of Covered Persons involved in a manner consistent with the need for a careful assessment of the allegation and reasonable steps available to eliminate the reported conduct, prevent its recurrence, and address its effects.

Privacy generally means that information related to a report of misconduct will be shared with a limited circle of individuals who “need to know” in order to assist in the active review, investigation, resolution of the report, and related issues. All Studio employees who are designated as Responsible Officers receive specific training and guidance about safeguarding private information in accordance with applicable laws.

The privacy of Student education records will be protected in accordance with the Studio’s compliance with Family Educational Rights and Privacy Act (FERPA). The privacy of an individual’s medical and related records generally are protected in the United States by the Health Insurance Portability and Accountability Act (HIPAA), excepting health records protected by FERPA.

Any complaint brought by a NYU student to Studio administrators or faculty will be reported to NYU. The Studio can offer the student privacy, but not confidentiality as the Studio is obligated to report all complaints to NYU.

Laws in other relevant jurisdictions may provide additional privacy protections.

B. ENFORCEMENT

A Student or Employee determined by the Studio to have committed an act of Prohibited Conduct in violation of this policy is subject to disciplinary action, up to and including separation from the Studio. Third Parties who violate this policy may have their relationship with the Studio terminated and/or their privilege of being on Studio premises withdrawn. The Studio reserves the right to take action against a Covered Person who commits an act of Prohibited Conduct outside the scope of this policy.

C. REPORTING:

The Studio strongly encourages Covered Persons who become aware of an incident of Prohibited Conduct to report the incident to the Studio Responsible Parties and to local law enforcement by contacting 911 (or equivalent in other jurisdictions).

Employees should ordinarily direct reports of a violation of this policy to the Responsible Parties or, alternatively, employees may direct reports to their supervisors. Employees should choose whichever individual they feel more comfortable contacting under the circumstances. Employees should report the conduct regardless of the offender’s position at the Studio and should also report the conduct even if the offender is not employed at the studio (for example, a vendor or consultant). Prompt reporting is very important so that the Studio can take action to stop the conduct before it is repeated. All reports will be followed up promptly, with further investigation conducted where needed to confirm facts or resolve disputed facts.

There is no time limit on reporting violations of this policy, although the Studio’s ability to respond may be limited as evidence may be less available and memories may fade, and Respondents may no longer be affiliated with the Studio.

Student Amnesty Policy: The health and safety of every student at the Studio is of utmost importance. The Studio recognizes that Students who have been drinking and/or using drugs (whether such use is voluntary or involuntary) at the time that violence, including but not limited to Relationship Violence, Stalking, or Sexual Assault, occurs may be hesitant to report such incidents due to fear of potential consequences for their own conduct. The Studio strongly encourages Students to report incidents of Prohibited Conduct to Studio officials. The Studio will not subject a bystander, Complainant, or other individual making a report who discloses any incident of Prohibited Conduct to the Studio’s officials or law enforcement to disciplinary action for violations of alcohol and/or drug use policies occurring at or near the time of the commission of the Prohibited Conduct.

Bad faith reports: Submitting a false report or providing false or misleading information in bad faith or with a view to personal gain in connection with an incident of Prohibited Conduct is prohibited and subject to disciplinary sanction. This provision does not apply to reports made or information provided in good faith, even if the facts alleged in the report are determined not to be accurate.

VII. PROHIBITED CONDUCT UNDER THIS POLICY

Conduct under this policy is prohibited regardless of the sexual orientation, gender, gender identity, or gender expression of the Complainant or Respondent. Prohibited Sexual Misconduct includes the following specifically defined forms of behavior: Sexual or Gender-Based Harassment, Sexual Assault, and Sexual Exploitation. Also prohibited are Relationship Violence, Stalking, and Retaliation.

Whether a Covered Person has violated this policy is determined based on all of the available facts and circumstances including but not limited to: statements of the Complainant and Respondent; statements by any witnesses to the alleged incident(s); documentary or physical evidence; the presence or absence of corroborating information; and relevant information about pre-and post-incident behavior and/or actions.

A. Sexual or Gender-Based Harassment: Sexual Harassment is any unwelcome sexual advance, request for sexual favors, or other unwanted conduct of a sexual nature, whether verbal, non-verbal, graphic, physical, or otherwise, when one or more of the following conditions are present:

- (i) Submission to or rejection of such conduct is either an explicit or implicit term or condition of an individual's employment or advancement in employment, evaluation of academic work or advancement in an academic program, or basis for participation in any aspect of a Studio program or activity (quid pro quo);
- (ii) Submission to or rejection of such conduct by an individual is used as the basis for decisions affecting the individual (quid pro quo); or
- (iii) Such conduct has the purpose or effect of unreasonably interfering with an individual's learning, working, or living environment; in other words, it is sufficiently severe, pervasive, or persistent as to create an intimidating, hostile or offensive learning, working, or living environment under both an objective - a reasonable person's view - and subjective - the Complainant's view - standard (hostile environment).

Examples of such conduct include, but are not limited to:

Unwelcome sexual flirtations, advances or propositions;

Inappropriate touching of an individual's body;

Graphic verbal comments about an individual's body or appearance;

Sexually degrading words used to describe an individual; and/or

The use of Studio computers (including via the Internet) or the Studio's e-mail system to display or distribute sexually explicit images, messages, or cartoons.

Gender-Based Harassment includes harassment based on gender, sexual orientation, gender identity, or gender expression, which may include acts of aggression, intimidation, or hostility, whether verbal or non-verbal, graphic, physical, or otherwise, even if the acts do not involve conduct of a sexual nature.

Examples of conduct that may constitute Sexual or Gender-Based Harassment include but are not limited to:

Sexual Assault, Sexual Exploitation, Relationship Violence, or Stalking as defined by this policy;

Physical conduct, including unwelcome touching or sexual advances within the working, living, or learning environment;

Verbal conduct, including lewd or sexually suggestive comments, jokes, or innuendoes or unwelcome comments about an individual's sexual orientation or gender identity; or

Written conduct, including letters, notes, or electronic communications containing comments, words, jokes, or images that are lewd or sexually suggestive or relate in an unwelcome manner to an individual's sexual orientation or gender identity.

Sexual or gender-based harassment does not require intent to offend. Thus, inappropriate conduct or language meant as a joke, a prank, or even a compliment can lead or contribute to harassment. Sexual or gender-based harassment may violate applicable laws, including federal, state, and local laws.

Additional rules apply to individuals with supervisory authority at the Studio. No one with a supervisory role may at any time: (1) threaten or imply that an individual's submission to or rejection of a sexual advance, or harassment or discrimination based on any other protected category, will in any way influence any decision regarding that individual's employment, performance evaluation, advancement, compensation, assignments, discipline, discharge, or any other term or condition of employment; or (2) make any employment decision concerning an individual on any discriminatory basis.

B. Sexual Assault: Sexual Assault means Non-Consensual Sexual Intercourse or Non-Consensual Sexual Contact as defined below.

1. **Non-Consensual Sexual Intercourse:** Non-Consensual Sexual Intercourse is having or attempting to have sexual intercourse with another individual (i) by force, threat of force, or coercive conduct; (ii) without affirmative consent; or (iii) where that individual is incapacitated. Sexual intercourse includes anal, oral or vaginal penetration, however slight, with a body part (e.g., penis, finger, hand or tongue) or an object.
2. **Non-Consensual Sexual Contact:** Non-Consensual Sexual Contact is having or attempting to have sexual contact with another individual (i) by force, threat of force, or coercive conduct; (ii) without affirmative consent; or (iii) where that individual is incapacitated. Sexual contact includes touching, fondling or other intentional contact with the breasts, buttocks, groin, or genitals (over or under an individual's clothing) for purposes of sexual gratification or when such private body parts are otherwise touched in a sexual manner.

C. Sexual Exploitation: Sexual Exploitation refers to specific forms of Sexual Misconduct that involve non-consensual use of another individual's nudity or sexuality, excluding behavior that constitutes one of the other Sexual Misconduct offenses.

Examples of Sexual Exploitation include but are not limited to:

Voyeurism (such as watching or taking pictures, videos, or audio recordings of another person engaging in a sexual act, in a state of undress, or in a place and time where such person has a reasonable expectation of privacy, such as a changing room, toilet, bathroom, or shower, each without the affirmative consent of all parties);

Disseminating, streaming, or posting pictures or video of another in a state of undress or of a sexual nature without the person's affirmative consent;

Administering alcohol or drugs to another person for the purpose of making that person vulnerable to non-consensual sexual activity;

Exposing one's genitals to another person without affirmative consent;

Prostituting another individual; or

Knowingly exposing another individual to a sexually transmitted infection or virus without the other individual's knowledge.

- D. Relationship Violence:** Relationship Violence refers to any act of violence or threatened act of violence against a person who is, or has been involved in a sexual, dating, domestic, or other intimate relationship with that person, or who shares a child in common with that person. Relationship Violence commonly involves violence and abuse committed by a person to exert power and control over a current or former intimate partner. Relationship Violence may include acts of Sexual Misconduct, Physical Assault, Sexual Exploitation, or Stalking.

As used here, Physical Assault means threatening or causing physical harm or engaging in other conduct that threatens or endangers the health or safety of any person under circumstances that reflect a direct connection to the intimate relationship in question.

- E. Stalking:** Stalking occurs when a person engages in a course of conduct toward another person under circumstances that would cause a reasonable person to fear bodily injury or experience substantial emotional distress.

Course of conduct means two or more acts including but not limited to unwelcome acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property. Substantial emotional distress means significant mental suffering or anguish.

Stalking includes the concept of cyber-stalking, a particular form of stalking in which electronic media such as the internet, social networks, blogs, cell phones, texts, or other similar devices or forms of contact are used.

- F. Retaliation:** Retaliation means any adverse action taken against an individual for making a good faith report of Prohibited Conduct or participating in any investigation or proceeding under this policy. Retaliation includes threatening, intimidating, harassing or any other conduct that would discourage a reasonable person from engaging in activity protected under this policy.

The Responsible Parties will determine and identify the appropriate procedures to be followed for an allegation of Retaliation depending on the timing and circumstances of the allegation.

RELATED DEFINITIONS: CONSENT, FORCE, AND INCAPACITATION:

- A. Affirmative Consent:** Affirmative Consent is a knowing, voluntary, and mutual decision among all participants to engage in sexual activity. Affirmative consent can be given by words or actions, as long as those words or actions create clear permission regarding willingness to engage in the sexual activity. Silence or lack of resistance, in and of itself, does not demonstrate consent. The definition of consent does not vary based upon a participant's sex, sexual orientation, gender identity, or gender expression.

Consent cannot be obtained: (1) through the use of force or coercion; or (2) by taking advantage of the incapacitation of another individual. Consent also cannot be given by someone who is under the legal age to consent in the applicable jurisdiction at the time of an incident.

In evaluating whether affirmative consent was given, consideration will be given to the totality of the facts and circumstances, including but not limited to the extent to which a Complainant affirmatively gives words or actions indicating a willingness to engage in sexual activity; whether a reasonable person in the Respondent's position would have understood such person's words and acts as an expression of consent; and whether there are any circumstances, known or reasonably apparent to the Respondent, demonstrating an incapacity to consent.

Relying solely on nonverbal communication may result in a violation of this policy. It is important not to make assumptions; if confusion or ambiguity arises during a sexual interaction, it is essential that each participant stops and clarifies, verbally, the willingness to continue.

Consent may be initially given, but withdrawn at any time. When consent is withdrawn or can no longer be given, sexual activity must cease. Prior consent does not imply current or future consent; consent to any sexual act or prior consensual sexual activity does not necessarily constitute consent to any other sexual act. Even in the context of an ongoing relationship, consent must be freely sought and given for each instance of sexual activity.

- B. Force or Coercion:** Force is the use or threat of physical violence or intimidation to overcome an individual's freedom of will to choose whether or not to participate in sexual activity. There is no requirement that a party resists the sexual advance or request, but resistance will be viewed as a clear demonstration of non-consent.

Coercion is conduct, including intimidation and express or implied threats of physical, emotional, or other harm, that would reasonably place an individual in fear of immediate or future harm and that is employed to overcome the individual's freedom of will and to compel the individual to engage in sexual activity.

- C. Incapacitation:** An individual who is incapacitated lacks the ability to knowingly choose to participate in sexual activity or make informed, rational judgments and thus cannot consent to sexual activity. Incapacitation is defined as the inability, temporarily or permanently, to give consent because an individual is mentally and/or physically helpless, being involuntarily restrained, asleep, unconscious, or unaware that sexual activity is occurring. Mentally helpless means a person is rendered temporarily incapable of appraising or controlling one's own conduct. Physically helpless means a person is physically unable to communicate unwillingness to an act.

Where alcohol or other drugs are involved, incapacitation is a state beyond drunkenness or intoxication. The impact of alcohol and other drugs varies from person to person; however, warning signs that a person may be approaching incapacitation may include slurred or incomprehensible speech, vomiting, unsteady gait, combativeness, or emotional volatility. Evaluating incapacitation also requires an assessment of whether a Respondent knew or should have been aware of the Complainant's incapacitation based on objectively and reasonably apparent indications of impairment when viewed from the perspective of a sober, reasonable person in the Respondent's position. Being intoxicated or impaired by drugs or alcohol is never an excuse for committing Prohibited Conduct and does not diminish one's responsibility to obtain informed and freely given consent. In other words, consent is required regardless of whether the person initiating the act is under the influence of drugs and/or alcohol.

IX. VIOLATIONS OF LAW:

Behavior that violates this policy also may violate the laws of the local jurisdiction in which the incident occurred and subject a Respondent to criminal prosecution by the presiding authority.

The New York State Penal Code describes prohibited Sex Offenses in §§ 130.00 to 130.91 and 130.95 to 130.96 and prohibited Stalking Offenses in §§ 120.45–120.60. Covered Persons studying, working, or engaging in other activities at the Art of Acting Studio or other locations outside of New York State are governed by the applicable laws, including California state and local laws, regarding sexual assault and other criminal offenses implicated by this policy. Covered Persons may also be subject to other federal, state, or local laws, as applicable.

Behavior that violates this policy also may subject a Respondent to civil liability. Records of Studio proceedings under this Policy may be subpoenaed in connection with a criminal prosecution and/or civil litigation.

X. STUDENTS' BILL OF RIGHTS:

Under this policy, all students and any other Complainant have the right to:

1. Make a report to local law enforcement and/or state police.
2. Have disclosures of Relationship Violence, Stalking, and Sexual Assault treated seriously.
3. Make a decision about whether or not to disclose a crime or violation and participate in the Studio's disciplinary process and/or the criminal justice process free from pressure by the Studio.
4. Participate in a process that provides due process—i.e., one that is fair, impartial, and provides adequate notice and a meaningful opportunity to be heard.
5. Be treated with dignity and to receive from the Studio a courteous, fair, and respectful response to an allegation.
6. Be free from any suggestion that the Complainant is at fault when these crimes and violations are committed, or should have acted in a different manner to avoid such crimes or violations.
7. Describe the incident to as few Studio or, as applicable New York University, representatives as practicable and not be required to unnecessarily repeat a description of the incident.
8. Be reasonably protected from Retaliation by the Studio, any student, the Respondent, and/or their friends, family and acquaintances within the Studio's jurisdiction.
9. Access to at least one level of appeal of a determination in matters involving Student conduct.
10. Be accompanied by an advisor of choice who may assist and advise a Complainant or Respondent throughout the disciplinary process including during all meetings and hearings related to such process.
11. Exercise civil rights and practice of religion without interference by the investigative or disciplinary process of the Studio.

XI. CONSENSUAL RELATIONSHIPS:

Entering into a sexual, dating or romantic relationship (“Intimate Relationship”) when one individual has power or authority over the other may compromise freely given consent, put the academic and professional development of the individuals at risk, and seriously undermine the foundation of trust, fairness and integrity

that is essential to the Studio's mission. Faculty, administrators, and others who educate, supervise, evaluate, employ, counsel, coach or otherwise make decisions or recommendations as to the other person in connection with their employment or education at the Studio, or who otherwise have actual or apparent authority over a student or subordinate, should understand the fundamentally asymmetrical nature of the relationship. In the context of the Studio's educational and employment context, Intimate Relationships in circumstances where one individual has greater power or authority over another individual may raise sexual harassment concerns and can create perceptions of favoritism and preferential treatment. Such relationships are prohibited.

Intimate Relationships between the following individuals are specifically prohibited:

- A faculty member and a student;
- An academic or faculty advisor and an advisee;
- A member of staff, whether full-time, part-time, or adjunct, and a student;
- A teaching assistant and a student in the teaching assistant's class;
- A director and student-actor;
- A manager/supervisor and an employee over whom they have supervisory authority.

This list is not exhaustive; other circumstances in which one individual has greater power or authority over another may also violate this policy. In the employment context, supervisory authority means the ability to affect or impact an employee's terms, conditions, or privileges of employment because the manager or supervisor can take or impact action such as hiring, firing, promoting, disciplining, scheduling, training, or deciding how to compensate that employee.

If individuals already in an Intimate Relationship foresee the possibility of entering into a relationship of power or authority (for example, through one party enrolling in a program or a class, or taking up a new position), or where an Intimate Relationship arises in the context of an existing relationship of power or authority, the individual with supervisory, evaluative or other position of authority and power must notify the relevant supervisors immediately. The relevant supervisor shall have the authority, in consultation with the Artistic Director and the Responsible Officers, to set reasonable conditions to eliminate both the substance and appearance of conflict of interest or abuse of power or authority; to prevent the establishment of direct authority; to minimize and attenuate indirect authority; or to grant an exception to the policy; provided, however, that exceptions will be granted only in extenuating and extraordinary circumstances. The relevant supervisor may also take measures to prevent the deprivation of educational or employment opportunities for the student or subordinate, and will have the authority, in consultation with the Artistic Director and the Responsible Officers, to make exceptions to normal academic rules and policies as warranted by the circumstances.

Although it is recognized that the student or subordinate may be a full and willing participant in an Intimate Relationship, both the responsibility for adhering to this policy and the consequences for violating it fall upon the person in a position of power or authority, rather than the student or subordinate. Violations of this policy are referred to the appropriate disciplinary procedure based on the status of the employee in the position of greater power or authority over the other individual.

When allegations of sexual misconduct, relationship violence, or stalking arise in connection with an Intimate Relationship, the Studio will address such charges in accordance the above-described policy on Sexual Misconduct, Relationship Violence, and Stalking.

XII. PREVENTION AND AWARENESS PROGRAMS:

The Studio is committed to the prevention of Prohibited Conduct through education and awareness programs. Incoming first year students and new employees are offered primary prevention and awareness programming as part of their orientation and returning staff and students are offered ongoing training and related programs.

To comply with applicable law, the Studio also undertakes annual and interactive anti-sexual harassment training for all employees that, at minimum, includes (1) an explanation of sexual harassment; (2) examples of sexual harassment; (3) information concerning the federal and state laws concerning sexual harassment and remedies available to victims; and (4) information concerning employees' rights of redress and forums for complaints. To comply with new requirements under applicable law, a standard complaint form is forthcoming and will be made accessible to report violations of this policy.

XIII. ADDITIONAL POLICY DEFINITIONS:

"Complainant" means the Covered Person who presents as the victim of any Prohibited Conduct under the policy, regardless of whether that individual makes a report or seeks action under the policy.

"Employee" means anyone employed by the Stella Adler Studio of Acting, regardless of full-time, part-time, adjunct or freelance status.

"Preponderance of the Evidence" means that it is more likely than not that a policy violation occurred.

"Respondent" means the Covered Person(s) who has been accused of violating the policy.

"Responsible Employee" or "Responsible Officer" means those Employees in a leadership or supervisory position, or who have significant responsibility for the welfare of Students or Employees and who are designated above. "Responsible Employee" includes individuals or departments designated by the Studio to receive reports of Prohibited Conduct.

"The Studio" means the Stella Adler Studio of Acting in New York and any affiliated units, including the Art of Acting Studio.