

**STELLA ADLER STUDIO OF ACTING dba
ART OF ACTING STUDIO**

Title: Non-Discrimination and Anti-Harassment Policy and Complaint Procedures for Students

Effective Date: October 12, 2018

Responsible Officers: Johnny Yoder, School Director & Chief Operating Officer
Nike Doukas, Chief Academic Officer

I. PURPOSE OF THIS POLICY

The Stella Adler Studio of Acting (“the Studio” or “Stella Adler”), including the Art of Acting Studio, is committed to equal treatment and opportunity for its students, to maintaining an environment that is free of bias, prejudice, discrimination, and harassment, and to establishing complaint procedures for allegations involving students. Prohibited discrimination and prohibited harassment undermine the character and purpose of Stella Adler and may violate the law. They will not be tolerated.

Stella Adler prohibits conduct that constitutes or could lead or contribute to discrimination or harassment because of an individual’s race or color, religion or creed, alienage or citizenship status, sex (including pregnancy), national origin, age, sexual orientation, gender identity or expression, disability, marital status, familial status, domestic partnership status, genetic information or predisposing genetic characteristics, military status, domestic violence victim status, criminal history, or any other characteristic protected by law.

II. SCOPE OF THIS POLICY

This policy applies to all prohibited discrimination or prohibited harassment involving students of Stella Adler and all members of the Stella Adler Community in their interactions with Stella Adler students, with the exception of allegations of sexual harassment, sexual assault, or sexual misconduct by or against students, which are governed by the Stella Adler Sexual Misconduct, Relationship Violence, and Stalking Policy and Policy on Consensual Intimate Relationships.

New York University (“NYU”) students who participate in Stella Adler classes or programs are subject to the NYU Policy on Non-Discrimination and Anti-Harassment and all other applicable policies. NYU students who wish to make a complaint regarding discrimination or harassment should follow the procedures identified in the NYU Policies. Stella Adler is committed to cooperating fully with NYU in any investigation that is undertaken with respect to NYU students participating in its programs.

III. STATEMENT OF POLICY

Prohibited discrimination is adverse treatment of any student based on race or color, religion or creed, alienage or citizenship status, sex (including pregnancy), national origin, age, sexual orientation, gender identity or expression, disability, marital status, familial status, domestic partnership status, genetic information or predisposing genetic characteristics, military status, domestic violence victim status, criminal history, or any other characteristic protected by law. Prohibited discrimination also includes any conduct that constitutes illegal discrimination under the law of the jurisdiction in which the conduct occurs.

Prohibited harassment is unwelcome verbal or physical conduct based on race or color, religion or creed, alienage or citizenship status, sex (including pregnancy), national origin, age, sexual orientation, gender identity or expression, disability, marital status, familial status, domestic partnership status, genetic information or predisposing genetic characteristics, military status, domestic violence victim status, criminal history, or any other

characteristic protected by law. Prohibited harassment includes conduct that creates an intimidating, hostile, or offensive academic or residential environment or otherwise adversely affects academic opportunities or participation in a Stella Adler activity or benefit. Prohibited harassment also includes any conduct that constitutes illegal discrimination under the law of the jurisdiction in which the conduct occurs.

Examples of actions that constitute prohibited harassment may include, but are not limited to:

- Verbal abuse or hostile behavior, which could include insulting, teasing, mocking, degrading, or ridiculing another person or group;
- Ethnic slurs;
- Inappropriate physical contact, comments, questions, advances, jokes, epithets, or demands;
- Physical assault or stalking; or
- Displays or electronic transmission of derogatory, demeaning, or hostile materials.
- Use of Stella Adler computers (including via the Internet) or Stella Adler's e-mail system to view or distribute racially offensive communications; and/or
- Threatening, intimidating, or hostile acts directed at a particular sex or religious group or directed at an individual because of his or her sexual orientation, color or ethnicity.

Harassment does not require an intent to offend. Thus, inappropriate conduct or language meant as a joke, a prank, or even a compliment can lead or contribute to harassment.

IV. RESPONSIBILITIES TO REPORT

Stella Adler strongly encourages members of the Stella Adler Community who have been victims of prohibited discrimination or prohibited harassment to report the conduct. In the case of incidents of prohibited discrimination and prohibited harassment covered by this policy, reports may be made to the Responsible Officers. Allegations against any visitor, vendor, or third party of prohibited discrimination or prohibited harassment should be made to the Responsible Officers.

The written complaint should identify the parties involved; describe the alleged prohibited discrimination or prohibited harassment behavior; state when and where it occurred; and identify by name or description any witnesses. Complaints should be reported promptly so that an investigation can occur while recollections are freshest and evidence is retained, and so that remedial action can be taken in a timely manner where appropriate. In addition, any conduct that becomes known to Stella Adler that may be in violation of this policy will be investigated, regardless of whether a complaint is filed. Efforts will be made to complete the investigation of a complaint within thirty days of the report of the alleged prohibited discrimination or prohibited harassment. Extensions of this time period may be necessary or appropriate in some circumstances. The complainant and respondent will be notified of the extension.

If the Responsible Officers are implicated in the alleged discrimination or harassment, the report should be made to the Artistic Director. If the Artistic Director is implicated in the alleged discrimination or harassment, the report should be made to the Chair of the Board of Directors.

V. CONFIDENTIALITY

Stella Adler will maintain the confidentiality of the complaint to the greatest extent consistent with the goal of conducting a thorough and complete investigation and effecting any appropriate remedial action.

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 Stella Adler is obligated to report all complaints to NYU.

VI. INVESTIGATION AND DISPOSITION OF THE COMPLAINT

Upon receiving a complaint of prohibited discrimination or prohibited harassment against any student, one or both of the Responsible Officers will review the complaint to determine whether an investigation is warranted. If warranted, the Responsible Officers will conduct a prompt, thorough, and impartial review of the complaint in the manner the Officer deems appropriate. The parties to the complaint each will have an opportunity to be heard during the investigation. The investigation also may include interviews with any other person who may have information bearing on the allegations of prohibited conduct, each of whom is encouraged to cooperate with any investigation. The Responsible Officer also may review relevant documents. The parties will be informed of the status of the investigation as deemed appropriate by the Responsible Officers.

At the conclusion of the investigation, the Responsible Officer will prepare a written report. The report will describe the scope of the investigation and whether any of the allegations in the complaint were substantiated. If the Responsible Officer determines that a violation of this policy has occurred and remedial action is warranted, the Responsible Officer will recommend a remedial action and the process for its implementation. Depending upon the particular facts and circumstances, the Responsible Officer may recommend administrative and/or educational interventions to be implemented. The Responsible Officer, after consulting with such other individuals deemed appropriate under the circumstances, will render the final determination regarding any remedial or disciplinary action to be taken and will communicate the determination in writing to the complainant and the respondent.

If it is determined that no violation has occurred or that there is insufficient evidence upon which to make a finding whether a violation occurred, such findings will be communicated in writing to the complainant and the respondent. If the results of an investigation show that the complainant knowingly filed false accusations of harassment, or that a witness gave false statements, such individuals will be subject to the appropriate disciplinary action.

Allegations against any visitor, vendor, or third party of prohibited discrimination or prohibited harassment will be investigated by the Responsible Officer. A final determination regarding any remedial action will be made by an appropriate Stella Adler representative.

For Third Party Complainants, including any visitor, vendor, or third party, Stella Adler 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 Stella Adler.

VII. RETALIATION

Stella Adler will take all reasonable steps to protect the complainant and any witnesses from retaliation for reporting discrimination or harassment or for participating in the investigation of a complaint. Any member of the Stella Adler Community who retaliates against an individual who complains of discrimination or harassment or witnesses discrimination or harassment, or participates in the investigation of a discrimination or harassment complaint violates this policy and may be subject to sanctions. Complaints of retaliation should be reported as violations of this policy.

VIII. DEFINITIONS

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

“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 Stella Adler to receive reports of Prohibited Conduct.

“Stella Adler” means the Stella Adler Studio of Acting in New York and any affiliated units, including the Art of Acting Studio in Los Angeles.

Stella Adler Community means Stella Adler faculty, including visiting faculty and adjuncts; professional staff; students; and consultants, vendors and contractors.