



## **InnoVision Talent Agency Discrimination, Harassment, and Retaliation Prevention Policy**

### **Policy**

InnoVision Talent Agency is committed to providing a professional work environment free from discrimination and harassment, including discrimination and harassment based on a protected category, and an environment free from retaliation for participating in any protected activity covered by this policy. InnoVision Talent Agency is committed to providing equal employment opportunities to all employees and applicants for employment. Accordingly, we have adopted and maintain this anti-discrimination policy designed to encourage professional and respectful behavior and prevent discriminatory and harassing conduct in our workplace.

The California Fair Employment & Housing Act (FEHA) provides protection from discrimination and harassment in employment based on protected categories, including race (including traits historically associated with race, including but not limited to, hair texture and protective hairstyles), color, religious creed (includes religious dress and grooming practices), sex/gender (includes pregnancy, childbirth, breastfeeding and/or related medical conditions), gender identity, gender expression, sexual orientation, marital status, medical condition (genetic characteristics, cancer or a record of history of cancer), military or veteran status, citizenship status, national origin (includes language use and possession of a driver's license issued to persons unable to prove their presence in the United States is authorized under federal law), ancestry, disability (mental and physical, including HIV/AIDS, cancer, and genetic characteristics), genetic information, protected medical leaves (requesting or approved for leave under the Family and Medical Leave Act or the California Family Rights Act), request for Pregnancy Disability Leave, and age (40 years old or over). The FEHA prohibits co-workers, supervisors, managers, and third parties with whom the employee comes into contact from engaging in conduct prohibited by the FEHA.

This policy prohibits all InnoVision Talent Agency employees and contractors from harassing or discriminating against applicants, employees, and contractors because (i) of an individual's protected classification, (ii) of the perception of an individual's protected classification, or (iii) the individual associates with a person who has or is perceived to have a protected classification. In addition to the protections under FEHA, InnoVision Talent Agency prohibits discrimination or harassment based on any other status protected by California or federal law.

InnoVision Talent Agency also prohibits retaliation against a person who engages in activities protected under this policy. Reporting, or assisting in reporting, suspected violations of this policy and cooperating in investigations or proceedings arising out of a violation of this policy are protected activities under this policy.

All employees and contractors are expected to assume responsibility for maintaining a work environment that is free from discrimination, harassment and retaliation.

Employees and contractors are encouraged to promptly report conduct that they believe violates this policy so that we have an opportunity to address and resolve any concerns. InnoVision Talent Agency staff are required to promptly report conduct that they believe violates this policy. We are committed to responding to alleged violations of this policy in a timely and fair manner and to taking appropriate action aimed at ending the prohibited conduct.

Contact information for InnoVision Talent Agency's Talent Relations Department  
is: [HR@InnoVisionTalentAgency.com](mailto:HR@InnoVisionTalentAgency.com) or 619-963-2820

## **Scope of Protection:**

This policy applies to InnoVision Talent Agency's applicants, contractors and employees (co-workers, supervisors and managers) in California. As used in this policy, the term "employee" or "employees" includes talent who are registered with InnoVision Talent Agency to work as a background actor, stand-in, or photo double in motion pictures, shows, commercials, music videos, or other similar projects of InnoVision Talent Agency's clients in California. (In addition to this InnoVision Talent Agency policy, InnoVision Talent Agency's clients often also have their own workplace policy on discrimination, harassment and retaliation that apply to you when you work on the client's projects. In the event that a client does not have its own policy, employees should still refer to this InnoVision Talent Agency policy.) In addition, InnoVision Talent Agency's policy extends to conduct with a connection to an employee's work, even when the conduct takes place away from InnoVision Talent Agency's premises or a client's set, such as lodging at an overnight location for a client's project.

## **Applicant/Employee Rights:**

- The right to a discrimination, harassment, and retaliation-free work environment.
- The right to file a complaint of discrimination, harassment, or retaliation. Employees and contractors are encouraged to report inappropriate conduct immediately and, whenever possible, to put the complaint or concern in writing to InnoVision Talent Agency's Talent Relations Department.
- The right to a full, impartial and timely investigation by an InnoVision Talent Agency representative or designee into allegations of conduct that would violate this policy.
- The right to be free from retaliation or reprisal after filing a complaint or participating in the complaint process.
- The right to file a complaint directly with the California Department of Fair Employment and Housing, the federal Equal Employment Opportunity Commission or other appropriate state or federal agencies, or to file a civil action in the appropriate court.

## **Conduct Prohibited By This Policy/Definitions**

### **Discrimination:**

InnoVision Talent Agency strongly disapproves of discriminatory conduct in any form. InnoVision Talent Agency has zero tolerance for any conduct that violates this policy. Conduct need not rise to the level of a violation of law to violate this policy. Instead, a single act can violate this policy and provide grounds for discipline or other appropriate sanctions. If you are in doubt as to whether any particular conduct may violate this policy, do not engage in the conduct and seek guidance from InnoVision Talent Agency's Talent Relations Department.

As used in this policy, discrimination is defined as treating individuals differently because of the individual's protected classification as defined in this policy. Protected categories include those described above in the FEHA protections and any other status protected by California or federal law.

Depending on the circumstances, discrimination may include, but is not limited to: hostile or demeaning behavior towards applicants or employees because of their protected category; allowing the applicant's or employee's protected category to be a factor in hiring, promotion, compensation or other employment related decisions unless otherwise permitted by applicable law; and providing unwarranted assistance or withholding work-related assistance, cooperation, and/or information to applicants or employees because of their protected category.

### **Harassment:**

InnoVision Talent Agency strongly disapproves of harassment in any form. Sexual harassment is considered to be sex discrimination in violation of applicable state and federal laws, subjecting the harassing employee to legal liability. InnoVision Talent Agency has zero tolerance for any conduct that violates this policy. Conduct need not rise to the level of a violation of law to violate this policy. Instead, a single act can violate this policy and provide grounds for discipline or other appropriate sanctions. If you are in doubt as to whether any particular conduct may violate this policy, do not engage in the conduct and seek guidance from InnoVision Talent Agency's Talent Relations Department.

As used in this policy, harassment is defined as unsolicited words or conduct that subjectively and objectively offends another person, including disrespectful or unprofessional conduct based on any of the protected categories listed above. Harassment (including sexual harassment) can be verbal (such as slurs, jokes, insults, epithets, gestures, or teasing), visual (such as the posting or distribution of offensive posters, symbols, cartoons, drawings, computer displays, or emails), or physical (such as physically threatening another person, blocking someone's way, making physical contact in an unwelcome manner, etc.).

#### **Sexual Harassment:**

As used in this policy, sexual harassment is defined as harassment based on sex or conduct of a sexual nature, and includes harassment based on sex (including pregnancy, childbirth, breastfeeding, or related medical conditions), gender, gender identity or gender expression. It may include all of the actions described above as harassment, as well as other unwelcome sex-based conduct, such as unwelcome or unsolicited sexual advances, requests for sexual favors, conversations regarding sexual activities, or other verbal or physical conduct of a sexual nature. Sexually harassing conduct need not be motivated by sexual desire and may include situations that began as reciprocal relationships, but that later cease to be reciprocal.

Sexual harassment is generally categorized into two types:

1. Quid Pro Quo Sexual Harassment (also known as "this for that"):

- Submission to sexual conduct is made explicitly or implicitly a term or condition of an individual's employment.
- Submission to or rejection of the conduct by an employee is used as the basis for employment decisions affecting the employee.

2. Hostile Work Environment Sexual Harassment:

- Conduct of a sexual nature or on the basis of sex by any person in the workplace that unreasonably interferes with an employee's work performance and/or creates an objectively intimidating, hostile or otherwise offensive working environment. Examples include:
  - Unwelcome sexual advances, flirtation, teasing, sexually suggestive or obscene letters, invitations, notes, emails, voicemails or gifts.
  - Sex, gender or sexual orientation-related comments, slurs, jokes, remarks or epithets.
  - Leering, obscene or vulgar gestures or making sexual gestures.
  - Displaying or distributing sexually suggestive or derogatory objects, pictures, cartoons, or posters or any such items.
  - Impeding or blocking movement, unwelcome touching or assaulting others.
  - Any sexual advances that are unwelcome as well as retaliation or threats after a negative response to sexual advances.
  - Conduct or comments consistently targeted at one gender, even if the content is not sexual.

#### **Retaliation:**

InnoVision Talent Agency strongly disapproves of retaliation in any form. InnoVision Talent Agency has zero tolerance for any conduct that violates this policy. Conduct need not rise to the level of a violation of law to violate this policy. Instead, a single act can violate this policy and provide grounds for discipline or other appropriate sanctions. If you are in doubt as to whether any particular conduct may violate this policy, do not engage in the conduct and seek guidance from InnoVision Talent Agency's Talent Relations Department.

As used in this policy, retaliation is defined as an adverse employment action taken against an employee because the employee engaged in protected activity and not for a legitimate business reason. Protected activities may include, but are not limited to, reporting or assisting in reporting, in good faith, suspected violations of this policy and/or cooperating in investigations or proceedings arising out of a violation of this policy.

An adverse employment action is an action that materially and adversely affects the terms or conditions of the employee's employment or contractors' Talent Agency Relationship. However, even actions that do not result in a direct loss of compensation may be regarded as an adverse employment action when considered in the totality of the circumstances and may violate this policy.

Examples of retaliation under this policy may include, but are not limited to, the following actions taken because the employee or contractor engaged in protected activity and not for a legitimate business reason: demotion; suspension; reduction in pay; denial of a merit salary increase; failure to hire or consider for hire; refusing to promote or consider for promotion because of reporting a violation of this policy; harassing another employee for filing a complaint; denying employment opportunities because of making a complaint or for cooperating in an investigation; changing someone's work assignments for identifying harassment or other forms of discrimination in the workplace; treating people differently such as denying a reasonable accommodation; or not talking to an employee when otherwise required by job duties, or otherwise excluding the employee from job-related activities because of engagement in activities protected under this policy.

## **Training Requirements**

Every two years, all California employees and contractors must attend Sexual Harassment Prevention and Workplace Civility training aimed at increasing their understanding of and preventing workplace sexual harassment (including harassment on the basis of sexual orientation, gender identity, and gender expression) and their role in creating an underlying culture of mutual respect in our workplace. Specific components of the training will include how to promptly and effectively respond to sexual harassment when it occurs, the effects of abusive conduct in the workplace, and ways to appropriately intervene if one witnesses behavior that violates this policy. InnoVision Talent Agency will provide the above-mentioned training.<sup>1</sup>

## **Addressing and Reporting Violations of This Policy**

If you experience or witness behavior that you believe violates this policy, you are encouraged to immediately tell the offending individual that the behavior is inappropriate and, if you feel comfortable doing so, tell the offending individual to stop the behavior. The offending individual can be a co-worker, supervisor, manager or a third party.

You should also immediately report the alleged violation to InnoVision Talent Agency's Talent Relations Department. If the conduct is occurring on the set of a production, then you should immediately report the conduct to an Assistant Director on that set.

On the production set, your supervisors or managers are the individuals directing and controlling your work activities; often, this is the Assistant Director but can include other individuals such as a Producer, Production Supervisor, or the Director. If the alleged offender is your supervisor or manager, then you should report the conduct to any other supervisor or manager. For example, if the alleged offender is an Assistant Director on a production on which you are working, you should report the conduct to another Assistant Director, a Producer, a Production Supervisor, or the UPM on that same production, and also report it to InnoVision Talent Agency's Talent Relations Department.

InnoVision Talent Agency's staff do not supervise your work and are not your supervisors; thus, when reporting any conduct to InnoVision Talent Agency that you believe violates this policy, please contact InnoVision Talent Agency's Talent Relations Department.

A complaint may be brought forward verbally or in writing. Written complaints can be made using the complaint form that is attached to this policy or by using any other written method.

InnoVision Talent Agency staff who learn of any potential violation of this policy are required to immediately report the matter to InnoVision Talent Agency's Talent Relations Department and must follow that Department's instructions as to how best to proceed.

---

<sup>1</sup> The California Department of Fair Employment and Housing (DFEH) also has available an online training on its website, available at [www.dfeh.ca.gov/shtp/](http://www.dfeh.ca.gov/shtp/). InnoVision Talent Agency does not require employees to take the DFEH version.

InnoVision Talent Agency will promptly look into the facts and circumstances of any alleged violation, as appropriate. Even in the absence of a formal complaint, InnoVision Talent Agency may initiate an investigation when it has reason to believe that conduct that violates this policy has occurred. Moreover, even where a complainant requests to withdraw their initial formal complaint, InnoVision Talent Agency may continue the investigation to ensure that the workplace is free from discrimination, harassment and retaliation. Anonymous complaints will also be investigated to the extent possible given the amount of details provided in the anonymous complaint. All investigations will be fair, impartial, timely, and completed by qualified personnel.

To the extent possible, InnoVision Talent Agency will endeavor to keep the reporting of the applicant or employee's concerns confidential; however, complete confidentiality cannot be guaranteed when it interferes with InnoVision Talent Agency's ability to fulfill its obligations under this policy.

All employees are required to cooperate fully with any investigation. This includes, but is not limited to, a requirement on employees to maintain an appropriate level of discretion and confidentiality regarding the investigation and to disclose to InnoVision Talent Agency's investigator any and all information that may be pertinent to the investigation.

Upon completion of the investigation, if misconduct is substantiated, InnoVision Talent Agency will take appropriate corrective and preventive action calculated to end the conduct up to and including formal discipline against any employee(s). Such corrective action(s) may include, but is not limited to, letters of reprimand, suspension, or termination.



## **InnoVision Talent Agency Discrimination, Harassment, and Retaliation Prevention Policy Complaint Form**

If you believe that you have been subjected to discrimination, harassment and/or retaliation in violation of InnoVision Talent Agency's policy, you are encouraged to complete the form below and submit it via email to InnoVision Talent Agency Talent Relations at: [HR@InnoVisionTalentAgency.com](mailto:HR@InnoVisionTalentAgency.com). If you are more comfortable reporting verbally, you can submit a complaint by phone at 619-963-2820. You will not be retaliated against for filing a complaint.

You may request a printed version of this document at any time by emailing [HR@InnoVisionTalentAgency.com](mailto:HR@InnoVisionTalentAgency.com) located at 5961 Kearny Villa Road, San Diego, CA 92123.

### **Complainant information**

Full Legal Name:

Address:

Phone:

Email:

### **Complaint information**

1. Your complaint is made about:

Name:

Title:

Work Address:

Work Phone:

Relationship to you:  Supervisor  Co-Worker  Other: \_\_\_\_\_

2. If the events occurred on a production on which you worked, what is the name of the production?

3. Please describe what happened and how it is affecting you and your work. Please use additional sheets of paper if necessary and attach any relevant documents or evidence.

4. Date(s) incident occurred:

Is the conduct you are complaining about still continuing?  Yes  No

5. Please list the name and contact information of any witnesses or individuals who may have information related to your complaint:

*The last question is optional, but may help the investigation.*

6. Have you previously complained or provided information (verbal or written) about related incidents? If yes, when and to whom did you complain or provide information?

---

Signature

---

Date