



NO HARASSMENT POLICY

POLICY – NTS strictly prohibits harassment and also potentially harassing conduct, of a sexual nature or because of a person’s sex, race, color, national origin, religion, age or disability (“protected status”). Prohibited conduct includes both verbal and physical conduct by any person, including employees, supervisors, managers and others having business with NTS, which potentially harasses, disrupts or interferes with an employee’s work performance or which potentially creates an intimidating, offensive or hostile working environment. Conduct in violation of this policy may occur between people of the same, or of different, sex or protected status. Conduct in violation of this policy will result in disciplinary action up to and including immediate discharge.

PROHIBITED CONDUCT – Examples of conduct prohibited by this policy include: (1) offering or granting employment benefits or preferential treatment to an employee in exchange for sexual favors, (2) taking or threatening adverse employment action against an employee for refusing a request for sexual favors or for reporting violations of this policy, (3) engaging in unwelcome physical touching of another person including fondling, inappropriate brushing and blocking of another’s movement around the workplace, (4) displaying materials, including objects, pictures, calendars, magazines, catalogues, posters and computer images, that are sexually suggestive or that are demeaning or threatening on the basis of a protected status, (5) transmitting communications, by phone, computer, voice mail, letter, note or otherwise, that are sexually suggestive or that are demeaning or threatening on the basis of a protected status, (6) making comments, including jokes, innuendo, and references to a person’s appearance, anatomy or clothing, that are sexually suggestive or that are demeaning or threatening on the basis of a protected status, (7) making repeated, unwanted requests for a date, and (8) making sexually suggestive or inappropriate physical gestures including oral or manual gestures, leering and ogling. These examples are not intended as a complete list of physical or verbal conduct that may violate this policy.

REPORTING OF VIOLATIONS – NTS’ policy is to stop potentially harassing conduct before it affects the working environment of any employee. Employees are encouraged to report, and are expected to report, any conduct which violates the spirit and intent of this policy whether the conduct is directed at them or at others. Reports of harassing or potentially harassing conduct may, at the employee’s discretion, be reported in the first instance to his/her immediate supervisor, to the Human Resources Director, or to the President of NTS.

SUPERVISOR REPORTING OF VIOLATIONS – Supervisors are required to report violations of this policy to the Human Resources Director or to the President of NTS. Failure of a supervisor to report such violations will result in disciplinary action up to and including immediate discharge.

PROHIBITION OF RETALIATION – NTS strictly prohibits any employee, supervisor or manager from taking adverse action against any employee who truthfully reports a violation of this policy.

INVESTIGATION AND REMEDY – It is NTS’ policy to immediately investigate and, where appropriate, to take immediate remedial action with respect to all complaints under this policy. Any employee, who violates this policy, whether or not such conduct constitutes harassment for legal purposes, will be subject to disciplinary action up to and including immediate discharge. In the event there is insufficient evidence that a violation of this policy has occurred, NTS will, if appropriate, take action to protect employees from recurrence of the reported conduct and from retaliation for reporting the conduct.