1. **Purpose**

MTS is committed to promptly investigating all possible violations of its Harassment-free Workplace Policy and swiftly implementing appropriate corrective action. This Procedure sets out the steps to follow when MTS receives a report of conduct that potentially violates its Harassment-free Workplace Policy.

1. **Scope**

This Procedure applies to all individuals covered by MTS’ Harassment-free Workplace Policy.

1. **Definitions**

See HR-013 Harassment-free Workplace Policy

1. **Policy**

MTS strictly prohibits and does not tolerate harassment on the basis of membership in a Protected Class. Engaging in harassment is considered a form of employee misconduct that could result in discipline up to and including termination.

MTS prohibits retaliation against anyone who reports a possible violation of this policy or assists with a related investigation. Retaliating against individuals who report sexual harassment or who testify or assist in any proceeding related to sexual harassment is unlawful.

1. **Process**

5.1 Any employee who believes s/he has experienced or witnessed conduct that potentially violates MTS’ Harassment-free Workplace policy must promptly report the conduct to one of the following resources:

* His/her supervisor;
* Any other MTS supervisor or manager;
* Human Resources Business Partner;
* His/her local MTS Ethics Committee;
* The MTS Business Ethics and Compliance Office: 952-937-4209;
* The MTS AlertLine for North America: 888-321-5562 or <https://mts.alertline.com>; or
* The MTS Office of General Counsel: 952-937-4286

5.2 Any manager who receives a complaint or is otherwise made aware of a potential violation of MTS’ Harassment-free Workplace Policy must immediately notify Human Resources or the Office of General Counsel (“OGC”). Failure of a manager to notify Human Resources or the OGC and knowingly allow a potential violation of MTS’ Harassment-free Workplace Policy to continue without investigation may result in that individual being subject to discipline, up to and including termination.

5.3 Human Resources or the OGC will immediately initiate a confidential investigation in a fair, timely, and thorough manner that provides all parties appropriate due process and reaches reasonable conclusions based on the evidence collected. Confidentiality of the investigation will be kept by MTS to the greatest extent possible, however, the investigation will not be kept completely confidential. The investigation will Human Resources, the OGC or a third-party professional investigator will conduct interviews with the parties named in the complaint and witnesses identified in the course of the investigation. The investigator will collect copies of any documentation relevant to the investigation, such as diaries, e-mails, text messages or letters.

5.4 Human Resources or the OGC will only share information regarding the investigation with individuals who have a need to know about it, such as managers directly involved with the employees named in the complaint. Any individuals interviewed as part of the investigation will be instructed not to discuss the interview with anyone other than Human Resources, the OGC or the appropriate managers. A violation with regard to discussing the matter with others may result in disciplinary action up to and including termination.

5.5 If an employee has come forward with a complaint, Human Resources and the appropriate manager will make arrangements for the employee not to work in close proximity with the alleged harasser(s) until the investigation is completed.

5.6 Human Resources and the OGC will analyze the evidence collected during the course of the investigation and determine the appropriate course of action.

5.7 Human Resources will follow up with the employees named in the complaint to inform them the investigation has been completed and appropriate action has been taken. Information regarding disciplinary action taken as a result of the investigation is confidential and will not be disclosed.

5.8 Any employee who feels s/he is subject to retaliation as a result of participating in the investigation should immediately contact Human Resources or the OGC.

1. **Policy Owner**

Human Resources and the OGC.

1. **References**

HR-013 Harassment-free Workplace Policy

HR-013.02 Acknowledgment of Receipt of Harassment-free Workplace Policy

HR-001 Equal Employment Opportunity

OGC-004.01 Investigation of Ethics, Integrity and Compliance Concerns

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| **REVISION HISTORY** |
| **Rev** | **Description of Change** | **Effective Date** |
| 2 | Update reporting mechanisms | 8/1/2013 |
| 3 | Changed procedure title. Rewrote procedure. | 6/1/2015 |
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