



PAY TRANSPARENCY POLICY

Organizational Functional Area:	Human Resources
Policy Name:	Pay Transparency Policy
Last Revision Date:	December 2024
Department or Individual Responsible for Maintaining and Updating Policy or Program:	Human Resources

The Bank will not discharge or in any other manner discriminate against associates or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, associates who have access to the compensation information of other associates or applicants as a part of their essential job functions cannot disclose the pay of other associates or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information.