

PAY TRANSPARANCY POLICY STATEMENT



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| Organizational Functional Area: | Human Resources |
| Policy Name: | Pay Transparency Policy |
| Last Revision Date: | December 2015 |
| Department or Individual Responsible For Maintaining and Updating: | 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.