



<b>Title:</b> <b>WAGE DISCLOSURE PROTECTION AND PAY TRANSPARENCY POLICY</b>	<b>Policy Number:</b> <b>GHI-HR-HR-C217</b>
--	--

**I. PURPOSE**

The purpose of this Policy is to inform all employees and/or applicants of their rights and remedies regarding wage disclosure under Minnesota and federal law. This Policy is not intended to diminish any existing rights employees may have under federal labor law.

**II. POLICY**

As a federal contractor, the Employer complies with 41 CFR Section 60-1.4(a)(3) and will not discharge or otherwise discriminate against employees or applicants because they have asked about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their job cannot disclose the pay of other employees 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 Employer's legal duty to furnish information.

Employees may have additional rights and remedies pursuant to Minn. Stat. Section 181.172. In particular, employees may voluntarily disclose their wages without being retaliated against, subject to the restrictions described below. The Employer shall not require nondisclosure by an employee of their wages as a condition of employment; shall not require an employee to sign a waiver or other document which purports to deny an employee the right to disclose the employee's wages; and shall not take any adverse action against an employee for disclosing the employee's own wages or discussing another employee's wages which have been disclosed voluntarily.

This Policy does not obligate any employee to disclose their wages to any other employee. This Policy does not permit an employee to disclose (without the written consent of the Employer's Chief Executive Officer) proprietary information, trade secret information, or information that is otherwise subject to a legal privilege or protected by law; or permit the employee to disclose wage information of other employees to a competitor.

The Employer will not take adverse action or retaliate against an employee for asserting their rights or remedies under this Policy. An employee may bring a civil action for a violation of Minn. Stat. Section 181.172. If a court finds that the Company has violated Minn. Stat. Section 181.172, the court may order reinstatement, back pay, restoration of lost service credit, if appropriate, and the expungement of any related adverse records of an employee who was the subject of the violation.

**III. APPROVALS**

Human Resources Leadership Team