

PAY TRANSPARENCY POLICY STATEMENT

Duff & Phelps will not discharge or in any other manner discriminate against employees or applicants because they have inquired 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 essential job functions 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 contractor's legal duty to furnish information. 41 CFR 60-1.35(c)

Employees who have access to confidential proprietary business information and employee compensation of other employees or applicants as a part of the essential job duties or who are not authorized to access this information are prohibited from disclosing such information including compensation to individuals who did not otherwise have access to it will be disciplined up to and including discharge.