

Pay Transparency Non-Discrimination

Office Depot 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 associate or applicant. However, associates who have access to compensation information of other associates or applicants as 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 Company, or (c) consistent with the Company's legal duty to furnish information. 41 CFR 60-1.35(c).