

*Effective: January 2016*

**POLICIES, CULTURE, AND OPERATIONS**  
**Section 3.10.1: Gender Pay-Scale Equity**

Bruner/Cott & Associates, Inc.  
130 Prospect Street  
Cambridge, Massachusetts 02139  
tel: 617 492 8400 | fax: 617 876 4002

**Bruner/Cott**

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BCA is dedicated to upholding gender pay scale equity. The firm maintains a fair and equitable pay scale and does not discriminate based on gender or gender identity. All employees performing the same or similar work or work of equal value will be compensated on the same pay scale, which is based on individual merit, qualifications, levels of experience, and competence.

BCA conducts regular internal reviews of the pay scale of all employees to ensure there is no gender-based bias.