

Paychex Code of Vendor Conduct

This Paychex Code of Vendor Conduct (“Code”) sets forth Paychex’ expectations for environmental, ethics, human rights, anti-corruption, and diversity and inclusion policies and practices for Paychex vendors. The Code is guided by the Universal Declaration of Human Rights and the International Labour Organization’s Fundamental Conventions. Paychex expects its vendors to conduct their operations in accordance with all applicable professional standards, legal requirements, the Paychex Code of Business Ethics and Conduct, and this Code.

Applicable terms in a vendor’s contract with Paychex supersede any conflicting provisions of this Code.

Respect the Environment

Paychex seeks to engage vendors who are environmentally conscious and who strive to reduce the environmental impact of their products or services. Vendors should comply with all applicable environmental laws. Vendors should document and post safety practices to reduce the risk of injury, death or damage to property and the environment; take proactive measures to mitigate any environmental impacts of their operations; promote environmental responsibility; conduct supply chain audits for environmental management; and encourage the development of sustainable and environmentally friendly technologies.

Ethical Business Practices

Paychex believes that appropriate anti-corruption, labor and human rights practices are in the best interests of our clients, shareholders, employees, partners and communities. In respect of human rights, we expect our vendors to comply with Paychex’ human rights and occupational health and safety policies; all applicable employment laws, including laws related to wages and hours and collective bargaining; ensure against the use of child or forced labor; promote freedom of association; and maintain policies and protections against workplace discrimination, violence, abuse and harassment.

To support anti-corruption regulations and ethics, vendors should not directly or indirectly provide or give money, gifts of more than nominal value, or other compensation benefiting Paychex or Paychex personnel in efforts to influence business decisions. Vendors should not make payments or donations to political campaigns on behalf of Paychex or to gain favor or to influence Paychex business decisions, to benefit Paychex, or to increase the likelihood of working with Paychex.

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(continued)

Value Inclusion and Diversity

Paychex believes that a well-rounded combination of people and ideas fosters creativity and makes Paychex a stronger company. Paychex is committed to fostering an inclusive environment where we acknowledge, respect and employ all dimensions of diversity

Vendors are expected to value and incorporate diversity and inclusion policies and practices in operations and their supply chain.

Supply Chain Audits

Where applicable, Paychex may request vendors to provide mutually agreeable information regarding supply chain audits related to product safety.