

Paychex Third Party Code of Conduct

This Paychex Third Party Code of Conduct (“Code”) sets forth Paychex’ expectations for environmental, ethics, anti-corruption, human rights, diversity and inclusion, workplace safety and health, financial integrity, trade controls and non-retaliation policies and practices for Third Parties conducting business with Paychex. “Third Party” means any party with whom Paychex has some form of business relationship, excluding clients. Third Parties include, but are not limited to joint venture partners, consortium partners, contractors, consultants, suppliers, vendors, service providers, agents, intermediaries, distributors, or resellers. The Code is guided by the Universal Declaration of Human Rights and the International Labour Organization’s Fundamental Conventions. Paychex expects its Third Parties 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 Third Party’s contract with Paychex supersede any conflicting provisions of this Code.

Respect the Environment

Paychex seeks to engage Third Parties who are environmentally conscious and who strive to reduce the environmental impact of their products or services. Paychex Third Parties should comply with all applicable environmental laws; 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

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communities. In respect of human rights, we expect our Third Parties 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, Paychex Third Parties 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. Paychex Third Parties 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.

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. Paychex Third Parties 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 Third Parties to provide mutually agreeable information regarding supply chain audits related to product safety.

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Workplace Safety and Health

Paychex emphasizes workplace safety and health, and expects its Third Parties to incorporate health and safety management practices into all aspects of their business. Third Parties are expected to fully comply with all applicable safety and health laws, including in the areas of occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food, and housing. Third Parties should minimize employee and visitor exposure to potential safety hazards by appropriately identifying, assessing and minimizing risk.

Financial Integrity

All Third Party business dealings, structure, financial situation, and performance should be transparently performed and accurately reflected in their business books and records in accordance with applicable laws and regulations, as well as prevailing industry business practices. Paychex expects its Third Parties to have zero tolerance policies regarding corruption, misrepresentation, extortion, embezzlement, kickbacks, bribery and any other type of corrupt actions to obtain or retain business or to obtain an unfair or improper advantage.

Conflict Minerals

All Third Parties are expected to ensure that products and goods supplied to Paychex do not contain metals or materials that are derived from minerals originating from conflict regions (“Conflict Minerals”). Conflict Minerals are minerals and their derivatives that directly or indirectly finance or benefit armed groups.

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Trade Controls

International trade control (“ITC”) laws and regulations and country-specific trade sanctions, affect international transactions involving goods, services, technology and financial transactions. All Third Parties are expected to operate in full compliance with all applicable ITC laws and regulations.

Non-retaliation

Paychex is committed to providing a working environment that promotes ongoing and open communication in relation to ethics, compliance or other related matters and encourages reporting of violations or potential violations of any Paychex policy, professional standards, any applicable law or regulation, without fear of retaliation. Personnel of Third Parties shall not be subjected to harassment, intimidation, threats, coercion, discrimination, or any form of reprisal, because they have reported, in good faith, an ethics, compliance or related concerns; or assisted or participated in an ethics, compliance or related investigation or proceeding.

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