

# Paychex Human Rights Policy

## Purpose

In support of our vision, we align with the UN Guiding Principles on Business and Human Rights, UN Global Compact, UN Declaration of Human Rights, OECD Guidelines for Multinational Enterprises, and the International Labour Organization, and are committed to respecting human rights in our own operations and throughout our organization, regardless of geographic location. We believe the protection of human rights is fundamental to conducting great business, and believe we have both the ability and responsibility to drive positive change through our culture, business practices, and partnerships.

## Human Rights Guiding Principles

Paychex adheres to the following principles:

- **Minimum Age for Employment:** we prohibit the employment of anyone under the legal working age as defined by local law and/or the principles of this Policy, whichever is higher. We do not tolerate the use of child labor.
- We support our employees' rights under labor and employee laws and regulations.
- **Forced Labor:** we do not tolerate the use of forced or involuntary prison labor.
- **Abuse and Harassment:** we prohibit the use of corporal punishment or other forms of physical or sexual harassment or abuse.
- **Discrimination:** we prohibit discrimination on the basis of membership in legally protected groups including age, race, disability (physical and mental), ethnicity, family or marital status, gender expression, language, nationality, political affiliation, religion, sexual orientation, socio-economic status, veteran status, and any other unique individual difference.
- **Freedom of Association:** we recognize, ensure compliance with local law, and respect the rights to freedom of association.
- **Freedom of Expression:** we support the right to freedom of expression. This right shall include freedom to hold opinions and to receive and impart information and ideas without interference by public authority.
- **Work Hours, Work Week, and Payment of Wages:** we provide fair and equitable wages and other employment conditions in accordance with applicable laws and/or the principles of this Policy. We recognize that our employees have a life outside of Paychex, which is why we're committed to providing a flexible responsive workplace that enables all employees to balance work and their family/personal responsibilities. We work to ensure full compliance with applicable wage, work hours, overtime, and benefits laws.
- **Health and Safety:** we require working conditions in compliance with all applicable laws regarding worker health and safety.
- **Bribery:** we prohibit improper payments in the conduct of our business and expect full compliance with the U.S. Foreign Corrupt Practice Act and all other applicable anti-corruption laws.
- **Recruitment of Workers:** we require labor recruitment and employment procedures to be carried out in a legal, ethical manner.
- **Water and Sanitation:** we aim to understand and, where relevant, address water access risk, respecting everyone's right to safe, accessible, and affordable water.

## Scope

We seek to respect human rights across our operations, which is represented by our stakeholders, including but not limited to employees, suppliers, contractors, and rights holders such as the following: women, children, indigenous populations, minorities, and people with disabilities.

## Administrative and Governance

This Policy and all statements herein – including any recommended changes or updates – are (or, as applicable, must be) approved by relevant members of the Paychex Executive team who oversee implementation of this Policy.

A Steering Committee – including the Vice President, Chief Legal & Ethics Officer, and Secretary – monitors compliance with this Policy and developments within the industry. They are also responsible for inspecting the overall governance of this Policy.

## Due Diligence

We believe a critical aspect of a resilient, effective human rights approach begins with ensuring communications and training. Our Annual “Right Way” training is designed to increase awareness about the guidelines that protect us as employees and as an organization. At Paychex, the demonstration of accountability, integrity, and respect in the workplace is the right way, the best way, the only way we want to operate.

We are committed to addressing any adverse human rights impacts which we have caused or to which we have contributed, and expect our suppliers, business partners, and other relevant stakeholders to do the same. In addition, with respect to human rights, we expect our Third Parties to comply with Paychex’ Human Rights and Occupational Health and Safety Policies.

## Grievance Mechanisms

We provide several ways for employees, suppliers, business partners, communities, and other stakeholders to raise concerns or complaints. This includes the reporting of potential misconduct to managers, Human Resources, the Legal Department and the Ethics & Compliance team, and our confidential Ethics & Compliance Hotline. The Hotline is open to all and is available 24 hours a day.

## Review Schedule

**Revised:** November 2022

**Next Review Date:** November 2023