

Anti-Bribery and Anti-Corruption Policy

Introduction

PURPOSE

TriNet is committed to building a strong culture of integrity and accountability and wants colleagues to act with a shared sense of values so that the company can succeed the **right** way. As part of this commitment, TriNet does not participate in or endorse any corrupt practices, including offering, soliciting, promising, or accepting bribes, kickbacks, or facilitation payments, whether directly or indirectly through a third party. This Policy builds upon the requirements in TriNet's Code of Business Conduct and Ethics ("Code") and is intended to set forth clear guidance to colleagues and contingent workers for compliance with all applicable anti-bribery and anti-corruption ("ABAC") laws and to encourage and provide guidance for reporting any suspected violations.

SCOPE

This Policy applies to all TriNet colleagues and contingent workers. While this Policy is not directly applicable to third parties working on behalf of TriNet, ABAC requirements are separately addressed with them through the Vendor Code of Conduct ("Vendor Code") and are consistent with those provided in this Policy.

Requirements

PROHIBITED CONDUCT

Colleagues and contingent workers are prohibited from engaging in corrupt practices in connection with their work for TriNet. This prohibition includes offering, soliciting, promising, or accepting bribes, kickbacks, or facilitation payments, whether directly or indirectly through a third party.

Bribery occurs when something of value is offered or accepted for the purpose of influencing a business decision or securing any kind of improper advantage. Bribes may include, but are not limited to, gifts, entertainment, hospitality, or travel; personal services, favors, or loans; and payments, favors, or benefits to or services for an individual or the individual's relative or friends.

Facilitation payments and kickbacks are types of bribery. A facilitation payment is a payment made to expedite or facilitate the performance of a non-discretionary, routine government action. A kickback is an illegal payment intended as compensation for preferential treatment or any other type of improper services received. However, revenue sharing agreements properly entered into by TriNet entities are not kickbacks.

Facilitation payments and kickbacks, whether legal or not in a given country, are prohibited under this Policy.

EXAMPLES OF POTENTIAL "RED FLAGS"

Examples of conduct that could potentially raise a "red flag" under this Policy includes, but is not limited to:

- Requests for a charitable donation or contribution as a condition of TriNet being considered for a business opportunity;
- A proposed agent or third party representative refusing to provide written assurances to TriNet that they will not make any improper payments;
- Requests for, or offers to establish, a revenue-sharing agreement or arrangement for your own benefit related to referrals you might make to another entity; and/or
- Requests for, or offers to provide, a facilitation payment.

INTERACTIONS WITH GOVERNMENT OFFICIALS

Colleagues' and/or contingent workers' interactions with government officials on behalf of TriNet can raise additional concern from an ABAC perspective. For that reason, all interactions with government officials must comply with this Policy, the Code, the Gifts and Entertainment Policy, and with all applicable laws, rules, and regulations.

Interactions with government officials must adhere to TriNet's commitment to act in compliance with the highest ethical standards and to conduct business honestly and legally. Colleagues and contingent workers should be mindful of engaging in any conduct that might even create the appearance of impropriety regardless of whether there is any improper intent. Consistent with the Gifts and Entertainment Policy, any gift or entertainment offered to a government official or agency in a work-related context (regardless of the source of funds used) must be reviewed and approved in writing in advance by the Chief Compliance Officer ("CCO") or their designee. This process can be initiated by submitting the applicable disclosure form found in the [Speak Up Hub Disclosures Platform](#). When seeking reimbursement for an approved gift or entertainment to a government official, or when seeking reimbursement for a meal with such an official, the colleague and/or contingent worker seeking reimbursement from TriNet must submit an itemized receipt for the meal, gift, or entertainment in their reimbursement request and also identify the recipient(s).

However, a colleague may provide a gift or entertainment to a government official without approval of the CCO or their designee in instances where the gift or entertainment is (i) provided in the colleague's personal capacity **and** (ii) based specifically on a **pre-existing** personal or familial relationship unrelated to TriNet business activities. Gifts or entertainment to a government official that are provided by a colleague in their personal capacity based on a personal relationship that has developed pursuant to the colleague's interactions with the government official on behalf of TriNet are **not** permitted. If a colleague has any doubts as to whether a gift may be given to a government official, they must complete and submit the Speak Up Hub Disclosure form discussed above.

GIFTS, ENTERTAINMENT, AND OTHER BUSINESS COURTESIES

The circumstances in which it is appropriate to give or receive a gift, entertainment, or other business courtesy are governed by the Gifts and Entertainment Policy. As stated therein, colleagues and contingent workers should never offer a gift, entertainment, or other business courtesy to obtain or retain an improper business advantage for TriNet. To that end, colleagues and contingent workers

must not offer, give, promise, solicit, or accept any gift, entertainment, business courtesy, or any other thing of value to or from any person:

- Which could be regarded as illegal or improper, or which violates the recipient's policies; or
- Which was intended to improperly affect or influence the outcome of a business transaction; or
- Which could be regarded as affecting a business transaction.

INTERACTIONS WITH THIRD PARTIES

As noted above, because ABAC laws prohibit both direct and indirect offers and payments, TriNet, a colleague(s), and/or a contingent worker(s) could be held liable for the conduct of third parties, such as TriNet's agents, business partners, and vendors, when we know or reasonably should have known of the unlawful conduct. Turning a "blind eye" or ignoring "red flags" that something may be wrong does not exonerate you or the company from liability. Authorizing a third party to do something that you cannot do directly is a violation of this policy. For these reasons, colleagues and/or contingent workers engaging with third parties are expected to exercise a reasonable degree of oversight of these third parties and appropriately monitor their TriNet-related activities.

Consistent with TriNet's Procurement Policy, Procurement must review and approve all purchases and/or contracts for goods and services, except as outlined in the Procurement Policy. Procurement's involvement in such activities helps to ensure that appropriate due diligence is conducted on such third parties seeking to do business with TriNet. All third parties engaged by TriNet to provide goods or services require a valid and approved contract, which has been approved by an appropriate party as defined by the Procurement Policy. Contracts with such third parties must contain ABAC representations and warranties consistent with this Policy and the Vendor Code.

BOOKS AND RECORDS REQUIREMENTS

All financial or other information relating to TriNet or its business activities must be recorded honestly, accurately, and objectively, and in a fashion which properly reflects the matters or transactions in which they relate. It is never appropriate to falsify records or misrepresent facts, such as to hide an otherwise illegal or improper transaction. Payments should not be made on behalf of TriNet without adequate supporting documentation and an understanding of the purpose of the payment, which must relate to a legitimate business purpose.

CHARITABLE CONTRIBUTIONS

TriNet makes charitable donations to improve our communities and support legitimate charitable causes and not as an exchange of favors or in return for an expectation of reciprocity from a charity, its officers, or members of its board. Approved contributions should be made through TriNet's Corporate Social Responsibility ("CSR") Program and the TriNet Foundation. Charitable contributions made through TriNet's CSR program and the TriNet Foundation will only be made in accordance with applicable law, and all required public disclosures for such contributions must be made.¹ Additionally, any contributions made must be accurately described in TriNet's books and records.

No charitable contributions may be made to foreign political parties or committees, individual foreign politicians, or candidates for office without prior written approval of the CCO. In addition, under no

¹ Additional information on TriNet's CSR Program is available in the CSR Source page [here](#).

circumstances may a contribution be paid at the behest of a foreign official or to an organization affiliated with a foreign official or their family members without the prior written approval of the CCO. If a contribution is made, it must be accurately described in TriNet's books and records.

OBLIGATION TO REPORT ACTUAL OR SUSPECTED VIOLATIONS

Colleagues and contingent workers are required to prevent, detect, and report bribery and corruption occurring within or related to TriNet's business activities. If a colleague or contingent worker becomes aware of actual or suspected bribery or corruption occurring, they should immediately report the issue to:

- Their supervisor;
- A senior member of management above the supervisor's job level, particularly if the supervisor is the individual who allegedly violated this Policy;
- The People Business Partner ("PBP") supporting the colleague's business area;
- A member of TriNet's People Success team; and/or
- Business Conduct and Ethics ("BC&E"), confidentially and/or anonymously:
 - Via email at
 - ethics@trinet.com
 - chiefcomplianceofficer@trinet.com
 - Online: <https://speakup.trinet.com>
 - Phone: 800.461.9330
 - Textline: 925.316.1671

If a supervisor, another member of management, and/or a representative of the People Team is notified about actual or suspected bribery or corruption occurring within TriNet's business activities, they should immediately notify BC&E using the contact information above or by directly contacting a member of the BC&E team.

Exceptions

No exceptions to this Policy will be considered or granted.

Accountability

Colleagues and Contingent Workers are responsible and accountable for abiding by this Policy and all other policies and standards applicable to their job function.

Colleagues who do not comply with this Policy or related corporate policies, procedures, and/or standards may be subject to corrective action, up to and including termination of employment.

Document History and Version Control

This policy is maintained in accordance with the TriNet Policy Governance Framework. The policy should be reviewed at least annually or when necessary, based on material changes to the operating environment, potential changes to regulations and contractual requirements, or other similar events.

OWNERSHIP AND AUTHORITY

Version	Date	Author	Owner	Change
1.0	May 22, 2024	Michael Kraft, Managing Counsel, BC&E	Doug Riegelhuth, CCO	Initial version.
1.1	March 5, 2025	Michael Kraft, Managing Counsel, BC&E	Doug Riegelhuth, CCO	Revisions as part of annual review.
1.2	May 22, 2025	Michael Kraft, Managing Counsel, BC&E	Doug Riegelhuth, CCO	Non-substantive change to update Speak Up Hub textline

APPROVAL AND SIGN OFF

Version	Approver	Final Approval Date
1.0	Doug Riegelhuth, CCO	May 22, 2024
1.1	Doug Riegelhuth, CCO	March 5, 2025
1.2	--	May 22, 2025

Appendices

DEFINITIONS

Bribery - As defined above, a bribe occurs when something of value is offered or accepted for the purpose of influencing a business decision or securing any kind of improper advantage. Bribes may include, but are not limited to, gifts, entertainment, hospitality, or travel; personal services, favors, or loans; and payments, favors, or benefits to or services for an individual's relative or friends.

Colleague - Regular full-time and part-time employees who work directly for TriNet (a.k.a., TriNet corporate colleagues), including interns.

Contingent Workers - A contract worker who performs work for TriNet and is not a TriNet colleague, such as Agency Temps, Independent Contractors / Consultants, and Contractor Resources, as defined in the TriNet Contingent Worker Policy.

Corruption - As defined above, the abuse of entrusted power for personal gain. Bribery and fraud are examples of corrupt practices.

Facilitation Payment - A payment made to expedite or facilitate the performance of a non-discretionary, routine government action.

Government Official - a government official is:

1. An officer or employee of any local, provincial, or national government, including agencies. Examples include, but are not limited to, members of parliament, police officers, firefighters, members of the military, tax authorities, customs inspectors, food and drug regulators, etc.
2. A director, officer, representative, agent, or employee of any government-owned or controlled business or company.
3. Any person with the responsibility to allocate or influence expenditures of government funds, including persons serving in unpaid, honorary, or advisory positions.
4. An officer or employee of a public international organization. Examples include, but are not limited to, the United Nations, International Olympic Committee, and the International Red Cross.
5. Any person acting in an official capacity or on behalf of any government or public international organization.
6. Any officer or employee of a political party.
7. Any candidate for political office.
8. A close relative (e.g., parent, sibling, spouse, or child) of any of the above.

Kickback - An illegal payment intended as compensation for preferential treatment or any other type of improper services received.

Third Parties - Individuals or entities that do business with or seek to do business with TriNet, including clients, customers, prospects, or vendors.

RELATED DOCUMENTS

Document Type	Document Title
Code	Code of Business Conduct and Ethics
Policy	Conflict of Interest Policy
Policy	Gifts and Entertainment Policy
Policy	Procurement Policy
Code	Vendor Code of Conduct