

# Human Rights & Labor Standards Policy

## Introduction

### PURPOSE

TriNet is committed to respecting the human rights and dignity of all persons throughout our operations, supply chain, and the communities in which we operate.

### SCOPE

TriNet's Vision is to become the most trusted advisor to small and medium-sized businesses. We believe that our Mission - to power the success of small- and medium- sized businesses by supporting their growth and empowering their people - can promote human rights through our services. We are committed to protecting the global TriNet workforce by ensuring access to fundamental rights and freedoms and fully respecting and engaging every colleague.

TriNet acknowledges, and expects its vendors to uphold through policy adoption and adherence, internationally recognized human rights principles, such as those contained within the United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, as well as labor standards contained within the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, and the Organization for Economic Co-Operation and Development's (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct.

Our approach to human rights begins with understanding how our services and related business activities may impact our global stakeholders (which include our colleagues, clients, worksite employees, shareholders, vendors, communities in which we operate, and suppliers). TriNet seeks to ensure that the rights of our stakeholders are respected and promoted through recognition of the inherent dignity and equal rights of all persons, and that those fundamental human rights are not infringed or disregarded, directly or indirectly, by our own business activities or those of our vendors and suppliers.

TriNet commits to develop colleague training on international standards of human rights and labor standards; to adopt programs to identify and address specific human rights issues faced in our business and industry; to solicit relevant stakeholder involvement in further developments of this Policy; and engage relevant stakeholders in evaluating the effectiveness of outcomes.

In the event of any conflict between this Policy and the requirements of applicable law, TriNet will seek ways to respect international human rights while also complying with the law.

This Policy is applicable to all full-time and part-time employees and contingent workers of TriNet Group, Inc. including its wholly owned subsidiaries ("TriNet" or the "Company"). TriNet also expects our vendors, suppliers, and third-party contractors to

adopt similar policies and uphold these principles in compliance with the Company's Supplier Diversity Policy and Vendor Code of Conduct.

## Human Rights Principles

TriNet's recognition and promotion of human rights focuses on the following areas.

- **INCLUSION, DIVERSITY AND PROHIBITION AGAINST DISCRIMINATION AND HARASSMENT:** TriNet expressly prohibits any form of discrimination and harassment in the workplace, including harassment based on sex, race, disability, ethnicity, nationality, religion, age, sexual orientation, gender identity or gender expression, and any other personal characteristic protected under the applicable national or local laws where we operate. TriNet takes all reasonable steps to educate its workforce on these prohibitions, prevent workplace discrimination and harassment, promptly address any discriminatory or harassing behavior, and implement immediate and appropriate corrective action when necessary.
- **NON-RETIATION:** TriNet prohibits retaliation against any colleague or contingent worker who in good faith raises a concern about, participates in an investigation or other proceeding relating to, or otherwise opposes/refuses to engage in, any potential or actual misconduct or wrongdoing under this Policy.
- **RIGHTS OF WOMEN AND OTHER HISTORICALLY UNDERREPRESENTED PEOPLE:** TriNet recognizes that around the world many historically underrepresented people, including women, face discrimination, disadvantage, lack access to education, and often lack protection of basic rights and laws. TriNet is committed to working with non-profit organizations which seek to mitigate or eradicate these unjust historic practices.
- **RIGHT TO WATER:** TriNet acknowledges that access to clean water is a fundamental human right and indispensable for leading a life that facilitates and expands human dignity.
- **ANTI-SLAVERY AND HUMAN TRAFFICKING:** TriNet and its vendors and suppliers are prohibited from using forced or compulsory labor, whether slave, prisoner, indentured, bonded or otherwise. Similarly, TriNet will not traffic workers or exploit workers through threats, force, coercion, abduction, or fraud.

TriNet's vendors and suppliers are also expected to refrain from such practices. Workers must be free to voluntarily terminate their employment or other work status without monetary cost or imposition of unreasonable or coercive conditions or tactics that prohibit the right to transfer their labor.

- **PEACEFUL ASSEMBLY AND ASSOCIATION:** TriNet acknowledges that all persons have the right to peaceably assemble and associate with individuals and organizations of their own choosing, and that no one may be compelled to join or belong to an association.
- **INDIVIDUAL PRIVACY AND DATA SECURITY:** TriNet is committed to respecting the privacy of all individuals, including colleagues, worksite employees and our customers. We follow appropriate privacy principles, comply with all applicable laws governing privacy of persons and data, and have implemented robust and comprehensive privacy policies and mitigation

frameworks across our organization. TriNet utilizes lawful, reasonable and appropriate practices in our collection, use, and sharing of personal information about individuals.

## Labor Standards

TriNet recognizes that compliance with universal minimum standards of labor rights are fundamental key components of promotion of global human rights. We acknowledge the existence of international standards such as those propounded by certain ILO conventions, which inform our approach to our global labor and employment policies and practices.

- **CHILD AND FORCED LABOR:** TriNet does not utilize child labor, will not employ anyone under the age of 16 years old, and will not employ any person under age 18 in hazardous work. TriNet supports efforts of governmental and non-governmental organizations to eradicate and abolish child labor.
- **HEALTH AND SAFETY:** TriNet complies with all applicable safety laws and regulations in the locations where we operate and is committed to supporting colleagues' physical, financial, and mental health through various programs and benefits made available to colleagues and their families. TriNet's vendors and suppliers similarly must comply with applicable laws that require safe working conditions.
- **WAGES AND BENEFITS:** TriNet pays fair wages and utilizes market- and geographic-based benchmarking practices to ensure that our compensation programs and components remain attractive and competitive. TriNet complies with all applicable wage and hour laws in the locations we conduct business, and we strive to create work/life balance for our colleagues through a variety of paid time off policies and widely recognized paid holidays.
- **FAIR TREATMENT:** All workers must be treated with dignity and respect. TriNet prohibits physical, verbal, and psychological abuse and bullying.
- **IMMIGRATION COMPLIANCE:** TriNet will only engage workers who have a legal right to work in the location where they seek to be employed. We comply with all applicable immigration laws in the locations where we operate. TriNet expects vendors and suppliers to similarly comply with all relevant immigration laws where they operate.
- **FREEDOM OF ASSOCIATION AND GOOD FAITH BARGAINING:** TriNet respects our colleagues' right to establish and join any legal organization of their own choosing, and to decline to join or associate with any organization. We respect and comply with applicable laws requiring good faith bargaining with freely chosen representatives of legally recognized labor unions. TriNet prohibits any form of intimidation or retaliation against colleagues or their chosen representatives for exercising these rights.

## Governance

TriNet's Chief Executive Officer has responsibility for this Human Rights and Labor Standards Policy. TriNet's Chief Compliance Officer has operational oversight of this Policy. Accountability for implementation of this Policy is shared among members of TriNet's Executive Leadership team. Every TriNet colleague is responsible for adherence to and compliance with this Policy.

## Monitoring and Reporting

TriNet has several reporting mechanisms for colleagues and contingent workers to report concerns and potential violations of this Policy. TriNet monitors its operations for potential violations and takes prompt remedial action when violations occur. Remedial measures may include employment termination, or termination of vendor, supplier, or contingent worker contracts, as applicable.

Colleagues and contingent workers can report any incidents or concerns 24 hours per day, 7 days per week through the following methods:

- **Email:** [ethics@trinet.com](mailto:ethics@trinet.com)
- **Email our CCO directly:** [chiefcomplianceofficer@trinet.com](mailto:chiefcomplianceofficer@trinet.com)
- **Report online:** Through our third-party [Speak Up Hub](#)
- **Report by phone:** (800) 461-9330

## 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
01.00	9/29/2022	Doug Riegelhuth, CCO, Legal Compliance & Business Affairs	Doug Riegelhuth, CCO, Legal Compliance & Business Affairs	
01.5	8/01/2023	Doug Riegelhuth, CCO, Legal Compliance & Business Affairs	Doug Riegelhuth, CCO, Legal Compliance & Business Affairs	Format Updated by: Erin Webster
02.00	11/8/2024	Amanda Farooqi, Jennifer Owens, Boyd Rogers, Holly Mitchell	Kalin Light, Divisional Vice President, People Strategy and Success	Clarifies vendor expectations and recognized human rights principles.

## APPROVAL AND SIGN OFF

Version	Approver	Final Approval Date
01.00	<i>Doug Riegelhuth, CCO, Legal Compliance &amp; Business Affairs</i>	9/29/2022
02.00	<i>Kalin Light, Divisional Vice President, People Strategy and Success</i>	11/8/2024