

# Regulatory Affairs Policy

## Introduction

### PURPOSE

Like many companies, TriNet engages in public policy advocacy on issues that impact our business at the federal, state and local levels. We believe that participating in the legislative process enables us to be advocates for our business and for our small-to-medium sized business clients. We also believe that public policy advocacy is an important part of responsible corporate citizenship.

### SCOPE

This policy guides TriNet Group, Inc. (the “Company” or “TriNet”) in public policy advocacy. This policy covers all public policy strategy and advocacy, and all engagements with government officials, and policy- and law-makers, when done on behalf of TriNet or our clients. This policy applies to all TriNet colleagues, including any full-time employees, part-time employees and interns. Other TriNet policies may also apply.

The Company’s Regulatory Affairs team is responsible and accountable for managing all activities within the scope of this Policy. The head of Regulatory Affairs reports to the Chief Legal Officer who, in turn, reports to the Chief Executive Officer of TriNet.

## Requirements

### CORPORATE CONDUCT

The Company participates in the public policy arena on a wide range of issues that may impact the Company and its clients. **Members of TriNet’s Regulatory Affairs team are the only individuals authorized to approve statements, advocacy, or engagement with government officials and policy- and law-makers on behalf of TriNet.** The Regulatory Affairs team may request that others assist in these efforts, and if they do so request, the Regulatory Affairs team will guide such activities.

The Regulatory Affairs team will monitor regulatory activity, advance our policy priorities, and build strong relationships with government officials and policy- and law-makers at all levels. The team will do this in part by working closely with industry peers through trade associations and other similar common interest groups. The Company makes payments to these associations in the form of membership dues and other fees. The Company also retains contract lobbyists to assist in its efforts to pursue a favorable regulatory environment.

### COLLEAGUE CONDUCT

Use of TriNet resources for the support of political parties or candidates for any office (federal, state, or local) or any government official from the United States or any foreign country is strictly prohibited other than as directed by the Regulatory Affairs team in pursuit of TriNet’s goals. Prior to inviting a

government official, policy- or law-maker to speak at a TriNet event, approval from the TriNet Regulatory Affairs team is required. Similarly, as detailed in the Code of Business Conduct and Ethics ("Code"), no colleague may authorize or participate in any payment or gift of any TriNet resources to any government official or agency for any purpose unless approved by the Chief Compliance Officer ("CCO") in writing in advance by contacting the Business Conduct and Ethics ("BC&E") team at [ethics@trinet.com](mailto:ethics@trinet.com).

## **TriNet PAC**

TriNet engages in corporate political contributions via the nonpartisan TriNet Political Action Committee (PAC), which is funded by voluntary contributions from eligible colleagues.

The PAC exists for the sole purpose of educating, supporting, and creating strong relationships with federal and state legislators and regulators to promote policies that support the Company and the small and medium-sized businesses we serve.

The PAC is the only vehicle the Company uses for corporate contributions to political parties or candidates. PAC activities must be approved by the TriNet PAC Board and the Chief Compliance Officer.

The PAC provides reports to the Federal Elections Commission and to state agencies as required by local law. PAC contributions must comply with applicable law.

## **Accountability**

Anyone who violates this policy is subject to corrective action, up to and including termination of employment with TriNet.

## **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	August 23, 2021	Daniel Harris, Director & Senior Counsel, Government Relations	Lisse Kravetz, Vice President, Associate General Counsel-Regulatory Affairs	Initial publication
02.00	September 22, 2022	Daniel Harris, Director & Senior Counsel, Government Relations	Lisse Kravetz, Vice President, Associate General Counsel-Regulatory Affairs	N/A
03.00	November 1, 2023	Daniel Harris, Director & Senior Counsel, Government Relations	Lisse Kravetz, Vice President, Associate General Counsel-Regulatory Affairs	Updated company branding

## APPROVAL AND SIGN OFF

Version	Approver	Final Approval Date
01.00	Lisse Kravetz, Vice President, Associate General Counsel-Regulatory Affairs	August 23, 2021
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