

## AUTOMATIC DATA PROCESSING, INC. CODE OF BUSINESS CONDUCT & ETHICS

### FREQUENTLY ASKED QUESTIONS

Revised: April 8, 2020

#### I. Conflict of Interest

**Q. MAY A BUSINESS OWNED BY AN ADP ASSOCIATE, OR HIS OR HER FAMILY, FRIENDS OR SIGNIFICANT OTHER, SELL ITS PRODUCTS OR SERVICES TO ADP?**

**Generally, no**, as this can create an actual or perceived conflict of interest. You must avoid any personal activity, investment, or association which could appear to interfere with good judgment concerning ADP's best interests. You may not exploit your position or relationship with ADP for personal gain and/or cause ADP to engage in business transactions with your relatives or friends.

With the written approval of ADP Global Ethics, however, limited exceptions may be made, primarily in situations where the proposed services are essential to ADP, and there are no other reasonable and acceptable suppliers. If such an exception is granted, you may not have any involvement in (i) ADP's operations or decision-making process regarding that business, and (ii) that business's provision of services/products to ADP.

**Q. MAY A BUSINESS OWNED BY AN ADP ASSOCIATE, OR HIS OR HER FAMILY, FRIENDS OR SIGNIFICANT OTHER, PURCHASE AND UTILIZE ADP PRODUCTS OR SERVICES?**

**Yes**, as long as the related associate has no part in the negotiation, sale, implementation and/or service of the products or services and receives no compensation or thing of value for the sale other than what the associate would have received if they had no relationship with the client. In addition, the related associate must not be in a position where he/she can access the ADP system(s) that contain the client data at issue.

**Q. MAY AN ASSOCIATE MOONLIGHT AT ANOTHER JOB?**

**Yes**, provided that the "moonlighting" does not interfere with or affect the associate's work at ADP, does not create a conflict of interest, does not interfere with the associate's good judgment concerning ADP's best interests, and the associate obtains the written permission

of his or her Supervisor. Notwithstanding, no ADP associate may be an employee, consultant, director, or officer of, or otherwise be affiliated with, any vendor, client, or competitor without prior written approval of ADP Global Ethics.

In all cases, ADP associates must always avoid any personal activity, investment, or association that conflicts with good judgment concerning ADP's best interests or creates even the appearance of such a conflict.

**Q. MAY AN ASSOCIATE SIT ON A BOARD FOR A NON-PROFIT OR ANOTHER COMPANY?**

**Yes**, unless it creates a conflict of interest. If you are interested in accepting a position on a board, you must first speak with ADP Global Ethics to determine if there is a conflict of interest.

**Q. MAY THE SPOUSE OF AN ASSOCIATE WORK FOR A COMPETITOR?**

**Yes.** However, the parties must be diligent in not sharing confidential information about their respective companies with each other, as this would be a clear violation of ADP policies.

## **II. Compliance with Law**

**Q. WHAT IF YOU ARE CONCERNED THAT A LOCAL LAW CONFLICTS WITH ADP POLICIES?**

You are expected to comply with all applicable laws, rules and regulations. If you have questions or are not sure if an ADP policy, process or procedure violates any law, you should immediately contact the Legal Department for guidance.

## **III. Gifts, Bribes and Kickbacks**

**PLEASE SEE THE ADP ANTI-BRIBERY FAQs.**

## **IV. Loans**

**Q. IF AN ASSOCIATE HAS AN UNEXPECTED PERSONAL EXPENSE, CAN THE ASSOCIATE RECEIVE A CASH ADVANCE ON HIS/HER NEXT PAY CHECK?**

**No.** An associate may not provide, facilitate, approve, request or accept a loan or payroll advance from ADP, other than loans that may be permitted on a case-by-case basis in connection with an associate's relocation pursuant to the policies of ADP's Global Mobility Department or some other company-approved program.

## **V. Improper Use or Theft of ADP Property**

### **Q. IS IT UNETHICAL FOR AN ASSOCIATE TO TAKE STATIONERY SUPPLIES OR OTHER ADP PROPERTY FOR HIS OR HER PERSONAL USE?**

**Yes**, that is stealing. Every associate must safeguard ADP property from loss or theft and may not take such property for personal use. ADP property includes, but is certainly not limited to, confidential information, software, computers, personal devices, cell phones, office equipment, and supplies. Furthermore, you must appropriately secure all ADP property within your control to prevent its unauthorized use or theft. Using ADP computers or communications systems to access or distribute personal/non-business-related information, except where allowed, is also prohibited.

### **Q. IS IT UNETHICAL TO SEND JOKES OR PERSONAL MESSAGES TO FELLOW ASSOCIATES BY E-MAIL?**

While it is not necessarily unethical (depending on the content of the message), such action may violate the Acceptable Use of Electronic Communications and Data Protection Policy, which states that non-business use of the e-mail system is acceptable but only if the level of use is occasional and does not interfere with an associate's professional responsibilities or diminish productivity. In addition, depending on the nature of the joke or personal message, you may be violating ADP's Harassment, Discrimination, and Retaliation Policy and/or the law.

In addition, associates must take precautions to prevent the spread of viruses within ADP's communication systems as the result of information received via email or retrieved from the Internet.

Incoming email messages that violate the provisions of the Acceptable Use of Electronic Communications and Data Protection Policy must be deleted immediately. If incoming e-mail contains information that violates the Policy, the recipient is required to send an e-mail requesting the sender to cease sending such mail to the recipient's address. If the recipient is having difficulty getting someone to stop sending inappropriate e-mail, the recipient should immediately notify a supervisor or Human Resources.

## VI. Covering Up Mistakes; Falsifying Records

### **Q. IS IT UNETHICAL FOR A SALES ASSOCIATE TO DIAL/CALL TELEPHONE NUMBERS THAT ARE NOT FOR PROSPECTS OR CLIENTS TO IMPROVE HIS OR HER CALL STATISTICS?**

**Yes.** It is fraud and you will be subject to disciplinary action up to and including termination of employment.

### **Q. ARE ASSOCIATES RESPONSIBLE FOR MAINTAINING ACCURATE ETIME RECORDS?**

**Yes.** If you suspect that your eTime records in the system are inaccurate, you are obligated to contact your manager or HR to correct your time records. Inputting and/or submitting false information regarding hours worked or vacation time is fraud and will result in disciplinary action up to and including termination of employment.

### **Q. IS IT UNETHICAL FOR AN ASSOCIATE TO CHANGE RECORDS OR LIE TO CLIENTS TO MAKE IT APPEAR THAT ADP DID NOT MAKE AN ERROR?**

**Yes.** Mistakes should never be covered up, but should be corrected immediately. Falsification of any ADP, client, or third-party record is prohibited, even if the purpose was to "protect" ADP, or to increase ADP's revenue or profit.

### **Q. CAN AN ADP ASSOCIATE WHO IS A VALID NOTARY PUBLIC, NOTARIZE A CLIENT DOCUMENT IF THE PERSON DOES NOT SIGN THE DOCUMENT IN HIS/HER PRESENCE?**

**No.** The purpose of a Notary Public is to have a witness who legally verifies the authenticity of the signature on a document. Therefore, the Notary Public must be present and watch the person sign the document. The Notary Public should never notarize a document that a third party presents to them and claims that the signature on the document is valid.

## VII. Protection of ADP, Client and Vendor Information

### **Q. MAY AN ASSOCIATE USE OR PROVIDE ADP INFORMATION THAT HE OR SHE SEES IN THE NORMAL COURSE OF THEIR DUTIES AT ADP IN A COURT PROCEEDING?**

Much of the work we do involves ADP's and our clients' confidential and proprietary information, which must be handled in accordance with ADP's Security, Risk and Privacy Policies and ADP's Intellectual Property Policy. Before disclosing any ADP confidential or

proprietary information as part of a court proceeding, you must consult with the Legal Department.

## **VIII. Gathering Competitive Information**

### **Q. IF A COMPETITOR'S EMPLOYEE POSTS AN ARTICLE ON SOCIAL MEDIA THAT IS PERTINANT TO SERVICES PROVIDED BY ADP, CAN I USE THE ARTICLE?**

You can “share” the article, as long as it is clear who wrote the article. You cannot “publish” the article on social media and make it appear that you are the author of the article since that would be plagiarism, which will result in disciplinary action up to and including termination of employment.

## **IX. Sales Defamation and Misrepresentation**

### **Q. IS IT UNETHICAL TO ELECTRONICALLY CUT AND PASTE A CLIENT'S OR PROSPECT'S SIGNATURE FROM ONE DOCUMENT TO ANOTHER?**

**Yes.** Electronically cutting and pasting a signature is forgery and will result in the termination of employment. Forgery is a crime, which may also subject an associate to criminal charges.

### **Q. TO EXPEDITE A BUSINESS DEAL, MAY AN ADP ASSOCIATE SIGN A CLIENT'S NAME TO A CONTRACT, TAX FORM OR OTHER DOCUMENT?**

**No.** There are no exceptions, even if the client requests that his or her name be signed. Such action will subject an associate to disciplinary action up to and including termination of employment and may lead to criminal prosecution.

### **Q. CAN ROLL CALL AND COMMISSION BE TRANSFERRED FROM ONE SALES ASSOCIATE TO ANOTHER TO ASSIST THE LATTER IN QUALIFYING FOR PRESIDENT'S CLUB?**

**No.** Sales credit must be assigned in accordance with Sales commission policy. Associates who split or trade deals to benefit another associate will be subject to disciplinary action up to and including termination of employment.

### **Q. WHAT IF A SALES ASSOCIATE MAKES A MISTAKE OR FORGETS TO INCLUDE A PRODUCT OR SERVICE ON THE SALES ORDER THAT WAS DISCUSSED WITH THE**

### **CLIENT? CAN THE SALES ORDER BE CHANGED WITHOUT APPROVAL FROM THE CLIENT?**

**No.** The sales associate must correct the mistake or omission and have the client/prospect sign another sales order or initial each change to the original sales order. A sales order is a legal contract and the client must consent to and approve any change to a document. Legal action may be brought against ADP and the associate if proper contract procedures are not followed.

### **Q. IS IT UNETHICAL TO EXAGGERATE OR FABRICATE BENEFITS OF ADP PRODUCTS IN ORDER TO SECURE A SALE?**

**Yes.** Sales associates should always seek to provide high value products and services, best suited to a client's or prospect's request or needs. It is each associate's obligation to ensure that clients and prospects are not offered products or services that have no beneficial value to the client or are not well suited to the client's or prospect's business needs. Selling must never include misstatements or lies about ADP products and services, or about client's or prospect's needs. Spreading rumors, even indirectly, about our competitors, their products or their financial condition is also strictly prohibited.

### **Q. WHAT ARE SOME UNETHICAL PRACTICES THAT SALES ASSOCIATES AND SALES MANAGEMENT SHOULD AVOID?**

- Fraudulent Client/Prospect Activity – Fabricating companies to appear as ADP Clients is illegal, unethical and strictly prohibited.
- Starting payroll and other products for existing companies either without their knowledge or while knowing the company has no intention of continued processing past the period necessary to generate sales credit and/or commissions.
- Running "dummy" payrolls for the sake of avoiding a "technical no start."
- Having the client sign blank sales orders.
- Split-wrapping the payroll without the client's knowledge.

- Over roll-calling and rounding up inappropriately. It is the responsibility of the sales leadership team and the Sales Controller to scrutinize any excessive negative sales audits. Examples of over roll calling include the following:
  - Changing processing frequency, adding employees or unwanted features.
  - Roll calling of “full value” with respect to spin-offs, and changes in ownership or tax IDs.
  - Running initial payrolls at higher than actual pay counts.
  - Adding controls when only one is necessary.
- Adding unnecessary reports to an order by deceiving clients into believing they need the product/feature or have to take the “package” since that is the only way ADP will sell it.
- Exchange of existing Management Reports (MRs), i.e., inducing a client to drop existing MRs and replacing them with virtually identical versions for the purpose of obtaining roll call.
- Obtaining roll call through transferring active clients to new regions and/or products and presenting as new business.
- Last minute surge of sales orders with incomplete paperwork used to obtain sales credit for attainment of various incentives (e.g., President’s Club, compensation, contests, etc.) or to extend the date of client promotional offerings.
- Holding complete sales orders from one week to the next for any purpose (such as to take advantage of a contest period or to manage President’s Club qualification). Once a sales order is complete, it should be roll called.
- Not taking “Hard No Starts” at the point when it is clearly determined that the account will not start. Although the procedure to validate the status of an account will vary by sales team, the intent of all “No Start” procedures is to take a “No Start” as soon as the account is determined to be dead business.
- Improper reassignment of sales credit and roll call.
- A senior sales person taking a higher sales credit / roll call and then paying cash or cash

equivalent to a more junior sales Person for their proper share of the sales credit / roll call.

- Manipulating reporting structures for the purpose of qualifying an associate for President's Club – e.g., assigning a senior sales associate to a trainee in the 4<sup>th</sup> quarter so that the senior sales associate splits the roll call value with the trainee.

## **X. Use of ADP and Third-Party Software**

### **Q. IS IT UNETHICAL OR IMPROPER FOR ASSOCIATES TO SHARE COMPUTER SOFTWARE OR FOR ONE ASSOCIATE TO COPY SOFTWARE TO ANOTHER ASSOCIATE'S COMPUTER?**

**Yes.** ADP and third-party software may be distributed and disclosed only to associates authorized to use it, and to clients in accordance with terms of an ADP agreement. ADP and third-party software may not be copied without specific authorization and may be used only to perform assigned responsibilities. All third-party software must be properly licensed, and you must strictly adhere to the license agreements for such third-party software and all restrictions on disclosure, use, and copying of such software.

### **Q. IF THE SOFTWARE IS FREE AND CAN BE DOWNLOADED AND USED WITHOUT PAYING A FEE, IS IT ACCEPTABLE TO DO IT?**

**No.** Only software that is approved by ADP and intended for business use, such as that available on ADP's Software on Demand site, may be installed on an ADP computer. Associates that download unauthorized software are subject to disciplinary action up to and including termination of employment.

## **XI. Fair Dealing**

### **Q. WHAT IF A SMALL BUSINESS OWNER SAYS THAT HE/SHE IS INTERESTED IN CONTRACTING FOR ADP SERVICES, BUT ENGLISH IS NOT THE CLIENT'S FIRST LANGUAGE AND THE COST FOR THE SERVICE DOES NOT SEEM IN LINE WITH THE NUMBER OF EMPLOYEES?**

An ADP associate should never take unfair advantage of a client, vendor or any third party. A sales associate should only sell products or services that have a beneficial value to the client or prospect.

## **XII. Fair Competition and Antitrust Laws**

### **Q. IS IT UNETHICAL TO HAVE DISCUSSIONS OR TO MAKE AGREEMENTS WITH COMPETITORS REGARDING PRICE OR THE TERRITORIES WHERE ADP WILL MARKET ITS PRODUCTS?**

**Yes.** Not only is it unethical, but it is likely illegal for competitors to have discussions or make agreements about the prices they will charge for their competing products, or about matters that have an effect on price such as production, credit terms, customer or territory allocation, bidding, future plans, or the ways in which the two companies will compete. The following types of competitively sensitive agreements with competitors are almost always illegal, and you must avoid them under all circumstances: price-fixing, customer or territory allocation, and joint refusals to deal with other companies.

### **Q. CLIENT X COMPLAINS TO YOU ABOUT ADP RECRUITING THEIR EMPLOYEES AND ASKS YOU TO ENTER INTO A "HANDSHAKE" OR OTHER AGREEMENT NOT TO HIRE EACH OTHER'S EMPLOYEES. IS THIS OK?**

**No.** A blanket non-solicitation agreement between companies - which means an agreement not to solicit or hire the other parties' employees where there is no other commercial arrangement between the parties - would violate antitrust laws and ADP policy. In cases where companies have a bona fide commercial relationship, the parties may agree to certain limitations on solicitation and hiring, but such restrictions need to be limited only to the employees involved in the parties' commercial relationship and cannot be unreasonably broad. Before entering into an agreement of this sort, a member of the Legal Department must be consulted.

## **XIII. Securities Trading**

### **Q. MAY AN ADP ASSOCIATE PURCHASE THE STOCK OF A COMPETITOR, CLIENT OR VENDOR?**

**Yes,** subject to conditions. ADP's Code of Business Conduct & Ethics prohibits more than a modest financial interest in any ADP competitor, client or vendor. In addition, ADP associates cannot buy or sell securities of any company - including that of a competitor, client or vendor - using material information that is not available to the public, also known as "inside" information. Individuals who give such information to others are as liable as persons who trade securities while possessing such information. Therefore, if you (or anyone who has received information from you) trade in securities of ADP or any of its competitors, clients or

vendors while possessing material non-public information, you may have violated the securities laws. Trading on material non-public information will always be grounds for disciplinary action, up to and including termination of your employment at ADP, and may be grounds for criminal prosecution.

**Q. MAY AN ASSOCIATE PURCHASE AND SELL ADP STOCK AS OFTEN AS HE/SHE WANTS TO?**

**No.** Frequent trading of ADP securities can create an appearance of wrongdoing even if the decision to trade was based solely on public information, such as stock price ranges and other market events. Daily or frequent trading, which can be time-consuming and distracting, is strongly discouraged.

**Q. CAN AN ASSOCIATE HEDGE OR PLEDGE HIS/HER POSITION IN ADP STOCK?**

**No.** Both hedging your position in ADP stock and pledging ADP stock you own to secure a loan (or for any other reason) are prohibited under ADP's Insider Trading Policy.

#### **XIV. Political Contributions**

**Q. CAN AN ADP ASSOCIATE GIVE TO A POLITICAL PARTY OR CANDIDATE OF HIS OR HER CHOICE?**

**Yes,** but only if the contribution:

- a. Is a personal contribution.
- b. Does not use any ADP funds.
- c. Does not use any ADP assets.
- d. Does not use any ADP facility or equipment.
- e. Does not use any ADP associate time.
- f. Does not make any reference to ADP.

Please contact the Legal Department with any further questions.

#### **XV. Record Keeping and Financial Reporting**

**Q. WHY IS IT IMPORTANT TO ACCURATELY RECORD EXPENSES?**

Anti-bribery laws require ADP to maintain its books, records and accounts in reasonable detail that accurately reflect all transactions and dispositions of its assets. No expense may be incurred with the express or implied agreement that it is to be used for any other purpose other than what is recorded.

**Q. CAN A MANAGER INCREASE AN ASSOCIATE'S COMPENSATION BY ALLOWING THE ASSOCIATE TO SUBMIT PERSONAL EXPENSES FOR REIMBURSEMENT THROUGH CONCUR?**

**No.** Associates must ensure that all records, including expenses submitted through Concur, are accurate and only for ADP business purposes. Managers cannot override this legal obligation and cannot give permission to or knowingly allow an associate to submit personal expenses to increase compensation.

## **XVI. Waivers**

**Q. CAN AN ASSOCIATE REQUEST A WAIVER OF ANY OF THE PROVISIONS IN THE CODE OF BUSINESS CONDUCT & ETHICS?**

There is a strict process requiring a vote by the Board of Directors for any request for a waiver and most likely a waiver will not be approved.

## **XVII. Reporting Ethical Violations**

**Q. WHAT SHOULD AN ASSOCIATE DO IF HE OR SHE SUSPECTS THAT A MANAGER OR FELLOW ASSOCIATE IS VIOLATING THE CODE OF BUSINESS CONDUCT & ETHICS?**

If you are aware of or suspect misconduct, you should report it to the appropriate level of management, Human Resources, or the Associate Relations Center of Excellence. You may also report it directly to ADP Global Ethics, the Legal Department or the Audit Committee of the Board of Directors (anonymously, if allowed by local law), as follows:

- Contact the ADP Ethics Helpline by:

Direct phone: 1-973-974-7377 (Accessible from all locations)

Third-Party Helpline Provider, EthicsPoint, a NAVEX company:

Website: [adp.ethicspoint.com](https://adp.ethicspoint.com) (for web reports)

Toll-Free: A list of toll-free numbers by country with the applicable country code can be found on the Associate Portal at [www.adpcorp.com](http://www.adpcorp.com) by following the links for Our Company/Policies & Guidelines/Ethics, Legal Compliance/Reporting Ethical Violations or on ADP's public website at <http://www.adp.com/who-we-are/corporate-social-responsibility/working-with-adp/ethics.aspx>

Email: Send an email to [adp.ethics.helpline@adp.com](mailto:adp.ethics.helpline@adp.com)

Mail: Send a detailed note, with relevant documents, to ADP, Mail Stop #325E, One ADP Boulevard, Roseland, New Jersey 07068; or

- Contact the ADP Legal Department by phone at 1-973-974-5865 and ask to speak to an attorney designated to handle ethics matters; or
- Contact the Audit Committee of ADP's Board of Directors by phone at 1-973-974- 5770; sending a detailed note, with relevant documents, to: ADP Board of Directors, Audit Committee, Mail Stop #405E, One ADP Boulevard, Roseland, New Jersey 07068; or sending an email to [adp.audit.committee@adp.com](mailto:adp.audit.committee@adp.com).

### **Q. WHAT SHOULD AN ASSOCIATE DO IF HE OR SHE SUSPECTS THAT A SENIOR EXECUTIVE IS VIOLATING THE CODE OF BUSINESS CONDUCT & ETHICS?**

You should immediately report your suspicions. Any reports that involve the Chief Executive Officer, Chief Financial Officer, Chief Operating Officer or General Counsel of Automatic Data Processing, Inc. will be immediately communicated to the Chairman of the Board of Directors and the Chairman of the Audit Committee.

### **Q. MAY A SUPERVISOR OR MANAGER RETALIATE OR TAKE ADVERSE EMPLOYMENT ACTION AGAINST AN ASSOCIATE FOR FILING A GOOD-FAITH COMPLAINT WITH THE ETHICS HELPLINE?**

**No**, and if they do their employment will be terminated. Your calls and reports to the ADP Ethics Helpline will be held in strict confidence and each associate has ADP's commitment

that he or she will be protected from retaliation. Any attempt at retaliation is a serious breach of ADP's Code of Business Conduct & Ethics, which should be immediately reported.

## **XVIII. Human Resources Related Issues**

### **Q. DO I HAVE TO PARTICIPATE IN AN INTERNAL ADP INVESTIGATION?**

We expect ADP associates to cooperate in internal investigations. If an associate refuses to participate in an investigation, ADP will reach its conclusions based on the available evidence without the benefit of the associate's input. To the extent permitted by law, ADP will also assess the associate's continued employment based on the associate's failure to cooperate in the investigation.

In addition, any associate who ignores or violates ADP's ethical standards, penalizes a subordinate for trying to follow those standards, willfully or knowingly omits to tell the entire truth during an ethics or other ADP investigation, or obstructs, defeats or attempts to stop an ethics or other ADP investigation, will be subject to disciplinary action up to and including termination of employment.

### **Q. CAN AN ASSOCIATE RECORD CONVERSATIONS OR MEETINGS?**

**No**, it is a violation of ADP's Cell Phones, Cameras and Other Recording Devices Policy to record for any reason conversations, whether in person, over the phone or through some other medium, without the consent of all of the parties to the conversation. In addition, many states have recording laws that require the consent of all parties to a conversation. Lastly, much of the work we do involves ADP's and our clients' confidential and proprietary information, which must be handled in accordance with ADP's Security, Risk and Privacy Policies.

### **Q. WHO SHOULD AN ASSOCIATE CONTACT IF HE/SHE IS THE VICTIM OF, OR WITNESS TO, WORK PLACE VIOLENCE OR THREATS BY A FELLOW ASSOCIATE, CLIENT, VENDOR OR ANY OTHER THIRD PARTY?**

The associate should immediately report the incident to his/her manager, HRBP, Associate Relations Center of Excellence, and/or the GSO at 800-869-7687 or email [Investigations@adp.com](mailto:Investigations@adp.com).

**Q. CAN AN ASSOCIATE BE DISCIPLINED FOR CONSUMING TOO MUCH ALCOHOL AT A COMPANY-RELATED EVENT?**

**Yes.** Associates are required to always exercise good judgment and common sense regarding the consumption of alcohol on those limited occasions when the consumption of alcohol is allowed at company related events. At all other times when working or otherwise engaged in ADP-related activities, regardless of location, alcohol is prohibited. Please see ADP's Substance Abuse Policy for more information about what is and is not permitted.

**Q. IS IT UNETHICAL THAT AN AVAILABLE ADP POSITION WAS NOT POSTED PROPERLY PRIOR TO THE POSITION BEING FILLED?**

This is generally not an ethical violation and not necessarily a violation of ADP's policies or practices, unless the position was not posted for inappropriate reasons, such as discrimination. "Posting" issues should be brought to the attention of your local HR representative, HR senior management or Associate Relations.

**Q. IS IT UNETHICAL FOR A MANAGER TO TREAT AN ASSOCIATE IN A RUDE OR UNPROFESSIONAL MANNER?**

ADP does not condone such behavior, and this type of problem should be brought to the attention of your HR representative, HR senior management or Associate Relations unless, for some significant reason, you don't believe it can be properly handled by the Human Resource Department.

**Q. IS IT UNETHICAL FOR ASSOCIATES TO BE RUDE OR ACT UNPROFESSIONALLY TO FELLOW ASSOCIATES?**

ADP does not condone such behavior, and this type of problem should be brought to the attention of your manager, HR representative, HR senior management or Associate Relations.

**Q. IS IT UNETHICAL FOR A SUPERVISOR OR MANAGER TO GIVE AN ASSOCIATE A POOR PERFORMANCE EVALUATION OR ATTEMPT TO TERMINATE AN ASSOCIATE?**

**No,** provided there was no illegal or discriminatory motive. This type of concern should be brought to the attention of your local HR representative, HR senior management or Associate Relations.



**Q. WHAT IF I HAVE ANY QUESTIONS ABOUT THESE ANSWERS OR ABOUT THE ADP CODE OF BUSINESS CONDUCT & ETHICS?**

Contact the ADP Ethics Helpline at (973) 974-7377 or via email at [adp.ethics.helpline@adp.com](mailto:adp.ethics.helpline@adp.com). We are always happy to help.

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