

# CY23 ADP Golf Platform Update

An update on the ADP Invitational and Hospitality options



## Anti-Bribery Approval for ADP Invitational

This document sets forth the protocol for permissible activities under ADP's Anti-Bribery Program in connection with ADP's new golf marketing program.

This protocol applies to three (3) golf events ADP proposes to host (in New Jersey, Chicago and Atlanta) (each, an "ADP Golf Event") for employees or representatives ("Attendees") of clients, prospects or partners during CY'23. The intent and expectation is that ADP Associates will engage in discussions and/or demonstrations regarding ADP's products and services with Attendees at ADP Golf Events and therefore the expenses incurred by ADP are properly characterized as travel and entertainment rather than gifts. Each ADP Golf Event will include a round of golf with customary in-round competitions, dining & entertainment and participation by ADP sponsored golfers. Each ADP Golf Event will be limited to 80 total participants (including approximately 60 Attendees). ADP Anti-Bribery Committee pre-approval for activities conducted under the golf marketing program is granted subject to **ALL** of the following criteria being met. **In the event any element of the below criteria is not satisfied, the activity may not proceed without further review and approval by ADP's Anti-Bribery Committee.**

1. Clients/prospects/partners may not be invited to more than 2 events per year.
2. No Attendee may attend more than 1 event per year. The same Attendee for the same client or prospect may attend events for up to two (2) successive years if it involves an enterprise client/prospect and the invitations are related to ongoing sales/relationship building cycles, otherwise Attendees may not attend events in successive years.
3. The number of Attendees for any client/prospect/partner cannot exceed 4 in total, although up to 6 is permissible for enterprise clients and partners with multiple ADP clients (such as brokers, accountants and consultants).
4. Clients/prospects/partners cannot be invited to or participate in ADP Golf Events if ADP is under active negotiation for a contract (or renewal/amendment) or if a client/prospect/partner has indicated they are terminating ADP or electing not to enter into an agreement with ADP. Kelly Welch, VP Brand & Advertising, on behalf of ADP's marketing/sales teams is responsible for validating this information for all Attendees.
5. There can be NO expectation of quid pro quo in connection with any Attendee invitation or participation. Kelly Welch, VP Brand & Advertising, on behalf of ADP's marketing/sales teams is responsible for validating this information for all Attendees.
6. No government entities or government officials may be invited. Kelly Welch, VP Brand & Advertising, on behalf of ADP's marketing/sales teams is responsible for validating this information for all Attendees.

## Anti-Bribery Approval for Watch Golf (Hospitality)

**ADP Anti-Bribery Committee pre-approval is also granted for the following activities conducted under the golf marketing program, subject to ALL of the following criteria being met. In the event any element of the below criteria is not satisfied, the activity may not proceed without further review and subject to approval by ADP's Anti-Bribery Committee**

- Individual tickets may not exceed \$1,300 (costs generally range from \$250 - \$1,300 per ticket).
- The guardrails set forth in items above apply to such events, provided however that the hospitality experience and ADP Golf Events are not mutually exclusive, meaning that an invite to one counts toward the limit on invites to the other category of events.
- By way of example, if ADP invites a client/partner/prospect to THE PLAYERS Championship, then they can only receive 1 invite to an ADP sponsored golf event and no Attendee can attend both a hospitality experience and an ADP Golf Event.

**Kelly Welch, VP Brand & Advertising, is responsible for ensuring compliance with and adherence to all of the guardrails set forth in these protocols in connection with ADP Golf Events and/or hospitality experiences.**