

Affirmative Action Policy

It is the policy of Paycom Software, Inc. to provide equal employment opportunities without regard to race, color, religion, sex, national origin, age, protected veteran status, disabled status or any other status protected by applicable law. This policy relates to all phases of employment, including, but not limited to, recruiting, employment, placement, upgrading, demotion or transfer, reduction of workforce and termination, rates of pay or other form of compensation, selection for training, the use of all facilities and participation in all Paycom Software, Inc.-sponsored employee activities. All employment decisions are based only on valid job requirements.

As part of Paycom Software, Inc.'s equal employment opportunity policy, Paycom Software, Inc. will also take affirmative action as called for by applicable laws and executive orders for protected veterans and qualified disabled persons. Chad Richison, president, chief executive officer and chairman of the Paycom board of directors fully supports Paycom Software, Inc.'s equal opportunity and affirmative action policies.

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have or may engage in any of the following: (1) filed a complaint; (2) assisted or participated in an investigation, compliance review, hearing or any other activity related to the administration of any federal, state or local law requiring equal employment opportunity; (3) opposed any act or practice made unlawful by any federal, state or local law requiring equal opportunity; or (4) exercised any other legal right protected by federal, state or local law requiring equal opportunity.

The above-mentioned policies shall be periodically brought to the attention of supervisors. It is the responsibility of each supervisor of Paycom Software, Inc. to ensure affirmative implementation of these policies to avoid any discrimination in employment. All employees are expected to recognize these policies and cooperate with their implementation. Violation of these policies is a disciplinary offense.

Tiffany McGowen, senior executive vice president of HR and Talent Acquisition, is assigned to direct the establishment of and to monitor the implementation of personnel procedures to guide the affirmative action program throughout Paycom Software, Inc.