PAYCOM SOFTWARE, INC.

CODE OF ETHICS AND BUSINESS CONDUCT FOR OFFICERS, DIRECTORS AND EMPLOYEES

1. Our Commitment

The officers, members of the boards of directors ("***Board Members***") and employees of Paycom Software, Inc. ("***Paycom Software***") and its subsidiaries (collectively, the "***Company***") are committed to honesty, just management, fairness, providing a safe and healthy environment and respecting the dignity due everyone. For the communities in which we live and work, we are committed to observe sound business practices and to act as concerned and responsible neighbors, reflecting all aspects of good citizenship.

For our stockholders, we are committed to pursuing sound growth and earnings objectives and to exercising prudence in the use of our assets and resources.

2. Promote a Positive and Safe Work Environment

All employees want and deserve a workplace where they feel safe, respected, satisfied and appreciated. We respect cultural diversity and will not tolerate harassment or discrimination of any kind — especially involving race, color, sex, religion, gender, age, national origin, disability, gender identity or expression, sexual orientation, veteran or marital status, or any other characteristic protected by law.

Providing an environment that supports honesty, integrity, respect, trust, responsibility and citizenship permits us the opportunity to achieve excellence in our workplace. While everyone who works for the Company must contribute to the creation and maintenance of such an environment, our executives and management personnel assume special responsibility for fostering a work environment that will bring out the best in all of us. Supervisors and managers must be careful in words and conduct to avoid placing, or seeming to place, pressure on subordinates that could cause them to deviate from acceptable ethical behavior.

3. Protect Yourself, Your Fellow Employees and the World We Live In

We are committed to providing a drug-free, safe and healthy work environment and to observing environmentally sound business practices. We will strive, at a minimum, to do no harm and where possible, to make the communities in which we work a safer and better place to live. The Company's core values include the protection and advancement of human dignity and human rights and each of us is responsible for compliance with environmental, health and safety laws and regulations. We are committed to a work environment that is free from human trafficking and slavery, which includes forced labor and unlawful child labor. The Company will not tolerate or condone human trafficking or slavery in any part of our organization. Company employees, contractors, subcontractors, vendors, suppliers, partners and others through whom the Company conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery. In addition, we do not ever wish for an employee to undertake an unreasonable physical risk in their job performance or a risk outside the scope of their employment.

4. Keep and Retain Accurate and Complete Records

We must maintain accurate and complete Company records. Transactions between the Company and outside individuals and organizations must be promptly and accurately entered into our books in accordance with generally accepted accounting practices and principles, government requirements, and the Company's system of internal controls. In addition, any Company filings with regulatory authorities must be accurate, understandable and prepared in a timely manner. No one should rationalize or even consider misrepresenting facts or falsifying records. It will not be tolerated and will result in disciplinary action.

The Company's records must be retained according to applicable laws and policies relating to the retention of records. Any records that are potentially relevant to a breach of law, litigation or any pending, threatened or foreseeable, investigation or proceeding must not be destroyed. Any questions regarding records retention should be directed to the Legal Department.

5. Obey the Law

Officers and employees must conduct, and Board Members must oversee, our business in accordance with all applicable laws and regulations, both in letter and in spirit, in the countries in which the Company operates as well as those where our officers, Board Members and employees travel on Company business. Compliance with the law does not comprise our entire ethical responsibility. Rather, it is a minimum, absolutely essential condition for performance of our duties. This Code of Ethics and Business Conduct for Officers, Directors and Employees (this "***Code***") is not intended to cover all applicable laws and regulations. You are expected to familiarize yourself with all laws and regulations relevant to your position with the Company as well as all of our related written policies on these laws and regulations. If there is any question regarding applicable law or regulations, please direct your question to the Company's Chief Legal Officer.

6. Working with the U.S. and Other Governments

Our commitments to business honesty and integrity also carry through to all of our work for federal, state, and local governments, whether we are a direct prime contractor or a subcontractor. There is heightened scrutiny regarding compliance with the rules and regulations applicable to companies doing business with the U.S. and other governments. Many of these governmental requirements are different from, and more strict than, those we encounter in the private sector. The penalties for violating them can be significant. Accordingly, it is critically important we all understand and follow the unique rules related to working with governments; and equally important that we act with the highest levels of integrity, ensuring that our products and services are delivered and administered in a manner that fully complies with applicable laws, regulations, and our contracts.

7. Avoid Conflicts of Interest

A conflict of interest can arise when your personal, outside business or family interests interfere or appear to interfere with your ability to make business decisions in the best interest of the Company. An actual conflict of interest exists when your personal interest and professional

responsibility at the Company conflict, including your ability to remain objective in your role at the Company. A perceived conflict of interest exists when it appears your personal interests may compromise carrying out your professional responsibility at the Company in an objective manner. We seek to avoid any activity that is a conflict of interest or has the appearance of a conflict of interest with the Company.

We also must be scrupulous in our dealings with vendors and contractors when working on government programs because there are strict prohibitions on offering or accepting anything of value that could be construed as being done improperly to obtain or reward favorable treatment under a government contract.

Officers and employees are under a continuing obligation to disclose to their immediate supervisor or the Company's Senior Director of Risk and Corporate Compliance any situation that presents the possibility of a conflict or disparity of interest between the officer, Board Member or employee and the Company. Board Members should disclose any potential conflict to the Chairman of the Paycom Software Board of Directors and obtain a waiver from the Paycom Software Board of Directors before serving on the board of directors of a potential competitor or a customer, vendor or contractor of the Company. Disclosure of any potential conflict is the key to remaining in full compliance with this policy.

If a potential conflict of interest would constitute a "related party transaction" that would be required to be disclosed pursuant to applicable federal securities laws, the terms of the proposed transaction must be reported in writing to the Audit Committee of the Paycom Software Board of Directors (the "***Audit Committee***") for approval. Generally, a related party transaction is a transaction that involves a Paycom Software Board Member or executive officer, directly or indirectly, and the Company that exceeds $120,000 (USD) in amount (or if in another currency, an amount equivalent to $120,000 (USD)). If an officer, Board Member or employee has any questions as to whether a proposed transaction is a "related party transaction," such person should contact the Company's Chief Legal Officer for clarification.

Officers, Board Members and employees should not: (i) take for themselves personally opportunities that are discovered through the use of Company property, information or position; (ii) use Company property, information or position for personal gain; or (iii) directly compete with the Company.

8. Compete Ethically and Fairly for Business Opportunities

We must comply with the laws and regulations that pertain to the provision of our human capital management solution. We will compete fairly and ethically for all business opportunities. In circumstances where there is reason to believe that the release or receipt of non-public information is unauthorized, do not attempt to obtain and do not accept such information from any source. We are committed to avoiding even the appearance of improper information gathering.

If you are involved in Company transactions, you must be certain that, to your knowledge, all statements, communications and representations are accurate and truthful.

With respect to competing for U.S. Government business, a law, known as the Procurement Integrity Act, provides a series of prohibitions designed to protect the integrity of the procurement process by ensuring that competitors for government contracts compete on a level playing field. This is done by safeguarding access to competitive information and imposing post-employment restrictions on certain current and former government employees. Specifically, during a competition, the Procurement Integrity Act prohibits government officials from disclosing to the Company, without written authorization, any other company's bid or proposal information or the government's internal source selection information. Employees are likewise prohibited from improperly seeking or obtaining those types of information. These, and other, prohibitions also restrict employment discussions with current or former U.S. Government personnel involved in competitions in which the Company has an interest.

In addition, officers, Board Members and employees must strictly adhere to all antitrust laws. These laws prohibit practices in restraint of trade such as price fixing and boycotting suppliers or customers. They also bar pricing intended to run a competitor out of business; misrepresenting or harassing a competitor; stealing trade secrets; bribery; and kickbacks.

9. Avoid Illegal and Questionable Gifts or Favors

The sale and marketing of our products and services and the procurement of products and services from third parties should always be free from even the perception that favorable treatment was sought, received or given in exchange for the furnishing or receipt of business courtesies. Officers, Board Members and employees of the Company will neither give nor accept business courtesies that constitute, or could be reasonably perceived as constituting, unfair business inducements or that would violate law, regulation or policies of the Company, or could cause embarrassment to or reflect negatively on the Company's reputation. Employees must always comply fully with the anti-bribery and anti-corruption laws of the countries in which we do business, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act of 2010. Additional information on this topic can be found in our Foreign Business Conduct and Anti-Corruption Policy.

Personal gifts and entertainment offered by fellow employees or persons doing commercial business with the Company may be accepted when offered in the ordinary and normal course of the business relationship. However, the frequency and value of any such gifts or entertainment may not be so excessive that your ability to exercise independent judgment on behalf of our Company is or may appear to be compromised. Accordingly, if you receive or are offered a gift that you believe to have a value in excess of the lesser of (i) 0.5% of your annual base compensation and (ii) $500.00 (USD) in amount (or if in another currency, an amount equivalent to $500.00 (USD)), or entertainment that is in excess of usual and customary levels, by any fellow employee or person providing or offering goods or services to the Company, you must promptly disclose the same to your supervisor who will advise you in writing whether the gift or entertainment is proper, based upon the standards set out in this Code. Any gift or entertainment determined to be improper must be returned, reimbursed or refused by you.

In contrast to the private sector, many governments, including the U.S. Government have strict prohibitions against their employees accepting any business courtesies. With respect to the U.S. Government, business courtesies are broadly defined in the regulations to include anything of value, with only very minor exceptions such as refreshments as described below. Therefore, except

as otherwise expressly permitted by law or regulation, we are prohibited from offering or providing any business courtesy including meals, entertainment, travel or lodging expenses to any U.S. Government employee or representative. Modest refreshments, such as soft drinks, tea, coffee and fruit, offered occasionally in conjunction with business activities may be acceptable. If we deal with representatives of a foreign government or state or local agency, we are responsible for complying with that government's or agency's standards of conduct. Where there is any question as to a particular government's or agency's standards of conduct, you must contact the Legal Department in advance for guidance.

10. Restrictions Regarding Employing Current and Former Government Employees

There are laws and regulations limiting the ability to discuss employment or consulting opportunities with employees of the U.S. Government. Similarly, there are strict prohibitions on the work that certain former government personnel may do for the Company. Therefore, before engaging even in preliminary or information employment conversations with government personnel, you must clear the discussion first with Human Resources and the Company's Chief Legal Officer.

11. Maintain the Integrity of Consultants, Agents and Representatives

Business integrity is a key standard for the selection and retention of those who represent the Company. Agents, representatives and consultants must certify their willingness to comply with the Company's policies and procedures and must never be retained to circumvent our values and principles. Paying bribes or kickbacks, engaging in industrial espionage, obtaining the proprietary data of a third party without authority or gaining inside information or influence are just a few examples of what could give us an unfair competitive advantage and could result in violations of law.

It is not permissible to offer anything of value for corrupt purposes, such as obtaining favorable treatment with a current or prospective customer. Employees are prohibited from offering, giving, soliciting or accepting any bribe or kickback, whether dealing with government officials, political parties or representatives of commercial organizations. "Bribes" includes anything of value, including money, gifts, entertainment or other favors offered, given, solicited or received for an improper purpose. A "kickback" is providing or receiving something of value either to obtain or reward favorable treatment on a government contract or subcontract. There are serious consequences associated with failing to disclose a potential bribe or kickbacks. Concerns or suspected violations should be reported to the Senior Director of Risk and Corporate Compliance.

12. Protect Proprietary Information

Proprietary Company information may not be disclosed to anyone without proper authorization. Keep proprietary documents protected and secure. In the course of normal business activities, suppliers, customers and competitors may sometimes divulge to you information that is proprietary to their business. Respect these confidences. In the event your employment with the Company should terminate, you will surrender to the Company all papers, documents, writings and other tangible property produced by you or coming into your possession by or through your employment (except as it relates to working conditions or wages). You will also surrender to the Company or

delete electronically-stored proprietary Company information, and you agree that all such materials will at all times remain the property of the Company, unless otherwise approved in writing by an executive officer of the Company.

As set forth in the Company's Insider Trading Policy, the Company prohibits the unauthorized disclosure of any Material Nonpublic Information (as defined therein), the misuse of Material Nonpublic Information in securities trading, and the engagement in certain Prediction Market Transactions (as defined therein). The Company has established procedures for releasing material information in a manner that is designed to achieve broad public dissemination of the information immediately upon its release. Officers, Board Members and employees may not, therefore, disclose such information to anyone outside the Company, including family members and friends or on any internet-based forum, other than in accordance with those procedures. You should carefully review the Company's Insider Trading Policy and abide by the guidelines set forth in the policy before engaging in any transactions involving the Company's securities.

There are also unique procedures to be followed to protect our proprietary information when providing Company technical data or computer software to the U.S. Government or any other government. These procedures must be understood before delivering our goods or services to governments. The Legal Department can assist you with this.

Nothing in this Code prohibits employees from (i) reporting possible violations of law or regulation to, or communicating with or testifying before, any governmental agency or entity, including but not limited to (A) the U.S. Department of Justice, the U.S. Securities and Exchange Commission, the U.S. Congress, and any U.S. agency Inspector General, and (B) similar competent authorities in any non-U.S. jurisdiction, to the extent that any such authority has specific power under applicable law to receive or request the relevant information, (ii) making other disclosures that are protected under the whistleblower provisions of federal, state or local law or regulation, or (iii) disclosing information about wages or working conditions that is not proprietary Company information. Employees do not need the Company's prior authorization to make any such reports or disclosures and they are not required to notify the Company that they have made such reports or disclosures. Furthermore, nothing in this Code prohibits or limits employees from reporting possible violations to the Company in accordance with the Company's Whistleblower Policy.

13. Obtain and Use Company Assets Wisely

Personal use of Company property must always be in accordance with corporate policy. Proper use of Company property, information resources, material, facilities and equipment is your responsibility. Use and maintain these assets with the utmost care and respect, guarding against waste and abuse and never borrow or remove Company property without management's permission.

14. Follow the Law and Use Common Sense in Political Contributions and Activities

The Company encourages its employees to become involved in civic affairs and to participate in the political process. Employees must understand, however, that their involvement and participation must be on an individual basis, on their own time and at their own expense. Federal,

local and state laws govern political contributions and activities and may restrict certain donations from the Company, whether in the form of funds, goods or services, or employees' work time.

15. Role of Senior Director of Risk and Corporate Compliance/Chief Financial Officer/Audit Committee Chair

The Company has established a Risk and Corporate Compliance Department, led by the Senior Director of Risk and Corporate Compliance, empowered to enforce this Code. The Senior Director of Risk and Corporate Compliance shall review all reported violations or suspected violations of this Code. The Senior Director of Risk and Corporate Compliance will also routinely report to the Chief Financial Officer, the Chair of the Audit Committee and the Chief Legal Officer regarding reported violations or suspected violations of this Code. The Senior Director of Risk and Corporate Compliance is authorized to delegate compliance-related responsibilities including enforcement of this Code and the Whistleblower Policy to other senior employees of the Company as he or she deems necessary or appropriate, including but not limited to the Director of Risk and Corporate Compliance.

The Audit Committee will report to the Paycom Software Board of Directors at least once each year regarding the general effectiveness of this Code, the Company's controls and reporting procedures and the Company's business conduct. The Company's Senior Director of Risk and Corporate Compliance, in consultation with the Chief Legal Officer and/or the Company's Legal Department, and under the authority of the Audit Committee, shall oversee the investigation of reported complaints and allegations concerning violations of this Code, in accordance with the Company's Whistleblower Policy. The Senior Director of Risk and Corporate Compliance and Chief Financial Officer have direct access to the Audit Committee and are required to report to the Audit Committee at least quarterly on compliance activity.

If you are uncertain whether a particular activity or relationship is improper under this Code or requires a waiver of this Code, you should disclose it to the Company's Senior Director of Risk and Corporate Compliance (or the Audit Committee if you are an executive officer or a Paycom Software Board Member), who will determine whether a waiver of this Code is required. If a waiver is required, the Company's Senior Director of Risk and Corporate Compliance and Chief Financial Officer (or the Paycom Software Board of Directors in the case of an executive officer or a Paycom Software Board Member) will determine whether a waiver will be granted and any disclosures that must be made to stockholders. You may be required to agree to conditions before a waiver or a continuing waiver is granted.

16. Disciplinary Measures

The Company shall consistently enforce this Code through appropriate means of discipline. Violations or suspected violations of this Code shall be promptly reported to the Senior Director of Risk and Corporate Compliance in writing or in accordance with the Company's Whistleblower Policy.

The disciplinary measures, which may be invoked at the discretion of the Company (to the extent permitted by applicable law), include, but are not limited to, counseling, oral or written reprimands, warnings, probation or suspension with pay, probation or suspension without pay, demotions,

reductions in salary, termination of employment and restitution. Violations may also result in civil or criminal actions against the violator.

It is the Company's policy not to allow retaliation against any Board Member, officer or employee for reports of misconduct or suspected violation of this Code by another person made in good faith, for providing to a law enforcement officer any truthful information relating to the commission or possible commission of any offense or for providing information on actions such person reasonably believes to be violations of securities laws, rules of the Securities and Exchange Commission or other federal laws relating to fraud against stockholders.

Persons subject to disciplinary measures shall include, in addition to the violator, others involved in the wrongdoing such as (i) persons who fail to use reasonable care to detect a violation, (ii) persons who if requested to divulge information withhold material information regarding a violation and (iii) supervisors who approve or condone the violations or attempt to retaliate against employees or agents for reporting violations or violators.

17. Provisions Applicable to Non-U.S. Company Employees

Compliance with this Code is not intended to contravene jurisdiction-specific laws or regulations that may be applicable to a particular situation. In the event an applicable jurisdiction-specific law or regulation establishes requirements or processes that differ from or conflict with this Code, that applicable local law or regulation should be followed. If you have any questions about the requirements of local laws or regulations, please contact the Company's Chief Legal Officer for assistance. Except as specifically stated in this section, all other provisions and principles of this Code apply to non-U.S. Company employees.

18. Conclusion

No Code can cover every situation that might arise in a company. This Code is designed to let you know our basic guiding principles and provide explanation on how to handle various situations. If you have questions on any situation, whether or not described in this Code, please ask. The first place to turn is your immediate supervisor or manager. If you are uncomfortable discussing a situation with your immediate supervisor or manager, you may go to anyone in management whom you feel comfortable with, including the Company's Chief Financial Officer, Chief Executive Officer or Senior Director of Risk and Corporate Compliance. We cannot stress our final point enough: "When in doubt, ask."

This Code is subject to repeal and amendment at any time by the Paycom Software Board of Directors. This Code should not be construed as a contract of employment and does not change any person's status as an at-will employee. This Code is for the benefit of the Company, and no other person is entitled to enforce this Code. This Code does not, and should not be construed to, create any private cause of action or remedy in any other person for a violation of the Code.

Last Updated: November 2, 2026

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EMPLOYEES

ACKNOWLEDGMENT

By signing below, I acknowledge and certify that I have received, read, and understand Paycom Software, Inc.'s Code of Ethics and Business Conduct for Officers, Directors and Employees (the "***Code***").

I acknowledge that my employment relationship with Paycom Software, Inc. and its subsidiaries (collectively, the "***Company***") is terminable at will, by the Company or me, at any time, for any reason, with or without cause.

I agree (i) to comply with the Code and conduct the business of the Company in keeping with the highest ethical standards and (ii) to comply with international, federal, state and local laws applicable to the Company's businesses. I understand that failure to comply with the Code will lead to disciplinary action by the Company, which may include termination of my employment and/or the reduction of compensation or demotion.

(Please Print)

Name _____

Business Unit/Location _____

Position Title _____

Signature _____

Date _____

Please sign this document in ESS and keep a copy for your own files.