New Relic, Inc. Modern Slavery Act 2015: Slavery and Human Trafficking Statement

The United Kingdom Modern Slavery Act of 2015 requires certain businesses to disclose their efforts to prevent or otherwise eradicate slavery and human trafficking from their supply chains. New Relic, Inc., together with its subsidiaries (collectively, New Relic), is committed to complying with these laws, as well as ensuring that its employees and suppliers across the globe follow all applicable laws and regulations, including the UK modern slavery act.

Organization Structure

New Relic, Inc. is headquartered in San Francisco and New Relic has significant operations in Portland, Oregon, Dublin, Ireland, and Barcelona, Spain, as well as various regional offices in other places throughout the world.

Supply Chains

New Relic hosts its applications and serves all of its customers from data centers located in Chicago, Illinois and, to a lesser extent, a combination of cloud hosting providers. New Relic utilizes third parties to manage portions of its infrastructure, including at the Chicago data centers.

Risks

New Relic's suppliers and partners are predominantly based in the United States and Europe and include the likes of Amazon Inc., Google Inc., Salesforce.com Inc., and Microsoft Corporation, each of which have stated codes of conduct and ethics. However, a component of New Relic's growth strategy involves the further expansion of its operations and customer adoption internationally. Operating in international markets requires significant resources and management attention and subjects New Relic to regulatory, economic, and political risks that are different from those in the United States - e.g., the Modern Slavery Act 2015, which has come to the fore due to New Relic's involvement in the UK. New Relic regularly keeps up to date with changing legislation and keeps its employees informed through appropriate training and updates.

New Relic Policies and Values

New Relic believes that its corporate culture has been a critical component to its success. New Relic has invested substantial time and resources in building its team and ensuring that the type of people it employs or works with have high moral standards and integrity. In its offices worldwide, New Relic's workforce celebrates diverse perspectives and unique identities, respects each other, and makes a real impact every day. New Relic ensures that the highest level of integrity is maintained throughout all areas of its business by promoting its five core values:

1. Authentic – Be genuine, honest, and inclusive.
2. Accountable – Take pride in what one does and hold one's self to high standards. Deliver on commitments.
4. Passionate – Be inspired by, and seek to inspire, customers. Strive to make a difference.

5. Connected – Build trusted, personal connections with each other. Be a team.

New Relic’s employees and contractors are also required to adhere to a Code of Conduct, which can be downloaded here. It reflects the business practices and principles of behavior that supports these values and is reviewed for any necessary updates regularly. Among other things, the Code sets forth guidelines regarding:

- honest ethical conduct;
- legal compliance;
- international business laws;
- conflicts of interest;
- fair dealings; and
- compliance standards and procedures.

In accordance with these guidelines and values, New Relic aims to ensure that it hires and works with people who portray high ethical standards and integrity that would have zero tolerance towards any sort of modern slavery or human trafficking. New Relic strives to act ethically and with integrity in all of its business relationships, which means that New Relic takes great effort to implement and enforce effective systems and controls, including those that would prevent slavery and human trafficking from existing in the supply chains.

**Prevention and Due Diligence Processes**

To ensure all those in New Relic’s supply chains and contractors comply with New Relic’s values, New Relic enters into appropriate partner agreements with all of its suppliers and partners. As part of this, New Relic requires suppliers and partners to comply with all applicable laws, which includes the UK modern slavery act. New Relic also may require certain suppliers and partners to adhere to New Relic’s Code of Conduct, or to certify that they have implemented a code of conduct with the same effect.

However, to manage its growth and increasing risks effectively, New Relic must continue to improve its operational, financial, and management systems and controls by, among other things:

- effectively attracting, training, and integrating a large number of new employees, particularly members of sales and marketing teams and employees and consultants in all jurisdictions;
- enhancing information, training, and communication systems to ensure that employees are well-coordinated, well-informed, and can effectively communicate with each other and customers; and
- when entering into new contracts, undertake due diligence to ensure that the third parties have the relevant policies and procedures in place that would prevent slavery, human trafficking, and forced labor.

New Relic believes that no individual should be subjected to any form of forced labor, slavery, or human trafficking and New Relic will continue to review its processes to take necessary steps within its power to prevent it from existing within its supply chains. New Relic is committed to ensuring that its appropriate vendors within its supply chains and business maintain a strong understanding of this topic, and will continue to require business partners to comply with all applicable laws, which includes the UK modern slavery act.

**New Relic’s Effectiveness in Combatting Slavery and Human Trafficking**

New Relic uses the following key performance indicators (KPIs) to measure how effective it has been in ensuring that slavery and human trafficking is not taking place in any part of its business or supply chains:

- provide adequate training for all staff;
require suppliers and partners to be bound by obligations to comply with all applicable laws; and
regularly evaluate processes to determine whether it would be appropriate to adopt further policies or procedures, or join related third party organizations, each in light of the goal of preventing slavery and human trafficking in any part of New Relic’s business or supply chains.

New Relic has reviewed its performance during fiscal 2018 against the established KPIs. During fiscal 2018, New Relic has:

- continued to make this policy available to the public as well as the employees and contractors working for New Relic;
- undertaken continued training efforts related to this policy for staff involved in the company’s procurement function, including with respect to audits of vendors and appropriate terms for inclusion in negotiated agreements;
- continued to increase efforts to include in all vendor agreements provisions that require suppliers and partners to comply with all applicable laws, including those that would prevent slavery and human trafficking from existing in the supply chains; and
- continued to evaluate and implement mechanisms, software and training programs to improve employee knowledge regarding compliance with applicable policies.

To ensure that New Relic is successful in continuing to implement the foregoing efforts, New Relic’s Chief Compliance Officer oversees these program responsibilities, which include:

- investigating possible violations;
- training new employees;
- conducting regular training sessions to refresh employees’ familiarity;
- obtaining annual confirmations from employees as to compliance with applicable policies;
- updating policies as needed and alerting employees to any updates; and
- otherwise promoting an atmosphere of responsible and ethical conduct.

Any employee, contractor, or third party can contact New Relic’s Chief Compliance Officer by emailing compliance@newrelic.com. In addition, to ensure that this is maintained throughout the company, New Relic’s Board of Directors must exercise its judgment in the best interest of New Relic and its stockholders, while continually reviewing and assessing the adequacy of its policies, controls, and guidelines. New Relic’s Board has set up a Nominating and Corporate Governance Committee, which in part oversees all aspects of the company’s corporate governance functions and reports any findings back to the full Board.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes New Relic’s slavery and human trafficking statement for the financial year ending 31 March 2019.

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Angel Zhao
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