

Vendor Code of Conduct

Last updated December January 6, 2022

Introduction

At New Relic, we are committed to doing business in a way that is **BOLD, PASSIONATE, ACCOUNTABLE, AUTHENTIC, and CONNECTED**. We expect our vendors to help us maintain these core values. This Vendor Code of Conduct explains our expectations for our vendor community and outlines our minimum standards.

This Vendor Code is intended to supplement—not replace—any code of conduct you may have adopted and any other obligations you have to New Relic. This Code applies to all businesses and individuals that provide products and services to New Relic, as well as their affiliates, agents, and subcontractors (collectively, “**Vendors**” or “**you**”). New Relic will consider your commitment to compliance with this Code when making procurement and sourcing decisions.

As no single document can cover every situation that may arise in the course of our business relationship, we ask that you exercise good judgment and notify us promptly if you have any concerns. We expect you to know and follow all local, state, federal, and international laws that apply wherever you do business.

Using and Protecting New Relic Property and Information

You are expected to follow industry-standard best practices to protect New Relic’s property and information, as well as the property and information of our customers. You may only use technologies, information, and facilities belonging to New Relic (or New Relic’s customers) for authorized purposes in accordance with our [Acceptable Use Policy](#).

New Relic expects all Vendors to respect personal information, including the personal information of New Relic’s employees. This means not sharing or using personal information without a data subject’s consent or some other legitimate purpose. **If you learn of a data security breach involving information belonging to New Relic, its employees, or New Relic’s customers, you must notify us promptly.**

New Relic expects its Vendors to respect intellectual property rights. For example, you may not obtain, distribute, or use unlicensed copyrighted software or information without proper authorization. This prohibition includes the use of unlicensed software on New Relic-issued equipment. New Relic will take all appropriate measures to address any use by our Vendors of unlicensed software on New Relic-issued hardware.

Any use of New Relic’s name, logo, or other trademarks must be approved in writing by New Relic and follow our [Media Assets guidelines](#).

Following Antitrust, Competition, and Anti-Corruption Laws

Following our core value of **ACCOUNTABLE**, New Relic is committed to fair competition. Among other things, this means following the antitrust and competition laws of the countries where we operate. We expect the same from our Vendors. Vendors may not enter into any agreement that violates the letter or spirit of any anti-competition law.

Likewise, we expect all marketing and sales activities done on New Relic's behalf to be legal and ethical. Offering or giving bribes, kickbacks, facilitation payments, or bartering arrangements to obtain business from (or on behalf of) New Relic is strictly prohibited. All Vendors must follow anti-corruption laws, including the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and the Organisation for Economic Cooperation and Development Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. Vendors must not tolerate or engage in any form of corruption, extortion, or bribery, regardless of whether they are working with government officials or private-sector individuals.

Avoiding Conflicts of Interest

We expect you to avoid any conflicts of interest that may cast doubt on your ability to conduct business with New Relic in an **ACCOUNTABLE** and **AUTHENTIC** way. As a Vendor, you are expected to report to us any situations that may appear to create conflicts of interest. This includes reporting any New Relic employee that has an interest of any kind in your business.

If you think you may have a potential conflict of interest, please refer to the "Raising Questions and Concerns" section below for a list of New Relic contacts who can help you resolve this situation.

Prohibition on Insider Trading

As a Vendor, you may encounter material, non-public information about New Relic or other companies as part of our business relationship. (Information is considered "material" if a reasonable investor would consider it important in deciding whether to buy, sell, or hold a company's securities.) Neither you nor your affiliates, employees, agents, or subcontractors may buy or sell securities while in possession of material, non-public information, nor may you provide such information to others who could trade on it (i.e., no "tipping"). **Trading on material, non-public information is a federal crime, punishable by civil and criminal penalties.**

If you have any concerns regarding inside information or inadvertent disclosure of inside information, contact our General Counsel at legal@newrelic.com so that we can investigate this situation and resolve it appropriately.

Giving Gifts and Entertainment

While it may be appropriate to exchange business courtesies in certain situations, it is never appropriate to give or receive gifts or entertainment that are extravagant or that are given with the intent of improperly influencing a business decision. **Vendors should not offer gifts or entertainment to New Relic employees valued at over \$150 per year**, nor offer gifts or entertainment of any value to New Relic employees during a Request for Proposal (RFP) or other vendor-selection process.

Ensuring Product Quality and Safety

All products and services you provide to New Relic (and New Relic's customers) must meet applicable regulatory quality and safety standards, along with any standards, policies, or contractual requirements established by New Relic. Vendors must procure all goods and services for New Relic in a responsible and legal manner. Before engaging with any third parties on behalf of New Relic or New Relic's customers, you must ensure that these third parties adhere to similar quality and safety standards.

Maintaining Financial Integrity

As a publicly traded company, New Relic relies on the integrity of our financial records to report our financial results, provide required disclosures, and make business decisions. To support us in these efforts, you must keep accurate business records of all your transactions with New Relic, in accordance with applicable standard accounting practices.

If you know of any actual or potential accounting irregularities related to your business dealings with New Relic, please refer to the "Raising Questions and Concerns" section below for a list of New Relic contacts.

Handling Imports and Exports

You must comply with all applicable international trade laws and regulations, including those related to export compliance administered by the U.S. Commerce Bureau of Industry and Security, U.S. Treasury Office of Foreign Asset Control, or other governmental entities imposing export controls and trade sanctions. Remember that import and export laws apply not only to goods but also to technology, software, intellectual property, and technical information.

Promoting Diversity, Equity, and Inclusion

New Relic is committed to diversity and treating all persons fairly and with dignity and respect. We expect our Vendors to identify, adopt, and integrate diversity, equity, and inclusion considerations into their procurement and hiring processes, including by giving equal treatment to minority- and

women-owned businesses. We require that our Vendors comply with all applicable employment and safety laws and that they foster a diverse and inclusive workplace.

We expect our Vendors (and their agents and subcontractors) to respect employees' rights and to follow all local laws regarding working hours and conditions, freedom of association, collective bargaining, and the payment of fair and equitable compensation.

Protecting Human and Employee Rights

CONNECTED is one of New Relic's core values, and New Relic supports the elimination of modern slavery and human trafficking. We will not tolerate any human rights abuses or offenses by our Vendors or their affiliates, employees, agents, or subcontractors. All Vendors must, at minimum, follow applicable laws and regulations (including the UK Modern Slavery Act of 2015) concerning human trafficking, child labor, forced or compulsory labor, and involuntary prison labor. Further, all Vendors must regularly review their employments practices and perform due diligence to ensure against modern slavery and human trafficking in their supply chains.

Neither you nor your customers may allow, promote, or facilitate any hate-related or violent speech, whether in the workplace or through electronic communications. Further, you and your customers must not allow harassment of any kind in your workplace or tolerate behaviors—including gestures, language, and physical contact—that are coercive, threatening, or abusive in nature.

Protecting the Natural Environment

As part of New Relic's commitment to being a **CONNECTED** workplace, New Relic strives to engage in business practices that protect and respect our natural environment. At a minimum, we expect our Vendors to follow all applicable environmental laws and standards, including those related to chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits, and environmental reporting. We encourage our Vendors to take proactive steps to improve and protect the environment in the communities they serve.

Government Contracting Standards

New Relic is an authorized U.S. government contractor under the Federal Risk and Authorization Management Program ("FedRAMP"), and may provide services to local, state, and federal government agencies. Under FedRAMP, we are obligated to meet high standards for information management and security, and we expect you to adopt similarly rigorous standards.

HIPAA Compliance (For Vendors Processing Healthcare Information)

In some cases, U.S. federal and state laws require New Relic and our Vendors to maintain the privacy and security of protected health information, such as health care records and other individually identifiable

patient information (“PHI”). Vendors that will access or use PHI (from New Relic, its employees, or New Relic’s customers) must sign a Business Associate Agreement with us. Such Vendors must ensure that their personnel and subcontractors who provide services to New Relic comply with the requirements of both the Health Insurance Portability and Accountability Act (“HIPAA”) Privacy and Security Rules and, where applicable, those state laws that provide more stringent protection of PHI. In addition, Vendors that will access or use PHI must implement and maintain reasonable security precautions, as further described in New Relic’s security policies, and ensure that all personnel and subcontractors receive role-appropriate periodic (at least annually) training and assessments on cybersecurity.

Raising Questions and Concerns

For questions about New Relic’s vendor selection and onboarding processes, please contact our Vendor Management Office at vmo@newrelic.com.

We rely on our suppliers to help us uphold our core values and to conduct business legally and ethically. If you believe that anyone—including employees and agents of New Relic—is not upholding the standards set by this code, we expect you to report your concerns to our General Counsel at legal@newrelic.com. You may also deliver a complaint anonymously via regular mail addressed to the General Counsel at New Relic Inc., 188 Spear Street, Suite 1000, San Francisco, California, 94105, USA. New Relic will promptly investigate all matters submitted and respond appropriately. As a New Relic Vendor, your prompt cooperation with any related investigation is expected.

We will make every effort to safeguard the confidentiality (and, if applicable, the anonymity) of any persons reporting potential misconduct. We expect that our Vendors will not retaliate against anyone who makes a good faith report of a violation of our Vendor Code of Conduct, policies, or the law, either internally or to New Relic. Acting in good faith means that the report is made sincerely and honestly; it does not matter whether the report proves true or not.