



Modern Slavery and Human Trafficking Policy

Table of Contents

1. Introduction	3
2. Scope	3
3. Roles and Responsibilities	3
4. Policy	4
5. Revision of Policy	5
6. Questions and Clarifications	5
7. Document details	6
8. Version control	6

1. Introduction

This policy details the stance Neo4j has against modern slavery and human trafficking.

1.1 Definitions

For the purposes of this policy the words “shall”, and “must” are both used to denote something that is a requirement. “Should” and “recommended” are used to convey something that is not required but strongly advised. “Shall not” and “must not” are similarly used to denote something that is not to be done, and is thus prohibited.

2. Scope

The scope of this policy applies to Neo4j UK Limited and the Neo4j Group, globally.

3. Roles and Responsibilities

Senior Leadership

Ensures sufficient resources and personnel are available for Neo4j to implement this policy

Legal Department

Define Policy

Departments and line management

Implement policy

4. Policy

Modern Slavery Act 2015: Modern Slavery and Human Trafficking Statement

This statement is made by Neo4j UK Limited ("we") under section 54(1) of the Modern Slavery Act 2015 (the "Act") and was approved and signed on behalf of the Board of Neo4j UK Limited on 7 November 2019. This constitutes our Modern Slavery and Human Trafficking Statement for the financial year ended 31 December 2023.

Organisation and structure

Neo4j UK Limited is a private limited company registered in England and Wales with registered number 10922328. Neo4j is an international corporation comprising Neo4j, Inc. and its affiliates operating in the jurisdictions as detailed on our website at <https://neo4j.com/contact-us/>.

We are committed to legal compliance and ethical business practices in all of our operations worldwide, this includes improving our practices to combat slavery and human trafficking. We choose suppliers and contractors who we believe share that commitment.

Risk Assessment

As the leader in graph database software, we consider that we are at low risk of modern slavery occurring within our own business. However we remain alert to the possibility, and contractual requirements with our suppliers and vendors cover our approach to this.

Our key suppliers are those required to support our global professional service business, which is office based. The key areas of spend with suppliers are consulting services. Global spend on suppliers is concentrated in the United States, with other spend distributed across other international offices. Our aim is to foster long term relationships with our critical business suppliers, as this is key to establishing an open relationship where price is not the only driver.

Actions to help prevent forced labour, modern slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We commit to use only legal and ethical business practices and to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. All suppliers are subject to legal terms and conditions with Neo4j and they are contractually obligated to abide by all applicable law.

Next steps

We will review the steps taken so far to identify any gaps and consider the effectiveness of our approach.

We will continue with supplier screening and a risk based approach to such suppliers following the due diligence process described above.

We will seek to expand and embed knowledge of the issues and risks around modern slavery and human trafficking to all appropriate staff across the network of offices via regular communication and targeted training.

We will include modern slavery in our ongoing operational risk review process which is conducted across our network of offices.

5. Revision of Policy

This policy, as most governance documents, will change over time. The latest released and approved version of this policy applies.

The policy shall be reviewed annually, or when necessary to reflect changes in laws, regulations, best practices, or organizational needs.

6. Questions and Clarifications

Please direct any questions regarding this policy to policygovernance@neo4j.com.

7. Document details

Version	1.3	Issue date	
Document ID	LEG-0005	Author	Merton Thompson
Approved by			

8. Version control

Version	Summary of Changes	Date	Author	Approved By
1.3	Annual Review and new template	2024-04-25	Merton Thompson	Marc Roualet
1.2	Updated to remove signature at the end	2023-02-32	Merton Thompson	Marc Roualet
1.1	updated for 2023 using new template	2022-12-29	Merton Thompson	Marc Roualet
1.0	initial version	2019-11-07	Merton Thompson	