

# SLAVERY AND HUMAN TRAFFICKING STATEMENT

NVIDIA's singular vision is to build one of the most influential and admired technology companies in the world. Integral to this vision are NVIDIA's corporate responsibility commitments, including respecting and championing the human rights of our employees, and ensuring all workers in our supply chain are treated with respect and dignity. This statement describes the actions taken by NVIDIA Corporation and its subsidiaries during the fiscal year ended January 29, 2017, or Fiscal 2017, to prevent modern slavery and human trafficking in our business and supply chain.

### NVIDIA STRUCTURE, BUSINESS AND OPERATIONS

NVIDIA Corporation, a Delaware corporation, was founded in 1993 with a focus on PC graphics, and invented the GPU to solve some of the most complex problems in computer science. In recent years, we have extended our emphasis to the revolutionary field of artificial intelligence. We specialize in markets in which GPU-based visual computing and accelerated computing platforms can provide enhanced throughput for applications: gaming, professional visualization, datacenter, and automotive. NVIDIA is headquartered in Silicon Valley, California, in the United States, employs more than 10,000 people, and has more than 40 offices around the world, including in the United Kingdom.

We do not directly manufacture the semiconductor wafers or printed circuit boards used in our products, nor do we manufacture the company's branded devices. Instead, we utilize what is known as a fabless manufacturing strategy for all of our semiconductor product-line operating segments, whereby we employ world-class suppliers for all phases of the manufacturing process, including wafer fabrication, assembly, testing and packaging. Our suppliers are also responsible for procurement of the majority of the raw materials used in the production of our products. We also contract with manufacturers to build, test, and distribute our company-branded devices.

### POLICIES RELATED TO SLAVERY AND HUMAN TRAFFICKING

NVIDIA's Code of Conduct and corporate policies define our corporate governance, promote the interests of our stockholders, and establish common expectations within our company. During Fiscal Year 2017, we undertook a complete overhaul of our Code to strengthen, among other areas, provisions regarding human rights and child labor, as well as supplier expectations. The updated Code was launched in 2017, and in it, we specify that we honor human rights, which includes:

- Respecting internationally recognized human rights where we operate;
- Not engaging in child labor; forced, bonded, or indentured labor; involuntary prison labor; slavery; trafficking of persons; or physical punishment;
- Supporting the rights of employees in our suppliers' operations; and
- Requiring our suppliers to comply with the Code of Conduct of the Responsible Business Alliance (RBA), formerly
  known as the EICC (Electronic Industry Citizenship Coalition), and to align with other internationally recognized
  standards related to social and environmental responsibility

In January 2016, we adopted a Combatting Trafficking in Persons Policy, which defines prohibited acts of trafficking or related activities by NVIDIA employees, agents, subcontractors (including our suppliers), subcontractor employees, or their agents. We require that our employees report any activity inconsistent with this Policy to our Compliance Committee. Employees, subcontractors, or agents of NVIDIA who violate this Policy or related legal requirements will be subject to disciplinary action, including termination of employment or other relationship with NVIDIA.

We drive several of our supply chain initiatives through participation in the RBA, of which we have been a member since 2007. We have adopted the RBA Code of Conduct and integrated its elements into our program. The suppliers and contract manufacturers who manufacture and assemble our products are required to acknowledge and implement the RBA Code



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of Conduct, which includes a prohibition on forced, bonded, or indentured labor and human trafficking, to ensure that we address all aspects of responsible supply chain management.

#### RISKS, DUE DILIGENCE PROCESSES AND EFFECTIVENESS

Due to the nature of our business model as a fabless semiconductor manufacturer, the risk of modern slavery and human trafficking within our own business operations is relatively low. Our exposure to citations for general labor and ethics violations is extremely low to nonexistent, and we have a robust system for soliciting and rectifying confidential notifications on suspected labor or ethics issues.

Therefore, we view our supply chain as presenting the greater risk from slavery and trafficking. To that end, we have engaged with suppliers through quarterly business reviews and implemented a performance-based award system for suppliers that allocates points in their performance score for their efforts to participate in social and environmental initiatives. We measure compliance against RBA member requirements and RBA Code of Conduct for our suppliers, and have conducted audits on our product lines since 2012.

Our two semiconductor wafer manufacturers are members of the RBA. In Fiscal 2017, we implemented a process for new suppliers which includes screening them for environmental and social criteria, and 100% of new suppliers were screened. We reviewed validated audit processes (VAP) of strategic suppliers, and engaged suppliers on their corrective action plans (CAP). One of the common findings included working hours. We continue to monitor to ensure that suppliers demonstrate effective processes to ensure conformance, and report our progress through our Sustainability Report, which tracks NVIDIA's performance against RBA membership requirements.

Additionally, as part of our conflict minerals program, NVIDIA is a member of the Public Private Alliance for Responsible Minerals Trade (PPA) and the Responsible Minerals Initiative (RMI), formerly known as the Conflict-Free Sourcing Initiative. NVIDIA supports these on-the-ground programs aimed at reducing human rights risks, including forced labor. The PPA provides funding and coordination support to organizations working within the Democratic Republic of Congo and adjacent countries to develop verifiable conflict-free supply chains; align due diligence programs and practices; encourage responsible sourcing from the region; promote transparency; and bolster in-region civil society and governmental capacity. The RMI provides companies with tools and resources to make sourcing decisions that improve regulatory compliance and support responsible sourcing from conflict-affected and high-risk areas. The Responsible Minerals Assurance Process of the RMI, formerly known as the Conflict-Free Smelter Program, offers companies and their suppliers an independent, third-party audit that determines which smelters and refiners can be validated as "responsibly sourced," in line with current global standards.

#### **TRAINING**

All NVIDIA employees are required to complete training, both upon hire and periodically during employment, on the NVIDIA Code of Conduct. Relevant employees took several RBA Learning Academy courses. NVIDIA also participated in a forced and bonded labor workshop to help determine industry actions for our new Code requirements. We worked with suppliers to track working hours through VAP, CAPs, or RBA working-hours templates. Additionally, we assigned RBA Learning Academy courses to suppliers, including those on:

- Forced Labor 1: Recognizing Forced Labor
- Forced Labor 2: Preventing Forced Labor
- Hiring and Working with Migrant Workers
- Working Hours
- Recording Working Hours



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- Working Hours Management System
- The Hiring Process
- Managing Wages
- Creating Motivating Wage Systems

#### **SUMMARY**

NVIDIA is committed to the highest standards of ethics and corporate social responsibility to prohibit slavery and trafficking in persons or related activities, and encourages our employees, suppliers and business partners to join our commitment to promoting human rights.

This statement has been approved by the undersigned member of the Board of Directors for and on behalf of each of NVIDIA Limited, NVIDIA Development UK Limited, and NVIDIA Technology UK Limited, the subsidiaries of NVIDIA Corporation which have been organized under the laws of England and Wales.

Rebecca Peters, Director

December 4, 2017
Date