

Company Name NVIDIA Corporation
Industry ICT (Supply Chain only)
Overall Score (*) 10.0 out of 100

Theme Score	Out of	For Theme
1.4	10	A. Governance and Policies
0.5	25	B. Embedding Respect and Human Rights Due Diligence
0.8	15	C. Remedies and Grievance Mechanisms
2.0	20	D. Performance: Company Human Rights Practices
2.0	20	E. Performance: Responses to Serious Allegations
3.3	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: General HRs commitment: The Company states that it complies with all applicable laws; respects internationally recognized human rights where it operates; and supports the rights of employees in its suppliers' operations. [Code of Conduct: nvidia.com] Not met: UNGC principles 1 & 2 Not met: UDHR Not met: International Bill of Rights Score 2 <ul style="list-style-type: none"> Not met: UNGPs Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: ILO Core: The Company states that it does not engage in child labour, forced, bonded or indentured labour and respects the right of all workers to form and join trade unions, to bargain collectively, and to engage in peaceful assembly as defined by local laws'. The Company also treats each individual fairly and does not tolerate discrimination or harassment against anyone. However, It is not clear whether it is committed to respect these rights in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'as defined by local laws'. [Code of Conduct: nvidia.com] <ul style="list-style-type: none"> Not met: UNGC principles 3-6

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			<ul style="list-style-type: none"> • Not met: Explicitly list ALL four ILO for ICT suppliers: The Company indicates that it require all suppliers to comply with the RBA Code of Conduct and use the Code as a platform to go above and beyond compliance. The RBA Code of Conduct includes provisions in relation to forced labour, child labour and discrimination. In relation to freedom of association and collective bargaining, it states the following: 'In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities.' However, it is not clear whether the Company is respecting those rights in all contexts, as it indicates 'in conformance with local law'. [CSR Report 2019, 2019: nvidia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: As indicated above, the Company's Code of Conduct indicates: 'We comply with all applicable laws; respect internationally recognized human rights where we operate; and support the rights of employees in our suppliers' operations. We don't engage in child labor, forced, bonded or indentured labor, involuntary prison labor, slavery, trafficking of persons, or physical punishment. [...] We respect the right of all workers to form and join trade unions, to bargain collectively, and to engage in peaceful assembly as defined by local laws. We also respect the right of workers to refrain from such activities.' However, It is not clear whether it is committed to respect these rights in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'as defined by local laws'. [Code of Conduct: nvidia.com & Corporate Responsibility Directive, 07/2011: nvidia.com] • Met: Respect H&S of workers: The Company states that it is committed to providing a safe and healthy environment for its employees. It offers programs throughout the year to assist with employee's personal wellness. It also has Environmental Health and Safety team to oversee workplace conditions. [Environmental Health Safety Energy Policy, 26/02/2018: nvidia.com & CSR Report 2018, 2018: nvidia.com] • Not met: H&S applies to ICT suppliers: The Company states that it is committed to working with suppliers to ensure their adoption of the Responsible Business Alliance Code of Conduct and promote high standards of Environmental, Health, Safety and Energy Policy (EHS&E) performance throughout product supply chain. However, there is no more details on health and safety commitment requirements. [Environmental Health Safety Energy Policy, 26/02/2018: nvidia.com] • Not met: working hours for workers • Not met: Working hours for ICT suppliers
A.1.3.ICT.a	Commitment to responsible sourcing of minerals	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Responsible mineral sourcing in conflict areas: The Company states that it implements sourcing and chain of custody due diligence practices designed to reasonably assure that minerals from the Democratic Republic of Congo and adjoining countries (DRC), including gold, tantalum, tungsten and tin (3TG), used in its products do not directly or indirectly finance or benefit armed groups in the DRC. However, it is not clear if there's a responsible sourcing commitment (responsible sourcing or committing to not financing/benefiting armed groups and respect human rights) extended to high risk areas beyond DRC and adjoining countries. [Conflict Minerals Policy, 19/01/2016: nvidia.com] • Met: Based on OECD Guidance: 'Our conflict minerals due diligence program is designed to conform in all material respects with the framework recommended by the Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, or the OECD Guidance, as it relates to our supply chain position as a "downstream" purchaser.' [Conflict Minerals Report 2018, 31/5/2018: webcache.googleusercontent.com] • Not met: Requires responsible mineral sourcing from suppliers: The Company states that it expects its suppliers to acquire materials from conflict-free sources within the DRC and to provide their supply chain conflict minerals information to us using the CFSI conflict minerals reporting template. However, no evidence found to responsible sourcing (not benefiting/financing armed groups) of suppliers being required to sourcing responsible from all conflict affected and high-risk areas based on the OECD Guidance. [Conflict Minerals Policy, 19/01/2016: nvidia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responsible conflict mineral sourcing covers all minerals: The Company states that it implements sourcing and chain of custody due diligence practices designed to reasonably assure that minerals from the Democratic Republic of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Congo and adjoining countries (DRC), including gold, tantalum, tungsten and tin (3TG), used in its products do not directly or indirectly finance or benefit armed groups in the DRC. However, no evidence found that the Company has included all minerals in its Conflict Minerals Policy. [Conflict Minerals Policy, 19/01/2016: nvidia.com] <ul style="list-style-type: none"> • Not met: Suppliers expected to make similar requirements of their suppliers: No expectation found.
A.1.3.ICT.b	Commitment to respect human rights particularly relevant to the industry (ICT)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Women's Rights • Not met: Children's Rights • Not met: Migrant worker's rights: The company requires its suppliers to conform to the RBA Code of Conduct which contains a commitment to migrant workers rights. However there is no evidence of this commitment in the company's own Code of Conduct. • Met: Expecting suppliers to respect these rights: The company indicates that it requires its suppliers to comply with the RBA Code of Conduct, the RBA code contains the following commitment to migrant workers rights "Participants are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including...migrant...and any other type of worker." [CSR Report 2019, 2019: nvidia.com] Score 2 <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business principles • Not met: Convention on migrant workers • Not met: Expecting suppliers to respect these rights
A.1.4	Commitment to engage with stakeholders	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Regular stakeholder engagement: The Company states that it engages with its diverse stakeholders in numerous ways, including tracking their requests so that it can identify and respond to their key concerns. For example, it conducts a global employee survey approximately every 18 months. The Company reports that the most recent employee survey was conducted in November 2018 and yielded a 95 percent response rate. [CSR Report 2018, 2018: nvidia.com] Score 2 <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits to remedy: The Company states that the Compliance Committee and its delegates investigate reports of suspected violations of its Code promptly, thoroughly, and in accordance with its legal obligations. The Company may determine that remedial action (such as training, enhanced controls, coaching, or communication) or disciplinary action (including termination of employment) is necessary. However, no further commitment found to remedy any adverse impacts that it has caused or contributed to, beyond those reported through grievance mechanisms. Additionally the company provides information about the types of grievance mechanisms available in its 2019 CSR report, however these don't constitute a commitment to remedy. [Code of Conduct: nvidia.com & CSR Report 2019, 2019: nvidia.com] Score 2 <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with ICT suppliers to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) Score 2 <ul style="list-style-type: none"> • Not met: Expects ICT suppliers to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: CEO or Board approves policy • Not met: Board level responsibility for HRs

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Board/Committee review of salient HRs • Not met: Examples or trends re HR discussion Score 2 • Not met: Both examples and process
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Incentives for at least one board member • Not met: At least one key ICT HR risk, beyond employee H&S Score 2 • Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to ILO core conventions: See indicator A.1.2 • Met: Senior responsibility for HR: The Company states that Combatting Trafficking in Persons Policy outlines its Combatting Trafficking in Persons Compliance Program (the Program). The Company's Senior Manager of HR operations leads the Program and is chiefly responsible for its design and implementation. The Policy including prohibiting forced labour. [Combatting Trafficking in Persons Policy, 05/01/2016: nvidia.com] Score 2 • Not met: Day-to-day responsibility • Not met: Day-to-day responsibility for ICT in supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Senior manager incentives for human rights • Not met: At least one key ICT HR risk, beyond employee H&S Score 2 • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: HR risks is integrated as part of enterprise risk system Score 2 • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to ILO core conventions: see A.1.2 • Not met: Communicates its policy to all workers in own operations: The company has a commitment to the RBA CoC which says, "Participants shall adopt or establish a management system whose scope is related to the content of this Code...The management system should contain the following elements: A process for communicating clear and accurate information about Participant's policies, practices, expectations and performance to workers, suppliers and customers". However this indicator requires the company to describe how it communicates its policy commitments. Score 2 • Not met: Commits to all 4 ILO core conventions • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to all 4 ILO core conventions for suppliers • Not met: Communicating policy down the whole ICT supply chain: The company has a commitment to the RBA CoC which says, "Participants shall adopt or establish a management system whose scope is related to the content of this Code...The management system should contain the following elements: A process for communicating clear and accurate information about Participant's policies, practices, expectations and performance to workers, suppliers and customers".

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>However this indicator requires the company to describe how it communicates its policy commitments.</p> <ul style="list-style-type: none"> • Not met: Requiring ICT suppliers to communicate policy down the chain <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How HR commitments made binding/contractual • Not met: Including on ICT suppliers
B.1.5	Training on Human Rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Scores at least 1 on A.1.2 • Met: Trains all workers on HR policy commitments: The Company states that it completes training on its Code of Conduct, which includes human rights policies, upon hire and then every two years. [Code of Conduct: nvidia.com] • Not met: Trains relevant ICT managers including procurement <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Scores at least 1 on A.1.2 • Not met: Monitoring implementation of HR policy commitments • Not met: Monitoring ICT suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Describes corrective action process: The company says, "We engaged six suppliers on their CAPs from the FY18-19 auditing season. Common findings include working hours, social insurance, and fire protection." However this is not a description of the corrective action process. [CSR Report 2019, 2019: nvidia.com] • Not met: Example of corrective action • Not met: Discloses % of ICT supply chain monitored: The company says, "In FY19, we reviewed VAP audits of 50% of strategic suppliers. The total percentage of strategic suppliers audited in the last two years is 60%...Strategic suppliers include those who produce or handle NVIDIA production material, non-critical suppliers for whom we closely manage quality requirements, suppliers who design our branded products, and those we are required to work with based on customer agreements". However it is not clear what % of NVIDIA's supply chain the 'strategic suppliers' account for. [CSR Report 2019, 2019: nvidia.com]
B.1.7	Engaging business relationships	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: HR affects ICT selection of suppliers: Regarding social issues, including forced labour, child labour and FoA & CB, the company says "In 2016 we implemented a process for new suppliers, which includes screening them for environmental and social criteria. 100% of new suppliers were screened in FY19." However there is no further detail about how this information is used when deciding on potential business relationships. [CSR Report 2019, 2019: nvidia.com] • Not met: HR affects on-going ICT supplier relationships: Regarding social issues, including forced labour, child labour and FoA & CB, the company says "We ask our suppliers to submit RBA Self Assessment Questionnaires on an annual basis, in which they self-report information on child labor, [forced or bonded labor], [freedom of association and collective bargaining]. We validate this with critical tier 1 suppliers through the RBA Validated Audit Process protocol." However there is no further detail about how this information is used when making decisions to renew or terminate business relationships. [CSR Report 2019, 2019: nvidia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Working with ICT suppliers to improve performance: In its 2019 CSR Report the company says, "We worked with suppliers to address and comply with zero hiring fees and freely chosen employment. We assigned Learning Academy courses to eight suppliers, including: Hours of Work; Working Hours Recording System; Working Hours Management System; The Hiring Process; Recruitment and Selection; Hiring and Working with Migrant Workers; Wages and Benefits; Creating Motivating Wage Systems; Improving Your Dormitories...Effective H&S Systems, Fire Safety, Managing Air Emissions." However there is no further detail about what these programs entail. [CSR Report 2019, 2019: nvidia.com]
B.1.8	Approach to engagement with potentially	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Stakeholder process or systems • Not met: Frequency and triggers for engagement • Not met: Workers in ICT SC engaged

Indicator Code	Indicator name	Score (out of 2)	Explanation
	affected stakeholders		<ul style="list-style-type: none"> • Not met: Communities in the ICT SC engaged Score 2 <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Identifying risks in own operations: Although the company is a member of the RBA and refers to use of the VAP manual, this indicator requires the company to describe the process of how it identified its human rights risks and impacts in specific locations or activities. [CSR Report 2019, 2019: nvidia.com] • Not met: Identifying risks in ICT suppliers: Although the company is a member of the RBA and refers to use of the VAP manual, this indicator requires the company to describe the process of how it identified its human rights risks and impacts in specific locations or activities. [CSR Report 2019, 2019: nvidia.com] Score 2 <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context): In its CSR Report the Company says "We evaluated all contract manufacturers and direct material suppliers on geographic location, manufacturing processes, past SER performance and public reports. We tracked supplier working hours through VAP, CAPs, or RBA working-hours templates. We worked with suppliers to address and comply with zero hiring fees and freely chosen employment. We assigned Learning Academy courses to eight suppliers, including: Hours of Work; Working Hours Recording System; Working Hours Management System; The Hiring Process; Recruitment and Selection; Hiring and Working with Migrant Workers; Wages and Benefits; Creating Motivating Wage Systems; Improving Your Dormitories." However this is not a description of the process the company has for assessing human rights risks and the company doesn't provide any information about how relevant factors such as geographic, economic and social are taken into account. [CSR Report 2019, 2019: nvidia.com] • Not met: Public disclosure of salient risks: The company doesn't disclose the results of its assessments for human rights areas contained under the 'Labor' RBA code element in its CSR Report. [CSR Report 2019, 2019: nvidia.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks: In its 2019 CSR Report the company says "We engaged six suppliers on their CAPs [Corrective Action Plans] from the FY18-19 auditing season. Common findings include working hours, social insurance, and fire protection. We'll continue monitoring to ensure that suppliers demonstrate effective processes to close these findings and ensure compliance". However this is not a description of the company's global system to manage salient human rights issues. [CSR Report 2019, 2019: nvidia.com] • Not met: Including in ICT supply chain: In reference to actions taken for the human rights elements of the RBA Code covered under 'Labor', the company says "We assigned Learning Academy courses to eight suppliers, including: Hours of Work; Working Hours Recording System; Working Hours Management System; The Hiring Process; Recruitment and Selection; Hiring and Working with Migrant Workers; Wages and Benefits; Creating Motivating Wage Systems; Improving Your Dormitories". However this is not a sufficient example of a conclusion in relation to a specific salient human rights risk. [CSR Report 2019, 2019: nvidia.com] • Not met: Example of Actions decided: The company says it requires all suppliers to comply with the RBA Code of Conduct. Additionally it says "We...have adopted the RBA Code and integrated its elements into our program, including auditing critical suppliers and conducting internal assessments to confirm that we are addressing all aspects of responsible supply chain management. Our employees are engaged in RBA workgroups relevant to our supply chain operations. We also comply with the RBA's guidance regarding stakeholder grievances related to our social or environmental performance". However, this indicator looks for evidence

Indicator Code	Indicator name	Score (out of 2)	Explanation
			of work carried out to mitigate specific salient risks or impacts. [CSR Report 2019, 2019: nvidia.com] Score 2 • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: System to check if Actions are effective: The company identifies the different areas of Supply Chain Performance such as Labour and Health & Safety and gives a brief explanation of whether they are tracked or evaluated, however there is no description of the system which is used to track the actions taken and whether they have produced the desired results. [CSR Report 2019, 2019: nvidia.com] • Not met: Lessons learnt from checking effectiveness [CSR Report 2019, 2019: nvidia.com] Score 2 • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Comms plan re identifying risks [CSR Report 2019, 2019: nvidia.com] • Not met: Comms plan re assessing risks [CSR Report 2019, 2019: nvidia.com] • Not met: Comms plan re action plans for risks [CSR Report 2019, 2019: nvidia.com] • Not met: Comms plan re reviewing action plans [CSR Report 2019, 2019: nvidia.com] • Not met: Including ICT suppliers [CSR Report 2019, 2019: nvidia.com] Score 2 • Not met: Responding to affected stakeholders concerns [CSR Report 2019, 2019: nvidia.com] • Not met: Ensuring affected stakeholders can access communications [CSR Report 2019, 2019: nvidia.com]

C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Channel accessible to all workers: The Company states that its employees must report suspected violations of its Code to a manager, human resources or legal representative, or NVIDIA Compliance, and they must respond and promptly elevate it by emailing NVIDIA Compliance. An anonymous report can be reported through the Speak Up Lines. Its employees can also report such activity via the Global Human Trafficking Hotline. [Code of Conduct: nvidia.com & Combatting Trafficking in Persons Policy, 05/01/2016: nvidia.com] Score 2 • Not met: Number grievances filed, addressed or resolved: The Company in its 2019 CSR Report says "We've been RBA members since 2007 and have adopted the RBA Code and integrated its elements into our program, including auditing critical suppliers and conducting internal assessments to confirm that we are addressing all aspects of responsible supply chain management...We also comply with the RBA's guidance regarding stakeholder grievances related to our social or environmental performance". However there is no detail regarding the number of human rights issues which have been filed, addressed or resolved. [CSR Report 2019, 2019: nvidia.com] • Not met: Channel is available in all appropriate languages: The Company in its 2019 CSR Report says "We've been RBA members since 2007 and have adopted the RBA Code and integrated its elements into our program, including auditing critical suppliers and conducting internal assessments to confirm that we are addressing all aspects of responsible supply chain management...We also comply with the RBA's guidance regarding stakeholder grievances related to our social or environmental performance". However there is no information about whether the grievance channel is available in all appropriate languages. [CSR Report 2019, 2019: nvidia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Expect ICT supplier to have equivalent grievance systems: The Company in its 2019 CSR Report says "We've been RBA members since 2007 and have adopted the RBA Code and integrated its elements into our program, including auditing critical suppliers and conducting internal assessments to confirm that we are addressing all aspects of responsible supply chain management...We also comply with the RBA's guidance regarding stakeholder grievances related to our social or environmental performance". However there is no information about whether the company expects its suppliers to have an equivalent mechanism. [CSR Report 2019, 2019: nvidia.com] • Not met: Opens own system to ICT supplier workers: The Company in its 2019 CSR Report says "We've been RBA members since 2007 and have adopted the RBA Code and integrated its elements into our program, including auditing critical suppliers and conducting internal assessments to confirm that we are addressing all aspects of responsible supply chain management...We also comply with the RBA's guidance regarding stakeholder grievances related to our social or environmental performance". However there is no information about whether the company opens its own system to IT supplier workers. [CSR Report 2019, 2019: nvidia.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Grievance mechanism for community: The Company says in its 2019 CSR Report "We are committed to a strong workplace culture that provides effective grievance mechanisms for our employees. To report practices or actions believed to be inappropriate or illegal, employees have several channels through which to report, including our human resources departments, a suggestion box, and a third-party anonymous service." However the paragraph only refers to employees, and thus it is not clear if those grievance channels are accessible to external individuals and communities [CSR Report 2019, 2019: nvidia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages: The Company says in its 2019 CSR Report "We are committed to a strong workplace culture that provides effective grievance mechanisms for our employees. To report practices or actions believed to be inappropriate or illegal, employees have several channels through which to report, including our human resources departments, a suggestion box, and a third-party anonymous service." However the paragraph only refers to employees, and thus it is not clear if those grievance channels are accessible to external individuals and communities [CSR Report 2019, 2019: nvidia.com] • Not met: Expects ICT supplier to have community grievance systems: The Company says in its 2019 CSR Report "We are committed to a strong workplace culture that provides effective grievance mechanisms for our employees. To report practices or actions believed to be inappropriate or illegal, employees have several channels through which to report, including our human resources departments, a suggestion box, and a third-party anonymous service." However the paragraph only refers to employees, and thus it is not clear if those grievance channels are accessible to external individuals and communities [CSR Report 2019, 2019: nvidia.com] • Not met: ICT supplier communities use global system: The Company says in its 2019 CSR Report "We are committed to a strong workplace culture that provides effective grievance mechanisms for our employees. To report practices or actions believed to be inappropriate or illegal, employees have several channels through which to report, including our human resources departments, a suggestion box, and a third-party anonymous service." However the paragraph only refers to employees, and thus it is not clear if those grievance channels are accessible to external individuals and communities [CSR Report 2019, 2019: nvidia.com]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages users to create or assess system: The Company in its 2019 CSR Report says, "To track engagement and retention trends, we conduct a global employee survey every 18-24 months, and the participation level is at 95 percent. We ask for feedback across 13 dimensions, including strength of culture, engagement, satisfaction, vision and direction, and work-life flexibility. The survey repeatedly tells us that our employees feel great pride in the company — 90 percent recommend NVIDIA as a great place to work and 96 percent believe that". However it is not clear whether this process is used to incorporate feedback into the grievance mechanism. [CSR Report 2019, 2019: nvidia.com] • Not met: Description of how they do this: The Company in its 2019 CSR Report says, "To track engagement and retention trends, we conduct a global employee survey every 18-24 months, and the participation level is at 95 percent. We ask for feedback across 13 dimensions, including strength of culture, engagement,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>satisfaction, vision and direction, and work-life flexibility. The survey repeatedly tells us that our employees feel great pride in the company — 90 percent recommend NVIDIA as a great place to work and 96 percent believe that". However it is not clear whether this process is used to incorporate feedback into the grievance mechanism. [CSR Report 2019, 2019: nvidia.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance: he Company in its 2019 CSR Report says, "To track engagement and retention trends, we conduct a global employee survey every 18-24 months, and the participation level is at 95 percent. We ask for feedback across 13 dimensions, including strength of culture, engagement, satisfaction, vision and direction, and work-life flexibility. The survey repeatedly tells us that our employees feel great pride in the company — 90 percent recommend NVIDIA as a great place to work and 96 percent believe that". However it is not clear whether this process is used to incorporate feedback into the grievance mechanism. [CSR Report 2019, 2019: nvidia.com] • Not met: Provides user engagement example on performance: he Company in its 2019 CSR Report says, "To track engagement and retention trends, we conduct a global employee survey every 18-24 months, and the participation level is at 95 percent. We ask for feedback across 13 dimensions, including strength of culture, engagement, satisfaction, vision and direction, and work-life flexibility. The survey repeatedly tells us that our employees feel great pride in the company — 90 percent recommend NVIDIA as a great place to work and 96 percent believe that". However it is not clear whether this process is used to incorporate feedback into the grievance mechanism. [CSR Report 2019, 2019: nvidia.com] • Not met: ICT suppliers consult users in creation or assessment: The Company in its 2019 CSR Report says, "To track engagement and retention trends, we conduct a global employee survey every 18-24 months, and the participation level is at 95 percent. We ask for feedback across 13 dimensions, including strength of culture, engagement, satisfaction, vision and direction, and work-life flexibility. The survey repeatedly tells us that our employees feel great pride in the company — 90 percent recommend NVIDIA as a great place to work and 96 percent believe that". However it is not clear whether this process is used to incorporate feedback into the grievance mechanism. [CSR Report 2019, 2019: nvidia.com]
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Response timescales: The Company says, "We also comply with the RBA's guidance regarding stakeholder grievances related to our social or environmental performance". However it doesn't provide any detail as to response timeframes for complaints. [CSR Report 2019, 2019: nvidia.com] • Not met: How complainants will be informed: The Company says, "We also comply with the RBA's guidance regarding stakeholder grievances related to our social or environmental performance". However it doesn't provide any detail as to how complainants will be informed. [CSR Report 2019, 2019: nvidia.com] • Not met: Who is handling the complaint [CSR Report 2019, 2019: nvidia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level: The Company says, "We also comply with the RBA's guidance regarding stakeholder grievances related to our social or environmental performance". However it doesn't provide any further detail on the complaint process. [CSR Report 2019, 2019: nvidia.com]
C.5	Commitment to non-retaliation over complaints or concerns made	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Public statement prohibiting retaliation: The Company states that it will take appropriate disciplinary action for any retaliation against someone making a complaint in good faith, bringing a potential violation to the attention of management, or participating or assisting in an investigation. However, it is not clear if external stakeholders are covered by this commitment. [Code of Conduct: nvidia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Practical measures to prevent retaliation • Not met: Has not retaliated in practice • Not met: Expects ICT suppliers to prohibit retaliation
C.6	Company involvement with State-based judicial and non-judicial	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)

Indicator Code	Indicator name	Score (out of 2)	Explanation
	grievance mechanisms		
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage in supplier code or contracts • Not met: Improving living wage practices of suppliers Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress
D.4.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Avoids business model pressure on HRs: The Company details its supplier selection process requirements for FoA & CB, Child Labour, and Forced labour, which says "We ask our suppliers to submit RBA Self Assessment Questionnaires on an annual basis, in which they self-report information on...[child labor, forced labour, FoA & CB]. We validate this with critical tier 1 suppliers through the RBA Validated Audit Process protocol. " However this does not provide sufficient detail on the practices it adopts to avoid undermining human rights. [CSR Report 2019, 2019: nvidia.com] Score 2 <ul style="list-style-type: none"> • Not met: Positive incentives to respect human rights: The Company details its supplier selection process requirements for FoA & CB, Child Labour, and Forced labour, which says "We ask our suppliers to submit RBA Self Assessment Questionnaires on an annual basis, in which they self-report information on...[child labor, forced labour, FoA & CB]. We validate this with critical tier 1 suppliers through the RBA Validated Audit Process protocol...We implemented a performance-based award system for strategic suppliers. " However this does not provide sufficient detail of the positive incentives put in place through its purchasing practices to encourage suppliers respect for human rights. [CSR Report 2019, 2019: nvidia.com]
D.4.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Identifies suppliers back to product source Score 2 <ul style="list-style-type: none"> • Not met: Discloses significant parts of supply chain and why
D.4.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Child Labour rules in codes or contracts: Although the Company is a member of the RBA, this is not sufficient detail for this indicator. Additionally the information in the 2019 CSR Report doesn't contain sufficient detail to receive points for this indicator. [CSR Report 2019, 2019: nvidia.com] Score 2 <ul style="list-style-type: none"> • Not met: How working with suppliers on child labour: Although the Company is a member of the RBA, this is not sufficient detail for this indicator. Additionally the information in the 2019 CSR Report doesn't contain sufficient detail to receive points for this indicator. [CSR Report 2019, 2019: nvidia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Debt and fees rules in codes or contracts: The Company indicates that it is a full member of the RBA and requires its suppliers to comply with the RBA Code of Conduct, which states 'forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used...workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker'. [CSR Report 2019, 2019: nvidia.com] Not met: How working with suppliers on debt & fees <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provide analysis of trends in progress made
D.4.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Free movement rules in codes or contracts: The Company indicates that it is a full member of the RBA and requires its suppliers to comply with the RBA Code of Conduct, which states 'All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law.' [CSR Report 2019, 2019: nvidia.com] Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provide analysis of trends in progress made
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: FoA & CB rules in codes or contracts: Although the Company is a member of the RBA, this is not sufficient detail for this indicator. Additionally the information in the 2019 CSR Report doesn't contain sufficient detail to receive points for this indicator. [CSR Report 2019, 2019: nvidia.com] Not met: How working with suppliers on FoA and CB: The Company says "We ask our suppliers to submit RBA Self Assessment Questionnaires on an annual basis, in which they self-report information on freedom of association and collective bargaining. We validate this with critical Tier 1 suppliers through the RBA Validated Audit Process protocol... We assessed compliance with updated RBA Code with respect to labor fees and freedom of association." However this is insufficient detail to receive points for this indicator. [CSR Report 2019, 2019: nvidia.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provide analysis of trends in progress made
D.4.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Sets out clear Health and Safety requirements: The Company indicates that it is a full member of the RBA and requires its suppliers to comply with the RBA Code of Conduct, which sets out Health and Safety expectations on subjects including: Occupational Safety; Emergency Preparedness; Occupational Injury and Illness; Industrial Hygiene; Physically Demanding Work; Machine Safeguarding; Sanitation, Food and Housing; Health and Safety Communication. [CSR Report 2019, 2019: nvidia.com] Not met: Injury rate disclosures Not met: Lost days or near miss disclosures Not met: Fatalities disclosures Not met: Occupational disease rates <p>Score 2</p> <ul style="list-style-type: none"> Not met: How working with suppliers on H&S Not met: Provide analysis of trends in progress made
D.4.8.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Women's rights in codes or contracts Not met: How working with suppliers on women's rights <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both requirement under score 1 met Not met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.9.b	Working hours (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Working hours in codes or contracts: Although the company is a member of the RBA, the code of conduct states that "Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days". However the 60 hour limit is not consistent with the ILO international Standards of a 48 hour working week, with additional hours paid at overtime. [CSR Report 2019, 2019: nvidia.com & Code of Conduct: nvidia.com] Not met: How working with suppliers on working hours: The company says "We tracked supplier working hours through VAP, CAPs, or RBA working-hours templates. We worked with suppliers to address and comply with zero hiring fees and freely chosen employment. We assigned Learning Academy courses to eight suppliers, including: Hours of Work; Working Hours Recording System; Working Hours Management System". However this is not sufficient detail to receive points for this indicator. [CSR Report 2019, 2019: nvidia.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provide analysis of trends in progress made
D.4.10.a	Responsible Mineral Sourcing: Arrangements with Suppliers and Smelters/Refiners in the Mineral Resource Supply Chains	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Responsible mineral sourcing due diligence in supplier contracts: The Company states that it expects 'our suppliers to acquire materials from conflict-free sources within the DRC and to provide their supply chain conflict minerals information to us using the RMI conflict minerals reporting template.' Additionally in its SEC Form SD it states 'Our conflict minerals due diligence program is designed to conform in all material respects with the framework recommended by the Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, or the OECD Guidance, as it relates to our supply chain position as a "downstream" purchaser'. As part of this due diligence process the company says 'As a member of the RBA, required that our suppliers and contract manufacturers acknowledge and implement the RBA's Code of Conduct, which includes an obligation to conduct due diligence regarding conflict minerals'. However, no evidence found on whether it incorporates in commercial contracts or written agreements with suppliers responsible sourcing policy and requirements to conduct due diligence in accordance with OECD Guidance. [Conflict Minerals Policy, 19/01/2016: nvidia.com & Conflict Minerals Report 2018, 31/5/2018: webcache.googleusercontent.com] Not met: Builds capacity with smelters/refiners: 'We are also part of the Smelter Engagement Team sub-work group of the RMI, which performs outreach to smelters, encouraging recognized smelters and refiners to participate in the RMAP. Apart from our participation with the Smelter Engagement Team, since 2013 we have also contacted approximately 40 smelters and refiners directly to encourage them to be audited through RMAP.' However, unclear how the Company works with suppliers in capacity building. [Conflict Minerals Report 2018, 31/5/2018: webcache.googleusercontent.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Disclosure of smelter information in supplier requirements: As stated above, the Company states: 'As a member of the RBA, required that our suppliers and contract manufacturers acknowledge and implement the RBA's Code of Conduct, which includes an obligation to conduct due diligence regarding conflict minerals'. Part of the RBA requires participants to exercise due diligence on the source of conflict minerals and make them available to the customer upon request. [Conflict Minerals Report 2018, 31/5/2018: webcache.googleusercontent.com] Not met: Responsible conflict mineral sourcing covers all minerals
D.4.10.b	Responsible Mineral Sourcing: Risk Identification in Mineral Supply Chain	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Risk identification and disclosure in line with OECD Guidance: As indicated below, the Company carries out a survey process to identify smelters and compares them with lists of smelters and refiners considered as 'Compliant'. However, no further details found, including which are the risks identified. [Conflict Minerals Report 2018, 31/5/2018: webcache.googleusercontent.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Identification of smelter/refiners and OECD due diligence: The Company identified suppliers that supplied products containing 3TG, requested from those suppliers to provide information regarding smelters or refiners through the Conflict Minerals Reporting Template, compared that evidence with the list of 3TG that have received a "compliant" designation by the RMAP, and engaging with suppliers to get the best information possible. The Company relied in third party audits. [Conflict Minerals Report 2018, 31/5/2018: webcache.googleusercontent.com] Score 2 • Not met: Discloses smelters/refiners judged in line with OECD due diligence: The Company discloses a list of both Compliant and Active Smelters and Refiners, but it is not clear which are 'Compliant' [Conflict Minerals Report 2018, 31/5/2018: webcache.googleusercontent.com] • Not met: Responsible conflict mineral sourcing covers all minerals
D.4.10.c	Responsible Mineral Sourcing: Risk Management in the Mineral Supply Chain	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes mineral risk management plan for supply chain: The Company describes steps taken, which include, among others: 'contacted certain smelter and refinery facilities that have not received a "complaint" designation from an independent third-party audit program to encourage participation'; 'risk mitigation and response plan to monitor and track unresponsive suppliers'; 'requested certain suppliers remove specific smelters or refiners'; The Company also reports to be part of a sub-group work of the RMI that performs outreach to smelters encouraging them to participate in the RMAP. [Conflict Minerals Report 2018, 31/5/2018: webcache.googleusercontent.com] • Not met: Monitoring, tracking and whether better risk prevention/mitigation over time <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Supplier and stakeholders engaged in risk management strategy • Not met: Responsible conflict mineral sourcing covers all minerals

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 7.96 out of 80 points scored in themes A-D & F has been applied to produce a score of 1.99 out of 20 points for theme E.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.27 out of 4	Out of a total of 44 indicators assessed under sections A-D of the benchmark, NVIDIA Corporation made data public that met one or more elements of the methodology in 14 cases, leading to a disclosure score of 1.27 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company reports on GRI: The Company reports on GRI index and includes human rights issues, such as freedom of association and collective bargaining, child labour, forced or compulsory labour, and diversity and equal opportunity. [CSR Report 2018, 2018: nvidia.com] • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0 out of 4	<p>NVIDIA Corporation met 0 of the 8 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) <p>Discussing challenges openly</p> <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2019 Key Findings report and technical annex for more details of the research process.

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.