

Company Name Nvidia
Industry ICT (Supply Chain only)
Overall Score 14.2 out of 100

Theme Score	Out of	For Theme
3.1	10	A. Governance and Policies
1.4	25	B. Embedding Respect and Human Rights Due Diligence
3.5	20	C. Remedies and Grievance Mechanisms
3.3	25	D. Performance: Company Human Rights Practices
2.8	20	E. Performance: Responses to Serious Allegations

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 2022 Methodology document for the sector concerned. 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	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Universal Declaration of Human rights (UDHR): The Human Rights policy states that 'we endorse internationally recognized human rights principles, including [...] the Universal Declaration of Human Rights' Score 2 <ul style="list-style-type: none"> Met: Commitment to the UNGPs: The Human Rights policy states that 'we endorse internationally recognized human rights principles, including [...] the United Nations Guiding Principles' [Human Rights Policy, 07/07/2022: nvidia.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Company has a commitment to the ILO Core: The Human Rights policy states that 'we endorse internationally recognized human rights principles, including [...] ILO Declaration of Fundamental Principles and rights at work' [Human Rights Policy, 07/07/2022: nvidia.com] Not Met: Company has an explicit commitment to All four ILO Core: The Human Rights policy states that 'we do not engage in child labor, forced, bonded, or indentured labor, involuntary prison labor, slavery, trafficking of persons, or physical punishment. We provide equal opportunity for all applicants and employees [...] 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 rights to refrain from such activities'. However, it is not clear whether it is committed to promote & respect freedom of association and collective bargaining in all contexts, as it indicates 'as defined by local laws'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to provide alternative mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Human Rights Policy, 07/07/2022: nvidia.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company expect suppliers to commit to ILO Core: See above. The Human Rights policy states that 'We expect our suppliers to maintain progressive employment, environmental, health, safety, and ethical practices that meet or exceed [...] this Human Rights Policy'. [Human Rights Policy, 07/07/2022: nvidia.com] • Not Met: Company explicitly list All four ILO for suppliers: The CSR Report 2020 indicates that 'manufacturing suppliers comply with (...) NVIDIA's Code of Conduct' among other requirements. As it was mentioned above, the code covers forced and child labour, discrimination 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'. The Human Rights policy presents a similar situation in relation to freedom of association and collective bargaining. [Code of Conduct, 2020: nvidia.com] & [Human Rights Policy, 07/07/2022: nvidia.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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: Commitment to respect H&S of workers: The Company indicates that 'NVIDIA is committed to providing a safe and healthy environment for our employees'. [Environmental Health Safety Energy Policy, 26/02/2018: nvidia.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: The Company indicates that 'We offer competitive wages and benefits worldwide and honor working hours and work weeks that meet or exceed local laws'. A similar commitment is placed in the Human Rights policy, which also includes a commitment to endorse the ILO Declaration. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. [Code of Conduct, 2020: nvidia.com] & [Human Rights Policy, 07/07/2022: nvidia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: Suppliers are expected to follow the RBA code, which contains a specific section on health and safety including requirements on occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food and housing, and health and safety communication'. [RBA Code of Conduct, 2018: responsiblebusiness.org] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The RBA code, required for suppliers, 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. All overtime must be voluntary, workers shall be allowed at least one day off every seven days'. No evidence found, however, in relation to not require workers to work more than 48 hours in a regular work week, or to comply with ILO conventions on working hours. Although suppliers are also required to comply with the Company's human rights policy, this document doesn't contain a commitment to working hours that meets CHRB requirements. [RBA Code of Conduct, 2018: responsiblebusiness.org]
A.1.3.a.ICT	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (ICT)	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: Responsible mineral sourcing: The Company indicates that 'NVIDIA is committed to the responsible sourcing of minerals'. [Responsible Minerals Policy, 04/01/2022: images.nvidia.com] • Met: Based on OECD Guidance: It also states that 'We have implemented chain of custody due diligence practices designed to reasonably assure that minerals in our products are sourced consistently with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs)'. [Responsible Minerals Policy, 04/01/2022: images.nvidia.com] • Met: Requires suppliers to commit to responsible mineral sourcing: The Responsible Minerals Policy indicates that 'NVIDIA expects its suppliers to conduct

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>their business in accordance with this policy, including (...) acquire materials from conflict-free sources, including within the DRC'. [Responsible Minerals Policy, 04/01/2022: images.nvidia.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commits to follow OECD Guidance for 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 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. The Company has provided comments to CHRB regarding this subindicator. However, evidence was already in use. This subindicator looks for commitment to apply OECD guidelines for all minerals that are beyond 3TG, including any other mineral used in its products, such as cobalt, mica, etc. [Responsible Minerals Policy, 04/01/2022: images.nvidia.com] & [2021 Conflict Minerals Report, 31/05/2022: d18rn0p25nwr6d.cloudfront.net] • Not Met: Suppliers expected to make similar requirements of their suppliers: The Company has provided comments to CHRB regarding this subindicator. However, evidence was already in use. This subindicator looks for commitment to apply OECD guidelines for all minerals that are beyond 3TG, including any other mineral used in its products, such as cobalt, mica, etc. [Responsible Minerals Policy, 04/01/2022: images.nvidia.com]
A.1.3.b.ICT	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (ICT)	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 • Not Met: Children's rights • Not Met: Migrant worker's rights • Not Met: Expects suppliers to respect at least one of these rights: The previous assessment was partially based on CSR Report 2020 which CHRB no longer considers a suitable source for policy statements. No further evidence found, in relation to whether the Company requires its suppliers to follow the RBA code or it has specific requirements for them in relation to women, children, or migrant workers' rights. <p>Score 2</p> <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 remedy	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: The Company commits to remedy: The Human Rights policy states that 'we are committed to facilitating access to effective justice and remedy [...]' Under the direction of the NCGC [Nominating and Corporate Governance Committee], our Compliance Committee will promptly investigate allegations of human rights violations and pursue actions to mitigate and remediate any adverse human rights impacts' [Human Rights Policy, 07/07/2022: nvidia.com] & [CSR Report 2020, 2020: nvidia.com] • Met: Company expect suppliers to make this commitment: See above. The Human rights policy also indicates that 'We expect our suppliers to maintain progressive employment, environmental, health, safety, and ethical practices that meet or exceed [...] this Human Rights Policy'. [Human Rights Policy, 07/07/2022: nvidia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives • Not Met: Work with suppliers to remedy impact
A.1.5	Commitment to respect the rights of human rights defenders	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: Zero tolerance attacks on HRs Defenders (HRDs): The Human rights policy states that 'We do not tolerate retaliation against anyone for making a complaint in good faith, bringing a potential violation to the attention of management, or participating or assisting in an investigation'. No further details found, including commitment to not tolerate threats or retaliation against human rights defenders. Although there's no need to explicitly mention human rights defenders, it is not clear if the commitment also includes people who oppose the Company's operations or have raised questions about its activities, whoever they are. [Human Rights Policy, 07/07/2022: nvidia.com] • Not Met: Company expect suppliers to make this commitment [Human Rights Policy, 07/07/2022: nvidia.com]

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			Score 2 <ul style="list-style-type: none"> Not Met: Work with HRD to create safe and enabling environment: The Company has provided feedback to CHRB regarding this indicator. However, evidence was not material. [Human Rights Policy, 07/07/2022: nvidia.com]

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Board level responsibility for HRs: The Human Rights policy states that 'The Nominating and Corporate Governance Committee (NCGC) of the Board of Directors has oversight over policies and practices in connection with human rights, including this Human Rights Policy'. [Human Rights Policy, 07/07/2022: nvidia.com] Not Met: Describe HR expertise of Board member Score 2 <ul style="list-style-type: none"> Not Met: Speeches/letters by Board members or CEO
A.2.2	Board responsibility	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Board/Committee review HRs strategy: The Human rights policy indicates that 'The NCGC [nominating and Corporate Governance Committee] undertakes all actions it deems reasonable and necessary to ensure compliance with this Human Rights Policy, conducting regular consultation with a cross-functional business, legal, and technical team within NVIDIA, including senior-level management, and seeking input from third-party stakeholders and experts. [...]. The NCGC provides regular updates to the entire Board of Directors regarding human rights impacts and compliance with this Human Rights Policy. [Human Rights Policy, 07/07/2022: nvidia.com] Not Met: Examples/trends re HR discussion in the last reporting period Score 2 <ul style="list-style-type: none"> Not Met: Meets both requirements under score 1 Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Incentives for at least one board member Not Met: At least one key HR risk, beyond employee H&S: The Company has provided comments to CHRB regarding this subindicator. However, evidence was not material. This subindicator looks for evidence of how the Company provides remuneration incentives for performance in relation to Company's human rights issues to Supervisory Board members. [Human Rights Policy, 07/07/2022: nvidia.com] Score 2 <ul style="list-style-type: none"> Not Met: Performance criteria made public Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Board process to review business model and strategy: The human Rights policy states that 'The Nominating and Corporate Governance Committee of the Board of Directors (NCGC) has oversight over policies and practices in connection with human rights, including this Human Rights Policy. The NCGC undertakes all actions it deems reasonable and necessary to ensure compliance with this Human Rights Policy, conducting regular consultation with a cross-functional business, legal, and technical team within NVIDIA, including senior-level management, and seeking input from third-party stakeholders and experts. The NCGC provides regular updates to the entire Board of Directors regarding human rights impacts and compliance with this Human Rights Policy'. No details were found, however, on whether this processes can trigger a board process to review business model or strategy for inherent risks to human rights. Current evidence seems to refer to supervision policy compliance, rather to whether Company's business model can be reviewed as consequence of impacts on human rights. The policy also states that 'When we create new products, platforms, or services, we have an interdisciplinary team evaluate whether our offerings could be used in conflict with this Human Rights Policy and provide recommendations to minimize any such risk'. It is not clear, however, whether these evaluations reach board level and can affect the Company's strategy or business model. [Human Rights Policy, 07/07/2022: nvidia.com] Not Met: Describe frequency and triggers for reviewing

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			Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Not Met: Senior responsibility for HR implementation and decision making: The Company indicates that the Supervisory Board's NCGC conducts 'regular consultation with a cross-functional business, legal and technical team within NVIDIA, including senior-level management, and seeking input from third-party stakeholders and experts'. However, it is not clear if there's a specific senior manager role (person or committee at senior executive level) accountable for implementation and decision making on human rights issues within the Company. [Human Rights Policy, 07/07/2022: nvidia.com] Score 2 <ul style="list-style-type: none"> • Not Met: How it assigns Day-to-day responsibility: Although the Company indicates, as indicated above, that it's Board level committee regularly consults with people at senior management level, no details found in relation to how it assigns responsibility for implementing its human rights policy commitments for day-to-day management. [Human Rights Policy, 07/07/2022: nvidia.com] • Not Met: Day-to-day resources and expertise allocation in own ops: Although the Company indicates, as indicated above, that it's Board level committee regularly consults with people at senior management level, no details found in relation to how it allocates resources and expertise for the day-to-day management of relevant human right issues within its own operations. [Human Rights Policy, 07/07/2022: nvidia.com] • Not Met: Resources and expertise allocation in the supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Senior manager incentives for human rights • Not Met: At least one key HR risk, beyond employee H&S: The Company has provided comments to CHRB regarding this subindicator. However, evidence was not material. This subindicator looks for evidence of how the Company provides remuneration incentives for performance in relation to Company's human rights issues to senior executive members. Score 2 <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: HR risks is integrated as part of enterprise risk system • Not Met: Provides an example Score 2 <ul style="list-style-type: none"> • Not Met: Audit Ctte or independent risk assessment: The Human rights policy indicates that 'Under the direction of the NCGC [Nominating and Corporate Governance Committee], our Compliance Committee will promptly investigate human rights allegations and pursue actions to mitigate and remediate any adverse human rights impacts'. However, this indicator looks for evidence of the Company assessing adequacy of the ERM in managing human rights risks, in case the Company has integrated human rights within the company enterprise risk management system. In that case, that evaluation is either carried out by a thirds party or is overseen by the Board's Audit Committee.
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Communicates its policy to all workers in own operations: The Code of conduct states that 'we complete training on our code upon hire and then every two years'. The Code contains human rights commitments. Training is assumed to take place in workers' local language. [Code of Conduct, 2020: nvidia.com] & [Company policies website, N/A: nvidia.com] Score 2 <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: How policy commitments are made accessible to audience: The Code of conduct states that Every 'NVIDIA employee and board member is expected to read, understand, and comply with Our Code [...] Along with the corporate guidelines and policies linked within Our Code, we also follow the additional policies on NVINFO. The Company clarifies that NVINFO is the Company's intranet. Although the Company's policies are available both on the external website and the intranet, this subindicator looks for evidence of how the Company ensures that communications made to external stakeholders (not suppliers) are made accessible to its intended audience (frequency and form in which communications take place). [Code of Conduct, 2020: nvidia.com] & [Company policies website, N/A: nvidia.com]
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a • Met: Requires suppliers to communicate policy requirements: The Company states that 'All our suppliers are required to comply with NVIDIA's code of conduct, our CSR Directive, and our policies related to human rights. They're required to sign an "Agreement for Manufacturer Environmental Compliance," which includes all relevant product regulatory compliance standards, social compliance standards, chemical management, and the RBA Code. We also encourage them to use the RBA Code as a platform to go above and beyond compliance'. 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'. [CSR Report 2021, 25/06/2022: images.nvidia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: As indicated above, all suppliers are required to sign an 'agreement for manufacturer environmental Compliance', a document in which the RBA code is embedded. [CSR Report 2021, 25/06/2022: images.nvidia.com] • Not Met: Company requires suppliers to cascade down to their 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.a • Met: How workers are trained 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, 2020: nvidia.com] • Not Met: Trains relevant managers including procurement: The Company states that 'we train our Worldwide Field Operations team on this Human Rights Policy'. However, this subindicator looks for specific evidence of training for relevant managers, including at least procurement, in relation to human rights aspects relevant to their role. [Human Rights Policy, 07/07/2022: nvidia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet company's HR commitment • Met: Disclose % trained: The Company states in its CSR Report that 'All NVIDIA employees receive ethics and sexual harassment training. Upon hire and then every two years thereafter they also complete training in our code of conduct, which covers environmental and social responsibility issues. As of March 2021, nearly 100% of employees had completed this training.' [CSR Report 2021, 25/06/2022: images.nvidia.com]
B.1.6	Monitoring and corrective actions	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.a • Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company states that 'We evaluated all contract manufacturers and direct material suppliers on geographic location, manufacturing processes, past supplier environmental responsibility performance, and public reports. We tracked supplier working hours through VAP, CAPs, or RBA working hours templates. We worked with suppliers to ensure their compliance with the principles of zero hiring fees and freely chosen employment'. It is not clear, however, how it monitors compliance within its own workforce. [CSR Report 2021, 25/06/2022: images.nvidia.com] • Met: Proportion of supply chain monitored: The Company indicates that it conducted risk assessment in 100% of strategic suppliers and that 100% of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>suppliers in the top 80% of spending completed RBA self-assessment questionnaires. [CSR Report 2021, 25/06/2022: images.nvidia.com]</p> <ul style="list-style-type: none"> • Not Met: Describe how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Not Met: Describes corrective action process: The Company indicates that 'We continue monitoring to ensure that suppliers demonstrate effective processes to ensure compliance. Specific actions on non-compliance issues vary depending on the type of finding and supplier'. [CSR Report 2021, 25/06/2022: images.nvidia.com] • Met: Disclose findings and number of corrective action: The Company indicates that 'We engaged 13 suppliers on their CAPs from the FY21 auditing season. Common findings include issues related to occupational safety, emergency preparedness, working hours, freely chosen employment, and wages and benefits'. [CSR Report 2021, 25/06/2022: images.nvidia.com]
B.1.7	Engaging and terminating business relationships	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: HR affects selection of suppliers: Regarding social issues, including forced labour, child labour and FoA & CB, the Company indicates that '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 FY20'. However there is no further detail about how this information is used when deciding on potential business relationships. [CSR Report 2020, 2020: nvidia.com] • Not Met: HR affects on-going supplier relationships: Regarding social issues, including forced labour, child labour and FoA & CB, the company indicates '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'. In the CSR 21 report it states that 'for strategic suppliers, agreements are deployed and tracked through a quarterly business review (QBR) process to make certain that they uphold our requirements. Business allocation decisions are influenced by QBR performance. Each quarter, overall supplier assessment is reviewed by product category and performance is ranked. Five of 100 QBR points are allocated to CSR issues, and requirements vary by quarter. However there is no further detail about how this information is used when making decisions to renew or terminate business relationships, and up to what level human rights are relevant considering that CSR as a whole account for 5% of the score. [CSR Report 2020, 2020: nvidia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered 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 2020, 2020: nvidia.com] • Met: Working with suppliers to meet HR requirements: The Company indicates that 'We worked with suppliers to ensure their compliance with the principles of zero hiring fees and freely chosen employment. We assigned Learning Academy courses to 11 suppliers: 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, and Improving Your Dormitories'. [CSR Report 2020, 2020: nvidia.com]
B.1.8	Approach to engagement with affected stakeholders	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 to identify and engage with workers/communities in the last two years • Not Met: Discloses stakeholders that HRs may be affected • Not Met: Provides two examples of engagement with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues • Not Met: Describe how views influenced company's HR approach

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	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: Identifying risks in own operations: The Company indicates in its human rights policy that 'we regularly assess human rights-related risks and potential impacts, review our policies and seek input from stakeholders on our approach'. It also indicates that 'when we provide tools to help developers create applications for specific industries, we focus on creating products and services that enable developers to create and accelerate socially beneficial applications that will promote human welfare everywhere'. However, not description was found in relation to the actual processes followed to identify which are the Company's potential impacts on human rights in its own operations. [Human Rights Policy, 07/07/2022: nvidia.com] • Not Met: Identifying risks through relevant business relationships: We conduct diligence on our customers and do not pursue any business that we believe to be illegal, unethical, or immoral. We expect our customers to respect human rights whenever they use our products or services. <p>We cross-check all customers against the restrictions imposed by U.S. agencies. We require all customers, resellers, and distributors to follow U.S. export control laws, as well as all applicable restrictions on the sale, distribution, and use of our products. Where we lack sufficient information on a potential customer to make an informed decision, we use a third party to provide independent research to ensure that NVIDIA does not make any prohibited sale [Human Rights Policy, 07/07/2022: nvidia.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: The Company indicates in its human rights policy that 'we regularly assess human rights-related risks and potential impacts, review our policies and seek input from stakeholders on our approach'. However, no details found in relation to the actual ongoing process, stakeholders engaged and whether it engages with human rights experts in impact identification. [Human Rights Policy, 07/07/2022: nvidia.com] • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
B.2.2	Assessing human rights risks and impacts	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: Describe process for assessment of HR risks and discloses salient HR issues: The Company indicates that 'We conduct diligence on our customers and do not pursue any business that we believe to be illegal, unethical, or immoral. We expect our customers to respect human rights whenever they use our products or services. We cross-check all customers against the restrictions imposed by U.S. agencies. We require all customers, resellers, and distributors to follow U.S. export control laws, as well as all applicable restrictions on the sale, distribution, and use of our products. Where we lack sufficient information on a potential customer to make an informed decision, we use a third-party to provide independent research to ensure that NVIDIA does not make any prohibited sale'. However, this seems to focus on assessments downstream (end user). This subindicator looks for evidence of how the Company assesses its risks and impacts as consequence of the creation of its products and services. [Human Rights Policy, 07/07/2022: nvidia.com] • Not Met: How process applies to supply chain: The Company provides a chart where it describes performance against RBA membership, including risk assessments on all suppliers, self assessment questionnaires, validated audit process, corrective action plans, compliance with labor, health and safety, ethics, etc. However, this indicator looks for evidence of the Company indicating which are its specific issues assessed as salient following a due diligence process of risk identification and assessment. However, this evidence seems to focus in how the Company monitors compliance with specific issues. This subindicator looks for evidence of how the Company has a process that allows them to assess which are the relevant risks that it faces. [CSR Report 2021, 25/06/2022: images.nvidia.com] • Not Met: Public disclosure of the results of HR assessment: The Company indicates that 'due to the nature of our business model as a fables semiconductor manufacturer, the risk of modern slavery and human trafficking within our own business operations is relatively low. Our exposure to the risk of citations for general labor and ethics violations is extremely low to non-existent and we have a robust system for soliciting and rectifying confidential notifications on suspected

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>labor or ethics issues. Therefore we view our supply chain as presenting the greater risk in respect of slavery and trafficking'. However, no further details found (including last revision) in relation to which are the Company's salient issues. This seems to focus in exposure to specific risk, rather than the outcome of a complete due diligence process that allows an integral saliency assessment. [CSR Report 2020, 2020: nvidia.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: How it involved affected stakeholders in the assessment
B.2.3	Integrating and acting on human rights risks and impact assessments	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: Action Plans to mitigate risks: In its CSR report the Company discloses a chart showing its performance against the different elements of the Responsible Business Alliance. However, this indicator looks for a systematic approach, within a due diligence context, to take broad actions to mitigate risks, following a risk-based approach rather than an individual supplier performance monitoring. The Company also indicates that 'We conduct diligence on our customers and do not pursue any business that we believe to be illegal, unethical, or immoral. We expect our customers to respect human rights whenever they use our products or services. We cross-check all customers against the restrictions imposed by U.S. agencies. We require all customers, resellers, and distributors to follow U.S. export control laws, as well as all applicable restrictions on the sale, distribution, and use of our products. Where we lack sufficient information on a potential customer to make an informed decision, we use a third-party to provide independent research to ensure that NVIDIA does not make any prohibited sale'. However, this seems to focus on assessments downstream (end user). This subindicator looks for evidence of how the Company takes actions to face known risks and impacts (following a due diligence process) as consequence of the creation of its products and services. [CSR Report 2020, 2020: nvidia.com] & [Human Rights Policy, 07/07/2022: nvidia.com] • Not Met: Description of how global system applies to 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, these seem measures taken following each specific case of non-compliance from specific suppliers. This indicator looks for evidence of a systematic actions carried out to mitigate specific risks that have been assessed as salient, rather than implement specific measures following non-compliances. The Company also indicates that 'we reserve the right to decline any business that may conflict with this Human Rights Policy or otherwise expose NVIDIA or third parties to unacceptable risk of harm. Where we become aware of a concern that NVIDIA products are being used by a business partner in connection with abuses of human rights, we will restrict or cease business with that business partner unless and until we have high confidence that NVIDIA's products are not being used to violate human rights. However, this subindicator looks for evidence of how the Company takes actions to face known risks and impacts (following a due diligence process) as consequence of the creation of its products and services in its supply chain. [Human Rights Policy, 07/07/2022: nvidia.com] • Not Met: Example of actions decided on at least 1 salient HR issues: 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'. The Company has provided comments to CHRB regarding this indicator. However, this indicator looks for evidence of work carried out to mitigate specific salient risks or impacts. [CSR Report 2019, 2019: nvidia.com] & [CSR Report 2020, 2020: nvidia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	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: System for tracking or monitor if actions taken 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. It indicates that 30% of high or moderate risk suppliers have lowered RBA risk performance'. However, this indicator looks for a system of how it tracks broader actions to mitigate the different salient risks. Current evidence seems to refer a to a general improve in performance in compliance with code. As indicated below, the Company reports in relation to tracking corrective action plans including some specific issues. However, these seems to respond to specific cases of non-compliance. It is not clear whether overall, the company is improving in relation to those specific risks. [CSR Report 2019, 2019: nvidia.com] & [CSR Report 2020, 2020: nvidia.com] • Not Met: Lessons learnt from checking system effectiveness: The Company states 'We tracked supplier working hours through VAP, CAPs, or RBA working-hours templates. We closed CAPs covering all health and safety issues.' However, no evidence was found on lessons learned from checking the effectiveness of actions. [CSR Report 2020, 2020: nvidia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights impacts	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: Provides two examples of comms with stakeholders: The company states in its Code of Conduct that 'Refer any questions from investors or financial analysts to our CFO or Investor Relations department and any questions from the press or other media outlets to our Corporate Communications department.' However, no information found regarding stakeholder communication. The Company has provided comments to CHRB regarding this subindicator. However, no evidence found of how the Company provided a specific response in relation to concrete impacts on human rights raised by affected stakeholders. [Code of Conduct, 2020: nvidia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% 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	2	<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: 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, 2020: nvidia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Channel is available in all appropriate languages and workers aware: The Company in its 2020 CSR Report says 'We also comply with the RBA's guidance regarding stakeholder grievances related to our social and environmental performance. We use the RBA Self-Assessment Questionnaire and VAP Audit Program to validate that our suppliers have proper grievance mechanisms in place and that employees are trained in using these methods. We manage any corrective actions related to grievance mechanisms through the RBA-Online Corrective Action Plan process.' The Company also indicates that 'anyone' can lodge a complaint. The EthicsPoint is available to anyone on a website, and it is available in 7 languages.' [CSR Report 2020, 2020: nvidia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Describe how workers in the supply chain have access to grievance mechanism: The Company in its 2020 CSR Report says 'We also comply with the RBA's guidance regarding stakeholder grievances related to our social and environmental performance. We use the RBA Self-Assessment Questionnaire and VAP Audit Program to validate that our suppliers have proper grievance mechanisms in place and that employees are trained in using these methods. We manage any corrective actions related to grievance mechanisms through the RBA-Online Corrective Action Plan process'. The RBA code includes grievance mechanism requirements. It also states that it 'shall also require its next tier suppliers to acknowledge and implement the code'. [CSR Report 2020, 2020: nvidia.com] • Met: Expect Suppliers to convey expectation to their own suppliers: The Company in its 2020 CSR Report says 'We also comply with the RBA's guidance regarding stakeholder grievances related to our social and environmental performance. We use the RBA Self-Assessment Questionnaire and VAP Audit Program to validate that our suppliers have proper grievance mechanisms in place and that employees are trained in using these methods. We manage any corrective actions related to grievance mechanisms through the RBA-Online Corrective Action Plan process'. The RBA code includes grievance mechanism requirements. It also states that it 'shall also require its next tier suppliers to acknowledge and implement the code'. [CSR Report 2020, 2020: nvidia.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	<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: Grievance mechanism for community: The Company says in its 2020 CSR Report 'Anyone can confidentially and anonymously lodge a complaint about any accounting, internal control, auditing, code of conduct, conflict of interest, or other matter of concern using a corporate hotline, which is hosted by an independent third party'. [CSR Report 2020, 2020: nvidia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages and stakeholder awareness: As indicated above, 'anyone' can lodge a complaint. The EthicsPoint is available to anyone on a website, and it is available in 7 languages. [CSR Report 2020, 2020: nvidia.com] & [EthicsPoint Grievance Portal, N/A: secure.ethicspoint.com] • Met: Communities access mechanism direct or through suppliers: As above. Anyone can lodge a complaint. [CSR Report 2020, 2020: nvidia.com] • Not Met: Expect supplier to convey expectation to their own suppliers: The Company indicates in its 2020 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. The RBA Code requires 'programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers are to be maintained, unless prohibited by law. Participants should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation'. No evidence found of requirement to have a channel available for external stakeholders. [CSR Report 2020, 2020: 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 2020 CSR Report says, 'To track employee engagement and retention trends, we have conducted a global employee survey every 18 to 24 months. More than 90 percent of our workforce participates in these surveys. To pivot more quickly to address their concerns, in FY20 we moved toward an always-on survey model. Data will continue to be analyzed at a fine level, enabling us to zero in on issues that may be specific to certain teams or job levels. Our survey asks 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— 92 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 2020, 2020: nvidia.com] • Not Met: Examples (at least two) of how they do this: The Company in its 2020 CSR Report says, 'To track employee engagement and retention trends, we have conducted a global employee survey every 18 to 24 months. More than 90 percent of our workforce participates in these surveys. To pivot more quickly to address

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>their concerns, in FY20 we moved toward an always-on survey model. Data will continue to be analyzed at a fine level, enabling us to zero in on issues that may be specific to certain teams or job levels. Our survey asks 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— 92 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 2020, 2020: nvidia.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism: The Company in its 2020 CSR Report says, 'To track employee engagement and retention trends, we have conducted a global employee survey every 18 to 24 months. More than 90 percent of our workforce participates in these surveys. To pivot more quickly to address their concerns, in FY20 we moved toward an always-on survey model. Data will continue to be analyzed at a fine level, enabling us to zero in on issues that may be specific to certain teams or job levels. Our survey asks 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— 92 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 2020, 2020: nvidia.com] • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, 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 and how complainants will be informed • Not Met: Describe support (technical, financial, etc) available for equal access by complainants <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Escalation to senior/independent level: The Company indicates that Under the direction of the NCGC, our Compliance Committee will promptly investigate human rights allegations and pursue actions to mitigate and remediate any adverse human rights impacts. However, this indicator looks for evidence of how complainants (including external stakeholders) can escalate their complaints to more senior levels or independent third parties the challenge the process/outcome. [Human Rights Policy, 07/07/2022: nvidia.com]
C.5	Prohibition of retaliation for raising complaints or concerns	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. In addition, the Human Rights policy states that 'We do not tolerate retaliation against anyone for making a complaint in good faith, bringing a potential violation to the attention of management, or participating or assisting in an investigation'. [Code of Conduct, 2020: nvidia.com] & [Human Rights Policy, 07/07/2022: nvidia.com] • Not Met: Practical measures to prevent retaliation <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	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: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	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: Describes how remedy has been provided • Not Met: Says how it would provide remedy for victims if no adverse impact identified: The Company states 'When violations are discovered, we require suppliers to return hiring fees to workers' However, this falls in line with corrective actions and not remedy. [CSR Report 2020, 2020: nvidia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not Met: Changes to systems, processes and practices to stop similar impact • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) 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: Number grievances filed, addressed or resolved and outcome achieved: The Company in its 2020 CSR Report says 'We also comply with the RBA's guidance regarding stakeholder grievances related to our social and environmental performance. We use the RBA Self-Assessment Questionnaire and VAP Audit Program to validate that our suppliers have proper grievance mechanisms in place and that employees are trained in using these methods. We manage any corrective actions related to grievance mechanisms through the RBA-Online Corrective Action Plan process.' However no evidence found regarding the number of human rights grievances that have been filed, and either addressed or resolved. [CSR Report 2020, 2020: nvidia.com] • Not Met: How lessons from mechanism improve management system Score 2 <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% 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: Discloses living wage requirements in supplier code or contracts • Not Met: Improving living wage practices of suppliers Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides 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 (purchasing practices): The Company details its supplier selection process requirements for FoA & CB, Child Labour, and Forced labour, which indicates 'We ask our suppliers to submit RBA Self Assessment Questionnaires on an annual basis, in which they self-report information on...[child labour, 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 2020, 2020: nvidia.com] • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices
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 direct and indirect suppliers back to manufacturing sites (factories or fields) Score 2 <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.4.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Child Labour rules in codes or contracts: The company state 'Child labor is not to be used in any stage of manufacturing'. [CSR Report 2021, 25/06/2022: images.nvidia.com] • Met: How working with suppliers on child labour: The Company indicators 'We ask our suppliers to submit RBA Self-Assessment Questionnaires on an annual basis, in which they self-report information on child labor. We validate this with critical tier 1 suppliers through the RBA Validated Audit Process protocol.' [CSR Report 2021, 25/06/2022: images.nvidia.com] Score 2 <ul style="list-style-type: none"> • Not Met: Assessement of number affected by child labour in supply chain

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Analysis of trends in progress made
D.4.5.b	Prohibition of forced labour: Recruitment fees and 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 2020, 2020: nvidia.com] & [CSR Report 2021, 25/06/2022: images.nvidia.com] • Met: How working with suppliers on debt & fees: The Company indicates 'We use the RBA Self-Assessment Questionnaire and VAP Audit Program to validate that our suppliers have proper grievance mechanisms in place and that employees are trained to use these methods. We manage any corrective actions related to grievance mechanisms through the RBA-Online Corrective Action Plan process.' [CSR Report 2021, 25/06/2022: images.nvidia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made
D.4.5.d	Prohibition of forced labour: Wage practices (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: Requirement for suppliers to pay workers in full and on time in codes or contracts • Not Met: How working with supply chain to pay workers regularly and on time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.4.5.f	Prohibition of 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 2020, 2020: nvidia.com] & [CSR Report 2021, 25/06/2022: images.nvidia.com] • Met: How working with suppliers on free movement: The Company state 'In addition to supporting and aligning with the RBA code regarding freely chosen labor, we follow the legal requirements of the Federal Acquisition Regulation and UK Modern Slavery Act 2015. We track issues through the RBA Validated Assessment Program and work directly with suppliers to implement any corrective actions. Anyone can confidentially and anonymously report a concern about supply chain or human rights issues using a corporate hotline, which is hosted by an independent third party.' [CSR Report 2021, 25/06/2022: images.nvidia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress
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, the RBA code refers to the context 'in accordance with local laws'. It is not clear if there's a requirement to respect these rights, including non-retaliation against workers due to the exercise of these rights in countries where these rights are restricted under local laws. [CSR Report 2020, 2020: nvidia.com] • Not Met: How working with suppliers on FoA and CB: The Company states that '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 no evidence found of proactive work carried out with suppliers to improve their performance in relation to this topic. [CSR Report 2020, 2020: nvidia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress
D.4.7.b	Health and safety: Fatalities, lost days, injury, occupational disease 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 2020, 2020: nvidia.com] • Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period: The company reports 'Less than 1% of leave-of-absence requests within NVIDIA relate to work and work-related injury losses are significantly below the averages for our industry. Our recordable incident rate for FY21 is 0.07 with zero lost workdays.' [CSR Report 2021, 25/06/2022: images.nvidia.com] • Met: Fatalities disclosures for lasting reporting period: The Company reports zero fatalities for the last reporting period. [CSR Report 2021, 25/06/2022: images.nvidia.com] • Not Met: Occupational disease rates for the last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S • Not Met: Assessment of the number affected by H&S issues in the SP • 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: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provide analysis of trends in progress made
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 2020, 2020: nvidia.com] & [Code of Conduct, 2020: 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 indicator looks for proactive work carried out with suppliers to improve their performance and practices, not focused in regular audits and monitoring, [CSR Report 2020, 2020: nvidia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by excessive working hours • Not Met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> • Met: Due diligence in accordance with OECD Guidance in supplier contracts: The Company states that 'All our suppliers are required to comply with NVIDIA's code of conduct, our CSR Directive, and our policies related to human rights. They're required to sign an "Agreement for Manufacturer Environmental Compliance," which includes all relevant product regulatory compliance standards, social compliance standards, chemical management, and the RBA Code. We also encourage them to use the RBA Code as a platform to go above and beyond compliance'. The company has a commitment to the RBA CoC which says, 'Participants shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas or an equivalent and recognized due diligence framework.'. [CSR Report 2021, 25/06/2022: images.nvidia.com] & [RBA Code of Conduct, 2018: responsiblebusiness.org] • Not Met: Works with smelters/refiners and suppliers to build capacity: The Company is '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 91 smelters and refiners directly to encourage them to be audited through RMAP, including the one smelter that is undergoing review by the RMAP as no longer compliant.' However, it is unclear how the Company works with suppliers on capacity building. [Conflict Minerals Report 2019, 01/06/2020: d18rn0p25nwr6d.cloudfront.net] & [2021 Conflict Minerals Report, 31/05/2022: d18rn0p25nwr6d.cloudfront.net] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Contractual requirement to disclosure smelter/refiner information: 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'. Suppliers 'are required to sign an "Agreement for Manufacturer Environmental Compliance," which includes [...] the RBA Code.' 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 2019, 01/06/2020: d18rn0p25nwr6d.cloudfront.net] & [CSR Report 2020, 2020: nvidia.com] • Not Met: Contractual requirement covers all minerals
D.4.10.b	Responsible mineral sourcing: Risk identification and responses 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 2019, 01/06/2020: d18rn0p25nwr6d.cloudfront.net] • Met: Identification of smelter/refiners and OECD Guidance: 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 2019, 01/06/2020: d18rn0p25nwr6d.cloudfront.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses smelters/refiners judged in line with OECD Guidance: The Company discloses a list of both Compliant and Active Smelters and Refiners, but it is not clear which are 'Compliant' [Conflict Minerals Report 2019, 01/06/2020: d18rn0p25nwr6d.cloudfront.net] • Not Met: Risk identification and disclosure covers all minerals

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.10.c	Reporting on 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"> • 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 that 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. The Executive VP of operations receives 'at least quarterly updates' on conflict minerals due diligence and status. [Conflict Minerals Report 2019, 01/06/2020: d18rn0p25nwr6d.cloudfront.net] • Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time • Not Met: Disclose better risk prevention/mitigation over time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Suppliers and stakeholders engaged in risk management strategy • Not Met: Risk management and response processes cover 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 11.32 out of 80 points scored in themes A-D has been applied to produce a score of 2.83 out of 20 points for theme E.

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 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, 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.

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