



## COMBATTING TRAFFICKING IN PERSONS POLICY

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NVIDIA is committed to the highest ethical and legal standards to prohibit trafficking in persons or related activities. As a supplier to the U.S. government, we must implement and comply with this Policy. We will not tolerate or condone any NVIDIA employees, agents, subcontractors, subcontractor employees or their agents engaging in acts of trafficking in persons or related activities.

This Policy outlines NVIDIA's Combatting Trafficking in Persons Compliance Program (the Program). NVIDIA's Senior Manager of HR Operations, Jennifer Green (Ops Manager), leads the Program and is chiefly responsible for its design and implementation.

### *Prohibited Activities*

- Engaging in or supporting any form of trafficking in persons
- Procuring commercial sex acts
- Using forced, bonded, indentured, slave or involuntary prison labor
- Transporting, harboring, recruiting, transferring, providing or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services
- Holding or otherwise destroying, concealing, confiscating or denying access by employees to employees' identity or immigration documents
- Using fraudulent or misleading practices during recruitment or offering of employment
- Using employment recruiters who violate local labor laws of the country where the recruitment takes place
- Charging employees recruitment fees
- Subject to limited exceptions, failing to provide return transportation or pay for the costs of such transportation for certain employees brought into a country for the purpose of working on a particular contract
- Providing or arranging housing that fails to meet relevant standards for housing and safety
- Failing to provide to employees, prior to departure from their country of origin, a written work document containing certain specified information, including information regarding work and wages in a language the employee understands

### *Procedures to Ensure Compliance*

To promote compliance, NVIDIA human resources managers shall:

- Ensure that any employment recruitment company NVIDIA works with has trained employees
- Ensure employees are not charged recruitment fees
- Ensure that employee wages meet applicable legal requirements
- Discipline employment recruiters, including through termination, who charge a recruitment fee or otherwise violate standards for combatting trafficking in persons
- Ensure that housing arranged by NVIDIA meets applicable housing and safety standards
- Prevent NVIDIA agents and subcontractors from engaging in acts of trafficking in persons or related activities and monitor, detect and terminate any agents, subcontracts or subcontractor employees that have engaged in such activities

As appropriate, NVIDIA human resources managers – in coordination with the Ops Manager – shall ensure compliance with the prohibitions and procedures described above.

### *Awareness Outreach*

The Ops Manager shall make awareness outreach a key element of the Program. They shall inform employees and relevant third parties of prohibited activities and the actions that will be taken for violating this Policy.

### *Penalties*

Employees, subcontractors, or agents of NVIDIA who violate this Policy or related legal requirements shall be subject to disciplinary action, including, but not be limited to, removal from a team performing a U.S. federal government contract (or subcontract), reduction in benefits, or termination of employment or other relationship.

### *Reporting and Cooperation*

NVIDIA will immediately inform the appropriate federal contracting officer and inspector general of any credible information it receives from any source (including host-country law enforcement) alleging that a NVIDIA employee, subcontractor, subcontractor employee or agent of any of the foregoing has engaged in conduct that violates this Policy or related legal requirements. NVIDIA will also inform such persons of any actions taken against these persons pursuant to the information received.

To the extent required, NVIDIA will fully cooperate with any investigating agencies or agencies charged with enforcing compliance related to violations of the human trafficking legal requirements.

NVIDIA employees are required to report activity inconsistent with this Policy by contacting [NVIDIA-Compliance](#). To make an anonymous report, use the Speak-Up Lines and follow the directions under the "Report Code Violations" link. NVIDIA employees can also report such activity via the Global Human Trafficking Hotline at 1-844-888-FREE and its email address at [help@befree.org](mailto:help@befree.org). NVIDIA strictly prohibits retaliation against employees reporting activity inconsistent with this Policy.

A copy of this Combatting Trafficking in Persons Policy will be posted at all NVIDIA workplaces and on NVINFO.

If you have any questions concerning compliance with this Policy or NVIDIA government contracts themselves (including subcontracts), please contact [NVIDIA-Policies](#).