

COMBATTING TRAFFICKING IN PERSONS POLICY

Last updated: OCT 23, 2025

Purpose

NVIDIA is committed to the highest ethical and legal standards and prohibits all forms of human trafficking and related activities by Covered Persons (defined below) in its operations, supply chain, and any public sector activity. This Policy applies to all employees, temporary staff, contractors, agents, subcontractors, consultants, and business partners who perform work for or on behalf of NVIDIA under direct employment, partnership, or service agreement, regardless of where they work or how they are engaged ("Covered Persons"). This definition applies worldwide and covers individuals working on U.S. government contracts as required by law.

Policy Statement | Responsibilities

NVIDIA's Senior Manager of HR Operations oversees the design and implementation of this Policy.

Covered Persons will:

- Read and understand this Policy and complete required training; and
- Report, as described below, all concerns or questionable practices regarding human trafficking and cooperate with investigations regarding trafficking matters.

Managers and supervisors who are Covered Persons will:

- Ensure a workplace free from trafficking;
- Respond promptly to all complaints or reports; and
- Support and protect individuals who raise trafficking concerns.

Prohibited Activities. In accordance with U.S. Government policy, Covered Persons must never:

- Engage in or support any form of trafficking in persons;
- Procure commercial sex acts;
- Use forced, bonded, indentured, slave, or involuntary prison labor;
- Recruit, transport, harbor, transfer, provide or receive persons for labor or services through threat, force, coercion, fraud, or abduction;
- Withhold or otherwise destroy, conceal, confiscate, or deny access by employees to employees' identity or immigration documents;
- Use fraudulent or misleading practices during recruitment or employment offers;
- Use employment recruiters who violate local labor laws of the country where the recruitment takes place;
- Charge employee recruitment fees;
- Subject to limited exceptions, fail 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;
- Provide or arrange for unsafe or substandard housing; or
- Fail 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.

Recruitment and Employment Practices. To promote compliance with this Policy, NVIDIA Human Resources managers will:

- 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 or terminate employment recruiters 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; and
- Administer procedures to prevent agents and subcontractors from engaging in trafficking and to monitor, detect and terminate agents and subcontractors that engage in trafficking.

Awareness and Training. Anti-trafficking awareness and compliance training is required for Covered Persons.

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COMPLIANCE | VIOLATIONS and CONSEQUENCES

This Policy will be posted at all NVIDIA workplaces in the United States and on NVINFO.

Covered Persons who violate this Policy or related legal requirements will be subject to disciplinary action, including, but not 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.

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 Covered Person has engaged in conduct that violates this Policy or related legal requirements. NVIDIA will also inform such persons of any actions taken against Covered Persons pursuant to the information received.

NVIDIA will fully cooperate with agencies investigating or enforcing human trafficking laws as required.

Speak Up | Reporting Concerns

If you are aware of a potential violation of this Policy, report it to your manager or [NVIDIA-Compliance](#), or submit an anonymous report via NVIDIA's Speak Up system, EthicsPoint, at 1-866-295-3993 (U.S.) or [online](#). NVIDIA will take appropriate measures to maintain confidentiality and will not retaliate against anyone who reports a good faith concern or cooperates with an investigation. Covered Persons may also report such activity via the Global Human Trafficking Hotline at 1- 844-888-FREE or email help@befree.org.

Resources | Questions

If you have any questions about this Policy, or NVIDIA's government contracts (including subcontracts), please contact the [Employee Resource Center](#).