



# Our Code

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# A Letter From Jensen



At NVIDIA, the best and brightest can do their life's work and build a great life and family. We advance computing to tackle impactful challenges no other companies can and problems that are nearly impossible today. In doing so, we create future markets and a better tomorrow.

NVIDIA pioneers accelerated and AI computing, innovating across the entire stack, the whole data center, and from cloud to robotic systems. We build platforms for a rich ecosystem of developers and a network of partners to create new markets. We possess deep domain expertise to collaborate with researchers and innovators in the world's most important industries. NVIDIA's computing platform is open and easily accessible to every computer maker, researcher, and developer in every field of science and industry.

NVIDIA architecture, operating principles, and values are the foundations of our one-of-a-kind company. We believe in the following:

- ▶ First, taking care of our people. NVIDIA builds amazing things. This takes amazing people. Everything starts with great people.

- ▶ Second, extreme collaboration is needed across diverse skills and organizations to build full-stack, data center-scale products. Our company architecture demands cross-functional innovation and transparency—no one fails alone.
- ▶ Third, approach problems from first principles, limited only by laws of physics. We call this philosophy Speed-of-Light, and we apply it to every aspect of our work. It impacts everything from performance and cost to extreme operating efficiency, driving for “no waste” in everything we do, whether it is, yield, quality, design reuse, or One Architecture platform leverage.
- ▶ Finally, staying alert and agile. Technology and the world are changing fast. Alertness and agility are our ultimate superpowers.

We encourage all our employees to uphold and be inspired by our core values and to always follow and apply Our Code in their work. We prioritize advances that enhance environmental sustainability. We prioritize developing trustworthy AI to ensure this powerful technology provides benefits. We also recognize the importance of creating

a safe and inclusive environment. We value diversity and inclusion, which enables us to achieve this goal. Additionally, we recognize our responsibility to maintain high ethical standards and identify concerns through NVIDIA's Speak Up hotline. By upholding these principles, we demonstrate our corporate responsibility to each other, as well as our customers, partners, and the communities we serve.

Review Our Code to ensure that each of us upholds the principles that are essential for preserving NVIDIA's reputation as a distinguished and exceptional company.

Together, we can continue to demonstrate why NVIDIA is a technology company like no other, creating the conditions for our customers and partners to achieve breakthroughs that benefit society.

Thank you for being a part of the NVIDIA family.



Sincerely,  
**Jensen Huang**  
CEO and Founder, NVIDIA

# NVIDIA's Core Values



## Innovation

### **Dream big, start small. Take risks, learn fast.**

We make things that delight customers and raise industry standards. We encourage employees to innovate, guided by first principles, not consensus. We know our path to discovery will be paved with mistakes. We anticipate and avoid the ones we can. We accept, learn from, and share the ones that occur. This allows us to invent things the world doesn't even know it needs and, by doing so, invent the future.



## Excellence and Determination

### **Maintain the highest standards.**

We hire extraordinarily talented individuals across the globe—people determined to make a difference. We challenge ourselves to do our best work. We measure ourselves not against the competition, but against perfection—what we call the Speed-of-Light test. We aren't deterred by lengthy endeavors if they're worthy. We're playing a long game.



## Intellectual Honesty

### **Seek truth, learn from mistakes, share learnings.**

We operate at the highest ethical standards. We seek to accurately know ourselves and our capabilities—acknowledging our weaknesses and learning from our mistakes. The sharpest understanding of reality improves our work. Identifying the origins of mistakes is not about blame. It's essential to learning and constant improvement. We say what we believe and have the courage to act on it.



## One Team

### **Do what's best for the company.**

We foster an environment of transparency, openness, and sharing information. One that motivates our employees and empowers them to work as a single integrated team. We disagree openly and directly because conflict is essential to resolving differences, improving ideas, and achieving alignment. Our focus is on substance, not on style. By putting the interests of the company before our own, we can more easily accomplish NVIDIA's vision.



## Speed and Agility

### **Learn, adapt, shape the world.**

We're alert, constantly learning, and willing to adjust our course to align to new realities. This lets us create groundbreaking products at astonishing speed. No politics or hierarchy stands in the way of inventing the future.

# Our Expectations—Following Our Code

Every NVIDIA employee and board member is expected to read, understand, and comply with Our Code.

We expect all third parties we do business with—including consultants, contractors, and other service providers—to act with integrity and in a manner consistent with Our Code.

Our Code provides high-level guidance on our core values. It's impossible to spell out every ethical scenario we might face, so we rely on our good judgment and high professional standards to uphold and apply Our Code.

Along with the corporate guidelines and policies linked within Our Code, we adhere to all policies on NVINFO.

When we have questions about Our Code or wish to report a concern, it's our responsibility to speak up. Notify a manager or reach out to Human Resources or Legal. Send an email to **NVIDIA-Compliance**. Or report anonymously through the Speak Up site. All employees (and others subject to the Code) are protected from retaliation.

It's our responsibility to respond to inappropriate and unethical behavior. Failing to comply with Our Code, NVIDIA's policies, or applicable law

and regulations may lead to additional required training, disciplinary action, up to and including termination of employment or service.

## Training

We complete training on Our Code, trade compliance, and preventing workplace harassment upon hire and then every two years. Employees who have frequent contact with customers, partners, and suppliers complete additional global anti-bribery and anti-corruption training.

## Compliance Committee

NVIDIA's Board of Directors has formed a Compliance Committee to ensure ethics concerns are addressed appropriately.

## Waivers

Any waiver of Our Code requires written approval from the Compliance Committee. If the waiver involves a member of the board of directors or an executive officer, it will be disclosed in line with applicable rules or laws.





# Integrity and Fairness

## We hold ourselves to the highest standards at all times.

### We make ethical decisions.

- › When making decisions, we take the time to consider the implications of our actions regarding the law, Our Code, and other NVIDIA policies.
- › We ask ourselves what the impact would be if our conduct or action became public or came to the attention of respected colleagues.
- › When it comes to ethical conduct, we err on the side of caution. If we're unsure of what to do, we ask our manager, our human resources or legal department representative, or NVIDIA-Compliance.

### Managers serve as role models.

- › Managers at NVIDIA play a special role, promoting equitable and ethical decisions, and fostering safe working environments. Managers are expected to provide proper guidance to employees and are required to report or escalate suspected violations of Our Code or our policies promptly.



### When making ethical decisions, ask yourself:

1. Is it legal?
2. Is it consistent with Our Code, core values, and policies?
3. Could I defend my action if it became public on social media or came to the attention of respected colleagues?



Yes

I must be able to answer "yes" to these questions.



No



Do Not Proceed



### Ask for Advice

Contact your manager, HR, Legal, or Compliance

## We do not engage in bribery.

- › It's never acceptable to give, receive, or offer a bribe or anything of value (including cash, gifts, entertainment, or hospitality) for a corrupt or improper purpose, or for a third party to do so on our behalf.
- › Offering a bribe can lead to criminal sanctions and financial penalties against NVIDIA or its representatives.

- › We may also be held responsible for the acts of our partners, agents, and representatives.
- › We should be particularly cautious when interacting with government officials or others connected to a government and be aware of our business partners' affiliations with government officials.
- › When we accept or provide reasonable gifts, entertainment, or hospitality from and to third parties, we must seek preapprovals when required by our policies, and we kindly decline those that do not comply with our policies.
- › For questions, ask **NVIDIA-Compliance**.

Know our key policies and guidelines:

### Anti-Corruption Policy

### Gift, Entertainment, and Hospitality Policy

### Gift, Entertainment, and Hospitality

### Preapproval Process

### Conflict of Interest Policy

### Outside Activities-Conflict of Interest

### Preapproval Process



## We avoid conflicts of interest.

- › We make decisions in the best interests of NVIDIA.
- › We avoid situations where our actions might create a conflict—actual or potential—between our personal gain and our obligations to NVIDIA. If such conflicts arise, we immediately remove ourselves from any decision-making role in the matter.
- › We don't trade in derivatives of, short sell, or hedge NVIDIA's securities at any time, due to their potential to create a conflict of interest with NVIDIA's long-term objectives.
- › If involved in a situation that could present a perceived or actual conflict of interest, contact **Employment Legal** for guidance.

Know our key policies and guidelines:

### Conflict of Interest Policy

### Outside Activities-Conflict of Interest Preapproval Process

### The following types of activities may create a conflict of interest:

- › Advisory roles or board seat participation
- › Outside employment or consulting
- › Self-employment or volunteering (Inventions or app development, speaking or publishing opportunities, teaching or research at a university level or higher, game development)
- › Investments or personal relationships

### Outside Activities-Conflict of Interest Preapproval Process

## We do not limit competition.

- › We don't engage in activities that might limit competition or violate antitrust laws.
- › We gather competitive information with care, seeking only data that is publicly available or licensed to us.
- › We conduct our internal discussions, deliberations, and activities as if they were in public view.

Know our key policies and guidelines:

### Antitrust and Competition Guidelines

## We comply with laws governing international trade.

- › Our products, services, and technologies must comply with the import and export regulations of the U.S., as well as all other countries where they are made available.
- › Seek guidance from NVIDIA Global Trade to ensure that these transfers comply with applicable laws.

Know our key policies and guidelines:

### Trade Compliance Policy

## We meet our disclosure obligations.

- › We're committed to full, fair, accurate, timely, and clear disclosure in reports and documents that we file with or submit to government agencies, as well as in other public communications or in material that we develop for internal use.

Know our key policies and guidelines:

### Finance Team Code





## **We do not trade on or disclose non-public information.**

- › We don't trade stock or other securities of NVIDIA while we are aware of material, non-public information or, if applicable, outside of designated trading periods (unless under a 10b5-1 trading plan).
- › We don't trade stock or other securities of other companies while we are aware of non-public information about them, including information that we learn through our work with NVIDIA.
- › We don't discuss material, non-public information about NVIDIA with anyone inside or outside the company without a valid need to know.
- › We don't make recommendations to anyone regarding the buying, selling, or holding of NVIDIA stock.
- › We don't hold NVIDIA securities in a margin account or pledge NVIDIA securities.

Know our key policies and guidelines:

**Insider Trading Policy**

**Insider Trading FAQ**

**10b5-1 Trading Plan Guidelines**

## **We maintain accurate business records.**

- › We create business records that are complete, timely, understandable, and reflective of the truth of the underlying transaction or event. Always retain, protect, and dispose of such records according to policy.
- › We only sign documents and contracts that we are authorized to sign.
- › Email and other electronic communications may be business records. Avoid exaggeration, derogatory language, and other expressions that could be taken out of context or are in violation of company policy.

Know our key policies and guidelines:

**Authorization Matrix**

**Contract Policy**

**Business Travel and Expense Policy**

**Records Retention Policy**

**Finance Team Code**

**Finance Policies**



# Respect

## We treat all people inside and outside of the company with dignity and respect.

### We honor human rights.

- › 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 offer competitive wages and benefits worldwide, honor working hours and work weeks that comply with local laws, ensure safe working conditions, and expect contractors and vendors to treat their employees lawfully.
- › 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. We seek employee feedback regularly, and we value solicited and unsolicited suggestions as to how we can improve.

- › We respect the rights of others to have their views, whether we agree with them or not.

Know our key policies and guidelines:

#### **Human Rights Policy**

#### **Combatting Trafficking in Persons Policy**

### We treat each other with respect.

- › We foster an environment of mutual respect, honesty, and openness, where each employee is treated as a valued contributor.
- › We don't tolerate actions, words, or gestures that are abusive or harmful to others, are intimidating, or create an offensive or hostile work environment. This includes but is not limited to: offensive conduct; derogatory jokes or comments; microaggressions; remarks about personal choices, physical

characteristics, or appearance; unwanted sexual advances, invitations, or comments; untitling, addressing, or referring to a transgender or non-binary person by a name that they no longer use (also referred to as deadnaming), or addressing or referring to them by word or a pronoun that does not correctly reflect the gender with which they identify (also referred to as misgendering) after being asked not to do so.

- › This standard applies to our relations with customers, partners, co-workers, and fellow community members around the world.

Know our key policies and guidelines:

#### **Policy Prohibiting Discrimination, Harassment, and Retaliation**

“We dedicate ourselves to building a just, decent, and inclusive company. We must be empathetic to the experience of underrepresented groups and act to make NVIDIA a place of opportunities. We do this because it is right and just, and we believe it will help make NVIDIA better.”

**Jensen Huang**



## We promote diversity, inclusion, equity, and belonging.

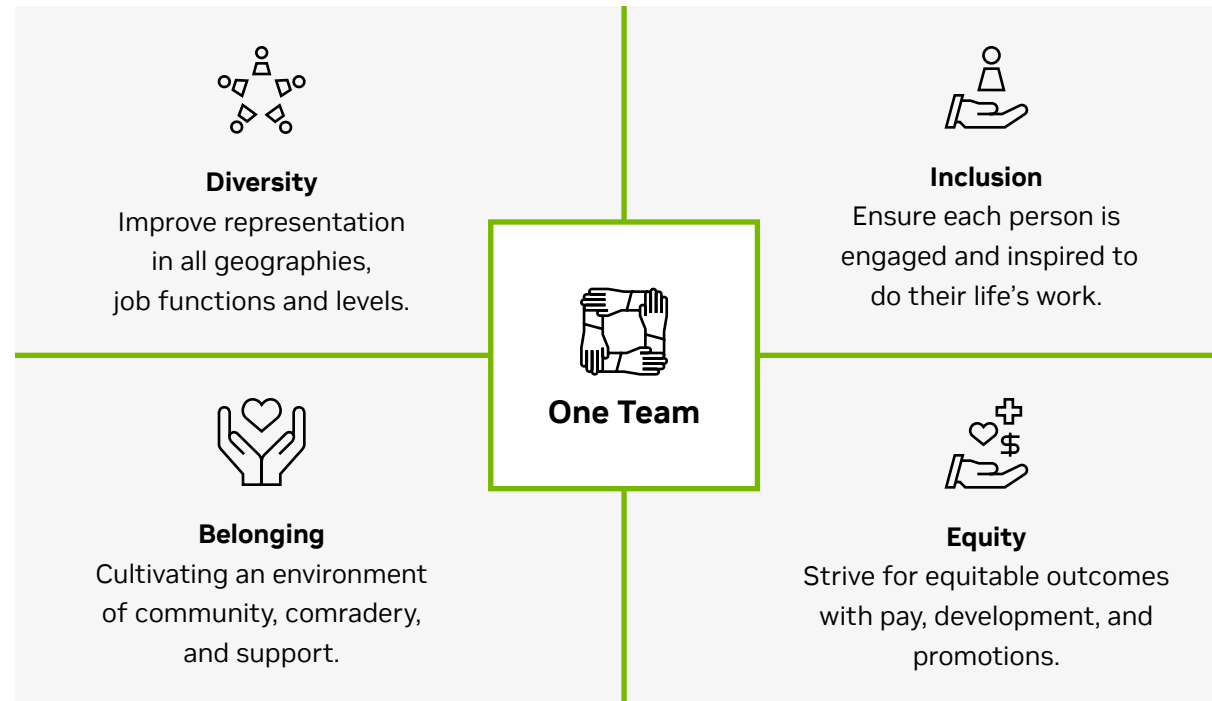
- › A diverse workforce results in diverse perspectives, which in turn stimulates creativity and innovation. **Everyone** is welcome here.
- › We treat each individual fairly and do not tolerate discrimination, harassment, or teasing.
- › Our perspectives on diversity extend beyond employees and potential employees to include how we treat our suppliers, partners, investors, customers, and fellow community members.

Know our key policies and guidelines:

### Equal Employment Opportunity Policy

### Policy Prohibiting Discrimination, Harassment, and Retaliation

### Gender Identity and Expression in the Workplace



## We create a safe, secure work environment.

- › We create a safe and secure workplace, in compliance with applicable environmental health, safety, and security laws and standards.
- › We foster a supportive environment where employees feel respected and protected when proposing ideas, asking questions, escalating concerns, or admitting mistakes.
- › Employees must follow established protocols, program requirements, regulations, and workplace practices, including instructions from environmental health and safety, security, and emergency response personnel.
- › We must not be under the influence of alcohol or drugs (including marijuana) while at work, and we may not bring drugs,

firearms, or other weapons onto NVIDIA premises or while conducting NVIDIA business.

- › Threats of any kind—including intimidation, stalking, or acts of violence—will not be tolerated.
- › We expect our suppliers and partners to comply with all applicable environmental health, safety, and security laws and standards in their operations.

Know our key policies and guidelines:

### Environment, Health, Safety, and Energy Policy

### Drug Free Workplace and Alcohol Use Policy

### Policy Prohibiting Discrimination, Harassment, and Retaliation

### Smoking Policy

# Passion for Our Products and Customers

## We delight our customers with our innovative products.

### We provide quality products and services.

- › We take pride not only in creating innovative products that transform our customers' experience for the better, but also doing so while maintaining transparency and integrity in our business relationships.
- › Our innovation enables NVIDIA to deliver value to our customers, our shareholders, and ourselves.
- › We support the use of our products for socially beneficial purposes and work to address the risks of potential harm.
- › We ensure our customers can trust our products by sharing important information about how they are built and work.
- › When it comes to artificial intelligence, we take a proactive approach to identify and address issues of trustworthiness concerns throughout the development

process—from data collection to decommissioning. When necessary, our AI Ethics Committee considers the implications of offering a product.

Know our key policies and guidelines:

#### **Quality Policy**

#### **Trustworthy AI**

### We market our products and services accurately.

- › We always position and market our products to maintain the value of our innovation.
- › We don't create misleading impressions in any advertising, marketing, or sales materials or presentations and don't make false or illegal claims about competitors or their offerings.
- › We protect the NVIDIA brand and its trademarks and only use them in accordance with our policy and with proper authorization.
- › For our artificial intelligence products, we use model cards to explain how a model was designed, trained, and tested, how it performs, and its intended purpose.

Know our key policies and guidelines:

#### **Copyrighted Material Policy**

#### **Trademark Clearance Policy**

### We foster long-term partnerships.

- › We enter into relationships committed to promoting our partners' interests, as well as our own.
- › We conduct ourselves and our business with the highest ethical standards by never taking undue advantage of a business relationship and never sacrificing a long-term relationship for a short-term gain.

### We comply with government contracting requirements.

- › We provide services and products to governments, which often impose rules that are different from—and more restrictive than—those that apply to purely commercial transactions.
- › We comply with these requirements and view doing business with governments as a special trust and responsibility.

- › We promptly contact our legal department if we receive an inquiry from a government official or agency. Legal will guide us in complying with government inspections, investigations, and requests.

Know our key policies and guidelines:

#### **U.S. Federal Government Contracting Guidelines**



# Trust

## We protect assets, data, and personal information, and put the company's interests ahead of our own.

### We safeguard NVIDIA assets.

- › NVIDIA's assets should be used only for ethical and legal purposes that benefit the company and its shareholders, and should not be used to engage in outside commercial activities or illegal activities, or to create, store, or send content that others might find offensive.
- › Spend NVIDIA's capital only in accordance with applicable policy.
- › Keep personal use of NVIDIA's assets to a minimum and avoid any use that might lead to loss or damage, including the introduction of viruses or a breach of IT security.
- › We're responsible for all NVIDIA's assets and intellectual property entrusted to us. We take care to prevent the loss, theft, unauthorized selling or reselling, and misuse of NVIDIA assets, IP, or documents. We must

return all such assets, intellectual property, and documents immediately upon request or upon termination of employment.

Know our key policies and guidelines:

**Corporate Purchasing Policy**

**NVIDIA Team Privacy Notice**

**Information Security Policy**

**Third Party LLMs Including ChatGPT Use Guidelines**

### We uphold confidentiality.

- › We protect confidential or proprietary information whether it belongs to NVIDIA or to others.
- › We keep documents, emails, and other information confidential and only disseminate them outside of NVIDIA when required for business reasons and with appropriate confidentiality agreements.
- › When we choose to release information, we must ensure that we do so through the right channels and in a manner that properly protects NVIDIA and any confidential information, regardless of its owner.

Know our key policies and guidelines:

**NVIDIA Team Privacy Notice**

**Confidential Information Policy**

**Information Security Policy**

### We respect privacy and protect personal information.

- › We protect the personal information of current and former employees, members of our Board of Directors, customers, job applicants, online users, business partners, and suppliers.
- › We obtain and use personal information solely for legitimate business purposes in accordance with applicable privacy policies, and we don't collect personal data that we don't need.
- › We never share this information with a third party or any colleague who doesn't have a need to know.

Know our key policies and guidelines:

**NVIDIA Team Privacy Notice**

**Information Security Policy**

### How to protect NVIDIA and third-party confidential information:

- › Avoid leaving confidential information where unauthorized individuals can access.
- › Limit disclosure to those who need to know.
- › Secure or destroy confidential information per our Information Security Policy.
- › Report any suspected breaches to Security.
- › Obtain NDAs or other contractual protections when working with third parties.
- › Stamp materials "NVIDIA Confidential" before sharing with third parties.



### We respect intellectual property.

- › We respect the intellectual property of others, just as we expect others to respect our intellectual property.
- › We use patents and copyrighted material belonging to others only after obtaining the proper licenses and permissions.
- › We cite others' trademarks in accordance with the owners' guidelines.
- › We don't use NVIDIA networks, computers, or other resources to acquire, share, or store copyrighted material that isn't properly licensed.
- › We treat the proprietary information of our business partners as confidential, and we protect it just as we do our own.

Know our key policies and guidelines:

**Confidential Information Policy**

**Copyrighted Material Policy**

**Trademark Clearance Policy**

**Use of Third-Party Proprietary Source and Open-Source Policy**

### We communicate responsibly with external parties.

- › Except for authorized spokespersons (our CEO, CFO, Investor Relations personnel, and certain other individuals as described in our policy), we may not communicate on behalf of NVIDIA or about NVIDIA's business to the press, analysts, the financial community, investment research firms, or shareholders, or in public forums.
- › Refer any questions from investors or financial analysts to our **Investor Relations** department and any questions from the press or other media outlets to our Corporate Communications department.
- › We don't share or post confidential company information externally, unless approved by our Corporate Communications department.

Know our key policies and guidelines:

**Shareholder and Analyst Communications Policy**

**Social Media Policy**

**Insider Trading Policy**

**Insider Trading FAQ**

### We engage in responsible travel and entertainment.

- › NVIDIA recognizes that gifts, entertainment, and hospitality can be used to lawfully and appropriately promote positive business relations.
- › We operate ethically and transparently, and do not use gifts, entertainment, or hospitality to improperly influence business decisions.
- › We politely decline or return gifts and entertainment that do not comply with our company policies.
- › When we travel for approved business purposes, we will be reimbursed for reasonable and appropriate travel and entertainment expenses that are permitted by our company policies, and supported by accurate and complete documentation of our expenses.
- › We strive to minimize expenses while maintaining integrity, productivity, and safety.

Know our key policies and guidelines:

**Business Travel and Expense Policy**

**Gift, Entertainment, and Hospitality Policy**



# Corporate Responsibility

## We are an asset to every community where we do business.

### We source products and select suppliers carefully.

- › Our commitments to our customers and partners extend to our supply chain.
- › We are Full members of the Responsible Business Alliance (RBA), and we have adopted the RBA Code of Conduct.
- › We require our suppliers to comply with the RBA Code of Conduct, as NVIDIA's supply chain code of conduct, and to align with other internationally recognized standards related to social and environmental responsibility.

Know our key policies and guidelines:

#### Corporate Responsibility Directive

## We conserve the environment.

- › We strive to reduce the climate and environmental impacts of our activities by designing energy-efficient technology and working with our suppliers and partners engaged in manufacturing to create our products in an environmentally responsible manner.
- › In our activities, we aim to use environmentally sustainable products and services, minimize waste, reduce greenhouse gas emissions, and prevent pollution.
- › We operate in full compliance with applicable environmental legislation, and we expect our suppliers and partners to do the same.

Know our key policies and guidelines:

#### Environment, Health, Safety, and Energy Policy

#### Corporate Responsibility Directive

## We strive to improve our communities.

- › We work with and contribute to charitable and community organizations.
- › We encourage our employees to engage in community organizations and charities as their conscience and desires dictate. Unless volunteering as part of a company-organized event, we ensure that we do not give the impression that we represent or are acting on behalf of NVIDIA; we do not use NVIDIA assets or resources, nor do we engage in these activities during work time.

Know our key policies and guidelines:

#### Corporate Responsibility Directive

## NVIDIA alone represents the company's rights in the political process.

- › We have the right and are encouraged to pursue personal interests such as active participation in the political process in our communities, as individuals and not as NVIDIA representatives.
- › We ensure that our individual political views and activities are not viewed as those of NVIDIA. We don't engage in individual political activities during work time or use NVIDIA facilities, intellectual property, or assets.
- › NVIDIA only seeks to affect government action on issues that directly impact our business and only through specifically authorized and legally compliant lobbying activities.

Know our key policies and guidelines:

#### Political Contributions and Expenditures



# Reporting Concerns

## We speak up if we believe someone is behaving illegally or unethically.

### We must act when we are aware of misconduct.

- › We must report our concerns or suspected violations of Our Code or our policies to a resource that we are most comfortable using, such as a manager, a human resources or legal representative, or NVIDIA-Compliance. Each will respond and promptly elevate it by emailing NVIDIA-Compliance.
- › We can make an anonymous complaint by calling NVIDIA's external Speak Up line, or by submitting a complaint via this [online portal](#).
- › It is a violation of Our Code to knowingly make a false accusation.

## We promptly investigate reports of misconduct.

- › The Compliance Committee and its delegates investigate reports of suspected violations of Our Code promptly, thoroughly, and in accordance with our legal obligations.
- › Confidentiality, including the identity of the parties and witnesses, is maintained to the fullest extent possible, except as necessary to conduct the investigation.
- › After reviewing all of the available information, we may determine that remedial action (such as additional training, enhanced controls or changed protocol, or coaching) or disciplinary action (including termination of employment) is necessary.
- › Remedial action taken will be appropriate under the circumstances to prevent and correct behavior; details of such actions are generally not disclosed to reporters or witnesses.

## We cooperate with investigations.

- › Unless otherwise provided by law, we're required to cooperate with internal and external investigations and to provide complete, accurate, and truthful information.
- › Our Legal department responds to litigation or requests from governmental or other external agencies.
- › We never alter, destroy, or delete records in response to anticipated or actual litigation, investigations, or audits.
- › To preserve the integrity of an investigation, we should not discuss aspects of the investigation with anyone, including the reporter, implicated party, or potential witnesses, during the pendency of the investigation.

Know our key policies and guidelines:

### Records Retention Policy

## How to raise a concern

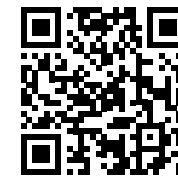
### Voice your concern—Speak Up

You're protected when reporting a concern.

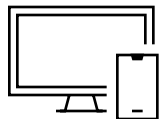
Reporting options:

- › Your manager or HR
- › NVIDIA Legal team
- › NVIDIA-Compliance
- › EthicsPoint Speak Up

### EthicsPoint Speak Up



[Global Mobile Access](#)



[Report Online](#)



[Report by Phone](#)



## When do we speak up?

These are a few examples of when we should seek guidance and report concerns when we are aware of misconduct:

- › You suspect or are aware of a violation to Our Code or our policies.
- › Laws have been violated or a crime has been committed.
- › You are aware of a bribe or potential bribe.
- › The situation involves harm to property, the environment, or to the health and safety of individuals.
- › An investigation has been compromised.
- › You are aware of retaliation.

## NVIDIA does not tolerate retaliation.

- › NVIDIA doesn't tolerate retaliation against anyone who, in good faith, reports a concern or cooperates with an investigation, even when allegations are found to be unsubstantiated.
- › Depending on the particular allegations, the identity of a reporter or respondent may be apparent to others (including witnesses interviewed in connection with an investigation). Reporters and respondents should not be approached regarding investigations. Even where intentions are good, this may make a person feel uncomfortable.
- › Where a reporter's (or respondent's) identity is not apparent, we should not speculate about, or attempt to identify, such individuals.



## What happens when you speak up?

### Our investigation process

#### 1. Intake | Speak Up

- › You're protected when reporting a concern.
- › Report to your manager, the Employee Resource Center, Legal, NVIDIA-Compliance, or EthicsPoint Speak Up.
- › In most cases, you may choose to remain anonymous.

#### 2. Assess | Assign

- › Compliance team assesses the allegation.
- › It determines if there's a potential policy violation.
- › It assigns an investigator.
- › All matters are carefully considered and handled discreetly.

#### 3. Investigate | No Retaliation

- › Review documentation.
- › Interview witnesses, who are equally protected.
- › Finalize report, including conclusion and recommendations.

#### 4. Completion | Resolution

- › Gain necessary approvals.
- › Carry out recommended actions.
- › Follow up with investigation participants.
- › Close investigation.

Please see **NVIDIA's Corporate Policy repository** to review the additional global and country specific policies that apply to your work location.

