

NVIDIA Corp.

TICKER

NasdaqGS:NVDA

MARKET CAPITALIZATION

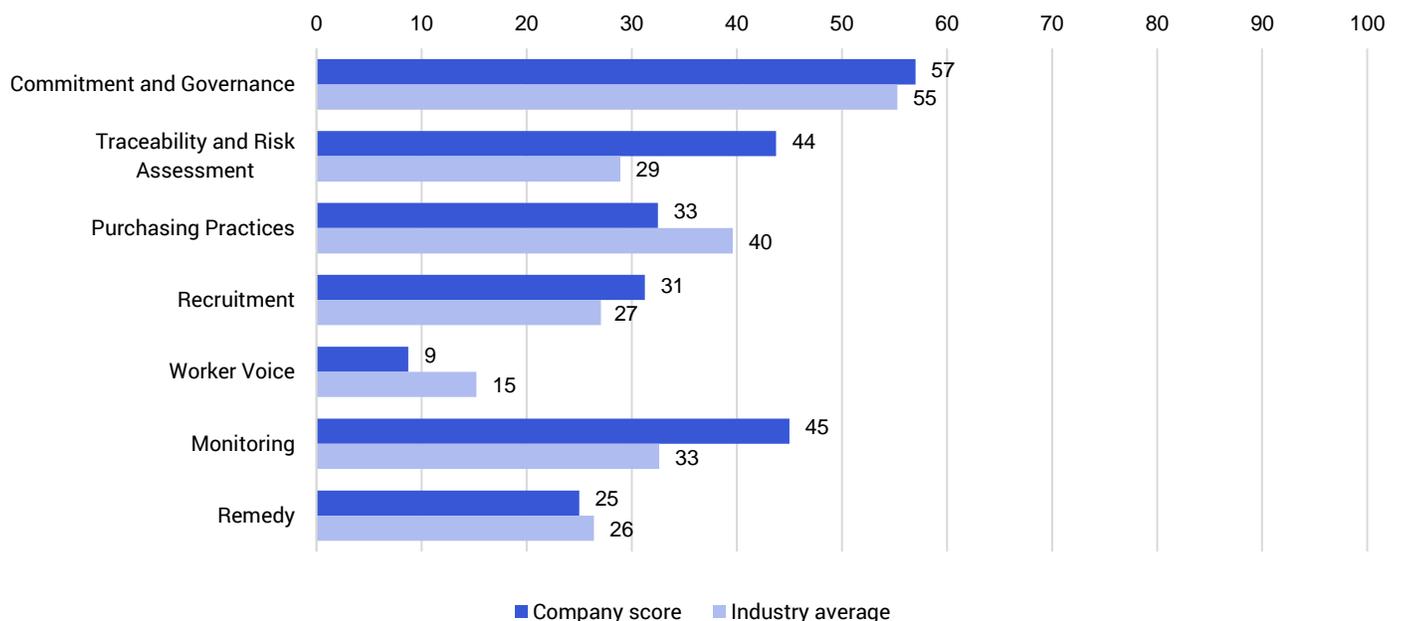
US\$149 billion

HEADQUARTERS

United States

COMPLIANCE
UK Modern Slavery Act: [Disclosure available, but not compliant](#)
California Transparency in Supply Chains Act: [None available](#)
COMMITMENTS
[None](#)
OVERALL RANKING
17 out of 40
OVERALL SCORE
35 out of 100
SUMMARY

NVIDIA Corp. (NVIDIA), a semiconductor company supplying to companies such as Hewlett Packard Enterprise, HP, and Microsoft, ranks 17th out of 40 companies. It discloses about the same amount of information on its forced labor policies and practices as its peers. Additional steps the company could take to address forced labor risks in its supply chains include strengthening its disclosure and practices on the themes of purchasing practices, recruitment, and worker voice.

THEME LEVEL SCORES


LEADING PRACTICES

None

NOTABLE FINDINGS

Commitment and Governance: NVIDIA discloses that it has a program to combat people human trafficking, for which the Senior Manager of HR Operations is responsible. The company states that all employees are required to complete training on its Code of Conduct (which includes reference to forced labor). It discloses that 'relevant employees took several RBA [Responsible Business Alliance] Learning Academy courses', and that it assigned RBA Learning Academy courses to its suppliers, including those on forced labor, hiring and working with migrant workers, working hours, and wages. NVIDIA also discloses that it is a full member of the RBA.

Traceability and Risk Assessment: NVIDIA discloses some information on its suppliers, noting that its manufacturers of semiconductor wafers are Taiwan Semiconductor Manufacturing Company and Samsung and that its two main contract manufacturers are Foxconn and BYD. The company discloses a list of its smelters and refiners of 3TG (tin, tungsten, tantalum, gold), as well as the countries of origin of 3TG in its supply chains. In addition, NVIDIA states that it has integrated RBA risk assessment tools into its supplier management practices, and that it has conducted a risk assessment on its strategic suppliers.

Monitoring: NVIDIA states that it has "reviewed eight VAP [Validated Audit Process of the RBA] audits of strategic suppliers" and that its "two main contract manufacturers completed VAP or customer-managed audits". The VAP includes a review of relevant documents, such as working hour records and payroll, formal and informal interviews with workers which are conducted privately, and visits to production facilities and related worker housing. NVIDIA states that one of the common findings of their audits included non-compliance with working hour standards.

OPPORTUNITIES FOR IMPROVEMENT

Purchasing Practices: To enable the company to enforce its expectations with its suppliers, the company may consider integrating its supply chain standards addressing forced labor and human trafficking into contracts with its suppliers. Further, the company is encouraged to assess risks of forced labor at potential suppliers before entering into contracts with them.

Recruitment: The company may consider requiring employment recruitment agencies — and where relevant employment agencies — in its supply chains to uphold workers' fundamental rights and freedoms, and to disclose information on the recruitment agencies used by its suppliers. To avoid the exploitation of migrant workers in its supply chains, the company is encouraged to ensure that employment and/or recruitment agencies used in its supply chains are monitored, and to provide details of how it supports ethical recruitment in its supply chains (for example, by using ethical recruitment agencies or supporting the development of ethical recruitment schemes).

Worker Voice: To prevent and address forced labor and human trafficking risks in its supply chains, the company is encouraged to take steps to ensure that workers in its supply chains are educated on their rights and can exercise their right to freedom of association. Further, the company may consider ensuring that the grievance mechanisms it requires its suppliers to have in place are effective (i.e. are communicated to, trusted and used by suppliers' workers).

COMPANY PROVIDED ADDITIONAL DISCLOSURE

[Yes](#)