

# NVIDIA Corp.

**TICKER**  
NAS:NVDA

**MARKET CAPITALIZATION**  
US\$149 billion

**HEADQUARTERS**  
United States

**DISCLOSURES**  
UK Modern Slavery Act: Yes

**TARGETS**  
Yes

California Transparency in Supply Chains Act: Not applicable

## OVERALL RANKING

**20 out of 49**

([2018 Rank](#): 17 out of 40)

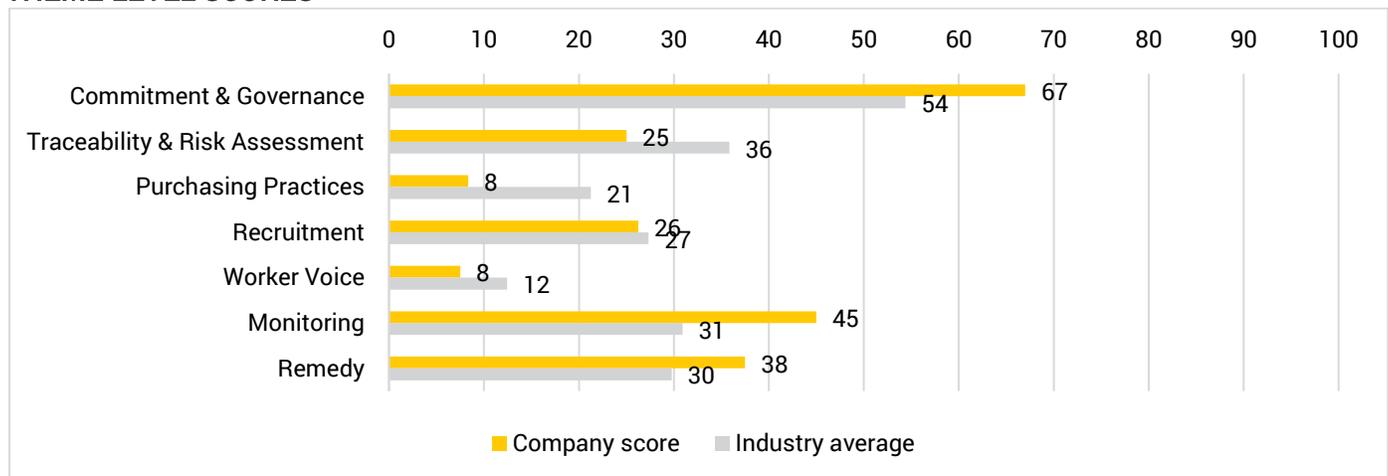
## OVERALL SCORE

**31 out of 100**

## SUMMARY

NVIDIA Corp. (NVIDIA), a supplier to companies including HP and Microsoft, ranks 20<sup>th</sup> out of 49 companies, disclosing about the same amount of information on its forced labor policies and practices as its peers. Compared to 2018, the company's rank decreased from 17<sup>th</sup> to 20<sup>th</sup>. This is because the company seems to have taken limited steps to strengthen its performance and disclosure, namely making its supplier code available from its website and disclosing an example of a corrective action process in practice. The company's score is based on its good performance on the themes of Commitment & Governance and Monitoring. The company is encouraged to improve its performance and disclosure on Traceability & Risk Assessment, Purchasing Practices, and Worker Voice.

## THEME-LEVEL SCORES



Research conducted through October 2019 or through January 2020, where companies provided additional disclosure or links. For more information, see the full dataset [here](#). For information on a company's positive and negative human rights impact, see the Business & Human Rights Resource Centre [website](#).

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**KEY DATA POINTS****SUPPLIER LIST**

No

**AVERAGE SUPPLIER SCORE**

43/100

**HIGH-RISK SOURCING COUNTRIES**China<sup>1</sup>**NO-FEE POLICY**

Yes (Employer Pays Principle)

**REMEDY FOR SUPPLY CHAINS WORKERS**

No

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**LEADING PRACTICES**

None.

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**NOTABLE FINDINGS**

**Commitment & Governance:** NVIDIA discloses that it uses version 6 of the Responsible Business Alliance code of conduct (which prohibits forced labor) as its supplier code of conduct. This includes a requirement to cascade the code's standards to the next tier of suppliers. The company also discloses that, as of April 2019, almost 99% of its employees had received training on its policies, which include forced labor and human trafficking.

**Recruitment:** NVIDIA's supplier code prohibits worker-paid recruitment fees and states that fees shall be reimbursed to suppliers where discovered. The code also prohibits the retention of workers' documentation, including passports.

**Monitoring:** The company discloses that it uses the RBA's Validated Assessment Program for supplier audits, which includes a review of relevant documents (such as working hour records, payroll, deductions, and benefits), worker interviews in the local language, and visits to associated facilities, including worker accommodations.

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**OPPORTUNITIES FOR IMPROVEMENT**

**Traceability & Risk Assessment:** The company is encouraged to assess and disclose forced labor and human trafficking risks in different tiers of its supply chains. The company may further consider disclosing the names and addresses of its first-tier suppliers, the countries in which its below-first-tier suppliers operate, the countries from which it sources raw materials at high risk of forced labor, and several data points on its suppliers' workforce.

**Purchasing Practices:** The company is encouraged to assess the risks of forced labor at potential suppliers before entering into contracts with them and to disclose the outcomes of this process. To enforce its expectations with its existing suppliers, the company may consider integrating its supply chain policies addressing forced labor and human trafficking into contracts with its suppliers and requiring suppliers to do the same.

**Worker Voice:** To support collective worker empowerment, the company is encouraged to work with local or global trade unions to support freedom of association in its supply chains. Where there are regulatory constraints on freedom of association, the company may consider ensuring workplace environments in which workers in its supply chains are able to pursue alternative forms of organizing. Further, the company is encouraged to disclose examples covering different supply chain contexts of how it improved freedom of association and/or collective bargaining for its suppliers' workers, such as migrant workers.

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**ENGAGED WITH KNOWTHECHAIN**

Yes ([Provided Additional Disclosure](#)).

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<sup>1</sup> The US Department of Labor lists China as a country where electronics may be produced using forced labor. US Department of Labor (20 September 2018), "[List of Goods Produced by Child Labor or Forced Labor](#)."