POLITICAL CONTRIBUTIONS AND EXPENDITURES POLICY

Last Updated: JUN 22, 2023

Policy Purpose | Applicability

NVIDIA engages in the public policy process to advance the long-term interests of the company and shareholders. NVIDIA Government Relations is responsible for managing NVIDIA’s public policy priorities and communication with governments worldwide. When participating in particular public policy discussions, NVIDIA Government Relations pursues the objectives of global consistency and local relevancy and evaluates the impact on NVIDIA’s growth and business operations. Any contributions or expenditures will promote the interests of NVIDIA and will be made without regard for the private political preferences of executives.

NVIDIA is committed to strong management, oversight and transparency when reporting the company’s engagement with government officials at all levels, and we consistently seek to provide our shareholders with information regarding public policy engagement.

This Policy applies in all countries and across all levels of government, even where such contributions are permitted by law.

Policy Statement | Responsibilities

Political Contributions

To date, NVIDIA has not made contributions of any kind (money, employee time, goods or services, or employee expense reimbursements), to political parties or candidates, including any direct contributions through any intermediary organizations, such as political action committees (PACs) or lobbyists, campaign funds, or trade or industry associations, or super PACs.

In the future, if NVIDIA makes any political contributions, NVIDIA will publicly disclose such expenditures on its website and disclosure reports semiannually.

Public Policy Expenditures and Lobbying

NVIDIA may make expenditures to support or educate particular viewpoints on public policy issues, including expenditures for intermediaries that advocate on NVIDIA’s behalf. This may include engaging with government staff and officials to provide thought leadership on public policy issues that impact our business or our employees. In addition, NVIDIA may seek the participation of NVIDIA employees in conveying their expertise and NVIDIA’s positions to public officials.

NVIDIA educates public leaders on issues of importance to its business, customers, shareholders and employees. NVIDIA only seeks to affect government action on issues that affect our business, customers, shareholders or employees and only through specifically authorized and legally compliant lobbying activities. All NVIDIA lobbying activities require the prior approval of NVIDIA Government Relations and Legal. Where required by law, NVIDIA files lobbying disclosure reports with state governments.

In 2022, NVIDIA made no independent expenditures related to political campaign initiatives and referenda meant to influence the outcome of ballot measures and had no reportable lobbying expenditures.

Trade and Industry Associations

NVIDIA belongs to a number of trade associations worldwide, representing the interests of the technology industry, of industries in which NVIDIA operates and of the broader business community. These organizations work to bring about industry consensus and advocacy on major public policy issues. NVIDIA’s participation in trade associations, including membership on a trade association board, does not mean that the company agrees with every position a trade association takes on an issue. Indeed, from time to time NVIDIA public policy positions may differ from those of the trade association of which we are members. Furthermore, NVIDIA instructs trade and industry associations that no NVIDIA funds may be used for political expenditures.
For 2022, in the United States, the principal trade associations in which NVIDIA held membership were as follows:

- Information Technology and Innovation Council
- ORAN Alliance
- National Venture Capital Association
- Semiconductor Industry Association

NVIDIA does not hold a membership in any 501(c)(4) organizations.

**Employee Public Service and Political Activity**

NVIDIA’s employees have the right and are encouraged to pursue personal interests, including active participation in the political process in their communities. If NVIDIA employees choose to participate in political activity, they do so as individuals and not company representatives. NVIDIA employees who voluntarily participate in campaign activities must do so on their own time, or by taking paid time off or an unpaid leave of absence. In situations where our employees wish to enter public service, the company has policies in place to avoid conflicts of interest.

**COMPLIANCE AND OVERSIGHT**

Public policy advocacy involving expenditures, political contributions or the participation of NVIDIA employees and all NVIDIA lobbying activities require the prior approval of NVIDIA Government Relations and Legal, including NVIDIA’s Vice President of External Affairs and General Counsel.

NVIDIA’s Nominating and Corporate Governance Committee (NCGC) has oversight over policies and practices in connection with governmental relations, public policy and related expenditures. NVIDIA’s management periodically reports to the NCGC on such policies, practices, and activities.

**Speak Up | Reporting Concerns**

If you are aware of a situation that may violate this Policy, you have a responsibility to report the incident to your immediate supervisor, Human Resources, or to NVIDIA-Compliance. Reports may also be submitted anonymously by using NVIDIA’s Speak Up system through EthicsPoint at 1-866-295-3993 (for the U.S.) or via the web here. When reporting a concern, we encourage you to consider revealing your identity so that we can properly follow up and investigate alleged violations. NVIDIA will ensure that appropriate confidentiality measures are taken and will not retaliate against anyone, who in good faith, reports a concern or cooperates with an investigation, even when allegations are found to be unsubstantiated.