



## FINANCE TEAM CODE

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*Last Updated: JUN 22, 2023*

This Finance Team Code sets forth principles adopted by NVIDIA to create the highest level of confidence in its accounting policies, financial reporting, underlying systems of internal controls, and its finance organization employees. Our board of directors, members of our executive staff, all members of our finance organization worldwide, and all employees involved in the preparation and review of externally-reported periodic financial reports, filings and documents of NVIDIA (collectively, the "Finance Team") are expected to abide by this Finance Team Code. In addition to complying with this Finance Team Code, the Finance Team, like all NVIDIA employees, must also conduct NVIDIA business in accordance with the principles set forth in Our Code. While it is not feasible to list all acceptable and unacceptable actions, the following set forth NVIDIA's position in several important areas.

### **As a member of our Finance Team, you must:**

- Act honestly, ethically and fairly, avoiding actual or apparent conflicts of interest. If there is even the potential for conflict or ambiguity between what is and is not permitted, the conduct in question must be avoided;
- Act in compliance with all applicable governmental laws, rules and regulations in each jurisdiction to which NVIDIA is subject;
- Act in good faith with integrity, and without misrepresenting or failing to disclose material facts known to you with respect to your financial duties to NVIDIA;
- Communicate information in a clear manner that ensures full, fair, accurate, timely and understandable disclosure in all reports and documents that NVIDIA files with, or submits to, government agencies and in other public communications or develops for internal use;
- Ensure that material information required to be disclosed by NVIDIA in the reports that it files or submits pursuant to applicable law is recorded, processed, summarized and reported, within the time periods specified in applicable law;
- Review transactions for a broad spectrum of risks and bring in subject matter experts when needed;
- Maintain records that accurately and fairly reflect the transactions and dispositions of NVIDIA assets and assure that transactions are recorded as necessary to permit preparation of financial statements in accordance with generally accepted accounting principles;
- Ensure that NVIDIA's approved business processes, financial policies and internal controls related to financial reporting are followed by NVIDIA personnel and NVIDIA-retained consultants, including a duty to report any perceived deficiencies in or suspected violations of the same;
- Take appropriate measures to safeguard the assets and resources employed by or entrusted to NVIDIA from misappropriation, embezzlement or impairment and to properly validate any disbursements of cash or transfers of such assets prior to any disbursement or transfer. This includes protecting NVIDIA's physical and intangible assets from theft or misuse by ensuring NVIDIA's systems and processes have the appropriate controls to protect NVIDIA's data, and physical and intellectual property;
- NOT directly or indirectly, make or cause to be made, a materially false or misleading statement regarding business processes, financial policies and internal controls related to financial reporting;
- NOT omit material facts or make misleading statements in connection with an audit of NVIDIA's financial statements or the preparation or filing of any document to be filed with the SEC or any other similar regulatory entity worldwide;
- NOT directly or indirectly take any action to fraudulently influence, coerce, manipulate, or mislead any independent



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registered public accounting firm engaged in the performance of an audit or review of the financial statements of NVIDIA that are required to be filed with the SEC or any other similar regulatory entity worldwide if that person knew, or was unreasonable in not knowing, that such action could result in rendering such financial statements materially misleading;

- NOT trade stock or other securities of NVIDIA while you are aware of material, non-public information or otherwise use confidential information acquired in the course of your work for personal advantage;
- NOT disclose material, non-public information with anyone inside or outside NVIDIA without a valid need to know;
- NOT speak to the financial community (including analysts and shareholders) on behalf of NVIDIA unless you are authorized to do so, including under our Shareholder & Analyst Communications Policy.

### COMPLIANCE | VIOLATIONS and CONSEQUENCES:

It is NVIDIA's intention that this Finance Team Code be its written code of ethics under Section 406 of the Sarbanes-Oxley Act of 2002 complying with the standards set forth in SEC Regulation S-K Item 406.

Violations of this Code may result in corrective or disciplinary action, up to and including termination of employment.

### Speak Up | Reporting Concerns

If a member of our Finance Team becomes aware of any suspected or known violations of this Finance Team Code, he or she has a duty to promptly report such concerns, anonymously or not, either to his or her manager or local human resource representative or through our confidential, third-party reporting platform, 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. All reports will be reviewed and subject to internal investigation by the Compliance Committee or the Audit Committee. 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.

### Resources | Questions

If you have any questions about any aspect of this Finance Team Code, you are encouraged to contact the Corporate Legal Group.

> [Our Code](#)