

# Qualcomm

## The Qualcomm Way

**Our Code of Business Conduct**

2020 Edition





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# Letter from Our CEO

At Qualcomm, our commitment to purposeful innovation, passionate execution, collaborative community, and unquestioned integrity underpins everything we do. Through more than three decades of innovation, we have continued to create technologies that revolutionize the way people live, work, and connect. But it's how we make this all possible that defines us... that's **The Qualcomm Way**.

We bring **The Qualcomm Way** to life through our culture of invention, our ability to meet every challenge and persevere, and the passion and dedication of our employees. Along the way, as we meet ethical challenges, our Code of Business Conduct serves as a guide, helping us build integrity into everything we do as a company.

Please read and become familiar with the Code. We are all responsible for helping ensure that everyone at Qualcomm does the right thing – always. Our Open Door Philosophy encourages employees to raise any work-related concerns without fear of retaliation. If you have questions or concerns about conduct that you don't think aligns with our values or guidance, reach out to your manager, Human Resources, the Office of Compliance, Legal, our Business Conduct Hotline, or any member of leadership.

Thank you for bringing your talents, energy, and commitment to Qualcomm, and for working together to ensure we always do business **The Qualcomm Way**.

Sincerely,  
**Steve Mollenkopf**  
CEO, Qualcomm





# Qualcomm Values



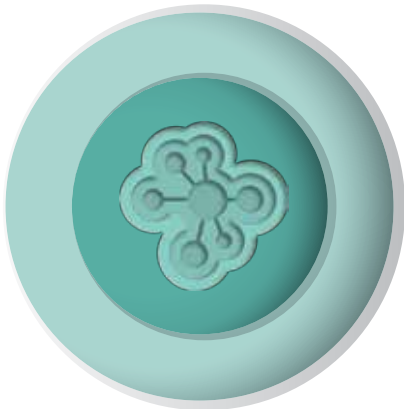
## Purposeful Innovation

- Raise the Bar
- Drive Technology Leadership
- Focus on the Customer
- Engage Curiosity



## Passionate Execution

- Ensure Total Quality
- Make Decisions Efficiently
- Exceed Expectations
- Empower People



## Collaborative Community

- Foster Inclusion & Diversity
- Communicate Openly
- Leverage Expertise
- Be Respectful



## Unquestioned Integrity

- Do the Right Thing
- Take Ownership
- Cultivate Trust
- Embrace Social Responsibility





# The Way Our Code Guides Us

Adhering to our Code means more than just reading it. More than just knowing it. It means living it and being a champion for the values that it represents.

Our core values – the fundamental building blocks of our business success – are embedded throughout the guidelines presented in the Code. As we learn more about The Qualcomm Way, we find that each of us is vital to upholding and demonstrating our values in all we do.

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# Purpose of Our Code

Our Code helps us navigate the ethical and legal situations we each face daily and sets forth expected behaviors. We believe ethical conduct is a culture imperative and strive to follow the letter and the spirit of our Code, understanding it in the context of our core Company values:

Purposeful Innovation  
Unquestioned Integrity

Passionate Execution  
Collaborative Community

Although it cannot address every business or ethical dilemma we may encounter, the Code can guide us in making sound decisions so that we can act with integrity in all that we do. It includes information about:

- Company policies
- Laws and regulations we must know and follow
- Standards for ethical conduct
- Resources for questions or concerns

Violations of our Code, Company policies, laws, or regulations may carry serious consequences including disciplinary action and possible termination. In some situations, the individuals involved and/or our Company may face civil and/or criminal liability for violations.

As changes in our organization and business operations occur, we will reassess and clarify our practices, policies, and procedures. Visit our Code website for the most up-to-date information, including links to policies, procedures, guidance, resources, and contact information.

## Additional Details:

→ [Code of Business Conduct website](https://go/cobc) (go/cobc)







# Who Follows the Code

## Qualcommers

All of us are expected to behave The Qualcomm Way – living and upholding our values every day.

Because Qualcomm operates in many countries, it's important to be aware of the different laws, regulations, and business and cultural customs that may apply to our business activities. While we respect the norms of our customers, business partners, and co-workers throughout the world, all employees must, at a minimum, comply with the standards in this Code unless they are inconsistent with local law. In this case you should seek guidance from the Legal Department or email [cobc@qualcomm.com](mailto:cobc@qualcomm.com).

## Managers

Qualcomm managers have additional responsibilities:

- Lead by example, serving as role models, and by communicating support for our values and the principles reflected in the Code.
- Embrace and encourage our Open Door Philosophy so employees feel comfortable asking questions and raising concerns.
- Set objectives that are clear, align with our Company values and do not encourage employees to engage in conduct contrary to our values or policies.
- Seek guidance from the Office of Compliance, Human Resources, Legal, other management personnel, or our Business Conduct Hotline on issues of concern or to seek guidance in difficult situations.
- Hold employees responsible for their conduct.

## Our business partners

In addition, we expect that our suppliers, agents, and business partners meet the same high standards when working on Qualcomm's behalf. Please email [suppliercode@qualcomm.com](mailto:suppliercode@qualcomm.com) for more information.

## Additional Details:

→ [Open Door Philosophy](#) (go/opendoor)

## Our Code at Work

**Q:** A vendor that you work with raises a concern to you regarding another Qualcomm employee in a different department that they are working with on a separate project. The vendor indicates that this employee is asking them to make charitable donations to one of the non-profits that the employee supports. The vendor is worried that if they don't make the donation, this employee will circulate negative feedback about the vendor and they will not be considered for future work. Should you raise this concern to Qualcomm?

**A:** Yes. As a Qualcomm employee, you should share this concern with the Company to ensure that it is addressed. Your involvement can be kept confidential and the information will be shared only with those who need to know in order to investigate the claim. It is not appropriate for Qualcomm employees to make these kinds of requests of any of our vendors or business partners, as it would be considered a conflict of interest if the claim is substantiated. Each of us is responsible for reporting known or suspected violations of the Code to the Company.



# Seeking Guidance and Raising Concerns

We are all responsible for being familiar with our Code, seeking guidance, and raising concerns. Qualcomm has an Open Door Philosophy, which encourages everyone to feel comfortable speaking up and raising concerns.

Even when we know and understand the Code, there may be times when it is not clear how to do the right thing. Or, we may just want confirmation that we are making the right decisions. We have a number of resources in place to seek guidance or raise concerns, including:

- Your manager
- Any member of management
- Human Resources/HR Hub
- The Legal Department
- Office of Compliance
- Our Business Conduct Hotline

Qualcomm addresses concerns raised to the Company promptly, professionally, and confidentially to the extent possible. Each of us is responsible for raising concerns and cooperating with investigations.

Qualcomm will not tolerate retaliation against anyone for raising concerns in good faith regarding an actual or suspected violation of our Code, Company policy, or the law. If you know or suspect that you or someone else has experienced retaliation, these concerns should be raised immediately through any of the methods listed here.







# Seeking Guidance and Raising Concerns continued

## Our Business Conduct Hotline

Our Business Conduct Hotline is a 24-hour resource available for you to share questions or concerns. Administered by a third party, it allows you to raise issues anonymously, where local country law permits. When you contact the Hotline, you will be assigned an identification number and security codes that you may use to follow up or provide additional information. All reports will be promptly and fully investigated.

The Business Conduct Hotline website can help you find your local phone number or raise a concern via an online tool.

## Our Code at Work

Q: You want to raise a concern, but you are not entirely sure something is wrong. Do you report it?

A: Yes. Sometimes people worry about raising a concern because they are not 100% sure there is a problem. You are encouraged to raise any good faith concerns you may have. If no problem is found, then no action will be taken; if we identify that there is a perception gap that caused the concern, we will address it. If there is a problem, then raising the concern gives the Company the opportunity to investigate and address it as early as possible.

## Additional Details:

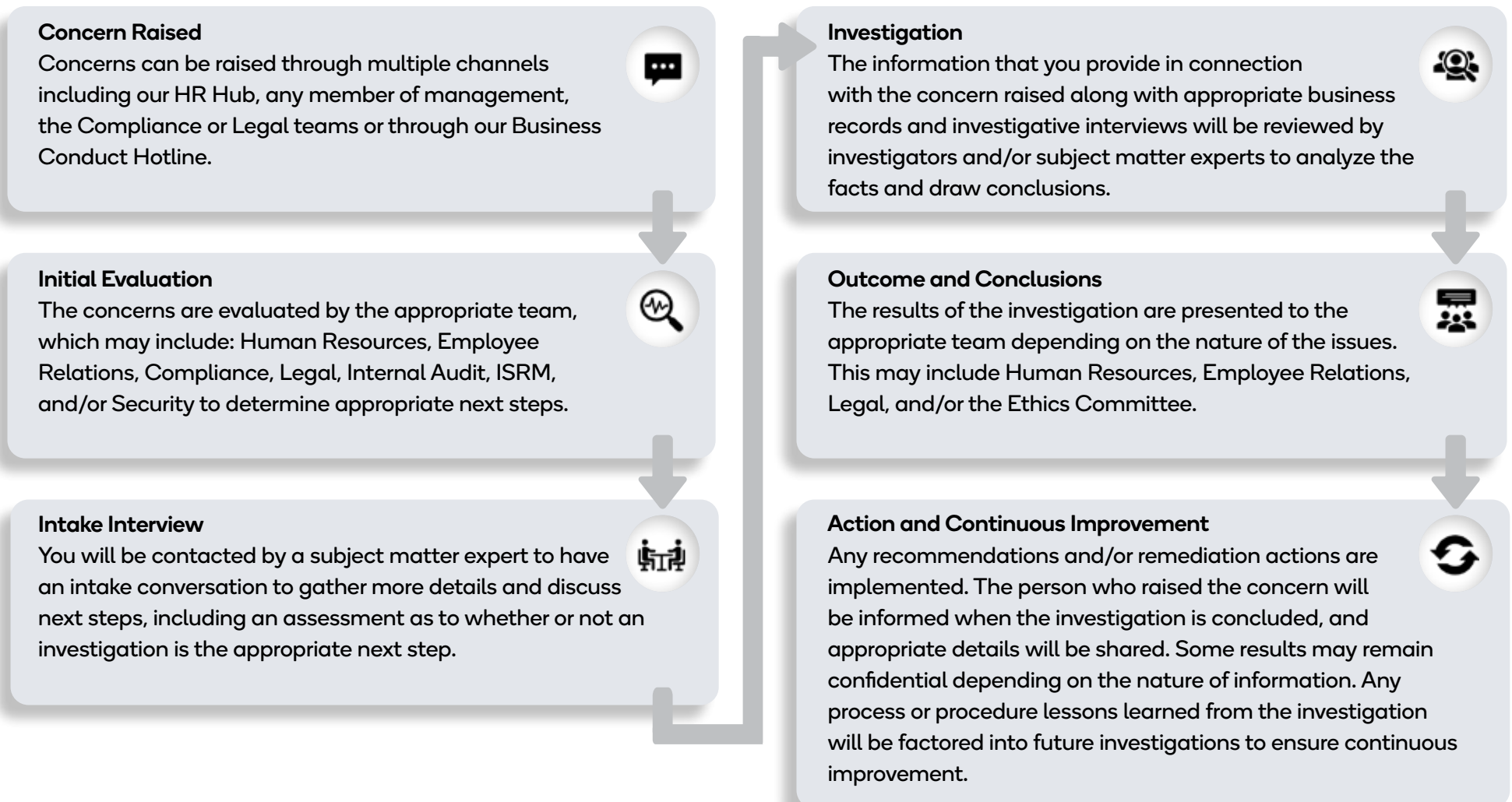
- [Business Conduct Hotline](#) (go/hotline)
- [HR Hub](#) (go/hrhub)
- [Speak Up](#) (go/speakup)
- [The Open Door](#) (go/theopendoor)





# Seeking Guidance and Raising Concerns continued

## Qualcomm's Internal Investigation Process





# The Way We Respect Each Other

Qualcomm ideas are changing the world every day. And these ideas are brought to life by strong teams that work collaboratively, inclusively, respectfully, and with open communication and trust.

Everyone plays a role in creating a positive, safe, secure, and productive work environment, where we can all feel included, empowered, and inspired to do our best.

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# Maintaining a Positive Work Environment

We celebrate the diversity of our workforce and teams, and recognize that our varied backgrounds, experiences, and ideas are pivotal to our success. We are all responsible for fostering a diverse workplace that is inclusive and welcoming to all.

**Qualcomm does not tolerate any form of discrimination or harassment.**

## Lead the Way

**We work together to ensure that our workplace is one of inclusion and respect.** Our colleagues, job applicants, and business partners should be assessed on the basis of their qualifications, demonstrated skills, and achievements, and not on characteristics such as, nationality, race, religion, ethnicity, disability, sexual orientation, culture, or gender.

This means we each have the responsibility to:

- Respect and value the contributions of each team member.
- Seek to recognize and counter the cognitive biases we may hold when making decisions or assessing others.
- Acknowledge, embrace, and leverage our differences to promote innovation and collaboration.

**We create and maintain a safe, welcoming work environment, free of offensive, intimidating or inappropriate behavior.**

We do not tolerate any form of harassment, including:

- Direct or indirect threatening remarks
- Sexual advances or harassment
- Racial or religious slurs or jokes
- Bullying
- Any other harassing behavior prohibited by law

If you believe you have been subjected to sexual harassment or any other form of harassment or if you have observed any conduct which is or could be perceived as discriminatory or harassing, you should immediately report the situation to Human Resources or [cobc@qualcomm.com](mailto:cobc@qualcomm.com).





# Maintaining a Positive Work Environment continued

## Our Code at Work

**Q:** You receive an email from a co-worker that contains an email signature that is offensive. It's not directed at you; in fact, it's not directed at anyone in particular, but it makes you uncomfortable. What should you do?

**A:** Notify Human Resources. Even if the email is not intended to be offensive to anyone in particular, it doesn't demonstrate the tolerance and respect for each other that underlie our values. If comfortable, you are also encouraged to respectfully confront the co-worker who sent the email to let them know that you found their email inappropriate.

## Additional Details:

→ [Global Inclusion and Diversity site](#) (go/GID)

→ [Prohibition of Harassment Policy](#) (go/harassment)





# Environment, Health & Safety (EHS)

Qualcomm is committed to conducting its operations and business activities in a manner that provides and maintains safe, healthful, and productive working conditions, protects the environment, and conserves natural resources. As a Qualcomm employee, you are expected to perform your work in compliance with all applicable health, safety and environmental laws and regulations, and our EHS Code of Practice.

## Lead the Way

To maintain a safe and healthy work environment, we must:

- Take personal responsibility for employee health and safety and actively foster a culture of safety in your work area.
- Understand the hazards associated with your work, and only perform work for which necessary EHS training has been completed.
- Ensure your vendor, contractor, or business partner who work on our premises is made aware of Qualcomm's EHS Code of Practice and comply with all relevant health and safety procedures.
- Promptly report workplace related injuries, incidents, hazardous releases to the environment, regulatory violations, or unsafe workplace conditions to your manager, HR, or the EHS team.

## Our Code at Work

**Q:** During the global pandemic, you noticed that some onsite employees were not following the safety protocols that the Company had established. What should you do?

**A:** We have safety procedures in place for a reason: to ensure that employee safety always comes first. Don't wait for something bad to happen; raise your concerns about the situation to a member of management or Human Resources immediately.

## Additional Details:

→ [Environment, Health & Safety site](#) (go/ehs)

→ [EHS Code of Practice](#) (go/ehspolicies)

→ [Coronavirus \(COVID-19\) Information Site](#) (go/coronavirus)







# Workplace Security

At Qualcomm, all employees are active in helping to create and maintain a secure environment to promote the safety of our employees and the security of our facilities and confidential information.

## Lead the Way

We follow the Company's badge policy. This includes scanning our identification badges at building entry points, even if we are entering the building with others. It also means we don't loan our badge to others, and we report missing, lost, or stolen badges immediately. We also manage our visitors by ensuring they are escorted at all times, and we never prop locked doors open for ease of entry.

We also ensure our colleagues are safe by reporting suspicious or concerning circumstances to the Security department. This includes employees or non-employees behaving in a manner that is suspicious or potentially dangerous, visitors inside our facilities without an escort, any personal threats or threatening behaviors, and other illegal or inappropriate activities.

To maintain a safe, secure, and healthy work environment, we must never:

- Intimidate, harass or threaten anyone – directly or indirectly.
- Commit acts of violence as prohibited by our Workplace Violence Policy.
- Possess weapons of any kind on Qualcomm property, including Company parking areas.
- Violate Company policies that prohibit the unlawful use, distribution, possession, or sale of alcohol, drugs, or other controlled substances.

In addition, we protect both our intellectual and personal property by physically locking our computers when we walk away from them, and we maintain clean workspaces without Company confidential documents or valuable items left out and unsecured at the end of the day. Company confidential documents are also placed in secure shred boxes when they are no longer needed.

Finally, we are good corporate citizens. We leave a note when we bump someone's car, we turn in property that has inadvertently been left behind, and we let each other know when we see a potential security threat.

## Additional Details:

- [Global Security, Cyber Security, Product Security](#) (go/security)
- [Drug Free Workplace Policy](#) (go/drugfree)



# Respecting People's Privacy

Qualcomm respects the privacy of all individuals and takes Personal Information protection seriously. We do this by following applicable privacy and data protection laws and building a foundation of privacy and data security practices.

## Lead the Way

We take precautions to responsibly and diligently protect the privacy of:

### Our customers

We embody our Privacy Guiding Principles and follow our Customer Personal Information Policy when developing products and services and handling our customers' and consumers' personal information.

### Our fellow Qualcommers

We collect and manage employee Personal Information in a manner that respects employee privacy and complies with applicable laws. For any employees or vendors whose job responsibilities involve collection or management of this information, we take measures to ensure they know and comply with data protection laws and applicable company policy.

## Additional Details:

- [Privacy Guiding Principles](#)
- [Privacy Guidelines for Personal Data Management](#)
- [Privacy Policies and Resources](#) (go/privacy)
- [Customer Personal Information Policy](#)
- [Privacy team](#) (privacy@qualcomm.com)

### Personal information can include:

- Contact information (phone, email, etc.)
- Passport number
- Compensation details
- Medical and benefits information
- Internet Protocol (IP) addresses
- Account numbers





# The Way We Protect Our Tools for Innovation

Throughout our history, Qualcomm has made the impossible possible, driving technology leadership and continually raising the bar. One way we do this is by safeguarding our inventions and other physical and intellectual property that forms the basis of our business success.

Our tangible resources include our physical property and our assets. Equally important are our intangible resources, which include our ideas, business strategies, and other intellectual property that keep us on the industry's cutting edge. It's up to each of us to protect these resources.

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# Protecting Confidential Information

Our industry is competitive. It is critical that we maintain our position as an industry leader – and the trust of our consumers and partners. We do this by always protecting confidential information, whether it's information about our Company, our customers, our employees, or third-party information that has been entrusted to us.

## Lead the Way

We take proper precautions to protect confidential information.

- We don't share inappropriately. We don't disclose or distribute this information unless there is a legitimate business need and it has been authorized by Qualcomm. Before disclosing information that may be confidential – whether oral, visual, or written – we must ensure written confidentiality obligations approved by the Legal Department are in place (such as a written Nondisclosure Agreement (NDA)).
- We use information responsibly. We use this information only to perform our job duties.
- We're secure. We adhere to Qualcomm's cyber security policies and procedures, as well as document control processes. We also guard our Company passwords.
- We watch where we talk. We don't discuss confidential information in places where others could overhear it, such as around family members or roommates, remote locations, at a trade show, or in an airplane, train, or elevator.

- We exercise care when deciding whether to receive confidential information. Before entering into an NDA with a third party, we should consider whether it is possible to maintain a business relationship without exchanging confidential information. For example, avoiding this exchange of confidential information can help to prevent accusations of being swayed by that knowledge when developing similar products or businesses.
- We respect obligations we assume in NDAs. We never use, copy, distribute, or disclose confidential information outside the terms of the NDA or applicable confidentiality obligations.
- We recognize that our confidentiality commitment may extend beyond the term of the NDA. Our obligations to maintain the confidentiality of both Company and third-party information continue even after our employment with Qualcomm ends. Anyone leaving the Company must immediately return all Qualcomm property, including documents and media that contain Qualcomm confidential information, as well as any third-party confidential information received during their employment at Qualcomm.



# Protecting Confidential Information continued

The Legal Department is a valuable resource when it comes to confidential information concerns. Consult them if:

- You know of or suspect an inappropriate attempt to obtain or disclose Qualcomm confidential information.
- You receive information that you believe may be third-party confidential information that Qualcomm is not authorized to have or use.

## Our Code at Work

**Q:** You're at a restaurant with colleagues and the discussion turns to the details of a new product Qualcomm is developing. You look around and see lots of people – but not anyone you know. Should you continue the conversation?

**A:** No. You should always carefully protect our Company's confidential information – especially in public places. It would be best if you politely redirect the conversation. Don't take chances; even a small, inadvertent disclosure can cause harm. You never know who is listening.

**Qualcomm confidential information includes any Company information not generally known to the public or the industry. Examples of such information include (but are not limited to):**

- Technical or engineering information for current and future products
- Work product resulting from your efforts at Qualcomm
- Information about potential acquisitions or investments
- Business or marketing plans or projections
- Contractual terms
- Earnings and financial data
- Customer information
- Information about organizational structure and changes
- Personnel information
- Software in object or source code form
- Third-party information protected by confidentiality obligations (e.g., under a non-disclosure agreement (NDA))

## Additional Details:

→ [Use and Protection of Company Confidential Information Policy](#)

→ [QSAFE site](#) (go/qsafe)

→ [Request an NDA](#) (go/NDA)



# Protecting the Power of Ideas

Qualcomm's valuable intellectual property (IP) portfolio and licensing business generate a substantial portion of our overall revenue. So, we understand the power of ideas – and how critical it is to protect them.

## Lead the Way

Qualcomm owns the rights to anything our employees develop or create, to the extent permitted by law, regardless of where or when it's created or whether it is patentable or protectable by copyright, trade secret, or trademark. Even if the IP developed does not relate to Qualcomm's actual or anticipated business interests and was not the result of a work assignment, it still may be owned by the Company. Therefore, we must each submit the intellectual property we develop to Qualcomm and protect it as we would any other Qualcomm confidential information.

What can compromise our Company's intellectual property?

**Open Source Software:** All use, review, and development of Open Source Software should be performed in compliance with our Open Source policies and procedures. In particular, before committing to the use of any open source software in Company products, file an Open Source Request or reach out to the Open Source team for guidance.

## Industry Associations & Standard Setting Organizations (SSOs):

We need to ensure that all memberships are appropriate, and that the Company is in a position to comply with all membership terms and conditions. To do this, employees must first get approval from a manager and the Standards Review Team, including the Qualcomm lead for that industry group before joining, participating in, or contributing to these types of organizations. If approved, they must:

- Follow the appropriate policies and procedures.
- Comply with all applicable competition and antitrust laws.
- Avoid conflicts of interest.
- Protect Qualcomm's intellectual property.
- Submit any standards-related inventions to Qualcomm.
- Understand and follow the commitments we have to the SSO.
- Contact Qualcomm Technology Licensing (QTL) with questions or to get approval on entering into agreements.

We also respect the intellectual property rights of other organizations. This means we never knowingly infringe on their copyrights, trademarks, or patents. We should also never bring to Qualcomm confidential and proprietary information that came from or may belong to a former employer. In addition, we have a duty to make sure that all third-party software we are using is appropriately licensed and that we are using it only in accordance with the terms of the license.

If you have any questions or concerns about intellectual property, consult the Legal Department.



# Protecting the Power of Ideas continued

## Our Code at Work

**Q:** You are a Qualcomm engineer working on the implementation of new system protocol. This project sparked an idea for you – it's a new framework that you decide to design on your own time, with your own resources. Since this was done completely independently of Qualcomm time and assets, who owns the idea?

**A:** Because you are a Qualcomm employee and this idea is related to Qualcomm's business, Qualcomm may own the rights to the design, no matter where or when it was created (subject to applicable law). Individuals may be able to apply for patents or other forms of individual recognition for the idea within Qualcomm, but these matters should be discussed with the Legal Department (including in the country where you are located) to determine the appropriate course of action.

## "Intellectual property" refers to:

Anything we create while employed at Qualcomm that is within the scope of Qualcomm's business interests and may constitute protectible intellectual property under patent, trade secret, copyright, or trademark laws. Examples include ideas, inventions, designs, software, strategies, and plans.

## Additional Details:

- [Electronic Media Policy](#) (go/emedial)
- [Open Source Policy, Process, and Team](#) (go/oslg)
- [Standards & Industry Organizations Policies and site](#) (go/standards)
- [Use and Protection of Company Confidential Information Policy](#)
- [Standards Review Team](#) (qtl.standards@qualcomm.com)





# Safeguarding Our Electronic Assets

## Lead the Way

We are all responsible for using Company resources wisely, respecting the following principles:

- Qualcomm's e-media is Company property and is provided for business purposes.
- Use of Company e-media systems is permitted, as long as you: (1) do not violate the law or our Company policies and (2) recognize that such use can and will be monitored as noted below.
- To protect Qualcomm's legitimate interests and for the safety and security of our employees and property, the Company monitors our e-media and data processed over Qualcomm's networks and systems. We process the data we collect in the US and other countries. See the links below for additional details.
- Company resources should never be used to download, display, print, or store material that is unlawful, inappropriate, offensive, or creates an excessive strain on our systems.

If you suspect or know of potential theft, fraud, mishandling, or misuse of any type of Qualcomm property, it's your responsibility to raise your concerns immediately to any member of management, Global Security, or Human Resources.

**Examples of Qualcomm e-media include both physical property and electronic media such as:**

- Computers
- Printers
- Phones
- Network and Internet access
- Email
- Collaboration tools (e.g. Microsoft Teams)

## Our Code at Work

**Q:** I am on a deadline to deliver key information to customers in a short timeframe. Can I upload the files to my personal cloud account to be able to quickly access them later?

**A:** No. Transferring or storing Qualcomm Confidential Information on personal cloud accounts or devices puts our data at risk and is a violation of Company policies.

## Additional Details:

→ [OneIT Policies](#) (go/itpolicies)

→ [Use and Protection of Company Confidential Information Policy](#)

→ [Electronic Media Policy](#) (go/emedial)

# Being Responsible with Company Funds

When we spend the Company's money for travel, entertaining, procuring goods, or other business-related needs, we always use discretion and are frugal wherever possible.

## Lead the Way

Spending money on behalf of Qualcomm requires us to be careful and deliberate in our decisions. Some helpful guidelines to keep in mind are:

- Do not charge personal expenses to the Company.
- Ensure expenses are moderate, reasonable, and not excessive for the situation.
- Follow all of Qualcomm's travel expense policies or travel-related expense policies.
- Select venues that are appropriate for business and local customs and that align with Qualcomm's values.
- Seek appropriate approvals on expenditures per Company policies.
- Give primary consideration to vendors designated by the Company to be used for specific purchases.
- Provide the appropriate documentation when submitting expenses for reimbursement, including receipts, invoices, or notes.
- When unsure if an expense is appropriate or reasonable, seek guidance and ask questions of your management and/or finance team.

**Note for Managers:** You are responsible and accountable for expenses incurred and budgets established by those in your organization. By approving expenses, you are indicating that you have reviewed them, including supporting documentation such as receipts and notes, and they are in accordance with Company policies and business unit objectives.

## Additional Details:

- [Travel Expenses](#) (go/travel)
- [Expenditures Approvals](#) (go/approvals)
- [Spending Guidelines](#) (go/travel)







# The Way We Build Trust

The Qualcomm Way can be summarized as “doing the right thing.” When we follow The Qualcomm Way, we build trust with each other, our customers, our business partners, our stockholders, and the communities in which we live and work.

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# Avoiding Conflicts of Interest

Conflicts of interest can occur when a personal interest or activity (like a gift, a personal relationship, or an outside interest) influences – or appears to influence – our ability to use good judgment or make objective business decision(s). They erode trust, may put the Company at risk and could damage reputations. At Qualcomm, each of us is expected to be transparent, avoid situations that may present actual, potential and/or perceived conflicts, and ensure that we are always acting in the best interest of the Company.

## Lead the Way

We are each responsible for actively avoiding any situation in which a conflict of interest might arise. While conflicts of interest come in a variety of formats and scenarios, there are some common situations that we should all know how to handle.

## Gifts, Entertainment, and Hospitality

We should never give or accept gifts, or anything else of value, if it could appear to improperly influence our judgment or any business decision.

In general, we should not solicit gifts and may not accept gifts of more than nominal value. Perishable gifts or marketing materials with a company logo are generally not considered improper. An infrequent meal may be accepted or given if it is held at an appropriate location and is not excessive, and where the purpose of the meeting is to enhance the business relationship.

The giving of a gift, hospitality, or entertainment should not place the recipient under any obligation, and the giver of the gift should not expect anything in return.

Please see the Conflicts of Interest Policy and Global FCPA and Anti-Corruption Policy for more guidance on giving and receiving gifts.

## Personal Relationships

There may be situations where immediate family members, close friends, or those with whom we are in an intimate relationship with are employed by Qualcomm, its suppliers, or competitors. In these situations, transparency is important, so it is important to disclose such situations to a manager, Human Resources, the Office of Compliance or the Legal Department as soon as you become aware of them. The Company can then evaluate and take appropriate steps to avoid even the appearance of a conflict of interest.





# Avoiding Conflicts of Interest continued

## Outside Activities

Unless otherwise approved by the Company, we are expected to devote our full business efforts to Qualcomm and should refrain from engaging in any outside business activities. In addition, we may not take for ourselves (or for another person) a business opportunity in which Qualcomm could be interested.

For-profit outside board memberships or advisory board service is prohibited unless employees are acting on Qualcomm's behalf in connection with their role and responsibilities for the Company (for example, a member of the Qualcomm Ventures department that sits on the board of one of Qualcomm's portfolio companies). Exceptions to this prohibition are disfavored and must be approved in advance by the Department Vice President or Senior Vice President, EVP of Human Resources, the Chief Compliance Officer and the Chief Executive Officer.

If you believe you may have a conflict of interest or observe a situation where a conflict of interest may be present, contact the Office of Compliance or email [conflict-of-interest@qualcomm.com](mailto:conflict-of-interest@qualcomm.com) for guidance on how best to navigate the situation.

## Additional Details:

- [Conflicts of Interest Policy](#) (go/conflict)
- [Global FCPA and Anti-Corruption Policy](#) (go/fcpa)

## Our Code at Work

**Q:** A third-party consulting firm contacts you to act as a consultant for market research purposes. They have offered a \$100 gift card for a half hour initial interview. As a Qualcomm employee, should you consider accepting this offer and participating in the interview?

**A:** Any outside business activities, other than charitable or non-profit activities, could present a conflict of interest, so it must be reviewed on a case-by-case basis for potential risks and requires preapproval in advance by your management (supervisor and Department Vice President or Senior Vice President), HR representative, Corporate Legal and the Office of Compliance.

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**Q:** You are a software engineer who creates apps and video games in your free time, and you do not believe that it has anything to do with Qualcomm or its business interests. Is this activity permitted by Qualcomm's Conflict of Interest policy?

**A:** Requests related to outside business activities, such as app and video game development, are reviewed on a case-by-case basis for potential conflicts of interest. To ensure compliance with Qualcomm's Conflict of Interest policy, you should obtain pre-approval by submitting a [conflict review survey](#) with information about the software applications you are developing. The survey will be routed to all required approvers. These requests are assessed based on the facts provided. If your request is approved, it is your responsibility to notify your manager and [conflict-of-interest@qualcomm.com](mailto:conflict-of-interest@qualcomm.com) if any of the conditions of your involvement in the outside business activity should change, so that it can again be assessed for potential conflicts.





# Avoiding Insider Trading

**Insider trading happens when a person or entity trades in a security (e.g., purchase/sale of stock, options, puts, calls) while in possession of “material non-public information.” Material non-public information is information relating to a company that is not available to the investing public and that is likely to influence a reasonable investor’s decision to buy or sell securities of that company. Both positive and negative information may be material.**

**Insider trading is illegal, unethical, and violates our Insider Trading Policy and this Code.**

## Lead the Way

Through your work at Qualcomm, you may become aware of material non-public information about Qualcomm or other companies, such as customers, licensees, vendors, or acquisition targets. If you obtain material non-public information about Qualcomm or another company, you may not trade in that company’s securities. Using this information for your own personal benefit or disclosing it to others who use it for their benefit, are violations of the United States Securities Laws, our Insider Trading Policy, and this Code. In addition, if you disclose material non-public information to a third party (e.g., a friend or relative) who then trades based on that information, that third party is also in violation of the Federal Securities Laws. Violations of these laws may result in civil and criminal penalties, including fines and jail sentences.

In addition, please note that any derivative transaction in Qualcomm securities (e.g., puts, calls, publicly traded options) is also prohibited by our Insider Trading Policy, regardless of whether the transaction involves the use of material non-public information.

For guidance in this area, contact Corporate Legal or the Office of Compliance.





# Avoiding Insider Trading

continued

**Examples of information that could potentially be material, non-public information include actual, potential, or projected:**

- Financial performance, including earnings or guidance.
- Significant mergers, acquisitions, joint ventures, or divestitures.
- Events regarding a company's stock, including stock repurchases, dividends, stock splits, or new equity or debt offerings.
- Significant contracts, orders, design wins or losses, partnership arrangements, product developments, or technology advancements.
- Significant information about customers, licensees, or other business partners.
- Litigation, arbitration, or regulatory matters (including threatened matters), and significant developments in such litigation, arbitration, or regulatory matters.

## Additional Details:

→ [Insider Trading Policy](#) (go/insider)

→ [Insider Trading FAQs](#)

## Our Code at Work

**Q:** You have been planning for a remodel for several months, and you put in a "good until sold" order on some of your vested Qualcomm RSUs and ESPP shares to pay for the remodel. Prior to the sale of the stock, you learn that Qualcomm is in discussions to acquire a large company, and that information is not yet public. Since your sell order of Qualcomm stock has been in place for some time and is not based on this new information, is it OK to let the sell order stand?

**A:** No. If you come into possession of material non-public information at any time before the sale of the stock, you must immediately cancel any outstanding orders. You may not trade in Qualcomm securities while in possession of material non-public information about Qualcomm.

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**Q:** You are working on a chip design and attend a meeting to discuss it with members of senior management. During the course of that meeting, a senior manager takes a phone call wherein she talks about an investigation of Qualcomm by a foreign regulator. Qualcomm stock has been soaring, and you have been planning to sell anyway. You have no way to independently verify what you have heard. After the meeting, you call your spouse and provide the information you have heard. Can they sell Qualcomm stock?

**A:** No. Neither you nor your spouse (or anyone) may trade in Qualcomm securities while in possession of material non-public information about Qualcomm. It does not matter that they are not a Qualcomm employee or that you cannot verify the information you have heard.



# Selecting Our Suppliers

An open, honest, and fair partner selection process allows us to build supplier relationships based on mutual trust and ensure that the Company's best interests are pursued.

## Lead the Way

We choose suppliers and vendors who stand behind the quality of the products and services they provide, and who abide by both our Code and the law. Our decisions are based strictly on business considerations and Qualcomm's best interests, without regard to personal or financial gain or personal relationships.

- We may not accept money, or benefits of any kind, for any advice or services we provide to a supplier in connection with obtaining or retaining business on Qualcomm's behalf, or for directing business to a specific supplier.
- When making selections amongst competing suppliers, we engage our procurement team, and follow a process that allows us to weigh the facts impartially to determine the best supplier for our Company's needs.
- We should disclose any actual, potential, or perceived conflicts of interest to a manager, Human Resources, the Office of Compliance or the Legal Department.
- We require our semiconductor suppliers to acknowledge and implement the Qualcomm Supplier Code of Conduct, which embodies the principles of the Responsible Business Alliance (RBA) Code of Conduct. The Qualcomm Supplier Code of Conduct provides clarity with regard to labor, health and safety, environmental, ethics, and management expectations of our suppliers.

## Complying with Anti-Money Laundering Laws

Anti-money laundering (AML) refers to the laws, regulations and procedures intended to prevent criminals from disguising illegally obtained funds as legitimate income. Qualcomm is committed to compliance with all applicable international laws that are enacted to combat money laundering and the funding of terrorist or other criminal activities. We mitigate risks in this area by conducting customer screenings to ensure we are not transacting business with individuals or entities that are on U.S. and international sanctions lists. We also monitor for "red flags" that may signal money laundering activities, such as all-cash payments, payments made from an unknown source, or through a personal bank account.

## Additional Details:

- [Conflicts of Interest Policy \(go/conflict\)](#)
- [Sustainable Supply Chain Management](#)







# Keeping Honest and Accurate Records

Our stockholders trust us to maintain accurate and honest books and records. These records form the basis for our public disclosures and filings and provide a snapshot of our Company's operations and financial standing. Qualcomm also uses these records to make important business decisions.

## Lead the Way

Our Company records should always be complete, accurate, and understandable. We never make false or artificial entries, and we never establish any unrecorded Company funds or assets, such as "slush funds" or other "off the books" accounts.

It's important to give special attention to:

### Financial Disclosures

To ensure that our Company's financial statements are true, fair, accurate, and timely, we comply not only with the legal and regulatory requirements that govern these reports but also with Qualcomm's applicable internal controls.

### Contract Compliance

All contract commitments should be in writing and uploaded into our contract management database pursuant to Company policies, and we are careful not to make business commitments outside of what is documented in these contracts, through side deals or otherwise.

## Record Retention

We retain business records in accordance with the law, to the extent needed for business purposes, or longer if required by tax, works council agreements, regulatory, or other standards. Documents required for an audit, investigation, or other legal action should be retained pursuant to laws and other legal or contractual requirements and pursuant to Company policies and procedures. If you receive a subpoena, a request for records, or other legal documents, notify the Legal Department immediately.

If you suspect or know of any misconduct related to recordkeeping, accounting, or financial reporting, or if you have any questions, contact a manager, the Finance Department, the Legal Department, the Internal Audit Department, the Office of Compliance or the Business Conduct Hotline.

**Even if maintaining books and records is not your primary job duty, we all record information of some kind and submit it to our Company.**

**This includes the information we provide in:**

- Payroll documents
- Timecards
- Travel and expense reports
- Sales reports
- Customer and supplier records
- Design and engineering records
- Export and import records

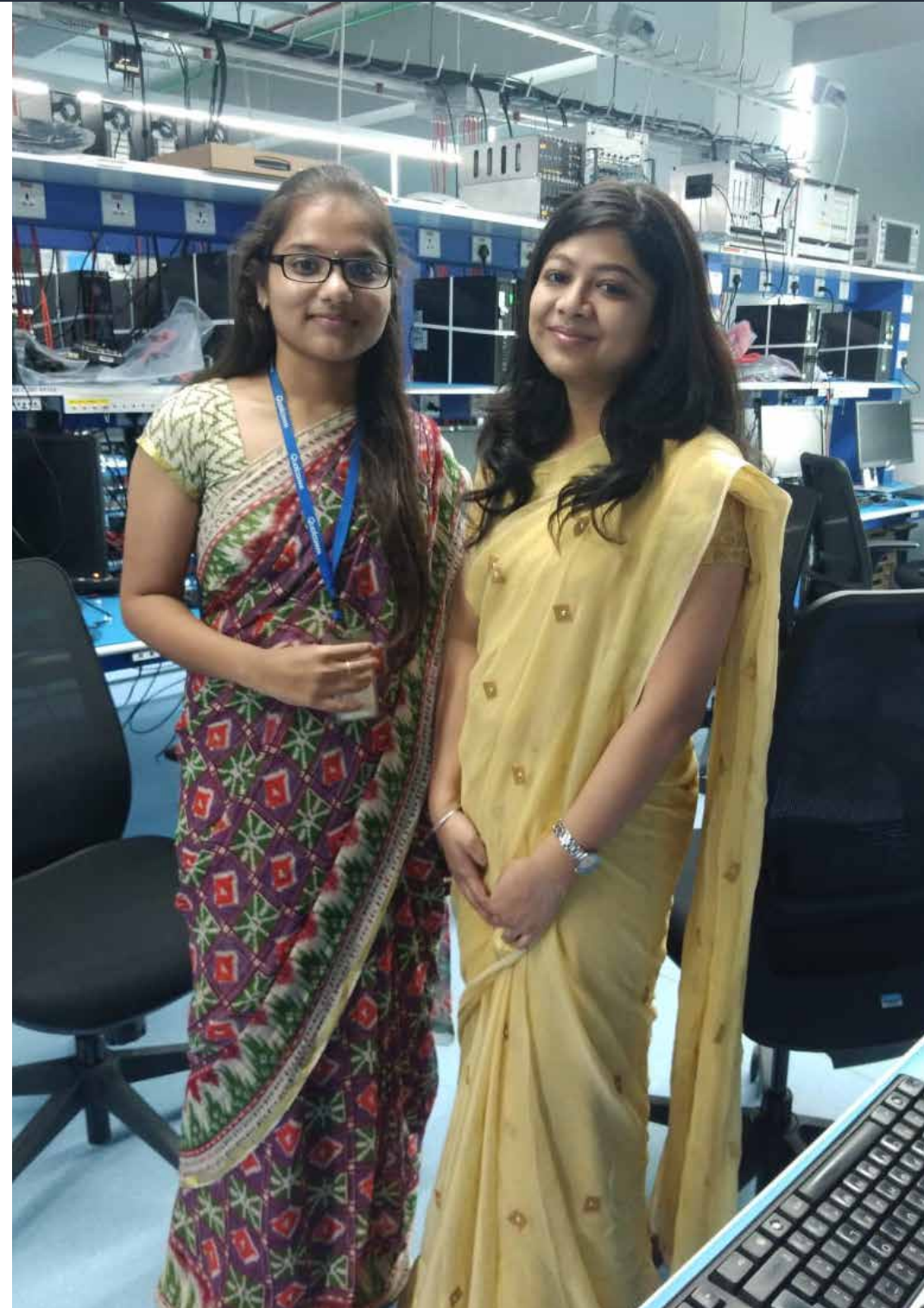


# Keeping Honest and Accurate Records continued

## Our Code at Work

**Q:** You are negotiating with a long-time vendor for a contract for outsourcing some critical engineering projects. Historically, you have negotiated contracts with this vendor where all payments are tied to specific project deliverables, as this is Qualcomm's preferred payment structure for this type of work. Outside of the contract negotiations, one of the executives from the vendor company contacted you to see if you would agree to make equal monthly payments to help them cover the cost of labor that will be required to achieve project milestones that could extend over a long period of time. The executive emphasizes the long-term relationship and the fact that the cost of the overall contract would remain the same. Is this something that you should agree to, given the proven and productive relationship we have had with this vendor over time?

**A:** No. Employees should not direct the use of funds provided to partners or customers without proper transparency, authorization, and contract terms and conditions that are reflective of the actual working arrangement between the parties, as this may result in improper accounting treatment of the contract funds in Qualcomm's books and records. Making deals outside of a written contractual agreement can undermine Qualcomm's rights and put funding and contract deliverables at risk. It would also be a violation of our Code.





# Representing Qualcomm with Integrity

As Qualcomm employees, it's critical that we represent Qualcomm honestly, fairly, carefully, and with unquestioned integrity.

## Lead the Way

We communicate accurate and honest information about our Company, and we never make misrepresentations or dishonest statements to anyone.

### Business Relationships

We abide by the agreements and contracts we have entered into and aim to resolve any disputes in a positive and constructive manner.

### The Media

Only a limited number of individuals are authorized to make public statements about Qualcomm. You should not initiate contact with journalists or other members of the media and should not respond to their inquiries without prior approval from Corporate Marketing and Investor Relations.

### Online and Electronic Communications

Electronic messages (such as emails and text messages) and posts on websites (such as blogs, Facebook, Twitter, WeChat, and LinkedIn) are permanent, transferable records and can impact Qualcomm's reputation and business interests. Use caution in these situations, never disclosing confidential business information, or posting on behalf of Qualcomm.

## Government Officials, Audits and Investigations

If asked to provide information in connection with Company investigations, audits, or other legal matters, you are required to cooperate, communicate clearly and in good faith, and ensure the auditor or investigator has a full and accurate understanding of the matter at hand. Refer requests from government officials and agencies to our Government Affairs Department or the Legal Department.

If you are unsure about who to contact regarding a request, seek guidance from your manager.

## Our Code at Work

Q: You are assigned to an early stage, cutting edge engineering project for Qualcomm. Your involvement and experience gained on this project will enhance your resume and marketability in the industry. Should you add some of the details of the project and your technical experience to your LinkedIn profile to increase your chances of being noticed or considered for other opportunities?

A: No. As a Qualcomm employee, you will have access to information that is not public and that may be considered confidential ("Non-Public Information"). Non-Public Information could include information about Qualcomm products or projects that are not publicly announced, or customer products that are not yet announced. You should not post or disclose any Non-Public Information on any Digital or Social Media Site, as this could be a violation of our Code.

## Additional Details:

- [Electronic Media Policy](#) (go/emedial)
- [Social Media Policy](#) (go/socialmedia)
- [Disclosure Policy](#) (go/disclosure)





# The Way We Follow the Law

As members of the global economy we uphold the law, working to ensure fairness in the marketplace, protection for consumers, and prevention of corruption and bribery. These laws protect our Company's interests and reputation – and we take ownership of the responsibility to abide by them.

<b>Ensuring Fair Competition</b>	<b>34</b>
<b>Preventing Bribery and Corruption</b>	<b>36</b>
<b>Export and Import Compliance</b>	<b>38</b>
<b>Following Industry Laws and Regulations</b>	<b>40</b>



# Ensuring Fair Competition

**Qualcomm engages in vigorous, yet fair competition. We sell our products and services on their merits, not by unlawfully limiting competition or obtaining competitive intelligence in a way that is unlawful or unethical.**

## Lead the Way

When promoting Qualcomm's products and services, we act with personal integrity at all times, ensuring that our competitor comparisons are accurate, substantiated, and never misleading. Please contact the Legal Department if you have any questions about any particular situation.

If a competitor attempts to discuss a confidential competitive matter, such as pricing information or our intention to bid, stop the conversation immediately and promptly report the incident to the Legal Department. Inaction on your part may be assumed by others to be explicit or tacit agreement to collude with competitors. Immediately reporting this conduct to Legal is imperative to protect you and Qualcomm.

## Competitor Agreements

We abide by antitrust and competition laws wherever we operate and never engage with competitors to limit competition. In fact, we avoid even the appearance of any improper agreement. This means that we don't engage with competitors to:

- Discuss pricing or pricing policy, margins, discounts, costs, marketing, or strategic plans
- Agree on prices or any price component (margins, discounts, etc.)
- Agree to divide or allocate customers, markets, territories, or countries
- Discuss product capacity or output
- Discuss product roadmaps or confidential technology
- Boycott certain customers, suppliers, or competitors
- Discuss employee recruitment policy and compensation

## Competitive Intelligence

In our industry, collecting information about our competitors is not only normal – it's key. But this should always be done properly, through legitimate sources.

Even if there is no formal written agreement, the mere exchange of confidential information (price related information, customers' requirements, product roadmaps, our intention to bid or not bid for a certain opportunity) with competitors can create the appearance of an informal understanding. Use caution when interacting with competitors at conferences and other similar events.





# Ensuring Fair Competition

continued

## Our Code at Work

**Q:** You receive a phone call from your counterpart at another company. Both companies are bidding for a design win with the same customer. Your counterpart suggests that you both coordinate so that Qualcomm wins this bid, and your competitor wins the next bid. Should you say yes?

**A:** No. This is a violation of both the law and Company policy. You should say that you cannot do such a thing, immediately end the call, and contact Legal.

**Q:** By coincidence, you run into your competitor at a customer's "Supplier Day." After exchanging pleasantries, your competitor starts saying that this round of negotiations with the customer was particularly challenging, and that your competitor would have trouble meeting the customer's requested discount level. Can you continue this conversation, and discuss future pricing arrangements being proposed to the customer?

**A:** No. You should reply that it is inappropriate to discuss such information, immediately end the meeting, and contact Legal.

**Q:** One of our suppliers emails you confidential roadmap information for one of our competitors. Since you didn't ask for the information, and you didn't mislead anyone to get it, can you use it?

**A:** No. We respect the confidential and proprietary information of other companies, including our competitors. If there are any questions about using previously developed documents or tools, contact our Legal Department before copying, using, or disclosing the information.

## Which Way?

When we are presented with the opportunity to gain competitive intelligence, we should ask ourselves:



Was the information obtained illegally?



Was the information obtained through misrepresentation or deception?



Was the information the result of a confidentiality breach (for example from the former employee of a competitor)?

# NO?

## GO!

This information was obtained  
**The Qualcomm Way.**

# YES?

## STOP!

We may only attempt to gather  
and use information legally,  
ethically and honestly.

If you have a question or concern about competition law or the appropriate gathering and use of competitive information, please contact our Legal Department.





# Preventing Bribery and Corruption

**Bribery and corruption can have severe legal and economic repercussions for the individuals involved, for Qualcomm and ultimately for our industry and our customers. Qualcomm strictly prohibits all bribes, corrupt payments, kickbacks and other forms of commercial bribery involving private individuals or a Government Official. We must know and abide by the various anti-corruption laws that apply to our global operations, including the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, as well as other applicable local anti-corruption laws.**

## Lead the Way

We take our responsibility for issue spotting and preventing bribery and corruption seriously, from understanding what constitutes a bribe to being aware of (and abiding by) the laws that address it. We comply with our policies and procedures, to ensure compliance with applicable anti-corruption laws.

## Bribes

We never offer or accept bribes, kickbacks, or other forms of improper benefits.

## Government Officials

We do not – directly or indirectly – offer, make, or give a bribe, kickback, payment, or anything of value to a government official (as defined in our Global FCPA and Anti-Corruption Policy) to persuade the official to violate their lawful duties, to secure an improper advantage, influence a decision, or to obtain or retain business.

Under FCPA, the term “Government Officials” has a broad definition and can refer to:

- Any employee of a non-United States Government
- An official or employee of a state-owned entity (SOE)
- Officials of public international organizations

If you are unsure whether a person you are dealing with is a government official, find out before offering, making, or giving any payment or other benefit that could be determined improper.

## Gifts or Other Benefits

Gifts and social amenities that are acceptable in commercial business relationships may be entirely unacceptable and even illegal when dealing with government officials. In countries where local customs call for giving gifts, make sure you understand the requirements of our Global FCPA and Anti-Corruption Policy, as our policy may be more restrictive than what local law or custom permits.

Note: Special rules apply to providing anything of value (other than personal political contributions) to U.S. Government Officials; before doing so, please seek guidance from the Office of Compliance.

## Third Party Engagements

Any Third-Party Representative, who may have interaction with Government Officials, as defined above, or act as agent on behalf of Qualcomm, must be submitted for third-party review and due diligence.

## Additional Details:

- [Global FCPA and Anti-Corruption Policy and site](#) (go/fcpa)
- [Compliance Expense Pre-Approval Request](#) (go/fcparequest)
- [FCPA Team](#) (fcpa.help@qualcomm.com)



# Preventing Bribery and Corruption continued

## Business Activities or Arrangements

There are certain business activities or arrangements that could raise FCPA compliance risks, so our Global FCPA and Anti-Corruption Policy details requirements related to compliance pre-approval, due diligence and/or contract language for the following types of business activities or arrangements:

- Sales Distributor, Sales Reseller or Sales Representative agreements
- Retainer Agreements (where payment is not tied to a specific deliverable)
- Company Hosted Events
- Sponsorships
- Marketing Development Funds
- International University Agreements
- International Research Agreements
- Hiring of individuals that are referred by or related to a Government Official
- Mergers, Acquisitions or Joint Ventures

Employees involved in any of these types of activities or arrangements should ensure they are familiar with the compliance requirements detailed in our Global FCPA and Anti-Corruption Policy (“FCPA Policy”) or seek guidance from the Office of Compliance.

## Recordkeeping

We must maintain detailed records that accurately reflect business transactions and expenditures, especially if we are providing benefits to third party business partners. The substance underlying a transaction must always be fairly and accurately portrayed in Qualcomm’s books and records.

## Facilitating Payments

In some countries, payments called “facilitation” or “grease” payments that are made to government officials to expedite routine, non-discretionary governmental actions are common. Qualcomm does not permit such payments.

If you have any questions relating to bribery or our anti-corruption compliance program, seek advice from the Office of Compliance, the Legal Department, or refer to our Global FCPA and Anti-Corruption Policy.

## Our Code at Work

**Q:** You have been working on a special project with an employee of a state-owned entity. You would like to give them a gift card to thank them for their extraordinary effort and contributions on the project. Is this acceptable?

**A:** No. Gifts or other benefits that we wish to provide to government officials or employees of a state-owned entity should be carefully scrutinized, and providing gift cards or any other cash equivalent is improper and prohibited under our FCPA Policy. If you want to consider giving a token of appreciation, you must seek pre-approval from the Office of Compliance at [go/fcparequest](#) and ensure that the gift is of modest value and tied to the promotion, demonstration or explanation of our products or services.

# Export and Import Compliance

As a global company, Qualcomm is subject to export and import regulations and laws of each country where we conduct our business. The laws vary from country to country and more than one country's laws often apply to export and import transactions. Failure to comply with relevant laws can severely impact our business and lead to significant penalties or loss of export privileges.

## Lead the Way

At Qualcomm, we follow applicable laws and Qualcomm policies and procedures in all our global activities led by both our Export Compliance and Import Compliance teams.

## Export Controls, Boycotts, and Sanctions

- Exporting Qualcomm and third-party products, services, software, information, or technology is subject to US, EU and/or other country export laws and regulations. Exports fall under three major categories: physical (shipments and hand-carries), electronic (emails, source code and software distribution), and verbal (support and services). The US rules apply to reexports and in-country transfers, and to releases of technology to non-US nationals.
- If your job involves any export-related activity, understand your responsibilities on how to properly conduct the activity and follow established policies and procedures. This includes using approved processes and systems to help ensure that exports are screened for potential risks and that proper documentation, such as licenses

and authorizations, are in place. The US actively enforces its export control rules and can impose significant penalties on companies and individuals.

- Boycotts and sanctions, along with applicable laws, vary from country to country. US anti-boycott laws are intended to discourage US businesses and their foreign branches, subsidiaries, and affiliates from participating in other countries' boycotts that the United States does not endorse. Sanctions can restrict activities such as transfers of assets, monetary payments, provisions of services, exports of sensitive technology, and travel to the affected countries, destinations, or entities. Key current targets of US sanctions include Cuba, Iran, North Korea, Russia, Syria, Venezuela, and the Crimea region of Ukraine. The US actively enforces its sanctions rules and can impose significant penalties on companies and individuals.







# Export and Import Compliance continued

## Customs and Indirect Tax

- Transporting Qualcomm and third-party products across borders is subject to the importing country's customs laws and regulations. These apply regardless of the mode of transportation, including courier shipments, carrying by hand, or in personal luggage.
- If your job involves the physical movement of any products or Company-owned items, understand your responsibilities on how to properly conduct the activity and follow established policies and procedures. Refer to Qualcomm's Shipment Policy guidelines to ensure compliance when engaging in international shipping activities.
- In each country where Qualcomm does business, we must analyze how the taxes on our transactions impact our Company. Each country has at least one, and often more than one, system of taxation. For example, value-added tax (VAT) is an indirect taxation system that applies to local sales and purchases, and imports, and can be assessed at different points in the supply chain. If your job involves managing or initiating transactions that impact Qualcomm's indirect tax exposure, verify you are following the procedures managed by the Import Compliance department.

## Supply Chain Security

- Qualcomm participates in formal Supply Chain Security government programs that help ensure integrity and security from origin to destination. Supply Chain Security at manufacturing and non-manufacturing sites is governed by an internal framework overseen by the Corporate Trade Compliance department with designated site leads responsible for implementation.
- If your job involves the movement of goods, understand your responsibilities on how to properly conduct the activity and follow established policies and procedures.

## Additional Details:

- [Export Compliance](#) (go/exportcompliance)
- [Hand Carry Policy](#) (go/handcarry)
- [Import Compliance](#) (go/import)
- [Shipment Policy](#) (go/shipmentpolicy)
- [Supply Chain Security](#) (go/scs)



# Following Industry Laws and Regulations

As Qualcomm expands into various industries with various customers, our products may be regulated by a variety of regulatory bodies around the world. It's important that we follow all applicable laws and regulations.

## Lead the Way

Qualcomm complies with all industry-specific regulatory requirements that apply to our products in the countries where we operate. Regardless of location, each Qualcomm employee has the responsibility to follow these laws and regulations.

As a global Company that does business with the government, Qualcomm is also aware of the strict legal requirements associated with selling to, negotiating with, and working with government customers. We comply with all of these requirements. If your work involves government contracts, it is your responsibility to know and follow the rules that apply to that work. For example, before entering into any contractual dealings with the United States Government, you should consult with the QGOV Legal Department to ensure that we are abiding by all applicable laws and regulations.

## Additional Details:

→ [Qualcomm policies](#) (go/policies)





# The Way We Engage with the World Around Us

At Qualcomm we embrace social responsibility. We're a Company built on creating connections: to one another and to the world around us. We consider our impact on our communities wherever we do business.

Protecting Our Environment	42
Upholding Human Rights	43
Participating in Political Activities	45
Giving Back to Our Communities	46





# Protecting Our Environment

**Qualcomm is committed to minimizing impacts to the environment throughout our business. We build environmentally conscious practices into our business operations, processes, and product designs and comply with all applicable environmental laws and regulations.**

## Lead the Way

Each of us plays an important role in the conservation and protection of our environmental resources.

- We monitor the processes and materials that go into our products and processes to make them as sustainable as technically and commercially possible.
- Through our Environmental Management System (EMS) and various hazardous substance elimination programs, we address the environmental, safety, and health impacts of our products and operations.
- We practice the “precautionary principle,” taking preventative measures regarding certain chemicals, even if science hasn’t indicated clear environmental or health hazards.
- We expand our operations while aiming to minimize our carbon footprint, conserve water, and reduce waste.

## Additional Details:

- [Qualcomm Corporate Responsibility webpage](#)  
(go/corporateresponsibility)
- [Product Responsibility](#)
- [Environment, Health and Safety Policy](#)





# Upholding Human Rights

**We believe human rights are fundamental rights, freedoms, and standards of treatment to which all workers are entitled, including without limitation, women, migrant, student, contract, temporary, and direct employees. We are committed to promoting and respecting all internationally recognized human rights. We avoid complicity in any human rights abuse throughout our Company, our operations, and our business relationships, including our subsidiaries, partners, and customers, and those in our supply chain.**

## Lead the Way

Our approach to these issues adheres to the articles enshrined in the Universal Declaration of Human Rights, the eight Core Labor Standards of the International Labour Organization (ILO), the United Nations (UN) Guiding Principles on Business and Human Rights, and the UN Global Compact Principles. In addition, Qualcomm has adopted the RBA Code of Conduct in our own operations and as our supplier code of conduct.

- We comply with applicable labor laws, including wage and hour laws, and we support our business partners who do the same.
- We prohibit the use of child labor in our operations or in any stage of our product manufacture at our manufacturing suppliers, although legitimate workplace apprenticeship or intern programs that comply with all laws and regulations are permitted and supported.

- We prohibit forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery, or trafficking of persons. All work is voluntary, and we are free to terminate employment at any time. We will never knowingly use any suppliers who engage in child, forced or slave labor, nor will we condone such practices.
- We respect the rights of employees to associate freely, join labor unions, collectively bargain under local law, seek representation and join workers' councils in accordance with local laws.





# Upholding Human Rights

## continued

- We work with our suppliers to ensure responsible sourcing of certain metals present in our products, including those metals from the Democratic Republic of the Congo (DRC) and adjoining countries.
- We require our semiconductor manufacturing suppliers to acknowledge and implement the Qualcomm Supplier Code of Conduct, which embodies the principles of the RBA Code of Conduct. The Qualcomm Supplier Code of Conduct provides clarity with regard to labor, health and safety, environmental, ethics, and management expectations of our suppliers.

### Our Code at Work

**Q:** During an onsite visit to one of our suppliers, you overhear workers saying they paid a recruiter to get their job. Do you say something?

**A:** Yes. Our Supplier Code of Conduct states that workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. Report your concerns to Legal or Human Resources or Corporate Responsibility so that this issue can be investigated.

### Additional Details:

- [Universal Declaration of Human Rights](#)
- [International Labour Organization Core Standards](#)
- [UN Global Compact Principles](#)
- [Qualcomm's Human Rights Statement](#) (go/humanrights)
- [Responsible Business Alliance Code of Conduct](#)
- [Qualcomm's Conflict Free Minerals Policy](#)
- [Supply Chain Management](#)







# Participating in Political Activities

We encourage our employees to participate in the political process as individual citizens. As a Company, we engage in the process constructively, and always in compliance with applicable laws.

## Lead the Way

Whether participating in the political process as individuals or as a Company, there are important guidelines we follow.

### Lobbying

“Lobbying” is any contact with government personnel for the purpose of influencing legislation or rule making. Some laws define lobbying more broadly to include our normal marketing activities. We comply with all relevant lobbying laws and reporting requirements. Obtain approval from our Government Affairs Department before becoming a registered lobbyist, performing any lobbying activities, or authorizing any third party to lobby on our behalf.

### Public Official and Campaign Visits

Qualcomm encourages public officials to make non-partisan visits to our locations. These visits must be approved in advance by our Government Affairs Department.

## Political Contributions

We may participate in the political activities of our choice, as long as we follow Company policies and we do so with our own money, on our own time, and by making it clear that we are not acting on behalf of Qualcomm. We never make any political contributions using Company funds or seek reimbursement for political contributions. Qualcomm will not pressure or coerce employees to make personal political contributions or take retaliatory action against those who do not.

## Our Code at Work

**Q:** You have decided to get actively involved in campaigning and fundraising for a political candidate that you support. You know that some of your colleagues at Qualcomm also support this candidate, so you reach out to them at work to ask for political contributions and to see if they would like to volunteer for the campaign. Is this acceptable?

**A:** You should not engage in political activities at work, unless the activities are directly related to your role at Qualcomm (e.g. Government Affairs). You can get involved in political activities on your own time, as long as it does not involve the use of Qualcomm’s name, assets or resources. You should always make it clear that your political opinions are your own and never act as if or state that you are speaking on behalf of Qualcomm.

## Additional Details:

- [Lobbying Disclosure Policy](#) (go/lobbying)
- [Global FCPA and Anti-Corruption Policy](#) (go/fcpa)
- [Political Contributions Policy](#) (go/political)

# Giving Back to Our Communities

**Qualcomm recognizes the importance of employees giving back to their communities by actively supporting personal causes and events.**

## Lead the Way

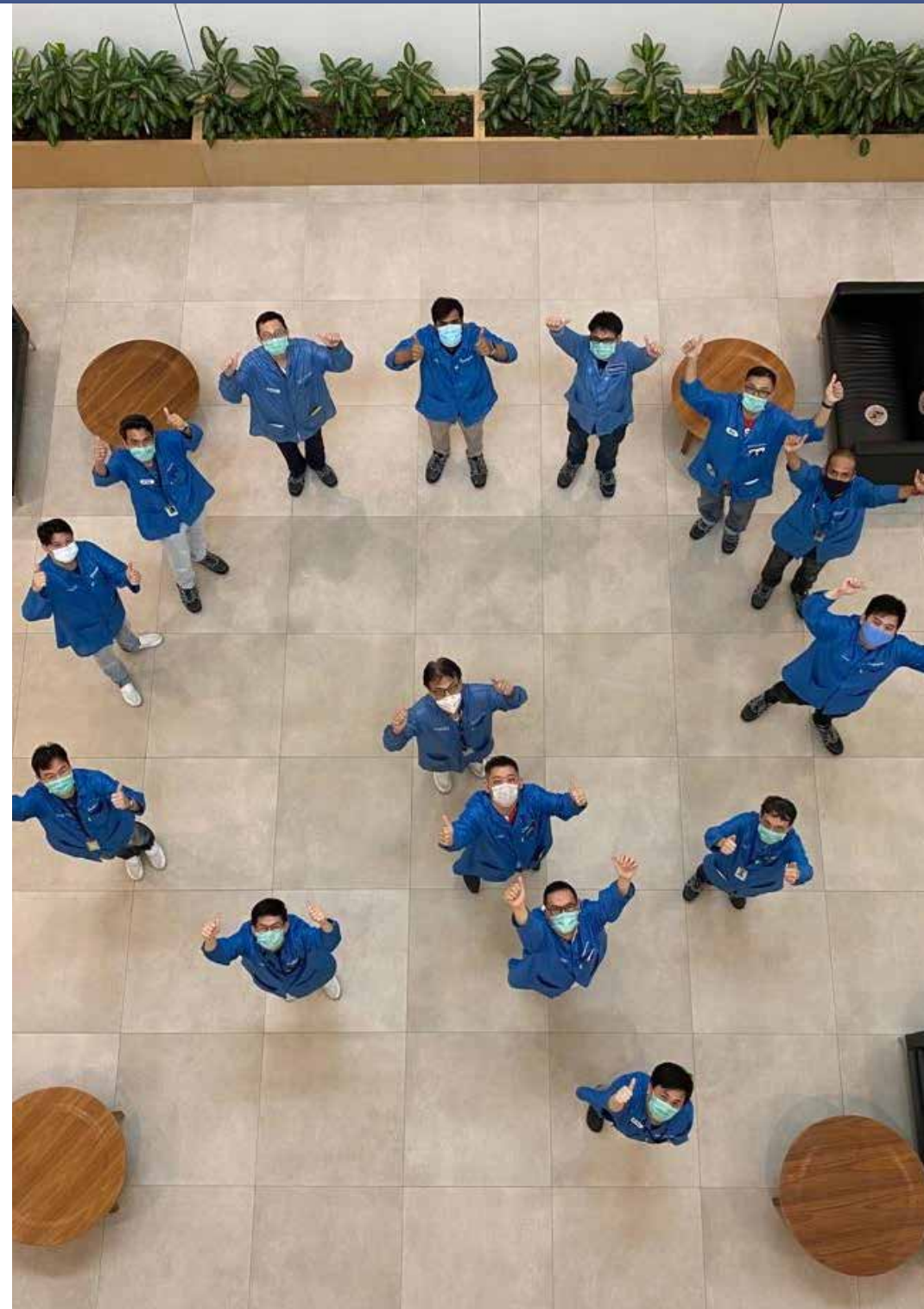
We are encouraged to be active in the civic life of our communities, but should follow important guidelines:

- Never pressure others to contribute to or participate in our preferred charitable organizations.
- Be aware of conflicts of interest that can arise – and avoid them.

## Our Code at Work

**Q:** A charity you volunteer for has asked you to volunteer at an upcoming event during the workday. What should you do?

**A:** You should discuss the opportunity with your manager and seek approval to volunteer during the workday. If you choose to volunteer in charitable activities outside of work, only use Company time or resources if you have secured management approval in advance.



# Resources

Thank you for reviewing **The Qualcomm Way: Our Code of Business Conduct**. As changes in our organization and business operations occur, we will reassess and clarify our practices, policies, and procedures. Visit our Code website ([go/cobc](https://go/cobc)) for the most up-to-date information, including links to policies, procedures, guidance, resources, and contact information.

If you have any questions or would like to discuss any concerns, there are many ways to speak up. You can reach out to:

- Your manager or any member of the management team
- Human Resources
- Legal department
- Office of Compliance
- [Ethics.mail@qualcomm.com](mailto:Ethics.mail@qualcomm.com)
- [COBC@qualcomm.com](mailto:COBC@qualcomm.com)
- Our Business Conduct Hotline ([go/hotline](https://go/hotline))

Our Business Conduct Hotline is a 24-hour resource available for you to share questions or concerns. It is administered by a third party and allows you to raise concerns anonymously, where local country law permits. The Business Conduct Hotline website can help you find a local contact phone number or raise a concern via an online tool located on the website.

**Don't know where to start?** Visit [go/speakup](https://go/speakup) or email the Office of Compliance at [Office-of-Compliance@qualcomm.com](mailto:Office-of-Compliance@qualcomm.com).

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