



The Qualcomm Way:

Our Code of Business Conduct - 2024 Edition

Qualcomm

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Letter from Our CEO

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Letter from Our CEO

For the last four decades, Qualcomm has innovated new technologies that revolutionize the way people live, work, and connect with each other. And we do all of this **The Qualcomm Way** ... with a commitment to our values of winning together, achieving excellence, making the impossible inevitable, and ... at the heart of it all ... doing the right thing.

Our commitment to doing the right thing means we achieve excellence in the right way: ethically, and in compliance with the law. When we meet ethical challenges, our Code of Business Conduct serves as a guide, helping us ensure integrity with everything we do as a company.

Please read and become familiar with the Code and refer to it as often as necessary. We are all responsible for helping everyone at Qualcomm do things the right way. Our open door philosophy encourages all employees to speak up and raise any work-related concerns without fear of retaliation. If you have questions or concerns about conduct you don't think aligns with our values or Code, contact Human Resources, the Office of Compliance, Legal, our Business Conduct Hotline, or any member of the leadership team.

Thank you for your passion and dedication, your commitment to innovation and meeting every challenge, and doing business **The Qualcomm Way**.

Sincerely,
Cristiano Amon
President & CEO, Qualcomm





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Our Values

Win together

We believe great ideas can come from anywhere – we seek to be curious while collaborating with each other, our partners and our customers.

Achieve excellence

We have unparalleled technical expertise, exceed expectations, and are relentless about execution.

Make the impossible inevitable

We turn challenges into opportunities with disruptive and transformative innovation.

Do the right thing

We always operate with uncompromising integrity, communicate openly, and treat everyone with respect



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The Way Our Code Guides Us

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 should all seek to behave in accordance with its principles every day.



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Relevant Materials You Should Know

- Code of Business Conduct website ([go/cobc](https://go.cobc))
- All policies (go/policies)
- myQ (go/myQ)



Purpose of Our Code

Our Code helps us navigate ethical and legal situations we face in our work and guides us in making decisions.

We strive to incorporate our Code and Company values in the way we do our work:

- Win Together
- Achieve Excellence
- Make the Impossible Inevitable
- Do the Right Thing

The Code guides 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
- Standards for ethical conduct
- Resources for questions or concerns

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

As our organization and business operations are continuously changing, so are our practices, policies, and procedures, but our commitment to doing the right thing remains. Visit our Code and myQ websites for the most up-to-date information, including links to policies, procedures, guidance, resources, and contact information.

- Purpose of Our Code
- [Who Follows the Code](#)
- Speaking Up at Qualcomm

 Relevant Materials You Should Know

- Open Door Philosophy ([go/opendoor](#))
- All policies ([go/policies](#))
- myQ ([go/myQ](#))
- Business Conduct Hotline ([go/hotline](#))
- Legal ([EmploymentLegal@qualcomm.com](#))
- Office of Compliance ([office-of-compliance@qualcomm.com](#))

Who Follows the Code

We are all expected to behave The Qualcomm Way – living and upholding our values every day. This includes all Qualcomm employees (including all part-time and full-time employees, including our executives), members of our Board of Directors, consultants, contractors, and other temporary workers, including interns. Each of us have the responsibility to lead by example, serve as role models, and communicate support for our values and the principles reflected in the Code. We are expected to seek guidance for difficult situations from the Office of Compliance, Human Resources, Legal, any member of leadership, or our Business Conduct Hotline.

Because Qualcomm operates in many countries, it's essential 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, we must, at a minimum, comply with the standards in this Code. In the event you believe the Code is inconsistent with local law, please seek guidance from Legal or email cobc@qualcomm.com.

Managers

Managers have additional responsibilities:

- Embrace and encourage our Open Door Philosophy so everyone feels comfortable asking questions and speaking up.
- Set clear objectives that align with our Company values and do not encourage anyone to engage in conduct contrary to our values or policies.
- Hold individuals accountable for their conduct.

Our business partners

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



- Purpose of Our Code
- Who Follows the Code

Speaking Up at Qualcomm

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 follow its principles, 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 leadership
- Human Resources and Employee Relations via myQ ([go/myQ](#))
- Employee Relations (erconcerns@qualcomm.com)
- Legal (EmploymentLegal@qualcomm.com)
- Office of Compliance (office-of-compliance@qualcomm.com)
- Business Conduct Hotline ([go/hotline](#))

Qualcomm promptly and professionally investigates, and addresses concerns raised to the Company, and maintains confidentiality to the extent possible and permitted by the law. Each of us is responsible for raising concerns and cooperating with investigations.

No Retaliation

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, raise these concerns immediately through any of the methods listed above.

Business Conduct Hotline

Our Business Conduct Hotline is a 24-hour resource available for you to ask questions or raise concerns. It is administered by a third party and allows you to raise issues anonymously if desired, where local law permits. When you contact the Hotline, you will be assigned a unique code that you may use to follow up or provide additional information. All concerns will be promptly and appropriately investigated.

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



Code in Action

You want to raise a concern, but it involves your immediate manager, and you are concerned about retaliation. Should you raise it?

Yes. You should raise any concerns you may have. 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. While Qualcomm prefers that individuals do not raise their concerns anonymously (to help facilitate a more effective and thorough investigation), our Business Conduct Hotline allows anyone to raise concerns anonymously where permitted by law.

- Purpose of Our Code
- Who Follows the Code
- [Speaking Up at Qualcomm](#)

 Relevant Materials You Should Know

- Protection Against Retaliation Policy ([go/noretaliation](#))
- Business Conduct Hotline ([go/hotline](#))
- myQ ([go/myQ](#))
- Speak Up ([go/speakup](#))
- The Open Door ([go/theopendoor](#))

Qualcomm's Internal Investigation Process

1	Concern Raised	When concerns are raised, the Company addresses them promptly and thoroughly.
2	Initial Evaluation	The concerns are evaluated by the appropriate team, which, depending on the concern raised, may include Human Resources, Employee Relations, Compliance, Legal, Internal Audit, ISRM, and/or Global Security to determine appropriate next steps.
3	Intake Interview	Member(s) of our investigative team will contact you to gather details about the concern and discuss next steps.
4	Investigation	The information that is provided, along with relevant evidence, including appropriate business records and investigative interviews, will be reviewed by investigators to analyze the facts and draw conclusions.
5	Outcome and Conclusions	The results of the investigation are presented to the appropriate decision-makers depending on the nature of the issues. This may include Management, Human Resources, Employee Relations, the Office of Compliance, and/or Legal.
6	Action and Continuous Improvement	Decisions relating to remedial or corrective actions will be made. Approved recommendations and/or remedial actions will be implemented. The person who raised the concern will be informed when the investigation is concluded, and details will be shared as appropriate while preserving the confidentiality of others, to the extent permitted by law. Any process or procedure lessons learned from the investigation may be factored into future investigations to ensure continuous improvement.

Letter from Our CEO

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- Environment, Health, and Safety (EHS)
- Workplace Security
- Respecting Privacy

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The Way We Respect Each Other

Qualcomm ideas are changing the world every day. 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.



- [Maintaining a Positive Work Environment](#)
- Environment, Health, and Safety (EHS)
- Workplace Security
- Respecting Privacy

Maintaining a Positive Work Environment

We aim to build and maintain a culture of inclusion and civility where everyone belongs and thrives while building a better and intelligently connected world. 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 and inclusive workplace.



Lead the Way

We work together to ensure that our workplace is inclusive and respectful, where each of us is valued for our unique experience and perspectives so that everyone can be their best selves at work. Our colleagues, job applicants, and business partners should be assessed on the basis of their qualifications, demonstrated skills, abilities and achievements, and not on characteristics such as nationality, age, race, religion, ethnicity, disability, sexual orientation, culture, sex/gender, or any other protected classification.

Qualcomm prohibits unlawful discrimination and harassment.

This means we each should:

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



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Relevant Materials You Should Know

- Prohibition of Harassment Policy ([go/harassment](#))
- Diversity, Equity, & Inclusion site ([go/DEI](#))
- Protection Against Retaliation Policy ([go/noretaliation](#))
- Human Resources ([go/myQ](#))
- Legal ([EmploymentLegal@qualcomm.com](#))
- Business Conduct Hotline ([go/hotline](#))



We create and maintain a safe, welcoming work environment.

We do not tolerate any form of harassment, including:

- Threatening remarks
- Sexual harassment
- Racial, ethnic, 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 are required to immediately raise your concerns to: (1) Human Resources, either through the ER Concerns email list at ERConcerns@qualcomm.com or through myQ; (2) the [Employment Legal](#) team; or (3) the Business Conduct Hotline (either through the website at <http://qualcomm.ethicspoint.com>, or through a telephone call to 1-800-300-3816). Concerns may be submitted anonymously through the Business Conduct Hotline where permitted by law.



Code in Action

You overheard a conversation between two colleagues in which one of them described witnessing potentially inappropriate conduct between two employees. Although you only overheard the conversation and were not directly involved, should you report it?

Yes, you should report it to Human Resources, Employment Legal, or the Business Conduct Hotline.

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 Relevant Materials
You Should Know

- [Environment, Health, and Safety site \(go/ehs\)](#)
- [EHS Code of Practice \(go/ehspolicies\)](#)

Environment, Health, and Safety (EHS)

We are committed to conducting our operations and business activities in a safe, healthy, and productive manner, protecting the environment, and conserving natural resources. We are expected to keep ourselves and those with whom we work safe by performing all work in compliance with applicable health, safety, and environmental laws and regulations and our EHS Code of Practice.



Code in Action

While working in the lab, you see a service vendor placing oily rags and other hazardous materials into the regular trash. What should you do?

If you see an individual working in a manner that appears to violate the Company's health, safety, or environment procedures, take steps to stop the activity. Politely but firmly remind the individual about the importance of following safety procedures. After intervening, raise your concerns with your manager, and contact the EHS team. It is crucial to report any unsafe work practice or condition that may result in harm to people, equipment, or the environment. We support a proactive and collaborative platform to help you create a safer and healthier work environment.



Lead the Way

Following basic safety guidelines can prevent workplace injuries and accidents.

To maintain a safe and healthy work environment:

- Take personal responsibility for our health and safety and actively foster a culture of safety in your work area.
- Recognize and understand the hazards associated with your work and receive applicable EHS training to protect yourself from those hazards.
- Ensure that vendors, contractors, and business partners are 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, and/or unsafe work conditions to your manager, and the EHS team.



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 Relevant Materials You Should Know

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

Workplace Security

We are all responsible for helping to create and maintain a secure environment to promote the safety of everyone and the security of our facilities and confidential information.



Lead the Way

We follow the Company's Physical Security 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 that we report missing, lost, or stolen badges immediately. We also manage our visitors by ensuring they are always escorted, and we never use objects to keep 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 anyone behaving in a manner that is suspicious or potentially dangerous, visitors inside our facilities without an escort, any personal threats or threatening behaviors, and any 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.
- Possess weapons of any kind on Qualcomm property, including Company parking areas.
- Violate Company policies regarding 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 (e.g., press the Windows key + L) when we walk away from them. We maintain clean workspaces without Company confidential documents or valuable items left unsecured. Company confidential documents are to be placed in secure shred bins when they are no longer needed.

Finally, we are good corporate citizens. We look out for one another and report suspicious activities that could impact others.



The Way We Respect Each Other

- Maintaining a Positive Work Environment
- Environment, Health, and Safety (EHS)
- Workplace Security
- **Respecting Privacy**

 Relevant Materials You Should Know

- Privacy Policies and Resources ([go/datalegal](https://www.qualcomm.com/legal))
- Data Legal team (data.legal@qualcomm.com)

Respecting Privacy

We respect and commit to uphold the privacy of all individuals and take 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

Commitment to Privacy - Whether it pertains to our workers, customers, end users, or any other data subjects, we work to responsibly and diligently maintain our privacy governance programs that include transparent privacy disclosures, practical guidelines, comprehensive review processes, readily accessible training and awareness programs, efficient channels for data subjects to exercise their privacy rights, and rigorous supplier assessment processes.

Privacy by Design - We work to integrate the principle of privacy-by-design into the development of our products and services. This proactive approach helps mitigate risks and enhance our data protection capabilities across various development stages.

Continuous Monitoring - We have various privacy assessment check points to monitor the privacy practices across different corporate departments and functions, including an annual privacy assessment on business teams that may systematically process personal information as part of their daily work. We also identify third-party suppliers that may pose high data risks and conduct continuous monitoring through our vendor risk management system.

Personal information is a broadly defined term under privacy laws of many countries where Qualcomm operates, referring to any information that may be reasonably linked to specific individuals.

Examples may include but are not limited to:

- Business contact information (phone, email, etc.)
- Account registration credentials
- Unique device identifiers (MAC address, IMEI, etc.)
- Communication content
- Facial images
- Location information



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The Way We Protect Our Tools for Innovation

Throughout our history, Qualcomm has worked to make the impossible inevitable, driving technology leadership, and continually achieving excellence. Protecting our confidential technical information helps maintain our technical leadership.

One way we do this is by taking measures to safeguard 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.



Protecting Company Confidential Information (CCI)

Qualcomm's success is based in part upon our technical leadership. As such, it is imperative that we protect 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 all need to endeavor to take proper precautions to protect confidential information, and respect the following principles:

- **Exercise good judgement when sharing information.** Don't disclose or distribute confidential information unless necessary for business purposes. Before disclosing information that may be confidential to others – whether oral, visual, or written – we must ensure that written confidentiality obligations approved by the Legal Department are in place (such as a written Non-Disclosure Agreement (NDA)).
- **Use information responsibly.** Use company confidential information only to perform our job duties and to further the Company's interests.
- **Be secure.** We are required to adhere to Qualcomm's cyber security policies and procedures, technical security standards, and document control processes.
- **Watch where we talk.** Don't discuss confidential information in places where others could overhear it, such as around family members or roommates, or in public locations such as restaurants, coffee shops, a trade show, or in an airplane, train, or elevator.
- **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 accomplish the business purpose without receiving the confidential information. By not receiving confidential information, we lessen the risk that the Company is accused of misusing that information.
- **Respect obligations we assume in NDAs and other agreements.** Comply with the letter and spirit of confidentiality obligations we assume in NDAs and other agreements.
- **Recognize that our confidentiality commitment may extend beyond the term of our employment.** Our obligations to maintain the confidentiality of both Company and third-party information continue even after our work with Qualcomm ends. Anyone leaving the Company must immediately return all Qualcomm property, including documents and media that contain Qualcomm confidential information and any third-party confidential information received during their employment at Qualcomm.

The Way We Protect Our Tools for Innovation

- [Protecting Company Confidential Information](#)
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Relevant Materials You Should Know

- [Company Confidential Information site \(go/CCI\)](#)
- [Use and Protection of Company Confidential Information Policy \(go/useandprotectioncci\)](#)
- [NDA FAQs and to Request an NDA \(go/NDA\)](#)
- [Information Security & Risk Management site \(go/ISRM\)](#)
- [Legal \(EmploymentLegal@qualcomm.com\)](#)

Promptly consult with a Qualcomm legal counsel 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.

The vast majority of information you create, contribute to, access, or receive from others while you work at Qualcomm must be kept confidential. If you are unsure about the confidential nature of information, treat it confidentially unless/until you receive guidance otherwise.



Code in Action

You have been invited to teach a class at multiple universities in an area that overlaps with Qualcomm technology. What should you do?

Each of us is generally expected to devote our full working efforts to Qualcomm and may not maintain any outside business activity that demands time and energy that affects our performance at work. Any proposed outside business activities, paid or unpaid, must be disclosed to Qualcomm in advance and will be reviewed on a case-by-case basis. Additionally, each of us has a responsibility to protect Qualcomm's CCI, as well as CCI that belongs to our customers and other third parties (including prior employers). Also, we are prohibited from bringing to, using at, or disclosing to Qualcomm any confidential information belonging to previous employers or to any third party without the prior written authorization of such employer or third parties.



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 **Relevant Materials
 You Should Know**

- Intellectual Property Policy
- Invention Disclosure ([go/invent](#))
- Trademarks, Copyrights and Marketing Legal ([go/trademarks](#))
- Open Source Policy, Process, and Team ([go/opensource](#))
- Open Source Request ([go/osrm](#))

Protecting the Power of Ideas

Qualcomm's business success has always been based in part upon technology leadership – leading the industry in the advancement of our technology. Protecting our confidential technical information helps maintain our technical leadership.



Lead the Way

Qualcomm generally owns the rights to inventions, ideas, and works of authorship developed or created by us, 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. While the below list is not all inclusive, our Company's intellectual property can be compromised through various means, such as:

Open Source Software: As Open Source software is commonly used in commercial products, it is important to understand that its usage is subject to a license agreement and the terms may not always be compatible with Qualcomm's business interests. All use of Open Source Software must therefore be done in accordance with our Open Source policy and procedures to ensure compliance with Open Source licenses and protection of Qualcomm's patent portfolio. To learn more about Open Source usage and compliance requirements, review the policy at [go/ospolicy](#) or seek guidance as described at [go/opensource](#).

Industry Associations & Standard Development

Organizations (SDOs): Qualcomm helps lead industry technical development through its participation in various SDOs. Before the Company commits to membership in an SDO, it must ensure that it is in a position to comply with relevant membership terms and conditions. All SDO memberships must be approved in advance by the Standards Review Team. If membership is approved, those participating in the SDO must review usage and compliance responsibilities at [go/standards](#).

As a Company that protects our own intellectual property rights, 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 ensure that we are not in possession of other parties' confidential information that we have not acquired lawfully and appropriately. For example, we should never bring, share, or use confidential information from a former employer. In addition, we have a duty to ensure that all third-party intellectual property we are using is appropriately licensed and that we are using it only per the terms of the license.

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

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 Relevant Materials
You Should Know

- Standards & Industry Organizations Policies and site (go/standards)
- Use and Protection of Company Confidential Information Policy (go/useandprotectioncci)
- Conflict of Interest Review form (go/conflictreview)
- Standards Review Team (legal.pm.standards@qualcomm.com)
- Legal (EmploymentLegal@qualcomm.com)



Code in Action

You are a Qualcomm engineer working on implementing a new system protocol. This project sparked an idea for you – it's a new framework 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?

Because you are a Qualcomm employee and this idea is related to Qualcomm's business, Qualcomm will 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. If you have an idea or business venture that you wish to pursue outside of Qualcomm, you should submit a Conflict-of-Interest Review form via myQ to seek required review and pre-approvals before proceeding with the outside business activity.



Safeguarding Our Electronic Assets

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Lead the Way

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

- Qualcomm's e-media systems are Company property and are provided for business purposes.
- Qualcomm discourages personal use of its e-media systems. Any personal use of a Qualcomm e-media system must be minimal and reasonable and must never conflict with business priorities, put CCI or Qualcomm e-media systems at risk, or cause any harm to Qualcomm.
- To protect Qualcomm's confidential information from loss or theft, the Company monitors our e-media systems and the data processed over our networks. We process the data we collect in this capacity in the U.S. and other countries. Use the links under the "Relevant Materials You Should Know" section for more information.
- 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, you should raise your concerns immediately to your manager, any member of leadership, Global Security, Human Resources, Office of Compliance, Legal, or our Business Conduct Hotline.



Relevant Materials You Should Know

- All policies ([go/policies](#))
- E-media Acceptable Use Policy ([go/emediala](#))
- E-media Access Control Policy ([go/accesspolicy](#))
- E-media Asset Management Policy ([go/assetpolicy](#))
- Use and Protection of Company Confidential Information Policy ([go/useandprotectioncci](#))
- Legal (EmploymentLegal@qualcomm.com)



Code in Action

You are on a deadline to deliver key information to customers in a short timeframe. Can you upload the files to your personal cloud account to be able to quickly access them later?

No. Transferring or storing Qualcomm Confidential Information on or to personal cloud accounts, personal email, or devices outside the Qualcomm firewall puts our data at risk and violates Company policies.

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

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

The Way We Protect Our Tools for Innovation

- Protecting Company Confidential Information
- Protecting the Power of Ideas
- Safeguarding Our Electronic Assets
- **Responsible Artificial Intelligence**
- Being Responsible with Company Funds

 **Relevant Materials You Should Know**

- AI Policy ([go/aipolicy](#))
- Responsible AI Principles ([go/responsibleai](#))

Responsible Artificial Intelligence

Artificial intelligence is rapidly growing in importance and provides significant business opportunities with wide-ranging applications. It is important that we take advantage of the benefits of these technological advances to support our business and customers. However, we need to recognize that AI presents legal, ethical, and business considerations which need to be managed, as the regulatory and legal framework is just being established across various jurisdictions.

We are committed to the advancement of responsible AI, and excited about our AI offerings. As such, we have developed a policy which applies to the development of AI tools, the introduction of AI into our own products and services, and our use of third-party AI platforms and datasets.



- Protecting Company Confidential Information
- Protecting the Power of Ideas
- Safeguarding Our Electronic Assets
- Responsible Artificial Intelligence
- **Being Responsible with Company Funds**

-  Relevant Materials You Should Know
- Travel Expenses ([go/travel](#))
 - Expenditures Approvals ([go/approvals](#))
 - Spending Guidelines ([go/expense](#))
 - Purchasing Card (PCard) Policy ([go/pcard](#))
 - Procurement Website ([go/procurement](#))

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, act responsibly, and ensure that the expenses are reasonable and recorded in a timely and accurate manner. We fully and accurately record anything of value provided to government officials, as required by the Company's Global FCPA and Anti-Corruption Policy.



Lead the Way

When we incur expenses on behalf of the Company, we need to act responsibly, including:

- Not charging personal expenses to the Company.
- Ensuring expenses are reasonable.
- Following all of Qualcomm's travel expense policies or travel-related expense policies.
- Selecting venues that are appropriate for business and that align with Qualcomm's values.
- Seeking appropriate approvals on expenditures pursuant to Company policies.
- When possible, using vendors designated by the Company to be used for specific purchases.
- Providing appropriate and accurate documentation when submitting expenses for reimbursement, including receipts, invoices, or notes.
- When unsure if an expense is appropriate or reasonable, seeking guidance before incurring the expense.



Note for Managers: You are responsible and accountable for expenses incurred and budgets established by your organization. By approving expenses, you are affirming 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.

Letter from Our CEO

Qualcomm Values

The Way Our Code Guides Us

The Way We
Respect Each Other

The Way We Protect
Our Tools for Innovation

The Way We Build Trust

- Avoiding Conflicts of Interest
- Avoiding Insider Trading
- Selecting Our Suppliers
- Keeping Honest and Accurate Records
- Representing Qualcomm with Integrity

The Way We Follow the Law

The Way We Engage
with the World Around Us

Resources

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.



Avoiding Conflicts of Interest

A conflict of interest arises in any situation where our personal interests (including without limitation personal, romantic, familial, or financial relationships) or activities may interfere or appear to interfere with our duty of loyalty to the Company or to make objective business decisions in the Company's best interests. We must refrain from any conflicts of interest, and exercise good judgment in engaging in conduct which could be perceived as a conflict of interest.



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 and Other Benefits

We are expected to exercise good judgment and discretion concerning the giving or receiving of gifts to or from actual/potential suppliers, customers, or other third parties.

Gifts include anything of value, e.g., meals, gifts, travel, entertainment, tickets/passes, discounts, etc. Offering and giving of gifts should be infrequent, reasonable in value, appropriate, and legal to avoid appearance of impropriety or undue influence. If the recipient is a non-U.S. government official, including employees of state-owned business partners, please review the Company's Anti-Corruption Policy for additional guidance and approval requirements.

We should never give or accept gifts, or anything else of value, if it could appear to influence our judgment or any business decision improperly. Nominal value items, perishable gifts or marketing materials with a company logo are generally not considered improper. Giving or receiving cash or cash

equivalents (such as gift cards that are redeemable for cash or general merchandise, debit cards, or travel vouchers) is not permitted. Submit any exceptions to the Office of Compliance for review prior to taking action.

Personal Relationships

There may be situations where immediate family members, close friends, or those with whom we are in an intimate relationship are employed by Qualcomm, its suppliers, customers, or competitors. In these situations, transparency is important; so, it is necessary 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.



The Way We Build Trust

- [Avoiding Conflicts of Interest](#)
- Avoiding Insider Trading
- Selecting Our Suppliers
- Keeping Honest and Accurate Records
- Representing Qualcomm with Integrity

The Way We Follow the Law

The Way We Engage with the World Around Us

Resources



Outside Activities

We all must dedicate our professional efforts primarily to Qualcomm and refrain from engaging in outside business activities that negatively affect our work for Qualcomm. Outside business activities should be reviewed and, if necessary, approved in advance pursuant to Company policy and/or local regulations. In addition, we are not permitted to pursue business opportunities for ourselves (or for another person or entity) that Qualcomm may be interested in.

For-profit outside board memberships or advisory board service is prohibited unless individuals 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, Chief Human Resources Officer, the Office of Compliance, and the Chief Executive Officer.

Outside Investments

Outside investments are a common aspect of financial planning. However, we should be aware of some potential conflicts. Possessing a significant financial interest in a third party which may influence decisions we make on Qualcomm's behalf is prohibited, as is the acceptance of stock, stock options, or other financial benefits from companies who are doing business with or seeking to do business with Qualcomm. A "significant financial interest" is an ownership interest greater than 5% of the employee's overall stock holdings or ownership of over 5% of the third party's outstanding equity.

Please review the full Conflicts-of-Interest policy for more detailed information. If you believe you may have a conflict situation or have observed a situation where a conflict of interest may be present, contact the Office of Compliance or email conflict-of-interest@qualcomm.com for guidance on how best to navigate the situation. If you have a situation or opportunity that you would like to submit for review and pre-approval, please submit a Conflict-of-Interest Review form via myQ.

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 Relevant Materials You Should Know

- [Conflicts-of-Interest Policy \(go/conflict\)](#)
- [Conflict-of-Interest Review form \(go/conflictreview\)](#)
- [Global FCPA and Anti-Corruption Policy \(go/fcpa\)](#)
- [Conflict-of-Interest Team \(conflict-of-interest@qualcomm.com\)](#)



Code in Action

Your department is vetting a new workflow solution. One of the vendors under consideration to provide the solution offers you a \$100 gift card in appreciation for the time you spent participating in the system demo. Should you consider accepting this offer?

As a general rule, any cash or cash equivalent benefit that is offered to you by a Qualcomm business partner or a vendor that is pursuing Qualcomm's business is prohibited under our Conflicts-of-Interest Policy and should be declined unless you have management pre-approval to accept the gift card so that it can be used for a department raffle or in another way that will benefit the entire department (e.g., order lunch in for the team).

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. Does Qualcomm's Conflicts-of-Interest policy permit this activity?

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 Conflicts-of-Interest Policy, you should submit a Conflict-of-Interest Review form so that the outside activity can be reviewed and a decision made as to whether it is approved.

One of your colleagues boasts to you that she encouraged a Qualcomm vendor that she works with to subcontract portions of their Qualcomm work to a firm that is owned by her brother. Is this something that you should report?

Yes. We must always make objective business decisions and select partners that are best suited for Qualcomm from a cost, schedule, and quality standpoint. It may be difficult for your colleague to be objective about the suitability of her brother's firm. Conducting or encouraging Qualcomm business with relatives or friends (or third parties owned or controlled by relatives or friends) is prohibited, unless expressly authorized to do so by the Company after full disclosure of the relationship. Reporting a concern of this nature allows the Company to take appropriate measures to address the potential conflict, such as ensuring transparency of the relationship, removing the employee with the potential conflict from the selection or management of the third party, or instituting other processes to address the appearance of a conflict of interest. If you are unsure whether a third-party relationship could present a potential conflict of interest, you can seek guidance from the Office of Compliance, Human Resources, Legal, other management personnel. Each of us is responsible for reporting known or suspected violations of the Code to the Company.

Avoiding Insider Trading

Insider trading happens when a person trades in a security (e.g., purchase/sale of stock, options, or other derivative instruments) while in possession of “material non-public information.” Material non-public information is information about a company that is not available to the investing public and 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 United States federal securities laws (and similar laws in many other jurisdictions), 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, our Inside Trading Policy prohibits us from engaging in short sales, buying or selling publicly traded options (even if you own the underlying shares), or engaging in other derivative transactions, involving Qualcomm stock (“Prohibited Transactions”). This prohibition applies regardless of whether the transaction involves the use of material non-public information.

Certain individuals who are frequently in possession of material non-public information about Qualcomm are considered “Designated Insiders” under our Insider Trading Policy and are subject to regular quarterly blackout periods (also known as trading windows). If you are considered a Designated Insider, you will be notified of your status as such and you will be notified upon the opening and closing of the trading windows. However, please note that all of us working at Qualcomm (not just Designated Insiders) are subject to the Insider Trading Policy, including the prohibitions on trading while in possession of material non-public information or engaging in Prohibited Transactions.

Contact Legal or the Office of Compliance for guidance in this area.



 Relevant Materials You Should Know

- Insider Trading Policy ([go/insider](#))
- Insider Trading FAQs ([go/insidertradingfaqs](#))
- Insider Trading Team (insidertradingquestions@qualcomm.com)
- Legal ([EmploymentLegal@qualcomm.com](#))

Avoiding Insider Trading (continued)



Code in Action

You believe that Qualcomm's stock has been consistently undervalued by the market, given the Company's strong performance and many growth opportunities. You are further convinced of this after hearing from a colleague that Qualcomm's earnings for the current quarter will exceed analysts' expectations. Can you buy shares of Qualcomm stock on the open market? What about buying options on Qualcomm stock?

Neither transaction is permissible. While you are generally permitted to buy Qualcomm stock on the open market, you may not do so at any time that you are aware of material non-public information. Information regarding Qualcomm's financial performance (prior to its public announcement) is generally considered material. You are never permitted to buy or sell options or other derivative securities involving Qualcomm stock (regardless of any information you possess).

You are assisting with the due diligence process for Qualcomm's acquisition of a smaller public company, which has not been announced. Your role in the transaction is limited and you do not have many details - for example, you do not know how much Qualcomm will pay for the company. Can you still sell Qualcomm RSU/ESPP shares during this time? Can you buy shares of the target company, given your limited knowledge of the transaction?

Whether you can sell Qualcomm RSU/ESPP shares depends on whether the potential acquisition is considered material to Qualcomm. When in doubt, you should check with the Legal team working on the transaction or contact insidertradingquestions@qualcomm.com. Even if buying shares of Qualcomm is permitted because the transaction is not material to Qualcomm, it may still be impermissible to buy the shares of the acquired company, as an acquisition is generally considered material for the company being acquired, regardless of the amount paid.

Examples of information that could potentially be material, non-public information include:

- Financial performance, including earnings or guidance (prior to public announcement).
- Significant mergers, acquisitions, joint ventures, or divestitures.
- Events regarding a company's stock, stock splits, dividend announcements, or new equity or debt offerings.
- Contracts, orders, design wins or losses, partnership arrangements, product developments, or technology advancements that are likely to have a major impact on the company.
- 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.
- Other events that could be viewed as having a significant impact on the company – e.g., cybersecurity incidents.

- Avoiding Conflicts of Interest
- Avoiding Insider Trading
- **Selecting Our Suppliers**
- Keeping Honest and Accurate Records
- Representing Qualcomm with Integrity

 Relevant Materials You Should Know

- Insider Trading Policy ([go/insider](#))
- Insider Trading FAQs ([go/insidertradingfaqs](#))
- Insider Trading Team (insidertradingquestions@qualcomm.com)
- Legal ([EmploymentLegal@qualcomm.com](#))

Selecting Our Suppliers

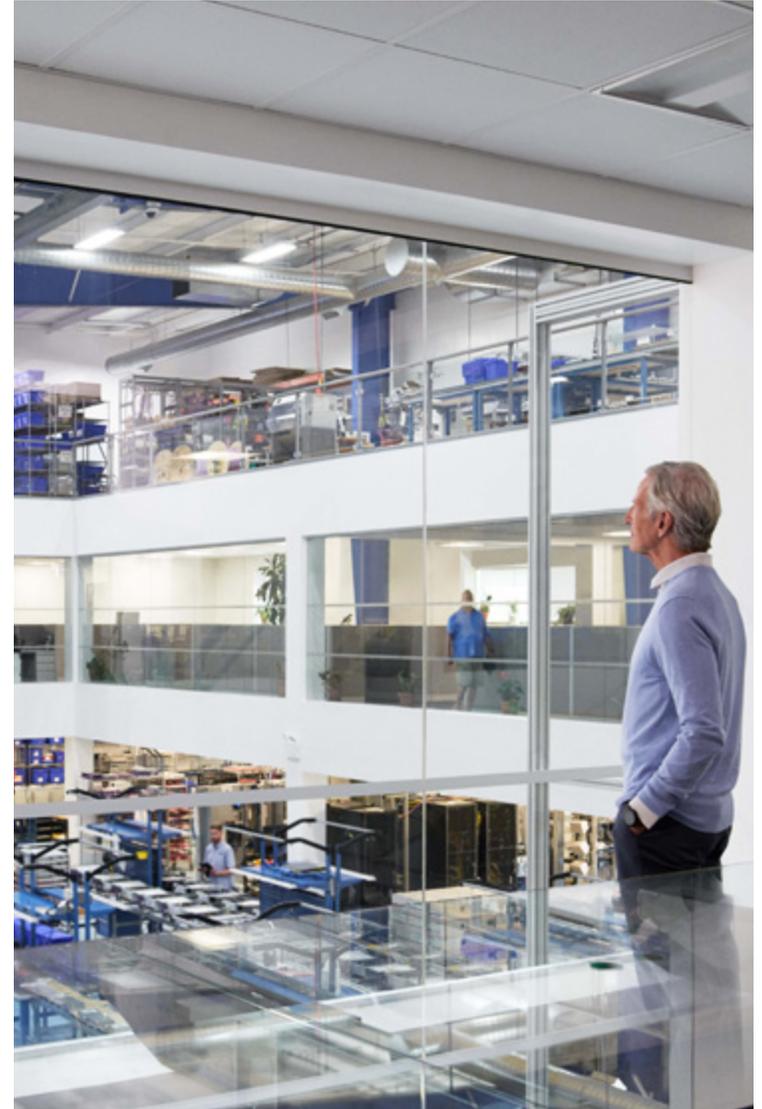
An open, honest, and fair partner selection process allows us to build supplier relationships based on mutual trust and ensure that the Company's best interests are pursued.



Lead the Way

We choose suppliers and vendors who stand behind the quality of the products and services they provide and abide by 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 directly or indirectly solicit or 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 regarding labor, health and safety, environmental, ethics, and management expectations of our suppliers.



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Relevant Materials You Should Know

- Conflicts-of-Interest Policy ([go/conflict](#))
- Procurement Homepage ([go/procurement](#))
- Sustainable Supply Chain Management ([go/supplychainmanagement](#))



Complying with Anti-Money Laundering Laws

Anti-money laundering laws are 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.



Code in Action

You are a decision maker on a large software contract with a company where you are aware that your manager's spouse is the VP of Sales and will benefit if the deal is signed. Should you continue to be involved in the selection process?

It depends. If the supplier was sourced without any involvement from your manager, then there may not be an issue. However, it would be best to be transparent about the relationship by reporting it to your department head and an HR representative to avoid even the perception of a conflict. Although you may be prepared to make an objective decision, your manager's relationship to one of the suppliers could give the appearance of impropriety or inadvertently influence your judgment in the selection process. By disclosing the potential conflict, you provide transparency so the situation can be reviewed in advance of a final selection, and you enhance your credibility in the process.

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 in addition to providing a snapshot of our Company's operations and financial standing. Qualcomm also uses these records internally to make important business decisions.



Lead the Way

Our Company records should always be complete, accurate, and understandable. We never make false or misleading 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, policies, and procedures.

Contract Compliance

All contractual commitments should be in writing and uploaded into our contract management database pursuant to Company policies. We must also be careful not to make business commitments outside of what is documented in these contracts, through informal agreements, oral or otherwise.

Record Retention

We retain books and records in accordance with relevant Company policies and procedures. Specifically, the Company's retention schedule takes into account applicable law, business processes, industry standards, and other agreements, like those with works councils. Documents required for an audit, investigation, or other legal action should be retained as instructed by internal legal counsel.

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.

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-  Relevant Materials You Should Know
 - Contract Management Policy ([go/contracts](#))
 - Approval Policy ([go/approvals](#))
 - Global Travel Policy ([go/travelpolicy](#))
 - Qtime Portal ([go/qtimeportal](#))
 - Export and Sanction Compliance Website ([go/exportandsanctionscompliance](#))
 - All Policies ([go/policies](#))



Code in Action

You finalized a contract with a long-time vendor for integrating a new data analytics solution. All payments in the contract are tied to specific project deliverables, as this is Qualcomm's preferred payment structure for this type of work. One of the executives from the vendor company contacts you to see if you would agree to pay thirty percent of the contract payments now at the start of the project. This would help them cover some of the overhead costs that will be required to ramp up technical resources to support the project. 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?

No. We 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 is prohibited and a violation of our Code. It can undermine Qualcomm's rights and put contract funding and deliverables at risk.



Each of us is responsible for ensuring that information is recorded fully and accurately in Company documents, including, but not limited to information provided in:

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

The Way We Build Trust

- Avoiding Conflicts of Interest
- Avoiding Insider Trading
- Selecting Our Suppliers
- Keeping Honest and Accurate Records
- [Representing Qualcomm with Integrity](#)

The Way We Follow the Law

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Relevant Materials You Should Know

- Digital & Social Media Policy ([go/socialmedia](#))
- Disclosure Policy ([go/disclosure](#))
- Legal (EmploymentLegal@qualcomm.com)
- All Policies ([go/policies](#))

Representing Qualcomm with Integrity

We represent Qualcomm honestly, fairly, carefully, and we do the right thing, always.



Lead the Way

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

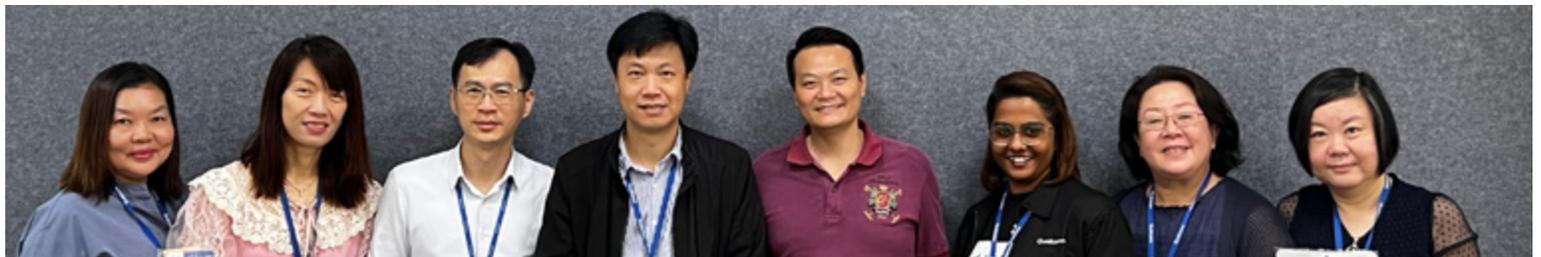
Business Relationships. We abide by the agreements and contracts we have entered into and aim to resolve any disputes in a positive and constructive manner.

Interacting with the Media and Speakerships. Only a limited number of individuals are authorized to make public statements about Qualcomm. Speaking opportunities where you are going to speak about or on behalf of Qualcomm should also be approved through Corporate Communications. Whenever speaking about Qualcomm, our products or business, we are truthful, accurate, and not misleading.

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 discretion and consider the permanence of what you write, even when using Qualcomm's confidential and secure email and messaging systems. Never disclose or discuss Company confidential information on social media sites or email or other messaging platforms, unless they are approved in advance by the Company. Please refer to the Digital & Social Media Policy for more information.

Government Officials, Audits, and Investigations. If asked to provide information in connection with Company investigations, audits, or other legal matters, you should immediately contact the Legal Department. Legal will coordinate with other Company departments to ensure that Qualcomm's response is accurate, clear, truthful, and provided in good faith.

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



Letter from Our CEO

Qualcomm Values

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The Way We Protect
Our Tools for Innovation

The Way We Build Trust

The Way We Follow the Law

- Competing the Right Way
- Preventing Bribery and Corruption
- Export, Sanctions, and Import Compliance
- Following Industry Laws and Regulations

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with the World Around Us

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The Way We Follow the Law

We operate within the law wherever we do business, and we are each responsible for ensuring that the Company abides by applicable laws.



Competing the Right Way

Qualcomm engages in vigorous competition in accordance with applicable law. We sell our products and services on their merits, not by unlawfully limiting competition or obtaining competitive intelligence in an unlawful or unethical way.



Lead the Way

When promoting Qualcomm's products and services, we always act with personal integrity, 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.

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.
- Agree to inappropriate restrictions regarding hiring.

Competitive Intelligence

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

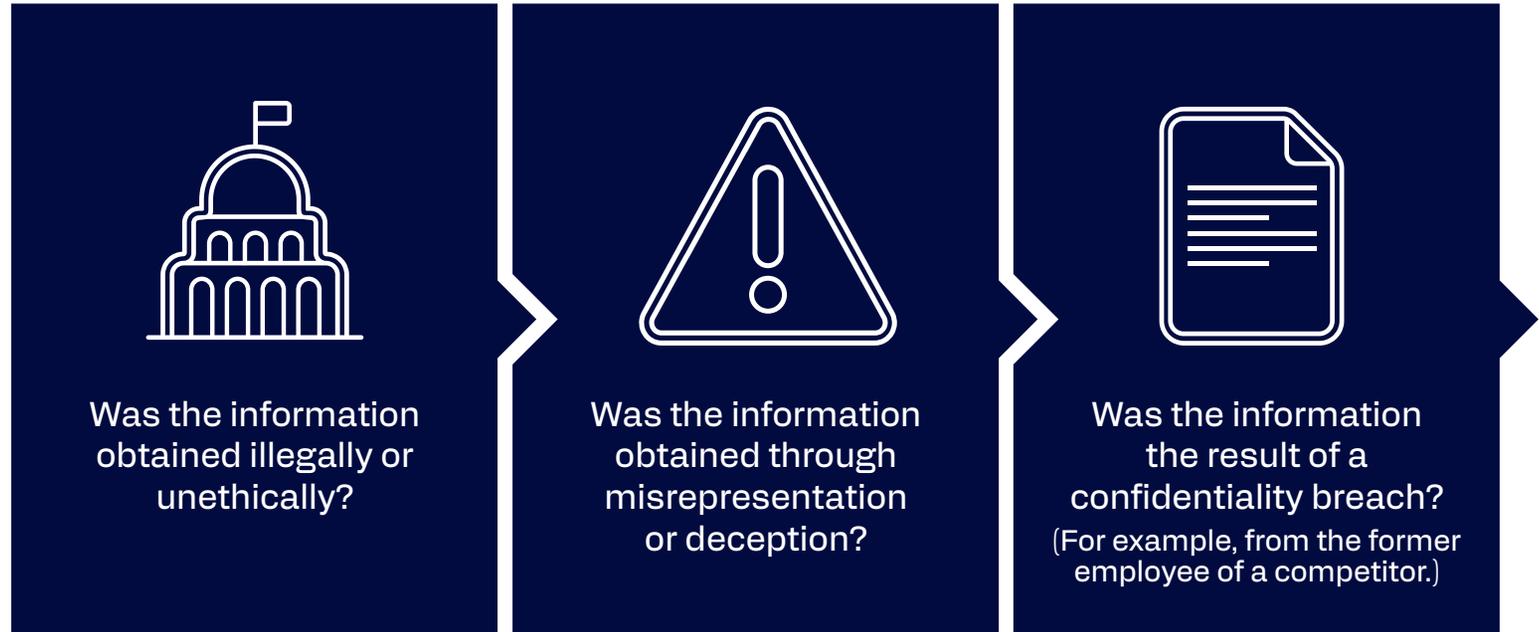
Even if there is no formal written agreement, the mere exchange of confidential information (e.g., price related information, customers' requirements, product roadmaps, our intention to bid or not bid for a certain opportunity) with competitors can create the appearance of an informal understanding.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

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 Legal. 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.



Which Way?

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



NO to all questions: GO! This information was obtained The Qualcomm Way.

YES to any question: 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.



Code in Action

Qualcomm is considering an acquisition of a small company developing a product that could compete with some Qualcomm products. You have been selected as part of a clean team who is not involved in Qualcomm’s relevant products to conduct detailed due diligence about the potential target’s products and development projects. After you finished your diligence efforts, a colleague outside the clean team asked if you could share anything you’ve learned. What should you do?

If the colleague is part of the team working on this potential transaction, you may share a clean team report that has been approved by antitrust counsel. Otherwise, you should not share any information obtained in due diligence with colleagues who are not part of the deal team, especially colleagues who are working on Qualcomm’s relevant products.

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?

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

In response to your job posting, you receive an application from someone who is also applying for a job at a competitor. Your counterpart at the competitor, who is also your friend, calls you to request that you not hire the applicant as a personal favor. Should you say yes?

No, and you should immediately alert Qualcomm’s Employment Legal team.

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

No. We respect other companies’ confidential and proprietary information, including our competitors. If there are any questions about using third-party information, contact the appropriate attorneys within our Legal Department before copying, using, or disclosing the information.

Preventing Bribery and Corruption

We are committed to conducting business with integrity, following ethical business practices, and adhering to applicable anti-corruption laws throughout the world, including the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act (UKBA), and other anti-corruption laws in the locations where we do business.



Lead the Way

- **Do not offer, give, or accept bribes.** We must not offer, give, or accept bribes to or from any individual, regardless of whether that individual is a Government Official or a private party, to obtain or retain business or secure an improper advantage. Bribes are not limited to the provision of cash or cash equivalents; anything of value — including charitable contributions, employment opportunities, internships, and invitations to events — could be considered a bribe under applicable anti-corruption laws.
- **Third parties must not offer or pay bribes of any kind.** Any person or company working on Qualcomm's behalf must not offer, give, or receive a bribe. Qualcomm and individuals may be held responsible for improper payments made by third parties who act on Qualcomm's behalf, even if Qualcomm or the individual did not direct or have knowledge of the corrupt payment. Before engaging a third party that will be interacting with government or public officials on Qualcomm's behalf, contact the Office of Compliance to evaluate whether we need to conduct additional due diligence.
- **Facilitation payments are strictly prohibited.** Facilitation Payments are small payments of cash or something of value made to individual Government Officials to secure or speed up routine, non-discretionary governmental actions; they are commonly called "facilitation" or "grease" payments. These payments are illegal in many countries and prohibited under our FCPA Policy.
- **Understand your responsibilities under our Global FCPA and Anti-Corruption Policy (FCPA Policy).** The FCPA Policy sets forth our responsibilities for complying with worldwide anti-corruption laws. Contact the Compliance team via email at fcpa.help@qualcomm.com if you have questions or would like guidance regarding your responsibilities or the application of the policy.



Code in Action

You have been working on a special project with an employee of one of our business partners in a state-owned entity in China. The employee you are working with mentions that his son is moving to the U.S. and is interested in a position that Qualcomm has posted on its website. He asks if you could reach out to the hiring manager and put in a good word for his son. He tells you that in return, he will provide positive feedback to his employer regarding Qualcomm’s performance on the project that you are working on, to ensure Qualcomm is considered for future business. Is it acceptable for you to reach out to the hiring manager and put in a good word for the employee’s son?

No. The employee you are working with is considered a “government official” under the FCPA due to his employment with a state-owned entity. Helping the employee’s son get a job with Qualcomm could be considered a bribe under the FCPA and would therefore violate Qualcomm’s FCPA Policy. Even if the government official did not promise to put in a good word for Qualcomm with his employer if you agree to support his son as a candidate for employment, such a quid pro quo arrangement may be implied. Bribery is strictly prohibited regardless of involved parties’ government affiliation. If you encounter a similar request or situation, please contact the Office of Compliance for guidance before taking action.

A “bribe” can be anything of value, including cash, cash equivalents, gift cards, gifts, paid travel expenses, entertainment, favors, services, internships/employment, a donation to a favored charity, or loans, if offered to improperly influence a business action or decision.



Compliance red flags:

- Consulting agreements that do not contain defined deliverables.
- Offers or requests to/from a business partner for lavish entertainment or luxury gifts.
- Sponsorships of Government Officials to attend hospitality events that are not business focused.
- Requests from sales agents for excessive sales discounts without clear business justification.
- Vendors or suppliers requesting payments be made to an alternate third-party.
- Employment offers to individuals referred by government-affiliated business partners, or related to Government Officials.

Reporting

Immediately report any concerns relating to bribery or any other violation of our FCPA Policy directly to the Office of Compliance.

Penalties

Violation of our FCPA Policy could result in civil and criminal liability for the individuals involved and the Company, as well as disciplinary action, up to and including dismissal. Anyone who violates this Policy may be subject to termination of all commercial relationships with Qualcomm.

Export, Sanctions, and Import Compliance

As a global Company, Qualcomm is subject to export control, economic sanctions, 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 may apply to the same export and import transactions. Failure to comply with relevant laws can severely impact our business and lead to significant fines, penalties and/or loss of export privileges.



Lead the Way

At Qualcomm, we follow applicable trade-related laws of the countries where we operate with the support of both our Export & Sanctions Compliance (ESC) and Import Compliance teams. Qualcomm's robust policies and procedures on export, sanctions, and import compliance apply globally to everyone at all of our offices.

originating from those sources. Qualcomm will not engage in business with those persons, entities, or places subject to these sanctions unless prior governmental authorization is granted or otherwise available. Sanctions may restrict activities such as transfers of assets, monetary payments, provisions of services, exports of sensitive technology to the affected parties, and purchases of goods and services.

Key current targets of U.S. Export and Sanctions Laws include Cuba, Iran, North Korea, Syria, and the Crimea and other regions of Ukraine controlled by the Russian Federation. The U.S. government also has imposed extensive restrictions on Belarus, the Russian Federation and Venezuela, among others. Visit Export and Sanction Compliance website for a complete and current list of restricted countries.

Export Controls and Economic Sanctions

- **Export Controls.** Qualcomm complies with all applicable export control and economic sanctions laws and regulations ("Export and Sanctions Laws") of the U.S. and countries where Qualcomm conducts business. There are four (4) major categories of exports: physical (e.g., shipments and hand-carries), electronic (e.g., emails, technology, source code, and software downloads and distribution), visual, and verbal (support and services). The U.S. Export and Sanctions Laws also apply to reexports (i.e., from one country outside of the U.S. to another) and in-country transfers, and to releases of technology to non-U.S. nationals.
- **Economic Sanctions.** Economic sanctions are measures that prohibit or restrict dealings with certain countries, territories, individuals, and entities, as well as certain goods and services

Anti-Boycott Laws

U.S. Anti-Boycott laws prohibit everyone at Qualcomm from participating in other countries' boycotts that the U.S. government does not endorse, most notably the Arab League Boycott of Israel. Other countries may have similar rules.

If your job involves any interactions with non-U.S. individuals or companies and cross border activities between multiple countries, understand your responsibilities on how to properly conduct the activity and follow established policies and procedures. This includes using approved processes and systems to maintain compliance with applicable Export and Sanctions Laws.

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 - Competing the Right Way
 - Preventing Bribery and Corruption
 - [Export, Sanctions, and Import Compliance](#)
 - Following Industry Laws and Regulations
- The Way We Engage with the World Around Us
- Resources



Relevant Materials You Should Know

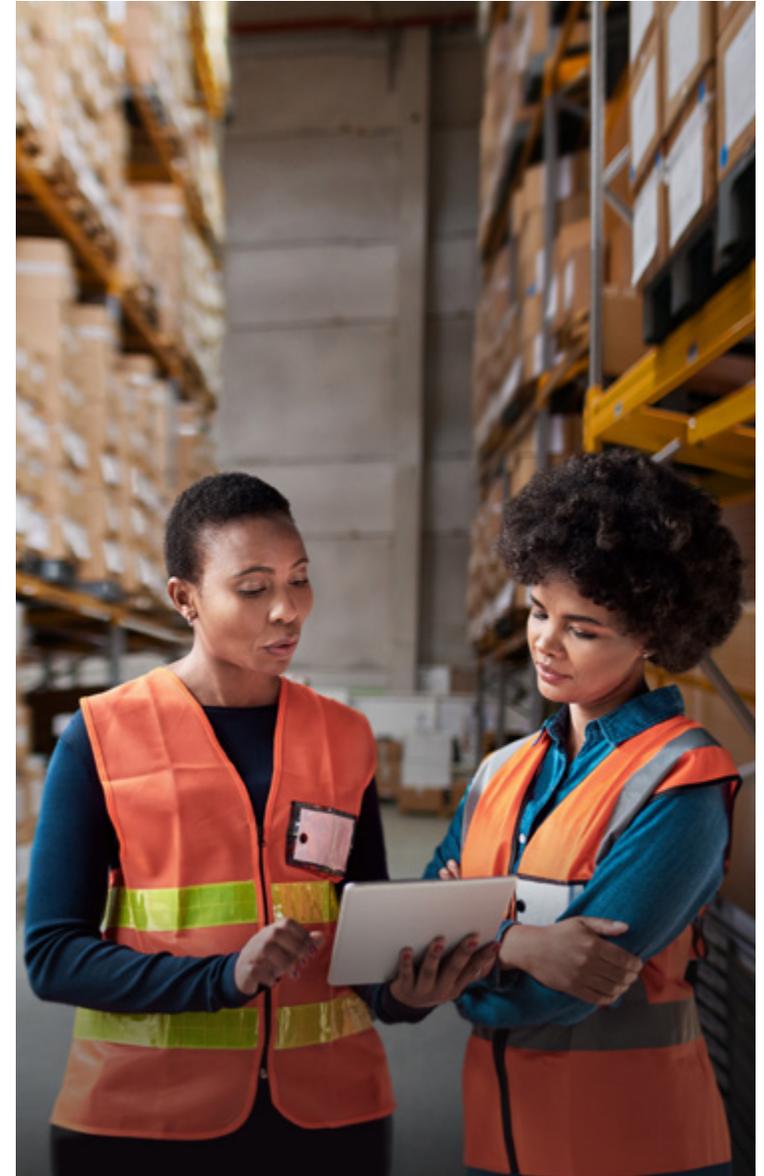
- [Export and Sanctions Compliance \(go/exportandsanctionscompliance\)](#)
- [Hand Carry Policy \(go/handcarry\)](#)
- [Import Compliance \(go/import\)](#)
- [Shipment Policy \(go/shipmentpolicy\)](#)
- [Supply Chain Security \(go/scs\)](#)
- [Indirect Tax Resource Center \(go/indirecttax\)](#)

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 Company products or Company-owned items, understand your responsibilities on properly conducting the activity and following established policies and procedures. Refer to Qualcomm's Shipment Policy 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, 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, ensure you are following the procedures managed by the Tax and Trade Department.

Supply Chain Security

- Qualcomm participates in formal Supply Chain Security government programs that help ensure integrity and security of our goods from origin to destination. Supply Chain Security at manufacturing and non-manufacturing sites is governed by an internal framework overseen by the Import Compliance Department with designated site leads responsible for implementation.
- If your job involves the movement of goods, understand your responsibilities for conducting proper review of the activity using established policies and procedures.



Following Industry Laws and Regulations

As Qualcomm expands into different industries with diverse 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 applicable regulatory requirements that apply to our products and services in the countries where we operate. Regardless of location, we are all responsible for following 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 pursuing or contracting for work with the government, it is your responsibility to know and follow the rules that apply to that engagement and any resulting work. Before entering into discussions that might result in contractual dealings with the United States Government or a contractor acting on behalf of the United States Government, you should consult with the QGOV Legal Department to ensure that we abide by all applicable laws and regulations.



Letter from Our CEO

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with the World Around Us**

- Protecting Our Environment
- Upholding Human Rights
- Participating in Political Activities
- Giving Back to Our Communities

Resources

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're committed to changing the world--- through innovations in technology and through our efforts to do business more responsibly and sustainably.



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The Way We Engage with the World Around Us

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Resources

 Relevant Materials You Should Know

- [Qualcomm Corporate Responsibility webpage \(go/corporateresponsibility\)](#)
- [Operating Sustainably \(go/operatingsustainably\)](#)
- [Product Responsibility \(go/productresponsibility\)](#)
- [Environmental Responsibility \(go/environmentalresponsibility\)](#)
- [Environment, Health and Safety Policy \(go/environmenthealthandsafety\)](#)

Protecting Our Environment

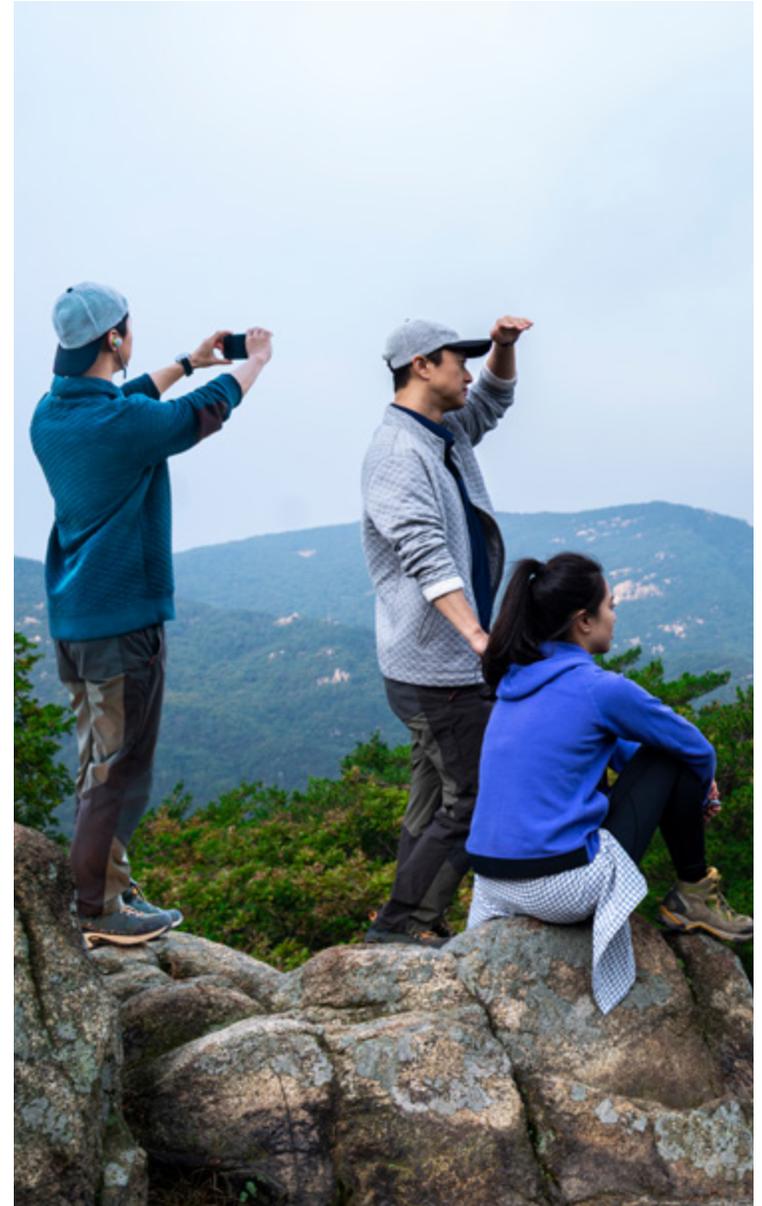
At Qualcomm, we are committed to minimizing impacts to the environment throughout our business. We build environmentally conscious practices into our business operations, processes, and product designs, and comply with all applicable environmental laws and regulations.



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 chemical substance elimination initiatives, we address the environmental, safety, and health impacts of our products and operations.
- We have a goal to achieve net-zero global emissions by 2040, and we aim to conserve water and reduce waste even as we expand our operations.



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, contract, and temporary workers, students, 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.

It's important to raise concerns and report potential human rights violations through appropriate channels. We are committed to providing remedies for individuals or communities where we have identified that Qualcomm, or third parties acting on our behalf, have caused or contributed to adverse human rights impacts. As such, we have a formal, third-party operated grievance and remedy mechanism, our Business Conduct Hotline.



Code in Action

An individual claiming to work at one of our suppliers emails you with a message about long working hours and retention of his identity documents. You do not know this individual, and are not familiar with the company he is working for. What should you do with the email?

Do not ignore the email. You should forward the email to ethics.mail@qualcomm.com so that the issue can be investigated. The Qualcomm Way and our Supplier Code of Conduct prohibit forced labor of any kind and state that all work should be voluntary. Part of our responsibility is to alert the Company when we know or suspect that one of our employees, agents or suppliers is not acting in a manner consistent with our policies.



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 Relevant Materials You Should Know

- [Universal Declaration of Human Rights](#)
- [ILO Declaration on Fundamental Principles and Rights at Work](#)
- [UN Guiding Principles on Business and Human Rights](#)
- [RF360 Europe Human Rights Statement](#)
- [Human Rights Statement \(go/humanrights\)](#)
- [Supplier Code of Conduct](#)

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Relevant Materials You Should Know

- [RF360 Europe Addendum to Supplier Code of Conduct](#)
- [Policy on Responsible Sourcing of Minerals](#)
- [Supply Chain Management](#)
- Corporate Responsibility ([go/corporateresponsibility](#))
- Business Conduct Hotline ([go/hotline](#))
- Legal ([EmploymentLegal@qualcomm.com](#))



Lead the Way

Our approach to these issues adheres to the articles enshrined in the Universal Declaration of Human Rights, the International Labour Organization (ILO), Declaration on Fundamental Principles and Rights at Work, 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, and we require our business partners to do the same.
- We prohibit the use of child labor in our own operations and those of our suppliers. The term “child” refers to any person under the age of 15, under the age for completing compulsory education, or under the minimum age for employment in the applicable country, whichever is greatest. We will never knowingly use any suppliers who engage in child labor, nor will we ever condone such practices.
- We prohibit forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, enslaved labor, or trafficking of persons. All work is voluntary, and we are free to terminate employment at any time, in accordance with local law. We will never knowingly use any suppliers who engage in forced or slave labor, nor will we ever 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.
- We strive to reduce the potential for manipulation and misuse of our information technology systems to cause adverse human rights impacts, and we do not support our technology being used in this way. As such, we seek to detect and investigate security incidents and to prevent their recurrence.
- We work with our suppliers to ensure responsible sourcing of certain metals present in our products, including those responsibly sourced metals from the Democratic Republic of the Congo (DRC), adjoining countries of the DRC, and other conflict-affected and high-risk areas.
- We require our suppliers to acknowledge and implement the Qualcomm Supplier Code of Conduct and RF360 Europe Supplier Code of Conduct Addendum, which provide clarity regarding our labor, human rights, health and safety, environmental, ethics, and management expectations of our suppliers.

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. Qualcomm will not pressure or coerce employees to make personal political contributions or take retaliatory action against those who do not.



Code in Action

You have been approached by a politician that you know, who recognizes that you work at Qualcomm, a prominent company in San Diego. He believes the Company’s backing could positively impact his campaign. He has asked if you could influence the Company to provide a donation or other support for his campaign. Should you act on his request?

No. You should direct the inquiry to Government Affairs. This group is responsible for developing the Company’s legislative and federal, state and local government relations and advocacy strategy and any affiliated political donations.



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.



Code in Action

A charity you support has requested an in-kind donation (product donation) from Qualcomm. What should you do?

In-kind donation requests are approved based on equipment availability, in your region, to eligible non-governmental organizations (NGOs) / charity organizations. You should not make any written or verbal commitments without the proper approvals.

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Resources

Relevant Materials You Should Know

- [In-Kind Donation Process \(go/inkind\)](#)





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](#)) 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 ([go/myQ](#))
- Legal (EmploymentLegal@qualcomm.com)
- Office of Compliance (Office-of-Compliance@qualcomm.com)
- Ethics.mail@qualcomm.com
- COBC@qualcomm.com
- Business Conduct Hotline ([go/hotline](#))

Our Business Conduct Hotline is a 24-hour resource available for you to ask questions or share 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](#) or email the Office of Compliance at Office-of-Compliance@qualcomm.com.



Qualcomm

www.qualcomm.com

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