

QUALCOMM INCORPORATED

CODE OF ETHICS

1. Application and Purpose

This Code of Ethics (this "Code") shall apply to all QUALCOMM Incorporated ("QUALCOMM" or the "Company") employees, including the Company's Executive Officers (as defined under Nasdaq listing standards), and employees of QUALCOMM subsidiaries (collectively, "Employees"), as well as each member of the Company's Board of Directors ("Directors"). Every Employee and Director must be familiar with and understand the provisions of this Code. The purpose of this Code is to promote:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Full, fair, accurate, timely and understandable disclosure in reports and documents that QUALCOMM files with, or submits to, the United States Securities and Exchange Commission ("SEC") and in other public communications;
- Compliance with applicable governmental laws, rules and regulations;
- The prompt internal reporting of violations of this Code; and
- Accountability for adherence to this Code.

The Code establishes a framework for ethical conduct, setting out general principles of behavior and is not meant to cover every situation that may arise. The Company has enacted a Code of Business Conduct and other policies that set out requirements for compliant and lawful behavior.

2. Honest and Ethical Conduct

All Employees and Directors shall perform their duties in an honest and ethical manner. This includes:

- Avoiding situations in which their personal, family or financial interests conflict with those of the Company;
- Refraining from engaging in any activities that compete with the Company, or which may compromise its interests;
- Refraining from taking any business or investment opportunity discovered in the course of employment with or service to the Company that the Employee or Director knows, or should have or has reason to know, would benefit the Company;
- Seeking to avoid misrepresentations of material facts or engaging in unfair dealing with customers, suppliers, business partners, and other third parties;

- Maintaining appropriate confidentiality over material non-public Company and third-party information; and
- Complying with all applicable governmental laws, rules, and regulations.

QUALCOMM encourages Employees and Directors to avoid even the appearance of a conflict of interest and to raise ethical questions, dilemmas, concerns, or suggestions with appropriate individuals within the Company, including supervisors, managers, senior management, or human resources. QUALCOMM has since its inception encouraged escalation of such issues and based upon prior experience, many, if not most, of these issues can be addressed informally, after appropriate discussion and analysis. Any Employee or Director who becomes involved in a situation that gives rise to an actual conflict of interest must promptly inform the Chief Risk and Compliance Officer of such conflict.

3. Full, Fair, Accurate, Timely and Understandable Disclosure

QUALCOMM is committed to ensuring that all disclosures in reports and documents that the Company files with or submits to the SEC, as well as other public communications made by the Company, are full, fair, accurate, timely and understandable. The Company's Chief Executive Officer, President, Chief Financial Officer, and Chief Accounting Officer (with respect to financial disclosures) are ultimately responsible for taking all necessary steps to ensure that this occurs. All Company Employees and Directors shall take appropriate steps within their area of responsibility to ensure the same.

4. Compliance with Laws, Rules and Regulations

The Company expects its Employees and Directors to comply with all applicable laws, rules, and regulations irrespective of location. Violation of the law in conducting Company business are a violation of this Code and other Company policies. This includes, but is not limited to, violations relating to trading in, or making unapproved disclosures of, material non-public information learned in the course of conducting Qualcomm business.

5. Internal Reporting of Code Violations

Any Employee or Director who in good faith believes or suspects a violation of any portion of this Code took place or was not resolved appropriately and does not feel comfortable addressing the issue with their manager should immediately report such violation to the Chief Risk and Compliance Officer or to the Chair of the Audit Committee. The Company will promptly evaluate and/or investigate such reports. Although the Company strongly prefers that any individual who wishes to make such a complaint identify him/herself (to assist in the understanding of the concerns expressed), the Company has created a Business Conduct Hotline ("hotline") where Employees or Directors may confidentially and anonymously (where local country law permits) report known or suspected violations of this Code. To access the hotline, any Employee or Director may call 800-300-3816 in the U.S., or visit <http://qualcomm.ethicspoint.com> or **go/hotline** to do a country search to find a local phone number or submit a concern online. Any person reporting such a violation should be prepared to provide as much detail as possible about the suspected violation, including the individuals involved, the nature of the violation, documentation of the violation, or any other information which may be helpful in the Company's evaluation and/or investigation of the complaint. Prompt disclosure to the appropriate parties is

vital to ensure a thorough and timely evaluation and appropriate resolution. A violation of this Code is a serious matter and could have legal implications. Allegations of such behavior should not be made to embarrass or place anyone in false light or otherwise be made in bad faith. The Company does not tolerate retaliation against anyone who provides information in good faith to the Company or law enforcement concerning a possible violation of any law, rule, regulation, or this Code. Retaliation can lead to disciplinary action, up to and including termination of employment, as well as civil and/or criminal penalties.

6. Consequences for Non-Compliance with this Code

Corrective Actions. Any violation of applicable laws, rules and regulations, or any deviation from the standards embodied in this Code will result in appropriate corrective and/or disciplinary action, up to and including termination of employment. Nothing in this Code requires actions contrary to the law.

Required Government Reporting. Whenever conduct occurs that requires a report to the government, the Chief Risk and Compliance Officer or other applicable Company personnel, under the direction of the Audit Committee, shall be responsible for complying with such reporting requirements.

7. Publication of this Code; Amendments and Waivers

- This Code will be posted and maintained on the Company's website and posting will be disclosed in the Company's Annual Report on Form 10-K, by reference to the Company's proxy statement, if permitted by SEC rules.
- The Annual Report on Form 10-K, by reference to the Company's proxy statement, if permitted by SEC rules, will also contain a statement that amendments to and waivers of this Code that are required to be disclosed by SEC rules or Nasdaq listing standards will be posted on the Company's website.
- Although waivers of this code are not anticipated, any amendment to or waiver of this Code with respect to an Executive Officer or Director shall require approval of the Board of Directors. In addition, any amendment to or waiver of this Code with respect to an Executive Officer or Director shall be disclosed within four (4) business days of such action on the Company's website for a period of not less than twelve (12) months, or in a filing on Form 8-K with the SEC.
- Records of any disclosures relating to waivers of this Code shall be retained for no less than five years.

Approved by the Audit Committee on October 7, 2024