

The United Kingdom Modern Slavery Act 2015 (the “Act”) requires that businesses of a certain size publish a slavery and human trafficking statement disclosing the company’s efforts in the prior fiscal year to address issues related to slavery and human trafficking within its operations and supply chain.

## **QUALCOMM ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT**

This statement is made by Qualcomm Incorporated for itself and on behalf of its group of companies, including but not limited to Qualcomm Technologies International, Ltd. pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps Qualcomm Incorporated (and the subsidiaries named above), referred to collectively as “Qualcomm” have taken to prevent modern slavery and human trafficking in our supply chains and in any part of our operations.

Qualcomm is a global leader in the development and commercialization of foundational technologies for the wireless industry, including 3G (third generation), 4G (fourth generation) and 5G (fifth generation) wireless connectivity, and high-performance and low-power computing including on-device artificial intelligence. At September 24, 2023, we had approximately 50,000 full-time, part-time and temporary workers, the overwhelming majority of which were full-time employees. Our employees are represented by more than 100 (self-identified) nationalities working in over 150 locations in 36 different countries around the world. We conduct business primarily through our QCT (Qualcomm CDMA Technologies) semiconductor business and our QTL (Qualcomm Technology Licensing) licensing business. More information can be found at <https://www.qualcomm.com/company>.

Qualcomm is committed to promoting and respecting all internationally recognized human rights and avoiding complicity in any human rights abuse throughout our Company, our operations and our business relationships, including our subsidiaries, partners, customers and supply chain.

Qualcomm strongly opposes all forms of slavery, child labor, and human trafficking, including forced labor, bonded (including debt bondage) or indentured labor and involuntary prison labor, and will never condone such practices or knowingly use any suppliers who engage in such practices. The [Qualcomm Human Rights Statement](#) elaborates on our values and approach to these issues. Qualcomm utilizes a number of tools to communicate our expectations, analyze risk, conduct due diligence, and verify the absence of such practices in our operations and our supply chain.

[The Qualcomm Way: Our Code of Business Conduct \(“COBC”\)](#) defines our commitment to operating with the highest level of ethical conduct and our dedication to human rights. Our COBC, which Qualcomm provides to all of our employees worldwide, emphasizes the Company’s commitment to ethics, integrity, and electing to work with only those businesses and individuals who share our values. All Qualcomm employees in all countries where we operate are required to complete training on our COBC upon hire and regularly thereafter. Employees must review, acknowledge, and confirm that they will comply with the policies set forth in our COBC.

Qualcomm promotes an Open Door Philosophy in which employees, suppliers and other stakeholders feel comfortable voicing concerns. With a zero-tolerance retaliation policy, Qualcomm actively encourages employees, suppliers, and other stakeholders to raise concerns or suspected COBC violations within our Company. Additionally, Qualcomm maintains a dedicated [Business Conduct Hotline](#), allowing for anonymous reporting, where permitted by law, 24 hours a day, 7 days a week.

Qualcomm regularly conducts formal, third-party human rights impact assessments to determine and prioritize salient human rights risks across our operations and products. Details regarding the latest assessment can be found on our [website](#).

Because Qualcomm primarily relies on third parties to perform the manufacturing and assembly, and most of the testing, of our integrated circuits, our direct operations are extremely low risk for child labor, forced labor, or human trafficking issues. Because of our reliance on suppliers, Qualcomm has placed emphasis on and taken specific steps to address potential human rights risks in our global supply chain as outlined below.

Qualcomm is a full member of the Responsible Business Alliance (“RBA”). The RBA’s purpose is to create and implement industry-wide standards for social, environmental, and ethical responsibility in the supply chain. The RBA has developed a [Code of Conduct](#) that sets forth these standards and is based on international labor, environmental, and human rights standards that prohibit forced labor and human trafficking.

Qualcomm has adopted the RBA Code of Conduct in our own operations and as our Supplier Code of Conduct (“SCoC”). Qualcomm has a [supply chain management website](#), which highlights our expectations for our suppliers and includes links to our supplier code of conduct, purchase order terms and conditions, and Qualcomm’s COBC.

***Supplier assurances.*** Qualcomm expects our suppliers to comply with applicable laws and regulations as well as the SCoC. This is a contractual requirement for all of our direct suppliers. Accordingly, Qualcomm communicates regularly with our suppliers in writing to ensure our expectations are clear with regard to responsible conduct.

***Risk-based supplier assessments.*** As a part of Qualcomm’s supplier management process, the Company assesses our semiconductor manufacturing suppliers to evaluate their conformance to the SCoC. This evaluation includes conducting preliminary risk determinations as well as requiring more detailed supplier self-assessment questionnaires. The results of each method are scored utilizing the scoring system created by the RBA to determine the suppliers’ risk of nonconformance. We annually report on the results of these risk assessments in our Corporate Responsibility Report.

***Supplier audits.*** Depending on the results of the risk assessment, Qualcomm may require an on-site or remote audit of semiconductor manufacturing suppliers to evaluate their conformance to the SCoC and applicable laws and regulations in order to avoid child labor, human trafficking, and forced labor in our supply chain. We review supplier audit results and engage suppliers through Corrective Action Plans when necessary.

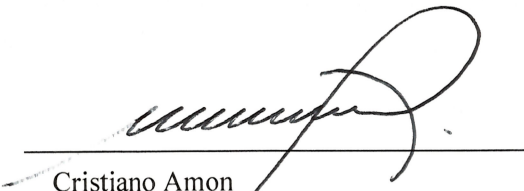
***Training.*** Qualcomm ensures that our suppliers have access to information and training regarding conformance expectations through the RBA learning and capability activities and various other outreach activities.

***Accountability.*** Qualcomm conducts regular business reviews with our semiconductor manufacturing suppliers, and SCoC conformance is often discussed during those reviews. These supplier business reviews provide an optimal venue for accountability with respect to responsible social, ethical, and environmental conduct because of participation from Qualcomm’s senior management and potential business contract impact.

**Qualcomm strongly believes in the necessity of ending human trafficking, forced labor, and child labor and encourages our employees, supply chain, and business associates to join the Company’s commitment to promoting human rights worldwide.**

If you would like to learn more about Qualcomm's approach to human rights and progress in meeting our human rights and corporate responsibility commitments, please visit our [website](#) and download our most recent Corporate Responsibility Report.

This statement covers the financial year ending September 24, 2023, and has been approved by the Board of Directors of Qualcomm Incorporated.



---

Cristiano Amon  
Chief Executive Officer  
Member of the Board of Directors  
Qualcomm Incorporated

Date: March 5, 2024

## **RESOLUTIONS**

RESOLVED, that the Company's UK Anti-Slavery and Human Trafficking Statement FY23 is hereby approved as presented