

# Qualcomm Global Tax Strategy

Qualcomm's commitment to being a responsible corporate citizen extends to its global tax strategy. Our approach to tax is premised on complying with applicable tax laws, maximizing stockholder value and delivering transparent tax reporting and disclosures. The following core principles are fundamental to Qualcomm's tax strategy.

## Overall Approach

Qualcomm's approach to tax is consistent with its Code of Business Conduct and Code of Ethics, which require compliance with all applicable laws, regulations, treaties and other relevant guidance in the jurisdictions in which we operate. We value transparency and provide regular information to our stakeholders, including stockholders, policy makers, employees and the general public, about our approach to tax and taxes paid. We also seek to pay the requisite taxes on profits generated from the activities performed in each jurisdiction.

## Risk Management and Governance

To appropriately manage risk and ensure compliance, Qualcomm employs qualified and competent tax professionals with relevant expertise and experience. We invest in ongoing technical tax trainings and development of our tax professionals, supplementing internal expertise with advice from qualified external advisors. These individuals, as part of our continuous tax reporting and compliance cycle, actively seek to identify tax risks with the aim of evaluating and managing such risks. We monitor changes in tax legislation and practices, continuously assessing the impact to Qualcomm. We account for our tax risks in accordance with applicable accounting standards and have controls in place over our tax reporting processes.

Qualcomm's approach to tax is the responsibility of management, with oversight by its Board of Directors. The Board maintains an Audit Committee with specific oversight of the accounting and financial reporting processes of the Company, including financial statement audits, internal controls and tax reporting. The Audit Committee Charter highlights oversight of the independent auditor, financial information, internal controls, legal compliance and ethics, and other matters including applicable policies, processes and practices, and the financial reporting and control aspects of risk management. The Chief Financial Officer, the Chief Accounting Officer and our Global Head of Tax meet at least quarterly with the Audit Committee, and we provide global tax updates to the Audit Committee at least twice per year. Such oversight and review are essential to managing the Company's risk and delivering on the Company's tax strategy.

## Compliance and Government Engagement

Qualcomm complies with the tax legislation of, and pays the requisite amount of tax in, the jurisdictions in which we operate. Accordingly, we prepare and file all required tax returns providing complete, accurate and timely disclosures to the relevant tax authorities. We do not undertake tax structures without commercial substance, and we employ transfer pricing policies using the arm's length principle. Qualcomm manages and reports taxes in a manner that provides compliance

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across all taxes (e.g., income, sales, indirect), complies with legal and regulatory requirements governing public statements and reports, meets its internal control requirements and supports its business and commercial strategy.

Qualcomm seeks to maintain professional and cooperative relationships with tax authorities. Consistent with our approach to public policy, we proactively engage in areas of tax uncertainty and maintain honest and transparent dialogue throughout the discussions. Qualcomm engages constructively with governments, business groups and civil society to support the development of effective tax systems, legislation and administration.

## Consistency with Business Operations

Qualcomm maintains a tax structure consistent with its business operations. Substantially all of our income is taxable in the United States, where we maintain significant operations, valuable assets and one of our largest employee bases. We do not use so-called “tax havens” in order to avoid taxes on activities that take place elsewhere; our subsidiaries based in low-rate jurisdictions exist for substantive and commercial reasons. Where Qualcomm claims tax incentives offered by government authorities, we ensure such incentives meet the statutory or regulatory requirement and are consistent with the stated policy objectives.