

Global Foreign Corrupt Practices Act (FCPA) and Anti-Corruption Policy

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1.0 All Forms of Bribery are Prohibited

Qualcomm is 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.

Qualcomm prohibits all offers of or the provision of bribes, corrupt payments, kickbacks, and other forms of commercial bribery, regardless of whether the intended recipient is a private individual or a "Government Official" (as defined below). This prohibition includes "facilitation or expediting payments" made to a government official to expedite the performance of a government action, regardless of whether such payments are commonly made in that location.

2.0 Who is a "Government Official"?

A Government Official is any government employee or official, legislator, a political party member (in certain communist countries), candidate for political office, member of a royal family with official governmental responsibilities, employee of a state-owned or controlled enterprise, agents acting on behalf of a government, or any employee or agent of an "instrumentality" of a government. Officials of public international organizations, such as the International Telecommunications Union (including individuals with authority in ITU standards bodies), the United Nations, the World Intellectual Property Organization, or even the International Olympic Committee, are also Government Officials.

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In countries where the economy is controlled by the government, for example, as in China or Vietnam, there are very broad categories of individuals who may be considered Government Officials. You should be aware that many companies in such countries are partially owned, managed, or controlled by the government, and we must treat employees of these companies as Government Officials for purposes of complying with this Policy and the FCPA.

Qualcomm's FCPA website contains a list of known government-owned or controlled companies.

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

3.0 What is a Bribe?

A bribe is anything of value offered or provided – directly or indirectly - to secure an improper advantage or otherwise inappropriately influence the recipient. This includes any payment, gift, promise, favor, or other benefit valued by the person intended to be influenced.

This Policy prohibits inappropriate payments made directly or indirectly. This would include offering or providing anything of value through a third party or from an employee's personal funds.

Anti-corruption enforcement actions have involved bribes in many shapes and forms, such as:

- Monetary payments or cash equivalent benefits such as gift cards, travel or food vouchers;
- Lavish or excessive gifts, meals, entertainment, or travel;
- Charitable donations; or
- Hiring favors.

4.0 Gifts

Qualcomm permits our employees and agents to give and accept business-related gifts of nominal value that are directly related to the performance or execution of a contract or the promotion, demonstration, or explanation of products or services provided by Qualcomm. Whether given or received, gifts must be modest in value and business-related, and they may include items such as a sample of company products (including demonstration devices containing Qualcomm technology or products), recognition plaques, ceremonial or cultural gifts, and similar items. Gifts should never be lavish or excessive, should not violate applicable laws, and should never create an appearance of impropriety. Cash and gifts that are cash equivalent (e.g., shopping coupons, gift cards, or travel vouchers) must never be given. While in certain cultures gifts may be a part of local custom, they may nevertheless be illegal under the FCPA or local laws. Local laws may also impose a reporting obligation on the gift recipient.

Qualcomm has implemented guidelines and procedures to mitigate potential compliance risks related to giving or receiving gifts. Before giving gifts, employees must follow these requirements or contact the Office of Compliance for additional guidance. Before accepting a gift from a Qualcomm partner, employees should refer to Qualcomm's Conflict of Interest Policy for guidance.

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5.0 Meal, Entertainment, Travel and Hospitality Benefits

The Company may provide reasonable and appropriate meal, entertainment, travel, or other hospitality benefits to Government Officials (other than certain U.S. Government Officials) or third-party business partners when it is directly related to the performance or execution of a contract or the promotion, demonstration, or explanation of products or services provided by the Company. Such benefits must always be secondary to the principal business purpose of the expenditure.

Qualcomm has implemented guidelines and procedures to assist employees with compliance requirements when providing meals, entertainment, travel or hospitality to Government Officials or third-party partners. Employees are expected to follow these requirements or contact the Office of Compliance for additional guidance.

6.0 Engaging and Managing Third-Party Business Partners

Qualcomm and its employees may be held responsible for improper payments made by third parties who act on Qualcomm's behalf, even if Qualcomm or the employee did not direct or have knowledge of the corrupt payment.

Qualcomm conducts risk-based due diligence on third-party business partners that may be engaged to (i) act as Qualcomm's agent or intermediary externally for services provided outside of the U.S. or (ii) interact with Government Officials or employees of state-owned enterprises. Examples of these third-party partners include consultants, marketing agencies, construction contractors, customs and logistics service providers, sales distributors, resellers, and system integrators.

In addition to arrangements with third-party business partners described above, there are additional third-party arrangements or transactions that present risks for corrupt activities. These include:

- "Retainer" agreements for services provided outside of the U.S. (where payments to the third-party partner are not tied to specific deliverables);
- Marketing Development Funds;
- Charitable Donations to non-U.S. charities; and
- Agreements with Universities, Professors, or Government Affiliated Research Institutes outside the United States (including gifts, grants, scholarships, fellowships, research projects, etc.).

Qualcomm has implemented guidelines and procedures to assist employees with compliance requirements relating to third party arrangements. Before engaging a third-party business partner or entering into one of the arrangements listed above, employees are expected to follow these requirements to mitigate potential third-party compliance risks. Employees may also contact the Office of Compliance for additional guidance on third-party arrangements.

7.0 Company-Hosted Events

Qualcomm may host events to help build business relationships, educate our business partners on Qualcomm technologies or products, promote networking, and give Qualcomm employees and our business partners the opportunity to spend time together discussing business matters. Examples of

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these kinds of events may include conferences, technical training, workshops, marketing events, strategic planning retreats, or hospitality events. In general, Government Officials may be invited to these events only where the primary purpose of the event is the marketing, promotion, demonstration or explanation of Qualcomm's products or services and any entertainment activities are incidental to the business being conducted.

The Company has implemented guidelines and procedures to mitigate potential compliance risks relating to Company hosted events. Employees are expected follow these requirements or contact the Office of Compliance for additional guidance.

8.0 Sponsorship of External Events

Qualcomm often acts as a sponsor for events organized or presented by third parties to help build business relationships, generate business leads, increase customer engagement, promote brand awareness, and demonstrate goodwill or social responsibility. Examples of these kinds of events may include industry conferences, tradeshow, partner events, technical training, or hospitality events.

The Company has implemented guidelines and procedures to mitigate potential compliance risks relating to sponsorship of external events. If Qualcomm is sponsoring such an event to which Government Officials may be invited, employees are expected to follow these requirements prior to contract execution. Certain U.S. sponsorship agreements maybe exempted from these requirements if they meet certain conditions. Contact the Office of Compliance for additional guidance.

9.0 Employee, Consultant, and Intern Hiring

Qualcomm hires individuals based on their qualifications and ability to perform the responsibilities of the applicable position. Qualcomm strictly prohibits making hiring decisions to improperly influence a Government Official. The Office of Compliance must pre-approve any offer of employment, consultancy, or internship if the reason for extending an offer to the candidate is based, even in part, on the fact that the candidate was:

- referred by a Government Official, or
- is related to a Government Official, including an employee of a state-owned enterprise

The Company has implemented procedures to mitigate potential compliance risks related to hiring. Employees must follow these requirements or contact the Office of Compliance for additional guidance.

10.0 Mergers, Acquisitions, Joint Ventures, and Investments

Qualcomm regularly engages in mergers, acquisitions, joint ventures, and other strategic transactions, such as equity investments. These initiatives may pose both legal and business risks under the FCPA and other anti-corruption laws. In some circumstances, the Company could become liable for bribery and other corruption violations committed by target companies it acquires through a merger or acquisition, or for bribery and other corruption violations committed by a joint venture, a joint venture partner or a company in which it makes an investment.

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Before entering into a prospective merger, acquisition, joint venture, or making an investment that does not meet the criteria established for our traditional ventures investments, the business sponsor must contact the Office of Compliance to review the transaction and ensure that adequate anti-corruption due diligence is completed.

11.0 Accurate Books & Records

Qualcomm must keep books and records that accurately detail and fairly reflect what is done with Qualcomm's resources. All relevant records (including invoices, expense reports, contracts, and any other business records) must accurately and thoroughly reflect the transactions at issue.

12.0 Penalties for Violations

Violation of this Policy could result in both civil and criminal liability for the individuals involved as well as the Company.

In addition, the Company may be subject to significant criminal fines and civil penalties; suspension of certain of the Company's business activities; private civil lawsuits from shareholders or competitors; disgorgement of profits; and debarment from certain government agency programs, including export licenses and government and commercial tenders.

Employees who violate this Policy may be subject to disciplinary action, up to and including dismissal. Agents who violate this Policy may be subject to termination of all commercial relationships with Qualcomm.

13.0 Employee Responsibilities

- Observe the highest ethical standards in your work for the Company.
- Be familiar with the Company's policies and procedures, strictly comply with them, and assist in enforcing them.
- Seek guidance from Legal or the Office of Compliance when you have questions about the applicable law or this Policy.
- If you wish to provide any benefit to a Government Official or any other third-party business partner, ensure that the benefit is clearly for a purpose permitted by this policy.
- Immediately report to the Office of Compliance if any Government Official or third-party business partner requests or suggests payments or benefits that may be prohibited by this Policy.
- Report promptly to the Office of Compliance if you become aware of any potential violation of the FCPA. You may also use the Company's "[Business Conduct Hotline](#)" to report any potential violation of the FCPA (anonymously, where permitted by law, if you choose).
- Contact the Office of Compliance for guidance **in advance** if you are uncertain whether a payment or a conduct may violate this Policy, the FCPA or any other laws.

14.0 Advice Regarding this Policy

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It is Qualcomm's policy to comply with all applicable laws in general and all anti-corruption laws in particular. Should you require assistance in complying with this Policy and understanding how it may apply to certain situations, please contact the Office of Compliance or Corporate Legal Department. You are encouraged to seek advice before engaging in any conduct that may be in violation of this Policy.

15.0 Retaliation Is Not Tolerated

Qualcomm is committed to ensuring lawful and ethical conduct, and therefore will not retaliate – and will not tolerate retaliation – against any individual for raising a question, concern, or complaint regarding these matters in good faith with management, HR, Compliance, Legal, Internal Audit, Finance, or the [Business Conduct Hotline](#), or for participating in the investigation of any such complaint.