# Qualcomm Human Rights Statement

*"For more than three decades we have continued to invent technologies that revolutionize the way people live, work and connect. But it's how we make this possible that defines us. No matter the role, all of us play a part in driving the company forward in ways that respect human rights. I am proud that promoting and respecting human rights is a critical aspect of purposeful innovation at Qualcomm."* — Cristiano Amon, Chief Executive Officer

## Our Principles and Approach

We believe human rights are fundamental rights, freedoms, and standards of treatment to which all workers are entitled, including without limitation, women, temporary, migrant, student, contract, and direct employees. We are 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.

Our values and approach to these issues adhere to the articles enshrined in the Universal Declaration of Human Rights, the Core Labor Standards of the International Labour Organization (ILO), the United Nations (UN) Guiding Principles on Business and Human Rights and the UN Global Compact Principles. We are members of the Responsible Business Alliance (RBA) and the UN Global Compact, which further augment our efforts.

We maintain board-level oversight and engagement with senior executives regarding our corporate responsibility priorities, including our human rights statement, practices, and approach. We report on human rights and other activities to our board of directors regularly. We maintain a cross-functional team, our ESG Working Group, with representation from legal, procurement, corporate responsibility, government affairs, environmental, health and safety, human resources, privacy and cybersecurity, supply chain management, investor relations, compliance, and operations, among others, that is responsible for implementing, improving and continuously supporting our adherence to our human rights practices. This group also engages with external stakeholders on our human rights program and strategies.

We regularly conduct formal, third-party human rights impact assessments to determine and prioritize salient human rights risk across Qualcomm's operations and products. We assess manufacturing suppliers and manufacturing sites of subsidiaries to evaluate their conformance to our Supplier Code of Conduct via risk assessments and audits, and work with them to address any non-conformance. Our subsidiaries and manufacturing suppliers, in all of their activities, must operate in compliance with all applicable laws, regulations, and rules of the countries in which they operate. We are committed to conducting ongoing human rights due diligence and monitoring.

## Communication of our Principles

Our human rights statement is referenced in *The Qualcomm Way: Our Code of Business Conduct*, which demonstrates our commitment to operating with the highest level of ethical conduct and our dedication to human rights. We provide *The Qualcomm Way: Our Code of Business Conduct* (CoBC) to all employees worldwide and require that they review,

acknowledge, and confirm that they will comply with the policies that are covered.

Our Supplier Code of Conduct (SCoC) sets out our expectations on human rights and labor, health and safety, the environment, business ethics, and management systems across our supply chain. The standards set out in our SCoC reference international norms and standards. We require suppliers to acknowledge and implement our SCoC in their operations. As a Full Member of the RBA, Qualcomm has also adopted the RBA Code of Conduct.

Our Human Rights Statement and additional information can be found on our corporate responsibility website. We regularly share this information and engage with stakeholders, including suppliers, non-governmental organizations (NGOs), investors, and customers.

## Our Commitments

At Qualcomm, we derive revenues principally from sales of integrated circuit products and licensing our intellectual property. Our integrated circuits and system software are used in wireless devices, such as mobile phones, tablets, laptops, infrastructure equipment, headsets, sound systems and automobiles, and in wired devices, such as broadband gateway equipment, desktop computers, and streaming media players.

To produce our integrated circuit products, we utilize a primarily fabless production model. Therefore, we largely rely on independent third-party suppliers to perform the manufacturing and assembly, and most of the testing of our integrated circuits. Our suppliers are predominantly located in Asia.

In the Information and Communications Technology (ICT) sector at large, salient human rights risks include forced labor, child labor, working hours, women's rights, health and safety, freedom of association and collective bargaining, and responsible sourcing of minerals. With that knowledge, Qualcomm has developed the below commitments that highlight the potential human rights issues most directly related to our Company, operations, and supply chain.

### Respectful Workplace & Equal Opportunity

At Qualcomm, we are committed to a work environment in which employees feel respected and valued. We thrive on the unique and innovative ideas generated by our employees. Their ideas help us to change the world every day. Discrimination or harassment will not be tolerated: instead, we choose to demonstrate respect to each other and collaborate in ways that appreciate our similarities and celebrate our differences. We encourage the exchange of unique ideas and perspectives; we believe that both employees and business results benefit from valuing diverse experience, backgrounds and ideas.

Qualcomm ensures equal employment opportunities for all applicants and employees in all aspects of employment without consideration of race, ethnicity, religion, color, national origin, age, sex, gender, marital status, sexual orientation, gender identity and/or expression, veteran status, disability or any other basis prohibited by law.

### Elimination of child labor, forced or compulsory labor and human trafficking

Forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons are prohibited, and we are always free to leave our employment. Child labor is not to be used in our operations or in any stage of our product manufacture at our manufacturing suppliers and subsidiaries. Although legitimate workplace apprenticeship or

intern programs that comply with all laws and regulations are permitted and supported, we will never knowingly use any suppliers who engage in child, forced or slave labor, nor will we condone such practices.

## Right to exercise freedom of association; collective bargaining agreements and trade unions

We respect the rights of employees to form and join trade unions of their own choosing without fear of intimidation or reprisal, to bargain collectively and to engage in peaceful assembly in conformance with local law, as well as respect the right of workers to refrain from such activities. We protect workers against acts of anti-union discrimination, respect the right of workers to submit grievances without suffering or retaliation and prohibit any acts of interference in trade unions. We provide trade unions representatives with information required for meaningful bargaining in the context of bona fide negotiations.

In locations where the right to freedom of association is restricted by law, we support the development of alternative means to facilitate the representation of employees' interests. We are compliant with all collective agreements regarding significant operational changes as required by country laws and regulations.

We do not tolerate or contribute to threats, intimidation, violence, and physical or legal attacks against human rights defenders, for both our operations and our supply chain. We are committed to supporting human rights defenders' right to freedom of expression, association, and peaceful assembly.

## Workplace health and safety

Qualcomm is committed to a healthy, safe and innovative work environment in which everyone is treated with respect and dignity. Our health and safety management system framework provides clear, consistent and regulatory-compliant policies and protocols for managing health and safety. It describes our standards and specifications for training, safety audits, incident investigation and communications and helps us integrate safety practices in every aspect of our business.

## Anti-corruption

Qualcomm is committed to complying with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), other U.S. laws, and the anti-corruption laws and regulations in the countries where we do business. Qualcomm's Global FCPA and Anti-Corruption Policy applies to all employees.

Qualcomm is committed to anti-corruption compliance, and our compliance program applies to all persons/entities that provide goods or services to Qualcomm. We implement our compliance requirements through contract provisions, purchase order terms and conditions and having our suppliers acknowledge our supplier code of conduct. Qualcomm takes a risk-based approach to compliance and monitors and performs anti-corruption due diligence as necessary on our third-party partners.

## Responsible minerals sourcing

Working with our suppliers, we strive to ensure that the mining of the minerals that end up in our products do not contribute to human rights violations. Our due diligence measures are designed to conform to the Organisation for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Qualcomm has adopted a Conflict Free Minerals Policy, and we expect our suppliers to obtain materials through environmentally and socially responsible sources, including conflict free sources within the DRC and adjoining countries. We also support the Responsible Minerals Initiative through membership, active participation, and financial contributions. Additional information about our program, including our annual Conflict Minerals Report, can be found at: Qualcomm conflict free minerals.

## Privacy, data security, product responsibility and freedom of expression

In our Company, in our products, and the mobile industry, we're working to enhance the security of how we process and store data of all kinds, including personal data. We strive to foster trust in the use of wireless technologies by helping to enable responsible information privacy and data security practices. So that our customers can use our technologies with confidence, we incorporate privacy and security considerations into our products in the earliest stages of design. Through our global privacy and security programs, our employees routinely identify, evaluate, and mitigate potential privacy or data security issues in our products and businesses.

Qualcomm believes information and communication technology is a powerful enabler of freedom of expression around the world. We also believe in robust and secure communications to ensure consumer trust and quality of experience.

We strive to reduce the potential for manipulation and misuse of our information technology systems to cause adverse human rights impacts and 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 continue to devote significant resources to the security of our information technology systems and commit to preventative and corrective actions and pursuing a suitable resolution in cases where we have identified that we, or organizations associated with Qualcomm, have caused or contributed to adverse human rights impacts.

With respect to government surveillance, we understand and value the need to protect citizens, but that should also include protecting citizens' interest in privacy. To that end, there should be reasonable checks and balances on any governments' ability to collect user data. These reasonable limitations will work best when they balance security needs with user privacy and maximize the public's overall trust in the way the technology works. This will also provide certainty for existing and future businesses to invest and innovate.

## Grievance and Remedy

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. The hotline is a comprehensive and confidential reporting tool available for anyone, external or internal, to raise concerns, ask questions or seek guidance anonymously, to the extent permitted by local law. All stakeholders can raise concerns via either toll-free hotline or the Internet, and we strive to respond to all reports in one to two business days. 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.

For more information on Qualcomm's Human Rights Statement, please contact humanrights@qualcomm.com.