

In 2015, the Parliament of the United Kingdom enacted the Modern Slavery Act of 2015 (the “Act”). As its name suggests, the Act is intended to fight against slavery and human trafficking. Among other things, the Act requires that businesses of a certain size publish a slavery and human trafficking statement disclosing the company’s efforts (if any) 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 on behalf of Qualcomm Incorporated and its group of companies (“Qualcomm”) pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps Qualcomm has taken to ensure that slavery and human trafficking is not taking place in its supply chains or in any part of its business.

Qualcomm is committed to respecting human rights and avoiding complicity in any human rights abuse throughout our Company, our operations, and our communities. 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. [Qualcomm’s Commitment to Human Rights](#) elaborates on our values and approach to these issues. Qualcomm utilizes several approaches to communicate our expectations and verify the absence of such practices in our operations and our supply chain.

[The Qualcomm Way: Our Code of Business Conduct \(“COBC”\)](#) demonstrates 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 are required to review, acknowledge, and confirm that they will comply with the policies set forth in our COBC.

Qualcomm works to promote an open door culture in which employees and suppliers feel comfortable voicing concerns. With a zero-tolerance retaliation policy, Qualcomm actively encourages employees and suppliers to raise concerns within our Company. For individuals who still remain uncomfortable making a report, Qualcomm maintains a dedicated [Business Conduct Hotline](#), allowing for anonymous reporting where permitted by law 24 hours a day, 7 days a week.

Qualcomm conducts formal corporate level human rights impact assessments as part of our 2030 Sustainability Vision to ensure that human rights is integrated into all key business decisions. Details regarding the latest assessment can be found on our [website](#).

Because Qualcomm depends on suppliers for the majority of our manufacturing, Qualcomm does not generally encounter issues with child labor, forced labor, or human trafficking in our direct operations. Because of our reliance on suppliers, Qualcomm has placed emphasis on and taken specific steps to address these concerns in our supply chain.

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. 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 RBA Code of Conduct. Accordingly, Qualcomm communicates regularly with our suppliers in writing to ensure our expectations are clear and up-to-date 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 RBA Code of Conduct. 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.

→ **Supplier audits.** Depending on the results of the risk assessment, Qualcomm may require an on-site audit of semiconductor manufacturing suppliers to evaluate their conformance to the RBA Code of Conduct and applicable laws and regulations in order to avoid child labor, human trafficking, and forced labor in Qualcomm's supply chain.

→ **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 the RBA Code of Conduct 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, suppliers, and business associates to join the Company's commitment to promoting human rights worldwide.

If you would like to learn more about our approach to human rights, please visit Qualcomm's [sustainability website](#) and download our most recent [sustainability report](#).

This statement covers the financial year ending September 29, 2019 and has been approved by the board of directors of Qualcomm Incorporated.



Steve Mollenkopf
Chief Executive Officer
Qualcomm Incorporated

March 9, 2020

Date