

The Qualcomm Way

Our Code of Business Conduct

2022 Edition



Qualcomm

Table of Contents

Letter from Our CEO	3	The Way We Build Trust	21
Qualcomm Values	4	Avoiding Conflicts of Interest	22
		Avoiding Insider Trading	24
The Way Our Code Guides Us	5	Selecting Our Suppliers	26
Purpose of Our Code	6	Keeping Honest and Accurate Records	27
Who Follows the Code	7	Representing Qualcomm with Integrity	28
Seeking Guidance and Raising Concerns	8		
The Way We Respect Each Other	10	The Way We Follow the Law	29
Maintaining a Positive Work Environment	11	Competing the Right Way	30
Environment, Health and Safety (EHS)	12	Preventing Bribery and Corruption	32
Workplace Security	13	Export, Sanctions, and Import Compliance	34
Respecting Privacy	14	Following Industry Laws and Regulations	36
The Way We Protect Our Tools for Innovation	15		
Protecting Confidential Information	16	The Way We Engage with the World Around Us	37
Protecting the Power of Ideas	18	Protecting Our Environment	38
Safeguarding Our Electronic Assets	19	Upholding Human Rights	39
Being Responsible with Company Funds	20	Participating in Political Activities	40
		Giving Back to Our Communities	41
		Resources	42

The Qualcomm Way

Letter from Our CEO

At Qualcomm, our commitment to purposeful innovation, passionate execution, collaborative community, and unquestioned integrity underpins everything we do. Through more than three decades of innovation, we have continued to create technologies that revolutionize the way people live, work and connect with each other. But it's how we make all this possible that defines us... that's **The Qualcomm Way**.

We bring **The Qualcomm Way** to life through our culture of invention, our ability to meet every challenge and persevere, and the passion and dedication – both to the company and to each other – of our employees. Along the way, as we meet ethical challenges, our Code of Business Conduct serves as a guide, helping us ensure integrity with everything we do as a company.

Please read and become familiar with the Code. We are all responsible for helping ensure that everyone at Qualcomm does the right thing – always. Our Open Door Philosophy encourages employees to raise any work-related concerns without fear of retaliation. If you have questions or concerns about conduct that you don't think aligns with our values or guidance, reach out to your manager, Human Resources, the Office of Compliance, Legal, our Business Conduct Hotline, or any member of leadership.

Thank you for bringing your talents, energy, and commitment to Qualcomm, and for working together to ensure we always do business **The Qualcomm Way**.

Sincerely,
Cristiano Amon
President & CEO, Qualcomm



Qualcomm Values



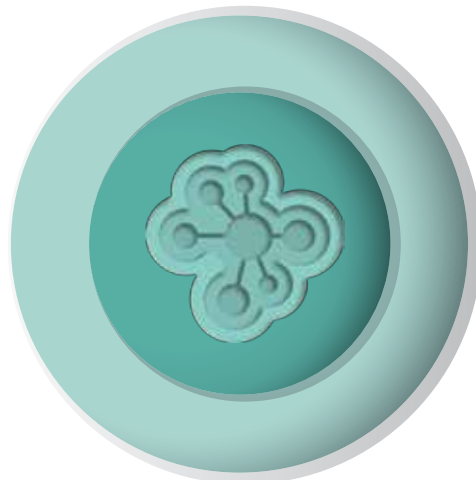
Purposeful Innovation

Raise the Bar
Drive Technology Leadership
Focus on the Customer
Engage Curiosity



Passionate Execution

Ensure Total Quality
Make Decisions Efficiently
Exceed Expectations
Empower People



Collaborative Community

Foster Inclusion & Diversity
Communicate Openly
Leverage Expertise
Be Respectful



Unquestioned Integrity

Do the Right Thing
Take Ownership
Cultivate Trust
Embrace Social Responsibility

The Qualcomm Way

The Way Our Code
Guides Us

The Way We Respect
Each Other

The Way We Protect Our
Tools for Innovation

The Way We Build Trust

The Way We Follow
the Law

The Way We Engage
with the World Around Us

Resources

The Way Our Code Guides Us

Our core values – the fundamental building blocks of our business success – are embedded throughout the guidelines presented in the Code. As we learn more about The Qualcomm Way, we should all seek to behave in accordance with its principles every day.

In This Section

- Purpose of Our Code
- Who Follows the Code
- Seeking Guidance and Raising Concerns



The Qualcomm Way

The Way Our Code Guides Us

- The Way We Respect Each Other
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust
- The Way We Follow the Law
- The Way We Engage with the World Around Us
- Resources

Additional Details

[Code of Business Conduct website](#) (go/cobc)

Purpose of Our Code

Our Code helps us navigate the ethical and legal situations we each face daily and gives us guidance to make good decisions. Ethical conduct should always be at the core of what we do, and we strive to follow the letter and the spirit of our Code, understanding it in the context of our core Company values:

- Purposeful Innovation

Unquestioned Integrity
- Passionate Execution

Collaborative Community

The Code helps guide us in making sound decisions so that we can act with integrity in all that we do. It includes information about:

- Company policies
- Laws and regulations we must know and follow
- Standards for ethical conduct
- Resources for questions or concerns

Violations of our Code, Company policies, laws, or regulations may carry significant consequences including disciplinary action and possible termination. In some situations, the individuals involved and/or our Company may face civil and/or criminal liability for violations.

As changes in our organization and business operations occur, we will reassess and clarify our practices, policies, and procedures. Visit our Code website for the most up-to-date information, including links to policies, procedures, guidance, resources, and contact information.



The Qualcomm Way

- The Way Our Code Guides Us
- The Way We Respect Each Other
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust
- The Way We Follow the Law
- The Way We Engage with the World Around Us
- Resources

Additional Details

Open Door Philosophy
(go/opendoor)

Who Follows the Code

Qualcommers

We are all expected to behave The Qualcomm Way – living and upholding our values every day.

Because Qualcomm operates in many countries, it’s essential to be aware of the different laws, regulations, and business and cultural customs that may apply to our business activities. While we respect the norms of our customers, business partners, and co-workers throughout the world, all employees must, at a minimum, comply with the standards in this Code. In the event you believe the Code is inconsistent with local law, please seek guidance from the Legal Department or email cobc@qualcomm.com.

Managers

- Qualcomm managers have additional responsibilities:
- Lead by example, serve as role models, and communicate support for our values and the principles reflected in the Code.
 - Embrace and encourage our Open Door Philosophy so employees feel comfortable asking questions and raising concerns.

- Set clear objectives that align with our Company values and do not encourage employees to engage in conduct contrary to our values or policies.
- Seek guidance from the Office of Compliance, Human Resources, Legal, other management personnel, or our Business Conduct Hotline on issues of concern or to seek guidance in difficult situations.
- Hold employees responsible for their conduct.

Our business partners

In addition, we expect our suppliers, agents, and business partners to meet the same high standards when working on Qualcomm’s behalf. Please email suppliercode@qualcomm.com for more information.

Our Code at Work

One of your colleagues boasts to you that she encouraged a Qualcomm vendor that she works with to subcontract portions of their Qualcomm work to a firm that is owned by her brother. Is this something that you should report?

Yes. Employees must always make objective business decisions and select partners that are best suited for Qualcomm from a cost, schedule, and quality standpoint. It may be difficult for your colleague to be objective about the suitability of her brother’s firm. Conducting or encouraging Qualcomm business with relatives or friends (or third parties owned or controlled by relatives or friends) is prohibited, unless expressly authorized to do so by the Company after full disclosure of the relationship. Reporting a concern of this nature allows the Company to take appropriate measures to address the potential conflict, such as ensuring transparency of the relationship, removing the employee with the potential conflict from the selection or management of the third party, or instituting other processes to address the appearance of a conflict of interest. If you are unsure whether a third-party relationship could present a potential conflict of interest, you can seek guidance from the Office of Compliance, Human Resources, Legal, other management personnel. Each of us is responsible for reporting known or suspected violations of the Code to the Company.



The Qualcomm Way

[The Way Our Code Guides Us](#)

The Way We Respect Each Other

The Way We Protect Our Tools for Innovation

The Way We Build Trust

The Way We Follow the Law

The Way We Engage with the World Around Us

Resources

Additional Details

[Business Conduct Hotline](#) (go/hotline)

[MyHR](#) (go/myHR)

[Speak Up](#) (go/speakup)

[The Open Door](#) (go/theopendoor)

Seeking Guidance and Raising Concerns

We are all responsible for being familiar with our Code, seeking guidance, and raising concerns. Qualcomm has an Open Door Philosophy, which encourages everyone to feel comfortable speaking up and raising concerns.

Even when we know and understand the Code, there may be times when it is not clear how to do the follow its principles. Or, we may just want confirmation that we are making the right decisions. We have a number of resources in place to seek guidance or raise concerns, including:

- Your manager
- Any member of management
- Human Resources/myHR
- The Legal Department
- Office of Compliance
- Our Business Conduct Hotline

Qualcomm investigates and addresses concerns raised to the Company promptly, professionally, and confidentially to the extent possible. Each of us is responsible for raising concerns and cooperating with investigations.

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. If you know or suspect that you or someone else has experienced retaliation, these concerns should be raised immediately through any of the methods listed above.

Our Business Conduct Hotline

Our Business Conduct Hotline is a 24-hour resource available for you to share questions or concerns. It is administered by a third party and allows you to raise issues anonymously if desired, where local country law permits. When you contact the Hotline, you will be assigned an identification number and security code that you may use to follow up or provide additional information. All reports will be promptly and fully investigated.

The Business Conduct Hotline website can help you find your local phone number or raise a concern via an online tool.



Our Code at Work

You want to raise a concern, but it involves your immediate manager and you are concerned about retaliation. Should you raise it?

Yes. You should raise any concerns you may have. 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. While Qualcomm prefers that employees do not raise their concerns anonymously (to help facilitate a more effective and thorough investigation), our Business Conduct Hotline also allows employees to raise concerns anonymously where permitted by law.

Seeking Guidance and Raising Concerns continued

The Qualcomm Way

The Way Our Code Guides Us

- The Way We Respect Each Other
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust
- The Way We Follow the Law
- The Way We Engage with the World Around Us
- Resources

Additional Details

- [Business Conduct Hotline](#) (go/hotline)
- [MyHR](#) (go/myHR)
- [Speak Up](#) (go/speakup)
- [The Open Door](#) (go/theopendoor)

Qualcomm's Internal Investigation Process



The Qualcomm Way

- The Way Our Code Guides Us
- The Way We Respect Each Other**
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust
- The Way We Follow the Law
- The Way We Engage with the World Around Us
- Resources

The Way We Respect Each Other

Qualcomm ideas are changing the world every day. And these ideas are brought to life by strong teams that work collaboratively, inclusively, respectfully, and with open communication and trust.

Everyone plays a role in creating a positive, safe, secure, and productive work environment, where we can all feel included, empowered, and inspired to do our best.

In This Section

- Maintaining a Positive Work Environment
- Environment, Health and Safety (EHS)
- Workplace Security
- Respecting Privacy



The Qualcomm Way

- The Way Our Code Guides Us
- [The Way We Respect Each Other](#)
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust
- The Way We Follow the Law
- The Way We Engage with the World Around Us
- Resources

Additional Details

- [Diversity, Equity, & Inclusion site](#) (go/DEI)
- [Prohibition of Harassment Policy](#) (go/harassment)

Maintaining a Positive Work Environment

We celebrate the diversity of our workforce and teams, and recognize that our varied backgrounds, experiences, and ideas are pivotal to our success. We are all responsible for fostering a diverse and inclusive workplace.

Qualcomm prohibits unlawful discrimination or harassment.

Lead the Way
We work together to ensure that our workplace is inclusive and respectful, where each of us is valued for our unique experience and perspectives. Our colleagues, job applicants, and business partners should be assessed on the basis of their qualifications, demonstrated skills, abilities and achievements, and not on characteristics such as, nationality, age, race, religion, ethnicity, disability, sexual orientation, culture, or gender.

- This means we each should:
- Respect and value the contributions of each team member.
 - Acknowledge and counter the cognitive biases we may hold when making decisions or assessing others.
 - Embrace our differences to promote innovation and collaboration.



We create and maintain a safe, welcoming work environment.

We do not tolerate any form of harassment, including:

- Threatening remarks
- Sexual harassment
- Racial, ethnic, or religious slurs or jokes
- Bullying
- Any other harassing behavior prohibited by law

If you believe you have been subjected to sexual harassment or any other form of harassment or if you have observed any conduct which is or could be perceived as discriminatory or harassing, you should immediately report the situation to Human Resources, contact cobc@qualcomm.com, or you can contact the Company's Business Conduct Hotline.

Our Code at Work

You are in a virtual Teams meeting, and each time you try to speak, another more senior employee talks over you or corrects you. This happens more than ten times throughout the one-hour call, so you go on mute and stop sharing your input and ideas. This is not the first time this individual has treated you this way in front of a large group. What should you do?

You could contact the person that repeatedly interrupted you and respectfully let them know how it made you feel, and that this kind of interruption does not foster open discussion and diverse ideas. If you are not comfortable speaking to this individual directly, you should raise your concern with your manager, Human Resources, contact cobc@qualcomm.com, or contact the Company's Business Conduct Hotline. If you observe this kind of behavior, consider approaching the individual(s) involved, department management or Human Resources to address the conduct and its impact on the team.

The Qualcomm Way

- The Way Our Code Guides Us
- [The Way We Respect Each Other](#)
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust
- The Way We Follow the Law
- The Way We Engage with the World Around Us
- Resources

Additional Details

- [Environment, Health and Safety site](#) (go/ehs)
- [EHS Code of Practice](#) (go/ehspolicies)

Environment, Health and Safety (EHS)

Qualcomm is committed to conducting its operations and business activities in a safe, healthy, and productive manner, protecting the environment, and conserving natural resources. Qualcomm employees are expected to keep themselves and those with whom they work safe by performing all work in compliance with applicable health, safety, and environmental laws and regulations and our EHS Code of Practice.

Lead the Way

Following basic safety guidelines can prevent workplace injuries and accidents.

To maintain a safe and healthy work environment:

- Take personal responsibility for employee health and safety and actively foster a culture of safety in your work area.
- Recognize and understand the hazards associated with your work and receive applicable EHS training to protect yourself from those hazards.
- Ensure that vendors, contractors, or business partners are made aware of Qualcomm’s EHS Code of Practice and complies with all relevant health and safety procedures.
- Promptly report workplace-related injuries, incidents, hazardous releases to the environment, regulatory violations, or unsafe work conditions to your manager, Human Resources, and the EHS team.



Our Code at Work

While working in the lab, you see a service vendor placing oily rags, and other hazardous materials into the regular trash. What should you do?

If you see an individual working in a manner that may violate the Company’s health, safety, or environment procedures, or if you notice an unsafe work practice, take the steps to stop the unsafe activity. Raise your concerns about the situation to management or the EHS team. Employees should report to the EHS team any unsafe practice or condition that may result in harm to people, equipment, or the environment, as well as a regulatory penalty. We support a proactive and collaborative platform to enable a safe work environment.

The Qualcomm Way

- The Way Our Code Guides Us
- [The Way We Respect Each Other](#)
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust
- The Way We Follow the Law
- The Way We Engage with the World Around Us
- Resources

Additional Details

- [Global Security, Cyber Security, Product Security](#) (go/security)
- [Drug Free Workplace Policy](#) (go/drugfree)

Workplace Security

At Qualcomm, all employees should help create and maintain a secure environment and promote the safety of our employees and the security of our facilities and confidential information.

Lead the Way

We follow the Company’s badge policy. This includes scanning our identification badges at building entry points, even if we are entering the building with others. It also means we don’t loan our badge to others and report missing, lost, or stolen badges immediately. We also manage our visitors by ensuring they are always escorted, and we never prop locked doors open for ease of entry.

We also ensure our colleagues are safe by reporting suspicious or concerning circumstances to the Security Department. This includes employees or non-employees behaving in a manner that is suspicious or potentially dangerous, visitors inside our facilities without an escort, any personal threats or threatening behaviors, and other illegal or inappropriate activities.

To maintain a safe, secure, and healthy work environment, we must never:

- Intimidate, harass, or threaten anyone – directly or indirectly.
- Commit acts of violence as prohibited by our Workplace Violence Policy.
- Possess weapons of any kind on Qualcomm property, including Company parking areas.
- Violate Company policies that prohibit the unlawful use, distribution, possession, or sale of alcohol, drugs, or other controlled substances.

In addition, we protect both our intellectual and personal property by physically locking our computers (e.g., press the Windows key + L) when we walk away from them. We maintain clean workspaces without Company confidential documents or valuable items left out and unsecured at the end of the day. Company confidential documents are to be placed in secure shred boxes when they are no longer needed.

Finally, we are good corporate citizens. If our actions impact other employees, we apologize and make an effort to resolve any problems we created. We are careful not to take property belonging to others and to report it if we see they have left something behind. We look out for one another and report suspicious activity that could impact others.



The Qualcomm Way

- The Way Our Code Guides Us
- [The Way We Respect Each Other](#)
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust
- The Way We Follow the Law
- The Way We Engage with the World Around Us
- Resources

Additional Details

- [Privacy Guiding Principles](#)
- [Privacy Guidelines for Personal Data Management](#)
- [Privacy Policies and Resources](#) (go/privacy)
- [Management of Customer Personal Information Policy](#)
- [Management of Employee Personal Information Policy](#)
- [Privacy team](#) (privacy.office@qualcomm.com)

Respecting Privacy

Qualcomm respects the privacy of all individuals and takes personal information protection seriously. We do this by following applicable privacy and data protection laws and building a foundation of privacy and data security practices.

Lead the Way

We take precautions to responsibly and diligently protect the privacy of:

Our customers

We embody our Privacy Guiding Principles and follow our privacy policies when developing products and services and handling our customers’ and consumers’ personal information.

Our fellow Qualcommers

We collect and manage personal information of employees and other people providing services to Qualcomm (e.g., consultants) in a manner that respects their privacy and complies with Company policy and applicable laws. For any employees or vendors whose job responsibilities involve collection or management of this information, we take measures to ensure they know and comply with data protection laws and applicable Company policy.

Personal information can include:

- Contact information (phone, email, etc.)
- Passport number
- Compensation details
- Medical and benefits information
- Internet Protocol (IP) addresses
- Account numbers



The Qualcomm Way

The Way Our Code
Guides Us

The Way We Respect
Each Other

**The Way We Protect Our
Tools for Innovation**

The Way We Build Trust

The Way We Follow
the Law

The Way We Engage
with the World Around Us

Resources

The Way We Protect Our Tools for Innovation

Throughout our history, Qualcomm has made the impossible possible, driving technology leadership, and continually raising the bar. One way we do this is by safeguarding our inventions and other physical and intellectual property that forms the basis of our business success.

Our tangible resources include our physical property and our assets. Equally important are our intangible resources, which include our ideas, business strategies, and other intellectual property that keep us on the industry’s cutting edge. It’s up to each of us to protect these resources.

In This Section

- Protecting Confidential Information
- Protecting the Power of Ideas
- Safeguarding Our Electronic Assets
- Being Responsible with Company Funds



The Qualcomm Way

- The Way Our Code Guides Us
- The Way We Respect Each Other
- [The Way We Protect Our Tools for Innovation](#)
- The Way We Build Trust
- The Way We Follow the Law
- The Way We Engage with the World Around Us
- Resources

Additional Details

- [Use and Protection of Company Confidential Information Policy](#)
- [Company Confidential Information site](#) (go/CCI)
- [QSAFE site](#) (go/qsafe)
- [NDA FAQs and to Request an NDA](#) (go/NDA)
- [Information Security & Risk Management site](#) (go/ISRM)

Protecting Confidential Information

Qualcomm’s success is based upon our technical leadership. As such, it is imperative that we protect confidential information, whether it’s information about our Company, our customers, our employees, or third-party information that has been entrusted to us.

Lead the Way

We take proper precautions to protect confidential information.

- **We don’t share inappropriately.** We don’t disclose or distribute confidential information unless necessary for business purposes. Before disclosing information that may be confidential to others – whether oral, visual, or written – we must ensure that written confidentiality obligations approved by the Legal Department are in place (such as a written Non-Disclosure Agreement (NDA)).
- **We use information responsibly.** We use this information only to perform our job duties and to further the Company’s interests.

- **We’re secure.** We adhere to Qualcomm’s cyber security policies and procedures and document control processes. We pay attention to the details by guarding our Company passwords.
- **We watch where we talk.** We don’t discuss confidential information in places where others could overhear it, such as around family members or roommates, or in public locations, such as restaurants, coffee shops, a trade show, or in an airplane, train, or elevator.
- **We exercise care when deciding whether to receive confidential information.** Before entering into an NDA with a third party, we should consider whether it is possible to accomplish the business purpose without receiving the confidential information. For example, by not receiving confidential information, we lessen the risk that the Company is accused of misusing that information.
- **We respect obligations we assume in NDAs.** We comply with the letter and spirit of confidentiality obligations we assume in NDAs.

- **We recognize that our confidentiality commitment may extend beyond the term of the NDA.** Our obligations to maintain the confidentiality of both Company and third-party information continue even after our employment with Qualcomm ends. Anyone leaving the Company must immediately return all Qualcomm property, including documents and media that contain Qualcomm confidential information and any third-party confidential information received during their employment at Qualcomm.

Promptly consult with Qualcomm legal counsel if:

- You know of or suspect an inappropriate attempt to obtain or disclose Qualcomm confidential information.
- You receive information that you believe may be third-party confidential information that Qualcomm is not authorized to have or use.



The Qualcomm Way

- The Way Our Code Guides Us
- The Way We Respect Each Other
- [The Way We Protect Our Tools for Innovation](#)
- The Way We Build Trust
- The Way We Follow the Law
- The Way We Engage with the World Around Us
- Resources

Additional Details

- [Use and Protection of Company Confidential Information Policy](#)
- [Company Confidential Information site \(go/CCI\)](#)
- [QSAFE site \(go/qsafe\)](#)
- [NDA FAQs and to Request an NDA \(go/NDA\)](#)
- [Information Security & Risk Management site \(go/ISRM\)](#)

Qualcomm confidential information includes any Company information not generally known to the public or the industry and that Qualcomm maintains as confidential. Examples of such information include (but are not limited to):

- Technical or engineering information for current and future products
- Work product resulting from your efforts at Qualcomm
- Information about potential acquisitions or investments
- Business or marketing plans or projections
- Contractual terms
- Earnings and financial data
- Customer information
- Information about organizational structure and changes
- Personnel information
- Software in object or source code form
- Third-party information protected by confidentiality obligations (e.g., under a non-disclosure agreement (NDA))

The vast majority of information you create, contribute to, access, or receive from others while you work at Qualcomm must be kept confidential. If you are unsure about the confidential nature of information, treat it confidentially unless/until you receive guidance otherwise.

Our Code at Work

A friend is applying for a job at Qualcomm and asks for project information to study up for the interview. Should you provide it?

No. You should always protect our Confidential information and only share it with employees or third-party partners that have a valid Non-Disclosure Agreement in place and a legitimate business need for the information.



The Qualcomm Way

- The Way Our Code Guides Us
- The Way We Respect Each Other
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust
- The Way We Follow the Law
- The Way We Engage with the World Around Us
- Resources

Additional Details

- [Electronic Media Policy](#) (go/emedial)
- [Open Source Policy, Process, and Team](#) (go/opensource)
- [Open Source Request](#) (go/osrm)
- [Standards & Industry Organizations Policies and site](#) (go/standards)
- [Use and Protection of Company Confidential Information Policy](#)
- [Conflict of Interest Review form](#)
- [Standards Review Team](#) (legal.pm.standards@qualcomm.com)

Protecting the Power of Ideas

Qualcomm’s business success has always been based upon technology leadership – leading the industry in the advancement of our technology. Protecting our confidential technical information helps maintain our technical leadership.

Lead the Way

Qualcomm generally owns the rights to inventions or ideas developed by our employees to the extent permitted by law, regardless of where or when it’s created or whether it is patentable or protectable by copyright, trade secret, or trademark. Even if the IP developed does not relate to Qualcomm’s actual or anticipated business interests and was not the result of a work assignment, it still may be owned by the Company. Therefore, we must each submit the intellectual property we develop to Qualcomm and protect it as we would any other Qualcomm confidential information. What can compromise our Company’s intellectual property?

Open Source Software: Open Source materials (“Open Source”) are developed and supported collaboratively by the open source community, and made available to the general public free of charge. Open Source may include software (binary and source), image files, as well as hardware components when the files used to build hardware are in its modifiable software form. All use, review, and development of Open Source Software should comply with our Open Source policies and procedures. In particular, before committing to using any Open Source Software in Company products, file an Open Source Request or reach out to the Open Source team for guidance.

Industry Associations & Standard Development Organizations (SDOs):

Qualcomm helps lead industry technical development through its participation in various SDOs. Before the Company commits to membership in an SDO, it must ensure that it is in a position to comply with all membership terms and conditions. All SDO memberships must be approved in advance by the Standards Review Team. If membership is approved, those participating in the SDO must:

- Follow the appropriate policies and procedures.
- Comply with all applicable competition, export control, and antitrust laws.
- Avoid conflicts of interest.
- Protect Qualcomm’s intellectual property.

- Submit any standards-related inventions to Qualcomm.
- Understand and follow the commitments we have to the SDO.
- Contact Standards Review Team in Legal with questions or to get approval on entering into agreements.

As a Company that protects our own intellectual property rights, we also respect the intellectual property rights of other organizations. This means we never knowingly infringe on their copyrights, trademarks, or patents. We should also ensure that we are not in possession of other parties’ confidential information that we have not acquired lawfully and appropriately. For example, employees should never bring, share, or use confidential information from a former employer. In addition, we have a duty to ensure that all third-party software we are using is appropriately licensed and that we are using it only per the terms of the license. If you have any questions or concerns about intellectual property, consult the Legal Department.

“Intellectual property” refers to: Anything we create while employed at Qualcomm that is within the scope of Qualcomm’s business interests and may constitute protectible intellectual property under patent, trade secret, copyright, or trademark laws. Examples include ideas, inventions, designs, software, strategies, and plans.

Our Code at Work

You are a Qualcomm engineer working on implementing a new system protocol. This project sparked an idea for you – it’s a new framework you decide to design on your own time, with your own resources. Since this was done completely independently of Qualcomm time and assets, who owns the idea?

Because you are a Qualcomm employee and this idea is related to Qualcomm’s business, Qualcomm will own the rights to the design, no matter where or when it was created (subject to applicable law). Individuals may be able to apply for patents or other forms of individual recognition for the idea within Qualcomm. If you have an idea or business venture that you wish to pursue outside of Qualcomm, you should submit a Conflict of Interest Review form via myHR to seek required review and pre-approvals before proceeding with the outside business activity.

The Qualcomm Way

- The Way Our Code Guides Us
- The Way We Respect Each Other
- [The Way We Protect Our Tools for Innovation](#)
- The Way We Build Trust
- The Way We Follow the Law
- The Way We Engage with the World Around Us
- Resources

Additional Details

- [OnelT Policies](#) (go/itpolicies)
- [Use and Protection of Company Confidential Information Policy](#)
- [Electronic Media \("E-Media"\) Policy](#) (go/emedial)

Safeguarding Our Electronic Assets

Lead the Way

We are all responsible for using Company resources wisely, and respecting the following principles:

- Qualcomm’s e-media is Company property and is provided for business purposes.
- While Qualcomm allows reasonable personal use of its e-media systems, that use should never conflict with business priorities, put CCI or Qualcomm e-media systems at risk, or cause any harm to Qualcomm, and must comply with the Company’s E-Media Policy at go/emedial.
- To protect Qualcomm’s confidential information from loss or theft, the Company monitors our e-media systems and the data processed over our networks. We process the data we collect in the US and other countries. See the links below for additional details.
- Company resources should never be used to download, display, print, or store material that is unlawful, inappropriate, offensive, or creates an excessive strain on our systems.

If you suspect or know of potential theft, fraud, mishandling, or misuse of any type of Qualcomm property, you should raise your concerns immediately to any member of management, Global Security, Human Resources, contact cobc@qualcomm.com, or you can contact our Business Conduct Hotline.

Examples of Qualcomm e-media include both physical property and electronic media such as:

- Computers
- Phones
- Email
- Network and Internet access
- Printers
- Collaboration tools (e.g., Microsoft Teams)

Our Code at Work

I am on a deadline to deliver key information to customers in a short timeframe. Can I upload the files to my personal cloud account to be able to quickly access them later?

No. Transferring or storing Qualcomm Confidential Information on personal cloud accounts or devices outside the Qualcomm firewall puts our data at risk and violates Company policies.



The Qualcomm Way

- The Way Our Code Guides Us
- The Way We Respect Each Other
- [The Way We Protect Our Tools for Innovation](#)
- The Way We Build Trust
- The Way We Follow the Law
- The Way We Engage with the World Around Us
- Resources

Additional Details

- [Travel Expenses](#) (go/travel)
- [Expenditures Approvals](#) (go/approvals)
- [Spending Guidelines](#) (go/qexpense)

Being Responsible with Company Funds

When we spend the Company’s money for travel, entertaining, procuring goods, or other business-related needs, we always use discretion, act responsibly, and ensure that the expenses are reasonable and recorded properly. We fully and accurately record anything of value provided to government officials, as required by the Company’s Global FCPA and Anti-Corruption Policy.

Lead the Way

When we incur expenses on behalf of the Company, we need to act responsibly, including:

- Not charging personal expenses to the Company.
- Ensuring expenses are moderate, reasonable, and not excessive for the situation.
- Following all of Qualcomm’s travel expense policies or travel-related expense policies.
- Selecting venues that are appropriate for business and that align with Qualcomm’s values.
- Seeking appropriate approvals on expenditures per Company policies.
- When possible, using vendors designated by the Company to be used for specific purchases.
- Providing the appropriate documentation when submitting expenses for reimbursement, including receipts, invoices, or notes.
- When unsure if an expense is appropriate or reasonable, seeking guidance before incurring the expense.

Note for Managers: You are responsible and accountable for expenses incurred and budgets established by those in your organization. By approving expenses, you are affirming that you have reviewed them, including supporting documentation such as receipts and notes, and they are in accordance with Company policies and business unit objectives.



The Qualcomm Way

The Way Our Code
Guides Us

The Way We Respect
Each Other

The Way We Protect Our
Tools for Innovation

The Way We Build Trust

The Way We Follow
the Law

The Way We Engage
with the World Around Us

Resources

The Way We Build Trust

The Qualcomm Way can be summarized as “doing the right thing.” When we follow The Qualcomm Way, we build trust with each other, our customers, our business partners, our stockholders, and the communities in which we live and work.

In This Section

- Avoiding Conflicts of Interest
- Avoiding Insider Trading
- Selecting Our Suppliers
- Keeping Honest and Accurate Records
- Representing Qualcomm with Integrity



The Qualcomm Way

- The Way Our Code Guides Us
- The Way We Respect Each Other
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust
- The Way We Follow the Law
- The Way We Engage with the World Around Us
- Resources

Additional Details

- [Conflicts of Interest Policy](#) (go/conflict)
- [Conflict of Interest Review form](#)
- [Global FCPA and Anti-Corruption Policy](#) (go/fcpa)
- conflict-of-interest@qualcomm.com

Avoiding Conflicts of Interest

Conflicts of interest can occur when a personal interest or activity (like a gift, a personal relationship, vendor relationship, or outside business activity) influences – or appears to influence – our ability to use good judgment or make business decision(s) in the Company’s best interests. They erode trust, may put the Company at risk, and could damage reputations. At Qualcomm, each of us is expected to be transparent, avoid situations that may present actual, potential, and/or perceived conflicts, and ensure that we are always acting in the best interest of the Company.

Lead the Way

We are each responsible for actively avoiding any situation in which a conflict of interest might arise. While conflicts of interest come in a variety of formats and scenarios, there are some common situations that we should all know how to handle.

Gifts, Entertainment, and Hospitality

We should never give or accept gifts, or anything else of value, if it could appear to influence our judgment or any business decision improperly.

In general, we should not solicit gifts and may not accept gifts of more than nominal value. Perishable gifts or marketing materials with a company logo are generally not considered improper. An infrequent meal may be accepted or given if it is held at an appropriate location and is not excessive, and where the purpose of the meal is secondary to a business meeting or to enhance business relationships. The giver of the gift should not expect anything in return.

Please see the Conflicts of Interest Policy and Global FCPA and Anti-Corruption Policy for more guidance on giving and receiving gifts.

Personal Relationships

There may be situations where immediate family members, close friends, or those with whom we are in an intimate relationship are employed by Qualcomm, its suppliers, customers, or competitors. In these situations transparency is important; so, it is important to disclose such situations to a manager, Human Resources, the Office of Compliance, or the Legal Department as soon as you become aware of them. The Company can then evaluate and take appropriate steps to avoid even the appearance of a conflict of interest.

Outside Activities

We all must dedicate our professional efforts primarily to Qualcomm and refrain from engaging in outside business activities. Outside business activities should be reviewed and, if necessary, approved in advance per Company policy and/or local regulations. In addition, we are not permitted to pursue business opportunities for ourselves (or for another person) that Qualcomm may be interested in.

For-profit outside board memberships or advisory board service is prohibited unless employees are acting on Qualcomm’s behalf in connection with their role and responsibilities for the Company (for example, a member of the Qualcomm Ventures Department that sits on the board of one of Qualcomm’s portfolio companies). Exceptions to this prohibition are disfavored and must be approved in advance by the department Vice President or Senior Vice President, Chief Human Resources Officer, the Office of Compliance, and the Chief Executive Officer.

If you believe you may have a conflict of interest or have observed a situation where a conflict of interest may be present, contact the Office of Compliance or email conflict-of-interest@qualcomm.com for guidance on how best to navigate the situation. If you have a situation or opportunity that you would like to submit for review and pre-approval, please submit a Conflict of Interest Review form via myHR.

The Qualcomm Way

- The Way Our Code Guides Us
- The Way We Respect Each Other
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust**
- The Way We Follow the Law
- The Way We Engage with the World Around Us
- Resources

Additional Details

- [Conflicts of Interest Policy \(go/conflict\)](#)
- [Conflict of Interest Review form](#)
- [Global FCPA and Anti-Corruption Policy \(go/fcpa\)](#)
- [conflict-of-interest@qualcomm.com](#)

Our Code at Work

Your department is vetting a new workflow solution. One of the vendors under consideration to provide the solution offers you a \$100 gift card in appreciation for the time you spent participating in the system demo. As a Qualcomm employee, should you consider accepting this offer?

As a general rule, any cash or cash equivalent benefit that is offered to you by a Qualcomm business partner or a vendor that is pursuing Qualcomm’s business is prohibited under our Conflicts of Interest Policy and should be declined unless you have management pre-approval to accept the gift card so that it can be used for a department raffle or in another way that will benefit the entire department (e.g., order lunch in for the team).

You are a software engineer who creates apps and video games in your free time, and you do not believe that it has anything to do with Qualcomm or its business interests. Does Qualcomm’s Conflicts of Interest policy permit this activity?

Requests related to outside business activities, such as app and video game development, are reviewed on a case-by-case basis for potential conflicts of interest. To ensure compliance with Qualcomm’s Conflicts of Interest Policy, you should submit a Conflict of Interest Review form so that the outside activity can be reviewed and a decision made as to whether it is approved.



The Qualcomm Way

- The Way Our Code Guides Us
- The Way We Respect Each Other
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust
- The Way We Follow the Law
- The Way We Engage with the World Around Us
- Resources

Additional Details

- [Insider Trading Policy](#)
(go/insider)
- [Insider Trading FAQs](#)
- insidertradingquestions@qualcomm.com

Avoiding Insider Trading

Insider trading happens when a person or entity trades in a security (e.g., purchase/sale of stock, options, puts, calls) while in possession of “material non-public information.” Material non-public information is information about a company that is not available to the investing public and is likely to influence a reasonable investor’s decision to buy or sell securities of that company. Both positive and negative information may be material.

Insider trading is illegal, unethical, and violates our Insider Trading Policy and this Code.

Lead the Way

Through your work at Qualcomm, you may become aware of material non-public information about Qualcomm or other companies, such as customers, licensees, vendors, or acquisition targets. If you obtain material non-public information about Qualcomm or another company, you may not trade in that company’s securities. Using this information for your own personal benefit or disclosing it to others who use it for their benefit, are violations of the United States Securities Laws, our Insider Trading Policy, and this Code. In addition, if you disclose material non-public information to a third party (e.g., a friend or relative) who then trades based on that information, that third party is also in violation of the Federal Securities Laws. Violations of these laws may result in civil and criminal penalties, including fines and jail sentences.

In addition, please note that short sales and derivative transactions in Qualcomm securities (e.g., puts, calls, publicly traded options) are also prohibited by our Insider Trading Policy, regardless of whether the transaction involves the use of material non-public information.

Contact Corporate Legal or the Office of Compliance for guidance in this area.

Our Code at Work

You believe that Qualcomm’s stock has been consistently undervalued by the market, given the Company’s strong performance and many growth opportunities. You are further convinced of this after hearing from a colleague that Qualcomm’s earnings for the current quarter will exceed analysts’ expectations. Can you buy shares of Qualcomm stock on the open market? What about buying options on Qualcomm stock?

Neither transaction is permissible. While employees are generally permitted to buy Qualcomm stock on the open market, you may not do so at any time that you are aware of material non-public information. Information regarding Qualcomm’s financial performance (prior to its public announcement) is generally considered material. Employees are never permitted to buy or sell options or other derivative securities involving Qualcomm stock (regardless of any information they possess).



The Qualcomm Way

The Way Our Code Guides Us

The Way We Respect Each Other

The Way We Protect Our Tools for Innovation

[The Way We Build Trust](#)

The Way We Follow the Law

The Way We Engage with the World Around Us

Resources

Additional Details

[Insider Trading Policy](#)
(go/insider)

[Insider Trading FAQs](#)
insidertradingquestions@qualcomm.com

Our Code at Work

You are assisting with the due diligence process for Qualcomm's acquisition of a smaller public company, which has not been announced. Your role in the transaction is limited and you do not have many details - for example, you do not know how much Qualcomm will pay for the company. Can you still sell Qualcomm RSU/ESPP shares during this time? Can you buy shares of the target company, given your limited knowledge of the transaction?

Whether you can sell Qualcomm RSU/ESPP shares depends on whether the potential acquisition is considered material to Qualcomm. When in doubt, you should check with the Legal team working on the transaction or contact insidertradingquestions@qualcomm.com. Even if buying shares of Qualcomm is permitted because the transaction is not material to Qualcomm, it may still be impermissible to buy the shares of the acquired company, as an acquisition is generally considered material for the company being acquired, regardless of the amount paid.

Examples of information that could potentially be material, non-public information include actual, potential, or projected:

- Financial performance, including earnings or guidance.
- Significant mergers, acquisitions, joint ventures, or divestitures.
- Events regarding a company's stock, including stock repurchases, dividends, stock splits, or new equity or debt offerings.
- Significant contracts, orders, design wins or losses, partnership arrangements, product developments, or technology advancements.
- Significant information about customers, licensees, or other business partners.
- Litigation, arbitration, or regulatory matters (including threatened matters), and significant developments in such litigation, arbitration, or regulatory matters.



The Qualcomm Way

- The Way Our Code Guides Us
- The Way We Respect Each Other
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust**
- The Way We Follow the Law
- The Way We Engage with the World Around Us
- Resources

Additional Details

- [Conflicts of Interest Policy](#) (go/conflict)
- [Sustainable Supply Chain Management](#)

Selecting Our Suppliers

An open, honest, and fair partner selection process allows us to build supplier relationships based on mutual trust and ensure that the Company’s best interests are pursued.

Lead the Way

We choose suppliers and vendors who stand behind the quality of the products and services they provide and abide by our Code and the law. Our decisions are based strictly on business considerations and Qualcomm’s best interests, without regard to personal or financial gain or personal relationships.

- We may not directly or indirectly solicit or accept money, or benefits of any kind, for any advice or services we provide to a supplier in connection with obtaining or retaining business on Qualcomm’s behalf, or for directing business to a specific supplier.
- When making selections amongst competing suppliers, we engage our procurement team, and follow a process that allows us to weigh the facts impartially to determine the best supplier for our Company’s needs.
- We should disclose any actual, potential, or perceived conflicts of interest to a manager, Human Resources, the Office of Compliance, or the Legal Department.
- We require our semiconductor suppliers to acknowledge and implement the Qualcomm Supplier Code of Conduct, which embodies the principles of the Responsible Business Alliance (RBA) Code of Conduct. The Qualcomm Supplier Code of Conduct provides clarity with regard to labor, health and safety, environmental, ethics, and management expectations of our suppliers.

Complying with Anti-Money Laundering Laws

Anti-money laundering (AML) refers to the laws, regulations, and procedures intended to prevent criminals from disguising illegally obtained funds as legitimate income. Qualcomm is committed to compliance with all applicable international laws that are enacted to combat money laundering and the funding of terrorist or other criminal activities. We mitigate risks in this area by conducting customer screenings to ensure we are not transacting business with individuals or entities that are on U.S. and international sanctions lists. We also monitor for “red flags” that may signal money laundering activities, such as all-cash payments, payments made from an unknown source, or through a personal bank account.

Our Code at Work

You are a decision maker in a large software contract with a company where you are aware that your manager’s spouse is the VP of Sales and will benefit if the deal is signed. Should you continue to be involved in the selection process?

It depends. If the supplier was sourced without any involvement from your manager, then there may not be an issue. However, it would be best to be transparent about the relationship by reporting it to your department head and an HR representative to avoid even the perception of a conflict. Although you may be prepared to make an objective decision, your manager’s relationship to one of the suppliers could give the appearance of impropriety or inadvertently influence your judgment in the selection process. By disclosing the potential conflict, you provide transparency so the situation can be reviewed in advance of a final selection, and you enhance your credibility in the process.



The Qualcomm Way

- The Way Our Code Guides Us
- The Way We Respect Each Other
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust
- The Way We Follow the Law
- The Way We Engage with the World Around Us
- Resources

Keeping Honest and Accurate Records

Our stockholders trust us to maintain accurate and honest books and records. These records form the basis for our public disclosures and filings in addition to providing a snapshot of our Company’s operations and financial standing. Qualcomm also uses these records internally to make important business decisions.

Lead the Way

Our Company records should always be complete, accurate, and understandable. We never make false or misleading entries, and we never establish any unrecorded Company funds or assets, such as “slush funds” or other “off the books” accounts.

It’s important to give special attention to:

Financial Disclosures

To ensure that our Company’s financial statements are true, fair, accurate, and timely, we comply not only with the legal and regulatory requirements that govern these reports but also with Qualcomm’s applicable internal controls.

Contract Compliance

All contractual commitments should be in writing and uploaded into our contract management database pursuant to Company policies. We must also be careful not to make business commitments outside of what is documented in these contracts, through informal agreements, oral or otherwise.

Record Retention

We retain books and records in accordance with relevant Company policies and procedures. Specifically, the Company’s retention schedule takes into account applicable law, business processes, industry standards, and other agreements, like those with works councils. Documents required for an audit, investigation, or other legal action should be retained as instructed by internal Legal counsel.

If you suspect or know of any misconduct related to recordkeeping, accounting, or financial reporting, or if you have any questions, contact a manager, the Finance Department, the Legal Department, the Internal Audit Department, the Office of Compliance, or the Business Conduct Hotline.

Each of us is responsible for ensuring that information is recorded fully and accurately in Company documents, including information provided in:

- Payroll documents
- Timecards
- Travel and expense reports
- Sales reports
- Customer and supplier records
- Design and engineering records
- Export and import records

Our Code at Work

You finalized a contract with a long-time vendor for integrating a new data analytics solution. All payments in the contract are tied to specific project deliverables, as this is Qualcomm’s preferred payment structure for this type of work. One of the executives from the vendor company contacts you to see if you would agree to pay thirty percent of the contract payments now at the start of the project. This would help them cover some of the overhead costs that will be required to ramp up technical resources to support the project. The executive emphasizes the long-term relationship and the fact that the cost of the overall contract would remain the same. Is this something that you should agree to, given the proven and productive relationship we have had with this vendor over time?

No. Employees should not direct the use of funds provided to partners or customers without proper transparency, authorization, and contract terms and conditions that are reflective of the actual working arrangement between the parties, as this may result in improper accounting treatment of the contract funds in Qualcomm’s books and records. Making deals outside of a written contractual agreement can undermine Qualcomm’s rights and put contract funding and deliverables at risk. It would also be a violation of our Code.

The Qualcomm Way

- The Way Our Code Guides Us
- The Way We Respect Each Other
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust
- The Way We Follow the Law
- The Way We Engage with the World Around Us
- Resources

Additional Details

- [Electronic Media Policy](#) (go/emedial)
- [Digital & Social Media Policy](#) (go/socialmedia)
- [Disclosure Policy](#) (go/disclosure)

Representing Qualcomm with Integrity

As Qualcomm employees, it’s critical that we represent Qualcomm honestly, fairly, carefully, and with unquestioned integrity.

Lead the Way

We communicate accurate and honest information about our Company and never make misrepresentations or misleading statements to anyone.

Business Relationships

We abide by the agreements and contracts we have entered into and aim to resolve any disputes in a positive and constructive manner.

Interacting with the Media and Speakerships

Only a limited number of individuals are authorized to make public statements about Qualcomm. You should not initiate contact with journalists or other members of the media and should not respond to their inquiries without prior approval from Corporate Communications. Speaking opportunities where you are going to speak about Qualcomm should also be approved through Corporate Communications. Whenever speaking about Qualcomm, our products or business, we are truthful, accurate and not misleading.

Online and Electronic Communications

Electronic messages (such as emails and text messages) and posts on websites (such as blogs, Facebook, Twitter, WeChat, and LinkedIn) are permanent, transferable records and can impact Qualcomm’s reputation and business interests. Use discretion and consider the permanence of what you write, even when using Qualcomm’s confidential and secure email and messaging systems. Never disclose or discuss Company confidential information on social media sites or email or other messaging platforms, unless they are approved in advance by the Company.

Government Officials, Audits and Investigations

If asked to provide information in connection with Company investigations, audits, or other legal matters, you should immediately contact the Legal Department. Legal will coordinate with other Company departments to ensure that Qualcomm’s response is accurate, clear, truthful, and provided in good faith.

If you are unsure about who to contact regarding a request, seek guidance from your manager.

Our Code at Work

An employee inadvertently e-mailed critically sensitive 5G design and product roadmap information to their personal Gmail account. The employee was attempting to copy the file to their Qualcomm e-mail, but Outlook auto-populated the employee’s personal e-mail address instead. Qualcomm’s systems generated a pop-up that warned of CCI being sent to an external email address; however, the employee selected “Personal data” to click through the warning. Did this incident constitute a violation of Qualcomm policy?

Yes. Although the employee’s action may not have been malicious, it was careless, easily avoidable, violated Qualcomm’s Use and Protection of Company Confidential Information Policy, and put some of Qualcomm’s most confidential information at risk. In most instances, when Qualcomm systems detect CCI being transferred to an external network, the system displays a pop-up warning. The employees must carefully review the pop-up and select the appropriate option to ensure that CCI is not sent off Qualcomm’s network where it may be compromised.



The Qualcomm Way

- The Way Our Code Guides Us
- The Way We Respect Each Other
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust
- The Way We Follow the Law**
- The Way We Engage with the World Around Us
- Resources

The Way We Follow the Law

We operate within the law wherever we do business and we are each responsible for ensuring that the Company abides by applicable laws.

In This Section

- Competing the Right Way
- Preventing Bribery and Corruption
- Export, Sanctions, and Import Compliance
- Following Industry Laws and Regulations



The Qualcomm Way

- The Way Our Code Guides Us
- The Way We Respect Each Other
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust
- The Way We Follow the Law**
- The Way We Engage with the World Around Us
- Resources

Competing the Right Way

Qualcomm engages in vigorous competition in accordance with applicable law. We sell our products and services on their merits, not by unlawfully limiting competition or obtaining competitive intelligence in an unlawful or unethical way.

Lead the Way

When promoting Qualcomm’s products and services, we always act with personal integrity, ensuring that our competitor comparisons are accurate, substantiated, and never misleading. Please contact the Legal Department if you have any questions about any particular situation.

Competitor Agreements

We abide by antitrust and competition laws wherever we operate and never engage with competitors to limit competition. In fact, we avoid even the appearance of any improper agreement. This means that we don’t engage with competitors to:

- Discuss pricing or pricing policy, margins, discounts, costs, marketing, or strategic plans
- Agree on prices or any price component (margins, discounts, etc.)
- Agree to divide or allocate customers, markets, territories, or countries
- Discuss product capacity or output
- Discuss product roadmaps or confidential technology
- Boycott certain customers, suppliers, or competitors
- Discuss employee recruitment policy and compensation
- Agree to inappropriate restrictions regarding hiring



Competitive Intelligence

In our industry, collecting information about our competitors is not only normal – it’s key. But this should always be done lawfully, through appropriate sources.

Even if there is no formal written agreement, the mere exchange of confidential information (e.g., price related information, customers’ requirements, product roadmaps, our intention to bid or not bid for a certain opportunity) with competitors can create the appearance of an informal understanding. Use caution when interacting with competitors at conferences and other similar events.

If a competitor attempts to discuss a confidential competitive matter, such as pricing information or our intention to bid, stop the conversation immediately and promptly report the incident to the Legal Department. Inaction on your part may be assumed by others to be explicit or tacit agreement to collude with competitors. Immediately reporting this conduct to Legal is imperative to protect you and Qualcomm.

Our Code at Work

You have a friend that founded a technology start-up that is being considered for acquisition by Qualcomm. You join your friend for dinner, and he asks if you can share any information about whether Qualcomm has developed technology in the same area as his company. You don’t work in that area of engineering, but you have friends in that group and could find out. Should you look into it and share this information with your friend?

No. You should never share Qualcomm confidential information with a third party, even if the person is a close friend. Sharing this kind of information could compromise negotiations for the acquisition of this start-up company and violate multiple Qualcomm policies, including our Use of Company Confidential Information and our Conflicts of Interest policies.

The Qualcomm Way

- The Way Our Code Guides Us
- The Way We Respect Each Other
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust
- The Way We Follow the Law**
- The Way We Engage with the World Around Us
- Resources

Competing the Right Way continued

Which Way?
When we are presented with the opportunity to gain competitive intelligence, we should ask ourselves:

- Was the information obtained illegally or unethically?
- Was the information obtained through misrepresentation or deception?
- Was the information the result of a confidentiality breach? (For example, from the former employee of a competitor.)

NO?
GO! This information was obtained The Qualcomm Way.

YES?
STOP! We may only attempt to gather and use information legally, ethically and honestly.

Our Code at Work
In response to your job posting, you receive an application from someone who is also applying for a job at a competitor. Your counterpart at the competitor, who is also your friend, calls you to request that you not hire the applicant as a personal favor. Should you say yes?

No. Before agreeing to anything in that regard, you should contact legal to ensure that any such agreement would be lawful.

One of our suppliers emails you confidential roadmap information for one of our competitors. Since you didn't ask for the information and didn't mislead anyone to get it, can you use it?

No. We respect other companies' confidential and proprietary information, including our competitors. If there are any questions about using third-party information, contact our Legal Department before copying, using, or disclosing the information.

By coincidence, you run into your competitor at a customer's "Supplier Day." After exchanging pleasantries, your competitor starts saying that this round of negotiations with the customer was particularly challenging, and that your competitor would have trouble meeting the customer's requested discount level. Can you continue this conversation, and discuss future pricing arrangements being proposed to the customer?

No. You should reply that it is inappropriate to discuss such information, immediately end the meeting, and contact Legal.

If you have a question or concern about competition law or the appropriate gathering and use of competitive information, please contact our Legal Department.



The Qualcomm Way

- The Way Our Code Guides Us
- The Way We Respect Each Other
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust
- The Way We Follow the Law**
- The Way We Engage with the World Around Us
- Resources

Additional Details

- [Global FCPA and Anti-Corruption Policy and site \(go/fcpa\)](#)
- [Compliance Expense Pre-Approval Request \(go/fcparequest\)](#)
- [FCPA Team \(fcpa.help@qualcomm.com\)](#)

Preventing Bribery and Corruption

Qualcomm is committed to conducting business with integrity and following ethical business practices, and we therefore strictly prohibit all bribes, corrupt payments, kickbacks, and other forms of improper payments, whether involving private individuals or Government Officials. We abide by the various anti-corruption laws that apply to our global operations, including the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and other local anti-corruption laws wherever we do business.

Lead the Way

Do not offer, give, or accept bribes. We must not offer, give, or receive bribes to or from any individual, regardless of whether that individual is a Government Official or a private party, to obtain or retain business or secure an improper advantage. Bribes are not limited to the provision of cash or cash equivalents; anything of value—including charitable contributions, employment opportunities, internships, and invitations to events— could be considered a bribe under applicable anti-corruption laws.

Third parties must not offer or pay bribes of any kind. Any person or company working on Qualcomm’s behalf must not offer, give, or receive a bribe. 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. Before engaging a third party that will be interacting with government or public officials on Qualcomm’s behalf, contact the Office of Compliance to evaluate whether we need to conduct additional due diligence.

Facilitation payments are strictly prohibited. Facilitation Payments are small payments of cash or something of value made to individual Government Officials to secure or speed up routine, non-discretionary governmental actions; they are commonly called “facilitation” or “grease” payments. These payments are illegal in many countries and prohibited under our FCPA Policy.

A “bribe” can be: Anything of value, including cash, cash equivalents, gift cards, gifts, paid travel expenses, entertainment, favors, services, internships/employment, a donation to a favored charity, or loans, if offered to improperly influence a business action or decision.



The Qualcomm Way

- The Way Our Code Guides Us
- The Way We Respect Each Other
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust
- The Way We Follow the Law**
- The Way We Engage with the World Around Us
- Resources

Additional Details

- [Global FCPA and Anti-Corruption Policy and site \(go/fcpa\)](#)
- [Compliance Expense Pre-Approval Request \(go/fcparequest\)](#)
- [FCPA Team \(fcpa.help@qualcomm.com\)](#)

Preventing Bribery and Corruption continued

Be familiar with your responsibilities under our Anti-Corruption Policies. Our Global FCPA and Anti-Corruption Policy sets forth employees’ responsibilities for complying with worldwide anti-corruption laws. Contact fcpa.help@qualcomm.com if you have questions or would like guidance regarding your responsibilities or the application of our policy.

Compliance red flags:

- Vague consulting agreements that do not have defined deliverables
- Offers or requests to/from a business partner for lavish entertainment or luxury gifts
- Sponsoring a Government Official to attend a hospitality or appreciation event that is not business focused
- Excessive sales commission payments
- A vendor or supplier that requests that payments be made to an alternate third-party
- Hiring an individual that a government affiliated business partner referred
- Large discounts

Reporting. Immediately report any concerns relating to bribery or any other violation of our FCPA Policy directly to the Office of Compliance.

Penalties. Violation of this Policy could result in civil and criminal liability for the individuals involved and the Company, as well as disciplinary action, up to and including dismissal. Agents who violate this Policy may be subject to termination of all commercial relationships with Qualcomm.

Our Code at Work

You have been working on a special project with an employee of one of our business partners in a state-owned entity in China. The employee you are working with mentions that his son is moving to the U.S. and is interested in a position that Qualcomm has posted on its website. He asks if you could reach out to the hiring manager and put in a good word for his son. He tells you that in return, he will provide positive feedback to his employer regarding Qualcomm’s performance on the project that you are working on, to ensure Qualcomm is considered for future business. Is it acceptable for you to reach out to the hiring manager and put in a good word for the employee’s son?

No. The employee you are working with is considered a “government official” under the FCPA due to his employment with a state owned entity. Helping the employee’s son get a job with Qualcomm could be considered a bribe under the FCPA and would therefore violate Qualcomm’s FCPA Policy. Even if the government official did not promise to put in a good word for Qualcomm with his employer if you agree to support his son as a candidate for employment, such a quid pro quo arrangement may be implied. If you encounter a similar request or situation, please contact the Office of Compliance for guidance before taking action.



Export, Sanctions, and Import Compliance

The Qualcomm Way

The Way Our Code
Guides Us

The Way We Respect
Each Other

The Way We Protect Our
Tools for Innovation

The Way We Build Trust

**The Way We Follow
the Law**

The Way We Engage
with the World Around Us

Resources

As a global Company, Qualcomm is subject to export, sanctions, and import regulations and laws of each country where we conduct our business. The laws vary from country to country and more than one country's laws often apply to export and import transactions. Failure to comply with relevant laws can severely impact our business and lead to significant penalties or loss of export privileges.

Lead the Way

At Qualcomm, we follow applicable laws of the countries where we operate and Qualcomm policies and procedures in all our global activities led by both our Export & Sanctions Compliance and Import Compliance teams.



Additional Details

[Export and Sanctions Compliance](#) (go/exportandsanctionscompliance)

[Hand Carry Policy](#) (go/handcarry)

[Import Compliance](#) (go/import)

[Shipment Policy](#) (go/shipmentpolicy)

[Supply Chain Security](#) (go/scs)

Export Controls and Economic Sanctions

- **Export Controls.** Qualcomm complies with all applicable export laws and regulations of the US and countries where Qualcomm conducts business. Exports fall under three major categories: physical (shipments and hand-carries), electronic (emails, source code, and software downloads and distribution), and verbal (support and services). The US rules apply to reexports and in-country transfers, and to releases of technology to non-US nationals.
- **Economic Sanctions.** Economic sanctions are measures that prohibit or restrict dealings with certain countries, territories, individuals, and entities. Qualcomm will not engage in business with those subject to these sanctions unless prior governmental authorization is granted. Sanctions may restrict activities such as transfers of assets, monetary payments, provisions of services, exports of sensitive technology to the affected parties.
- Key current targets of US export control restrictions and export and economic sanctions include Cuba, Iran, North Korea, Russia and Belarus, Syria, Venezuela, and the Crimea, Donetsk, and Luhansk regions of Ukraine. The US, EU and other governments actively enforce their export and sanctions rules and can impose significant penalties on companies and individuals.

Anti-Boycott Laws

- U.S. Anti-Boycott laws prohibit Qualcomm and its employees from participating in other countries' boycotts that the U.S. Government does not endorse, most notably the Arab League boycott of Israel. Other countries may have similar rules.

If your job involves any interactions with non-US individuals or companies and cross border activities between multiple countries, understand your responsibilities on how to properly conduct the activity and follow established policies and procedures. This includes using approved processes and systems to help ensure that exports meet required screening, minimize potential risks, and that proper documentation, such as licenses and authorizations from the appropriate country legislators, are in place. The US, EU and other countries actively enforce their export, sanction, and Anti-boycott laws and regulations and may impose significant penalties on companies and individuals including fines, imprisonment, and loss of export privileges.

The Qualcomm Way

The Way Our Code Guides Us

The Way We Respect Each Other

The Way We Protect Our Tools for Innovation

The Way We Build Trust

[The Way We Follow the Law](#)

The Way We Engage with the World Around Us

Resources

Additional Details

[Export and Sanctions Compliance](#) (go/exportandsanctionscompliance)

[Hand Carry Policy](#) (go/handcarry)

[Import Compliance](#) (go/import)

[Shipment Policy](#) (go/shipmentpolicy)

[Supply Chain Security](#) (go/scs)

Export, Sanctions, and Import Compliance continued

Customs and Indirect Tax

- Transporting Qualcomm and third-party products across borders is subject to the importing country's customs laws and regulations. These apply regardless of the mode of transportation, including courier shipments, carrying by hand, or in personal luggage.
- If your job involves the physical movement of any products or Company-owned items, understand your responsibilities on properly conducting the activity and following established policies and procedures. Refer to Qualcomm's Shipment Policy guidelines to ensure compliance when engaging in international shipping activities.
- In each country where Qualcomm does business, we must analyze how the taxes on our transactions impact our Company. Each country has at least one, and often more than one, system of taxation. For example, value-added tax (VAT) is an indirect taxation system that applies to local sales, purchases, and imports and can be assessed at different points in the supply chain. If your job involves managing or initiating transactions that impact Qualcomm's indirect tax exposure, verify you are following the procedures managed by the Import Compliance Department.

Supply Chain Security

- Qualcomm participates in formal Supply Chain Security government programs that help ensure integrity and security from origin to destination. Supply Chain Security at manufacturing and non-manufacturing sites is governed by an internal framework overseen by the Corporate Trade Compliance Department with designated site leads responsible for implementation.
- If your job involves the movement of goods, understand your responsibilities on properly conducting the activity and following established policies and procedures.



The Qualcomm Way

- The Way Our Code Guides Us
- The Way We Respect Each Other
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust
- The Way We Follow the Law**
- The Way We Engage with the World Around Us
- Resources

Additional Details

[Qualcomm policies](#)
(go/policies)

Following Industry Laws and Regulations

As Qualcomm expands into various industries with various customers, our products may be regulated by a variety of regulatory bodies around the world. It’s important that we follow all applicable laws and regulations.

Lead the Way

Qualcomm complies with all applicable regulatory requirements that apply to our products in the countries where we operate. Regardless of location, each Qualcomm employee is responsible for following these laws and regulations.

As a global Company that does business with the government, Qualcomm is also aware of the strict legal requirements associated with selling to, negotiating with, and working with government customers. We comply with all of these requirements. If your work involves government contracts, it is your responsibility to know and follow the rules that apply to that work. For example, before entering into any contractual dealings with the United States Government or a contractor acting on behalf of the United States Government, you should consult with the QGOV Legal Department to ensure that we abide by all applicable laws and regulations.



The Qualcomm Way

- The Way Our Code Guides Us
- The Way We Respect Each Other
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust
- The Way We Follow the Law
- [The Way We Engage with the World Around Us](#)
- Resources

The Way We Engage with the World Around Us

At Qualcomm we embrace social responsibility. We’re a Company built on creating connections: to one another and to the world around us. We’re committed to changing the world – through innovations in technology and through our efforts to do business more responsibly and sustainably.

In This Section

- Protecting Our Environment
- Upholding Human Rights
- Participating in Political Activities
- Giving Back to Our Communities



The Qualcomm Way

- The Way Our Code Guides Us
- The Way We Respect Each Other
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust
- The Way We Follow the Law
- [The Way We Engage with the World Around Us](#)
- Resources

Additional Details

- [Corporate Responsibility](#)
(go/corporateresponsibility)
- [Product Responsibility](#)
- [Environmental Responsibility](#)
- [Environment, Health and Safety Policy](#)

Protecting Our Environment

Qualcomm is committed to minimizing impacts to the environment throughout our business. We build environmentally conscious practices into our business operations, processes, and product designs and comply with all applicable environmental laws and regulations.

Lead the Way

Each of us plays an important role in the conservation and protection of our environmental resources.

- We monitor the processes and materials that go into our products and processes to make them as sustainable as technically and commercially possible.
- Through our Environmental Management System (EMS) and various hazardous chemical substance elimination initiatives, we address the environmental, safety, and health impacts of our products and operations.
- We have a goal to achieve net-zero global emissions by 2040, and we aim to conserve water and reduce waste even as we expand our operations



The Qualcomm Way

- The Way Our Code Guides Us
- The Way We Respect Each Other
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust
- The Way We Follow the Law
- [The Way We Engage with the World Around Us](#)
- Resources

Additional Details

- [Universal Declaration of Human Rights](#)
- [International Labour Organization Core Standards](#)
- [UN Guiding Principles on Business and Human Rights](#)
- [Human Rights Statement \(go/humanrights\)](#)
- [Supplier Code of Conduct](#)
- [Policy on Responsible Sourcing of Minerals](#)
- [Supply Chain Management](#)
- [Corporate Responsibility \(go/corporateresponsibility\)](#)

Upholding Human Rights

We believe human rights are fundamental rights, freedoms, and standards of treatment to which all workers are entitled, including without limitation, women, migrant, student, contract, temporary, and direct employees. We are committed to promoting and respecting all internationally recognized human rights. We avoid complicity in any human rights abuse throughout our Company, our operations, and our business relationships, including our subsidiaries, partners, and customers, and those in our supply chain.

It’s important to raise concerns and report potential human rights violations through appropriate channels. 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.

Lead the Way

Our approach to these issues adheres to the articles enshrined in the Universal Declaration of Human Rights, the eight 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. In addition, Qualcomm has adopted the RBA Code of Conduct in our own operations and as our Supplier Code of Conduct.

- We comply with applicable labor laws and we require our business partners to do the same.
- We prohibit the use of child labor in our own operations and those of our suppliers. We will never knowingly use any suppliers who engage in child labor, nor will we condone such practices.
- We prohibit forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, enslaved labor, or trafficking of persons. All work is voluntary, and we are free to terminate employment at any time. We will never knowingly use any suppliers who engage in forced or slave labor, nor will we condone such practices.

- We respect the rights of employees to associate freely, join labor unions, collectively bargain under local law, seek representation, and join workers’ councils in accordance with local laws.
- We strive to reduce the potential for manipulation and misuse of our information technology systems to cause adverse human rights impacts, and we 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 work with our suppliers to ensure responsible sourcing of certain metals present in our products, including those responsibly sourced metals from the Democratic Republic of the Congo (DRC), adjoining countries of the DRC, and other conflict-affected and high-risk areas.
- We require our suppliers to acknowledge and implement the Qualcomm Supplier Code of Conduct, which embodies the principles of the RBA Code of Conduct. The Qualcomm Supplier Code of Conduct provides clarity with regard to labor, health and safety, environmental, ethics, and management expectations of our suppliers.

Our Code at Work

During an onsite visit to one of our suppliers, you overhear workers saying they paid a recruiter to get their job. Do you say something?

Yes. Our Supplier Code of Conduct states that workers shall not be required to pay employers’ or agents’ recruitment fees or other related fees for their employment. Report your concerns to Legal, Human Resources, or Corporate Responsibility so that this issue can be investigated.

The Qualcomm Way

- The Way Our Code Guides Us
- The Way We Respect Each Other
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust
- The Way We Follow the Law
- [The Way We Engage with the World Around Us](#)
- [Resources](#)

Additional Details

- [Lobbying Disclosure Policy](#) (go/lobbying)
- [Global FCPA and Anti-Corruption Policy](#) (go/fcpa)
- [Political Contributions Policy](#) (go/political)

Participating in Political Activities

We encourage our employees to participate in the political process as individual citizens. As a Company, we engage in the process constructively, and always in compliance with applicable laws.

Lead the Way

Whether participating in the political process as individuals or as a Company, there are important guidelines we follow.

Lobbying

“Lobbying” is any contact with government personnel for the purpose of influencing legislation or rule making. Some laws define lobbying more broadly to include our normal marketing activities. We comply with all relevant lobbying laws and reporting requirements. Obtain approval from our Government Affairs Department before becoming a registered lobbyist, performing any lobbying activities, or authorizing any third party to lobby on our behalf.

Public Official and Campaign Visits

Qualcomm encourages public officials to make non-partisan visits to our locations. These visits must be approved in advance by our Government Affairs Department.

Political Contributions

We may participate in the political activities of our choice, as long as we follow Company policies, and we do so with our own money, on our own time, and by making it clear that we are not acting on behalf of Qualcomm. Qualcomm will not pressure or coerce employees to make personal political contributions or take retaliatory action against those who do not.

Our Code at Work

You have been approached by a politician that you know, who recognizes that you work at Qualcomm, a prominent Corporation in San Diego. He believes the Company’s backing could positively impact his campaign. He has asked if you could influence the Company to provide a donation or other support for his campaign. Should you act on his request?

No. You should direct the inquiry to Government Affairs. This group is responsible for developing the Company’s legislative and Federal, State and Local Government relations and advocacy strategy and any affiliated political donations.



The Qualcomm Way

- The Way Our Code Guides Us
- The Way We Respect Each Other
- The Way We Protect Our Tools for Innovation
- The Way We Build Trust
- The Way We Follow the Law
- [The Way We Engage with the World Around Us](#)
- Resources

Additional Details

[Fundraising and Donation Drives in the Workplace](#)
(go/fundraising)

Giving Back to Our Communities

Qualcomm recognizes the importance of employees giving back to their communities by actively supporting personal causes and events.

Lead the Way

We are encouraged to be active in the civic life of our communities, but should follow important guidelines:

- Never pressure others to contribute to or participate in our preferred charitable organizations.
- Be aware of conflicts of interest that can arise – and avoid them.

Our Code at Work

A charity you support is hosting a fundraiser and would like you to share a request to donate with your network at Qualcomm. What should you do?

We encourage you to promote the causes you are passionate about to Qualcomm friends and colleagues. However, you should only contact those who you know personally and/or appropriate opt-in mail lists/groups. You should also ensure that the communication doesn't pressure others to contribute or participate.



The Qualcomm Way

- The Way Our Code Guides Us
 - The Way We Respect Each Other
 - The Way We Protect Our Tools for Innovation
 - The Way We Build Trust
 - The Way We Follow the Law
 - The Way We Engage with the World Around Us
- [Resources](#)

Resources

Thank you for reviewing **The Qualcomm Way: Our Code of Business Conduct**. As changes in our organization and business operations occur, we will reassess and clarify our practices, policies, and procedures. Visit our Code website ([go/cobc](#)) for the most up-to-date information, including links to policies, procedures, guidance, resources, and contact information.

If you have any questions or would like to discuss any concerns, there are many ways to speak up. You can reach out to:

- Your manager or any member of the management team
- Human Resources ([go/myHR](#))
- Legal Department
- Office of Compliance
- Ethics.mail@qualcomm.com
- COBC@qualcomm.com
- Our Business Conduct Hotline ([go/hotline](#))

Our Business Conduct Hotline is a 24-hour resource available for you to share questions or concerns. It is administered by a third party and allows you to raise concerns anonymously, where local country law permits. The Business Conduct Hotline website can help you find a local contact phone number or raise a concern via an online tool located on the website.

Don't know where to start? Visit [go/speakup](#) or email the Office of Compliance at Office-of-Compliance@qualcomm.com.

