

# Qualcomm's Commitment to Human Rights

Qualcomm is committed to respecting human rights and avoiding complicity in any human rights abuse, throughout our company, our operations and our communities. Our values and approach to these issues are guided by the [Universal Declaration of Human Rights](#), the [United Nations \(UN\) Guiding Principles on Business and Human Rights](#) and the [UN Global Compact Principles](#). Our membership in the [Electronic Industry Citizenship Coalition \(EICC\)](#) and our participation in [BSR's Human Rights Working Group](#) and the [UN Global Compact](#) further augment our efforts. Working with other companies in these multi-industry groups provides us with an opportunity to share best practices and discuss challenges in developing companywide solutions to address human rights concerns.

[The Qualcomm Way: Our Code of Business Conduct](#) demonstrates our commitment to operating with the highest level of ethical conduct and our dedication to human rights. We provide *The Qualcomm Way: Our Code of Business Conduct* to all employees worldwide and require that they review, acknowledge and confirm that they will comply with the policies that are covered. Our security personnel are trained in our policies and procedures concerning aspects of human rights that are relevant to our operations. The [Qualcomm Sustainability Report](#) and our [sustainability website](#) highlight the various programs and initiatives we offer that involve human rights matters. Qualcomm has adopted the [EICC Code of Conduct](#) in our own operations and as our Supplier Code of Conduct. The EICC Code is consistent with *The Qualcomm Way* and provides additional clarity with regard to labor, health and safety, environmental, ethics and management systems expectations of our suppliers.

Qualcomm's commitments below elaborate on the human rights issues most directly related to our business, industry and the communities we serve.

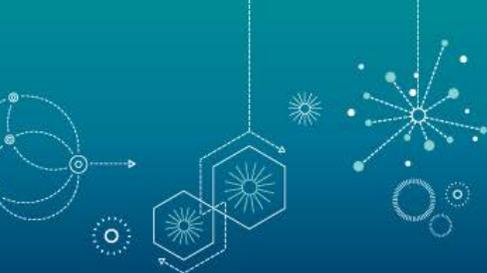
Human Rights Issues	Qualcomm's Commitments
<p><b>Diverse and respectful employment</b></p>	<p>At Qualcomm, we are committed to a work environment of inclusion in which employees see their differences as an asset and a strength. We thrive on the unique and innovative ideas generated by our employees. Their ideas help us to change the world every day. Engagement in unlawful discrimination or harassment will not be tolerated: instead we choose to demonstrate respect to each other and collaborate in ways that appreciate our similarities and celebrate our differences. We encourage the exchange of unique ideas and perspectives; we believe that both employees and business results benefit from valuing diverse experience, backgrounds and ideas.</p> <p>As part of our commitment to an inclusive and diverse work environment, Qualcomm ensures <a href="#">equal employment opportunities</a> for all applicants and employees in all aspects of employment without consideration of race, ethnicity, religion, color, national origin, age, gender, marital status, sexual orientation, gender identity and/or expression, veteran status, disability or any other basis prohibited by law.</p> <p>Qualcomm's <a href="#">supplier diversity program policy</a> promotes and encourages strategic partnerships with initiatives that foster and tap into the strengths of <a href="#">diverse suppliers</a>. We are committed to encouraging participation from and providing equal opportunities for small and diverse businesses to compete for contracts that are within their capabilities to perform. Including such suppliers in our supply chain makes us a stronger company. Not only do we benefit from a variety of capabilities and perspectives, we also gain the value of unique, entrepreneurial, customized services that many of these suppliers provide.</p>

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<p><b>Elimination of child labor, forced or compulsory labor and human trafficking</b></p>	<p>Forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons are prohibited, and we are always free to leave our employment. Child labor is not to be used in our operations or in any stage of our product manufacture at our manufacturing suppliers. Although legitimate workplace apprenticeship or intern programs that comply with all laws and regulations are permitted and supported, we will never knowingly use any suppliers who engage in child, forced or slave labor, nor will we condone such practices.</p> <p>As stated above, we have adopted the EICC Code of Conduct as our Supplier Code of Conduct. The EICC Code requires compliance with all applicable regulatory requirements pertaining to ethics, labor and environmental health and safety, in addition to forbidding forced, bonded or indentured labor, child labor and employee-paid recruitment fees. We assess key manufacturing suppliers to evaluate their conformance to our Supplier Code of Conduct via risk assessments and audits.</p> <p>Because we rely on suppliers for nearly all of our manufacturing, we generally do not encounter issues with child labor, forced labor or human trafficking in our direct operations. Our manufacturing suppliers, in all of their activities, must operate in full compliance with all applicable laws, regulations and rules of the countries in which they operate.</p>
<p><b>Right to exercise freedom of association; collective bargaining agreements and trade unions</b></p>	<p>We respect the rights of employees to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly in conformance with local law, as well as respect the right of workers to refrain from such activities. We are compliant with all collective agreements regarding significant operational changes as required by country laws and regulations.</p>
<p><b>Workplace health and safety</b></p>	<p>Qualcomm maintains a <a href="#">healthy, safe and productive work environment</a> in which employees treat each other and third parties with respect. Our Injury and Illness Prevention Plan provides clear, consistent and regulatory-compliant policies and protocols for managing health and safety. It describes our standards and specifications for training, safety audits, incident investigation and communications and helps us integrate safety practices in every aspect of our business.</p>

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<p><b>Anti-corruption</b></p>	<p>Qualcomm is committed to complying with applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), other U.S. laws and the anti-corruption laws and regulations of the countries where we do business. Qualcomm's FCPA and Anti-Corruption Policy applies to all employees.</p> <p>Qualcomm's anti-corruption commitment and program applies to all persons/entities that provide goods or services to Qualcomm through contract provisions and/or our supplier code of conduct; Qualcomm monitors and performs anti-corruption due diligence as needed on such persons/entities. Qualcomm regularly reviews its FCPA and Anti-Corruption Policy and program for suitability, adequacy and effectiveness, and improvements are implemented as deemed appropriate.</p>
<p><b>Access to health and education, participation in cultural life and enjoyment of the benefits of scientific progress</b></p>	<p><a href="#">Qualcomm Wireless Reach™</a> is a strategic program that brings wireless technology to underserved communities globally. Through this program, we invest in projects that foster entrepreneurship, aid in public safety, enhance the delivery of health care, enrich teaching and learning and improve environmental sustainability.</p> <p>The <a href="#">philanthropic endeavors of the Qualcomm Foundation and Qualcomm Incorporated</a> develop and strengthen communities worldwide. We invest our human and financial resources in inspirational, innovative programs that serve diverse populations and focus our philanthropy primarily in geographic regions where we have a business presence.</p>
<p><b>Conflict free minerals sourcing</b></p>	<p>Qualcomm is aware of concerns that minerals mined in conflict areas in the Democratic Republic of the Congo (DRC) and adjoining countries are contributing to human rights violations and environmental degradation. At Qualcomm, we work with our suppliers to ensure greater transparency of tantalum, tin, tungsten and gold that are present in our products. In addition, Qualcomm has adopted a <a href="#">Conflict Free Minerals Policy</a> and supports efforts such as the <a href="#">Public-Private Alliance for Responsible Minerals Trade (PPA)</a>; the <a href="#">Conflict Free Sourcing Initiative; iTSCi</a>, the ITRI Supply Chain Initiative; and the <a href="#">Responsible Sourcing Network Multi-Stakeholder Group</a>.</p> <p>Additional information about our program, including our Conflict Free Minerals White Paper and annual Conflict Minerals Report, can be found on our conflict minerals <a href="#">website</a>.</p>



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<b>Human Rights Issues</b>	<b>Qualcomm's Commitments</b>
<b>Privacy, security and freedom of expression</b>	<p>In our Company, in our products, and in the mobile industry, we're working to enhance the security of how we process and store data of all kinds, including personal data. We strive to foster trust in the use of wireless technologies by helping to enable responsible information privacy and data security practices. So that our customers can use our technologies with confidence, we incorporate privacy and security considerations into our products in the earliest stages of design. Through our global privacy and security programs, our employees routinely identify, evaluate and mitigate potential privacy or data security issues in our products and businesses. Our <a href="#">Privacy Guiding Principles</a> are integrated into our business processes, and our <a href="#">Privacy Public Policy Positions</a> describe our stance on privacy issues affecting the greater wireless ecosystem.</p> <p>Qualcomm believes information and communication technology is a powerful enabler of freedom of expression around the world. We also believe in robust and secure communications to ensure consumer trust and quality of experience.</p> <p>With respect to government surveillance, we understand and value the need to protect citizens, but that should also include protecting citizens' interest in privacy. To that end, there should be reasonable checks and balances on any governments' ability to collect user data. These reasonable limitations will work best when they balance security needs with user privacy and maximize the public's overall trust in way the technology works. This will also provide certainty for existing and future businesses to invest and innovate.</p>

Qualcomm has a variety of internal human rights-related policies and guidelines that comply with applicable laws and regulations and cover topics such as employment, benefits, time off, safety and security, learning and community involvement. These documents are company confidential and proprietary.

Qualcomm's annual risk assessment of our operations includes the consideration, review and prioritization of various company risks by a cross-functional group of key representatives from legal, finance, human resources and internal audit.

For more information on Qualcomm's commitment to human rights, please contact [humanrights@qualcomm.com](mailto:humanrights@qualcomm.com).