

Qualcomm

The Qualcomm

Way

**Our Code of
Business Conduct**

2018 Edition





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Letter from Our CEO

As Qualcomm employees, we are united in our commitment to purposeful innovation, passionate execution, and a collaborative community, all accomplished through unquestioned integrity. Together, we have revolutionized industries by creating technologies that connect people with the world around them. But it's how we make this all possible that defines us ... that's **The Qualcomm Way**.

Our Code of Business Conduct serves as a guide for our everyday work, helping us through ethical challenges and offering reminders and best practices along the way. It aims to build integrity into everything we do as a company.

Please read and become familiar with the Code. We are all responsible for helping ensure our Company does the right thing. If you have questions or if you have concerns about conduct that you don't think aligns with our values or guidance, reach out to your manager, Human Resources, Legal, our Business Conduct Hotline, or any member of leadership.

Thank you for bringing your talents, energy, and commitment to Qualcomm. I'm excited for the future and what we can achieve together – **The Qualcomm Way**.

Sincerely,

Steve Mollenkopf

CEO, Qualcomm

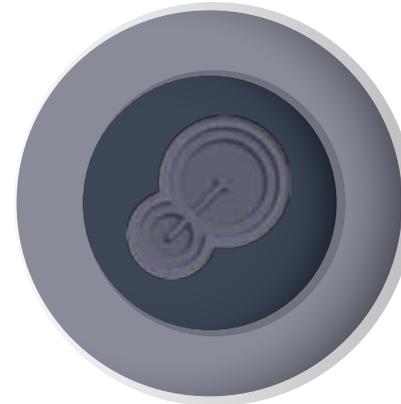


Qualcomm Values



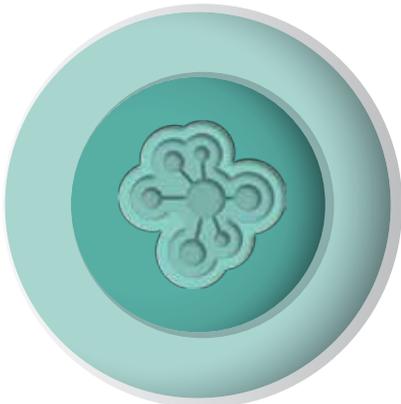
Purposeful Innovation

- 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 Way Our Code Guides Us

Using our Code means more than just reading it. More than just knowing it. It means living it.

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 find that each of us is vital to upholding and demonstrating our values in all we do.

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Purpose of Our Code

Our Code helps us navigate the ethical and legal situations we each face daily, and sets forth expected behaviors. 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

Although it cannot address every business dilemma we may encounter, the Code can guide us in making sound decisions so that we each can act with integrity. It includes information about:

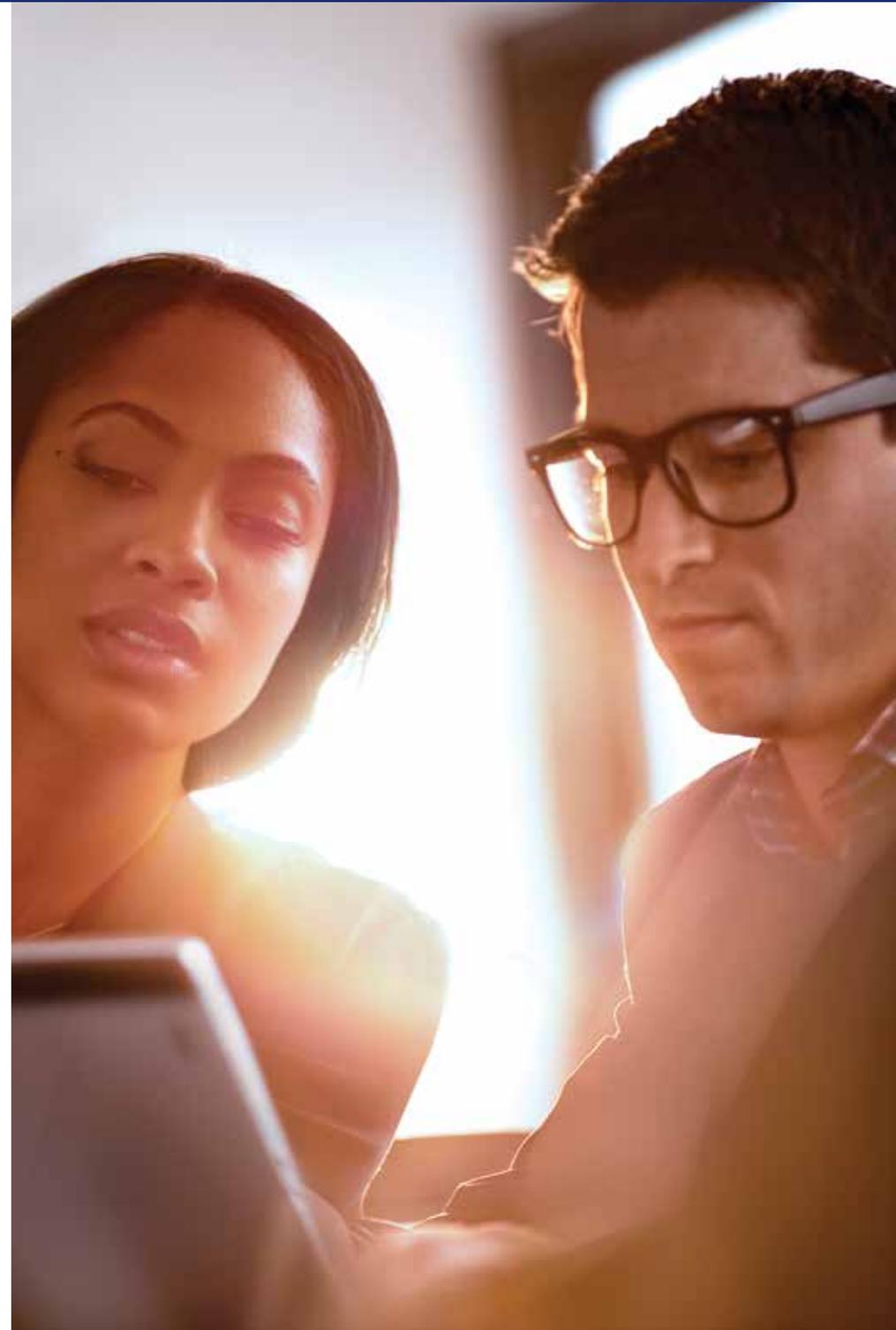
- Company policies
- Laws and regulations we must know and follow
- Standards for ethical conduct
- Resources for questions or concerns

Violations of our Code, Company policy, laws, or regulations may carry serious consequences including disciplinary action and possible termination. In some situations, the individuals involved and/or our Company may face civil 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.

Additional Details:

→ [Code of Business Conduct](https://www.qualcomm.com/code-of-business-conduct) (go/cobc)



Who Follows the Code

Qualcommers

All of us are expected to behave The Qualcomm Way – living and upholding our values every day.

Because Qualcomm operates in many countries, it's important to be aware of the different laws, regulations, and customs that may apply. 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 unless they are inconsistent with local law. In this case you should seek guidance from the Legal Department or email cobc@qualcomm.com.

Managers

Qualcomm managers have additional responsibilities:

- Lead by example, serving as role models, and by communicating 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.
- Seek guidance from the Office of Compliance, Human Resources, Legal, other management personnel on issues of concern, or our Business Conduct Hotline.
- Hold employees responsible for their conduct.

Our business partners

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

Our Code at Work

Q: An employee you manage comes to you with a concern, but asks that you not share it with anyone. The concern needs to be addressed by the Company, but you don't want to betray your employee's trust. What should you do?

A: As a manager, you are responsible for encouraging employees to bring concerns forward and ensuring that these concerns are addressed. If the employee is concerned about retaliation, you can reinforce our non-retaliation policy. If the concern is about keeping their involvement confidential, let them know that you will share their information only with those who need to know in order to investigate the issue. Explain that if you don't bring the issue forward, our Company cannot do anything to address it. You can also reassure them that the information will be handled as discreetly as possible and, to the extent you are able, you will keep them informed of the status of their concern. In the end, each of us is responsible for reporting known or suspected violations of the Code to the Company.

Additional Details:

→ [Open Door Philosophy](#) (go/opendoor)

Seeking Guidance and Raising Concerns

We are all responsible for being familiar with our Code, seeking guidance, and reporting 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 right thing. Or, we may just want confirmation that we're making the right decisions. The following resources are available for guidance and reporting:

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

Qualcomm addresses reports of misconduct promptly, professionally, and confidentially to the extent possible. Each of us is responsible for raising concerns and cooperating with any investigation.

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, report this immediately.



Seeking Guidance and Raising Concerns continued

Our Business Conduct Hotline

Our Business Conduct Hotline is a 24-hour resource available for you to share questions or concerns. Administered by a third party, it allows you to raise issues anonymously, where local country law permits. When you contact the Hotline, you will be assigned an identification number and security codes 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

Q: You want to raise a concern, but you are not entirely sure something is wrong. Do you report it?

A: Sometimes people worry about raising a concern because they are not 100% sure there is a problem. You are encouraged to raise any good faith concerns you may have. If no problem is found, then no action will be taken, and we have the opportunity to address the perception that caused the concern. If there is a problem, then raising the concern gives the Company the opportunity to investigate and address it as early as possible.

Additional Details:

→ [Business Conduct Hotline](https://go.hotline) (go/hotline)





Nuremberg, Germany

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.

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Maintaining a Positive Work Environment

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

Qualcomm does not tolerate any form of discrimination or harassment.

Lead the Way

We work together to ensure that our workplace is one of inclusion and respect. Our colleagues, job applicants, and business partners should be assessed on the basis of their qualifications, demonstrated skills, and achievements, and not on characteristics such as language, nationality, skin color, disability, sexual orientation, culture, or gender.

This means we each have the responsibility to:

- Value the contributions that each member of the team makes.
- Seek to recognize and counter the effects of cognitive biases we may hold when making decisions or assessing others.
- Acknowledge, value, and leverage our differences to promote innovation and collaboration.

We create and maintain a safe, welcoming work environment, free of offensive, intimidating or inappropriate behavior.

We do not tolerate any form of harassment, including sexual harassment, such as:

- Direct or indirect threatening remarks
- Sexual advances
- Racial or religious slurs or jokes
- Any other harassing behavior prohibited by law

If you believe you have been subjected to sexual harassment or 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 or cobc@qualcomm.com.



Maintaining a Positive Work Environment continued

Our Code at Work

Q: You receive an email from a co-worker containing jokes and derogatory comments about certain nationalities. It's not directed at you; in fact, it's not directed at anyone in particular, but it makes you uncomfortable. What should you do?

A: Notify Human Resources. Even if the jokes were not directed at anyone, this type of content doesn't demonstrate respect for others. It also undermines our values and violates our policies regarding email use, diversity, harassment, and discrimination. This type of behavior can pose a threat to the inclusive, respectful culture we all work to create. If comfortable, you are also encouraged to respectfully confront the co-worker who sent the email to let them know that you found their email inappropriate.

Additional Details:

- [Global Inclusion and Diversity site](#) (go/inclusion)
- [Prohibition of Harassment Policy](#) (go/harassment)



Environment, Health & Safety (EHS)

Qualcomm is committed to conducting its operations and activities in a manner that provides and maintains safe, healthful, and productive working conditions, protects the environment, and conserves natural resources. As a Qualcomm employee, you are expected to perform your work in compliance with all applicable health, safety and environmental laws and regulations, and our EHS Code of Practice.

Lead the Way

To maintain a safe and healthy work environment, we must:

- Take personal responsibility for health and safety, and for understanding how your work may affect the environment.
- Understand the hazards associated with your work, and only perform work for which necessary EHS training has been completed.
- Ensure your vendor, contractor, or business partner who work on our premises is made aware of Qualcomm's EHS Code of Practice.
- Promptly report workplace related injuries, incidents, releases to the environment, regulatory violations, or unsafe work conditions to your manager, HR, or the EHS team.

Our Code at Work

- Q:** You notice your department purchased a new piece of equipment and a co-worker is using it without being trained. They assure you that it's okay because their manager is aware of it, many of their co-workers are doing the same thing, and nothing bad has ever happened. What should you do?
- A:** We have safety procedures for a reason: to ensure that employee safety always comes first. Don't wait for something bad to happen; raise your concerns about the situation to another member of management or Human Resources immediately.

Additional Details:

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



San Diego, United States

Workplace Security

At Qualcomm, all employees are active in helping to create and maintain a secure environment to promote the safety of our employees and the security of our 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 we report lost or stolen badges immediately. We also manage our visitors by ensuring they are escorted at all times, and we never prop locked doors open.

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 buildings without an escort, any personal threats or threatening behaviors, and other illegal or bothersome activities.

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

- Threaten or intimidate anyone – directly or indirectly.
- Commit any type of act of violence.
- Possess weapons of any kind on Qualcomm property, including Company parking areas, consistent with local law.
- Violate Company policies that prohibit the unlawful use, distribution, possession, or sale of alcohol, drugs or other controlled substances.

In addition, we protect our both intellectual and personal property by locking our computers when we walk away from them, and 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 also placed in secure shred boxes when they are no longer needed.

Finally, we are good corporate citizens. We leave a note when we bump someone's car, we turn in property that has been left behind, and we let each other know when we see a potential security threat.

Additional Details:

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





Respecting Personal Information

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

Lead the Way

We take precautions to carefully protect the privacy of:

Our customers

We embody our Privacy Guiding Principles and follow our Customer Personal Information Policy when developing products and services and handling our customers' and consumers' personal information.

Our fellow Qualcommers

We collect and manage personal employee information in a manner that respects employee privacy and complies with applicable laws. If your job responsibilities involve the collection or management of this information, you should know and comply with these laws and applicable Company policy.

Additional Details:

→ [Privacy site](#) (go/privacy)

→ [Privacy team](mailto:privacy@qualcomm.com) (privacy@qualcomm.com)

Personal information can include:

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



Bangalore, India



The Way We Protect Our Tools for Innovation

Throughout its history, Qualcomm has made the impossible possible, driving technology leadership and continually raising the bar. One way we do this? We safeguard 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 treasury assets. Equally important are our intangible resources, which include our ideas, business strategies, and other intellectual property that keep us on the cutting edge. It's up to each of us to protect these resources.

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Keeping Information Confidential

Our industry is competitive. It is critical that we maintain our industry leadership – and the trust of our consumers and partners – by always protecting confidential information, whether it's information about our Company, our customers, 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.** We don't disclose or distribute this information unless there is a legitimate business need and it has been authorized by Qualcomm.
- **We use information responsibly.** We only use this information to perform our job duties.
- **We're secure.** We adhere to Qualcomm's security policies and procedures, as well as document control processes. We also guard our Company passwords.
- **We watch where we talk.** We don't discuss confidential information in places where others could overhear it, such as at a trade show or in an airplane, train, or elevator.

- **We avoid receiving confidential information when possible.** Before entering into a Non-Disclosure Agreement (NDA) with a third party, we should consider whether it is possible to maintain a business relationship without exchanging confidential information. Avoiding this exchange can help to prevent accusations of being swayed by that knowledge when developing similar products or businesses.
- **We respect obligations we assume in NDAs.** Before disclosing information that may be confidential – whether oral, visual, or written – we must execute a written NDA approved by the Legal Department. We never use, copy, distribute, or disclose confidential information outside the terms of the NDA.
- **We recognize that our confidentiality commitment is long-lasting.** Our obligations to maintain the confidentiality of both Company and third-party information continue even if employment with Qualcomm ends. Anyone leaving the Company must immediately return all Qualcomm property, including documents and media that contain Qualcomm confidential information, as well as any third-party confidential information received during their employment at Qualcomm.



Cambridge, United Kingdom

Keeping Information Confidential continued

The Legal Department is a valuable resource when it comes to confidential information concerns. Consult them if:

- You know of or suspect an inappropriate attempt to obtain Qualcomm confidential information.
- You receive information that you believe may be third-party confidential information or may have restrictions on its use.

Our Code at Work

Q: You're at the airport when your manager calls to discuss the details of a new product Qualcomm is developing. You look around and see lots of people – but not anyone you know. Should you continue the conversation?

A: No. You should always carefully protect our Company's confidential information – especially in public places. Don't take chances; even a small, inadvertent disclosure can cause harm. You never know who is listening.

Additional Details:

- [Company Confidential Information Policy \(go/cci\)](#)
- [QSAFE site \(go/qsafe\)](#)
- [Request an NDA \(go/NDA\)](#)

Qualcomm confidential information includes any Company information not generally known to the public or the industry. Examples of such information include:

- Technical or engineering information for current and future products
- Services or research information
- 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 under a non-disclosure agreement (NDA)



Protecting the Power of Ideas

Qualcomm's valuable intellectual property (IP) portfolio and licensing business generate a substantial portion of our overall revenue. So we understand the power of ideas – and how critical it is to protect them.

Lead the Way

Qualcomm owns the rights to anything our employees develop or create, 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 – All use, review, and development of Open Source Software should be performed in compliance with our Open Source Group's policies and procedures. In particular, before committing to the use of any open source software in Company products, file an Open Source Request or reach out to your Trusted Advisor.

Industry Associations & Standard Setting

Organizations (SSOs) – To ensure that all memberships are appropriate, and that the Company is in a position to comply with all membership terms, employees involved in these types of organizations must first get approval from a manager and the Standards Review Team, including the Qualcomm lead for that industry group. If approved, they must:

- Follow the appropriate policies and procedures.
- Comply with all applicable competition 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 SSO.
- Contact Qualcomm Technology Licensing (QTL) with questions or to get approval on entering into agreements.

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 never bring to Qualcomm confidential and proprietary information that came from or may belong to a former employer. In addition, we have a duty to make sure that all third-party software we are using is appropriately licensed and that we are using it only in accordance with the terms of the license.

If you have any questions or concerns about intellectual property, consult the Legal Department.

Protecting the Power of Ideas continued

Our Code at Work

Q: You are an engineer working on the implementation of new system protocol. This project sparked an idea for you – it's a new framework that 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?

A: Because you are a Qualcomm employee and this idea is related to Qualcomm's business, Qualcomm may 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, but these matters should be discussed with the Legal Department (including in the country where you are located) to determine the appropriate course of action.

Additional Details:

- [Electronic Media Policy \(go/media\)](#)
- [Open Source Policy and process \(go/oslg\)](#)
- [Standards & Industry Organizations Policies and site \(go/standards\)](#)
- [CCI Policy \(go/ccli\)](#)
- [Standards Review team \(qtl.standards@qualcomm.com\)](mailto:qtl.standards@qualcomm.com)

"Intellectual property" refers to:

Anything we create on Company time, at Qualcomm's expense, or within the scope of Qualcomm's business interests. Examples include ideas, inventions, designs, strategies, and plans.



Safeguarding Our Electronic Assets

Lead the way

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

- Qualcomm's e-media is Company property and is provided for business purposes.
- Use of Company e-media systems is permitted, as long as you: (1) do not violate the law or our company policies and (2) recognize that such use can and will be monitored as noted below.
- To protect Qualcomm's legitimate interests and for the safety and security of our employees and property, the Company monitors our e-media and data transferred over Qualcomm's networks. Monitoring includes review of content sent from/to Company and web email accounts and online browsing activities. 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, or store material that is unlawful, inappropriate, offensive, or creates an excessive strain on our systems.
- Read and be familiar with the applicable policies, including our policies for electronic media.

If you suspect or know of potential theft, fraud, mishandling, or misuse of any type of Qualcomm property, it's your responsibility to raise your concerns immediately to any member of management, Global Security, or Human Resources.

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

- Computers
- Network and Internet access
- Phones
- Instant messenger systems
- Email

Our Code at Work

Q: A co-worker told me that he occasionally downloads full-length movies from the internet. He does it during his lunch hour and doesn't circulate the videos to anyone else. Is this okay?

A: No. Downloading large files, such as movies, puts a strain on system resources and is an improper use of Company equipment and networks. It puts our systems at risk for viruses and malware, and it also may be illegal.

Additional Details:

→ [Electronic Media \("E-Media"\) Policy \(go/emedial\)](#)

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 and are frugal wherever possible.

Lead the Way

Spending money on behalf of Qualcomm requires us to be careful and deliberate in our decisions. Some helpful guidelines to keep in mind are:

- Do not charge personal expenses to the Company.
- Ensure expenses are moderate, reasonable, and not excessive for the situation.
- Follow all of Qualcomm's travel expense policies or travel-related expense policies.
- Select venues that are appropriate for business and local customs and that support Qualcomm's values.
- Seek appropriate approvals on expenditures per Company policies.
- Give primary consideration to vendors designated by the Company to be used for specific purchases.

- Provide the appropriate documentation when submitting expenses for reimbursement, including receipts, invoices, or notes.
- When unsure if an expense is appropriate or reasonable, seek guidance and ask questions of your management and/or finance team.

Note for Managers: You are responsible and accountable for expenses incurred and budgets established by those in your organization. By approving expenses, you are indicating 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.

Additional Details:

→ [Travel Expenses](#) (go/travel)

→ [Expenditures Approvals](#) (go/approvals)



Farnborough, United Kingdom



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.

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Avoiding Conflicts of Interest

Conflicts of interest can occur when a personal interest or activity (like a gift, a personal relationship, or an outside interest) influences – or appears to influence – our ability to make an objective business decision. They erode trust and can damage reputations. At Qualcomm, each of us is expected to be transparent, avoid these conflicts, and ensure that we are always acting in the best interests of the Company.

Lead the Way

We are each responsible for actively avoiding any situation in which a conflict of interest might arise. And 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 improperly influence any business decision.

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 where the purpose of the meeting is to enhance the business relationship.

The giving of a gift, hospitality, or entertainment should not place the recipient under any obligation, and 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.



Avoiding Conflicts of Interest (continued)

Personal Relationships

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

Outside Activities

Unless otherwise approved by the Company, we are expected to devote our full business efforts to Qualcomm and should refrain from engaging in any outside business. In addition, we may not take for ourselves (or for another person) a business opportunity in which we think Qualcomm might be interested.

If you believe you are facing a conflict of interest, or observe a situation where a conflict of interest is presented, contact the Office of Compliance or email conflict-of-interest@qualcomm.com immediately.

Our Code at Work

Q: A vendor gives you a gift card as a token of appreciation around the holidays. It's not a frequent offer - what should you do?

A: Decline the gift card. Cash and cash equivalents (like a gift card) are never acceptable. Explain our policy to the vendor and politely decline. You can also discuss the situation with a manager or Human Resources.

Additional Details:

- [Conflicts of Interest Policy \(go/conflict\)](#)
- [Global FCPA and Anti-Corruption Policy \(go/fcpa\)](#)



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 relating to a company that is not available to the investing public and that 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 any derivative transaction in Qualcomm securities (e.g., puts, calls, publicly traded options) is also prohibited by our Insider Trading Policy, regardless of whether the transaction involves the use of material non-public information.

For guidance in this area, contact Corporate Legal or the Office of Compliance.



Jakarta, Indonesia



Avoiding Insider Trading

continued

Examples of information that could potentially be material, non-public information include:

- A company's 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.
- Actual or threatened litigation or regulatory action, and significant developments in such litigation or regulatory action.

Our Code at Work

Q: You have been designing a kitchen remodel for several months, and your intent has always been to sell some of your Qualcomm RSUs and ESPP shares to pay for the remodel. Prior to selling your Qualcomm stock, you learn that Qualcomm is in discussions to acquire another large company, and that information is not yet public. Since your proposed sale of Qualcomm stock has been planned for some time and is not based on this new information, is it OK to trade?

A: No! You may not trade in Qualcomm securities while in possession of material non-public information about Qualcomm.

Additional Details:

- [Insider Trading Policy \(go/insider\)](#)
- [Qualcomm's Stock site \(go/stock\)](#)

Selecting Our Suppliers

An open, honest, and fair selection process allows us to build supplier relationships based on mutual trust and ensure 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 who abide by both 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 accept money or benefit of any kind for any advice or services we provide to a supplier in connection with obtaining or retaining Qualcomm business, or for directing business to a supplier.
- When deciding among competing suppliers, 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 perform due diligence on customers and suppliers who wish to do business with Qualcomm and look out for "red flags" that may signal money laundering activities, like all-cash payments, payments made from an unknown source, or through a personal bank account.
- We should disclose actual or apparent [conflicts of interest](#) to a manager, Human Resources 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.

Our Code at Work

Q: You are involved in a supplier selection process, and your cousin works for one of the suppliers. You still plan to make your decision based solely on Qualcomm's best interests. Can you continue on in the selection process?

A: It depends. Be transparent about the relationship by reporting it to your manager. Although you may be prepared to make an objective decision, your relationship to one of the suppliers could give the appearance of an improper influence. By disclosing the potential conflict, you enhance your credibility in the process.

Additional Details:

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

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 and provide a snapshot of our Company's operations and financial standing. Qualcomm also uses these records to make important business decisions.

Lead the Way

Our Company records should always be complete, accurate, and understandable. We never make false or artificial 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 contract commitments should be in writing and uploaded into our contract management database pursuant to Company policies, and we are careful not to make business commitments outside of what is documented in these contracts, through side deals or otherwise.

Record Retention

We retain business records in accordance with the law, to the extent needed for business purposes, or longer if required by tax, works council agreements, regulatory, or other standards. Documents required for an audit, investigation, or other legal action should not be destroyed or discarded. If you receive a subpoena, a request for records, or other legal papers, notify the Legal Department immediately.

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, or the Business Conduct Hotline.

Even if maintaining books and records is not your primary job duty, we all record information of some kind and submit it to our Company.

This includes the information we provide in:

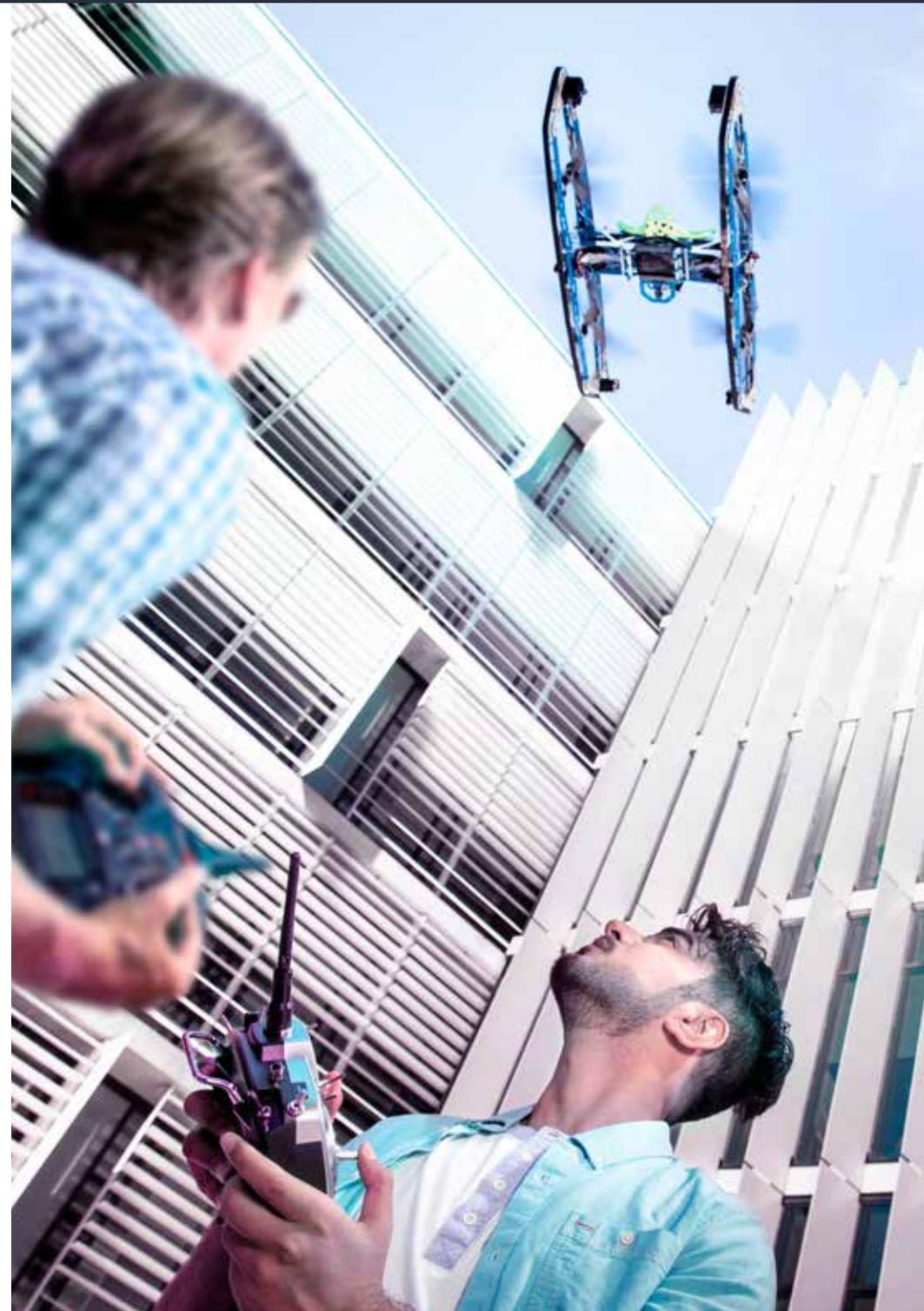
- Payroll documents
- Timecards
- Travel and expense reports
- Sales reports
- Customer and supplier records
- Design and engineering records
- Export and import records

Keeping Honest and Accurate Records continued

Our Code at Work

Q: After you finalize contract specifications for a customer, they request additional services. Since they're a major customer, you want to include these services at no cost. Getting approval and documentation for this deal will slow down the process, and you need to secure the contract quickly. Will a verbal agreement with the customer suffice?

A: No. In any situation where we are negotiating deals, we should consult with the Finance or Legal Department for assistance first. Whenever we want to include complimentary, discounted, or additional services to a customer, it's important to document this in the contract itself. Making deals outside of written contractual agreements can be a violation of our Code.



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 we never make misrepresentations or dishonest 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.

The Media

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 Marketing and Investor Relations.

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 caution in these situations, never disclosing confidential business information, or posting on behalf of Qualcomm.

Government Officials, Audits and Investigations

If asked to provide information in connection with Company investigations, audits, or other legal matters, you are required to cooperate, communicate clearly and in good faith, and ensure the auditor or investigator has a full and accurate understanding of the matter at hand. Refer requests from government officials and agencies to our Government Affairs Department or the Legal Department.

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

Our Code at Work

Q: You see an article posted on social media about the future of mobile technology – but the author of the article is wrong. You want to post a response, referencing your position at Qualcomm for credibility. Should you?

A: No. When posting on social media, you should never write anything that gives the appearance that you are speaking on behalf of Qualcomm.

Additional Details:

- [Electronic Media Policy \(go/media\)](#)
- [Social Media Policy \(go/socialmedia\)](#)
- [Disclosure Policy \(go/disclosure\)](#)



Shanghai, China

The Way We Follow the Law

As members of the global economy we uphold the law, working to ensure fairness in the marketplace, protection for consumers, and prevention of corruption and bribery. These laws protect our Company's interests and reputation – and we take ownership of the responsibility to abide by them.

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Ensuring Fair Competition

Qualcomm engages in vigorous, yet fair competition. We sell our products and services on their merits, not by unfairly limiting competition or obtaining competitive intelligence in a way that is unlawful or unethical.

Lead the Way

When promoting Qualcomm’s products and services, we act with personal integrity at all times, ensuring that our competitor comparisons are accurate, substantiated, and never misleading.

If a competitor attempts to discuss a 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 agree or exchange sensitive information with competitors.

Competitor Agreements

We abide by antitrust and competition laws wherever we operate and never agree with a competitor to limit competition. In fact, we avoid even the appearance of these improper agreements. 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.
- Boycott certain customers, suppliers, or competitors.

Competitive Intelligence

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

Even if there is no formal written agreement, the mere exchange of confidential information (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.



San Diego, United States

Ensuring Fair Competition continued

Our Code at Work

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

A: No. We respect the confidential and proprietary information of other companies, including our competitors. If there are any questions about using previously developed documents or tools, contact our Legal Department before copying, using, or disclosing the information.

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

Which Way?

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



Was the information obtained illegally?



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.

Preventing Bribery and Corruption

Bribery and corruption can have severe legal and economic repercussions for the individuals involved, for Qualcomm and ultimately for our industry and our customers. Qualcomm strictly prohibits all bribes, corrupt payments, kickbacks and other forms of commercial bribery involving private individuals or a Government Official. We must know and 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, as well as local anti-corruption laws.

Lead the Way

We take our responsibility for issue spotting and preventing bribery and corruption seriously, from understanding what constitutes a bribe to being aware of (and abiding by) the laws that address it. We comply with our policies and procedures, to ensure compliance with all applicable anti-corruption laws.

Bribes

We never offer or accept bribes, kickbacks, and other forms of improper benefits.

Government Officials

We do not – directly or indirectly – offer, make or give a bribe, kickback, payment, or anything of value to a government official (as defined in our Global FCPA and Anti-Corruption Policy) to persuade the official to violate their lawful duties, to secure an improper advantage, influence a decision, or to obtain or retain business.

Under FCPA, the term “Government Officials” has a broad definition and can refer to:

- Any employee of a non-United States Government
- An official or employee of a state-owned entity (SOE)
- Officials of public international organizations

If you are unsure whether a person you are dealing with is a government official, find out before offering, making or giving any payment or other benefit that could be determined improper.

Gifts or Other Benefits

Gifts and social amenities that are acceptable in commercial business relationships may be entirely unacceptable and even illegal when dealing with government officials. In countries where local customs call for giving gifts, make sure you understand the requirements of our Global FCPA and Anti-Corruption Policy, as our policy may be more restrictive than what local law or custom permits.

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

Third Party Engagements

Any Third-Party Representative, who may have interaction with Government Officials, as defined above, must be submitted for third-party review and due diligence.

Preventing Bribery and Corruption continued

Recordkeeping

We must maintain detailed records that accurately reflect all transactions and expenditures, especially if we are providing benefits to third party business partners. The substance underlying a transaction must always be fairly and accurately portrayed in Qualcomm's books and records.

Facilitating Payments

In some countries, payments called "facilitation" or "grease" payments that are made to government officials to expedite routine, non-discretionary governmental actions are common. Qualcomm does **not** permit such payments.

If you have any questions relating to bribery or our anti-corruption compliance program, seek advice from the Office of Compliance, the Legal Department, or our Global FCPA and Anti-Corruption Policy.

Our Code at Work

Q: You have been working on a business deal with an employee of a foreign government. You would like to give them an expensive bottle of wine to thank them for their hospitality during your visit. Is this acceptable?

A: No. Gifts to government officials should be carefully scrutinized, and an expensive bottle of wine would be improper. If you want to consider giving a token of appreciation, you must seek pre-approval and ensure that the gift is of modest value.

Additional Details:

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



Export and Import Compliance

As a global company, Qualcomm is subject to export 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 and Qualcomm policies and procedures in all our global activities led by both our Export Compliance and Import Compliance teams.

Export Controls, Boycotts, and Sanctions

- Exporting Qualcomm and third-party products, services, software, information, or technology (referred to as "Items") is subject to US, EU and/or other country export laws and regulations. Exports fall under three major categories: physical (shipments and hand-carries), electronic (emails, source code and software distribution), and verbal (support and services).
- If your job involves any export related activity, 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 are screened for potential risks and that proper documentation, such as licenses and authorizations, are in place.

- Boycotts and sanctions, along with applicable laws, vary from country to country. US anti-boycott laws are intended to discourage US businesses and their foreign branches, subsidiaries, and affiliates from participating in other countries' boycotts that the United States does not endorse. Sanctions can restrict activities such as transfers of assets, monetary payments, provisions of services, exports of sensitive technology, and travels to the affected countries or destinations.

Customs

- 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 how to properly conduct the activity and follow established policies and procedures. This includes using an approved shipping system which may lead to an additional authorization prior to executing any movements.

Export and Import Compliance continued

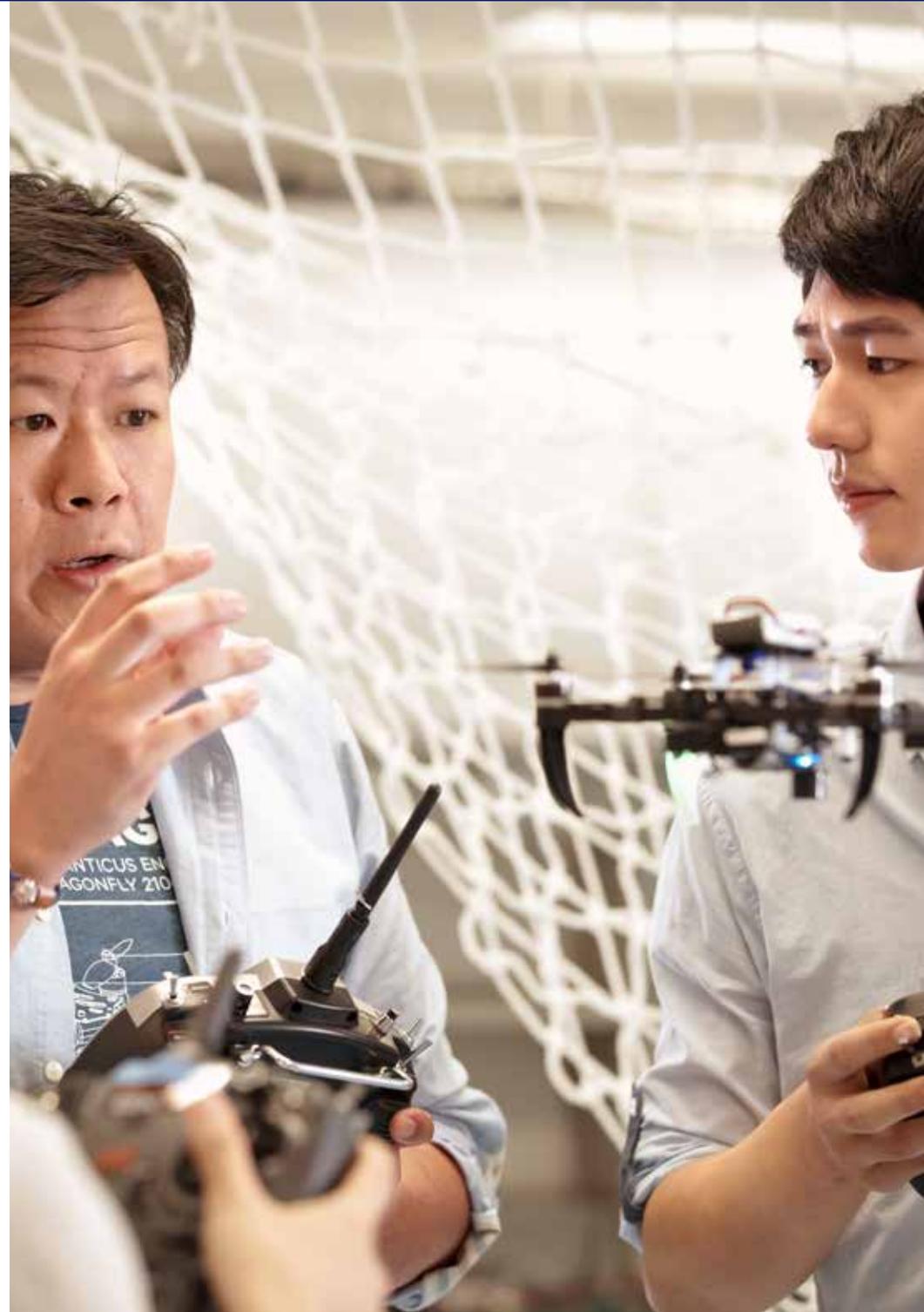
Supply Chain Security

- 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 how to properly conduct the activity and follow established policies and procedures.

Additional Details:

→ [Export Compliance](#) (go/exportcompliance)

→ [Import Compliance](#) (go/import)



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 industry-specific regulatory requirements that apply to our products in the countries where we operate. Regardless of location, each Qualcomm employee has the responsibility to follow 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, you should consult with the QCSS Legal Department to ensure that we are abiding by all applicable laws and regulations.

Additional Details:

→ [Qualcomm policies \(go/policies\)](https://www.qualcomm.com/go/policies)





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 consider our impact on our communities wherever we do business.

Protecting Our Environment	41
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Protecting Our Environment

Qualcomm is committed to minimizing impacts to the environment throughout our business. We build environmentally conscious practices into our 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 substance elimination programs, we address the environmental, safety, and health impacts of our products and operations.
- We practice the “precautionary principle,” taking preventative measures regarding certain chemicals, even if science hasn’t indicated clear environmental or health hazards.
- We expand our operations while aiming to minimize our carbon footprint, conserve water, and reduce waste.

Additional Details:

- [Qualcomm Sustainability webpage](#) (go/sustainability)
- [Product Responsibility](#)
- [Our Environmental Guiding Principles](#)



Cork, Ireland

Upholding Human Rights

We are committed to respecting human rights and avoiding complicity in any human rights abuse throughout our Company, our operations, our supply chains, and our communities.

Lead the Way

Our 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. 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, including wage and hour laws, and we support our business partners who do the same.
- We prohibit the use of child labor 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 prohibit forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery, 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 child, forced or slave labor, nor will we condone such practices.
- We recognize that employees have the right to associate freely, join labor unions, collectively bargain under local law, seek representation and join workers' councils in accordance with local laws.



Amsterdam, Netherlands

Upholding Human Rights

continued

- We work with our suppliers to ensure responsible sourcing of certain metals present in our products, especially those metals from the Democratic Republic of the Congo (DRC) and adjoining countries.
- We require our semiconductor 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.

Additional Details:

- [Universal Declaration of Human Rights](#)
- [United Nations Guiding Principles on Business and Human Rights](#)
- [UN Global Compact Principles](#)
- [Qualcomm's Commitment to Human Rights \(go/humanrights\)](#)
- [Responsible Business Alliance Code of Conduct](#)
- [Qualcomm's Conflict Free Minerals Policy](#)
- [Supply Chain Management](#)

Our Code at Work

Q: During an onsite visit to one of our suppliers, you see signs that lead you to suspect they may be committing a human rights violation. You're not sure, and the supplier is in a different country, with different laws and customs. Do you say something?

A: Yes. Regardless of laws or customs, we do not work with suppliers who engage in human rights violations. Report your concerns to Legal or Human Resources so that this can be investigated.



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. We never make any political contributions using Company funds or resources unless it is lawful and expressly authorized in writing by our CEO, President, SVP of Government Affairs, CFO, and a Vice President or above in the Corporate Legal Department. 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

- Q:** You are invited to speak at a campaign event for a political candidate that you support. Is this acceptable?
- A:** You can speak if the event happens on your own time, but do not mention our Company or suggest that you speak on its behalf.

Additional Details:

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

Giving Back to Our Communities

Qualcomm recognizes the importance of encouraging employees to give 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

Q: A charity you volunteer for has asked you to print out flyers for an upcoming event; the charity is not sponsored by our Company. Your co-worker suggests using the printer at work once everyone has gone home. What should you do?

A: You should not print them at work. If you choose to volunteer in charitable activities outside of work, never use Company time or resources unless you have permission.



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
- 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. Administered by a third party, it allows you to raise issues anonymously, where local country law permits. The Business Conduct Hotline website can help you find your local phone number or raise a concern via an online tool.

Don't know where to start? Email the Office of Compliance at Office-of-Compliance@qualcomm.com.

Photo credits

Employees share their amazing views from Qualcomm locations around the globe.

10	Jochen Hoidis	24	Ramanathan Subramanian
13	Bharath Tirunagaru	26	Gustaff Mawuntu
15	Sandeep Sahu	32	Bruce Smith
17	Svetoslav Georgiev	33	Anuja Thakur
22	Ria Das	41	Aaron O'Connor

