

## **QUALCOMM POLITICAL CONTRIBUTIONS AND EXPENDITURES POLICY**

Existing and proposed laws, legislation, regulations and policy initiatives, including but not limited to those concerning the telecommunications industry, intellectual property rights, spectrum, tax, trade, research and development, and immigration, may have a profound impact on the Company and its business. Accordingly, the Company believes that it is important to engage in constructive and responsible participation in the political process from time to time.

Qualcomm is committed to abiding by all applicable laws and regulations regarding political contributions and expenditures throughout the world. In addition, the Company's political contributions are subject to the approval of senior management and oversight by the Governance Committee of the Board of Directors.

No Company resources, including the use of Company premises, use of Company equipment, or monetary payments, may be contributed to any political candidate, political committee (other than for the administrative or solicitation expenses of the QUALCOMM Political Action Committee, as permitted by law), political party, ballot measure committee, or to any other organization for use in making Political Expenditures (as defined at the conclusion of this policy) without specific approval and disclosure as set forth herein.

### **Promotion of Company Interests**

- All Political Expenditures made with Company funds or resources will promote the interests of the Company, and will be made without regard for the personal political preferences of Company officers or executives.

### **Approvals**

- No Political Expenditures shall be made using Company funds or resources to, or in support of, any political candidate, political campaign, political party, political committee, or public official in any country, or to any other organization for use in making Political Expenditures, unless the contribution is lawful and expressly authorized in writing by the Company's Chief Executive Officer, President, Chief Financial Officer, Senior Vice President of Government Affairs, and a Vice President or above in the Corporate Legal Department, to ensure consistency with the Company's business objectives and public policy priorities.
- Any employee who believes that a payment using Company funds that the employee has requested may be used in making Political Expenditures must contact the Office of the Senior Vice President for Government Affairs to determine whether the payment requires the approvals specified in the preceding paragraph.

### **Oversight**

- The Governance Committee of the Company's Board of Directors, which consists solely of independent directors, shall be responsible for overseeing the Company's political activity and contributions, including Political Expenditures to trade associations or other organizations, to ensure consistency with the Company's business objectives and public policy priorities.

- The Governance Committee shall no less than annually receive and review a report on the Company's political contributions and expenditures.
- The Governance Committee shall also annually review this Policy.

## **Employees**

- Employees may participate in political activities of their choice on an individual basis, with their own money and on their own personal time, subject to compliance with all applicable laws and Company policies. Employees should always make clear that personal political activities and contributions are their own, and should not be attributed to the Company. Employees will not be reimbursed, directly or indirectly, for personal political contributions or expenses. The Company will not pressure or coerce employees to make personal political contributions or take retaliatory action against those who do not.

## **Federal Political Contributions**

- Direct corporate contributions to federal candidates, federal campaign committees, national political party committees, and all other federal political committees (except for independent expenditure-only committees) are prohibited by federal law. Accordingly, the Company shall not make such contributions.
- The Company shall not make contributions to federal independent expenditure-only committees.
- Contributions to federal candidates and federal political committees may be made by the QUALCOMM Political Action Committee (QPAC), a federally-registered political committee. Consistent with federal law, the Company pays the administrative costs of maintaining QPAC, but all contributions to QPAC are made by eligible Qualcomm personnel, on a voluntary basis.
- Information regarding QPAC contributions and expenditures is publicly reported and available on the website of the Federal Election Commission, and as described below, will also be posted to Qualcomm's website and updated at least twice annually.

## **State and Local Political Contributions**

- Where permitted by law, and with the required internal approvals specified above, the Company may participate in the political process at the state and local level by contributing to political candidates, political parties, political committees and ballot initiatives.
- Information regarding such state and local corporate political contributions is publicly reported on state and local election agency websites, and will also be posted to Qualcomm's website and updated at least twice annually.
- If the Company chooses to make a contribution to a political committee that is a state or local independent expenditure-only committee, the contribution would be publicly disclosed as required by law on state and local election agency websites, and will also be posted to Qualcomm's website, which will be updated at least twice annually.

## **Policy Advocacy/Lobbying**

- Company employees and third party representatives advocate for the Company's business interests and public policy positions at various levels of government.
- The Company complies with all federal, state and local laws that require disclosure of lobbying activities, including the federal Lobbying Disclosure Act and the Honest Leadership and Open Government Act.
- Information regarding the Company's federal lobbying activities is publicly reported and available on the websites of the U.S. Senate and U.S. House of Representatives.
- Information regarding the Company's lobbying activities in states and localities, if any, is reported publicly through the relevant state and local lobbying compliance agencies, where required by law.

## **Website Disclosure**

Qualcomm believes that transparency is vital to promote a strong and thriving democracy, as well as to preserve the integrity of the American electoral process. To ensure that Qualcomm's own political activities are transparent to the Company's stockholders and other stakeholders, the Company will disclose those activities as follows:

- The Company shall post to its website and update at least twice annually all monetary and non-monetary corporate contributions, if any, to political candidates, political parties, and other political organizations established under Section 527 of the Internal Revenue Code, including recipient names and amounts given.
- The Company shall post to its website and update at least twice annually all contributions made by Qualcomm's federal political action committee, QPAC, and by any state or local political action committees established by Qualcomm, including recipient names and amounts given.
- The Company has not made in the past, and does not plan to make in the future, any independent expenditures on behalf of federal candidates. If our position on making independent expenditures changes, that declaration would be made on the Company's website and the independent expenditures would be posted to the Company's website and updated at least twice annually and disclosed through Federal Election Commission reports required by law.
- The Company shall post to its website and update at least twice annually all payments of dues and special assessments made through its Government Affairs department to US-based trade associations receiving annually \$25,000 or more in total payments. The Company will disclose the portion of those dues and special assessments that were used for activities that are not deductible under Chapter 162(e) of the Internal Revenue Code, if such information is available after making reasonable efforts to obtain the information from the associations. The Company shall disclose if any trade association payment made through its Government Affairs department was designated by the Company, or solicited by the trade association, to be used for Political Expenditures.

- The Company shall post to its website and update at least twice annually payments of \$10,000 or more, if any, that are made to 501(c)(4) social welfare organizations through the Company's Government Affairs department.
- The Company shall post to its website and update at least twice annually Company contributions, if any, made to influence the outcome of ballot measures, including recipient names and amounts given.
- The Company's disclosures, as described above, for the most recent fiscal year shall be set forth in a report posted on its website, which report can be found [here](#).
- The Company shall maintain on its website an archive of its prior fiscal year reports on political contributions and expenditures, which archive can be found [here](#).
- In the aforementioned report, the Company shall indicate its adherence to this Policy.

### **Definitions**

- "Political Expenditures" means all monetary and non-monetary payments that the Company intended to be used, or had reason to believe would be used, to participate in or influence public opinion with respect to any political campaign on behalf of or in opposition to any candidate for public office or any voter referenda ballot measures, including but not limited to all funds meeting the above description that were provided to any candidate, candidate committee, political organization, political party, business association, advocacy organization, educational group, media organization, political action committee, or any other comparable entity, whether or not it qualifies as a 501(c)(4) organization.