

**Company Name** Qualcomm  
**Industry** ICT (Supply Chain only)  
**Overall Score (\*)** 8.0 out of 100

Theme Score	Out of	For Theme
1.1	10	A. Governance and Policies
0.0	25	B. Embedding Respect and Human Rights Due Diligence
0.8	15	C. Remedies and Grievance Mechanisms
1.7	20	D. Performance: Company Human Rights Practices
1.6	20	E. Performance: Responses to Serious Allegations
2.8	10	F. Transparency

(\*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### A. Governance and Policies (10% of Total)

#### A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: General HRs commitment: The Company states that it is committed to respecting human rights and avoiding complicity in any human rights abuse, throughout its company, operations and communities. [Commitment to Human Rights: <a href="http://qualcomm.com">qualcomm.com</a>]</li> <li>Met: UNGC principles 1 &amp; 2: The Company is a signatory to UN Global Compact since 2013. [UN Global Compact: <a href="http://unglobalcompact.org">unglobalcompact.org</a> &amp; Commitment to Human Rights: <a href="http://qualcomm.com">qualcomm.com</a>]</li> <li>Not met: UDHR: The Company states that its 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. However, "guided by" is not considered formal commitment to the initiative following CHBR wording criteria. [Commitment to Human Rights: <a href="http://qualcomm.com">qualcomm.com</a>]</li> <li>Not met: International Bill of Rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: UNGPs</li> <li>Not met: OECD</li> </ul>
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: UNGC principles 3-6: The Company is a signatory to UN Global Compact. [UN Global Compact: <a href="http://unglobalcompact.org">unglobalcompact.org</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Explicitly list ALL four ILO for ICT suppliers: The Company discloses that "As a member of the Responsible Business Alliance (RBA), we have adopted the RBA Code of Conduct in our own operations and as our supplier code of conduct, and we expect all of our suppliers to act in accordance with this code". The RBA Code of Conduct includes provisions in relation to forced labour, child labour and discrimination. In relation to freedom of association and collective bargaining, it states the following: 'In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities.' 'However, it is not clear whether the Company is respecting those rights in all contexts, as it indicates 'in conformance with local law'. [Code of Business Conduct, 29/05/2016: <a href="http://qualcomm.com">qualcomm.com</a> &amp; Responsible Business Alliance Code of Conduct, 2018: <a href="http://responsiblebusiness.org">responsiblebusiness.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Explicit commitment to All four ILO Core</li> <li>• Met: Respect H&amp;S of workers: The Company states that it is committed to conducting its operations and activities in a manner that provides and maintains safe, healthful, and productive working conditions. Its Injury and Illness Prevention Plan provides clear, consistent and regulatory-compliant policies and protocols for managing health and safety. [Code of Business Conduct, 29/05/2016: <a href="http://qualcomm.com">qualcomm.com</a> &amp; Commitment to Human Rights: <a href="http://qualcomm.com">qualcomm.com</a>]</li> <li>• Met: H&amp;S applies to ICT suppliers: The RBA Code of Conduct requires its participants, the Company's suppliers, to recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Health and safety standards include Occupational Safety, Occupational Injury and Illness, Industrial Hygiene and so on. [Responsible Business Alliance Code of Conduct, 2018: <a href="http://responsiblebusiness.org">responsiblebusiness.org</a>]</li> <li>• Not met: working hours for workers: The Company states that it complies with applicable labor laws, including wage and hour laws. However, it does not have requirements on resting periods. [Code of Business Conduct, 29/05/2016: <a href="http://qualcomm.com">qualcomm.com</a>]</li> <li>• Not met: Working hours for ICT suppliers: The RBA Code of Conduct includes that working hours are not to exceed the maximum set by local law. However, it does not have requirements on resting periods. [Responsible Business Alliance Code of Conduct, 2018: <a href="http://responsiblebusiness.org">responsiblebusiness.org</a>]</li> </ul>
A.1.3.ICT.a	Commitment to responsible sourcing of minerals	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Responsible mineral sourcing in conflict areas: The Company states that it strives to provide Democratic Republic of the Congo (DRC) conflict free products by supporting industry-wide efforts to drive transparency in the supply chain and by expecting that its suppliers obtain materials from environmentally and socially responsible sources, including conflict free sources within the DRC and adjoining countries. The company's due diligence framework was designed to conform to OECD Due Diligence Guideline. However, it is not clear if the commitment is extended to high risk areas beyond DRC and adjoining countries. [Conflict Free Minerals Policy: <a href="http://qualcomm.com">qualcomm.com</a> &amp; Code of Business Conduct, 29/05/2016: <a href="http://qualcomm.com">qualcomm.com</a>]</li> <li>• Met: Based on OECD Guidance: The Company states that it has a management system to help source conflict minerals responsibly from the region, identify and assess risk in the supply chain, and design and implement strategies to respond to risk, in accordance with the Organization for Economic Co-operation and Development (OECD) due diligence framework. [Supply Chain Management: <a href="http://qualcomm.com">qualcomm.com</a>]</li> <li>• Not met: Requires responsible mineral sourcing from suppliers: The Company states that 'We monitor their [suppliers] processes and materials and continually work to make our products as sustainable as economically and technically possible. Beyond the manufacture of our products, we also work with suppliers to meet our other sustainability expectations: respect for human rights; responsible sourcing of minerals; water, energy and other resource conservation'. However, no evidence of a commitment to responsible sourcing in conflict affected and high risk countries and this being based on OECD Guidance for suppliers. [Supply Chain Management: <a href="http://qualcomm.com">qualcomm.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Responsible conflict mineral sourcing covers all minerals</li> <li>• Not met: Suppliers expected to make similar requirements of their suppliers</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.3.ICT.b	Commitment to respect human rights particularly relevant to the industry (ICT)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Women's Rights</li> <li>• Not met: Children's Rights</li> <li>• Not met: Migrant worker's rights: The Company requires its suppliers to comply to the RBA Code of Conduct which contains a commitment to migrant workers rights. However there is no evidence of this commitment in the company's own Code of Conduct.</li> <li>• Met: Expecting suppliers to respect these rights: The Company indicates that it has adopted the RBA Code of Conduct as its supplier Code of Conduct and requires its suppliers to comply with the Code. The RBA code contains the following commitment to migrant workers rights 'Participants are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including...migrant...and any other type of worker'. [Supply Chain Management: <a href="http://qualcomm.com">qualcomm.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: CEDAW/Women's Empowerment Principles</li> <li>• Not met: Child Rights Convention/Business principles</li> <li>• Not met: Convention on migrant workers</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	Commitment to engage with stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to stakeholder engagement: Qualcomm discloses that 'conversations with our key stakeholders are essential to assuring that our sustainability strategy aligns with the current needs of our business and meets the expectations of the people, organizations and communities that have an interest in our Company'. However, the Company does not explicitly states that is committed to engage with its stakeholders. [Our Stakeholder engagement: <a href="http://qualcomm.com">qualcomm.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Regular stakeholder engagement</li> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement</li> </ul>
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to remedy</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with ICT suppliers to remedy impacts</li> </ul>
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Zero tolerance attacks on HRs Defenders (HRDs)</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Expects ICT suppliers to reflect company HRD commitments</li> </ul>

### A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: CEO or Board approves policy</li> <li>• Not met: Board level responsibility for HRs: The Company discloses that its 'QSR Leadership Committee provides guidance on global sustainability issues that are most important to Qualcomm and our key stakeholders so that sustainability remains a central component of our business strategy. Composed of executives and senior management from across the Company, including human resources, legal, government affairs, supply chain, investor relations and finance, this Committee reports annually on our sustainability policies, programs and performance to the Governance Committee of our Board of Directors'. However, there is no explicit description about the board level responsibility for human rights. [Sustainability Strategy: <a href="http://qualcomm.com">qualcomm.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Board/Committee review of salient HRs</li> <li>• Not met: Examples or trends re HR discussion</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not met: Both examples and process
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Incentives for at least one board member • Not met: At least one key ICT HR risk, beyond employee H&S Score 2 • Not met: Performance criteria made public

## B. Embedding Respect and Human Rights Due Diligence (25% of Total)

### B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commits to ILO core conventions: See A.1.2 [Code of Business Conduct, 29/05/2016: <a href="http://qualcomm.com">qualcomm.com</a> & Commitment to Human Rights: <a href="http://qualcomm.com">qualcomm.com</a> ] • Not met: Senior responsibility for HR Score 2 • Not met: Day-to-day responsibility • Not met: Day-to-day responsibility for ICT in supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Senior manager incentives for human rights • Not met: At least one key ICT HR risk, beyond employee H&S Score 2 • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: HR risks is integrated as part of enterprise risk system Score 2 • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commits to ILO core conventions: See indicator A.1.2 [Code of Business Conduct, 29/05/2016: <a href="http://qualcomm.com">qualcomm.com</a> & Commitment to Human Rights: <a href="http://qualcomm.com">qualcomm.com</a> ] • Not met: Communicates its policy to all workers in own operations Score 2 • Not met: Commits to all 4 ILO core conventions • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2 [Responsible Business Alliance Code of Conduct, 2018: <a href="http://responsiblebusiness.org">responsiblebusiness.org</a> ] • Not met: Communicating policy down the whole ICT supply chain • Not met: Requiring ICT suppliers to communicate policy down the chain Score 2 • Not met: How HR commitments made binding/contractual • Not met: Including on ICT suppliers
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Scores at least 1 on A.1.2 • Not met: Trains all workers on HR policy commitments • Not met: Trains relevant ICT managers including procurement Score 2 • Not met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Scores at least 1 on A.1.2 • Not met: Monitoring implementation of HR policy commitments • Not met: Monitoring ICT suppliers Score 2 • Not met: Score of 2 on A.1.2 • Not met: Describes corrective action process

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of ICT supply chain monitored</li> </ul>
B.1.7	Engaging business relationships	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: HR affects ICT selection of suppliers</li> <li>• Not met: HR affects on-going ICT supplier relationships</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Not met: Working with ICT suppliers to improve performance</li> </ul>
B.1.8	Approach to engagement with potentially affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Stakeholder process or systems</li> <li>• Not met: Frequency and triggers for engagement</li> <li>• Not met: Workers in ICT SC engaged</li> <li>• Not met: Communities in the ICT SC engaged</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Analysis of stakeholder views and company's actions on them</li> </ul>

## B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Identifying risks in own operations</li> <li>• Not met: Identifying risks in ICT suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Not met: In consultation with stakeholders</li> <li>• Not met: In consultation with HR experts</li> <li>• Not met: Triggered by new circumstances</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Salient risk assessment (and context)</li> <li>• Not met: Public disclosure of salient risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks</li> <li>• Not met: Including in ICT supply chain</li> <li>• Not met: Example of Actions decided</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: System to check if Actions are effective</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Comms plan re identifying risks</li> <li>• Not met: Comms plan re assessing risks</li> <li>• Not met: Comms plan re action plans for risks</li> <li>• Not met: Comms plan re reviewing action plans</li> <li>• Not met: Including ICT suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>

## C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Channel accessible to all workers: The Company states that employees can discuss any concerns through various ways including ethics mail, business conduct hotline and email of the Office of Compliance. [Code of Business Conduct, 29/05/2016: <a href="http://qualcomm.com">qualcomm.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Number grievances filed, addressed or resolved</li> <li>Not met: Channel is available in all appropriate languages</li> <li>Not met: Expect ICT supplier to have equivalent grievance systems</li> <li>Not met: Opens own system to ICT supplier workers</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Grievance mechanism for community</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Describes accessibility and local languages</li> <li>Not met: Expects ICT supplier to have community grievance systems</li> <li>Not met: ICT supplier communities use global system</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Engages users to create or assess system</li> <li>Not met: Description of how they do this</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Engages with users on system performance</li> <li>Not met: Provides user engagement example on performance</li> <li>Not met: ICT suppliers consult users in creation or assessment</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Response timescales</li> <li>Not met: How complainants will be informed</li> <li>Not met: Who is handling the complaint</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Escalation to senior/independent level</li> </ul>
C.5	Commitment to non-retaliation over complaints or concerns made	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Public statement prohibiting retaliation: The Company states that it will not tolerate retaliation against anyone for raising concerns in good faith regarding an actual or suspected violation of its Code, Company policy, or the law. However, there is no information on retaliation against external stakeholders. [Code of Business Conduct, 29/05/2016: <a href="http://qualcomm.com">qualcomm.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Practical measures to prevent retaliation</li> <li>Not met: Has not retaliated in practice</li> <li>Not met: Expects ICT suppliers to prohibit retaliation</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Won't impede state based mechanisms</li> <li>Not met: Complainants not asked to waive rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Will work with state based or non judicial mechanisms</li> <li>Not met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Describes how remedy has been provided</li> <li>Not met: Says how it would remedy key sector risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Changes introduced to stop repetition</li> <li>Not met: Approach to learning from incident to prevent future impacts</li> <li>Not met: Evaluation of the channel/mechanism</li> </ul>

## D. Performance: Company Human Rights Practices (20% of Total)



Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Living wage in supplier code or contracts: The RBA Code of Conduct states that compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. However, no evidence found in relation to living wage. [Responsible Business Alliance Code of Conduct, 2018: <a href="https://responsiblebusiness.org">responsiblebusiness.org</a>]</li> <li>• Not met: Improving living wage practices of suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends demonstrating progress</li> </ul>
D.4.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Avoids business model pressure on HRs</li> <li>• Not met: Positive incentives to respect human rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
D.4.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Identifies suppliers back to product source</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Discloses significant parts of supply chain and why</li> </ul>
D.4.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Child Labour rules in codes or contracts: The RBA Code includes requirements on child labour. However, there is no information on verifying the age of job applicants and workers. [Responsible Business Alliance Code of Conduct, 2018: <a href="https://responsiblebusiness.org">responsiblebusiness.org</a> &amp; Supply Chain Management: <a href="https://qualcomm.com">qualcomm.com</a>]</li> <li>• Not met: How working with suppliers on child labour</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends demonstrating progress</li> </ul>
D.4.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Debt and fees rules in codes or contracts: The Company indicates it has adopted the RBA Code of Conduct and that its suppliers are expected to adhere to the requirements within the code, which states 'forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used...workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker'. [Supply Chain Management: <a href="https://qualcomm.com">qualcomm.com</a> &amp; Responsible Business Alliance Code of Conduct, 2018: <a href="https://responsiblebusiness.org">responsiblebusiness.org</a>]</li> <li>• Not met: How working with suppliers on debt &amp; fees</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.4.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Free movement rules in codes or contracts: The Company indicates it has adopted the RBA Code of Conduct and that its suppliers are expected to adhere to the requirements within the code, which states 'All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law.' [Supply Chain Management: <a href="https://qualcomm.com">qualcomm.com</a> &amp; Responsible Business Alliance Code of Conduct, 2018: <a href="https://responsiblebusiness.org">responsiblebusiness.org</a>]</li> <li>• Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: FoA &amp; CB rules in codes or contracts: The RBA Conduct includes requirements on freedom of association and collective bargaining. However, there is no information on prohibition of retaliation against union members or representatives. [Responsible Business Alliance Code of Conduct, 2018: <a href="https://responsiblebusiness.org">responsiblebusiness.org</a> &amp; Supply Chain Management: <a href="https://qualcomm.com">qualcomm.com</a>]</li> <li>Not met: How working with suppliers on FoA and CB</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> <li>Not met: Provide analysis of trends in progress made</li> </ul>
D.4.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Sets out clear Health and Safety requirements: The RBA Code of Conduct requires its participants, the Company's suppliers, to recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Health and safety standards include Occupational Safety, Occupational Injury and Illness, Industrial Hygiene and so on. [Responsible Business Alliance Code of Conduct, 2018: <a href="https://responsiblebusiness.org">responsiblebusiness.org</a> &amp; Supply Chain Management: <a href="https://qualcomm.com">qualcomm.com</a>]</li> <li>Not met: Injury rate disclosures</li> <li>Not met: Lost days or near miss disclosures</li> <li>Not met: Fatalities disclosures</li> <li>Not met: Occupational disease rates</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: How working with suppliers on H&amp;S</li> <li>Not met: Provide analysis of trends in progress made</li> </ul>
D.4.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Women's rights in codes or contracts</li> <li>Not met: How working with suppliers on women's rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both requirement under score 1 met</li> <li>Not met: Provide analysis of trends in progress made</li> </ul>
D.4.9.b	Working hours (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Working hours in codes or contracts: The RBA Code of Conduct states that working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days. However, no evidence found of references to international standards, standard weekly hours. In addition, it not clear what 'exceptional or unusual situations' would be. [Responsible Business Alliance Code of Conduct, 2018: <a href="https://responsiblebusiness.org">responsiblebusiness.org</a>]</li> <li>Not met: How working with suppliers on working hours</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> <li>Not met: Provide analysis of trends in progress made</li> </ul>
D.4.10.a	Responsible Mineral Sourcing: Arrangements with Suppliers and Smelters/Refiners in the Mineral Resource Supply Chains	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Responsible mineral sourcing due diligence in supplier contracts: The Company requires that direct suppliers act in accordance with the RBA Code of Conduct. The RBA Code of Conduct states that participants shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Participants shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request. However, there is no evidence of commercial contracts or written agreements with suppliers. It is also unclear if the due diligence must be in accordance with the OECD Guidance. [Responsible Business Alliance Code of Conduct, 2018: <a href="https://responsiblebusiness.org">responsiblebusiness.org</a> &amp; 2018 Conflict Minerals Report, 2018: <a href="https://qualcomm.com">qualcomm.com</a>]</li> <li>Not met: Builds capacity with smelters/refiners</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Disclosure of smelter information in supplier requirements</li> <li>Not met: Responsible conflict mineral sourcing covers all minerals</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.10.b	Responsible Mineral Sourcing: Risk Identification in Mineral Supply Chain	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not met: Risk identification and disclosure in line with OECD Guidance: The Company indicates that it uses CMRT [Conflict Minerals Reporting Template] to identify conflict minerals processing facilities when reported in the supply chain, and obtains countries of origin information (when available) for RMAP-conformant processing facilities. 'We conduct on-site and remote assessments of select direct suppliers' due diligence activities to validate CMRT responses and ensure our supplier requirements are being met.' However, no further details found, including which are the different risks identified. [2018 Conflict Minerals Report, 2018: <a href="http://qualcomm.com">qualcomm.com</a>]</li> <li>Met: Identification of smelter/refiners and OECD due diligence: 'We use the CMRT to identify conflict minerals processing facilities when reported in our supply chain by our direct suppliers.' 'We use the publicly available results of the RMAP, LBMA and RJC third-party audits to validate the responsible sourcing practices of processing facilities in our supply chain.' [2018 Conflict Minerals Report, 2018: <a href="http://qualcomm.com">qualcomm.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Discloses smelters/refiners judged in line with OECD due diligence: The Company provides tables of Conflict Minerals Processing facilities, which are reported by direct suppliers. There are three lists: RMAP-Conformant Processing Facilities as of January 31, 2019, Table 2. RMAP-Active Processing Facilities as of January 31, 2019, Eligible Processing Facilities (processing facilities that meet the definition of a smelter or refiner under the relevant RMAP standard, but are not participating in the RMAP) as of January 31, 2019. [2018 Conflict Minerals Report, 2018: <a href="http://qualcomm.com">qualcomm.com</a>]</li> <li>Not met: Responsible conflict mineral sourcing covers all minerals</li> </ul>
D.4.10.c	Responsible Mineral Sourcing: Risk Management in the Mineral Supply Chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not met: Describes mineral risk management plan for supply chain: 'We maintain a conflict minerals risk management plan that sets forth direct supplier risk management strategies ranging from continued procurement to disengagement at the discretion of management.' However, no further details found of specific measures to reduce risks, besides striving towards 'our goal of having the processing facilities that may supply conflict minerals contained in our products be 100% RMAP-Conformant'. [2018 Conflict Minerals Report, 2018: <a href="http://qualcomm.com">qualcomm.com</a>]</li> <li>Not met: Monitoring, tracking and whether better risk prevention/mitigation over time</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Supplier and stakeholders engaged in risk management strategy</li> <li>Not met: Responsible conflict mineral sourcing covers all minerals</li> </ul>

### E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 6.41 out of 80 points scored in themes A-D & F has been applied to produce a score of 1.60 out of 20 points for theme E.

### F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	0.82 out of 4	Out of a total of 44 indicators assessed under sections A-D of the benchmark, Qualcomm made data public that met one or more elements of the methodology in 9 cases, leading to a disclosure score of 0.82 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Company reports on GRI: The Company includes GRI context index in its Sustainability Report 2018, which includes human right issues. [2018 Sustainability Report, 30/09/2018: <a href="http://qualcomm.com">qualcomm.com</a>]</li> <li>Not met: Company reports on SASB</li> <li>Not met: Company reports on UNGPRF</li> </ul>
F.3	Key, High Quality Disclosures	0 out of 4	Qualcomm met 0 of the 8 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples

Indicator Code	Indicator name	Score	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.2 : Board discussions</li> <li>• Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>• Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</li> <li>• Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly</li> <li>• Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>• Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus</li> <li>• Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>• Not met: Score 2 for B.1.2 : Incentives and performance management</li> </ul>

## Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2019 Key Findings report and technical annex for more details of the research process.

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice. The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

No representation or warranty is given that the material in the Benchmark is accurate, complete or up-to-date. The material in the Benchmark is based on information that we consider correct and any statements, opinions, conclusions or recommendations contained therein are honestly and reasonably held or made at the time of publication. Any opinions expressed are our current opinions as of the date of the publication of the Benchmark only and may change without notice. Any views expressed in the Benchmark only represent the views of CHRB Ltd, unless otherwise expressly noted.

While the material contained in the Benchmark has been prepared in good faith, neither CHRB Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers or employees accept any responsibility for or make any representation or warranty (either express or implied) as to the truth, accuracy, reliability or completeness of the information contained in this Benchmark or any other information made available in connection with the Benchmark. Neither CHRB Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers and employees undertake any obligation to provide the users of the Benchmark with additional information or to update the information contained therein or to correct any inaccuracies which may become apparent (save as to the extent set out in CHRB Ltd's appeals procedure). To the maximum extent permitted by law any responsibility or liability for the Benchmark or any related material is expressly disclaimed provided that nothing in this disclaimer shall exclude any liability for, or any remedy in respect of, fraud or fraudulent misrepresentation. Any disputes, claims or proceedings this in connection with or arising in relation to this Benchmark will be governed by and construed in accordance with English law and submitted to the exclusive jurisdiction of the courts of England and Wales.

As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.