

Company Name Qualcomm
Industry ICT (Supply Chain only)
Overall Score 19.5 out of 100

Theme Score	Out of	For Theme
2.8	10	A. Governance and Policies
5.0	25	B. Embedding Respect and Human Rights Due Diligence
4.0	20	C. Remedies and Grievance Mechanisms
3.7	25	D. Performance: Company Human Rights Practices
3.9	20	E. Performance: Responses to Serious Allegations

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 2022 Methodology document for the sector concerned. 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	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: General HRs commitment: The Company's commitment to human rights: 'We are committed to promoting and respecting all internationally recognized human rights and avoiding complicity in any human rights abuse throughout our Company, our operations, and our business relationships, including our subsidiaries, partners, customers, and supply chain'. [Commitment to Human Rights, 9/04/2021: qualcomm.com] Score 2 <ul style="list-style-type: none"> Met: Commitment to the UNGPs: It also states that: 'Our values and approach to these issues adhere to the articles enshrined in the (...) United Nations (UN) Guiding Principles on Business and Human Rights'. [Commitment to Human Rights, 9/04/2021: qualcomm.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Company has a commitment to the ILO Core: It indicates that: 'Our values and approach to these issues adhere to the articles enshrined in the (...) the eight Core Labor Standards of the International Labour Organization (ILO)'. [Commitment to Human Rights, 9/04/2021: qualcomm.com] Met: Company has a explicit commitment to All four ILO Core: The Company indicates that it is committed to: 'Elimination of child labor, forced or compulsory labor and human trafficking, (...) Engagement in discrimination or harassment will not be tolerated'. Regarding workers rights to freedom of association and collective bargaining, it states that: 'Right to exercise freedom of association; collective bargaining agreements and trade unions We respect the rights of employees to form and join trade unions of their own choosing, to bargain collectively and to

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			<p>engage in peaceful assembly in conformance with local law, as well as respect the right of workers to refrain from such activities. In locations where the right to freedom of association is restricted by law, we support the development of alternative means to facilitate the representation of employees' interests. We are compliant with all collective agreements regarding significant operational changes as required by country laws and regulations. We do not tolerate or contribute to threats, intimidation, violence, and physical or legal attacks against human rights defenders, for both our operations and our supply chain. We are committed to supporting human rights defenders' right to freedom of expression, association, and peaceful assembly.' [Commitment to Human Rights, 9/04/2021: qualcomm.com] & [Human Rights Statement: qualcomm.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company expect suppliers to commit to ILO Core: According with its 'Human Rights Commitments': 'Qualcomm has also adopted the RBA Code of Conduct in our own operations and as our Supplier Code of Conduct. We require all suppliers to acknowledge and implement the Code of Conduct in their operations'. The Code indicates that 'the provisions in this Code are derived from and respect internationally recognized standards including the ILO Declaration on Fundamental Principles and Rights at Work'. However, it is not clear it expects suppliers to commit to respecting the human rights that the ILO has declared to be fundamental rights at work, following the description below. [Commitment to Human Rights, 9/04/2021: qualcomm.com] & [RBA v 7.0, 2021: responsiblebusiness.org] • Not Met: Company explicitly list All four ILO for suppliers: According with its 'Human Rights Commitments': 'Qualcomm has also adopted the RBA Code of Conduct in our own operations and as our Supplier Code of Conduct. We require all suppliers to acknowledge and implement the Code of Conduct in their operations'. The RBA Code of Conduct includes provisions on ILO Core areas: 'Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used. [...] Child labor is not to be used in any stage of manufacturing. [...] Participants should be committed to a workforce free of harassment and unlawful discrimination. [...] 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 requires to respect those rights in all contexts, as it indicates 'in conformance with local law'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Commitment to Human Rights, 9/04/2021: qualcomm.com] & [RBA v 7.0, 2021: responsiblebusiness.org]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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"> • Met: Commitment to respect H&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 health and safety management system framework provides clear, consistent and regulatory-compliant policies and protocols for managing health and safety. [Code of Business Conduct, 29/05/2016: qualcomm.com] & [Commitment to Human Rights, 9/04/2021: qualcomm.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: The Company states that it complies with applicable labour laws, including wage and hour laws. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Code of Business Conduct, 29/05/2016: qualcomm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: According with its 'Human Rights Commitments': 'Qualcomm has also adopted the RBA Code of Conduct in our own operations and as our Supplier Code of Conduct. We require all suppliers to acknowledge and implement the Code of Conduct in their operations'. The RBA Code indicates that 'Participants 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. Participants also recognize that ongoing worker input and education are essential to identifying and solving health

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			<p>and safety issues in the workplace. Recognized management systems such as ISO 45001 and ILO Guidelines on Occupational Safety and Health were used as references in preparing the Code and may be useful sources of additional information'. It then lists its health and safety standards, that include: Occupational Safety, Emergency Preparedness, Occupational Injury and Illness, Industrial Hygiene, Physically Demanding Work, Machine Safeguarding, Sanitation, Food, and Housing, Health and Safety Communication. [Commitment to Human Rights, 9/04/2021: qualcomm.com] & [RBA v 7.0, 2021: responsiblebusiness.org]</p> <ul style="list-style-type: none"> • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The RBA Code indicates 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. All overtime must be voluntary. Workers shall be allowed at least one day off every seven days'. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by requiring a maximum of 48 hours regular working week, and consensual overtime paid at a premium rate. [Commitment to Human Rights, 9/04/2021: qualcomm.com] & [RBA v 7.0, 2021: responsiblebusiness.org]
A.1.3.a.ICT	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (ICT)	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"> • Not Met: Responsible mineral sourcing: The Company indicates that it is 'aware of concerns that minerals mined in conflict areas [...] may be fuelling human rights violations and environmental degradation in the DRC region. Qualcomm 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'. However, 'strives to provide' is not considered a formal commitment according to CHRB wording criteria. [Conflict Free Minerals Policy: qualcomm.com] & [Code of Business Conduct, 29/05/2016: qualcomm.com] • Met: Based on OECD Guidance: It indicates that 'Our due diligence measures are designed to conform to the Organisation for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas'. [Commitment to Human Rights, 9/04/2021: qualcomm.com] • Met: Requires suppliers to commit to responsible mineral sourcing: According with its 'Human Rights Commitments': 'Qualcomm has also adopted the RBA Code of Conduct in our own operations and as our Supplier Code of Conduct. We require all suppliers to acknowledge and implement the Code of Conduct in their operations'. The Code indicates that 'Participants shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework'. [Commitment to Human Rights, 9/04/2021: qualcomm.com] & [RBA v 7.0, 2021: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commits to follow OECD Guidance for all minerals • Not Met: Suppliers expected to make similar requirements of their suppliers
A.1.3.b.ICT	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (ICT)	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"> • Met: Migrant worker's rights: According with its 'Human Rights Commitments': 'Qualcomm has also adopted the RBA Code of Conduct in our own operations and as our Supplier Code of Conduct. We require all suppliers to acknowledge and implement the Code of Conduct in their operations'. The Code indicates that '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'. [Commitment to Human Rights, 9/04/2021: qualcomm.com] & [RBA v 7.0, 2021: responsiblebusiness.org] • Met: Expects suppliers to respect at least one of these rights: According with its 'Human Rights Commitments': 'Qualcomm has also adopted the RBA Code of Conduct in our own operations and as our Supplier Code of Conduct. We require all suppliers to acknowledge and implement the Code of Conduct in their operations'. The Code indicates that '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'.

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			[Commitment to Human Rights, 9/04/2021: qualcomm.com] & [RBA v 7.0, 2021: responsiblebusiness.org] Score 2 <ul style="list-style-type: none"> • Not Met: CEDAW/Women's Empowerment Principles • Not Met: Child Rights Convention/Business Principles • Not Met: Convention on migrant workers • Not Met: Expecting suppliers to respect these rights
A.1.4	Commitment to remedy	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: The Company commits to remedy: The Company states 'We are committed to providing remedies for individuals or communities where we have identified that Qualcomm, or third-parties acting on our behalf, have caused or contributed to adverse human rights impacts'. [Commitment to Human Rights, 9/04/2021: qualcomm.com] • Not Met: Company expect suppliers to make this commitment Score 2 <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives • Not Met: Work with suppliers to remedy impact
A.1.5	Commitment to respect the rights of human rights defenders	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Zero tolerance attacks on HRs Defenders (HRDs): The Company indicates that: 'We do not tolerate or contribute to threats, intimidation, violence, and physical or legal attacks against human rights defenders, for both our operations and our supply chain'. [Commitment to Human Rights, 9/04/2021: qualcomm.com] • Not Met: Company expect suppliers to make this commitment: The Company indicates that: 'We do not tolerate or contribute to threats, intimidation, violence, and physical or legal attacks against human rights defenders, for both our operations and our supply chain'. However, it is not clear the Company expects its suppliers to make the same commitment. [Commitment to Human Rights, 9/04/2021: qualcomm.com] Score 2 <ul style="list-style-type: none"> • Not Met: Work with HRD to create safe and enabling environment: It also indicates: 'We are committed to supporting human rights defenders' right to freedom of expression, association, and peaceful assembly'. However, it is not clear it commits to working with human rights defenders to create safe and enabling environments for civic engagement and human rights at local, national or international levels. [Commitment to Human Rights, 9/04/2021: qualcomm.com]

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Board level responsibility for HRs: The Company discloses that its 'The Governance Committee of the Board provides oversight on corporate responsibility matters, including environmental, social, and governance (ESG) issues. Our Corporate Responsibility Leadership Committee reports at least annually on the Company's corporate responsibility and ESG policies, programs, initiatives and reporting to the Governance Committee of the Board. Our Corporate Responsibility Leadership Committee is composed of executives and senior management from across the Company, including human resources, legal, government affairs, supply chain, ethics and compliance, investor relations, operations and finance. It provides guidance on global corporate responsibility issues that are most important to Qualcomm and our key stakeholders so that corporate responsibility remains a central component of our business strategy..' In addition, 'We maintain board-level oversight and engagement with senior executives regarding our corporate responsibility priorities, including our human rights statement, practices, and approach. We report on human rights and other activities to our board of directors regularly.' [Corporate responsibility, N/A: qualcomm.com] & [Human Rights Statement: qualcomm.com] • Not Met: Describe HR expertise of Board member Score 2 <ul style="list-style-type: none"> • Not Met: Speeches/letters by Board members or CEO
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Board/Committee review HRs strategy: The Company provided feedback to this datapoint, but evidence was not material. It is unclear how and when the Human Rights Board Committee reviews human rights issues or problems arising.

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			<ul style="list-style-type: none"> • Not Met: Examples/trends re HR discussion in the last reporting period Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Incentives for at least one board member • Not Met: At least one key HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Board process to review bussiness model and strategy • Not Met: Describe frequency and triggers for reviewing Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

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	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a • Met: Senior responsibility for HR implementation and decision making: The Company states 'We maintain board-level oversight and engagement with senior executives regarding our corporate responsibility priorities, including our human rights statement, practices, and approach. We report on human rights and other activities to our board of directors regularly.' However, no evidence was found on the specific senior manager or senior level committee in charge of Human Rights. The Company indicates that the Human Rights Working Group (day-to-day responsibility) 'reports to senior management and the Board of Directors regularly'. On its governance website the Company indicates that 'Our Leadership Committee provides guidance on global corporate responsibility issues [...] composed of executives and senior management from across the Company [...] this Committee reports annually on our corporate responsibility policies, programs and performance to the Governance Committee of our Board of Directors'. Human rights-related issues are included in corporate responsibility area [Commitment to Human Rights, 9/04/2021: qualcomm.com] & [Corporate responsibility, N/A: qualcomm.com] Score 2 <ul style="list-style-type: none"> • Met: How it assigns Day-to-day responsibility: The Company states 'We maintain a cross-functional team, our Human Rights Working Group, with representation from legal; procurement; corporate responsibility; government affairs; environmental, health and safety; diversity and inclusion; supply chain; ethics and compliance; and privacy and security, that is responsible for implementing, improving and continuously supporting our adherence to our human rights practices. This group also actively engages with external stakeholders on our human rights program and strategies'. [Commitment to Human Rights, 9/04/2021: qualcomm.com] • Not Met: Day-to-day resources and expertise allocation in own ops: Although the company states that 'At Qualcomm, we derive revenues principally from sales of integrated circuit products and licensing our intellectual property. Our integrated circuits and system software are used in wireless devices, such as mobile phones, tablets, laptops, infrastructure equipment, headsets, sound systems and automobiles, and in wired devices, such as broadband gateway equipment, desktop computers, and streaming media players.' There is no evidence of resources allocation. [Commitment to Human Rights, 9/04/2021: qualcomm.com] • Not Met: Resources and expertise allocation in the supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Senior manager incentives for human rights: The Company states that its their Compensation Committee has to 'Review and approve the compensation levels (including salaries, short- and long-term incentive and equity awards) of all Executive Officers, subject to any budgets or other considerations established from

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			<p>time to time by the Board.' However, no evidence was found on compensation related with HRs policy commitments. [Compensation Committee Charter, 15/07/19: d1io3yog0oux5.cloudfront.net]</p> <ul style="list-style-type: none"> • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	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"> • Not Met: HR risks is integrated as part of enterprise risk system: The Company states 'Qualcomm's annual risk assessment of our operations includes the consideration, review and prioritization of various company risks by a cross-functional group of key representatives from legal, finance, human resources and internal audit.' However, no evidence was found of the risk management system addressing HRs. [Commitment to Human Rights, 9/04/2021: qualcomm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Provides an example • Not Met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	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"> • Met: Score of 1 on A.1.2.a • Met: Communicates its policy to all workers in own operations: The company states that 'We provide The Qualcomm Way: Our Code of Business Conduct to all employees worldwide and require that they review, acknowledge, and confirm that they will comply with the policies that are covered.' In addition, the company indicates that 'We require our employees and temporary workers to complete a policy training and certification process every 12-24 months covering our Code of Business Conduct and our Global Foreign Corrupt Practices Act (FCPA) and Anti-Corruption Policy and program.' [Corporate Responsibility Policy, N/A: qualcomm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder: The Company indicates that 'we published the Policy on our external Company website to increase transparency around our global approach to anti-corruption compliance.' However, no further information found how communities are aware of company policy. [Corporate Sustainability Report 2021, 2021: qualcomm.com] • Not Met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to 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"> • Not Met: Meets ILO requirement for suppliers on A.1.2.a • Not Met: Steps to communicate policy commitments to supply chain • Not Met: Requires suppliers to communicate policy requirements <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How HR commitments made binding/contractual • Not Met: Company requires suppliers to cascade down to their suppliers
B.1.5	Training on Human Rights	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2.a • Met: How workers are trained on HR policy commitments: The Company states 'Our security personnel are trained in our policies and procedures concerning aspects of human rights that are relevant to our operations. We require our employees and temporary workers to complete a policy training and certification process every 12-24 months covering our Code of Business Conduct and our Global Foreign Corrupt Practices Act (FCPA) and Anti-Corruption Policy and program.' [Commitment to Human Rights, 9/04/2021: qualcomm.com] & [Corporate Sustainability Report 2021, 2021: qualcomm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Trains relevant managers including procurement: The Company states 'In 2019, we refreshed our inclusion and diversity training and rolled it out to our worldwide talent acquisition staff. This training provided tips and tools, platforms and techniques to help us identify a broader range of world-class candidates, including those that are underrepresented.' However, no evidence was found on human rights training for relevant managers, including procurement. [2019 Sustainability Report, 09/03/2020: qualcomm.com] • Not Met: Score of 2 on A.1.2.a • Not Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet company's HR commitment

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			<ul style="list-style-type: none"> • Met: Disclose % trained: The company states in its Corporate Social Responsibility Report that 'As of September 30, 2021, 99% of Qualcomm employees, temporary workers and interns completed the 2020 Code of Business Conduct Training and Certification requirement, which is assigned to all employees and temporary workers, and to all new employees upon hire.' [Corporate Sustainability Report 2021, 2021: qualcomm.com]
B.1.6	Monitoring and corrective actions	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"> • Met: Scores at least 1 on A.1.2.a • Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company states that 'Because we primarily rely on third parties to perform the manufacturing, assembly and most of the testing of our integrated circuits, we do not generally encounter issues with child labor, forced labor or human trafficking in our direct operations. Indirect salient human rights risks exist primarily in our supply chains and with local community members. Although we may not have direct control over or causal relationships with these risks, we are committed to raising awareness of our expectations and working toward mitigating any potential link or contribution to these risks.' The Company has not provided evidence on how it monitors its human right policies in its own operations. Regarding its supply chain, the Company states that as part of risk-based approach, it requires all semiconductor manufacturing suppliers to complete the RBA Self-Assessment Questionnaire (SAQ) at least annually. These SAQ results have indicated that 100% of semiconductor manufacturing suppliers (representing the top 90% of total product-related spend) have all low-risk manufacturing facilities. In addition to completing the SAQ, suppliers also receive RBA Validated Assessment Program (VAP) audits and/or customer managed audits. However, it is unclear how the company monitor HR policy implementation. [Corporate Sustainability Report 2021, 2021: qualcomm.com] • Met: Proportion of supply chain monitored: The Company reports that SAQ results have indicated that 100% of semiconductor manufacturing suppliers (representing the top 90% of total product-related spend) have all low-risk manufacturing facilities. In addition to completing the SAQ, suppliers also receive RBA Validated Assessment Program (VAP) audits and/or customer managed audits. As of 2021, 78% have received audits. [Corporate Sustainability Report 2021, 2021: qualcomm.com] • Not Met: Describe how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Describes corrective action process • Not Met: Disclose findings and number of corrective action
B.1.7	Engaging and terminating 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"> • Not Met: HR affects selection of suppliers • Not Met: HR affects on-going supplier relationships <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights • Not Met: Working with suppliers to meet HR requirements
B.1.8	Approach to engagement with affected stakeholders	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"> • Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The company indicate that 'Conversations with our key stakeholders are essential to assuring that our corporate responsibility strategy, priorities and efforts align with the current needs of our business and meet the expectations of the people, organizations and communities that have an interest in our Company. Our primary stakeholder groups are our employees, investors, customers, suppliers, governments and communities where we operate, including civil society and non-governmental organizations (NGOs). We are committed to transparency in our engagements with stakeholders to develop trusted and constructive relationships. We consistently seek ways to better communicate and obtain feedback on a variety of topics.' [Corporate Sustainability Report 2021, 2021: qualcomm.com] • Not Met: Discloses stakeholders that HRs may be affected • Not Met: Provides two examples of engagement with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues • Not Met: Describe how views influenced company's HR approach

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	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"> • Not Met: Identifying risks in own operations: The Company indicates that it has a fables production model 'therefore we largely rely son independent third-party suppliers to perform the manufacturing and assembly, and most of the testing of our integrated circuits. Our suppliers are predominantly located in Asia. In the Information and Communications Technology (ICT) sector at large, salient human rights risks include forced labor, child labor, working hours, women's rights, health and safety, freedom of association and collective bargaining, and responsible sourcing of minerals'. It also states that As part of our human right's due diligence efforts, we conduct regular human rights impact assessments, including company-wide and at the market level. We also conduct regular materiality assessments to identify and prioritize relevant corporate responsibility issues, including human rights'. However, no details found in relation to the specific actions carried out in its human rights impact assessments to identify which are the potential issues. In addition, the company indicates 'As part of the implementation of this commitment, we engaged Article One in 2016 to conduct our first formal corporatwide human rights impact assessment (HRIA). Building on this initial assessment, in 2020, we re-engaged Article One to conduct a market-level HRIA of our operations in China to identify and address salient human rights risks across our direct and indirect operations. ' However, no further information found as to whether this is done globally or just on the company's operations in China. [Commitment to Human Rights, 9/04/2021: qualcomm.com] & [Human Rights Website, N/A: qualcomm.com] • Not Met: Identifying risks through relevant business relationships: The Company states 'Our suppliers are predominantly located in Asia. In the Information and Communications Technology (ICT) sector at large, salient human rights risks include forced labor, child labor, working hours, women's rights, health and safety, freedom of association and collective bargaining, and responsible sourcing of minerals.' However, no evidence was found on how the Company identifies these risks within its own suppliers. [Commitment to Human Rights, 9/04/2021: qualcomm.com] & [Human Rights Website, N/A: qualcomm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: The Company states 'As part of our human right's due diligence efforts, we conduct regular human rights impact assessments, including company-wide and at the market level. We also conduct regular materiality assessments to identify and prioritize relevant corporate responsibility issues, including human rights.' However, no evidence was found on the global system (actions taken) used to identify human rights risks. [Human Rights Website, N/A: qualcomm.com] • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
B.2.2	Assessing human rights risks and impacts	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"> • Not Met: Describe process for assessment of HR risks and discloses salient HR issues: The Company indicates that it has a fables production model 'therefore we largely rely son independent third-party suppliers to perform the manufacturing and assembly, and most of the testing of our integrated circuits. Our suppliers are predominantly located in Asia. In the Information and Communications Technology (ICT) sector at large, salient human rights risks include forced labor, child labor, working hours, women's rights, health and safety, freedom of association and collective bargaining, and responsible sourcing of minerals'. It also states that As part of our human right's due diligence efforts, we conduct regular human rights impact assessments, including company-wide and at the market level. We also conduct regular materiality assessments to identify and prioritize relevant corporate responsibility issues, including human rights'. However, no details found in relation to the specific actions carried out in its human rights impact assessments determine which are the salient issues. Evidence refers to the Company doing so, but not how it does it. [Human Rights Website, N/A: qualcomm.com] & [Commitment to Human Rights, 9/04/2021: qualcomm.com] • Not Met: How process applies to supply chain • Met: Public disclosure of the results of HR assessment: The Company states 'As part of our human right's due diligence efforts, we conduct regular human rights impact assessments, including company-wide and at the market level. We also

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>conduct regular materiality assessments to identify and prioritize relevant corporate responsibility issues, including human rights. Through these assessments, we have identified the following salient human rights risks: working conditions in our supply chain, equal opportunity and pay, and product misuse'. [Human Rights Website, N/A: qualcomm.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: How it involved affected stakeholders in the assessment
B.2.3	Integrating and acting on human rights risks and impact assessments	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"> • Not Met: Action Plans to mitigate risks: The Company states ' Our efforts to prevent, mitigate and remediate our human rights risks and impacts include annual assessments of our own operations in accordance with the Responsible Business Alliance (RBA) Self-Assessment Questionnaire (SAQ), engaging with suppliers to ensure conformance with our expectations, annual risk-based onsite audits, and participation in multi-stakeholder initiatives'. However, this indicator looks for evidence of the actual systematic steps taken to mitigate the different salient issues it faces. Current evidence seems to focus in how the company monitors compliance through assessments and audits. [Human Rights Website, N/A: qualcomm.com] • Not Met: Description of how global system applies to supply chain: The Company states ' <p>We require all our top suppliers to complete the RBA SAQ, which includes human rights risks such as working hours, child labor, freedom of association and more, annually. All our top suppliers comply with this requirement and all have low risk manufacturing facilities according to the SAQ. In addition, we ensure the majority of our top suppliers have completed an RBA Validated Assessment Process (VAP) in the last two years'. However, as indicated above, this indicator looks for evidence of steps/actions carried out to mitigate the different issues identified by the Company as salient. Current evidence seems to focus on how the Company monitors compliance with specific requirements. [Human Rights Website, N/A: qualcomm.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Example of actions decided on at least 1 salient HR issues • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking 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"> • Not Met: System for tracking or monitor if actions taken are effective: The Company states that 'we assess manufacturing and manufacturing sites of subsidiaries to evaluate their conformance to our Supplier Code of Conduct via risk assessments and audits, and work with them to address any non-conformance. Our subsidiaries and manufacturing suppliers, in all of their activities, must operate in compliance with all applicable laws, regulations, and rules of the countries in which they operate. We are committed to conducting ongoing human rights due diligence and monitoring'. It also describes the work carried out by its Human Rights Working Group, which 'is responsible for implementing, improving, and continuously supporting our adherence to our human rights practices, as well as, engaging and working with external stakeholders on our human rights program and approach'. However, this indicator looks for evidence of a system description showing how the Company tracks broad actions taken to mitigate salient issues following a risk based approach. Current evidence seems to focus in assessing/auditing suppliers' performance and specific corrective measures. [Human Rights Website, N/A: qualcomm.com] • Not Met: Lessons learnt from checking system effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights 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"> • Not Met: Provides two examples of comms with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% 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	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company states that 'we have a formal, third-party operated grievance and remedy mechanism, our Business Conduct Hotline. The hotline is a comprehensive and confidential reporting tool available for anyone, external or internal, to raise concerns, ask questions or seek guidance anonymously, to the extent permitted by local law'. [Code of Business Conduct, 2021: qualcomm.com] & [Commitment to Human Rights, 9/04/2021: qualcomm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Channel is available in all appropriate languages and workers aware: The company hotline is available 24hrs but no information about language has been found. [Commitment to Human Rights, 9/04/2021: qualcomm.com] • Met: Describe how workers in the supply chain have access to grievance mechanism: The Company states in its Business Conduct Hotline that 'Part of our responsibility is to alert the Company when we know or suspect that one of our employees, agents or suppliers is not acting in a manner consistent with these values. The Business Conduct Hotline is one way that you can raise concerns, ask questions or seek guidance anonymously, to the extent permitted by local law. While we prefer that concerns are not raised anonymously, so that we can most effectively address the concerns raised, it is always better to raise concerns anonymously rather than not raise them at all. Of course, you may also raise concerns or seek guidance in the Company's Code of Business Conduct, from your manager, Human Resources, Legal or any other member of leadership.' [Human Rights Website, N/A: qualcomm.com] • Not Met: Expect Suppliers to convey expectation to their own suppliers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Company states 'we have a formal, third-party operated grievance and remedy mechanism, our Business Conduct Hotline. The hotline is a comprehensive and confidential reporting tool available for anyone, external or internal, to raise concerns, ask questions or seek guidance anonymously, to the extent permitted by local law. All stakeholders can raise concerns via either toll-free hotline or the Internet, and all reports are responded to in one to two business days. 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'. [Commitment to Human Rights, 9/04/2021: qualcomm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness: The Company provided feedback to this datapoint, but evidence was not material. It is unclear how stakeholders can access the system and how they are made aware. • Met: Communities access mechanism direct or through suppliers: The Company indicates 'We are committed to providing remedies for individuals or communities where we have identified that Qualcomm, or third-parties acting on our behalf, have caused or contributed to adverse human rights impacts. As such, we have a formal, third-party operated grievance and remedy mechanism, our Business Conduct Hotline. The hotline is a comprehensive and confidential reporting tool available for anyone, external or internal, to raise concerns, ask questions or seek guidance anonymously, to the extent permitted by local law. All stakeholders can raise concerns via either toll-free hotline or the Internet, and all reports are responded to in one to two business days.' • Not Met: Expect supplier to convey expectation to their own suppliers
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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"> • Not Met: Engages users to create or assess system • Not Met: Examples (at least two) of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are	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"> • Not Met: Response timescales and how complainants will be informed: The company states in its Corporate Sustainability Report that 'Concerns raised via our

Indicator Code	Indicator name	Score (out of 2)	Explanation
	equitable, publicly available and explained		<p>Business Conduct Hotline are reviewed by a cross-functional investigative team comprised of seasoned Internal Audit, Employee Relations, Ethics and Compliance, Information Technology, Global Security and Legal personnel. Case outcomes and remedial action plans for incidents that are substantiated are reviewed and approved by our Corporate Ethics Committee. ' However, no further information about timescale or how complainants will be informed. [Corporate Sustainability Report 2021, 2021: qualcomm.com]</p> <ul style="list-style-type: none"> • Not Met: Describe support (technical, financial,etc) available for equal access by complainants <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Escalation to senior/independent level
C.5	Prohibition of retaliation for raising complaints or concerns	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"> • Met: Public statement prohibiting retaliation: The company states that ' . 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.' [Corporate Sustainability Report 2021, 2021: qualcomm.com] • Met: Practical measures to prevent retaliation: The company indicates 'The hotline is a comprehensive and confidential reporting tool available for anyone, external or internal, to raise concerns, ask questions or seek guidance anonymously.' [Corporate Sustainability Report 2021, 2021: qualcomm.com] & [Commitment to Human Rights, 9/04/2021: qualcomm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders: Company provided feedback to this datapoint, but evidence was not material. However, we found no commitment not to retaliate. • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	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"> • Not Met: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse 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"> • Not Met: Describes how remedy has been provided • Not Met: Says how it would provide remedy for victims if no adverse impact identified <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Changes to systems, processes and practices to stop similar impact • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	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"> • Not Met: Number grievances filed, addressed or resolved and outcome achieved: Although the company presents the number of cases filed, there are no outcomes available. • Not Met: How lessons from mechanism improve management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.b	Living wage (in the 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"> • Not Met: Discloses living wage requirements 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, 2021: responsiblebusiness.org] • Not Met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.4.2	Aligning purchasing decisions with human rights	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"> • Not Met: Avoids business model pressure on HRs (purchasing practices) • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices
D.4.3	Mapping and disclosing the supply chain	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"> • Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The Company has listed its nine primary semiconductor manufacturing suppliers on its website. It also reports that 'The primary foundry suppliers for our various digital, analog/mixed-signal, RF and PM integrated circuits are Global Foundries, Samsung Electronics, Semiconductor Manufacturing International Corporation (SMIC), Taiwan Semiconductor Manufacturing Company (TSMC) and United Microelectronics. The primary semiconductor assembly and test suppliers are Advanced Semiconductor Engineering, Amkor Technology, Siliconware Precision Industries and STATSChipPAC. The majority of our foundry and semiconductor assembly and test suppliers are located in the Asia-Pacific region.' [Supply Chain Management, N/A: qualcomm.com] & [Form 10-K, 26/09/2021: investor.qualcomm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.4.4.b	Prohibition of child labour: Age verification and corrective actions (in the 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"> • Met: Child Labour rules in codes or contracts: The company states that 'Child labor is not to be used in our operations or in any stage of our product manufacture at our manufacturing suppliers and subsidiaries.' [Commitment to Human Rights, 9/04/2021: qualcomm.com] & [Code of Business Conduct, 2021: qualcomm.com] • Not Met: How working with suppliers on child labour <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made
D.4.5.b	Prohibition of forced labour: Recruitment fees and costs (in the 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"> • 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, N/A: qualcomm.com] & [RESPONSIBLE BUSINESS ALLIANCE CODE OF CONDUCT, 2021: responsiblebusiness.org] • Not Met: How working with suppliers on debt & fees: The company indicates that 'Workers shall not be required to pay employers' agents or sub-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.' <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	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"> • Met: Requirement for suppliers to pay workers in full and on time in codes or contracts: The company indicates that 'For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.' [RESPONSIBLE BUSINESS ALLIANCE CODE OF CONDUCT, 2021: responsiblebusiness.org] • Met: How working with supply chain to pay workers regularly and on time: The company applies the RBA Responsible business to its supplier and it 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. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates.' [RESPONSIBLE BUSINESS ALLIANCE CODE OF CONDUCT, 2021: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.4.5.f	Prohibition of forced labour: Restrictions on workers (in the 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"> • 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, N/A: qualcomm.com] & [RESPONSIBLE BUSINESS ALLIANCE CODE OF CONDUCT, 2021: responsiblebusiness.org] • Not Met: How working with suppliers on free movement <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress
D.4.6.b	Freedom of association and collective bargaining (in the 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"> • Not Met: FoA & CB rules in codes or contracts: The RBA Code of Conduct states '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. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.' However, commitment is constrained by 'conformance with local law'. No evidence found of requirement to have alternative or parallel mechanisms when these rights are restricted. [RESPONSIBLE BUSINESS ALLIANCE CODE OF CONDUCT, 2021: responsiblebusiness.org] & [Supply Chain Management, N/A: qualcomm.com] • Not Met: How working with suppliers on FoA and CB: Although the company states that 'We respect the rights of employees to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly in conformance with local law, as well as respect the right of workers to refrain from such activities. We are compliant with all collective agreements regarding significant operational changes as required by country laws and regulations.' No further evidence was found. [Commitment to Human Rights, 9/04/2021: qualcomm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.7.b	Health and safety: Fatalities, lost days, injury, occupational disease 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"> • 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, 2021: responsiblebusiness.org] & [Supply Chain Management, N/A: qualcomm.com] • Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period • Not Met: Fatalities disclosures for lasting reporting period • Not Met: Occupational disease rates for the last reporting period Score 2 <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provide analysis of trends in progress made
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"> • Not Met: Women's rights in codes or contracts • Not Met: How working with suppliers on women's rights Score 2 <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provide analysis of trends in progress made
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"> • 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, 2021: responsiblebusiness.org] • Not Met: How working with suppliers on working hours Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of number affected by excessive working hours • Not Met: Provide analysis of trends in progress made
D.4.10.a	Responsible mineral sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Due diligence in accordance with OECD Guidance 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. The Company also states in the Qualcomm Terms and Conditions of Purchase that 'Seller agrees to comply with Buyer's Supplier Code of Conduct. If Seller is providing Goods, Buyer requires Seller's support for conflict-free sourcing of minerals. Buyer requires Seller source metals to be incorporated into Goods from smelters and refiners that are identified as conflict-free by internationally recognized audit programs (e.g., Responsible Minerals Assurance Process (RMAP)). Seller is required to provide Buyer the conflict minerals sourcing information upon request via the Conflict Minerals Reporting Template. Both the compliant smelter list under the Responsible Minerals Assurance Process (RMAP), and the Reporting Template can be found at responsiblemineralsinitiative.org [RESPONSIBLE BUSINESS ALLIANCE CODE OF CONDUCT, 2021: responsiblebusiness.org] & [Qualcomm Terms and Conditions of Purchase, 01/02/2019: sp.qualcomm.com] <ul style="list-style-type: none"> • Not Met: Works with smelters/refiners and suppliers to build capacity

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Met: Contractual requirement to disclosure smelter/refiner information: The Company indicates ' If Seller is providing Goods, Buyer requires Seller's support for conflict-free sourcing of minerals. Buyer requires Seller source metals to be incorporated into Goods from smelters and refiners that are identified as conflict-free by internationally recognized audit programs (e.g., Responsible Minerals Assurance Process (RMAP)). Seller is required to provide Buyer the conflict minerals sourcing information upon request via the Conflict Minerals Reporting Template. Both the compliant smelter list under the Responsible Minerals Assurance Process (RMAP).' [Qualcomm Terms and Conditions of Purchase, 01/02/2019: sp.qualcomm.com] Not Met: Contractual requirement covers all minerals
D.4.10.b	Responsible mineral sourcing: Risk identification and responses 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"> 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. [Conflict Minerals Report 2019, 08/05/2020: investor.qualcomm.com] Met: Identification of smelter/refiners and OECD Guidance: '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'. [Conflict Minerals Report 2019, 08/05/2020: investor.qualcomm.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Discloses smelters/refiners judged in line with OECD Guidance: The Company provides a table of Conflict Minerals Processing facilities, which are reported by direct suppliers. This table shows which smelters are conformant and which are active. [Conflict Minerals Report 2019, 08/05/2020: investor.qualcomm.com] Not Met: Risk identification and disclosure covers all minerals
D.4.10.c	Reporting on responsible sourcing of minerals	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"> 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'. [Conflict Minerals Report 2019, 08/05/2020: investor.qualcomm.com] Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time Not Met: Disclose better risk prevention/mitigation over time <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Suppliers and stakeholders engaged in risk management strategy Not Met: Risk management and response processes cover all minerals

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 14.27 out of 80 points scored in themes A-D has been applied to produce a score of 3.57 out of 20 points for theme E.

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 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, 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.

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