

# Qualcomm Inc.

**TICKER**  
NAS:QCOM

**MARKET CAPITALIZATION**  
US\$101 billion

**HEADQUARTERS**  
United States

**DISCLOSURES**  
UK Modern Slavery Act: Yes

**TARGETS**  
None

California Transparency in Supply Chains Act: Not applicable

## OVERALL RANKING

**17 out of 49**

([2018 Rank](#): 10 out of 40)

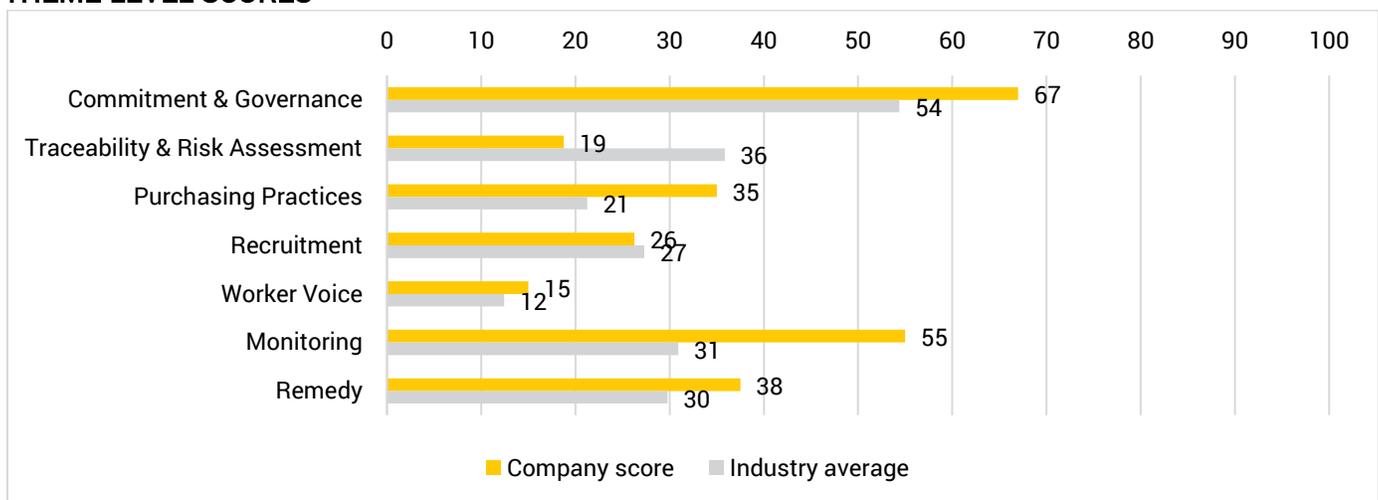
## OVERALL SCORE

**36 out of 100**

## SUMMARY

Qualcomm Inc. (Qualcomm), a supplier to Apple and Microsoft, ranks 17<sup>th</sup> out of 49 companies, disclosing more information on its forced labor policies and practices than its peers on all themes except Traceability & Risk Assessment and Recruitment. Compared to 2018, its rank decreased by seven places, as the company does not seem to have taken steps to strengthen its performance and disclosure. The company's score is based on its good performance on the themes of Commitment & Governance and Monitoring. The company has an opportunity to improve its performance and disclosure on the themes of Traceability & Risk Assessment, Recruitment, and Worker Voice.

## THEME-LEVEL SCORES



Research conducted through October 2019 or through January 2020, where companies provided additional disclosure or links. For more information, see the full dataset [here](#). For information on a company's positive and negative human rights impact, see the Business & Human Rights Resource Centre [website](#).

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**KEY DATA POINTS****SUPPLIER LIST**

No

**AVERAGE SUPPLIER SCORE**

50/100

**HIGH-RISK SOURCING COUNTRIES**China<sup>1</sup>**NO-FEE POLICY**

Yes (Employer Pays Principle)

**REMEDY FOR SUPPLY CHAINS WORKERS**

No

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**LEADING PRACTICES**

None.

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**NOTABLE FINDINGS**

**Commitment & Governance:** Qualcomm discloses that it has adopted version 6.0 of the Responsible Business Alliance (RBA) Code of Conduct (which addresses forced labor) as its supplier code. The company is also a member of the RBA. Qualcomm reports that its supply chain management, corporate regulatory, and other teams are responsible for the implementation of its supply chain policies on forced labor. It discloses that its supply chain and procurement teams undergo targeted human rights training.

**Integration into Supplier Contracts:** The company discloses its purchase order terms and conditions, which require suppliers to comply with the supplier code of conduct. In addition, Qualcomm discloses that 100% of its supplier contracts require conformance with the code.

**Recruitment:** The company's supplier code prohibits worker-paid recruitment fees and includes the Employer Pays Principle, which states that fees must be repaid to workers. The code also prohibits the retention of workers' passports.

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**OPPORTUNITIES FOR IMPROVEMENT**

**Traceability & Risk Assessment:** The company is encouraged to assess and disclose forced labor and human trafficking risks in different tiers of its supply chains. Further, it may consider disclosing the names and addresses of its first-tier suppliers and data points on its suppliers' workforce.

**Recruitment:** To avoid the exploitation of migrant workers in its supply chains, the company is encouraged to ensure that employment and/or recruitment agencies used in its supply chains are monitored. It may also consider providing details of how it supports responsible recruitment in its supply chains (for example, by sharing due diligence findings on recruitment fees with peers or by supporting the development of responsible recruitment schemes).

**Worker Voice:** To support collective worker empowerment, the company is encouraged to work with local or global trade unions to support freedom of association in its supply chains. Where there are regulatory constraints on freedom of association, the company may consider ensuring workplace environments in which workers in its supply chains are able to pursue alternative forms of organizing. Further, while the company provides a publicly available hotline to raise grievances and requires suppliers to have such mechanisms in place, it may consider disclosing data about the practical operation of a mechanism used by suppliers' workers, such as the number of grievances filed, addressed, and resolved, or an evaluation of the effectiveness of the mechanism.

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**ENGAGED WITH KNOWTHECHAIN**

Yes ([Provided Additional Disclosure](#)).

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<sup>1</sup> The US Department of Labor lists China as a country where electronics may be produced using forced labor. US Department of Labor (20 September 2018), "[List of Goods Produced by Child Labor or Forced Labor](#)."