

Qualcomm Inc.

TICKER:
NASDAQ:QCOM

MARKET CAPITALIZATION:
US\$ 108 billion

HEADQUARTERS:
United States

11 OUT OF 20
Company’s Overall Ranking

42 OUT OF 100
Company’s Overall Score

Qualcomm Inc. (Qualcomm) demonstrates average disclosure of its efforts to mitigate the risk of human trafficking and forced labor its supply chain. The company places eleventh on the benchmark overall. Among its strengths, Qualcomm demonstrates robust practices and disclosure in areas such its traceability activities and purchasing practices. To improve its ranking, Qualcomm is encouraged to adopt and publicly disclose its approach to the recruitment of workers in its supply chain. Furthermore, it has an opportunity to improve in the area of worker voice, supplier monitoring, and remedy programs.

THEME LEVEL SCORE

Commitment and Governance	70 out of 100
Traceability and Risk Assessment	75 out of 100
Purchasing Practices	81 out of 100
Recruitment	17 out of 100
Worker Voice	26 out of 100
Monitoring	13 out of 100
Remedy	13 out of 100

LEADING PRACTICES

None.

NOTABLE FINDINGS

Commitment and Governance: Qualcomm has adopted the most recent version of the Electronic Industry Citizenship Coalition (EICC) Code of Conduct (version 5.1) as its supplier code of conduct, which prohibits forced labor. The company’s Supply Chain Management, Corporate Source2Pay, Corporate Regulatory, and Quality Engineering teams are tasked with day-to-day supply chain management, including addressing human trafficking and forced labor risks.

Traceability and Risk Assessment: As a result of suppliers’ self-assessment, Qualcomm concluded that “all of its semiconductor suppliers that account for the top 90% of total product-related spend are identified as being low risk” for forced labor and human trafficking. The company discloses a list of its primary semiconductor suppliers and states that the majority of them are located in the Asia-Pacific region. It also discloses some information on suppliers beyond its first-tier, particularly as it relates to conflict minerals suppliers, publishing the names, country of location, and mineral of



smelters and refiners in its supply chain.

Purchasing Practices: Prior to signing an agreement with a supplier, the company assesses the compliance of a potential supplier against the EICC Code, which includes forced labor. Qualcomm also outlines a requirement for its suppliers to adopt the EICC Code in its contractual agreements. Furthermore, the company states that it does not allow subcontracting without its approval. In alignment with its 2030 Sustainability Vision which includes a commitment to "Maintain adherence to [its] Supplier Code of Conduct in [its] extended supply chain" and EICC Code requirements, Qualcomm asks its direct suppliers to ensure their suppliers are in compliance with the EICC Code.

OPPORTUNITIES FOR IMPROVEMENT

Recruitment: The company has an opportunity to enhance its approach to and disclosure on recruitment practices in its supply chain. In particular, it may consider requesting its suppliers to disclose the recruiters that they use and conducting audits of these recruiters.

Worker Voice: Qualcomm may consider engaging with workers in their supply chain outside of the facilities in which they work, especially on their fundamental rights at work. The company could further improve its performance in this area by requiring its suppliers to ensure workplace environments where workers may pursue alternative forms of organizing, especially in countries where freedom of association is restricted by law.

Monitoring and Remedy: To further enhance its performance, the company may consider disclosing supply chain monitoring activities, including unannounced visits and interviews with workers. The company may request that suppliers found to be violating the company's standards on human trafficking and forced labor are required to implement a corrective action plan.

COMPANY PROVIDED ADDITIONAL DISCLOSURE:

[Yes.](#)

