CHEOL WOONG LEE
[redacted]

CHEOL WOONG LEE, IN PRO PER

LABOR AND WORKFORCE DEVELOPMENT AGENCY (LWDA)

STATE OF CALIFORNIA

CHEOL WOONG LEE, Aggrieved Employee / Private Attorney General, vs. QUALCOMM INCORPORATED & QUALCOMM ATHEROS, INC., Defendant.	CASE NO. LWDA-CM-1153847-26 AMENDED NOTICE OF LABOR CODE VIOLATIONS PURSUANT TO PAGA (LABOR CODE § 2699.3)

DATE: October 5, 2026

TO: Labor and Workforce Development Agency (LWDA) Attn: PAGA Administrator (Filed via Online Portal)

AND TO DEFENDANTS:

Qualcomm Incorporated c/o CSC - LAWYERS INCORPORATING SERVICE (Agent for Service of Process) 2710 Gateway Oaks Drive, Suite 150N Sacramento, CA 95833

Qualcomm Atheros, Inc. c/o CSC - LAWYERS INCORPORATING SERVICE (Agent for Service of Process) 2710 Gateway Oaks Drive, Suite 150N Sacramento, CA 95833

Ann Chaplin (EVP, General Counsel) Qualcomm Incorporated 5775 Morehouse Drive San Diego, CA 92121

FROM: Cheol Woong Lee (In Pro Per / Private Attorney General)

[redacted]

RE: AMENDED NOTICE OF LABOR CODE VIOLATIONS PURSUANT TO PAGA (LABOR CODE § 2699.3)

PAGA Case No.: LWDA-CM-1153847-26

Aggrieved Employee: Cheol Woong Lee

Dear LWDA Administrator and Defendants:

Pursuant to the California Private Attorneys General Act (PAGA), Labor Code § 2699.3, I am filing this Amended Notice to update the existing PAGA Case (LWDA-CM-1153847-26) filed on January 30, 2026.

This amendment serves two primary purposes:

1. **Adding Additional Corporate Defendant:** Explicitly adding Qualcomm Atheros, Inc. as a Joint Employer alongside the existing defendant, Qualcomm Incorporated (collectively "Qualcomm").
2. **Adding Additional Claims:** Notifying the LWDA of a "New Harm" consisting of intentional perjury, obstruction of justice, and structural retaliation under California Labor Code § 1102.5.

I. The New Harm: Perjury to a Government Agency (Oct 8, 2025)

This claim is not about the 2024 termination itself, but rather the subsequent, independent administrative crime committed by Qualcomm. **On October 8, 2025, Qualcomm submitted a formal response to the California Civil Rights Department (CRD), falsely stating that I never requested any reasonable accommodation for my disabilities prior to my termination (Exhibit A).** This deliberate misrepresentation to a state agency constitutes severe obstruction and a violation of Labor Code § 1102.5.

The attached documentary evidence irrefutably dismantles Qualcomm's perjury:

- **Exhibit B (Email dated May 20, 2024):** Two days before my termination notice, I explicitly sent a written "Fact Check List" email to Qualcomm HR ([redacted] and management. Section 5 of this email was boldly titled "Disability Accommodation Request," proving HR had direct, prior written knowledge of my requests.
- **Exhibit C (Contemporaneous Record of May 22, 2024 Interactive Process):** During the 60-minute HR video call, I explicitly reiterated the disability accommodation request I had previously submitted in writing just two days prior (May 20, 2024). I proposed a feasible accommodation: migrating to an Intellectual Property (IP) or Patent role where my intact patent-writing skills could be utilized in an independent work environment. HR ([redacted] ignored this accommodation request and immediately issued a retaliatory notice of termination.

II. Joint Employer Liability & Structural Retaliation (Labor Code § 1102.5)

Qualcomm operates a unified, structural chain of command that fundamentally invalidates any attempt to separate liability between Qualcomm Incorporated (Parent) and Qualcomm Atheros, Inc. (Subsidiary). The Parent company cannot use the Subsidiary as a shield to evade liability, as evidenced by the structural fusion of their compliance and HR operations:

- **Exhibit D (Qualcomm Code of Ethics):** The official Code of Ethics is mandated by the Parent company (Qualcomm Incorporated) and applies universally to all subsidiaries (Section 1). Section 5 explicitly guarantees protection against retaliation for employees utilizing the Parent's centralized whistleblowing system (EthicsPoint).
- **Exhibit E (Email dated Feb 7, 2024):** This document proves that the Parent's centralized EthicsPoint system is structurally compromised. [redacted] (Subsidiary HR) was directly assigned by the Parent's EthicsPoint system as the internal investigator for my whistleblowing complaint (Ticket #HRC0673096). He intentionally removed the case from the official tracking system and closed it silently.
- **The Structural Retaliation Trap (Exhibit C & E Link):** Subsequently, the exact same individual—[redacted] who was designated by the Parent to protect and investigate the

whistleblower—acted as the Subsidiary HR executioner who gatekept my communications and issued my retaliatory termination notice on May 22, 2024 (Exhibit C).

Assigning the power to investigate a whistleblower to the very same HR representative who executes their retaliatory termination is a textbook violation of Labor Code § 1102.5. This structural fusion irrefutably proves that the "Qualcomm EthicsPoint" is not a genuine compliance mechanism, but rather a deceptive tool designed by the Parent to identify and retaliate against internal whistleblowers. Consequently, Qualcomm Incorporated and Qualcomm Atheros, Inc. share complete Joint Employer Liability for this unlawful termination.

Conclusion Qualcomm's actions on October 8, 2025, represent a calculated effort to deceive a California state agency to conceal their structural retaliation. The provided exhibits represent concrete, unassailable evidence of these violations.

I reserve the right to amend this notice further if additional violations are discovered. I look forward to the LWDA's review of these severe administrative offenses.

Sincerely,

(Sign here) Cheol Woong Lee

Cheol Woong Lee

Aggrieved Employee / Private Attorney General

Executed on October 5, 2026, at Hayward, California.

Cheol Woong Lee Applicant, In Pro Per

[EXHIBITS LIST]

I. EVIDENCE OF PRIOR KNOWLEDGE AND PERJURY (New Harm)

- **Exhibit A:** CRD Closure Determination Letter (Dated Oct 8, 2025) – Official government record proving Qualcomm's false statements to the state agency regarding the absence of accommodation requests.
- **Exhibit B:** "Fact Check List" Email to HR Documenting Written Accommodation Request (Dated May 20, 2024)
- **Exhibit C:** Contemporaneous Record of HR Interactive Process and Retaliation (Dated May 22, 2024)

II. EVIDENCE OF STRUCTURAL RETALIATION AND JOINT EMPLOYER LIABILITY

- **Exhibit D:** Qualcomm Incorporated Code of Ethics (Highlighting Sections 1 & 5)
- **Exhibit E:** Email from [redacted] Confirming Dual Role in EthicsPoint Investigation and HR (Dated Feb 7, 2024)

Executed on October 5, 2026, at Hayward, California.

Cheol Woong Lee Applicant, In Pro Per

Cheol Woong Lee

Your signature
CHEOL WOONG LEE
IN PRO PER

[PROOF OF SERVICE BY MAIL]

Case No. LWDA-CM-1153847-26 **Case Name:** Cheol Woong Lee vs. Qualcomm Inc.

I am a resident of the County of Alameda, California. I am over the age of eighteen years and I am the Applicant, appearing In Pro Per. My mailing address is: [redacted]

On **October 5, 2026**, I served the attached document described as: **AMENDED NOTICE OF LABOR CODE VIOLATIONS PURSUANT TO PAGA (LABOR CODE § 2699.3)** on the interested parties in this action by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully paid, in the United States mail at **San Jose, California**, addressed as follows:

Qualcomm Incorporated c/o CSC - LAWYERS INCORPORATING SERVICE (Agent for Service of Process) 2710 Gateway Oaks Drive, Suite 150N Sacramento, CA 95833

Qualcomm Atheros, Inc. c/o CSC - LAWYERS INCORPORATING SERVICE (Agent for Service of Process) 2710 Gateway Oaks Drive, Suite 150N Sacramento, CA 95833

Ann Chaplin (EVP, General Counsel) Qualcomm Incorporated

5775 Morehouse Drive San Diego, CA 92121

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **October 5, 2026**, at San Jose, California.

Cheol Woong Lee **Signature** Cheol Woong Lee

STATE OF CALIFORNIA | Business, Consumer Services and Housing Agency
GAVIN NEWSOM, GOVERNOR

Civil Rights Department
KEVIN KISH, DIRECTOR
651 Bannon Street, Suite 200 | Sacramento | CA | 95811
1-800-884-1684 (voice) | 1-800-700-2320 (TTY) | California's Relay Service at 711
calcivilrights.ca.gov | contact.center@calcivilrights.ca.gov

October 8, 2025

Via Email: [redacted]

Cheol Woong Lee
3964 Rivermark Plaza PMB 107
Santa Clara, CA 95054

RE: **Closure Determination and Request for Additional Information**
Case Number: 202407-25600929
EEOC Number: 37A-2025-00312
Case Name: Lee / Qualcomm
Case Type: Employment

Dear Cheol Woong Lee:

Your allegations of discrimination against the above referenced Respondent and/or Co-Respondent(s) have been filed with our Department and with the U.S. Equal Employment Opportunity Commission (EEOC), if applicable.

Based on an analysis of the facts and circumstances which you alleged, your complaint will be closed for the following reason: **Insufficient Evidence**. If you disagree with this determination, you must provide more information to substantiate your allegations **within ten (10) calendar days** from the date of this letter. Please provide any new detailed information or evidence (i.e., documents, records, witness information) that supports your complaint. Specifically, respond to the statements or questions below.

Allegations Summary:
In your complaint filed in November 1, 2024, you alleged that you were subjected to disability discrimination and denied reasonable accommodation. You asserted that your employer failed to acknowledge a newly disclosed disability and corresponding accommodation request, ultimately resulting in your termination.

Respondent Summary:
The Respondent denies all allegations of disability discrimination and asserts that no disability was disclosed as claimed. Documentation indicates that in June 2020, you voluntarily agreed to assist with a time-sensitive project, during which management encouraged you to rest on weekends. In fall 2020, the Respondent approved a combination of remote work and paid time off for you to travel to South Korea. In mid-December 2020, when asked to return to the United States, you declined, citing health concerns for the first time. Upon contacting Human Resources, you were provided with information regarding medical leave, which was approved from January 4, 2021, through September 30, 2021.

Upon your return in November 2021, the Respondent states that you began sending inappropriate emails to colleagues and executives at various hours. Concerned by this behavior, the Respondent engaged its Employee Relations team to offer support.

In February 2022, you commenced another medical leave, from which you did not return. Under the Respondent's "12-24" policy, employment is not automatically terminated at the 12-month mark; however, your leave extended beyond two years. On May 22, 2024, you informed the Respondent that you were unable to return to work in the foreseeable future. Consequently, the Respondent issued a written notice of termination on August 8, 2024, effective August 22, 2024.

The Respondent maintains that when an employee's absence becomes indefinite and cannot be reasonably accommodated, severance is not required. However, due to concurrent workforce reductions, Human Resources offered you a severance package, which you accepted. The signed agreement included a release of all claims. The Respondent states that at no point did you disclose a new disability or request accommodation related to rehabilitation or return-to-work efforts.

Investigative Findings:
As part of the California Civil Rights Department (CRD) investigation, the department first assessed whether the alleged harm occurred. Based on the evidence reviewed including the employee handbook, leave and accommodation policies, and correspondence between the parties. CRD found insufficient evidence to support a violation of the Fair Employment and Housing Act (FEHA).

On or about September 10, 2025, CRD notified you via email that your signed severance agreement, dated September 22, 2024, included a release of all claims. According to your intake inquiry submitted in July 2024, prior to signing the agreement, CRD determined it could not proceed with the investigation.

On October 6, 2025, CRD sent a request to withdraw the complaint via Adobe Esign, but the signed forms were not returned, as confirmed by Adobe's audit report.

In response to your September 10, 2025, email requesting additional documentation from the Respondent including Ethics Point logs, investigator notes, and internal emails. CRD reiterated its role as a neutral fact-finding entity. Accordingly, only documents directly relevant to the allegations in your sworn complaint filed on November 1, 2024, were requested and reviewed.

Conclusion:
Based on the totality of the evidence presented by both parties, CRD finds insufficient evidence to support a claim of disability discrimination or denial of reasonable accommodation. The new information that you provide will be carefully considered. If you do not provide more information which substantiates your allegations **within ten (10) calendar days**, October 18, 2025, your complaint will be closed and you will be issued a "Right to Sue" notice, which allows you to file a private lawsuit.

You can provide the information by telephone, mail or e-mail. If you choose to mail your response, please include your case number **202407-25600929** and mail it to the **Civil Rights Department, 651 Bannon Street, Suite 200, Sacramento, CA 95811.**

Thank you for your cooperation.

Sincerely,

Sylvia Knight

Sylvia Knight
Consultant III, Specialist
916-964-1953
sylvia.knight@calcivilrights.ca.gov

Qualcomm EthicsPoint: Fact Check List

보낸사람 CHEOL WOONG LEE [redacted]

받는사람 [redacted]

May 20, 2024 (Mon) 11:07 PM

첨부 1개 406KB 모두저장 | 이미지로 보기 ! 파일 저장 시 바이러스 검사 자동 수행

CRD Letter 2023_1215 and Email 2018_0912.pdf 406.2KB

Dear [redacted] (Cc to [redacted]

[Fact Check 1] Spruce TPC dLLDR

In the RFA division, the typical sequence of tasks is HLDR, MLDR, LLDR, and then dLLDR.
On June 1, 2020, [redacted] requested through [redacted] for me to work on the Spruce TPC dLLDR.
[redacted] requested me from June 1, 2020, to June 12, 2020, to fix a circuit bug found in Moselle TPC at Spruce TPC, which required the dLLDR task.
This implies that the Spruce TPC LLDR should have been already completed before June 1, 2020.
Please confirm with [redacted] whether the task assigned to me on June 1, 2020, was Spruce TPC dLLDR or Spruce TPC LLDR.

[Fact Check 2] Spruce TPC MLDR/LLDR

Originally, Spruce TPC MLDR/LLDR was assigned to [redacted] for the period from February 2020 to May 2020.
At [redacted] request, I mentored [redacted] twice regarding Spruce TPC in Feb 2020.
However, [redacted] abandoned the task midway, leading to Spruce TPC MLDR/LLDR not being completed by May 31, 2020.
[redacted] was well aware of the design challenges associated with Spruce TPC.
Please confirm this information with [redacted]

[Fact Check 3] Spruce TPC LLDR

[redacted] first became aware that the Spruce TPC LLDR had not been completed yet on June 18, 2020.
At 11AM in the morning of June 18, 2020, [redacted] invited [redacted] and me to a meeting to discuss this matter.
During this meeting, I reported that although I had already completed the Spruce TPC dLLDR requested by [redacted] the Spruce TPC LLDR had been neglected up to that point.
With the tapeout scheduled for June 19, 2020, I explained that completing the Spruce TPC LLDR in such a short timeframe was impossible and requested adequate time to accomplish the task.

[redacted] expressed serious concern over the lack of progress on the Spruce TPC LLDR and emphasized that it should be completed before the tapeout.
Despite my request for the adequate time, [redacted] requested that I finish the Spruce TPC LLDR within a week, delaying the tapeout by one week.
This request implied working 40 hours per week, totaling 40 hours to complete the Spruce TPC LLDR, which was an unreasonable demand and clearly required extreme overwork.
Please confirm these details with [redacted]

[Fact Check 4] Workload Calculation

[redacted] stated two things during the deposition dated Nov 14, 2023:
[Statement 1] *I never assigned Cheol Woong Lee more than 40 hours of work per week.*
[Statement 2] *If I were in the same situation, the work could have been completed in two weeks with 40-hour weeks.*

Please contact [redacted] to estimate how many weeks of work would be needed to complete both the Spruce TPC dLLDR and Spruce TPC LLDR tasks, working 40 hours per week.

Exhibit B

Maple TPC operates at 2.45 GHz, but Spruce TPC needs to operate at 7.25 GHz.
If [redacted] made [Statement 2] regarding Maple TPC, I would agree with him.
I am the person who actually designed Maple TPC, and I could complete everything within two weeks working 40 hours per week.
However, since Spruce TPC needs to operate at 7.25 GHz, [redacted] [Statement 2] does not make sense.
If [redacted] claims [Statement 2] about Spruce TPC, it may indicate a serious problem with his circuit design insight as senior director.

[Fact Check 5] Disability Accomodation Request
Before joining Qualcomm, I had a [redacted]
In September 2018, I experienced signs of a relapse that required hospitalization.
At the time, my mother had [redacted].
If I were to be hospitalized, there would be no one to care for her.
My sister, who lived in LA, came to my home, and we decided that she would take care of our mother while I was admitted to a hospital in LA.

On September 12, 2018, at 11:10 PM, I first informed [redacted] about my mental disability via email in Korean.
I did not tell anyone else about my mental disability because I trusted only [redacted] the most.
Subsequently, I was hospitalized for treatment from September 15 to September 18, 2018 for 4 days.

I had a meeting with [redacted] to discuss my invention, Quantum Division Multiple Access (QDMA), scheduled on November 14, 2018.
My invention, Quantum Division Multiple Access (QDMA), was my dedicated effort to contribute to Qualcomm's 7G Wireless Standard.
Because I believe that it was necessary to inform [redacted] I visited his office one evening in October 2018 at 6 PM for a 30-minute conversation.

During this meeting, I candidly shared everything about my mental disability that I had since before joining Qualcomm.
I explained that due to my mental disability, I had been forced to leave UC Berkeley with just an MS degree in 2007 and joined Qualcomm in 2008.
Later, I appealed to the UC Berkeley Graduate Division for mental disability discrimination and earned my PhD in 2011.

I clearly orally requested a disability accommodation from [redacted] stating that due to my mental disability, I should not be overworked beyond 40 hours per week.
[redacted] assured me that no Qualcomm employee is required to work more than 40 hours a week and that even Qtime will not allow more than 40 hours to be recorded.
After our 30-minute discussion, we continued our conversation on the elevator down to the parking lot.
[redacted] encouraged me, saying that if my Quantum Division Multiple Access (QDMA) were realized, it would be a groundbreaking technology like quantum jump.

Despite this clear interaction, CRD Officer, [redacted] after interviewing [redacted] stated in a letter dated December 15, 2023, that Qualcomm alleges that I never requested [redacted] not to assign me to work more than 40 hours per week.
I guess that [redacted] might forget our meeting in the evening in October 2018.
Please verify this matter again with [redacted]

[Fact Check 6] Qualcomm EthicsPoint vs Qualcomm NegligencePoint
Since joining Qualcomm in February 2008, I have strived to adhere to Qualcomm Ethics Code.
However, it appears that the reality of Qualcomm EthicsPoint is more akin to Qualcomm NegligencePoint.
Is Qualcomm EthicsPoint truly upholding the Qualcomm Ethics Code?
The fundamental starting point of Qualcomm EthicsPoint should be fact-checking.

I am giving you until May 31, 2024, to address this matter.

If fact-checking is not conducted and this issue is neglected, demonstrating Qualcomm NegligencePoint, I will seek punitive damages for Qualcomm's malpractice.
There is a famous scandal in American history called Watergate.
It started with a very small negligence, but attempts to cover it up through false statements and evidence destruction led to much greater repercussions than the initial misconduct.
If Qualcomm cannot uphold its own Qualcomm Ethics Code, it means that telling employees to adhere to Qualcomm Ethics Code was ultimately deceptive.

I understand that [redacted] might have been very troubled on June 18, 2020, upon realizing that [redacted] had not properly reported the status of Spruce TPC, especially with the tapeout scheduled for June 19, 2020.
However, my work was entirely unrelated to Spruce TPC; I was working on Slate TPC.
Why should I be held responsible for resolving the crisis caused by [redacted] mismanagement through severe overwork?

How could it have been possible to complete the Spruce TPC LLDR in one week, working 40 hours per week, as of June 18, 2020?
Despite my clear Disability Accommodation Request made orally in person to [redacted] in October 2018, the demand by the same person, [redacted] for me to complete the Spruce TPC LLDR within one week, requiring extreme overwork, clearly constitutes Disability Discrimination and Harassment.
Please verify these facts with [redacted]

[Attachments]
1. Closure Determination Letter by [redacted], CRD Officer dated Dec 15, 2023
2. Email to [redacted] dated September 12, 2018 at 11:10PM (Korean)
3. Email to [redacted] dated September 12, 2018 at 11:10PM (Translated into English)

Sincerely,
Cheol Woong Lee

Contemporaneous Record of Interactive Process with Qualcomm HR

Note: This document is a typed summary based directly on my contemporaneous handwritten notes taken during and immediately after the call on May 22, 2024.

1. Meeting Overview

- **Date & Duration:** May 22, 2024 1:30pm to 2:30pm for 60 minutes
- **Attendees:** Cheol Woong Lee (Employee), [redacted] (Qualcomm HR)
- **Purpose:** To update disability status, propose reasonable accommodations, and discuss employment status.

2. Core Summary (Based on Timestamps)

- **HR's Refusal to Discuss Written Request & Blocking of EthicsPoint Channel:** I initiated the meeting by requesting text chat support due to my [redacted] I explicitly asked if HR ([redacted] had reviewed the "Fact Check List" email (which included a Disability Accommodation Request) sent to HR and management two days prior on May 20, 2024. HR acknowledged receiving the email but explicitly refused to address any questions regarding the litigation or EthicsPoint. Furthermore, HR unilaterally declared the EthicsPoint investigation "closed" and restricted the conversation strictly to my leave of absence and employment status.
- **Health Status Update & Strong Intent to Return to Work:** I reported that three out of my five disabling conditions ([redacted]) had significantly improved. I explained that I was currently undergoing cognitive and memory rehabilitation at Stanford University Hospital and had recently been approved for Social Security Administration (SSA) disability benefits (approx. $3,000/month). I repeatedly and strongly affirmed my clear intention to return to work at Qualcomm once recovered, stating I had absolutely no desire to terminate my employment.
- **Proposal of Specific Reasonable Accommodation:** I proposed a highly specific, feasible, and reasonable accommodation for my return to work. While acknowledging that my cognitive disabilities made my previous role (which required real-time communication with multiple colleagues) temporarily difficult, I

emphasized that my patent-writing and Intellectual Property (IP) skills remained fully intact. Therefore, I officially requested a transfer to an IP/Patent department or assignment to an independent, one-person project that would minimize real-time, multi-party communication.

- **HR's Dismissal of Accommodation, Retaliatory Termination Notice, and Communication Gatekeeping:** HR ([redacted] entirely ignored my proposal for an inter-departmental transfer and failed to engage in any interactive process regarding this reasonable accommodation. Instead, citing the company's leave policy (12 months within a 24-month period), HR immediately provided an advance notice of termination, claiming the company could no longer accommodate the leave. Additionally, HR imposed strict "communication gatekeeping," explicitly instructing me not to contact my direct supervisors ([redacted] Ko, etc.) or teammates, and mandated that I direct all future communications solely to HR ([redacted] and [redacted]

3. Employee's Official Objection to Wrongful Termination I firmly objected, clarifying that my [redacted] was not a personal illness but a direct result of an extreme overwork assignment forced upon me by Qualcomm management ([redacted] I explicitly warned HR that proceeding with termination—especially when I had submitted a written accommodation request on May 20, actively reiterated my intent to return to work, and proposed a viable alternative role (IP/Patent)—would clearly constitute wrongful termination and disability discrimination.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Cheol Woong Lee

Executed on October 5, 2026, at Hayward, California.

Cheol Woong Lee

Aggrieved Employee / Private Attorney General

QUALCOMM INCORPORATED
CODE OF ETHICS

1. Application and Purpose

This Code of Ethics (this "Code") shall apply to all QUALCOMM Incorporated ("QUALCOMM" or the "Company") employees, including the Company's Executive Officers (as defined under Nasdaq listing standards), and employees of QUALCOMM subsidiaries (collectively, "Employees"), as well as each member of the Company's Board of Directors ("Directors"). Every Employee and Director must be familiar with and understand the provisions of this Code. The purpose of this Code is to promote:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Full, fair, accurate, timely and understandable disclosure in reports and documents that QUALCOMM files with, or submits to, the United States Securities and Exchange Commission ("SEC") and in other public communications;
- Compliance with applicable governmental laws, rules and regulations;
- The prompt internal reporting of violations of this Code; and
- Accountability for adherence to this Code.

The Code establishes a framework for ethical conduct, setting out general principles of behavior and is not meant to cover every situation that may arise. The Company has enacted a Code of Business Conduct and other policies that set out requirements for compliant and lawful behavior.

2. Honest and Ethical Conduct

All Employees and Directors shall perform their duties in an honest and ethical manner. This includes:

- Avoiding situations in which their personal, family or financial interests conflict with those of the Company;
- Refraining from engaging in any activities that compete with the Company, or which may compromise its interests;
- Refraining from taking any business or investment opportunity discovered in the course of employment with or service to the Company that the Employee or Director knows, or should have or has reason to know, would benefit the Company;
- Seeking to avoid misrepresentations of material facts or engaging in unfair dealing with customers, suppliers, business partners, and other third parties;

- Maintaining appropriate confidentiality over material non-public Company and third-party information; and

- Complying with all applicable governmental laws, rules, and regulations.

QUALCOMM encourages Employees and Directors to avoid even the appearance of a conflict of interest and to raise ethical questions, dilemmas, concerns, or suggestions with appropriate individuals within the Company, including supervisors, managers, senior management, or human resources. QUALCOMM has since its inception encouraged escalation of such issues and based upon prior experience, many, if not most, of these issues can be addressed informally, after appropriate discussion and analysis. Any Employee or Director who becomes involved in a situation that gives rise to an actual conflict of interest must promptly inform the Chief Risk and Compliance Officer of such conflict.

3. Full, Fair, Accurate, Timely and Understandable Disclosure

QUALCOMM is committed to ensuring that all disclosures in reports and documents that the Company files with or submits to the SEC, as well as other public communications made by the Company, are full, fair, accurate, timely and understandable. The Company's Chief Executive Officer, President, Chief Financial Officer, and Chief Accounting Officer (with respect to financial disclosures) are ultimately responsible for taking all necessary steps to ensure that this occurs. All Company Employees and Directors shall take appropriate steps within their area of responsibility to ensure the same.

4. Compliance with Laws, Rules and Regulations

The Company expects its Employees and Directors to comply with all applicable laws, rules, and regulations irrespective of location. Violation of the law in conducting Company business are a violation of this Code and other Company policies. This includes, but is not limited to, violations relating to trading in, or making unapproved disclosures of, material non-public information learned in the course of conducting Qualcomm business.

5. Internal Reporting of Code Violations

Any Employee or Director who in good faith believes or suspects a violation of any portion of this Code took place or was not resolved appropriately and does not feel comfortable addressing the issue with their manager should immediately report such violation to the Chief Risk and Compliance Officer or to the Chair of the Audit Committee. The Company will promptly evaluate and/or investigate such reports. Although the Company strongly prefers that any individual who wishes to make such a complaint identify him/herself (to assist in the understanding of the concerns expressed), the Company has created a Business Conduct Hotline ("hotline") where Employees or Directors may confidentially and anonymously (where local country law permits) report known or suspected violations of this Code. To access the hotline, any Employee or Director may call 800-300-3816 in the U.S., or visit **http://qualcomm.ethicspoint.com** or **go/hotline** to do a country search to find a local phone number or submit a concern online. Any person reporting such a violation should be prepared to provide as much detail as possible about the suspected violation, including the individuals involved, the nature of the violation, documentation of the violation, or any other information which may be helpful in the Company's evaluation and/or investigation of the complaint. Prompt disclosure to the appropriate parties is

vital to ensure a thorough and timely evaluation and appropriate resolution. A violation of this Code is a serious matter and could have legal implications. Allegations of such behavior should not be made to embarrass or place anyone in false light or otherwise be made in bad faith. The Company does not tolerate retaliation against anyone who provides information in good faith to the Company or law enforcement concerning a possible violation of any law, rule, regulation, or this Code. Retaliation can lead to disciplinary action, up to and including termination of employment, as well as civil and/or criminal penalties.

6. Consequences for Non-Compliance with this Code

Corrective Actions. Any violation of applicable laws, rules and regulations, or any deviation from the standards embodied in this Code will result in appropriate corrective and/or disciplinary action, up to and including termination of employment. Nothing in this Code requires actions contrary to the law.

Required Government Reporting. Whenever conduct occurs that requires a report to the government, the Chief Risk and Compliance Officer or other applicable Company personnel, under the direction of the Audit Committee, shall be responsible for complying with such reporting requirements.

7. Publication of this Code; Amendments and Waivers

- This Code will be posted and maintained on the Company's website and posting will be disclosed in the Company's Annual Report on Form 10-K, by reference to the Company's proxy statement, if permitted by SEC rules.

- The Annual Report on Form 10-K, by reference to the Company's proxy statement, if permitted by SEC rules, will also contain a statement that amendments to and waivers of this Code that are required to be disclosed by SEC rules or Nasdaq listing standards will be posted on the Company's website.

- Although waivers of this code are not anticipated, any amendment to or waiver of this Code with respect to an Executive Officer or Director shall require approval of the Board of Directors. In addition, any amendment to or waiver of this Code with respect to an Executive Officer or Director shall be disclosed within four (4) business days of such action on the Company's website for a period of not less than twelve (12) months, or in a filing on Form 8-K with the SEC.

- Records of any disclosures relating to waivers of this Code shall be retained for no less than five years.

Approved by the Audit Committee on October 7, 2024

RE: Question about Qualcomm EthicsPoint HRC0673096

보낸사람 [redacted]@qualcomm.com>

받는사람 CHEOL WOONG LEE

참조 [redacted]

Feb 7 2024 (Weds) 12:37 PM

첨부 2개 77KB 모두저장 | 이미지로 보기 ! 파일 저장 시 바이러스 검사 자동 수행

Spruce_TPC_LLDR.pdf 66.1KB

attach(3).eml 10.7KB

Hi Cheol,

I am happy to provide insight into the HRC0673096 request you submitted. As you stated, the case had been "escalated to HRA for further investigation". The case was not closed, but rather the case itself was moved out of our ticketing system and into our tracking system that we use to manage cases when people raise HR-related concerns. I provided you the findings in a previous email and have attached a copy here for your reference.

In regards to the LLDR, as I previously have confirmed, the document has been preserved and we will make it available as necessary and appropriate. As you know, the document is a Powerpoint that is full of engineering detail. It does not contain any references to your days or hours worked, other than the title slide, it a purely technical document. I have attached to this email a copy of the cover slide, which shows your name as one of the authors. Other than that, we have a good faith belief that this has no relevance to your claims raised with the CRD. Nevertheless, we confirm that we have preserved it, and if the CRD needs to review it, we can arrange that.

[redacted]

*** Visit go/myHR for direct access or to connect with a member of the People Solutions team.***

From: CHEOL WOONG LEE <[redacted]
Sent: Tuesday, February 6, 2024 3:52 PM
To: [redacted]@qualcomm.com>
Cc: [redacted] <[redacted]qualcomm.com>
Subject: Question about Qualcomm EthicsPoint HRC0673096

WARNING: This email originated from outside of Qualcomm. Please be wary of any links or attachments, and do not enable macros.

Hi [redacted]
(shared with [redacted] only)

I have lived my life valuing integrity and honesty as if they were my life.
From that perspective, there are parts about Qualcomm EthicsPoint that I simply cannot understand.

On May 23, 2023, I made a phone call and received Ticket # HRC0673096 from Qualcomm EthicsPoint.
At that time, since I did not have access to my Qualcomm Account, phone calling was the only method available to me.
The person I spoke with was Divya Bettegowda, and she told me that I would soon receive a phone call from Qualcomm EthicsPoint.

Despite waiting, no call came, and it was not until September 2023 that I discovered the ticket had been assigned to you.

Exhibit E

By then, the case had been closed with a note dated May 25, 2023, stating "Case has been escalated to HRA for further investigation."
This note appears to have been written by you. Could you explain what this note means?
What does the HRA organization do, and who was in charge of HRA at that time?

I perceived that you intentionally closed Ticket # HRC0673096 in September 25, 2023.
If this is not the case, please clarify. I do not wish to misunderstand you; I simply want to know the truth.

The Qualcomm I knew was a company that valued Ethics and encouraged internal whistleblowing on Injustice within the company.
However, when I actually tried to use Qualcomm EthicsPoint, I was shocked to find that it seemed more focused on silencing everything.
This led to my immense frustration and was a decisive factor in filing a CRD Lawsuit on October 5, 2023.

If there has been any misunderstanding on my part, please provide a thorough explanation. I am willing to listen.
I have attached three pieces of document evidence that can substantiate the situation at the time.

Sincerely,
Cheol Woong Lee