



## MODERN SLAVERY STATEMENT

### Introduction

In accordance with the Commonwealth Modern Slavery Act 2018 (the Act), this document represents the second Modern Slavery Statement submitted by Australasian Medical and Scientific Ltd (ABN 34 725 391 179) (AMS L) in relation to the reporting period 1 January 2023 to 31 December 2023. References in this statement to “we”, “us” or “our” refers to AMS L unless stated otherwise.

The purpose of this Statement is to identify and evaluate modern slavery risk in AMS L’s operations and supply chains and to outline our approach in assessing and mitigating these risks. Importantly, when we refer to ‘risk’ in this statement, it is a reference to the risk of harm to people, as opposed to business risk.

Modern slavery occurs in many forms here in Australia and overseas, such as slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services. We recognise the need for all businesses, including ours, to exercise due diligence to mitigate modern slavery practices within our spheres of influence.

### About AMS L

Founded in 1991, AMS L is a medical and scientific technology distribution company that operates throughout Australia helping people living with diabetes. AMS L partners with world leading medical device innovators to introduce and distribute medical technology products for the benefit of patients and healthcare providers.

In August 2021, AMS L was acquired by DexCom, Inc. (NASDAQ:DXCM) (DexCom). DexCom is a global company headquartered in San Diego, California (US) that develops, manufactures, produces, and distributes continuous glucose monitoring systems for diabetes management. DexCom’s global footprint is shown in the image below.





## Structure and Operations

### Structure

Following DexCom's acquisition, DexCom assumed full and direct control over AMSL's regulatory and compliance processes. AMSL continues to manage its own procurement processes. AMSL follows Dexcom's global policies on employment and business operations. As a global company, DexCom regularly updates its compliance standards to meet regulatory requirements, including applicable Australian laws and regulations for medical technology products.

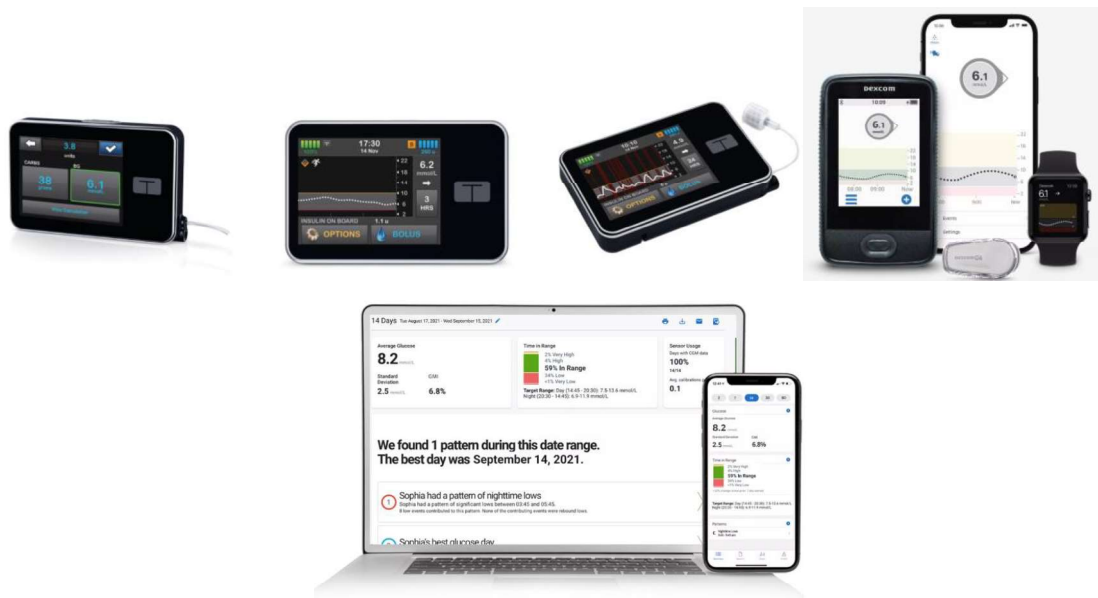
During the 2023 reporting period, AMSL had six business divisions, namely, Diabetes, Medical, Allergy, Point of Care, Regenerative Medicine and Scientific. In the first half of 2024, AMSL divested all its non-diabetes divisions.

Apart from the Diabetes division, the other five divisions' procurement functions were managed autonomously by AMSL. For the Diabetes division, the procurement of the medical device products is managed by DexCom, Inc.

AMSL's support functions, such as legal, regulatory affairs, quality assurance, finance, IT, marketing, customer service, and warehouse operation divisions, provide support for AMSL's operations.

### Operations and Supply Chain

AMSL's key activities are to sell and distribute medical technology products, including Insulin Pump Therapy, Continuous Glucose Monitoring and web-based diabetes management software. AMSL has 160 employees located around Australia. Their roles are predominantly sales, marketing and distribution related.



AMSL's supply chain predominately comprises the finished products described above, warehousing, contract labour, facilities and cleaning services, ICT hardware and software, professional services such as legal, IT and accounting, utilities, merchandise, finance, shipping and logistics. Our most significant supplier is our related entities who supply the products we sell to customers.



AMSL's top 5 external suppliers by value and are domiciled in the following locations:

No	Value Range (2023)	Domiciled
1	> AUD 30 million	US
2	> AUD 7 million	Australia
3	> AUD 3 million	Australia
4	< AUD 3 million	US
5	< AUD 3 million	US

## Risks of Modern Slavery in Our Operations and Supply Chains

In assessing the risk of modern slavery within our domestic Australian operations and supply chain, we considered the following factors:

- Control over procurement process (domestic goods and services);
- Employment terms and conditions; and
- Business roles and responsibilities.

### In Our Operations

In terms of employment of our workforce, AMSL directly employs its workers and has oversight of labour regulations and management. The majority of our employees are field based sales representatives. AMSL operates within the medical technology industry that is dominated by a highly-skilled labour force and stringent regulations. All AMSL employees are covered by Health Professionals and Support Services Award 2020. The combination of AMSL's compliance with Australian labour regulations, our workforce profile and our policy framework safeguarding employee rights in the workplace means that there is a low risk of AMSL having caused or contributed to modern slavery in our operations.

### In Our Supply Chain

As previously mentioned, AMSL manages its procurement process, whereby AMSL procures its own domestic goods and services but must obtain approval from DexCom's APAC function prior to engaging with any new supplier of end-products to be sold to customers. While not directly controlled by the global office, as a subsidiary, AMSL remains bound by DexCom's global procurement policies and regulations, including the Supplier Code and Code of Conduct. This helps AMSL to mitigate the prospect of modern slavery risk, as DexCom globally employs stringent measures against modern slavery risk within its supply chain and operations as indicated in the previous section.

As a procurer of goods and services, AMSL may be linked to modern slavery via in the sub-tiers of our supply chain. In order to better understand our connection to the risks of modern slavery in our supply chain, we have had regard to relevant drivers of risk, including:



- Geography;
- Industry practices;
- Labour status; and
- High risk products.

Based on the factors above, modern slavery may exist in the following areas within AMSL's supply chain, summarised in the table below:

Supply Chain	Potential Modern Slavery Risks
Cleaning services Warehousing services Temporary labour for unskilled work	Sectors dominated by manual labour activities and migrant workers may be prone to labour exploitation that can be linked to debt bondage, forced labour and human trafficking.
ICT Manufacturing	ICT hardware, medical devices and scientific technology products containing batteries and electronics contains critical minerals extracted and processed in high risk countries and in complex supply chains often involving the worst forms of child labour, human trafficking, debt bondage and forced labour. The complexity in supply chains means that the end user and retailer of the finished products have little to no visibility in relation to the sourcing or origins of the materials. Some products may be manufactured in locations that have been assessed as higher risk for modern slavery by the Global Slavery Index, including in Asia Pacific.
Shipping and logistics	There have been ongoing widespread reports of seafarer exploitation on board cargo ships around the world. Seafarers work in dangerous and remote locations with limited resource to remedy when at sea. The use of flag of convenience vessels can often result in labour rights being compromised.

As of 31 December 2023, AMSL had a total of fourteen personnel who were contractors:

- Point of Care division engaged three contractors. As previously mentioned, AMSL divested the Point of Care division, and, as of 16 March 2024, these personnel are no longer engaged by AMSL, and
- Diabetes division had a total of eleven contractor personnel for IT, warehouse and administration work. Based on AMSL's review of the Diabetes division's current suppliers, our top 10 suppliers are located across the US and Australia which are considered by the Global Slavery Index as having a lower prevalence of modern slavery. However, companies domiciled in lower risk countries may still have operations and supply chains in higher risk countries, so we do not assume that the country risk is automatically low by virtue of the country of domicile of our suppliers, which may not be the same as the origin of the goods or services supplied.

We expect suppliers to ascribe to the utmost compliance with industry practice, workers' health and safety, and employment benefits and wellbeing.



## Our Actions to Mitigate Modern Slavery Risk



### Governance

As a global group, DexCom and its subsidiaries, including AMSL, recognise the risk of Modern Slavery within our supply chain. This risk is discussed and managed at the board level of DexCom. DexCom has developed specific measures and procedures to address modern slavery risks at a global level. These are described in further detail below.



### Policies and controls that continued to apply during 2023

DexCom directly controls and regulates AMSL's compliance and regulatory divisions through its Supplier Code of Conduct (Supplier Code), Code of Conduct & Business Ethics (Code of Conduct) and Conflict Minerals Policy. These documents are available via Dexcom's [suppliers webpage](#).

DexCom's [Code of Conduct and Business Ethics](#) outlines our commitment to maintaining and improving systems and processes to mitigate human rights and modern slavery, by:

- Evaluating and addressing risk;
- Obtaining certifications from suppliers that they have received, read, understand, and will comply with applicable laws, regulations, and Dexcom policies;
- Holding violators accountable;
- Training Employees involved in manufacturing and supply chain activities; and
- Reserving the right to audit employees and suppliers for compliance.

DexCom's [Supplier Code of Conduct](#) sets out the minimum standards of ethical business conduct for suppliers, vendors, and other third-party providers of goods and services to DexCom's business and their direct and indirect affiliates, including parent companies and subsidiaries, such as AMSL. The Supplier Code of Conduct specifies that suppliers must abide by social responsibility requirements, including:

- not using anyone under the age of 18 in connection with work that exposes such person to dangerous or hazardous conditions, or where the safety or welfare of the person is at risk; and
- ensuring that all work is voluntary and workers have the freedom to terminate employment with the supplier at any time without penalty, punishment or retribution;

DexCom's [Conflict Minerals Policy](#) seeks a commitment from suppliers associated with the extraction, transportation or trade of minerals, to not knowingly profit from, contribute to, assist with or facilitate the:

- use any forms of torture, cruel, inhuman and degrading treatment including any forms of forced or compulsory labour, the worst forms of child labour; and
- other gross human rights violations and abuses or war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

DexCom's [Anti-Human Trafficking Policy](#) applies to all personnel employed or engaged by DexCom including permanent employees, part-time and contract workers, suppliers, vendors, and third-party



providers of goods and services. It prohibits forced labour, the use of misleading or fraudulent practices during the recruitment of candidates or employment offers, seizure of an individual's identity or immigration documents, and charging candidates recruitment fees.

To support and verify compliance with the above policies, DexCom maintains quality control and other audit standards as part of its ethics and compliance program which provides suppliers with information on the expectations regarding procurement policies.



### Training and due diligence

Between 2023 and Q1 2024, AMSL undertook actions to address the actions outlined in AMSL's 2023 Policy Statement. Below is a summary of AMSL's key actions:

1. During 2023, AMSL's division managers completed training on DexCom's Anti-Human Trafficking Policy. The objective of this training was to ensure AMSL's division managers increase awareness of, and capability to comply with, the key requirements of this Policy;
2. During 2023, a consultant was engaged to develop a holistic supplier modern slavery assessment framework providing a high level of how human rights considerations can be embedded as part of our business as usual both in our operations and supply chains and also identify categories of suppliers that should complete the Modern Slavery Questionnaire (**MSQ**);
3. During 2023, AMSL undertook system analysis to identify and purchase a system (Ethixbase360) to manage Modern Slavery risks. In Q1 2024, AMSL configured and implemented the Ethixbase360 platform to:
  - a. Conduct an initial risk assessment of AMSL's current diabetes suppliers, based on the supplier modern slavery assessment risk framework. AMSL excluded non-diabetes divisions' suppliers, because these divisions were divested and suppliers supporting the non-diabetes divisions were no longer engaged;
  - b. Identify suppliers to complete the MSQ on the Ethixbase360 platform; and
  - c. Request suppliers to complete the MSQ. For the suppliers who completed the MSQs, the overall modern slavery final risk rating was low.



### Approach to remediation

Anyone with concerns regarding actual or suspected violations of DexCom’s policies can make a report via multiple avenues. The avenues are published and accessible online. Information on the grievance mechanisms is summarised in DexCom’s sustainability report, and shown below.

#### Open Dialogue

We encourage Employees to keep open lines of communication with their supervisor and/or department management.

#### The Compliance Department


The Compliance Department is also a resource for reporting concerns and asking questions and can be reached at [compliance@dexcom.com](mailto:compliance@dexcom.com).

Dexcom’s [Compliance Intranet Website](#) provides additional information, including a global directory of Compliance Personnel; links to the Compliance Helpline; current policies, procedures, and resources; and training materials.


Resources on the Compliance Intranet Website, including some of the policies linked throughout the Code, are available in additional languages.

#### Compliance Helpline


Dexcom also has a Compliance Helpline, hosted by NAVEX, a third-party helpline provider. Reports through the Helpline may remain anonymous. The Compliance Helpline can be reached by:




**Phone:**  
Dial **(866) 384-4277** in the US or refer to the list of contact numbers on the EthicsPoint website (below) if you are located outside the US.



**Mobile:**  
[Click Here](#)



**Web:**  
[Click Here](#)



#### Other Resources

Many other internal departments have policies and procedures in place to ensure adherence to the Code. These include Human Resources, Information Technology/Security, Environmental Health & Safety, Legal, Quality, Finance, and Procurement.

Please reach out to these departments with any questions or concerns you may have.

### Assessing Effectiveness

To assess the effectiveness of the measures we have in place to mitigate modern slavery risks, we will progress the actions set out in the table below. Dexcom’s APAC Compliance Subcommittee and Dexcom’s Board of Directors will receive periodic updates on our progress as we move towards the preparation of our next modern slavery statement.

Actions	Objectives
Continue to analyse AMSL’s new and active suppliers against the supplier modern slavery assessment risk framework.	Identify AMSL’s new and current suppliers who should complete the MSQ.
Continue to encourage suppliers to complete the MSQ and engage with them on why they are being asked questions about modern slavery.	Increase the MSQ completion rate as part of our efforts to increase visibility in relation to modern slavery risks in our supply chain.
Train new AMSL employees on modern slavery related policies.	Increase awareness of modern slavery red flags within our workforce.



Actions	Objectives
Develop detailed guidance for the implementation of the supplier modern slavery assessment risk framework and management of high risk suppliers, e.g., record potential high risk suppliers in a Due Diligence system for ongoing monitoring.	Support employees with a procurement function on how to maximise the utility of the MSQ to improve year on year insights on modern slavery red flags within our supply chain.

## Consultation

AMSL does not have any owned or controlled entities.

This Modern Slavery Statement was approved by AMSL's Board of Directors and signed by Michael Brown, AMSL's Director and Dexcom's Chief Legal Officer.

Signed:

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**Michael Brown**  
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Michael Brown

EVP, Chief Legal Officer

June 11, 2024





## Statement Annexure

<b>Modern Slavery Act 2018 (Cth) Reporting Criterion</b>	<b>Page number</b>
1 & 2. Identify the reporting entity and describe its structure, operations and supply chains	1 – 3
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	3 – 4
4. Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	5 – 7
5. Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	7 - 8
6. Describe the process of consultation with any entities the reporting entity owns or controls	8