

MODERN SLAVERY STATEMENT 2023

Introduction

In accordance with the Commonwealth Modern Slavery Act 2018 (the Act), this document represents the initial Modern Slavery Statement submitted by Australasian Medical and Scientific Ltd (AMSL). The statement has been prepared because AMSL's revenue exceeded the threshold of AUD 100 million in 2022. However, we note that the objectives and principles embodied in the Act are consistent with AMSL's general ESG-related policies and standards.

In terms of preparation, the methods employed involved document and policy reviews, as well as interviews and consultations with key stakeholders and decision makers. Consideration has also been given to the existing guidance provided by Department of Home Affairs for the preparation of modern slavery statements.

The purpose of this Statement is to identify the current modern slavery risk in AMSL's operations and supply chains and outline our proposed approach to develop frameworks and policies to address any current and future risks.

We recognise that modern slavery may occur 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 further recognise our obligation to exercise our responsibility to help minimise modern slavery practices in Australia.

About AMSL

Founded in 1991, Australasian Medical & Scientific Ltd (AMSL) is a medical and scientific technology distribution company that operates throughout Australia in the following areas: diabetes, medical, allergy, point of care, regenerative medicine, and scientific. AMSL partners with world leading medical device, pharmaceutical, and scientific innovators to introduce and distribute healthcare and scientific technology products for the benefit of patients, healthcare providers, and quality assurance professionals.

In August 2021, AMSL was acquired by DexCom, Inc. ("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.

Relationships and Factors Arising from the Acquisition by DexCom

Following the 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 and scientific technology products.

In terms of the procurement process, AMSL's business divisions must prepare and submit a business case to DexCom's APAC function, prior to procuring a new product for sales and distribution. The business case requires the business division to demonstrate the market need, community acceptance, and profitability of the proposed medical or scientific technology product, for sale in the Australian market. AMSL must further ensure that the proposed goods are compliant with applicable Australian's laws and regulations, prior to distributing the products within Australia. DexCom's APAC functions will review this proposal and provide approval for the sales and distribution of the products. This process applies to all of AMSL's business divisions, except for the Diabetes division. AMSL's Diabetes division solely distributes goods from DexCom, Inc. and its preferred suppliers, e.g. Tandem pumps.

Structure and Operations

Reporting Entity

This Modern Slavery Statement (Statement) has been prepared by the Australasian Medical & Scientific Ltd (AMSL) and covers the activities of AMSL (ABN 34 725 391 179) for the financial year ended 31 December 2022.

Structure

Following the acquisition by DexCom, AMSL became a subsidiary of Dexcom but retained its name and brand within the Australian market for marketing and recognition purposes. AMSL has six business divisions: Diabetes, Medical, Allergy, Point-of-Care, Regenerative Medicine, and Scientific. Apart from the Diabetes division, the other five divisions' procurement functions are 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 the operations of AMSL's 6 business divisions.

Operations

The key activities of AMSL are to sell and distribute medical devices, pharmaceutical and scientific technology products, in divisions known as: Diabetes, Medical, Allergy, Point-of-care, Regenerative Medicine, and Scientific. The Diabetes division sells such products as Insulin Pump Therapy, Continuous Glucose Monitoring, Blood Glucose Monitoring, and web-based diabetes management software. The Medical division sells medical devices and medicines covering a wide range of areas, including enteral feeding, infection control, oncology, and gastroenterology. The Allergy division's product offerings include immunotherapy testing, and treatments such as sublingual and subcutaneous immunotherapy, as well as skin prick and patch testing. The Point-of-Care business line sells a wide range of diagnostic equipment and reagents for point-of-care patient testing. The Regenerative Medicine division sells surgical and non-surgical appearance-enhancing, dermatology, and vascular products. Finally, the Scientific division offers bioscience and food quality assurance products. AMSL purchases, stores and delivers these products and technologies to their customers within Australia.

Risks of Modern Slavery Practices in Our Operations and Supply Chains

DexCom directly controls and regulates AMSL's compliance and regulatory divisions through its Supplier Code of Conduct (Supplier Code) and Code of Conduct & Business Ethics (Code of Conduct). These two policies recognise modern slavery concepts in the regulation of AMSL's supply chain, such as principles concerning anti-human trafficking, anti-child labour, fair treatment of labour forces, workplace safety and health, wages and benefits, and hours regulation among others. Our Code of Conduct makes clear references to the adherence of all applicable domestic laws and regulations, which includes the Act.

Our Supplier Code is extensive and applies to all 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. In addition, Dexcom has ESG obligations that regulate hazardous materials handling, minerals of conflict, waste and emissions process and procedures, spills and releases, and environmental sustainability. Dexcom issues an annual Sustainability Report. In ensuring compliance among our suppliers for these range of issues, DexCom maintains quality control and other audit standards, providing the suppliers with detailed expectations regarding procurement policies, in line with our ethics and compliance program.

As a global company, DexCom and its subsidiaries, including AMSL, recognises the risk of Modern Slavery within our supply chain, and this risk is discussed and managed at the board-level. DexCom is now in the process of developing specific measures and procedures to address modern slavery risks at a global level.

In our effort to recognise and combat Modern Slavery, we maintain an Anti-Human Trafficking Policy dedicated to identifying and strictly prohibiting forced labour, indentured servitude, and commercial sex labour within all components of our supply chain. We further prohibit the usage of misleading or fraudulent practices during the recruitment of candidates or employment offers. We seek to identify and prohibit illegal practices such as destroying, concealing, confiscating, or otherwise denying access to an individual's identity or immigration documents, such as passports or drivers' licenses, regardless of the issuing authority. Our Anti-Human Trafficking Policy represents an active effort to combat modern slavery and 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.

Further to these themes, on an annual basis, DexCom issues a Statement of Compliance with California's 'Transparency in Supply Chains Act' and the UK's 'Modern Day Slavery Act', to demonstrate compliance among the following six DexCom entities:

- DexCom, Inc.
 - DexCom International Limited
 - DexCom (UK) Limited
 - DexCom (UK) Intermediate Holdings Ltd
 - DexCom (UK) Distribution Limited
 - DexCom Operating Ltd
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AMSL is a subsidiary of DexCom and is subject to the latter's stringent standards in keeping their supply chains free of modern slavery risks and occurrences. Based on these prescribed standards and policies, we have examined AMSL's current supply chain and present our risk analysis below.

Review of Operations: Risk Assessment

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

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

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 product supplier. 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.

In terms of employment terms and conditions, AMSL has a direct employment relationship with our onshore employees and service providers in Australia, which allows maximum control over our internal supply chain operation and labour force regulation and management.

AMSL's products are regulated by applicable Australian laws and regulations. Furthermore, our procurement process for both medical devices and technologies for sales and distribution purposes and the services rendered for AMSL daily business operations are managed by DexCom's relevant functions, including global compliance. This helps us to mitigate the prospect of modern slavery risk, as DexCom globally employs stringent measures against modern slavery risk within their supply chain and operations as indicated in the previous section. Based on these assessment criteria, we identify a low risk of modern slavery in our direct operations.

In Our Supply Chain

Controls that are being exercised in AMSL's supply chain are both centralised and global in nature. In assessing the exposure of AMSL as a receiver of goods and services, globally sourced, that may embody modern slavery practices, we have taken a broad risk analysis approach based on several factors, including:

- Geography;
 - Industry practices;
 - Labour status; and
 - Traded goods.
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Based on the factors above, we identify that modern slavery risk has the potential to exist in the following areas within our supply chain, which are summarised in the table below:

Supply Chain	Potential Modern Slavery Risk
Cleaning services	Sectors dominated by manual labour activities and migrant workers may be prone to poor labour legislations and practices.
Sales and business divisions	Packaging materials used to produce the medical devices and scientific technology may come from high-risk countries with histories of poor labour legislations and practices.
ICT	Goods and equipment produced in factories in countries with histories of poor labour legislations and practices (i.e., China, India, and other Asian countries have been identified by Australian government as high-risk in a modern slavery context).
Warehousing services	Sectors dominated with manual labour activities and migrant workers are prone to poor labour legislations and practices.

For the elements of AMSL's supply chain including cleaning services, ICT, and warehousing, we are confident that they carry a low risk of modern slavery practices.

All AMSL employees, except for those relating to the warehouse function, are covered by Health Professionals and Support Services Award 2020. While we identify warehousing to be a risk sector, we are confident that AMSL's warehousing function is well protected, because they are AMSL's employees and covered under the Road Transport & Distribution award 2020, except for two temporary personnel. We remain conscious of the modern slavery risks in the cleaning services and ICT industries. Because DexCom requires its suppliers to comply with its global requirements for the procurement of goods and services, we are able to mitigate the risk of non-compliance with domestic regulations, including Australian modern slavery legislation. As previously mentioned, DexCom has in place a Supplier Code, Code of Conduct, and Anti-Human Trafficking policy, which help to identify and prohibit forms of modern slavery within its operational supply chain.

DexCom also has a reporting mechanism, the Compliance Helpline, that is managed by an independent service provider (Navex), whereby employees, suppliers and third parties can report concerns, including any suspected incident of modern slavery. Further, AMSL has processes to manage its business divisions and support functions, and the Legal function manages the contracts with all service providers, which increases AMSL's control over its suppliers' conduct.

We further analyse the goods that AMSL distributes to the Australian market based on the four factors identified above and conclude that there is a relatively minimal risk of modern slavery within our supply chain.

Based on a review of our supplier list, we have a total of 57 medical device and scientific technology suppliers across North America, Europe, and East Asia. We have identified 18 US and North America based suppliers, 8 UK based suppliers, 14 Australia based suppliers, 13 European based suppliers

(Spain, Italy, Germany, Denmark, and the Netherlands), and the remaining four suppliers are from Japan, Taiwan and Singapore.

It is increasingly the case that businesses operating in these jurisdictions, which have significant ESG and human rights-based laws, are required to conform to the types of regulatory requirements that are contemplated in the Act. As such, we have used supplier's home country jurisdiction as an indicator of likely risks in terms of modern slavery practices.

Based on geographic region, all of AMSL's suppliers are located in countries with strict labour regulations and some type of modern slavery legislation, especially the US, UK, and Australia. We operate within the medical device and scientific technology industry, which is dominated by a highly-skilled labour force and stringent regulations. We expect industry players in this space to ascribe to the utmost compliance with industry practice, workers' health and safety, and employment benefits and wellbeing. There is a minimal chance that the labour force employed in this industry will be low-skilled, low-paid or subject to hazardous working conditions. We remain cautious over the potential modern slavery risk within the production line of the packaging materials for the medical devices or scientific technology products manufactured by our suppliers. Presently, we do not have visibility into our suppliers' supply chain and operations beyond what is reasonably expected of us to know. However, as our suppliers are concentrated within geographical areas with strong labour regulations, we are confident that our goods have significantly lower risk of modern slavery than otherwise.

Top 5 suppliers by Value and Origin

No	Value Range (2022)	Supplier Origin
1	> \$50 million AUD	US
2	< \$50 million AUD	US
3	< \$50 million AUD	ES
4	< \$50 million AUD	US
5	> \$10 million AUD	UK

Our Actions to Mitigate Modern Slavery Risk

In March and April 2023, we reviewed our existing employment and procurement policies and identified that we have a comprehensive policy framework to acknowledge and address modern slavery risk within our supply chain and operations.

We have conducted awareness training sessions on Australian Modern Slavery legislation requirements to our AMSL personnel to ensure our key personnel and decision makers are aware of the current regulations. The trainings were conducted online and were attended by our business division

managers. These trainings aimed to check the degree of awareness that our current personnel had regarding the regulations and serve as a platform for them to express concerns over the Act's impact on their daily business activities.

While we have comprehensive policies in place, AMSL has not developed a practical approach to audit our suppliers' compliance with DexCom's Supplier Code and the Anti-Human Trafficking policy. We propose the following approach in the table below, in the order of priority, to address this gap.

Actions	Objectives	Priority level
Develop a supplier modern slavery assessment risk framework.	Identify types or categories of suppliers that should complete the supplier risk questionnaire that covers modern slavery topics.	Moderate
Analyse AMSL's current / active suppliers against the supplier modern slavery assessment risk framework.	Identify AMSL's current suppliers that should complete the supplier risk questionnaire.	Moderate
Request selected suppliers complete the supplier questionnaire.	Determine level of compliance with DexCom's policy and domestic Modern Slavery legislation for selected suppliers.	Moderate
Record potential high risk suppliers in a Due Diligence system for ongoing monitoring.	Continuous monitoring of high-risk suppliers for negative media.	Moderate -
Assign Modern Slavery related policies to targeted AMSL employees (based on their job responsibilities) for completion.	AMSL employees are trained on internal Modern Slavery related policies.	Moderate

Assessing Effectiveness

We will rely on our suppliers' policy records and documents, and will further consult key personnel and decision makers to produce an accurate assessment of our suppliers' compliance level and awareness of Modern Slavery concepts. We will consider employing, in the future, a third-party auditor to conduct compliance audits at our suppliers' sites and utilise their reports for our decision making. Any identified breach or non-compliance will be addressed through actions that may include warnings, penalty, or termination of engagement.

Consultation

AMSL consulted with the business divisions and reviewed its current procurement practices. This Modern Slavery Statement was approved by AMSL's Board of Directors.

Conclusion

As a subsidiary of DexCom, AMSL follows the broader group's commitment towards responsible social and environmental governance. We deem addressing modern slavery risks as an ongoing journey for the company. This Statement is a representation of that journey as we progressively move from internal company awareness to external awareness of modern slavery risk within our groups of suppliers. We attempt to progressively address external modern slavery risk within our suppliers by developing monitoring mechanism and compliance policies that correspond with our obligations under the Act.

Signed:

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Scott Allan Moss
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Scott Allan Moss

Vice President and General Manager, Asia Pacific

16 June 2023
