

DEXCOM MODERN SLAVERY REPORT 2024

1. Introduction

This document represents the Modern Slavery Report submitted by DexCom, Inc. (“**DexCom, Inc.**” or “**Dexcom**”), Australasian Medical & Scientific Limited (“**AMSL**”), Dexcom (UK) Intermediate Holdings Limited (“**Dexcom Holdings**”), Dexcom (UK) Ltd. (“**Dexcom UK**”) and Dexcom Canada, Co. (“**Dexcom Canada**”), (collectively the “**Reporting Entities**” or “**we**” or “**our**”) (the “**Report**”). This Report relates to the financial year ended December 31, 2024 (“**Reporting Period**”).

Australasian Medical & Scientific Limited reports pursuant to Australia’s *Commonwealth Modern Slavery Act 2018*.

Dexcom Canada and Dexcom Holdings report pursuant to Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

DexCom, Inc. and Dexcom UK report pursuant to the United Kingdom’s *Modern Slavery Act 2015* and the *California Transparency in Supply Chains Act of 2010*.

Modern slavery is an umbrella term used to describe situations of exploitation where a person cannot refuse or leave because of threats, violence, coercion, deception or abuse of power. The purpose of this Report is to: (a) describe the measures put in place by the Reporting Entities during the Reporting Period to address modern slavery risks, including forced labour, child labour, slavery, servitude and human trafficking (collectively “**Modern Slavery**”), in their respective operations and supply chains; (b) identify and evaluate Modern Slavery Risks in the Reporting Entities’ respective operations and supply chains; and (c) outline their approach to manage any current and future risks. Where we use the term “risks” in this Report, it refers to the risk of harm to people rather than the risk of harm to our business.

2. Steps Taken to Prevent and Reduce the Risks of Modern Slavery

In general terms, during the Reporting Period, the Reporting Entities continued to implement policies and procedures used for specifically addressing Modern Slavery and for identifying and mitigating Modern Slavery in our activities and supply chains. Specifically, an Anti-Human Trafficking Policy, a Conflict Minerals Policy, a Supplier Code of Conduct and a Code of Conduct & Business Ethics were in use. Collectively, these documents address and consider Modern Slavery practices, and prohibitions related to same.

The Reporting Entities strive to operate with the highest standards of ethics and integrity. Modern Slavery and other exploitative practices have no place in our operations, and we expect our suppliers or other third-party vendors to adopt similarly high standards. Dexcom will not tolerate or condone human trafficking or slavery in any part of our global organization.

3. Structure, Activities and Supply Chains

a. Structure

i. Dexcom, Inc.

DexCom, Inc. (NASDAQ: DXCM) is the United States-based global head responsible for developing, manufacturing, producing and distributing Continuous Glucose Monitoring (“CGM”) systems worldwide. A CGM system is a wearable device that tracks glucose levels continuously throughout the day and night. Glucose readings are transmitted via Bluetooth to a smartphone, smart device or receiver, providing dynamic data, including current glucose levels and historical trends, that can help people living with type 1 or type 2 diabetes to proactively manage their diabetes treatment.

DexCom, Inc. is also responsible for manufacturing, producing and distributing the Stelo glucose biosensor, an over-the-counter wearable device built on the Dexcom G7 CGM system that sends glucose values directly to a smartphone. This device and data can help adults not on insulin who have been diagnosed with type 2 diabetes or prediabetes and are not at risk for hypoglycaemia, and those interested in tracking their glucose. Stelo is only available in the United States.

DexCom, Inc. is headquartered in San Diego, California and reports pursuant the United Kingdom’s *Modern Slavery Act 2015* (“UK Act”) and the *California Transparency in Supply Chains Act of 2010* (“California Act”).

The California Act and section 54 of the UK Act are designed to provide consumers and stakeholders with information regarding manufacturers’, retailers’ and reporting organizations’ efforts to address the issue of slavery and human trafficking in their supply chain.

ii. Australasian Medical & Scientific Limited

Australasian Medical & Scientific Limited (“AMSL”) is a medical and scientific technology distribution company that operates throughout Australia helping people living with diabetes. AMSL partners with world leading medical device innovators to introduce and distribute medical technology products for the benefit of patients and healthcare providers.

AMSL reports pursuant to section 13 of Australia’s *Modern Slavery Act 2018* (Cth) (“Australian Act”).

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

iii. Dexcom (UK) Intermediate Holdings Limited.

Dexcom Holdings is a private limited company existing under the laws of England and Wales. Dexcom Holdings is a holding company with no operations or employees.

Dexcom Holdings reports pursuant to Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (“Canadian Act”).

iv. Dexcom (UK) Ltd

Dexcom UK is a private limited company incorporated under the laws of England and Wales, operating primarily in the United Kingdom.

Dexcom UK reports pursuant to the UK Act and the California Act.

v. Dexcom Canada, Co.

Dexcom Canada is a corporation incorporated under the laws of Nova Scotia, Canada, conducting business in Canada and primarily operating out of British Columbia. Dexcom Canada is a fully-owned subsidiary of Dexcom UK.

Dexcom Canada reports pursuant to the Canadian Act.

Dexcom Canada, Dexcom Holdings, Dexcom UK, and AMSL are affiliate companies of DexCom, Inc.

Each Reporting Entity follows DexCom, Inc.'s global policies on employment and business operations. As a global company, Dexcom regularly updates its compliance standards to meet regulatory requirements, including applicable Canadian, United Kingdom, and Australian laws and regulations for medical technology products.

Dexcom's global footprint is shown in the image below.



b. Activities

i. DexCom, Inc.

DexCom, Inc. is the United States-based global head responsible for developing, manufacturing, producing and distributing CGM systems worldwide.

ii. Dexcom UK

Dexcom UK sells and distributes medical technology products including CGM systems outside the United States. Dexcom UK has 283 employees in the United Kingdom, primarily in sales, marketing and distribution roles.

iii. AMSL

AMSL sells and distributes medical technology products, including Insulin Pump Therapy, CGM and web-based diabetes management software. AMSL has approximately 124 employees across Australia. Their roles are predominantly sales and marketing related.

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 and distribution services function.

Apart from the Diabetes division, the other five divisions' 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, and customer service, provide support for operations.

iv. Dexcom Canada

Dexcom Canada distributes CGM devices across Canada, including the Dexcom G6 CGM System and Dexcom G7 CGM System (collectively the "Dexcom CGM Systems").

Dexcom Canada's business operations include both wholesale and retail distribution channels. Dexcom Canada sells products to consumers both directly through Dexcom Canada's eStore and through pharmacies across Canada.

There are four main functional departments that make up Dexcom Canada's operations, namely: Field Sales, Market Access & Trade, Inside Sales & Customer Services, and Marketing. These core teams are also supported by additional internal departments including Human Resources, Finance / Accounting, Sales Operations, Sales Training, and Medical Science & Education. As a collaborative team, all of Dexcom Canada's departments enhance its operational efficiency and service quality.

c. Supply Chain

Dexcom CGM Systems are manufactured exclusively in Mesa, Arizona in the United States by DexCom, Inc., and in Penang, Malaysia by Dexcom (Malaysia) Sdn Bhd.

Materials used to produce products, including printed circuit board subassemblies, wires, and batteries, are procured from a variety of countries around the world, including Mexico, Costa Rica, China, Malaysia, and Hong Kong.

i. Dexcom UK

Dexcom Malaysia and DexCom, Inc. are the manufacturers and suppliers of finished products to Dexcom UK. Finished products are imported directly into a third-party logistics (3PL) provider's distribution centre in the East Midlands by Dexcom UK, as the importer of record, where they are stored until they are shipped to customers.

ii. AMSL

AMSL's top 5 external suppliers by value are domiciled in the United States and Australia. AMSL's supply chain predominantly comprises the Dexcom CGM Systems, Tandem Insulin products (which

include three different categories of Insulin Pumps (Made and supplied from US), Cartridges/Infusion sets (Made in Mexico but supplied to AMSL from US), and Accessories (Made in China but supplied to AMSL from US)), and web-based diabetes management software, in addition to facilities and cleaning services, ICT hardware and software, professional services such as legal, IT and accounting, utilities, merchandise, finance, shipping and logistics. AMSL's most significant suppliers are its related Dexcom entities, who supply the products it sells to customers.

iii. Dexcom Canada

During the reporting period, DexCom, Inc. was the sole manufacturer and supplier of finished products to Dexcom Canada. Finished products are imported directly into Ontario, Canada by DexCom, Inc., as the importer of record, where they are stored at a third-party logistics (3PL) provider's distribution center until they are shipped to customers.

4. Policies and due diligence processes to mitigate Modern Slavery

The Reporting Entities recognise that Modern Slavery occurs globally, including in developed countries such as Canada, Australia, the United Kingdom, the United States. As defined earlier, Modern Slavery is an umbrella term and includes exploitative practices such as slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, the worst forms of 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 our operations globally and in our supply chains.

The Reporting Entities follow DexCom, Inc.'s global policies on employment and business operations. Dexcom Compliance standards are periodically updated to meet regulatory requirements, including applicable Canadian, Australian, United Kingdom, and United States laws and regulations for medical technology products. The following policies and processes continued to be in place during the Reporting Period.

a. Anti-Human Trafficking Policy

In our effort to recognise and combat Modern Slavery, in 2020, the Reporting Entities implemented Dexcom, Inc.'s Anti-Human Trafficking Policy, which is dedicated to defining and strictly prohibiting forced labour, indentured servitude, and commercial sex labour within our supply chain. The Anti-Human Trafficking Policy also provides that the usage of misleading or fraudulent practices during the recruitment of candidates or employment offers is prohibited. 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.

The Anti-Human Trafficking Policy represents an effort to combat Modern Slavery and applies to all personnel employed or engaged by the Reporting Entities, including permanent employees, part-time and contract workers, suppliers, vendors, and third-party providers of goods and services.

b. Supplier Code of Conduct and Code of Conduct & Business Ethics

The Reporting Entities work to regulate compliance and regulatory divisions of the Reporting Entities through Dexcom, Inc.'s Supplier Code of Conduct¹ (“**Supplier Code**”) and Code of Conduct & Business Ethics² (“**Code of Conduct**”) (collectively “**Codes**”). The Codes are administered by DexCom, Inc. and available via Dexcom’s global website under the Governance section.

The Codes recognise 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.

The Dexcom Code of Conduct refers to the adherence of all applicable domestic laws and regulations, and outlines our commitment to maintaining and improving systems and processes to mitigate Modern Slavery risks 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.

The Supplier Code applies to all suppliers, vendors, and other third-party providers of goods and services to the Reporting Entities’ business and their direct and indirect affiliates, including parent companies and subsidiaries. The Supplier Code 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.

In addition, the Reporting Entities have ESG obligations, under both applicable law and Dexcom policies, that regulate hazardous materials handling, minerals of conflict, waste and emissions process and procedures, spills and releases, and environmental sustainability.

c. Conflict Minerals Policy

DexCom, Inc.’s Conflict Minerals Policy³ 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:

¹ <https://dexcompdf.s3-us-west-2.amazonaws.com/Supplier-Code-of-Conduct.pdf>

² https://s201.q4cdn.com/758408164/files/doc_downloads/governance_docs/11/Dexcom-Inc.-Code-of-Conduct-and-Business-Ethics.pdf

³ https://s201.q4cdn.com/758408164/files/doc_downloads/governance_docs/Conflict_Minerals_Policy.pdf

- 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.

d. Commitment to Compliance, Privacy and Security

DexCom, Inc. issues an annual Sustainability Report. In addition, the Reporting Entities carry out quality control and other audit standards, which provide suppliers with detailed expectations regarding procurement policies, in alignment with our ethics and compliance program.

The Reporting Entities seek to promote an organizational culture that strives to encourage ethical conduct and a commitment to compliance with applicable laws, regulations, and industry codes of conduct. We further strive to empower employees to make the right decisions that protect our reputations as leaders in transforming diabetes care and management through our CGM technologies.

Additional information on our culture of ethics, integrity and compliance, including access to Dexcom, Inc.'s Compliance Program, Code of Conduct, Distributor Code of Conduct, Modern Slavery Statements, and Statement on Human Rights can be found via DexCom, Inc.'s [Trust Center website](#).

e. Statement on Human Rights

In early 2024, the Reporting Entities developed DexCom, Inc.'s Statement on Human Rights⁴ which includes key principles which, consistent with its Anti-Human Trafficking Policy and Code of Conduct, prohibit any direct or indirect use of child labour, forced labour, involuntary labour, or human trafficking. While the Statement on Human Rights was not in place during the Reporting Period, it has since been implemented and is publicly available via the [Dexcom Trust Center website](#).

f. AMSL's Modern Slavery Questionnaire

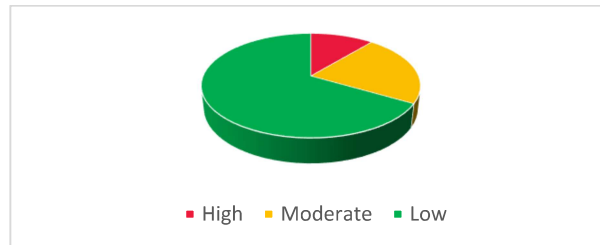
As flagged in AMSL's 2023 modern slavery statement, AMSL configured and implemented the Ethixbase360 platform in early 2024 to conduct an initial supplier risk assessment via an online modern slavery questionnaire ("MSQ"). This is now being treated as a pilot project for the Dexcom Entities.

The MSQ has an underlying algorithm which provides an overall risk rating based on the answers provided by suppliers. The algorithm draws upon international databases, including the US Department of Labor's List of Goods Produced by Child Labor or Forced Labor, World Bank Governance Indicators and the Global Slavery Index. The MSQ scoring is driven by the following indicators:

- Jurisdiction of operations and sourcing countries
- Industry of supplier / industry of goods and services supplied
- Products linked to child or forced labour
- Workforce profile e.g. utilisation of vulnerable workers
- Supplier's policies and controls to mitigate the risks of modern slavery

⁴ https://s201.q4cdn.com/758408164/files/doc_downloads/governance_docs/2024/dexcom-human-rights-statement.pdf

Based on the results of the completed questionnaires from the Reporting Period, the majority of suppliers received an overall low risk rating. The risk rating of high, moderate or low is underpinned by the weighting that each question-and-response combination is assigned. This has been designed to more accurately reflect the risks of a supplier, for example, a manufacturing company domiciled in Australia but operating its factories in Bangladesh will receive a rating to reflect the risks of manufacturing in Bangladesh.



By way of example, a supplier that received a high-risk rating during the Reporting Period was a manufacturing company domiciled in the United States but that has operating facilities in countries with an increased vulnerability to Modern Slavery such as Mexico. The supplier disclosed that they manufacture products supplied to AMSL containing material such as aluminium, cobalt and lithium but they have a responsible sourcing policy to mitigate the risks of Modern Slavery in the sourcing of higher risk raw materials. The supplier also indicated that they have a supplier code in place that requires their own suppliers to conduct due diligence for adverse human rights impacts, including Modern Slavery, and importantly, they had a process in place to monitor supplier compliance with their code.

The suppliers that received a moderate MSQ risk rating had scores that reflected their inherent industry risk (e.g. ICT hardware and technology), but they had undertaken steps to assess their human rights impacts by undertaking due diligence, including in relation to their supply chain. The companies indicated they had policies and controls in place to mitigate the risks of Modern Slavery in their operations and supply chains.

All suppliers that completed the MSQ confirmed that:

- their workers are free to join and participate in union activities
- no workers have had to surrender their passports or pay a fee to anyone to obtain work
- workers can resign upon providing notice
- they comply with all applicable labour and employment and industrial relations law

5. Risks of Modern Slavery in Our Operations and Supply Chains

The Reporting Entities recognize the risk of Modern Slavery within our operations and supply chain. This risk is discussed and managed at the board level. DexCom, Inc. has also developed specific measures and procedures to address Modern Slavery risks at a global level.

a. Risks of Modern Slavery in our business operations

i. Dexcom UK

Given that the business operations for Dexcom UK are conducted in the UK, we consider the risk of Modern Slavery, including forced labour and child labour, occurring within business operations to be low.

In assessing the risk of Modern Slavery practices within domestic Dexcom UK operations, Dexcom UK considered the following factors:

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

As an affiliate company of Dexcom, Inc., Dexcom UK remains bound by DexCom, Inc.'s global procurement policies and regulations, including the Codes.

In terms of employment terms and conditions, Dexcom UK has a direct employment relationship with employees and service providers in the UK, which allows a high degree of control over our internal supply chain operation and labour force regulation and management.

The procurement processes for the Dexcom CGM Systems and the services rendered for Dexcom UK's daily business operations are managed by Dexcom, Inc.'s relevant functions, including DexCom, Inc.'s Procurement Department and Corporate Compliance. This helps Dexcom UK mitigate the prospect of Modern Slavery risk, as they strive to employ stringent measures against Modern Slavery risk within their operations. Based on these assessment criteria, Dexcom UK identifies a low risk of Modern Slavery in its direct operations.

ii. AMSL

In terms of employment of its workforce, AMSL directly employs its workers and has oversight of labour regulations and management. The majority of AMSL's 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, its workforce profile and its policy framework safeguarding employee rights in the workplace means that there is a low risk of AMSL having caused or contributed to Modern Slavery of workers in our operations.

iii. Dexcom Canada

Given that the business operations for Dexcom Canada are conducted in Canada, we consider the risk of Modern Slavery, including forced labour and child labour, occurring within business operations to be low. In fact, in May 2022, Dexcom became certified as a Great Place to Work® following an independent analysis conducted by Great Place to Work Institute® Canada, a global business which assesses high-performance workplace cultures. Dexcom Canada acknowledges, however, that no sector or industry involved in the production or importation of goods is assumed to be entirely free from the risk of forced labour and child labour.

In assessing the risk of Modern Slavery practices within domestic Canadian operations, Dexcom Canada considered the following factors:

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

As an affiliate company of DexCom, Inc., Dexcom Canada remains bound by Dexcom, Inc.'s global procurement policies and regulations, including the Codes.

In terms of employment terms and conditions, Dexcom Canada and Dexcom Holdings have a direct employment relationship with employees and service providers in Canada, which allows a high degree of control over our internal supply chain operation and labour force regulation and management.

The procurement process for the Dexcom CGM Systems and the services rendered for Dexcom Canada's daily business operations are managed by Dexcom, Inc.'s relevant functions, including Dexcom, Inc.'s Procurement Department and Corporate Compliance. This helps Dexcom Canada and Dexcom Holdings mitigate the prospect of Modern Slavery risk, as they strive to employ stringent measures against Modern Slavery risk within their operations. Based on these assessment criteria, Dexcom Canada identifies a low risk of Modern Slavery in its direct operations.

b. Risks of Modern Slavery in our supply chains

As affiliate companies of DexCom, Inc., each of the Reporting Entities are subject to DexCom, Inc.'s stringent standards in mitigating Modern Slavery risks in our supply chains. As previously mentioned, all the Reporting Entities have adopted DexCom, Inc.'s Codes and policies, which help to identify and prohibit forms of Modern Slavery within operational supply chains. Further, DexCom, Inc., as the exclusive manufacturer of the Dexcom CGM Systems, is itself bound by the Anti-Human Trafficking Policy, Conflict Minerals Policy, and Codes.

DexCom, Inc. also requires its suppliers to comply with its global standards for the procurement of goods and services, endeavouring to mitigate the risk of Modern Slavery in our supply chains.

Direct suppliers of Dexcom must also certify that products and/or services provided comply with laws regarding slavery and human trafficking of the country or countries in which they are doing business. This certification requirement is contained in the Code of Conduct.

The Reporting Entities are committed to monitoring and evaluating risk as well as promoting awareness and identifying potential issues throughout our direct supply chains. Prior to the engagement of a supplier, DexCom, Inc. evaluates the supplier through a risk-based assessment approach. Under certain circumstances, Dexcom may employ a third-party to support in verification activities to identify, assess and manage the risks of Modern Slavery, including human trafficking, in the supply chain.

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

Businesses conducting activities in the United States must comply with the country's ESG and human rights-based laws. As such, we have used our business operations in the United States as applicable as an indicator of likely risks in terms of Modern Slavery practices.

The Reporting Entities operate within the medical technology industry, which is typically dominated by a highly-skilled labour force and stringent regulations. Our Codes and Anti-Human Trafficking Policy provide that our employees and suppliers must strive to ascribe to the utmost compliance with industry practice, workers' health and safety, and employment benefits and wellbeing. We remain cautious over the potential Modern Slavery risk within the production line of the packaging materials for the medical devices manufactured by our supplier.

Based on geographic regions, one of Dexcom's manufacturing sites is located in the United States - a country with strict labour regulations. Dexcom also manufactures products in Malaysia, a country considered by the Global Slavery Index to have an increased prevalence of, and vulnerability to, modern slavery (in comparison with the United States).⁵ The UK has a relatively low prevalence of modern slavery compared to many other countries and has robust mechanisms in place to address and mitigate the risk.

i. AMSL

AMSL manages its procurement process, procuring its own domestic goods and services, while obtaining approval from Dexcom, Inc. prior to engaging with any new supplier of end-products to be sold to customers.

To better understand AMSL's connection to the risks of Modern Slavery in its supply chain, AMSL has had regard to relevant drivers of risk as described earlier in this Report in relation to the MSQ.

Based on factors such as geographic location, inherent industry and product risks and workforce profile of workers in AMSL's supply chain, the following areas within AMSL's supply chains may have a risk of Modern Slavery:

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 using 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.

⁵ <https://cdn.walkfree.org/content/uploads/2023/09/28091623/GSI-Snapshot-Malaysia.pdf>

AMSL expects suppliers to ascribe to the utmost compliance with industry practice, workers health and safety, and employment benefits and wellbeing.

i. Dexcom Canada

Presently, Dexcom Canada has limited visibility beyond tier-1 of its supply chain and operations beyond what is reasonably expected of us to know. The risks of Modern Slavery in the supply chains of the raw material inputs are often long and complex, resulting in limited visibility and heightened risks in circumstances where they are produced or processed in countries with a higher vulnerability to, and prevalence of, Modern Slavery. In addition to the risks associated with raw material inputs, there are also inherent risks of modern slavery in the manufacturing sector, particularly in jurisdictions where the sector is reliant on low skilled migrant labour. However, Dexcom Malaysia operates within the medical technology industry, which is dominated by a highly-skilled labour force.

6. Remediation approach and measures

Within the Reporting Period, the Reporting Entities did not identify any specific incidences of Modern Slavery, including forced labour or child labour in our activities and supply chains. As such, no remediation measures are necessary at this time.

Anyone with concerns regarding actual or suspected violations of DexCom Inc.'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 Code of Conduct.

The Reporting Entities continue to review their existing employment and procurement policies towards promoting a comprehensive policy framework for acknowledging and addressing Modern Slavery risk within our supply chain and operations.

7. Remediation of loss of income

There is nothing to report with respect to remediating any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in the Reporting Entities' activities and supply chains, as no specific measures are necessary at this time.

8. Employee Training and Certification

i. DexCom, Inc. and Dexcom UK

DexCom, Inc. and Dexcom UK requires that its employees certify that they have received, read and understood and will comply with applicable Dexcom policies and procedures, including the Code of Conduct and Business Ethics.

DexCom, Inc. provides training on human trafficking and slavery issues for employees involved in managing our overseas manufacturing facilities and direct supply chain vendors.

In addition, DexCom, Inc. and Dexcom UK provides regular training both online through the Dexcom Learning Center and in-person, as required, regarding the company's policies and procedures including human trafficking and forced labour.

As outlined in the Code of Conduct, measures have been put in place to help workers understand the company's fair labour requirements, including anti-retaliation measures for workers who lodge grievances or report violations.

ii. Dexcom Canada

Within the Reporting Period, Dexcom Canada's employees received training on the Code of Conduct, which addresses matters related to forced labour and child labour. Code of Conduct training is required annually for all Dexcom's employees.

Dexcom Canada is planning to implement mandatory training on the Anti-Human Trafficking Policy to all Dexcom Canada employees.

9. Assessing Effectiveness and Compliance

i. Dexcom, Inc. and Dexcom UK

Dexcom upholds accountability standards and procedures for employees or vendors who fail to comply with the company's relevant policies and procedures. When necessary, Dexcom will perform investigations and audits to verify that business is being conducted in compliance with company policy and law. All Dexcom employees and third parties through whom Dexcom conducts business are required to fully and promptly cooperate with Dexcom's internal and external auditors and investigators, and must respond fully and truthfully to their questions, requests for information, and documents.

Any failure by an employee to fully cooperate, or any action to hinder an investigation or audit, may be grounds for disciplinary action, up to and including termination, subject to applicable law.

ii. AMSL

AMSL seeks to assess the effectiveness of its measures to mitigate modern slavery risks by setting goals each year and tracking progress during the following reporting periods. The goals for 2024, as set out in AMSL's 2023 modern slavery statement, were linked to the following objectives: identifying the supplier population for MSQ completion, increasing completion rates of the MSQ, increasing awareness of modern slavery red flags within AMSL's workforce and supporting employees with a procurement function on how to maximise the utility of the MSQ.

AMSL continued to work with its external subject matter experts to review and assess the results of the 2024 MSQ. During the Reporting Period, AMSL in collaboration with its external subject matter experts, gave a webinar presentation to the APAC Medical Device Industry Association on the topic of modern slavery in the broader ESG governance spectrum. The audience at this webinar included legal and compliance personnel in the medical device industry, including AMSL staff.

During the next reporting period, AMSL will seek to further progress the objectives set out above.

iii. Dexcom Canada

Dexcom Canada has not taken any actions in the Reporting Period to assess its effectiveness in preventing and reducing risks of forced labour and child labour in our activities and supply chains.

10. Approval and attestation

i. Canada - Dexcom Canada and Dexcom (UK) Intermediate Holdings Limited

This Report was approved on May 21, 2025 pursuant to subparagraph 11(4)(b)(i) of the Canadian Act by the boards of directors of Dexcom Canada, Co. and Dexcom (UK) Intermediate Holdings Limited for the financial year ended December 31, 2024.

I make this attestation in my capacity as a director of the board of Dexcom Canada, Co. for and on behalf of the board of Dexcom Canada, Co.

DocuSigned by:
Michael Brown
Per: Michael Brown
Full Name: Michael Brown
Title: Chief Legal officer
Date: 5/28/2025

I have authority to bind Dexcom Canada, Co.

I make this attestation in my capacity as a director of the board of Dexcom (UK) Intermediate Holdings Ltd. for and on behalf of the board of Dexcom (UK) Intermediate Holdings Limited

DocuSigned by:
Michael Brown
Per: Michael Brown
Full Name: Michael Brown
Title: Chief Legal officer
Date: 5/28/2025

I have authority to bind Dexcom (UK) Intermediate Holdings Ltd.

ii. Australia - AMSL

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.

DocuSigned by:
Michael Brown
Full Name: Michael Brown
Title: Chief Legal officer
Date: 5/28/2025

iii. United States - DexCom, Inc. and Dexcom UK

In accordance with the California Transparency in Supply Chains Act of 2010 (SB 657), this Report was approved on May 21, 2025 by the boards of Dexcom, Inc. and Dexcom (UK) Limited.

DocuSigned by:
Michael Brown
Full Name: Michael Brown
Title: Chief Legal officer
Dexcom, Inc.
Date: 5/28/2025

DocuSigned by:
Michael Brown
Full Name: Michael Brown

Full Name: Michael Brown
Title: Chief Legal Officer
Dexcom (UK) Limited
Date: 5/28/2025

iv. United Kingdom - DexCom, Inc. and Dexcom UK

In accordance with section 54 of the U.K. Modern Slavery Act 2015, this Report was approved on May 21, 2025 by the boards of DexCom, Inc. and Dexcom (UK) Limited.

DocuSigned by:
Michael Brown
CF378CA6849A4ED
Full Name: Michael Brown
Title: Chief Legal Officer
DexCom, Inc.
Date: 5/28/2025

DocuSigned by:
Michael Brown
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AMSL Statement Annexure

<i>Modern Slavery Act 2018 (Cth) Reporting Criterion</i>	Page number
1 & 2. Identify the reporting entity and describe its structure, operations and supply chains	2
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	8
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, 12
5. Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	13