

Dexcom Statement on Compliance with the U.K. Modern Day Slavery Act

December 1, 2020

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and applies to the following legal entities:

DexCom International Limited
Dexcom (UK) Limited
Dexcom (UK) Intermediate Holdings Ltd
Dexcom (UK) Distribution Limited
DexCom Operating Ltd.

At Dexcom, we operate with the highest standards of ethics and integrity. Child labor and illegal, abusive or forced labor, slavery and human trafficking have no place in our operations or the operations of our suppliers or other third-party vendors of Dexcom. Dexcom will not tolerate or condone human trafficking or slavery in any part of our global organization.

Section 54 of the U.K. Modern Slavery Act 2015 is designed to provide consumers with information regarding manufacturers' and retailers' efforts to address the issue of slavery and human trafficking in the supply chain. These disclosures allow businesses and consumer to make more informed decisions regarding the products they choose to purchase and the companies with whom they choose to conduct business.

Headquartered in Edinburgh and operating globally, Dexcom International Limited is committed to conducting business only with suppliers who adhere to the highest ethical standards and comply with all applicable laws and regulations everywhere we do business. Dexcom has undertaken actions to ensure that the products and services provided to Dexcom meet this commitment.

Verification

Dexcom is committed to monitoring and evaluating risk as well as promoting awareness and identifying potential issues throughout its direct supply chain. Prior to the engagement of a supplier, Dexcom 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 human trafficking in the supply chain.

Certification

Dexcom requires that its employees certify that they have received, read, understood and will comply with applicable Dexcom policies and procedures, including Dexcom's [Code of Conduct and Business Ethics](#).

Direct suppliers 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.

Internal Accountability

Dexcom upholds accountability standards and procedures for any employees or vendors who fail to comply with the company's relevant policies and procedures. Dexcom also engages in monitoring of third parties. As outlined in our [Code of Conduct and Business Ethics](#), measures have been put in place to help workers understand the company's fair labor requirements, including anti-retaliation measures for workers who lodge grievances or report violations.

The company maintains a [Compliance Helpline](#), which is hosted by a third party hotline provider, EthicsPoint, to address any questions, concerns, and/or report any concerns regarding the company's business practices.

In addition to the Code of Conduct and Business Ethics, Dexcom operates a number of policies, including an Anti-Human Trafficking Policy and Supplier Code of Conduct, that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations

Training

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

Dexcom 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 labor.

Audit and Investigation

Dexcom will perform investigations and audits when necessary 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.

In accordance with Section 54 of the U.K. Modern Slavery Act 2015, this Statement was approved on December 1, 2020 by the boards of Dexcom International Limited and Dexcom (UK) Limited.

DocuSigned by:

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Jereme Sylvain
Director
Dexcom International Limited
Date: December 1, 2020

DocuSigned by:

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Patrick Murphy
Director
Dexcom (UK) Limited
December 1, 2020

DocuSigned by:

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