Anti-Human Trafficking Policy
## Change Revision History

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<th>Rev. No.</th>
<th>Change Order No.</th>
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<tr>
<td>001</td>
<td>CORPCO-00489</td>
<td>Initial release</td>
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<td>002</td>
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1.0 PURPOSE

1.1 At Dexcom, we operate with the highest standards of ethics and integrity. Child labor and illegal, abusive or forced labor have no place in our operations and the operations of our suppliers or other third-party vendors of Dexcom.

1.2 Dexcom will not tolerate or condone human trafficking or slavery in any part of our global organization. This Policy is consistent with Dexcom’s Code of Conduct and Business Ethics and Supplier Code of Conduct and strives to protect and advance human dignity and human rights in our global business practices.

2.0 SCOPE

2.1 This Policy applies to all personnel employed by or engaged to provide services to Dexcom, including, but not limited to, Dexcom’s officers, directors, and employees (“Employees”), as well as consultants, contract workers, and temporary workers (including agency workers, staff, independent contractors, agents, and other third-party labor agencies) (collectively, “Personnel”).

2.2 This Policy also applies to suppliers, vendors, and other third-party providers of goods and services to any Dexcom business, and to their direct and indirect affiliates, including parent companies, subsidiaries, and sister companies (collectively, “Suppliers”).

3.0 REFERENCES

3.1 Policies

3.1.1 Dexcom’s Code of Conduct and Business Ethics

3.1.2 Dexcom’s Anti-Bribery and Anti-Corruption Policy, DCP-000101

3.1.3 Dexcom’s Supplier Code of Conduct

3.2 Laws and Regulations

3.2.1 California Transparency in Supply Chains Act of 2010 (SB 657)

3.2.2 UK Modern Slavery Act 2015

3.2.3 Philippines Anti-Trafficking Persons Act (2003)

3.2.4 Malaysia Anti-Trafficking Law (2007)

3.2.5 Thailand Anti-Trafficking in Persons Act, B.E. 2551 (2008)

3.2.6 Indonesia Anti-Trafficking Law (2007)

3.2.7 Applicable local laws and regulations, including labor laws as well as those pertaining to human trafficking and slavery
4.0 **DEFINITIONS**

N/A

5.0 **YOUR RESPONSIBILITIES**

5.1 Every Dexcom Employee, Personnel, and Supplier is responsible for reading, understanding, and complying with this Policy and for complying with all applicable laws and regulations related to child labor, human trafficking, and forced labor.

5.2 Dexcom managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this Policy and complete any certification or training required of them.

6.0 **POLICY GUIDELINES**

6.1 Dexcom prohibits trafficking in persons and slavery. Dexcom Employees, Personnel, Suppliers, and others through whom Dexcom conducts business must not engage in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities:

6.1.1 Engaging in any form of human trafficking;

6.1.2 Procuring commercial sex acts;

6.1.3 Using forced labor in the performance of any work;

6.1.4 Destroying, concealing, confiscating, or otherwise denying access to an individual’s identity or immigration documents, such as passports or drivers’ licenses, regardless of issuing authority;

6.1.5 Using misleading or fraudulent practices during the recruitment of candidates or offering of employment or contract positions; such as failing to disclose, in a format and language accessible to the potential candidate, basic information or making material misrepresentations during the recruitment of candidates regarding the key terms and conditions, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (where provided by Dexcom), any significant cost to be charged to the candidate, and, if applicable, the hazardous nature of the work;

6.1.6 Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;

6.1.7 Charging applicants/candidates recruitment fees;

6.1.8 If required by law or contract, failing to provide or arrange housing that meets the host country housing and safety standards; or

6.1.9 If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing.
7.0 DIRECT SUPPLY CHAIN

7.1 Dexcom is committed to maintaining and improving its systems and processes, and to eradicating any human trafficking and slavery within its direct supply chain. This standard requires that Dexcom’s Suppliers observe applicable laws and regulations and conduct business in an ethical and responsible manner consistent with Dexcom’s policies, including this Policy and the Supplier Code of Conduct. Dexcom’s commitment includes:

7.1.1 Evaluating and addressing risk: Dexcom is committed to monitoring and evaluating risk as well as promoting awareness and identifying potential issues throughout its direct supply chain.

7.1.2 Obtaining certifications: Dexcom requires that its Suppliers certify from time to time that they have received, read, understood, and will comply with applicable Dexcom policies, including this Policy and the Supplier Code of Conduct, and will comply with all applicable labor laws.

7.1.3 Holding violators accountable: Dexcom upholds accountability standards and procedures for any Suppliers who fail to comply with this Policy.

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

8.0 AUDITS AND INVESTIGATIONS

8.1 Dexcom reserves the right to verify compliance with this Policy and perform investigations and audits to verify that business is being conducted by Employees, Personnel, and Suppliers in compliance with this Policy.

8.2 All Dexcom Employees, Personnel, and Suppliers through whom Dexcom conducts business are required to fully and promptly cooperate with Dexcom’s internal and external auditors and investigators; must respond fully and truthfully to their questions, requests for information, and documents; and may not take any action to hinder any investigation or audit.

9.0 ACCOUNTABILITY AND CORRECTIVE ACTION

9.1 If Dexcom becomes aware of any actions or conditions by any Employee or Personnel not in compliance with this Policy, then Dexcom may impose disciplinary action on such Employee or Personnel, up to and including termination, subject to applicable law.

9.2 If Dexcom becomes aware of any actions or conditions by any Supplier not in compliance with this Policy, then Dexcom may require Supplier to take immediate corrective action as Dexcom may deem appropriate. Further, any violation of or non-compliance with this Policy is a material breach of the Supplier’s agreement(s) with Dexcom.
10.0 CONTACT DETAILS

10.1 If you have any questions or concerns relating to this Policy, consult the Dexcom Compliance Department or a manager in the Dexcom Procurement Department.

10.2 If you are aware of any potential violations of safety and health laws, regulations, policies, or procedures, please contact the Environmental Health and Safety Department, the Legal Department, and/or the Compliance Department.

10.3 If you would like to place an anonymous report in confidence, please use our Compliance Helpline, which is hosted by a third-party provider, EthicsPoint: https://secure.ethicspoint.com/domain/media/en/gui/48920/index.html. Employees who fail to report actual or suspected misconduct may be deemed in violation of this Policy where not prohibited by applicable law.

10.4 Dexcom will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation.