

# MODERN SLAVERY REPORT 2023

## 1. Introduction

In accordance with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* ("Act"), this document represents the first Modern Slavery Report ("Report") submitted jointly by Dexcom Canada, Co. and Dexcom (UK) Intermediate Holdings Ltd. (collectively the "Reporting Entities" or "we" or "our"). This Report relates to the financial year ended December 31, 2023 ("Reporting Period"). Dexcom (UK) Intermediate Holdings Ltd. also reports pursuant to the United Kingdom's *Modern Slavery Act 2015*.

The purpose of this Report is to identify and evaluate the current modern slavery risk in the Reporting Entities' operations and supply chains and outline their approach to manage any current and future risks.

## 2. Steps Taken to Prevent and Reduce the Risks of Forced Labour and Child Labour

In general terms, during the Reporting Period, the Reporting Entities implemented revisions to the policies and procedures used for specifically addressing forced labour and child labour, and for identifying and mitigating the use of forced and child labour in our activities and supply chains. Specifically, an Anti-Human Trafficking Policy, Supplier Code of Conduct and Code of Conduct and Business Ethics were in use. Collectively, these documents address and consider forced labour and child labour practices, and prohibitions related to same.

## 3. Structure, Activities and Supply Chains

### a. Structure

Dexcom Canada, Co. ("Dexcom") is a corporation incorporated under the laws of Nova Scotia, Canada, conducting business in Canada and primarily operating out of British Columbia. Dexcom is a fully owned subsidiary of Dexcom (UK) Intermediate Holdings Ltd. ("Dexcom UK"). Dexcom UK is a private limited company existing under the laws of England and Wales. Dexcom UK is a holding company with no operations or employees.

The Reporting Entities are affiliate companies of Dexcom, Inc., the United States-based global head responsible for developing, manufacturing, producing, and distributing Continuous Glucose Monitoring systems worldwide.

### b. Activities

Dexcom distributes Continuous Glucose Monitoring ("CGM") devices across Canada, including the Dexcom G6 CGM System and Dexcom G7 CGM System (collectively the "Dexcom CGM Systems"). The Dexcom CGM Systems are designed primarily for people living with type 1 or type 2 diabetes on intensive insulin therapy.

CGM is a method of tracking glucose levels throughout the day and night in real time. Continuous data can help people living with type 1 or type 2 diabetes to proactively manage glucose highs and lows, while real time alerts on a display device that are transmitted via Bluetooth can give added insight into different factors that may affect glucose levels in any moment.

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

There are four main functional departments that make up Dexcom'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 and Education. As a collaborative team, all of Dexcom's departments enhance its operational efficiency and service quality.

### **c. Supply Chain**

The Dexcom CGM Systems are manufactured exclusively in San Diego, California and Mesa, Arizona in the United States by Dexcom, Inc. Dexcom, Inc. is the sole manufacturer and supplier of finished products to Dexcom. Finished products are imported directly into Ontario, Canada by Dexcom, 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.

Materials used to produce Dexcom 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.

### **4. Policies and due diligence processes in relation to forced labour and child labour**

The Reporting Entities recognise that modern slavery may occur in many forms in Canada 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 our operations and supply chains in Canada and internationally.

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 laws and regulations for medical technology products.

#### **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 identifying and strictly prohibiting forced labour, indentured servitude, and commercial sex labour within all components of our supply chain. The Anti-Human Trafficking Policy 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 active 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 directly control and regulate compliance and regulatory divisions through Dexcom, Inc.'s Supplier Code of Conduct (“**Supplier Code**”) and Code of Conduct and Business Ethics (“**Code of Conduct**”) (collectively “**Codes**”). Both Codes are administered by Dexcom, Inc. and available via Dexcom, Inc.'s global website under the Governance section.

The Codes recognise modern slavery concepts in the regulation of supply chains, 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. The Dexcom Code of Conduct makes clear references to the adherence of all applicable domestic laws and regulations, which includes the Act.

The Supplier Code is extensive and 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. 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. Dexcom Inc. issues an annual Sustainability Report. In ensuring compliance among our suppliers for these range of issues, the Reporting Entities maintain quality control and other audit standards, providing the suppliers with detailed expectations regarding procurement policies, in line with our ethics and compliance program.

## **c. Commitment to Compliance, Privacy and Security**

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 global website under the Terms & Policies, [Trust Center section](#).

## **d. Statement on Human Rights**

In early 2024, the Reporting Entities adopted Dexcom, Inc.'s Statement on Human Rights including its key principles consistent with its Anti-Human Trafficking Policy and Code of Conduct prohibiting 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](#).

## **5. Risks of forced labour and child labour 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, which the Reporting Entities acknowledge.

### **a. Forced labour and child labour risks in our business operations**

Given that the business operations for Dexcom are conducted in Canada, we consider the risk of 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. The Reporting Entities acknowledge, 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, the Reporting Entities considered the following factors:

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

As affiliate companies of Dexcom, Inc., the Reporting Entities remain bound by Dexcom, Inc.'s global procurement policies and regulations, including the Codes.

In terms of employment terms and conditions, the Reporting Entities 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 the Reporting Entities' daily business operations are managed by Dexcom, Inc.'s relevant functions, including Dexcom, Inc.'s Procurement Department and Corporate Compliance. This helps the Reporting Entities to mitigate the prospect of modern slavery risk, as we strive to employ stringent measures against modern slavery risk within our operations. Based on these assessment criteria, we identify a low risk of modern slavery in our direct operations.

### **b. Forced labour and child labour risks in our supply chain**

As affiliate companies of Dexcom, Inc., the Reporting Entities are subject to Dexcom, Inc.'s stringent standards in keeping their supply chains free of modern slavery risks and occurrences. As previously mentioned, the Reporting Entities have adopted Dexcom, Inc.'s Codes and Anti-Human Trafficking policy, which help to identify and prohibit forms of modern slavery within our operational supply chain. Further, Dexcom, Inc. as the exclusive manufacturer of the Dexcom CGM Systems is itself bound by the Anti-Human Trafficking Policy and Codes.

As Dexcom, Inc. 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 Canadian modern slavery legislation.

Dexcom, Inc. 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, 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.

It is increasingly the case that businesses conducting activities in the United States must comply with the countries' significant ESG and human rights-based laws and regulatory requirements. As such, we have used our business operations in the United States as an indicator of likely risks in terms of modern slavery practices.

Based on geographic regions, Dexcom's exclusive manufacturer and supplier of the Dexcom CGM Systems is located in the United States - a country with strict labour regulations and some form of modern slavery legislation. Further, the Reporting Entities operate within the medical technology industry, which is 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. 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 manufactured by our supplier.

Presently, the Reporting Entities do not have visibility into the suppliers' supply chain and operations beyond what is reasonably expected of us to know. Nevertheless, as the manufacturer of the Dexcom CGM Systems is located within a geographical area with strong labour regulations, we are confident that goods manufactured for Dexcom have significantly lower risk of modern slavery than could otherwise be the case if manufactured elsewhere.

## **6. Remediation measures**

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

The Reporting Entities continue to review their existing employment and procurement policies to ensure that we have a comprehensive policy framework to acknowledge and address 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**

Within the Reporting Period, Dexcom'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 of Dexcom's employees.

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

## 9. Assessing Effectiveness

The Reporting Entities have not taken any actions in the Reporting Period to assess our effectiveness in preventing and reducing risks of forced labour and child labour in our activities and supply chains.

## 10. Approval and attestation

This Report was approved by the boards of directors of Dexcom Canada, Co. and Dexcom (UK) Intermediate Holdings Ltd. for the financial year ended December 31, 2023, pursuant to paragraph 11(4)(b)(i) of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the Report for the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I make the above 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.

Per: DocuSigned by:  
**Michael Brown**  
CF378CA6849A4F0...  
Full Name: Michael J. Brown  
Title: Director  
Date: May 31, 2024

*I have authority to bind Dexcom Canada, Co.*

I make the above 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 Ltd.

Per: DocuSigned by:  
**Michael Brown**  
CF378CA6849A4F0...  
Full Name: Michael J. Brown  
Title: Director  
Date: May 31, 2024

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