dexcom

Dexcom, Inc. Code of Conduct and Business Ethics

January 2026

Our Mission, Our Promise

A Message from our CEO

At Dexcom, our mission is more than words—it's a daily commitment to empower people to take control of health and live fuller, healthier lives. Every innovation, every conversation, and every decision we make is rooted in listening to the real needs of patients, caregivers, and healthcare providers. This is how we deliver solutions that are not just best in class, but truly life-changing.

Our journey has made Dexcom a global leader in biosensing technology. That leadership is built on trust—trust from our customers, our partners, and our communities. It's a trust we earn every day by acting with integrity, producing high-quality products, making principled decisions, and holding ourselves to the highest ethical standards.

The Dexcom Code of Conduct and Business Ethics isn't just a document—it's our collective guide and ensures we do business the right way. It reflects our core values and sets the expectations for how we work together, how we serve our customers, and how we shape not only the future of diabetes care, but the incredible opportunity that we have to transform metabolic health. Whether you are a Dexcom employee, partner, or customer, I encourage you to engage with the Code, use it as a resource, and lean on it as a guide for whenever you face tough choices.

Thank you for your partnership toward our mission, for your integrity, and for the positive impact you make—one patient, one family, one community at a time. Together, we're not just advancing technology; we're transforming lives.

Jake Leach

President & CEO

dexcom

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Introduction

1. Our Core Values and The Code
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Our Core Values and The Code

At Dexcom, we strive for a culture that unlocks the potential of what we can achieve together: from employees' best work to the impact we have on people who use our products. Our Values serve as the cornerstone of our culture and drive our behaviors.

Each of us is responsible for upholding Dexcom's great reputation and committing to Dexcom's mission **to empower people to take control of health**. This mission is underpinned by the core values that drive our day-to-day operations:

think big
Unleashing innovation to improve healthcare and change lives

listen
Understanding the needs of everyone we serve

be dependable
Keeping our promises and owning the results

serve with integrity
Doing what's right for our employees, our customers and our communities

This Code applies to every person conducting business for Dexcom worldwide. It is intended as a guide and is meant to supplement – not replace – existing policies and procedures.

Obligations to the Code

Tone at the Top

Dexcom expects its leaders to help foster a strong commitment to this Code and to promote a culture of fairness, honesty, integrity, and accountability. We also must ensure that our suppliers, agents, and other third parties hold themselves to the same high standards.

Speaking Up and Asking Questions

All Employees are expected to uphold Dexcom's mission and values and commitment to this Code. If you need help understanding this Code, or how it applies in any given situation, do not hesitate to contact your supervisor or Dexcom's Compliance Department.

It is your obligation to speak up and alert the Company to possible violations of this Code by others. We are committed to fostering an environment where open and honest communication is the expectation, not the exception. If you are unsure if a situation could be a violation of this code, reach out and ask questions.

Resources and Reporting Concerns

If you have any questions about the Code or suspect a misconduct, there are many resources available to you.

Open Dialogue

We encourage Employees to keep open lines of communication with their supervisor and/or department management.

The Compliance Department

Reach out to Compliance to report concerns and ask questions. The Compliance intranet site provides additional information, including a global team directory, links to the Compliance Helpline, current policies, and additional resources.

Compliance Helpline

Dexcom also has a Compliance Helpline, hosted by NAVEX, a third-party helpline provider. Reports through the Helpline may remain anonymous. NAVEX gives us the ability to communicate within the system while maintaining anonymity.

Mobile:
Click Here

Web:
Click Here

Phone:
Dial **(866) 384-4277** or click the website above for local numbers.

Other Resources

Many other internal departments have policies and procedures in place to ensure adherence to the Code. These include Human Resources, Information Technology/Security, Environmental Health & Safety, Legal, Quality, Finance, and Procurement.

Please reach out to these departments with any questions or concerns you may have.

Confidentiality and Investigations

Internal Investigations

All reports of suspected ethical or Code violations or unlawful activity will be reviewed and promptly investigated with the highest degree of confidentiality possible under the circumstances. Employees have an obligation to cooperate with investigations.

If an investigation indicates that a violation has occurred, Dexcom may take appropriate disciplinary action, up to and including termination of employment.

Retaliation against someone who seeks advice, raises a concern, reports misconduct, or provides information in an investigation is strictly prohibited. If you believe that you or another Employee has been retaliated against, you should contact Compliance immediately.

Government Investigations

Dexcom cooperates fully with any investigations by the governments and regulatory authorities in countries where we conduct our business. Any questions or inquiries related to these types of investigations must be immediately directed to Legal and/or Compliance.

Q: What are examples of retaliation?

A: Some examples include denial of benefits, termination, demotion, suspension, threats, and/or harassment or discrimination.

Find more on the Compliance intranet site! Check out the Internal and Government Investigation, Speak-Up, and Anti-Retaliation Policy for more information.

How we conduct our business

1. Healthcare Laws and Regulatory Requirements
2. Interactions with Third Parties
3. Meals, Gifts, and Entertainment
4. Fair Business Dealings
5. Global Antitrust, Competition, and Trade Controls Laws
6. Clinical, Regulatory Affairs, and Quality

Healthcare Laws and Regulatory Requirements

Dexcom is subject to many laws and regulations designed to protect patients and consumers, improve the quality of medical devices and healthcare services, and help eliminate fraud and improper influence on medical judgment.

Our success depends upon every Employee's commitment to following these laws and regulations. While you are not expected to have complete mastery of all laws and regulations, you are expected to raise questions, identify issues, and consult with others to determine the appropriate course of action.

Because Dexcom is a global company, the laws and regulatory requirements of one country may apply to activities in another country. If local laws and regulatory requirements differ from our Company policy, the stricter requirements generally apply.

Did you know?

The Dexcom Compliance Team is global, with representatives in North America, EMEA, and APAC. So, no matter where you work, someone is close by to help you navigate these complex requirements.

Interactions with Third Parties

Dexcom relies on many third parties to achieve our business goals. We are committed to acting with the highest standards of integrity and honesty when interacting with patients and patient groups, healthcare professionals, and the scientific community.

Interacting with Patients and Patient Groups

At Dexcom, we listen to and exchange ideas with patients and patient groups to help us better understand how individuals live with diabetes and what they expect from their medical devices and healthcare providers. Patient inputs are vital in helping us develop better solutions for our patients.

Guiding Principles

- All interactions with patients must be respectful, built on trust, and executed in a manner consistent with ethical requirements, applicable laws and regulations, industry standards and codes, and Dexcom's core values.
- When interacting with patients, we should never make a patient feel like they are being marketed to.

Interactions with patients and patient groups are subject to complex and evolving legal, regulatory and industry requirements. Compliance should always be consulted to ensure these interactions are conducted appropriately.

Q: Can I support a patient organization on my own, such as through monetary donations or volunteer hours?

A: As long as you make it clear that you are not acting on behalf of Dexcom, personal support, including monetary donations and volunteer support, of charitable organizations is permissible.

Find more on the Compliance intranet site! Check out the Patient Interactions Policy for more information.

Interacting with Healthcare Professionals and the Scientific Community

We interact with healthcare professionals ("HCPs") and the scientific community in many ways, including:

- **Education.** Providing fair and balanced information about our products and their appropriate use, benefits, and risks.
- **Research.** Supporting medical or scientific meetings, events, research, and other activities.
- **Compensation-for-Service Agreements.** Entering agreements with external experts to perform a meaningful service or activity in medical or scientific-related fields for legitimate needs, such as conducting studies, participating in scientific meetings, and providing consulting services.
- **Product Feedback.** Obtaining feedback and advice regarding the clinical use of our products, which allows us to develop enhancements.

We select HCP experts using objective criteria based on defined business needs – never on the volume or value of the HCP's past, present, or anticipated business.

Q: If I want to engage an external expert, how do I compensate them?

A: We must compensate HCPs consistent with the fair market value of the services. Compliance can assist in determining the appropriate fair market value rate.

Guiding Principles

- HCPs have a primary duty to their patients. Our interactions with HCPs must advance patient care and support the ethical and compassionate practice of medicine with integrity.
- Interactions with HCPs and the scientific community are subject to many complex and evolving laws around the globe, including anti-kickback laws. We comply with these laws by ensuring that we never improperly influence HCPs in their clinical decision making.

Q: What are anti-kickback laws?

A: These are laws that typically prohibit offering anything of value that is intended to influence a healthcare professional's decision to recommend, prescribe, endorse, or purchase a healthcare product.

Find more on the Compliance intranet site! Regional HCP Interactions Policies account for the specific laws and regulatory requirements.

Anti-Bribery and Anti-Corruption

Dexcom prohibits its Employees and anyone else acting on our behalf from offering, giving, requesting, accepting, or receiving bribes. Most countries where we conduct our business have laws that forbid providing or offering payments or bribes to government officials to improperly influence regulatory treatment, business retention, or improper business advantages.

Did you know?

In many countries, HCPs, hospital personnel, researchers, members of academia, and scientists are often employees of public or state-owned institutions and can therefore be considered government officials.

Examples of such laws include the US Foreign Corrupt Practices Act ("FCPA"), the Canada Corruption of Foreign Public Officials Act, and the UK Bribery Act.

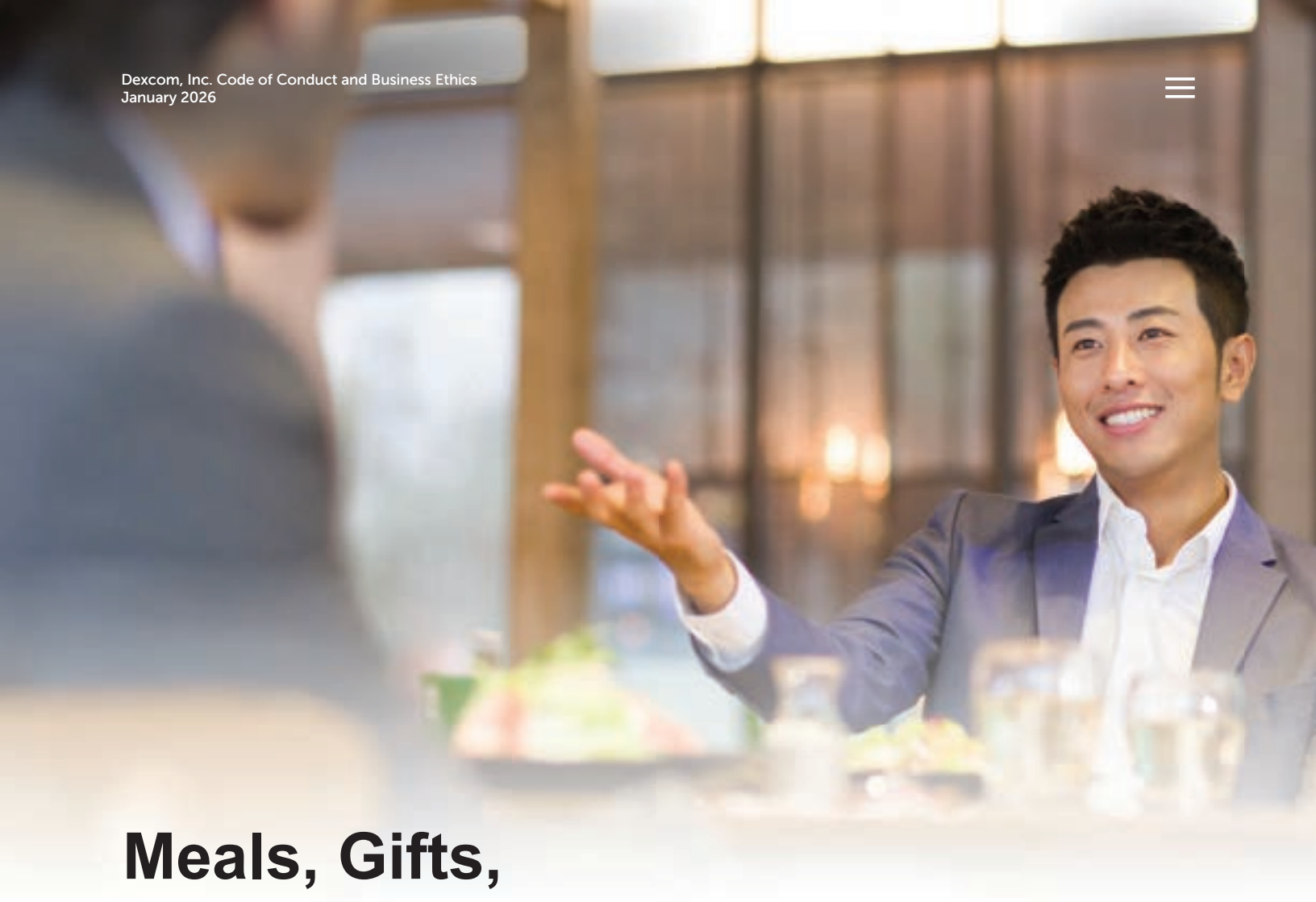
Guiding Principles

- Dexcom, its subsidiaries, and all third parties acting on our behalf must comply with all local and international anti-bribery and anti-corruption laws.
- We are particularly sensitive to bribery and corruption issues because governments are often both the regulators of our products and our major customers.
- Dexcom also prohibits "commercial bribery" – giving, offering, requesting, accepting, or receiving something of value to secure an improper business advantage.

Q: I was informed that one of our distributors has invited several HCPs who work at a government hospital and prescribe our products to a weekend ski trip at a resort. Is this appropriate, since the invitation came from our distributor, and not from Dexcom?

A: No. Distributors and other third parties acting on our behalf may not engage in activities that would be prohibited if performed by a Dexcom employee. You should immediately contact your manager, Legal, or Compliance.

Find more on the Compliance intranet site! Check out the Anti-Bribery and Anti-Corruption Policy and Distributor Code of Conduct for more information.



Meals, Gifts, and Entertainment

Building strong relationships with customers, distributors, and suppliers is essential to Dexcom's business, and socializing with these individuals and groups is an integral part of building those relationships.

However, good judgment should be exercised when providing or accepting business meals, entertainment, or gifts. All such conduct must be compliant with applicable laws, regulations, and internal Dexcom policies while remaining consistent with customary and prudent business practices.

Guiding Principles

Individual circumstances may differ, but generally:

- Meals, gifts, and entertainment should not be given or accepted (whether by a Dexcom employee, customer, distributor, or supplier) if doing so could be perceived as creating an obligation to act other than in the best interests of the recipient's employer or otherwise taint the objectivity of the individual's involvement.
- While some policies and local customs may allow the provision of gifts, providing gifts (and entertainment) to HCPs is strictly prohibited.
- These principles apply to Dexcom's transactions globally, even if they conflict with local custom.

Each region where Dexcom conducts business has established Travel and Expense and HCP Interactions Policies that further outline the guidelines for meals, gifts, and entertainment.

Fair Business Dealings

Dexcom strives to compete vigorously in the marketplace through superior business performance, quality, service, and price, and not through unethical or illegal business practices.

Guiding Principles

- We are all expected to deal fairly and honestly with Dexcom customers, suppliers, employees, and any others we engage with while performing work for Dexcom.
- Making false or misleading statements about Dexcom competitors is prohibited. This is inconsistent with our reputation for integrity and harmful to our business.
- Dexcom suppliers must be selected based exclusively on objective considerations such as quality, cost, availability, service, and reputation, and not on the receipt of special favors or bribes.

Dexcom does not participate in unfair business practices.

Some examples of unfair business practices:

- Misuse of confidential information
- Misrepresentation of information
- Obtaining trade secrets or proprietary information in an improper manner
- Disclosure of confidential information of other companies.

Sales and marketing activities may implicate national or local fraud and abuse laws. Dexcom has adopted policies and procedures addressing sales and marketing activities, implemented tracking mechanisms for remuneration provided to referral sources, and developed appropriate training for sales staff with respect to applicable laws.

Global Antitrust, Competition, and Trade Controls Laws

Global Antitrust, Competition, and Trade laws are often complex and can change quickly as governments adjust to new political and security issues.

Antitrust and Competition Laws promote fair competition and protect consumers from unfair business practices.

Dexcom complies with global trade control laws and regulations. We respect embargoes, trade sanctions, and import/export restrictions applicable to our business activities.

Guiding Principles

- Dexcom complies with all applicable global antitrust, competition, and trade controls laws.
- Some kinds of information, including pricing, production, and inventory, should never be exchanged with competitors, regardless of how innocent or casual the exchange may seem.
- Even where no formal arrangement exists, merely exchanging information can create the appearance of an improper arrangement.

Q: What are the consequences of noncompliance with these laws?

A: Violations of these laws can result in severe consequences for Dexcom, including:

- Long and costly investigations and lawsuits
- Substantial fines or damages
- Adverse publicity
- Supply chain issues

These laws are very complex. If you are unsure about a potential business or commercial venture, seek guidance from Legal and Compliance.

Clinical, Regulatory Affairs, and Quality

The products designed, manufactured, and sold by Dexcom are regulated by government authorities throughout the world.

To ensure safety, product quality, and regulatory compliance, Dexcom adheres to regulatory and generally accepted good manufacturing, good clinical, and good laboratory practices in addition to our internal quality system requirements.

Dexcom is dedicated to ensuring that our products consistently meet or exceed the quality standards required in the medical device industry. We uphold the highest standards of patient safety and well-being.

Guiding Principles

- Dexcom Employees must be aware of and comply with the laws and regulations that are relevant to their job duties.
- We are committed to timely and accurate reporting to regulators and to maintaining open, honest, and professional relationships with regulators.
- Clinical trials must be conducted in accordance with regulatory and ethical standards.
- Every Employee at Dexcom must report to Quality any concerns or issues relating to compromises in quality or patient safety in a timely manner.

Q: I was at a gathering with friends and family and an acquaintance with whom I was speaking mentioned that they are a Dexcom user and have been experiencing issues with their sensor. Does this need to be reported?

A: Yes, regardless of how you become aware of quality or patient safety issues, whether during work or in your personal life, you must report these to Quality.

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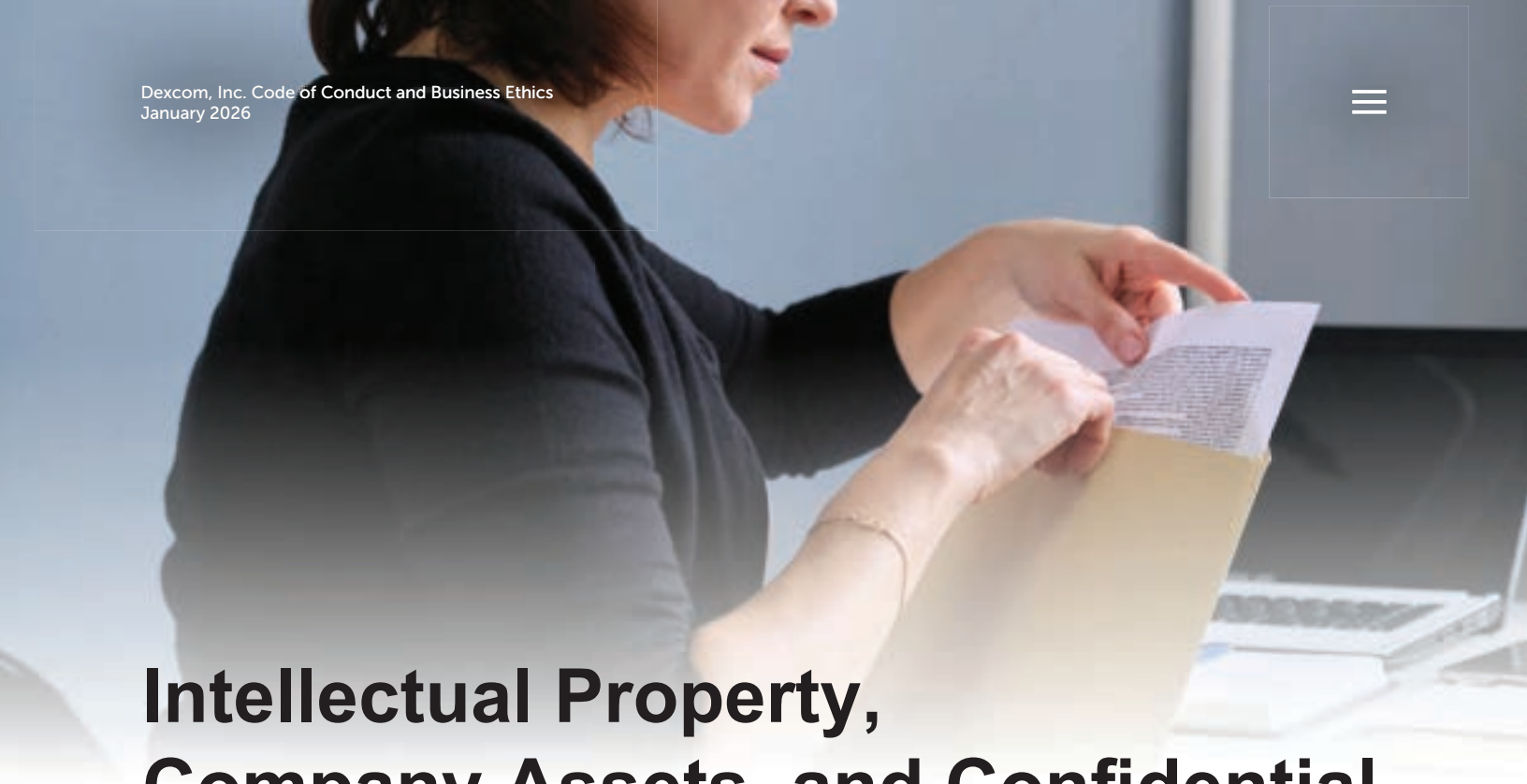
Safeguarding our Company

1. Intellectual Property, Company Assets, and Confidential Business Information
2. Accuracy of Corporate Books and Records
3. Conflicts of Interest
4. Insider Information and Trading
5. Media Contacts and Public Communications
6. Social Media
7. Privacy and Personal Data



Intellectual Property, Company Assets, and Confidential Business Information

Intellectual Property includes copyrights, patents, trademarks, product and package designs, brand names and logos, research and development, inventions, and trade secrets.

Company Property includes computers and computer equipment, buildings, furniture and furnishings, office supplies, and products.

At Dexcom, our intellectual property and confidential business information are key assets that we must secure and protect.

It is the obligation of every Employee to take precautions to protect Dexcom's intellectual property and confidential business information.

Guiding Principles

- Do not share any confidential information regarding Dexcom or our customers, distributors, suppliers, service providers, business partners, or other third parties with anyone who has not been authorized to receive it.
- Keep documents and Dexcom property secure.
- Communicate privately, avoid having discussions of sensitive matters or confidential information in public places, including those online.
- Presume that all Dexcom communications (email, voicemail, etc.) are confidential and should not be forwarded.
- Theft, carelessness, and waste have a direct impact on Dexcom's profitability. Each of us must ensure that Dexcom property is used for legitimate business purposes.
- Employees must immediately report any misuse or suspected misuse of Dexcom assets to their supervisor, Legal, or Compliance.

Dexcom's IP Legal and IT teams can provide more information on these topics.

Accuracy of Corporate Books and Records

Dexcom's financial books, records, and accounts must fully, accurately, and fairly reflect business transactions.

They must also comply with applicable laws, regulations, and accounting practices, as well as internal policies and procedures. This helps Dexcom meet our obligations to investors, employees, and business partners, as well as the public and government agencies.

Guiding Principles

- All Employees are responsible for ensuring any books and records they create or oversee are compliant. We can achieve that by ensuring all records:
  - Are complete, accurate, honest, and submitted in a timely manner.
  - Adhere to applicable standards and internal policies and procedures.
  - Are retained or destroyed according to the Records Retention Policy.
- All Employees must immediately report to Finance and/or Legal any incomplete, unfair, or inaccurate public disclosures as well as awareness of any transaction or development that may require disclosure.

Q: Who is responsible for Dexcom's policy regarding record management?

A: Legal and Quality have company-wide responsibility for the record management program. The Records Retention and Email Retention Policies provide retention guidelines for specific types of documents.

Q: How long do I need to keep various records that I have?

A: Records should be maintained in a manner that complies with appliable regulatory and contractual requirements and Dexcom policies and procedures.

Dexcom's Finance and Legal teams can provide more information on these topics.

Conflicts of Interest

A conflict of interest can occur when you, or a close personal friend or family member:

- Have personal interests that interfere – or appear to interfere – with those of Dexcom.
- Take actions or have interests that may make it difficult to perform work for Dexcom objectively and effectively.
- Receive improper personal benefits as a result of your position with Dexcom.

Guiding Principles

- We are all responsible for avoiding situations where loyalties may be divided between Dexcom's interests and our own.
- Dexcom Employees should seek to avoid even the appearance of a conflict of interest.

Q: What are some examples of conflicts of interest?

A: While it is impossible to define every situation, some examples include:

- Aiding Dexcom's competitors by passing confidential information to, or accepting payments or other benefits from, a competitor.
- Taking personal advantage of corporate opportunities brought to your attention in the course of service with Dexcom
- Outside employment with or personal investment in any company that does business with Dexcom or seeks to do business with Dexcom.
- Owning a significant financial interest in a competitor or a company that does – or seeks to do – business with Dexcom.
- Having management authority over or transacting Dexcom business with a family member or close personal friend.
- Soliciting or accepting payments, gifts, loans, favors or preferential treatment from any person or entity that does or seeks to do business with Dexcom.

All employees must report any actual, perceived, or potential conflicts of interest to Compliance.

Find more on the Compliance intranet site! Check out the Conflicts of Interest Policy and FAQs for more information.

Insider Information and Trading

Material, Non-Public Information

Material, Non-Public Information is any information that has not yet been released to the public that an investor might consider important in determining whether to buy, sell, or hold a security.

While conducting business for Dexcom, including discussions with customers, distributors and/or suppliers, we may become aware of material non-public information about Dexcom or other organizations. **Employees must exercise the utmost care when in possession of material, non-public information and only use such information to conduct Company business.**

Guiding Principles

- Insider trading is strictly prohibited. Never purchase or sell, either directly or through another person, any type of security while you are aware of material, non-public information about Dexcom or other companies.
- Tipping is also prohibited. “Tipping” refers to providing material, non-public information regarding Dexcom or another publicly traded company to family, friends, or others
- Do not buy or sell Dexcom securities in a way that may give rise to the appearance of impropriety.

Did you know?

Dexcom policy and US Federal Law, as well as the laws of many countries around the world, prohibit insider trading and tipping. Violation of these laws could result in severe penalties for the company and individual employees. If you have any questions about trading securities, contact Legal or Finance.

Dexcom’s Finance team can provide more information on this topic.

Media Contacts and Public Communications

Dexcom will disclose material information to the public only in accordance with its communications and disclosure guidelines and policies. This ensure that we avoid inappropriate publicity and that all such information is communicated in a way that is reasonably designed to provide broad, non-exclusionary distribution.

Guiding Principles

- Dexcom has designated certain employees as its official spokespersons for financial matters and for marketing, technical and other related information.
- Any inquiries from the press, investors, or financial analysts should be referred to these individuals.
- No other Dexcom Employees are authorized to speak on behalf of the Company unless an exemption has been granted.

Q: What should I do if someone from the press or media contacts me with questions about Dexcom?

A: All inquiries or calls from the press should be referred to Public Relations. Inquiries from investors and financial analysts should be referred to Investor Relations.

Social Media

Social media continues to evolve and change the way we work, communicate internally and externally, and interact with our stakeholders.

Guiding Principles

- Use good judgment and be respectful, honest, and transparent when posting about topics relevant to Dexcom.
- Avoid posting about other companies or their products.
- Report any adverse events or complaints you may see online.
- Protect confidential information and trade secrets and do not disclose any nonpublic information online.
- Think before you post and do not respond to negativity.

These principles apply to posts, links, comments, and shares across all social media platforms.

Public Dexcom Posts

- Only employees specifically authorized by Marketing may post on behalf of Dexcom on social media.
- While you can share these public posts, any additional commentary you provide is subject to the Guiding Principles.

Q: An individual reached out to me via social media to ask whether a Dexcom device would be appropriate for their medical condition. How should I respond?

A: Never give medical advice in a social media post. Medical questions should be referred to an individual's treating physician.

Q: What do I do if a member of the press/media, an investor, or a financial analyst reaches out to me on social media with questions about Dexcom?

A: Follow the principles in the Media Contacts and Public Communications section of this Code.

Find more on the Compliance intranet site! Check out the Social Media – Personal Use Policy for more information.

Privacy and Personal Data

Privacy at Dexcom

Dexcom is committed to incorporating a privacy by design framework in our daily operations. This means that we proactively embed data privacy and protection principles into the design, operation, and management of all our products and systems. As we develop and maintain products and systems, we will respect user privacy and keep our data collection practices open and transparent.

Personal data is defined as information that can directly or indirectly identify a natural person.

At Dexcom, our patients, employees, healthcare professionals, vendors, and many others entrust us with their personal data. We are committed to preserving the security, confidentiality, integrity, and availability of personal data throughout its lifecycle, from creation through disposition.

Guiding Principles

- Collect and use the minimum amount of personal data necessary to achieve the purposes for which it was collected.
- Keep personal data for only as long as necessary to achieve these purposes.
- Share personal data only with individuals who have a legitimate need for it and are authorized to receive it.

Did you know?

All Dexcom Employees are responsible for data privacy and security. If you learn of an inappropriate disclosure of personal data, contact the Global Privacy team immediately

Dexcom's Global Privacy team is part of the Legal department and can provide more information on this topic.

Corporate Responsibility

1. Diversity and Inclusion in the Workplace
2. Environmental Health, Safety & Sustainability
3. Grants and Donations
4. Political Activity
5. Human Rights

Diversity and Inclusion in the Workplace

Dexcom is a global company, and we strive to understand the cultures and customs in the countries where we operate. We foster a stimulating, creative, and nondiscriminatory workplace for all Employees and business partners. We promote diversity, practice fairness, and treat everyone with respect and dignity.

Guiding Principles

- We respect each individual and promote and celebrate diversity and inclusion in our workforce.
- We provide equal opportunities for employment without regard to characteristics such as race, national origin, age, gender, gender identity, sexual orientation, disability, religious beliefs, military or veteran status, or other characteristics protected by applicable law.
- We base employment decisions on merit and only consider skills, experience, and personal aptitude.
- Dexcom promotes and values a workplace free of verbal or physical harassment. Managers are responsible for maintaining a work environment that is free of harassment and discrimination.

Reporting

Any instances of discrimination or harassment must be reported to Human Resources and/or Compliance or through any of the channels identified in Resources and Reporting Concerns.

The Human Resources team can provide more information on this topic.

Environmental Health, Safety & Sustainability

Dexcom is dedicated to establishing a safe and healthy workplace that complies with all appropriate laws and regulations.

Guiding Principles

- Be proactive and cooperative on issues of safety and health.
- Promptly report unsafe or hazardous conditions to supervisors.
- Comply with all applicable policies, laws, regulations, and standards relating to conditions of employment, including those concerning wage and hour, workplace safety, industrial hygiene, and other working conditions.

Did you know?

Any work-related injuries, safety incidents, or illnesses must be reported to Environmental Health, Safety, & Sustainability (EHSS). EHSS uses these reports to investigate incidents and/or update policies and procedures to prevent future incidents.

Environmental Sustainability

At Dexcom, thinking big also means committing to operating our business in a manner that is responsible for, and protective of, the environment.

Dexcom Commitments

- We aim to reduce the environmental impacts from our operations and products.
- We manage environmental risks.
- We pursue sustainability initiatives including conserving natural resources; reducing emissions; effluents and waste; and promoting recycling.
- We also encourage and expect environmental compliance by our suppliers and subcontractors.

Animal Welfare

Dexcom is committed to conducting all animal research in a responsible, humane, and ethical manner. We maintain high standards of animal care and welfare consistent with or exceeding those required by law. We also support the development and adoption of alternatives to animal research.

Grants and Donations

Dexcom supports third party programs for a variety of reasons, including advancing medical education and training for HCPs, raising patient and public awareness about diabetes, supporting our community, and funding independent research. We are committed to ensuring that our financial and in-kind grants are distributed for valid educational, charitable, and similar purposes.

Guiding Principles

- Dexcom ensures that its financial and in-kind grants are distributed for valid educational, charitable, or scientific purposes.
- Dexcom must avoid improper inducements, rewards, conflicts of interest, or any appearance of impropriety.
- We cannot issue grants to individual HCPs.
- Dexcom funding may not be provided for programs that promote information about the use of our products for unapproved uses.

Find more on the Compliance intranet site! Check out the Grants Request and Grants Committee Policy for more information. There is also a link to the Grants Portal that you can share with requesting organizations.

Political Activity

Dexcom is committed to good citizenship and community involvement.

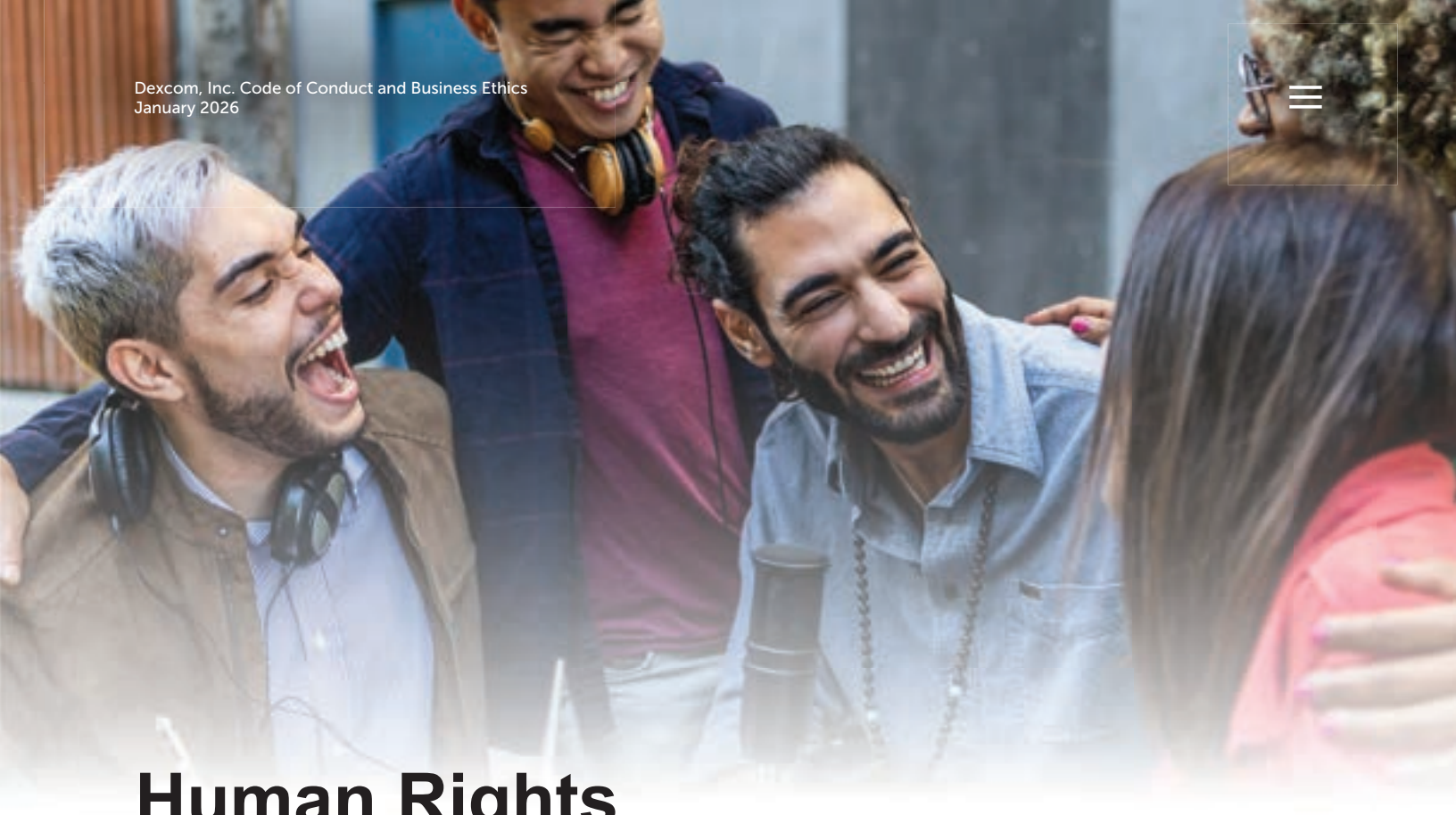
Guiding Principles

- Dexcom reserves the right to communicate its position on important issues to elected and other government officials and, where appropriate, may provide support to political candidates, political action committees, or interest groups.
- Dexcom complies fully with all local, state, federal, foreign, and other applicable laws, rules, and regulations regarding political contributions.
- All political and lobbying activities and contribution of Dexcom funds must be coordinated with Government Affairs, Legal, and Compliance.

Individual Support

Political contributions or activities by Employees on their own behalf are permitted, but Employees should not make such contributions in a way that might appear to be an endorsement or contribution by Dexcom.

No employee may be reimbursed directly or indirectly by Dexcom for any political contribution or for the cost of attending any political event.



Human Rights

Dexcom operates with the highest standards of ethics and integrity.

- We will not tolerate or condone human trafficking or slavery in any part of our global organization.
- Child labor and illegal, abusive, or forced labor have no place in our operations or the operations of our suppliers or other third-party vendors.

Guiding Principles

We are committed to maintaining and improving our systems and processes, and to eradicating any human trafficking and slavery within our direct supply chain. We do this by:

- Evaluating and addressing risk.
- Ensuring our Suppliers are aware of Dexcom's policies and position in relation to modern slavery or human trafficking and requiring Suppliers to comply with all applicable laws, regulations, rules, orders, and other legal requirements.
- Holding violators accountable.
- Training Employees involved in manufacturing and supply chain activities.
- Reserving the right to audit Employees and Suppliers for compliance.

Q: Who do I contact if I witness or suspect a potential violation of human rights law, regulations, or Dexcom policy?

A: Please contact Human Resources, Legal, and/or Compliance or use any of the channels identified in Resources and Reporting Concerns.

Find more on the Compliance intranet site! Dexcom has policies that prohibit the use of forced or compulsory labor in the manufacture of our products and components.

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No Rights Created

This Code is a statement of fundamental principles, policies, and procedures that govern Dexcom Employees and Directors in the conduct of Dexcom business. It is not intended to and does not create any legal rights for customers, suppliers, competitors, stockholders, or any other person or entity.