

dexcom



DEXCOM, INC. CODE OF CONDUCT AND BUSINESS ETHICS

August 2019



A MESSAGE FROM OUR CEO



Since our founding in 1999, Dexcom has focused on better outcomes for patients, caregivers, and clinicians by delivering solutions that are best in class – while empowering our community to take control of diabetes. Dexcom is now a global company. To continue building on our tremendous success as we grow our core business and enter into new markets, we must behave in an ethical, responsible, and principled manner. Every business decision we make matters. We are all responsible for understanding the important legal and ethical issues that affect our business and for conducting our business with honesty, integrity, and fairness.

This Code of Conduct and Business Ethics is an essential resource for all Dexcom officers, directors, and employees. Please read this Code carefully as it summarizes our Company's values on many important issues affecting our business and community, sets requirements for business conduct, and serves as the foundation of our Company compliance program, policies and procedures, which provide additional guidance on how we are expected to conduct our business. While this Code cannot address every situation you will face during your employment at Dexcom, it is a good roadmap and, if you have questions, it directs you to additional resources.

We depend on you to uphold our core values, which help us earn and keep the trust of our partners, patients, healthcare providers, and the public. Thank you for your commitment.

A handwritten signature in black ink, appearing to read 'Kevin Sayer'. The signature is fluid and cursive, written over a thin horizontal line.

Kevin Sayer

Chairman, President & CEO

Dexcom

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INTRODUCTION

Our Core Values

At Dexcom, we operate with the highest standards of ethics and integrity. Every day, we strengthen our culture by following ethical practices and complying with all applicable laws and regulations, which allows us to maintain our reputation as the leader in transforming diabetes care and management by providing continuous glucose monitoring (CGM) technologies to help patients and healthcare professionals better manage diabetes. We also aspire to continue to grow globally, enter new markets, and potentially expand the use of our products to other disease states. The principles set out in this Code will help us achieve these aspirations.

Each of us is responsible for upholding Dexcom's good reputation and high standards of ethical business conduct by:

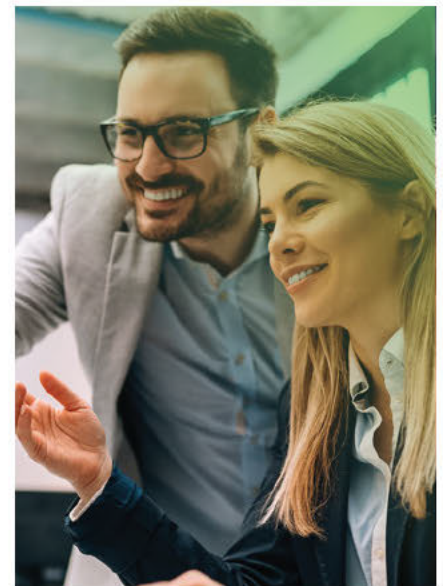
- **Serving with honesty and integrity.** Patients trust us with their health and their lives. Our success will only continue if we continue to earn our patients' trust by conducting our business with honesty and integrity. We believe that our core values – our desire to do what is right for our patients – puts us at a competitive advantage.
- **Listening to our patients, healthcare professionals, and our employees.** Listening carefully allows us to comprehend the needs of people affected by diabetes.
- **Being dependable.** By focusing on quality and dependability, we inspire confidence within our community and in one another.
- **Thinking big.** We use technology to revolutionize diabetes care.



Scope

This Code applies to every person conducting business for Dexcom worldwide, including Dexcom's officers, directors and employees ("Employees") as well as consultants, contract workers, and temporary workers. It is your responsibility to read, understand, and comply with this Code. This Code cannot address every issue or circumstance that may arise during your employment at Dexcom. In complying with the letter and spirit of this Code, Employees must apply common sense and high personal standards of ethics, honesty, integrity and accountability in making business decisions. In certain instances, Employees must also consider the conduct of their family members and others who live in their household.

This Code is intended as a guide and is meant to supplement – not replace – existing Company policies and procedures. It is your obligation to stay up-to-date on the policies and procedures that are applicable to you. Please check the [Compliance Intranet Website](#) to ensure that you have the most up-to-date versions of our policies and procedures.



Tone at the Top

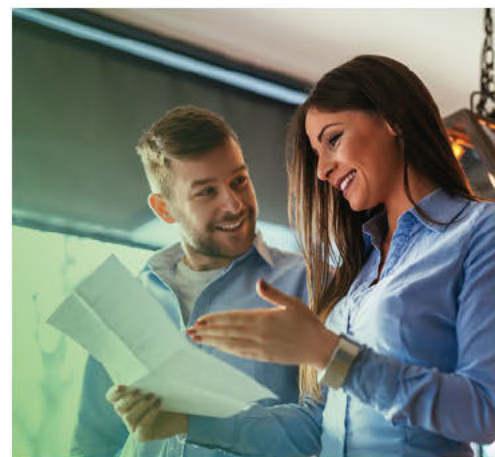
Dexcom expects its directors, officers, executives, senior managers, managers and other supervisory personnel to help foster a strong commitment to this Code among all employees, and to foster a culture of fairness, honesty, integrity and accountability within the Company. It is also our obligation to ensure that Dexcom's suppliers, agents and other third parties comply with the Company's Supplier Code of Conduct.

Speaking Up and Asking Questions

If you need help understanding this Code, or how it applies to conduct in any given situation, do not hesitate to contact your supervisor or the Compliance Department.

For additional contacts within the company, please see [How to Report and Additional Contact Information](#).

Additionally, **it is your obligation to speak up and alert the company to possible violations of this Code by others**. Dexcom does not tolerate retaliation against any Employee who, in good faith, reports suspected violations of this Code. Please see [Accountability and Adherence to Code](#) for further details.



HOW WE CONDUCT OUR BUSINESS

Dexcom's success depends upon every Employee performing his or her duties ethically and in compliance with all applicable laws and regulations in the countries in which we do business. 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. This Code does not contain a comprehensive list of applicable laws and regulations, and it is up to you to approach your supervisor or the Compliance Department for further guidance.

Healthcare Laws and Regulatory Requirements

Dexcom is subject to many rules 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.

We are committed to following the laws and regulatory requirements that govern our business, including those pertaining to the development, manufacturing, distribution, marketing, government contracting, sale and promotion of our products. 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.



Interacting with Patients and Patient Groups

Dexcom is committed to appropriate interactions with patients and patient groups.

We listen to and exchange ideas with our patients 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 developing better solutions for our patients.

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.

We should never make a patient feel like he or she is being marketed to. Given complex and evolving legal, regulatory and industry requirements pertaining to interactions with patients and patient groups, including interactions with patient groups relating to certain patient assistance programs, please consult with the Compliance Department to help ensure compliance when interacting with patients.

Interacting with Healthcare Professionals

We interact with healthcare professionals in many ways, including medical information communications, promotional activities, research and educational efforts, consulting arrangements, and others. Our relationships with healthcare professionals enable us to:

- Obtain feedback and advice regarding the clinical use of our products, which allows us make enhancements to our products;
- Conduct further medical research, education and awareness; and
- Inform healthcare professionals about the use, benefits, and risks of our products.

We recognize that healthcare professionals' primary duty is to their patients. Accordingly, **our interactions with healthcare professionals must advance patient care and support the ethical and compassionate practice of medicine with integrity.** We also recognize that interactions with healthcare professionals can raise apparent or actual conflicts of interest. We support and require the disclosure of financial and other interests and relationships that may create apparent or perceived conflicts of interests in research, education, consultancy, advisory functions and clinical practice.

Interactions with healthcare professionals are also subject to many laws around the globe, including what are sometimes referred to as anti-kickback laws. These laws 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. We comply with these laws by ensuring that we never improperly influence healthcare professionals when they make treatment decisions or decisions about the use of our products. For more information, please consult the HCP Interactions Policy and reach out to the Compliance Department if you have any questions.





Interacting with the Scientific Community

Dexcom is committed to acting with the highest standards of integrity and honesty when interacting with the scientific community. Dexcom may interact with the medical and scientific community in many ways, including:

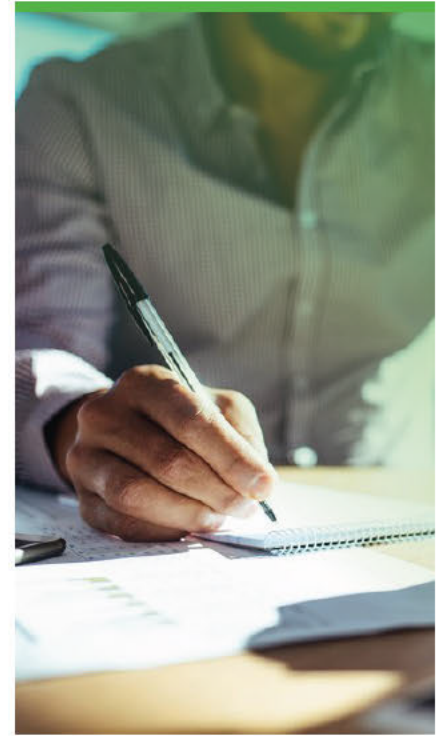
- Supporting medical education by providing fair and balanced information about our products and their appropriate use
- Organizing medical or scientific meetings or events, or contributing to scientific and educational meetings organized by third parties
- Entering into compensation-for-service arrangements with external experts to perform a meaningful service or activity in medical or scientific-related domains for legitimate needs, such as conducting studies, participating in scientific meetings, and providing consulting services.

Engaging an expert for services must not constitute an inducement or reward for prescribing, purchasing, supplying, selling, administering, recommending, or arranging for any Dexcom product or service. **We select experts using objective criteria based on the defined need, not on the expert's past or expected future use or recommendation of Dexcom products.** When determining compensation of experts, we must be reasonable in calculating the fair market value of the experts' services.

The laws and regulations governing our arrangements and interactions with the scientific community are complex and evolving. In order to ensure that our interactions remain compliant, please consult the applicable Dexcom policies and procedures and reach out to the Compliance Department if you have any questions.

Anti-Bribery and Anti-Corruption

Dexcom prohibits its Employees and anyone else acting on Dexcom's behalf from offering, giving, requesting, accepting or receiving bribes.



Government Officials

Most countries in which we do business have laws that forbid making or offering any payment or anything of value to a government official in order to improperly influence the government official to secure an award or favorable regulatory treatment, retain business or gain an improper business advantage. Examples of such laws include the US Foreign Corrupt Practices Act ("FCPA") and the UK Bribery Act.

Dexcom and its subsidiaries and colleagues must comply with these laws, as well as all local and international anti-bribery and anti-corruption laws. We must be particularly sensitive to bribery and corruption issues because governments are often both the regulators of our products and major customers. We also interact regularly in various ways with healthcare professionals, hospital personnel, researchers, academia and scientists, many of whom are employees of public or state-owned institutions and may be considered government officials. **No Dexcom Employee nor anyone acting on Dexcom's behalf may offer, authorize or provide a payment or benefit that is intended to improperly influence — or even appear to improperly influence — a government official or gain any unfair business advantage.**



Commercial Bribery

Dexcom also prohibits “commercial bribery.” Generally, commercial bribery is giving, offering, requesting, accepting or receiving something of value to or from an individual or company to secure an improper advantage in a commercial conduct. **Dexcom prohibits any Employee or anyone acting on Dexcom’s behalf from directly or indirectly engaging in any form of commercial bribery.**

For more information on bribery, please consult Dexcom’s Anti-Corruption Policy and reach out to the Compliance Department if you have any questions.



Meals, Gifts and Entertainment

Building strong relationships with customers, distributors and suppliers is essential to Dexcom's business. Socializing with customers, distributors and suppliers is an integral part of building those relationships. However, good judgment should be exercised in providing or accepting business meals and entertainment or gifts, so that all such conduct is consistent with customary and prudent business practices and compliant with applicable laws and regulations.

While individual circumstances differ, the overriding principle concerning meals, gifts, entertainment, and other types of gratuities is not to give or accept anything of value that could be perceived as creating an obligation on the part of the recipient (whether a Dexcom Employee, a customer, a distributor or a supplier) to act other than in the best interests of his or her employer or otherwise to taint the objectivity of the individual's involvement. This principle applies to Dexcom's transactions everywhere in the world, even if it conflicts with local custom.

It is the responsibility of each Employee to ensure that providing or accepting a gratuity is appropriate, legal, and compliant with Company's policies and procedures. Please consult Dexcom's policies and procedures with respect to the provision of meals, gifts and entertainment. If you have any questions or concerns, reach out to the Compliance Department.

Political Contributions, Charitable Donations and Sponsorships

Dexcom reserves the right to communicate its position on important issues to elected representatives 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 and lobbying. All political and lobbying activities and contributions of Dexcom funds must be coordinated with Government Affairs, Legal, and Compliance.

Dexcom is committed to good citizenship and community involvement. Political contributions or activities by employees on their own behalf are permissible. Employees should not make such contributions in a way that might appear to be an endorsement or contribution by Dexcom. No person may be reimbursed directly or indirectly by the Company for any political contribution either to a candidate or a PAC or for the cost of attending any political event.



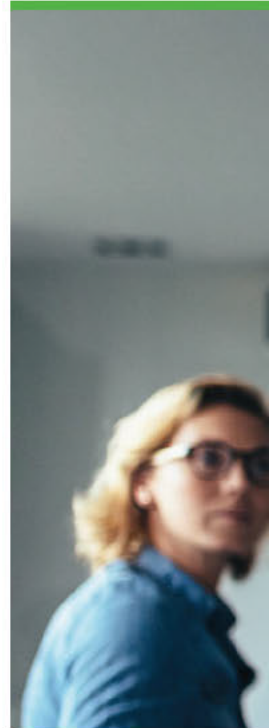
Fair Business Dealings

Dexcom strives to compete vigorously in the marketplace through superior business performance, quality, service and price, and not through unethical or illegal business practices. No Employee may through improper means acquire proprietary information from others, possess trade secret information, or induce disclosure of confidential information from past or present employees of other companies. Employees who have obtained information of this variety by mistake or who have any questions about the legality of future actions must consult with the Compliance Department for further guidance.

All Employees are expected to deal fairly and honestly with Dexcom customers, suppliers, employees and anyone else with whom they have contact with when performing Company duties. Making false or misleading statements about Dexcom's competitors is prohibited, inconsistent with Dexcom's reputation for integrity, and harmful to Dexcom's business. Employees may not take unfair advantage of anyone through misuse of confidential information, misrepresentation of material facts or any other unfair business practice.

Procurement

Employees involved in procurement have a special responsibility to adhere to principles of fair competition in the purchase of products and services by selecting suppliers based exclusively on legitimate commercial considerations such as quality, cost, availability, service and reputation, and not on the receipt of special favors or bribes.



Sales

Employees involved in sales have a special responsibility to abide by all Company policies regarding sales activities, including policies relevant to HCP interactions, sampling, and revenue recognition by the Company. Sales activities may implicate federal or state fraud and abuse laws as well as country and local laws in jurisdictions outside of the U.S. 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. It is extremely important that our sales staff operate in compliance with applicable law and Company policy, violations of which may result in discipline up to and including termination. If you have questions, please reach out to the Compliance Department.



Antitrust and Competition Laws

Antitrust and competition laws promote fair competition and protect customers from unfair business practices. These laws generally prohibit arrangements with competitors that involve price fixing, prevention or restriction of free competition, and unfair trade practices.

We comply with all applicable antitrust and competition laws and regulations.

Some kinds of information, such as pricing, production and inventory, should never be exchanged with competitors, regardless of how innocent or casual the exchange may be, because even where no formal arrangement exists, merely exchanging information can create the appearance of an improper arrangement.

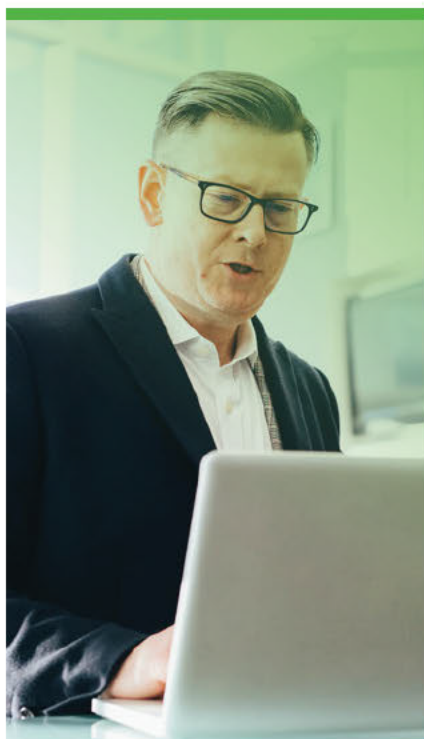
Noncompliance with antitrust laws can have extremely negative consequences for Dexcom, including long and costly investigations and lawsuits, substantial fines or damages, and adverse publicity. Antitrust and unfair competition laws are complex; therefore, Employees are urged to seek assistance from the Legal or Compliance Departments whenever they have a question relating to these laws.

Clinical and Regulatory Affairs

The products designed, manufactured, and sold by Dexcom are regulated by government authorities throughout the world. We are committed to timely and accurate reporting to regulators and to maintaining open, honest and professional relationships with regulators.

Every Dexcom Employee must be aware of the laws and regulations that are relevant to his or her responsibilities and comply with such laws and regulations. To help ensure safety, product quality and regulatory compliance, Employees must adhere to regulatory and generally accepted good manufacturing, good clinical and good laboratory practices and quality system requirements. Employees must conduct product clinical trials in accordance with regulatory and ethical standards including making accurate product claims and supporting such claims with product testing and clinical trials where appropriate.

Each Employee is responsible for reporting any significant issues to his or her supervisor and/or the Clinical or Regulatory Affairs Departments.



Product Quality

We are committed to ensuring that our products consistently meet or exceed the quality standards required in the medical device industry. We are dedicated to the highest standards of patient safety and well-being. Every Employee at Dexcom must report any concerns or issues relating to compromises in quality or patient safety in a timely manner to the Quality Department.



Global Trade Controls Laws

Dexcom is responsible for complying with global trade control laws, which are complex and may change quickly as governments adjust to new political and security issues. They include:

- **U.S. embargoes**, which may restrict or, in some cases, prohibit U.S. persons, corporations and foreign subsidiaries from doing business with certain countries, groups or individuals;
- **Export controls**, which restrict travel to designated countries or prohibit or restrict the export of goods, services and technology to designated countries, identified persons or entities from the United States, or the re-export of U.S.-origin goods from the country of original destination to such designated countries or identified companies or entities; and
- **Anti-boycott compliance**, which prohibits U.S. companies from taking any action that has the effect of furthering any unsanctioned boycott of a country friendly to the United States.

Violations of global trade control laws can lead to significant fines and penalties for Dexcom and any individuals involved, as well as other business and supply chain issues. In addition, many global trade laws restrict Dexcom's investments, transactions, research and business activities with certain markets, entities or individuals.

If you are unsure about a potential business or commercial venture and whether global trade laws apply, please contact the Legal or Compliance Departments for further information. All activities involving restricted parties or restricted markets must be reviewed by Legal or Compliance.

SAFEGUARDING OUR COMPANY

Intellectual Property and Confidential Business Information

Dexcom's intellectual property and confidential business information are key assets that we must secure and protect. Intellectual property includes copyrights, patents, trademarks, product and package designs, brand names and logos, research and development, inventions and trade secrets.

It is the obligation of every Employee to take precautions to protect the Company's intellectual property and confidential business information. Employees must not share confidential Company information, or any confidential information of a customer, distributor, supplier, service provider, business partner, or other third party, with anyone who has not been authorized to receive it, except when disclosure is authorized or legally mandated. Employees must take precautions to protect confidential information, both while working for Dexcom and after employment ends.

If you have any questions regarding intellectual property or confidential business information, please contact your supervisor or the Intellectual Property Department. Any suspected theft of intellectual property or unauthorized disclosure of, or access to Company information must be reported to the Intellectual Property and Legal Departments immediately.



Protecting and Using Company Assets

Protecting the Company's assets begins with developing good practices.

Employees should take steps to:

- **Secure documents:** Ensure that business-related paperwork and documents are produced, copied, faxed, filed, stored and discarded by means designed to minimize the risk that unauthorized persons might obtain access to confidential information.
- **Communicate privately:** Employees should not discuss sensitive matters or confidential information in public places such as airports or coffee shops, on unsecure communication lines, or in any internet forum.
- **Presume confidentiality:** All company emails, voicemails and other communications should be presumed confidential and should not be forwarded or otherwise disseminated outside of the Company, except where required for legitimate business purposes.

Theft, carelessness and waste have a direct impact on Dexcom's profitability. Accordingly, all Employees and directors are expected to ensure that Company property, including computer equipment, buildings, furniture and furnishings, office supplies and products and inventories, are used for legitimate business purposes, although incidental personal use is permitted.

Except where mandated by law, Dexcom retains the right to access, review, monitor and disclose any information transmitted, received or stored using the Company's electronic equipment, with or without an Employee's or third party's knowledge, consent or approval. Employees must immediately report any misuse or suspected misuse of the Company's assets to their supervisor or the Compliance Department.

Accuracy of Corporate Books and Records

Dexcom's financial books, records and accounts must fully, accurately and fairly reflect the Company's business transactions. They must also comply with applicable laws, regulations, and accounting practices, as well as Dexcom's policies and procedures. This will help Dexcom meet its obligations to investors, employees, business partners, as well as the public and government agencies.

All Employees must make sure that the books and records they create or are responsible for are:

- Complete, accurate, and honestly reflect the Company's business transactions;
- Timely and in accordance with applicable accounting rules and standards and Dexcom's internal policies, practices, and procedures; and
- Retained or destroyed according to the Company's Records Retention Policy.

Further, all Employees must cooperate fully with Dexcom's Finance Department, independent public accountants, and counsel; respond to their questions with candor; and provide them with complete and accurate information to help ensure that the Company's books, records, and reports filed with the SEC are accurate and complete.

If any Employee becomes aware that Dexcom's public disclosures are not full, fair and accurate, or if any Employee becomes aware of a transaction or development that he or she believes may require disclosure, he or she should report the matter immediately to the Finance and/or Legal Departments.

Records Management

The Compliance Department, in coordination with the Quality Department and Records Control, has company-wide responsibility for developing, administering and coordinating the record management program, and issuing retention guidelines for specific types of documents. Records should be maintained to comply with applicable statutory, regulatory or contractual requirements, and pursuant to Company policies and procedures. Employees can consult the Records Retention Policy or contact the Compliance Department for specific information on record retention.



Conflicts of Interest

A conflict of interest occurs when an individual's private interest (or the interest of a member of his or her family) interferes – or appears to interfere – with the interests of the Company as a whole. A conflict of interest can arise when an Employee (or a member of his or her family) takes actions or has interests that may make it difficult to perform his or her work for Dexcom objectively and effectively. Conflicts of interest also arise when an Employee (or a member of his or her family) receives improper personal benefits as a result of his or her position with Dexcom.

Although Employees are generally free to engage in personal financial and business transactions, this freedom is not without constraints. **Every Employee must avoid situations where loyalties may be divided between Dexcom's interests and the Employee's own interests.**

Employees should also seek to avoid the appearance of a conflict of interest.

Factors to Consider

- Could the activity benefit the Employee or his or her relative, directly or indirectly?
- Would the activity appear improper to an outsider?
- Could the activity interfere with the job performance or morale of an Employee?
- Does the Employee involved in the activity have access to confidential Company information or influence over significant Company resources or decisions?
- What impact will the activity have on the Company's business relationships, including relationships with customers, suppliers, service providers, competitors, partners, Employees and anyone else with whom an Employee has contact in the course of performing his or her job?

Examples of Conflicts of Interest

- Aiding Dexcom's competitors, such as passing confidential Company information to a competitor or accepting payments or other benefits from a competitor.
- Taking personal advantage of corporate opportunities brought to an Employee's attention in the course of his or her service to Dexcom.
- Participating 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 business with Dexcom or seeks to do business with Dexcom.
- Having authority on behalf of Dexcom over a co-worker who is also a family member, or transacting business on behalf of Dexcom with a family member.
- Soliciting or accepting payments, gifts, loans, favors or preferential treatment from any person or entity that does or seeks to do business with Dexcom.

Although this Code provides examples of conflicts of interest, it is impossible to define every situation. If you are unsure if an activity presents a conflict of interest, please contact your supervisor or the Compliance Department.



Director Conflicts

Like other Employees, Directors should also seek to avoid conflicts of interest – and appearances of conflicts of interest – with their obligations to Dexcom. Any Director who confronts a conflict of interest or potential conflict of interest should:

- Disclose the conflict of interest to the Chief Compliance Officer and Audit Committee Chair
- Take appropriate action to avoid or mitigate the conflict of interest, or appearance of a conflict of interest, including, if requested, recusing himself or herself from discussions and decisions by the Board that could be perceived to create such a conflict.

Employee Loans

Loans to Employees or their family members by Dexcom, or guarantees of their loan obligations, could constitute an improper personal benefit to the recipients of such loans or guarantees. Accordingly, Company loans and guarantees for Executive Officers and Directors are expressly prohibited by law and Company policy. Any loans to other employees require the prior approval of the Board of Directors.



Insider Information and Trading

In the course of doing business for Dexcom, or in discussions with one of its customers, distributors or suppliers, Dexcom Employees and Directors may become aware of material non-public information about Dexcom or another organization. "Material, non-public information" is any information that a reasonable investor might consider important in determining whether to buy, sell, or hold a security and that has not yet been widely disseminated to the public. Employees may only use such information for the purpose of conducting Company business.

Dexcom Employees and Directors should consider the following before purchase or selling securities:

- **Insider trading is prohibited.** Never purchase or sell, either directly or through a family member or others, any type of security while you are aware of material, non-public information about Dexcom or another company. This is prohibited by federal law and Company policy. This same prohibition applies to trading in the stock of other publicly held companies on the basis of material, non-public information.

- **Tipping is prohibited.** Federal law and Company policy also prohibit an Employee or Director from passing along (“tipping”) to family, friends, or others material, non-public information that the Employee or Director learns about Dexcom or any other publicly traded company in the course of employment or service on the Board.
- **Do not buy or sell Dexcom securities that may give rise to an appearance of impropriety.** Keep in mind that if any trade an Employee or Director makes becomes the subject of an investigation by the government, the trade will be viewed after-the-fact with the benefit of hindsight. Consequently, Employees and Directors should always carefully consider how their trades would look from this perspective and seek guidance from the Legal Department.

Because of the sensitive nature of and severe penalties associated with insider trading and tipping, Employees and Directors must exercise the utmost care when in possession of material, non-public information. All Employees and Directors shall follow the guidelines and policies on securities trading issued by Dexcom and should review Dexcom’s Insider Trading Policy. If you have any questions about a potential trade, please contact the Legal Department.



Media Contacts and Public Communications

It is Dexcom’s policy to disclose material information concerning Dexcom to the public only in accordance with its communications and disclosure guidelines and policies, in order to avoid inappropriate publicity and to ensure that all such information is communicated in a way that is reasonably designed to provide broad, non-exclusionary distribution of information to the public.

All inquiries or calls from the press, investors and financial analysts should be referred to the Executive Vice President, Strategy and Corporate Development. Dexcom has designated its Chief Executive Officer and Executive Vice President, Strategy and Corporate Development as its official spokespersons for financial matters and for marketing, technical and other related information. These persons are the only ones who are authorized to communicate with the press, investors or financial analysts on behalf of the Company, unless a specific exception has been made by the CEO or Executive Vice President, Strategy and Corporate Development.

PRIVACY OF PERSONAL DATA

Dexcom's patients, employees, healthcare providers and many others entrust Dexcom with their personal data, which is defined as information that can directly or indirectly identify a natural person. We are committed to preserving the security, integrity, and availability of personal data throughout its life cycle, from creation through disposition.

Employees can help protect the privacy of personal data by following certain principles, including:

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



Dexcom is also committed to incorporating 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.

All Dexcom Employees and workforce members are responsible for compliance with applicable laws and regulations and Company policies and procedures pertaining to data privacy and security. If you have any questions about data privacy, please consult the Personal Data Privacy Program Policy and other applicable policies and procedures or contact the Compliance Department. If you learn of an inappropriate disclosure of personal data, immediately contact the Compliance Department.

CORPORATE RESPONSIBILITY

Diversity and Inclusion in the Workplace

Dexcom is a global company, and we strive to understand the cultures and customs in the countries in which 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. Accordingly, Dexcom is committed to:

- **Promoting diversity and inclusion.** The distinct identities of our people and business partners are a source of strength and a key ingredient of our success.
- **Supporting equal employment opportunity** for each Employee or job applicant – without regard to any of the grounds listed below or other characteristics protected by applicable law – in recruitment, training access, compensation, welfare, internal mobility and career development. Skills, experience, and personal aptitude are the only factors we consider.
- **Maintaining a zero-tolerance policy for discrimination and harassment** on grounds including:

Race	Disability
Color	Citizenship status
National origin	Physical orientation
Religion	Physical appearance
Sex	Health or medical condition
Gender	Genetic information
Gender identity	Political opinions
Sexual orientation	Military or veteran status
Age	

At Dexcom, we respect each individual as we celebrate the diversity of our workforce. Always seeking to improve, we become more innovative as different ideas and ways of thinking are exchanged. **Striving toward a common goal, our differences form the basis of our strength as a company.**

Discrimination and Harassment

Dexcom promotes and values a work environment free of verbal or physical harassment.

This includes any unwelcome comments or actions regarding race, color, ethnicity, creed, ancestry, religion, sex, sexual orientation, age, gender identity or gender expression, national origin, marital status, pregnancy, childbirth or related medical condition, genetic information, military service, medical condition (as defined by applicable law), presence of a mental or a physical disability, veteran status or other characteristics protected by applicable laws.

Managers are responsible for maintaining a work environment that is free of harassment and discrimination. Employees who engage in acts of harassment or discrimination will be subject to disciplinary action, up to and including termination of employment.

Report instances of discrimination or harassment to the Human Resources Department, the Compliance Department or through any of the channels identified in [How to Report and Additional Contact Information](#).

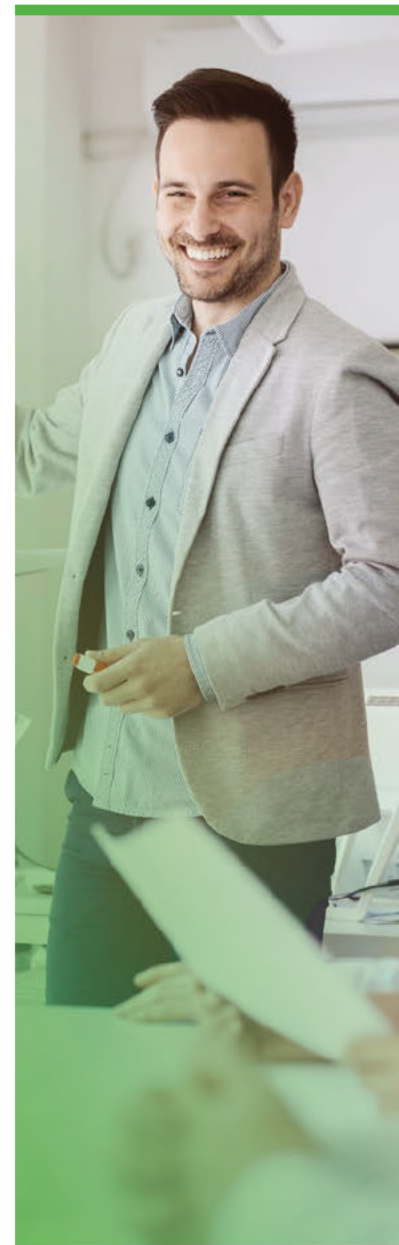
Safety and Health

Dexcom is dedicated to establishing a safe and healthy workplace that complies with all appropriate laws and regulations. Every Employee and Director is expected to take responsibility for working in a manner that is safe for themselves and other employees.

Every Employee and Director should:

- 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

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. In addition to requiring compliance with local laws and regulations, Dexcom has policies that prohibit the use of forced or compulsory labor in the manufacture of our products and components. 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 Human Resources Department, and/or the Compliance Department.

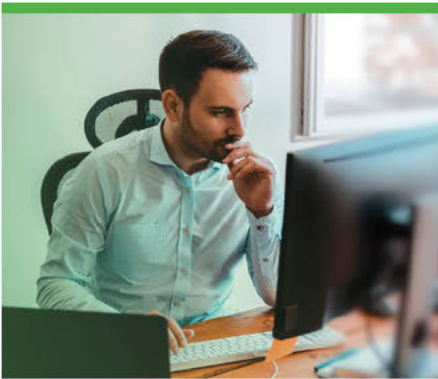


Environmental Sustainability

Dexcom strives to operate its business in a manner that is responsible to and protective of the environment. Specifically, we are committed to reducing the environmental impacts from our operations and products; managing environmental risks; and pursuing sustainability initiatives, including conserving natural resources, reducing emissions, effluents, and waste and promoting recycling. Employees are required to follow Dexcom policies and procedures and be familiar with and comply with applicable environmental laws and regulations that relate to their specific work responsibilities. We also encourage and expect environmental compliance by our suppliers and subcontractors. For more information on environmental sustainability, contact the Environmental Health and Safety or Compliance Department.

Animal Welfare

Dexcom is committed to conducting our animal research in a responsible, humane and ethical manner. Dexcom supports the development and adoption of novel, non-animal test methods for assessing the safety of new products that can reduce, replace and refine the use of animal testing. For those new products that require animal testing, Dexcom maintains high standards of animal care and welfare consistent with or exceeding those required by law.



ACCOUNTABILITY AND ADHERENCE TO CODE

Compliance Resources

Employees who are aware of a suspected or actual violation of this Code have a responsibility to report it. If you have questions, concerns, or become aware of or suspect that unethical or illegal conduct has occurred or is about to occur, you should discuss the matter promptly with your supervisor. If, however, you do not feel comfortable speaking with your supervisor about the matter, you should feel free to email your concerns to compliance@dexcom.com or contact any member of the Compliance Department directly. If you prefer to place an anonymous report in confidence, please use our [Compliance Hotline](#). For more information, see [How to Report and Additional Contact Information](#).

Policy Against Retaliation

Retaliation against someone who seeks advice, raises a concern, reports misconduct or provides information in an investigation is strictly prohibited. Some examples of retaliation include denial of benefits, termination, demotion, suspension, threats, harassment or discrimination. If any individual, regardless of his or her role in Dexcom, retaliates against an Employee who has reported a potential violation, Dexcom will take appropriate action—even if no violation is ultimately confirmed.

If you believe that you or another Employee has been retaliated against for seeking advice, raising a concern, reporting misconduct or providing information in an investigation, you should contact the Compliance Department immediately.





Confidentiality and Investigations

All information regarding suspected ethical or Code violations or unlawful activity will be received on a confidential basis. The Chief Compliance Officer, or the CCO's designee, will promptly investigate all reported potential misconduct with the highest degree of confidentiality that is possible under the circumstances.

Employees have an obligation to cooperate with Company investigations. As needed, the Chief Compliance Officer will consult with other resources such as outside legal counsel, the Legal Department, the Human Resources Department, the Environmental Health and Safety Department, the Audit Committee, or the full Board of Directors, if necessary.

At the conclusion of the investigation, the Chief Compliance Officer, or the CCO's designee, will document and report the investigation findings and provide recommendations. If the investigation indicates that a violation has occurred, Dexcom will take such action as it deems appropriate under the circumstances. If Dexcom determines that an Employee is responsible for a violation, he or she will be subject to disciplinary action up to, and including, termination of employment and, in more severe cases, civil action or referral for criminal prosecution. The Company may also consider appropriate action to deter any future violations.

Throughout the investigation process, Dexcom will not tolerate adverse actions taken against an Employee for reporting violations of law or Company policies, or for participating in the investigation process. For additional information on investigations, see the Government Investigation and Internal Investigation Policy.

How to Report and Additional Contact Information

To report suspected Code violations, you may contact:

1. **Your direct supervisor**

2. **Compliance Email Address**

compliance@dexcom.com

3. **Chief Compliance Officer**

Ryan Macpherson
ryan.macpherson@dexcom.com

4. **Compliance Helpline (Internet)**

Visit website: <https://secure.ethicspoint.com/domain/media/en/gui/48920/index.html>

5. **Compliance Helpline (Telephone)**

Austria 0-800-200-288

Canada 1-844-678-0450
1-855-350-9393

England 01-800-912-0040

Germany 0-800-225-5288

Scotland 01-800-912-0040

Sweden 844-388-5278

Switzerland 0-800-890011

United States 1-844-678-0450

Complete country telephone numbers are provided at the website specific to the country in which you are reporting. This website is not hosted by Dexcom.

6. **Chair of the Audit Committee**

Mark Foletta
mfoletta@tocagen.com

7. [Dexcom's Compliance Intranet Web Site](#) provides additional information, including links to the Matter Management system and the Compliance Helpline, current policies and procedures, and training materials.





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 any customer, supplier, competitor, stockholder or any other person or entity.



DEXCOM, INC. CODE OF CONDUCT AND BUSINESS ETHICS

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Dexcom

Dexcom, Inc. | Corporate
Headquarters 6340 Sequence Drive
San Diego, CA 92121
dexcom.com