

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549

FORM SD  
SPECIALIZED DISCLOSURE REPORT

**DEXCOM, INC.**

(Exact Name of Registrant as Specified in its Charter)

**Delaware**

**000-51222**

**33-0857544**

(State or other jurisdiction of incorporation or  
organization )

(Commission File Number)

(IRS Employer Identification No.)

**6340 Sequence Drive, San Diego, California 92121**

(Address of Principal Executive Offices) (Zip Code)

**Mike Brown  
(858) 200-0200**

(Name and telephone number, including area code, of the person to contact in connection with this report.)

**Not Applicable**

(Former Name or Former Address, if Changed Since Last Report)

Check the appropriate box below to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

X Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period January 1 to December 31, 2021

**Item 1.01. Conflict Minerals Disclosure and Report.****Conflict Minerals Disclosure**

A copy of the Conflict Minerals Report of DexCom, Inc. (“Dexcom”) for the reporting period January 1 to December 31, 2021 is filed as Exhibit 1.01 to this specialized disclosure report on Form SD and is also available at Dexcom’s website at <https://investors.dexcom.com/sec-filings>.

**Item 1.02. Exhibit.**

Dexcom has filed, as an exhibit to this Form SD, a Conflict Minerals Report as required by Item 1.01 of this Form.

**Item 3.01. Exhibits.****Exhibit  
Number****Description of Document**

---

1.01

---

[DexCom, Inc. Conflict Minerals Report for the reporting period January 1 to December 31, 2021.](#)

## SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

### DEXCOM, INC.

Dated: May 31, 2022

By: /s/ Mike Brown  
Name: Mike Brown  
Title: Executive Vice President and Chief Legal Officer

**DexCom, Inc.**  
**Conflict Minerals Report**  
**For the Reporting Period January 1 to December 31, 2021**

This Conflict Minerals Report (“CMR”) has been prepared by DexCom, Inc. (herein referred to, alternatively, as “Dexcom,” “we,” “our” and “us”). This CMR for the reporting period January 1 to December 31, 2021 is presented to comply with the final conflict minerals implementing rules (“Final Rules”) promulgated by the Securities and Exchange Commission (“SEC”), as modified by guidance issued the SEC’s Division of Corporation Finance on April 29, 2014 and the SEC order issued on May 2, 2014. The Final Rules were adopted by the SEC to implement reporting and disclosure requirements related to conflict minerals as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 as codified in Section 13(p) of the Securities Exchange Act of 1934. The Final Rules impose certain reporting obligations on SEC registrants whose manufactured products contain conflict minerals that are necessary to the functionality or production of their products. “Conflict minerals” are currently defined by the SEC as cassiterite, columbite-tantalite (coltan), gold, wolframite, or their derivatives, which the SEC has currently limited to tin, tantalum, and tungsten.

To comply with the Final Rules, we conducted a reasonable country of origin inquiry (“RCOI”) and due diligence on the origin, source and chain of custody of the conflict minerals that were necessary to the functionality or production of the products that we manufactured or contracted to manufacture to ascertain whether these conflict minerals originated in the Democratic Republic of the Congo or an adjoining country (collectively, “Covered Countries”) and financed or benefited armed groups (as defined in Section 1, Item 1.01(d)(2) of Form SD) in any of these countries.

Pursuant to guidance issued by the SEC’s Division of Corporation Finance on April 29, 2014 and the SEC order issued May 2, 2014, Dexcom is not required to describe any of its products as “DRC conflict free” (as defined in Section 1, Item 1.01(d)(4) of Form SD), “DRC conflict undeterminable” (as defined in Section 1, Item 1.01(d)(5) of Form SD) or “having not been found to be ‘DRC conflict free,’” and therefore makes no conclusion in this regard in the report presented herein. Furthermore, given that Dexcom has not voluntarily elected to describe any of its products as “DRC conflict free,” an independent private sector audit of the report presented herein has not been conducted.

## **I. Company Overview**

---

We are a medical device company primarily focused on the design, development and commercialization of continuous glucose monitoring, or CGM, systems for use by people with diabetes and by healthcare providers. We received approval from the United States Food and Drug Administration, or FDA, and commercialized our first product in 2006. We launched our latest generation system, the Dexcom G6<sup>®</sup> integrated Continuous Glucose Monitoring System, or G6, in 2018.

## **II. Product Overview**

---

### **Product Candidates**

#### *Dexcom G7<sup>®</sup>*

We are pursuing regulatory approvals for our next generation G7 CGM system. The G7 is designed with the goal of carrying forward many of the same features as our G6 CGM system and adding several new or improved features, including:

- **Reduced size.** A 60% reduction in size of the on-body wearable.
- **Fully disposable.** Sensor and transmitter combined into a single, disposable wearable.

- **Simple application.** New application process streamlines the number of steps required.
- **Faster warmup.** Warmup period expected to be reduced from the current two-hour warmup for G6.
- **Reduced packaging waste.** Significant reduction to the product packaging waste profile on a per unit basis.

## Products

### Dexcom G6®

In March 2018, we obtained marketing authorization from the FDA for the G6 via the *de novo* process. The G6 was the first type of CGM system permitted by the FDA to be used as part of an integrated system with other compatible medical devices and electronic interfaces, which may include automated insulin dosing systems, insulin pumps, blood glucose meters or other electronic devices used for diabetes management. G6 and substantially equivalent devices of this generic type that may later receive marketing authorization are referred to as integrated continuous glucose monitoring systems, or iCGMs, and have been classified as Class II devices by the FDA. Along with this classification, the FDA established criteria, called special controls, which outline requirements for assuring CGM accuracy, reliability and clinical relevance, and which also describe the type of studies and data required to demonstrate acceptable CGM performance. The G6 is designed to allow our transmitter to run an algorithm to generate a glucose value and to communicate directly to a patient's compatible mobile device, including iPhone®, iPod touch®, iPad®, and certain Android® mobile devices. A patient's glucose data can also be displayed on wearable devices, like the Apple Watch® and Wear OS by Google devices. The G6 transmitter has a labeled useful life of three months. Data from the G6 can be integrated with Dexcom CLARITY®, our cloud-based reporting software, for personalized, easy-to-understand analysis of trends that may improve diabetes management. In the United States, the G6 is covered by Medicare and Medicaid in the majority of states and by commercial insurers, subject to satisfaction of certain eligibility and coverage criteria for individuals with both Type 1 and Type 2 diabetes.

In June 2018, we received Conformité Européenne Marking, or CE Mark, approval for the G6, which allows us to market the system in the European Union and the countries in Asia and Latin America that recognize the CE Mark, as well as New Zealand, though certain countries may require compliance with certain local administrative requirements and/or additional marketing authorizations (for example, the inclusion of medical devices on the Australian Register of Therapeutic Goods in Australia).

In October 2019, we also received marketing authorization from the FDA for the Dexcom G6 Pro, or G6 Pro, which allows healthcare professionals to purchase the G6 for use with their patients. The G6 Pro has many of same features as the G6 and is intended for healthcare professionals to use with their patients ages two years and up. The G6 Pro may be used in a blinded or unblinded mode for up to 10 days.

For the G6, the sensor is inserted by the user and is intended to be used continuously for up to 10 days, after which it may be replaced with a new disposable sensor. Our transmitter is reusable until it reaches the end of its use life. Our receiver is also reusable. As we establish an installed base of customers using our products, we expect to generate an increasing portion of our revenues through recurring sales of our disposable sensors.

The G6 carries forward important features of prior generation Dexcom CGM systems:

- **Continuous glucose readings.** Automatically sends glucose readings to a Dexcom receiver or compatible mobile device every five minutes.
- **Mobile app and sharing.** Compatibility with mobile device applications allows for sharing glucose information with other people for added support and care coordination.
- **Customizable alarms and alerts.** Personalized alert schedule immediately warns the user of pending dangerous high and low blood sugars.

The G6 also has a number of new or improved features compared to our prior generation devices:

- **Finger stick elimination.** No finger sticks are needed for calibration or diabetes treatment decisions, consistent with the instructions for use.
- **Easy sensor application.** Complete redesign of the sensor applicator allows for one-touch, simple self-insertion.

- **Discreet and low profile.** A redesigned transmitter with a 28% lower profile than the previous generation Dexcom CGM system makes the device comfortable and easy to wear under clothing.
- **Medication blocking.** New feature allows for more accurate glucose readings without interference from common medications taken at typical indication doses, such as acetaminophen.
- **Predictive low alert.** New alert feature intended to predict hypoglycemia before it hits to help avoid dangerous low blood sugar events.
- **Extended 10-day disposable sensor.** Up to 10-day sensor use allows for 43% longer wear than previous generation Dexcom CGM systems.

Other than the foregoing, the features of the G6 are generally consistent with our prior generation CGM systems in its technical capabilities and its indications. Since the G6 is classified by the FDA as a Class II device, it is subject to special controls and modifications of, or revisions to, the device may be made under the 510(k) process.

#### *Dexcom ONE®*

In July 2021, we obtained CE Mark approval for our new Dexcom ONE CGM system, or Dexcom ONE, which we have launched in four countries: Bulgaria, Estonia, Latvia and Lithuania. Dexcom ONE consists of three main components: a Dexcom ONE sensor, a Dexcom ONE transmitter, and a Dexcom ONE app as the display device for users with a compatible mobile device. Dexcom ONE carries many of the same features as the G6, and is indicated for persons, including pregnant women, ages 2 years and older. Like our other CGM systems, Dexcom ONE is designed to replace finger stick blood glucose testing for diabetes treatment decisions.

### III. Manufacturing

We currently manufacture our products at our headquarters in San Diego, California and at our manufacturing facility in Mesa, Arizona. We manufacture our current CGM systems with certain components supplied by outside vendors and other components that we manufacture internally. Key components that we manufacture internally include our wire-based sensors. The remaining components and assemblies are purchased from outside vendors. We then assemble, test, package and ship the finished systems, which may include a reusable transmitter, a receiver and disposable sensors.

We purchase certain components and materials used in manufacturing from single sources due to quality considerations, costs or constraints resulting from regulatory or other requirements. As of December 31, 2021, those single sources include suppliers of application-specific integrated circuits used in our transmitters, seals used for the applicator and certain polymers used to synthesize polymeric membranes for our sensors.

### IV. Conflict Minerals Analysis and Reasonable Country of Origin Inquiry

Based upon a review of our products and our Reasonable Country of Origin Inquiry (“RCOI”), we have concluded that:

- our products contain conflict minerals that are necessary to the production or functionality of such products; and
- we are unable to determine whether the conflict minerals present in our products originate in the Covered Countries.

We are therefore required by the Final Rules to file with the SEC a Form SD and a Conflict Minerals Report as an exhibit thereto.

### V. Design of Due Diligence Measures

Dexcom designed its due diligence with respect to the source and chain of custody of the conflict minerals contained in its products based on the five-step framework set forth in the Third Edition of the Organisation for Economic Co-operation and Development’s Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the supplements thereto (the “OECD Guidance”).

## VI. Due Diligence Measures Performed by DexCom

---

Dexcom performed the following due diligence measures in accordance with the OECD Guidance and the Final Rules:

### OECD Guidance Step #1: Establish Strong Company Management Systems

- Dexcom maintains a Conflict Minerals Policy (the “Conflict Minerals Policy”) that sets forth (i) its commitment to complying with the Final Rules, (ii) its expectations of its suppliers regarding supporting Dexcom’s compliance activities, and (iii) its policies and practices with respect to the engagement of suppliers and the implementation of risk mitigation measures. The Conflict Minerals Policy can be found on our website at <https://investors.dexcom.com/corporate-governance>.
- The implementation of Dexcom’s RCOI and the conducting of due diligence on the source and chain of custody of Dexcom’s necessary conflict minerals are managed by Dexcom’s supply chain, finance and legal departments. The Audit Committee (the “Audit Committee”) of our Board of Directors (the “Board”) exercises oversight and review with respect to these processes. To the extent that red flags or other issues are identified in the supplier data acquisition or engagement processes, these issues and red flags will be addressed first by the responsible individuals within the supply chain, finance and legal departments and then subsequently reported to and reviewed by the Audit Committee at regularly scheduled meetings of the Audit Committee on at least an annual basis.
- The supply chain, finance and legal staff responsible for conflict minerals compliance (i) have received training regarding conflict minerals compliance and (ii) are required to be familiar with Dexcom’s Conflict Minerals Policy and with Dexcom’s conflict minerals-related processes and procedures.
- Records of material conflict minerals-related documentation are maintained electronically by Dexcom for a period of five (5) years from the date of creation.
- Dexcom’s existing suppliers have been provided with a copy of the Conflict Minerals Policy, and new suppliers will be provided with a copy of the Conflict Minerals Policy as part of Dexcom’s standard supplier onboarding process. In addition, Dexcom’s form manufacturing agreement contains a conflict minerals compliance provision (the “Conflict Minerals Contractual Provision”) requesting that suppliers (i) comply with the Conflict Minerals Policy and (ii) cooperate with Dexcom in providing the information required by the CMRT (as defined below). Dexcom will request that the Conflict Minerals Contractual Provision be incorporated into (i) new manufacturing agreements and (ii) existing manufacturing agreements when such agreements are negotiated for renewal.
- Interested parties can report improper activities in violation of the Conflict Minerals Policy or the Conflict Minerals Rules via email at [investor-relations@dexcom.com](mailto:investor-relations@dexcom.com). This email address is published on Dexcom’s website at <https://investors.dexcom.com>. All reported activities will be reviewed by the appropriate individuals within the supply chain, finance and legal departments.

### OECD Guidance Step #2: Identify and Assess Risk in the Supply Chain

- Dexcom requests that its suppliers, identified as a result of Dexcom’s RCOI process, complete in full the Responsible Minerals Initiative's (“RMI”) Conflict Minerals Reporting Template (the “CMRT”). The CMRT is used to provide Dexcom with information regarding those suppliers’ practices with respect to the sourcing of conflict minerals to enable it to comply with its requirements under the Final Rules.
- Dexcom’s supply chain, finance and legal departments manage the collection of information reported on the CMRT by its suppliers.
- Dexcom utilizes a series of escalating responses to address the failure of a supplier to provide the information required by the CMRT.

### OECD Guidance Step #3: Design and Implement a Strategy to Respond to Identified Risks

- If, on the basis of red flags that are identified as a result of either (i) the supplier data acquisition or engagement processes or (ii) the receipt of information from other sources, Dexcom determines that

there is a reasonable risk that a supplier is sourcing conflict minerals that are directly or indirectly financing or benefiting armed groups, Dexcom will enforce the Conflict Minerals Policy and the Conflict Minerals Contractual Provision binding such supplier (if any) by means of a series of escalations.

- Such escalations may range from prompt engagement with the supplier to resolve the sourcing issue, to requiring such supplier to implement a risk management plan (which plan may involve, as appropriate, remedial action up to and including disengagement from upstream suppliers), to disengagement by Dexcom from the applicable supplier.

#### **OECD Guidance Step #4: Carry Out Independent Third-Party Audit of Supply Chain Due Diligence at Identified Points in the Supply Chain**

Given that we do not have a direct relationship with the smelters and refiners that process the conflict minerals that are present in our products, we rely on the RMI to conduct third-party audits of smelters and refiners.

#### **OECD Guidance Step #5: Report on Supply Chain Due Diligence**

As required by the Final Rules, we have filed a Form SD and a Conflict Minerals Report as an exhibit thereto for the 2021 reporting year. The Form SD and Conflict Minerals Report are also available on our website at <https://investors.dexcom.com/sec-filings>.

### **VII. Smelters and Refiners Identified**

---

We identified 129 suppliers who fell within the scope of our RCOI based on the type of component or part being supplied and the likelihood that the component or part contained a conflict mineral. We sent the CMRT to those 129 suppliers and received responses from 108 of them. Dexcom's suppliers identified the names of approximately 347 smelters and refiners from which they source conflict minerals that appear on the RMI's Smelter Reference List (the "Smelter Reference List"), and of those smelters and refiners, approximately 236, or approximately 68%, have successfully completed an assessment against the applicable RMI Responsible Minerals Assurance Process ("RMAP") standard or an equivalent cross-recognized standard. With respect to those smelters and refiners appearing on the Smelter Reference List that have not successfully completed an assessment against the applicable RMAP standard or an equivalent cross-recognized assessment (the "Non-Conformant Smelters and Refiners"), although we were not able to determine the mines or locations of origin of the conflict minerals sourced from such smelters and refiners, attached as Addendum A to this CMR is a list of the country locations of such smelters and refiners as reported by our suppliers, grouped according to the specific conflict mineral processed by such smelters and refiners.

### **VIII. Steps to Mitigate Risk**

---

Dexcom intends to take the following steps to mitigate the risk that its necessary conflict minerals benefit armed groups:

- Continue to engage with suppliers to obtain complete CMRTs;
- Encourage the development of supplier capabilities to perform conflict-minerals related due diligence; and
- Provide ongoing training regarding emerging best practices and other relevant topics to supply chain, finance and legal staff responsible for conflict minerals compliance.

### **FORWARD-LOOKING STATEMENTS**

Statements relating to due diligence improvements and certain other statements herein are forward-looking in nature and are based on Dexcom's management's current expectations or beliefs. These forward-looking statements are not purely historical and reflect Dexcom's or its management's intentions, beliefs, expectations and strategies for the future. These forward-looking statements fall within the meaning of the federal securities laws that relate to future events. In some cases, you can identify forward-looking statements by terminology such as "may," "will," "expect," "plan," "anticipate," "believe," "estimate," "intend," "potential" or "continue" or the negative of these terms or other comparable terminology. Forward-looking statements are made as of the date of this report, deal with

future events, are subject to various risks and uncertainties, and actual results could differ materially from those anticipated in those forward-looking statements. The risks and uncertainties that could cause actual results to differ materially are more fully described under “Risk Factors” in our periodic reports filed with the SEC, including without limitation our quarterly report on Form 10-Q for the quarterly period ended March 31, 2022, as filed with the SEC on April 28, 2022. We assume no obligation to update any of the forward-looking statements after the date of this report or to conform these forward-looking statements to actual results.

#### DOCUMENTS INCORPORATED BY REFERENCE

Unless otherwise stated herein, any documents, third party materials or references to websites (including Dexcom’s) are not incorporated by reference in, or considered to be a part of this CMR, unless expressly incorporated by reference herein.

**Addendum A**

**Non-Conformant Smelter and Refiner Country Locations by Conflict Mineral**

<b>Conflict Mineral</b>	<b>Smelter or Refiner Country Location</b>
Gold	UNITED STATES OF AMERICA
	INDIA
	MAURITANIA
	COLOMBIA
	NORWAY
	UNITED ARAB EMIRATES
	GHANA
	UGANDA
	LITHUANIA
	GERMANY
	RUSSIAN FEDERATION
	MALAYSIA
	SOUTH AFRICA
	BELGIUM
	SUDAN
	CHINA
	ZIMBABWE
	NEW ZEALAND
	KOREA, REPUBLIC OF
	SAUDI ARABIA
	KYRGYZSTAN
	KAZAKHSTAN
	MEXICO
	TURKEY
	JAPAN
	TAIWAN, PROVINCE OF CHINA
Tin	SPAIN
	BRAZIL
	INDONESIA
	CHINA
	INDIA
	MYANMAR
	MALAYSIA
	VIET NAM
	RUSSIAN FEDERATION
	CZECHIA
Tungsten	RUSSIAN FEDERATION
	BRAZIL
	CHINA
	KOREA, REPUBLIC OF