

## **California Transparency in Supply Chains Act**

On January 1, 2012, the state of California enacted the California Transparency in Supply Chains Act (the “Act”). The Act requires large retailers and manufacturers doing business in California to disclose on their websites their “efforts to eradicate slavery and human trafficking from their direct supply chain for tangible goods offered for sale.”

At Tandem Diabetes Care, Inc. (“Tandem”), we believe we have a responsibility to source our materials in a legal and ethical manner. As part of the company’s commitment to supply chain transparency, and in compliance with the Act, our efforts to prevent and address slavery and human trafficking in our supply chain are set forth below. As part of our effort to provide transparency, we conduct the following:

### **Verification**

Tandem is working to engage in the verification of its supplier and contract manufacturer supply chain to evaluate and address supplier risks. Preliminary risk assessments are performed by Tandem on potential suppliers with Supplier Qualification Surveys. Upon review of the survey, as determined appropriate, Tandem may follow-up with an in-depth assessment, which may include assessing the risk related to the potential for slavery and human trafficking.

### **Audit**

Tandem’s template supplier agreements require that all products sold to us comply with all codes, standards, and laws. After a top-level supplier is approved, a Supplier Scorecard and ongoing Supplier Performance Evaluations are conducted by Tandem’s Supplier Management Team at scheduled, announced intervals. While the evaluations do not specifically evaluate supplier compliance with company standards for human trafficking and slavery, the evaluations do focus on quality management system compliance and quality performance and are conducted by Tandem. Suppliers are required to follow Supplier Corrective Action Requests, which outline how the supplier will resolve any issues uncovered in an evaluation.

### **Certification**

Tandem’s written supply agreements require a supplier to comply with all applicable laws and provide that products sold to us are manufactured in compliance with applicable national, provincial, state, and local environmental health and safety statutes, acts, ordinances, rules,

codes, standards, and laws. Currently, suppliers are not required to certify that they comply with the anti-slavery and human trafficking laws of the countries in which they do business.

With respect to conflict minerals specifically, Tandem asks direct suppliers who provide parts, components, or materials likely to contain conflict minerals to complete certain conflict mineral reporting. Tandem also provides new suppliers with its Conflict Mineral Policy as part of Tandem's due diligence, as well as includes a "Conflict Minerals compliance provision" in its manufacturing and supply agreements and purchaser order terms.

### **Internal Accountability**

Tandem maintains and enforces internal accountability standards and procedures for employees through the company's Code of Business Conduct and Ethics for Employees and Directors (the "Code"). Specifically, the Code provides that every employee, officer and director who becomes aware of or suspects that unethical or illegal conduct has occurred or is about to occur has a responsibility to report it.

To report a violation of Tandem's Code or of any other company policy, employees, officers, and directors may contact the Compliance Officer by email at [compliance@tandemdiabetes.com](mailto:compliance@tandemdiabetes.com). Anonymous letters may be sent to: Tandem Diabetes Care, Inc., Attn: Compliance Officer, 12400 High Bluff Drive, San Diego, CA 92130. Reports may also be submitted to the EthicsPoint Confidential Ethics Hotline (operated by NAVEX) online at <https://secure.ethicspoint.com/domain/media/en/gui/44972/index.html> or by phone by calling 855-207-2917.

The Compliance Officer may investigate all reported possible Code violations promptly and with the highest degree of confidentiality that is possible under the specific circumstances. All employees, officers, and directors are expected to cooperate with any investigation. In conducting any investigation, the Compliance Officer may consult with outside counsel, the human resources department, and the full Board of Directors or any of its committees, each to the extent deemed necessary by the Compliance Officer

Tandem endeavors to hold suppliers and contract manufacturers accountable through contractual agreements, which outline standards related to slavery and human trafficking. In the case of non-compliance or suspected non-compliance with our policies, Tandem reserves the right to review the specific situation and develop a best possible strategy for resolution.

Tandem may terminate a business relationship if any such standards are not upheld and will consider implementing any appropriate remediation measure.

### **Training**

All Tandem employees are required to comply with Tandem's Code. All Tandem employees, including those who have direct responsibility for overseeing the company's supply chain, participate in annual training on the company's Code to ensure understanding and compliance with the requirements of the Code. This training includes ethical decision making and upholding laws and regulations, but does not specifically relate to slavery and human trafficking. In addition, Tandem maintains a compliance program that conducts audits of certain requirements under the Code and other compliance policies, investigates potential violations and takes disciplinary action when necessary.