

Code of Conduct

OUR COMMITMENT – A MESSAGE FROM THE CEO

At Pharming Group N.V. and its subsidiaries (collectively, "Pharming"), it is our purpose to serve the unserved rare disease patients, bringing these patients globally the solutions for their unmet medical needs. We are committed to go the extra mile every day and to transform the future for our patients so that even more people living with rare diseases can believe in a better tomorrow. This is our commitment at Pharming.

To be successful in delivering on this commitment and be considered as trusted partners by our patients and stakeholders, there is only one way forward: deploying our scientific excellence while applying the highest ethical standards across our entire business, based on our values of integrity, quality, and respect. By making clear choices in the values that our company stands for and to preserve these. By considering the interests of our patients, our clients, our employees, our investors and all other stakeholders in everything we do. By conducting our business with integrity, transparency, quality and respect, collectively and as individual employees, even when it is hard and even when no one is watching. And last-but-not-least, by being well aware of our impact on the environment and our role in society. This is how we do business at Pharming.

Because only that way, we will keep the trust of our patients, clients, healthcare professionals, regulators, investors and the society at large. It will also enable us to develop a clear company identity and to build and foster an inspiring company culture. Within this context, at Pharming, we always place business integrity at the core of our culture and as an essential part of the way we work. We firmly believe that any good business is unreservedly an ethical business, and we demonstrate this in our everyday behavior, as we understand that a robust reputation is essential for any strong successful business today. "We always do the right thing" is part of Pharming's mission for a clear reason. It is also for that same reason that we have adopted the following core values, that will guide us all at Pharming every day in everything we do:

- We care.
- We collaborate.
- We walk the talk.

In addition, Pharming is taking several important steps to embed Environmental, Social and Governance (ESG) principles and practices in our strategy, planning processes and systems to build a sustainable business. This will support the Company's sustainable development, have a positive impact on the environment and society, improve the workplace and the health and well-being of employees, enhance our corporate reputation, strengthen stakeholder engagement, help ensure accountability and transparency, and manage risks and opportunities.

This Code of Conduct (the “Code”), as adopted by the Board of Directors of Pharming and endorsed by all members of the Executive Committee, is a concrete proof of the level of commitment that Pharming expects from all its management, employees, officers, and contractors (“Pharming Personnel”), regardless of their status or level of seniority, when it comes to integrity standards and compliance with the law.

All of us at Pharming are expected to live and breathe this Code of Conduct by conducting our business according to its value and to use it as a precious compass at every decision point. Our leaders and managers of people shall embody the Code and lead by example, acting as role models to all other employees. We commit to enforce this Code effectively. Any violation of this Code may lead to disciplinary action, including reprimands, warnings or termination of employment, in line with the applicable employment laws.

While this Code is a fundamental tool that will help all of us to make the right decision every day, it cannot tell us how to behave at every single decision. Please also note that in some countries, laws, regulations or codes may require standards that are stricter than those in our Code. In such cases, we systematically comply with the strictest rules. Pharming’s policies, procedures and trainings are available to provide additional guidance. If the right choice is still not clear or if further advice is needed, we consult our manager, Business Integrity or any other relevant expert department as indicated in this Code.

At Pharming, we foster an open environment where all employees are free at any moment to seek advice, request help, ask questions or report concerns regarding potential breaches of this Code. In case of concerns, do not hesitate to reach out to your manager, to Human Resources, to Business Integrity, or report your concerns through the Pharming Helpline (including EthicsPoint) or via any other reporting channel available to you locally. All reports are treated with the highest level of care and confidentiality. At Pharming we do not tolerate retaliation against any person acting in good faith.

Together with all members of the Executive Committee, I firmly commit to this Code. I trust and expect that each of you live, breathe, and embody the same commitment. This is who we are at Pharming.

Sijmen de Vries
Chief Executive Officer

WE REJECT CORRUPTION

We believe that corruption has severely detrimental effects on society, on the environment and significantly hinders economic growth.

We clearly and unreservedly commit to conducting business with the highest standards of ethics, integrity, and transparency, based on the merits and the science behind our medicines, unequivocally rejecting any form of corruption.

We prohibit Pharming personnel and third parties from offering, promising, making, authorizing, requesting, agreeing to receive or accepting, directly or indirectly through third-parties or intermediaries, any transfer of value to or from any person or organization, for the purpose of obtaining or retaining business or any undue advantage. We do not engage into any act that may even just give the impression of such unlawful behaviors.

QUESTION: A very important healthcare professional ("HCP") in our disease area has just been appointed as chairman to the new tender committee. In a couple of months, she will be dealing with a major tender in which Pharming will participate. Before we get too close to the tender date, you would like to invite her to two meetings as speaker so that she becomes closer to Pharming and more knowledgeable about our product. Can you do that?

ANSWER: No. you must not use speaker interactions and contracts to strengthen the loyalty of an HCP so that this person will have a more positive attitude towards Pharming when taking important tender decisions. These decisions must be made strictly independently and only in the best interest of patients and of public finances.

REFERENCES

Anticorruption Policy.

WHOM TO CONTACT

Business Integrity.

To report concerns please see section "We Report Concerns".

WE ENDORSE ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) PRINCIPLES

We are committed to integrating environmental, social and governance (ESG) principles into our mission, strategy, and operations, recognizing our impact on the environment and our role in society, as well as the impact of sustainability risks on our business.

We believe that ESG is important for our success, business resiliency and overall health, and that it reflects our values of integrity, quality, and respect.

We are aware of the evolving expectations and standards of our stakeholders, including patients, clients, employees, investors, regulators, and the society at large, regarding ESG issues.

Therefore, we strive to:

- Ensure awareness of employees of ESG topics, such as human rights, anti-bribery, anti-slavery, and environmental protection, and our ESG strategy, policies and practices.
- To the extent applicable, monitor and report on our ESG performance and progress, in compliance with the applicable laws, regulations and codes, as well as the best practices in our industry.
- Engage with our stakeholders on ESG matters, seeking their feedback and input and collaborating with them to address the challenges and opportunities in our field
- Continuously improve our ESG practices and initiatives, by setting clear goals and targets, implementing action plans, and evaluating the outcomes and impacts.

QUESTION: You have completed a training on human rights and anti-slavery, but you still have some questions about how to apply these principles in my daily work. Whom should you contact?

ANSWER: You should contact the ESG Program manager or any other member of the ESG Program Team, who can provide you with further guidance and support on these topics. You can also check the ESG intranet page for an outline of Pharming's ESG Program, updates on the status, the relevant policies and procedures and other information.

QUESTION: How can I share my feedback, suggestions, or concerns on ESG matters?

ANSWER: You can share your feedback, suggestions, or concerns on ESG matters with your manager, the ESG Program Manager or any other member of the ESG Team. You can also use the Pharming Helpline or any other reporting channel available to you locally, to report any ESG-related concerns.

QUESTION: What are some examples of ESG issues that are relevant for our business and industry?

ANSWER: Some examples of ESG issues that are relevant for our business and industry are: the environmental impact of our operations, products and supply chain; the social impact of our research, development and access programs; the governance and ethics of our interactions with stakeholders, such as healthcare professionals, patients, regulators, investors and third parties and the disclosure and reporting of our ESG performance and progress. You are invited to go to our ESG intranet page for an outline of Pharming's ESG Program and the main ESG themes for Pharming.

REFERENCES

Webpage ESG on Intranet
Modern Slavery and Human Trafficking Statement

WHOM TO CONTACT

ESG Program Manager
Manager
To report in accordance with “Alert reporting & Investigations” chapter on the webpage of BI.

WE VALUE OUR THIRD PARTIES

We engage with third parties, such as distributors, vendors, suppliers, agents, intermediaries, and partners, in a variety of capacities.

We may be held accountable for the behavior of our third parties and therefore we select the most appropriate business partners with rigor, using an appropriate Due Diligence tool.

We respect all such third parties and expect all of them to fully comply with the highest ethical standards and all applicable laws, regulations, and codes in the conduct of their business for Pharming, especially as it relates to corruption, antitrust, privacy, quality, human rights, worker's rights, and the protection of the environment. To this effect, we shall have a Third-Party Code applicable to them.

We consider such standards as a critical selection criterion for our relationships with third parties.

We select third parties based on legitimate need for goods and services and apply fair market value rates accordingly.

We perform due diligence on our potential third parties to ensure they have the capability, reputation, and appropriate standards to enter a business relationship with us.

We remain alert for any unusual behavior or alerts regarding any of our third parties that may indicate inappropriate behavior, especially relating to payments and expense reimbursements.

QUESTION: While reviewing the reimbursement request for our distributor's expenses, you noticed an invoice for 10,000 € with a not very clear description of the expense. You trust our distributor and think you should just approve the reimbursement. Is that correct?

ANSWER: No. You must never treat reimbursements as routine operations, to be approved mechanically. You must review such requests attentively and ask questions, seek clarifications, and engage with the third parties accordingly when doubts arise. Reimbursement requests that are vague, like this one, and do not comply with our standards must not be paid.

REFERENCES

Third-Party Management Chapter/ Due Diligence System
Third-Party Policy.

WHOM TO CONTACT

Procurement.
Business Integrity.
Quality.

To report concerns please see section "Alert Reporting & Investigations"

WE ACT WITH FINANCIAL INTEGRITY

We protect the integrity of our cash assets and securities, bank accounts, credit standing and financial records.

We categorically reject any form of fraud.

We maintain accurate books and records that accurately reflect all transactions in accordance with all applicable local and international financial reporting standards.

We manage budgets responsibly.

We comply with applicable accounting controls, financial policies, and guidelines.

QUESTION: A medical association has requested Pharming and other companies for support to help them revamp their website. As you do not have any budget left for grants, you propose to record the funding as a promotional meeting. Is that correct?

ANSWER: No. You must maintain accurate books and records that accurately reflect all transactions in accordance with their nature. A grant is a charitable activity and cannot be reported as a commercial tactic.

REFERENCES

Procedures and rules to be found on the Finance website.
Anticorruption Policy.

WHOM TO CONTACT

Finance.
Business Integrity.
To report concerns please see section “Alert Reporting and Investigations”.

WE EMBRACE FAIR COMPETITION

We act fairly and competitively as we believe in generating open markets which benefit patients and the healthcare system.

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

We compete only based on the merits of our products and our services.

We do not discuss with competitors or agree with them on any information related to pricing, access, medical or marketing strategies, research, terms and conditions, customer data, costs or any other confidential or commercially sensitive information.

We exercise extreme care with our communications at industry association meetings, at conferences and during any other interactions with competitors.

We do not treat our customers, suppliers, or distributors unfairly.

We do not participate in any boycott or other abusive practices.

We comply with all applicable customs, import and export control regulations, trade and economic sanctions, and other trade compliance requirements.

We do not abuse our market position.

QUESTION: What should you do if you are attending a trade association meeting and hear several members discussing their pricing strategy?

ANSWER: you do not participate in the conversation. You raise an objection to the conversation, and you have it included in the minutes of the meeting, where possible. If the objection is not accepted, then you immediately excuse yourself from the meeting and you promptly notify Business Integrity and Legal. If the objection is accepted and the decision is made to continue with the meeting on the other subjects in the agenda, then you may continue to participate in the meeting. However, after the meeting or during a break, you promptly notify Business Integrity and Legal. Discussing these types of matters with competitors may be viewed as price-fixing and can lead to jail sentences, fines, large damage awards and severe collateral consequences.

REFERENCES

Antitrust Policy.

WHOM TO CONTACT

Legal.

Business Integrity.

To report concerns please see section “Alert Reporting and Investigations”.

WE EMBODY DIVERSITY

We embody diversity as an integral part of our culture and are committed to promoting and protecting it in the workplace and beyond.

We comply with all laws, regulations and codes on equality, diversity and the prohibition of discrimination and harassment.

We respect and promote human rights and comply with the principles of the UN Global Compact, with the UN Declaration of Human Rights and with the International Labor Organizations standards on child labor and minimum pay.

We promote a safe workplace with equal opportunities, personal dignity, diversity of views, in which there is not even the appearance of acceptance of harassment or discrimination.

We commit to equal treatment and opportunities for all Pharming Personnel whether in recruitment, employment conditions, development, or career progression, based on transparent, objective and fair criteria.

We categorically prohibit any form of discrimination or harassment, on the basis of race, color, religion, nationality, age, sex, gender identity or expression, sexual orientation, physical or mental disability, physical appearance, genetics, medical or personal condition, marital status, pregnancy, parenthood, political opinion, trade union membership or any other characteristics protected by law.

We severely reject the use of stereotypes, jokes, or any other communication, remark or contact, whether written, verbal or physical, that can even just have the appearance of harassment or discrimination.

QUESTION: You have noticed that one of your direct reports, who is 58 years old and has been with Pharming for 21 years, has started to have performance issues. You have noticed a significant decrease in his ability to drive performance as evidenced by the fact that he frequently misses deadlines on projects. Can you tell him that he has earned “a day in the sun after so many years of hard work” and that he should start thinking about retirement?

ANSWER: No. You would be relying on an impermissible stereotype if you were assuming that the employee’s performance problems were due to his age. Instead, you should provide direct feedback and coaching to the employee on the specific nature of his performance issues.

REFERENCES

Alert Reporting and Investigations Procedure

WHOM TO CONTACT

Human Resources.

Business Integrity.

To report concerns: see section “Alert Reporting and Investigations”

WE PROMOTE A SAFE WORK ENVIRONMENT

We promote a healthy and safe workplace and therefore we commit to protecting the health and safety of everyone in the working environment, both from a physical and psychological perspective. All facilities are designed and maintained to ensure the highest level of safety and welfare for our employees.

We comply with all applicable health and safety laws regulations and codes to ensure the safety and wellbeing of our employees.

We care for our people and integrate health and safety principles into all aspects of our business and of our organization.

We do not put ourselves or others at risk by our actions and for this reason, we take responsibility to maintain an incident-free workplace and we strive to a zero-incident environment across the organization. We promptly report any actual or potential accidents or concerns relating to security, environment, health and safety to the Health & Safety Officer as well as facility and equipment leads.

QUESTION: You tripped over a wire at work and ended up with a cut on your arm. Nothing too bad. You think the cut will heal quickly, and you do not want to impact my office's safety record. The cleaners who left the wire, are scared and anxious that this will impact their reputation. Do you really have to report this?

ANSWER: Yes. Pharming requires to report all workplace accidents, regardless of whether serious or not, so that the events can be treated promptly and appropriately. There is no risk of retaliation when reporting. By reporting it, you help identify potentially dangerous conditions that can be corrected before serious injuries occur and therefore help maintaining a safe working environment for all.

REFERENCES

Health & Safety page on Intranet

WHOM TO CONTACT

Health & Safety Officer

Facility and Equipment Leads

To report concerns please see section ""Alert Reporting and Investigations".

WE AVOID CONFLICTS OF INTERESTS

We avoid any conflict-of-interest situation where the financial, political or personal interests of Pharming Personnel or any of their relatives or friends, as well as their external commitments and relationships, might conflict, or even appear to conflict, with those of Pharming, and would influence the Pharming Personnel in the ability to act in the interest of Pharming.

We make decisions based on the best interest for Pharming and our patients, and we do not use our position in Pharming for our own, our friends' or relatives' advantage.

We are responsible to identify and disclose any situation that presents a potential or actual conflict of interests or creates the appearance of a conflict of interests. If conflicts of interests are not properly identified, disclosed and managed, they can seriously endanger the integrity of our organisation. This is not acceptable at Pharming.

We do not accept or request any fees, compensation, gifts, hospitality, entertainment, services or anything else of value that may affect our judgment when acting in the interest of Pharming.

QUESTION: You are a senior medical employee, in charge of a new and promising clinical development program at Pharming, and you have started the process to select and contract a clinical research organization ("CRO") to conduct such program. Your spouse works for one of the CROs that are applying to support our development program. Should you disclose this activity?

ANSWER: Yes, you must disclose the relationship to Business Integrity. This personal tie may create a financial conflict of interests or at the very least a perception of a conflict of interests. You may be criticized to have chosen that specific CRO to benefit your family and not solely in the interest of Pharming.

REFERENCES

Conflict of Interests Policy.
Anticorruption Policy.

WHOM TO CONTACT

Business Integrity.
To report concerns please see section ""Alert Reporting and Investigations".

WE REJECT INSIDER TRADING

We do not allow trading in stocks or securities based on non-public information such as corporate strategies, strategic partnerships, high-profile litigation, top management changes, mergers and acquisitions or clinical research outcomes.

We comply with all applicable laws, regulations, and codes as well as Pharming's policy on insider trading and the sale and purchase of securities.

We expect the same from our families and friends and we do not provide such information to any other person to trade based on non-public information.

We do not use non-public information that we may have come to know during the course of our role to trade on Pharming's or any company's stocks or securities.

We do not trade shares during blackout periods, including after the non-public information has been formally published.

We have a Disclosure Committee that oversees Pharming's compliance with applicable insider trading regulations, monitors all potential insider information and provides advice on the need for disclosure and for precautionary measures.

QUESTION: You have found out that your assistant is trading in Pharming securities. He knows about the announcements we will make on the new trial results and is using this material non-public information to make personal investments. What should you do?

ANSWER: You should immediately report the matter to the Business Integrity Department without undue delay. You have an obligation to report if you believe that others, especially those subject to your supervision, may be ignoring the rules against insider trading.

REFERENCES

Insider Trading Code.
Related Person Transaction Policy
Disclosure Committee Charter.

WHOM TO CONTACT

Business Integrity Department
Disclosure Committee.
To report concerns please see section ""Alert Reporting and Investigations".

WE VALUE OUR HEALTH STAKEHOLDERS

We always behave with respect, fairness, honesty, and transparency when interacting with our stakeholders such as healthcare professionals, healthcare organizations, payers, patients and their caregivers, and patient organizations (collectively, "Stakeholders").

We fully respect the independence and autonomy of all our Stakeholders.

We cooperate with our Stakeholders to research and develop medicines that meet patients' needs.

We interact with our Stakeholders when there is a legitimate scientific or business need and always in the best interest of patients.

We interact with our Stakeholders to foster scientific information exchange, disease awareness, and information regarding the safe and effective use of medicines, in line with all applicable laws, regulations and codes.

We work with our Stakeholders to obtain their services or insights to focus our activities on what is in the best interest of patients.

We actively listen to patients' needs and views on the impact of their conditions and treatments on their journey.

We provide our Stakeholders factual, objective, and evidence-based scientific information.

We do not provide information to our Stakeholders which is misleading or raises unfounded hopes and we do not use transfers of value such as hospitality, gifts, donations, contracted services, or sponsorships to influence their independence and autonomy.

QUESTION: A new patient organization has been created by several patients and caregivers in your country. You think it would be great to provide them quickly with a grant to ensure that from the onset they perceive Pharming as a partner and feel loyal to us. But when you shared the idea with your manager, she was not in favor. Is your manager right?

ANSWER: Yes, your manager is right. If you provide a grant, or any other transfer of value to any Stakeholder, such as patient organizations, to create loyalty to Pharming, you would be impacting their independence and autonomy, and potentially expose Pharming to corruption and reputation issues.

REFERENCES

Policy: Hospitality to Healthcare Stakeholders.

Policy: Contracting Healthcare Stakeholders.

Policy: Advisory Boards.

Policy: Grants & Donations.

Policy: Individual Sponsorships.

Policy: Sponsorships of Third-Party Activities.

Policy: Patient Organizations.

Anticorruption Policy.

US Field Manual

WHOM TO CONTACT

Business Integrity.

To report concerns please see section “Alert Reporting and Investigations”.

WE PROMOTE RESPONSIBLY

We promote our products, directly or through our partners, in a responsible manner and with the highest ethical standards, in compliance with applicable laws, regulations and codes.

We promote our medicines only once they have obtained regulatory approval and only for the indications approved by the relevant regulators.

We communicate promotional product information, which is fair, balanced, objective, complete, accurate, substantiated, and recent.

QUESTION: As a sales representative, you always look for opportunities to promote our licensed products to HCPs appropriately. You have heard that the data of a clinical trial that have been published at a congress last week might result in a new indication. Can the salesforce already use these new data for promotion?

ANSWER: No, this is not allowed. As a sales representative, you can only provide HCPs with promotional materials and content that have been approved within Pharming for promotional use and that are consistent with the product indications approved by the relevant authorities for your country.

REFERENCES

Materials & Brand Planning
US Field Manual.

WHOM TO CONTACT

Legal
Medical Affairs.
Regulatory Affairs.
Business Integrity.
To report concerns please see section “Alert Reporting and Investigations”

WE RESPECT PRIVACY

We protect the privacy and data of any person we interact with, whether it is our patients, our employees, our customers or our third parties.

We comply with all applicable privacy and data protection laws, regulations, and codes.

We process personal data fairly and lawfully, only for specified, explicit, lawful, and legitimate purposes, as appropriate to the purposes for which they are collected and only for the duration necessary to meet the legitimate purpose.

We comply with the rights of individuals with regards to their personal data. These include the rights to access, rectify, and erase their personal data, along with the rights to restrict and object to processing, the right to notification, the right to data portability, and the right not to be subjected to automated decision-making.

We provide information to the people we interact with about their privacy rights, we facilitate the exercise of said rights, and we handle requests invoking said rights within 30 days.

We only disclose personal data to trusted third parties and transfer them to countries that have been authorized or otherwise mandated by applicable laws. If the countries in question have not been authorized by applicable laws, we make sure that the necessary contractual precautions and steps are taken so that the personal data is protected.

We are committed to never losing control of personal data. But if something were to go wrong, we have a strong data breach procedure to curb, restrain and fix the possible damages as quickly and efficiently as possible.

QUESTION: An agent from our distributor called me to ask for the personal email address of one of our site managers. The agent tells me they already know each other from their soccer club. Can you share the email address with the agent?

ANSWER: No, you must treat all employee personal data strictly confidential. You may, however, contact the site manager, tell this person about the agent's question, and ask her permission to either share the email address with the agent or contact them directly herself.

REFERENCES

Information on Business Integrity Website Chapter "Privacy"

WHOM TO CONTACT

Data Protection Officer.

Corporate Compliance Officer.

To report concerns please see section "Alert Reporting and Investigations"

WE UPHOLD QUALITY AND REPORT ADVERSE EVENTS AND PRODUCT COMPLAINTS

We are committed to protecting the health and safety of the patients and the clinical trial subjects that use our medicines.

We embrace a culture of quality and regulatory compliance for our medicines and services, in order to protect patients and clinical trial subjects.

We comply with the good manufacturing practices, good distribution practices, and local requirements applicable to the supply, manufacturing, packaging, testing, storage, and distribution of our products.

We deploy systems and processes to ensure full traceability of the products and services we provide, including ingredients and raw materials.

We develop, manufacture, and deliver high quality, safe and effective products, and services.

We document what we do and we do what we document in order to ensure the highest quality of our products, services and third-party interactions.

We comply with the global standards of good clinical practices and good pharmacovigilance practices, applicable local regulatory requirements and follow the ethical principles in the Declaration of Helsinki.

We comply with all applicable laws, regulations and codes relating to quality, pharmacovigilance, adverse event reporting and product complaints.

We promptly report, monitor and evaluate adverse events associated with our investigational drugs in clinical trials and our marketed products and take risk mitigation measures as appropriate.

We treat animals respectfully, refining procedures and reducing discomfort and stress as much as possible.

We have animal welfare standards in place, in compliance with the applicable laws, regulations and codes. We carefully and continuously monitor the health and welfare of our animals.

QUESTION: My dentist is also a patient, using a Pharming product. During my last visit, she mentioned that our product is probably causing her rushes and higher blood pressure, but she is unsure it is really linked to our product. Should you report this side effect to PV?

ANSWER: Yes, you must promptly report any adverse events associated with any of our products within 24 hrs. when you become aware of them, regardless of the context.

REFERENCES

Pharmacovigilance website on Intranet.
Quality Assurance website on Intranet

WHOM TO CONTACT

Pharmacovigilance.
Quality Assurance.
To report concerns please see section “Alert Reporting and Investigations”.

WE COMMUNICATE RESPONSIBLY

We believe that a solid image and reputation are vital elements in Pharming's success.

We do not tolerate the inappropriate use of any social media or other communication channels as these can pose risks to Pharming's confidential and proprietary information as well as to our image and reputation.

We respect personal views of Pharming Personnel, but these must be expressed in an individual capacity and never on behalf of Pharming.

We are individually accountable for communicating externally in a responsible manner that always protects Pharming's image and reputation.

We use the traditional media, social media and the internet responsibly, fairly, objectively and in a balanced and respectful manner and we must not speak on Pharming's behalf, disclose confidential information, nor discuss our products or molecules, without permission and permissible communications must only use materials and messages approved for the intended purpose.

We answer questions by the media only if we are authorized to do so. If not, we must refer all media questions to Investor Relations.

We have a Disclosure Committee that oversees the compliance of our corporate communications with laws, regulations and codes, as applicable to listed companies.

QUESTION: Yesterday, you saw that a doctor posted an article about our recent clinical trial results for the new product Pharming is getting ready to launch. As a medical manager, shouldn't you share that post as soon as possible?

ANSWER: No. If you share product related information on social media, especially if related to unapproved indications, you can expose Pharming to a risk of inappropriate product promotion.

REFERENCES

Social Media Policy and Guidelines.

WHOM TO CONTACT

Investor Relations.

Disclosure Committee.

To report concerns please see section "Alert Reporting and Investigations".

WE RESPECT CONFIDENTIALITY

We expect that our assets, resources, and confidential information are treated and used in a responsible and safe manner and that the confidentiality of information is respected.

We have a duty to protect the assets, resources, systems, and infrastructure of Pharming and of our business partners, and to use them in a responsible and appropriate way.

We must protect confidentiality for all sensitive information and business secrets and take all reasonable steps to prevent unauthorized use.

We implement processes to ensure that intellectual property and confidential information are managed and protected adequately to ensure compliance with legal and contractual obligations.

We must not disclose confidential information to others or use it in any way other than for the purpose for which such confidential information has been originally communicated or acquired.

We implement appropriate physical, technical and organizational security measures to maintain confidentiality, integrity and availability of data.

We undertake to protect confidential information against loss or theft, as well as from unauthorized access, unlawful disclosure, copying, use or modification.

QUESTION: You just saw on X that a distributor is discussing a new confidential distribution strategy of Pharming publicly! What should you do?

ANSWER: You immediately refer the matter to Legal. You are responsible to protect Pharming's confidential information.

WHOM TO CONTACT

Legal
Business Integrity
IT

To report concerns please see section "Alert Reporting and Investigations".

WE PROTECT THE ENVIRONMENT

We strongly believe that environmental responsibility is essential to protect the planet and improve efficiency for a sustainable future for all.

We have embedded ESG in our mission and strategy to build a truly sustainable business, recognizing our impact on the environment and our role in society on the one hand and the impact of sustainability risk on our company on the other hand.

We are working to ensure environmental excellence across all our operations, from raw materials to distribution and beyond.

We comply with all applicable environmental laws, regulations, and codes.

We protect the environment by preventing pollution and aim to conserve natural resources.

We aim to reduce our carbon emissions over time which will reduce our impact on the environment.

We design and manufacture products that strive to minimize impact on the environment.
We promote biodiversity at our sites across the globe.

QUESTION: You maintain various manual historic records that have passed their legal retention period. Should you digitalize them to reduce your carbon footprint?

ANSWER: Yes. It is everyone's responsibility to promptly propose improvement to existing processes. Digitalization will help reduce cost and reduce CO2 and provide easier access to information.

WHOM TO CONTACT

Ethics & Compliance Officer.

To report concerns please see section "Alert Reporting & Investigations".

ALERT REPORTING & INVESTIGATIONS

We strongly believe in an open environment where all employees are encouraged at any moment to speak up and report concerns.

We must report all actual or suspected irregularities of a general, operational, or financial nature related to Pharming, including all violations of this Code of Conduct, of Pharming's policies and procedures and of all applicable laws, regulations and codes.

We are encouraged to reach out to our manager, to Human Resources, to Business Integrity or use any other reporting channel available to us locally. We can also report our concerns using the contact details available on the webpage of Alert Reporting & Investigations.

All reports are treated with the highest level of care and professionalism.

Reports can be made anonymous, but you are encouraged to identify yourselves in case more information is needed during the investigation. Confidentiality will be maintained to the extent possible in light of the need to fully investigate reported concerns.

Pharming is committed to a strict non-retaliation policy and will not discharge, demote, suspend, threaten, harass, bully, intimidate or in any manner retaliate against any individual for reporting an alert in good faith, even if the reported actions later turn out to be inaccurate. This includes any retaliation against people and third parties who assist the person making the report (e.g., a family member, a lawyer, a confidential advisor or trade union representative). It also includes those involved in managing and conducting the investigations (e.g., Business Integrity, Legal, Internal Controls). Our confidentiality and privacy rights under the applicable laws will be complied with at all times.

REFERENCES

Alert Reporting & Investigation Procedure.

WHOM TO CONTACT

Business Integrity.
Human Resources
Legal

Version history		
Pharming Code of Conduct		
Version 3 - Changes vs previous version	Bi-annual review, addition ESG principles	August 2024
Owner :	Business Integrity	
Approved by:	ExCo	Executive Board
Date:
