

Business Partner Code of Conduct

Pharming Group N.V.

We value our Business Partners

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 we apply the highest ethical standards across our entire business, based on our values of integrity, quality, and respect. We consider such standards as a critical selection criterion for our relationships with Business Partners.

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

We may be held accountable for the behavior of our Business Partners and therefore we select the most appropriate Business Partners with rigor, applying an appropriate Business Partner management framework.

We respect all our Business Partners 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 Business Partner Code of Conduct applicable to them. Business Partners are expected to adopt this Business Partner Code of Conduct and live up to the expectations that it contains.

Our expectations towards our Business Partners:

Pharming partners reject corruption

- Partners will refrain 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.
- Partners do not engage into any act that may even just give the impression of such unlawful behaviors.

Pharming partners endorse environmental, social and governance (ESG) principles

- Partners are committed to integrating environmental, social and governance (ESG) principles into their business, recognizing their impact on the environment and their role in society, as well as the impact of sustainability risks on their business.

Pharming partners value third parties

- Partners will communicate the requirements contained in the Business Partner Code of Conduct to their own partners and monitor compliance as far as is practical.

Pharming partners act with financial integrity

- Partners categorically reject any form of fraud.
- Partners maintain accurate books and records that accurately reflect all transactions in accordance with all applicable local and international financial reporting standards.

- Partners comply with applicable accounting controls, financial policies, and guidelines.

Pharming partners embrace fair competition

- Partners act fairly and competitively to support open markets which benefit patients and the healthcare system.
- Partners comply with all applicable antitrust and competition laws, regulations, and codes.

Pharming partners strive for a fair and unbiased workplace

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

Pharming partners promote a safe work environment

- Partners comply with all applicable health and safety laws regulations and codes to ensure the safety and wellbeing of their employees.

Pharming partners avoid conflicts of interest

- Partners avoid any conflict-of-interest situation where financial, political, or personal interests might conflict, or even appear to conflict, with those of Pharming.

Pharming partners value health stakeholders

- Partners behave with respect, fairness, honesty, and transparency when interacting with stakeholders such as healthcare professionals, healthcare organizations, payers, patients and their caregivers, and patient organizations.

Pharming partners promote responsibly

- Partners promote our products, in a responsible manner and with the highest ethical standards, in compliance with applicable laws, regulations and codes.
- Partners promote our medicines only once they have obtained regulatory approval and only for the indications approved by the relevant regulators.
- Partners communicate promotional product information, which is fair, balanced, objective, complete, accurate, substantiated, and recent.

Pharming partners respect privacy

- Partners protect the privacy and data of any person they interact with.
- Partners comply with all applicable privacy and data protection laws, regulations, and codes.

Pharming partners uphold quality and report adverse events and product complaints

- Partners are committed to protecting the health and safety of the patients and the clinical trial subjects that use our medicines.
- Partners embrace a culture of quality and regulatory compliance for our medicines and services, in order to protect patients and clinical trial subjects.
- Partners 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.

Pharming partners communicate responsibly

- Partners use the traditional media, social media and the internet responsibly, fairly, objectively and in a balanced and respectful manner and do 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.

Pharming partners respect our assets and proprietary information

- Partners tread and use our assets, resources, and confidential information in a responsible and safe manner and respect the confidentiality of information.

Pharming partners protect the environment

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

Pharming expects all partners to:

- Understand and comply with this Business Partner Code of Conduct and maintain documentation to demonstrate such conformance.
- Operate in compliance with all applicable laws, regulations, guidelines and industry codes, including those applicable for Healthcare Compliance.
- Immediately report to Pharming any gaps in compliance with this Business Partner Code of Conduct.
- Allow Pharming or an authorized delegate to conduct necessary audits related to the content of this Business Partner Code of Conduct.

Pharming is aware that differences in cultures and laws create challenges in applying this Business Partner Code of Conduct globally. This Business Partner Code of Conduct sets out the ethical principles and expectations of Pharming, it is understood that the methods for meeting these expectations may be different and must be consistent with the laws and regulations of the different societies in the world.

By signing this Business Partner Code of Conduct, or by signing a contract to which this Business Partner Code of Conduct has been attached, you agree that this Business Partner Code of Conduct forms part of our contract. If you consistently fail to meet this Business Partner Code of Conduct and cannot agree on, or repeatedly do not deliver on, an improvement plan, we reserve the right to terminate the contract based on such a breach of contract.

Owner, approvers Exceptions and Revision history:

This Policy is Owned by:

Business Integrity

Changes to the policy are signed off by:

Executive Director Corporate &
Healthcare Compliance

Revision Change

01 Newly created