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# Code of Conduct

## OUR COMMITMENT – A MESSAGE FROM THE CEO

At Pharming Group N.V. and its subsidiaries (collectively, "Pharming"), we have made it our mission to develop innovative products for the safe, effective treatment of rare diseases and unmet medical needs. We are committed to go further and 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 at delivering on this commitment and be considered as trusted partners by our patients and stakeholders, there is only one way forward: holding ourselves to the highest ethical standards across our entire business, further than what is required by the law, based on our values of integrity, quality and respect. This is because our ethical reputation, together with our scientific excellence, are the key to deliver this ambitious commitment to patients and stakeholders. This is what we believe in at Pharming.

Ethical and regulatory expectations and scrutiny are increasingly growing in our sector, raising the level of complexity. 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 have the trust of our patients and stakeholders because we conduct our business with integrity, transparency, quality and respect, collectively and as individual employees. We always stand accountable as individual employees, showing patients, healthcare professionals, the authorities and society at large that they can trust our actions as well as our words and that we own business integrity, choosing to do the right thing even when it is hard, even when no one is watching. This is how we own our business at Pharming.

I firmly believe that all of us at Pharming will live and breathe this Code of Conduct (the "Code") by conducting our business according to its value and will use it as a precious compass at every decision point. I also expect our leaders and managers of people to embody the Code and lead by example, acting as role models to all other employees.

I strongly believe in an open environment where all employees are free at any moment to seek advice, request help, ask questions or report concerns. I encourage you to speak up and reach out to Business Integrity or report your concerns through the Pharming Helpline. You have my word that all reports are treated with the highest level of care and confidentiality and that at Pharming we do not tolerate retaliation against any person acting in good faith.

I firmly commit to this Code and 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



## OUR COMMITMENT – A MESSAGE FROM OUR BUSINESS INTEGRITY OFFICER, DIRECTOR CORPORATE SUPPORT AND OUR EXECUTIVE COMMITTEE

Doing the right thing is the right thing to do at Pharming.

This Code, adopted by the board of directors of Pharming Group N.V. (the "Board of Directors"), is a concrete proof of the level of commitment that Pharming expects from all of 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.

It is a fundamental tool in helping us make the right decision every day, but it cannot tell us how to behave at every single decision. 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, Director Corporate Support and Global Business Integrity Officer or any other relevant expert department as indicated in this Code.

We commit to enforce our 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.

In some countries, laws, regulations or codes may require standards that are stricter from those in our Code. In these cases, we systematically comply with the strictest rules.

We are fully committed to the spirit and the letter of this Code and we expect the same commitment from each of you.

Sabine de Saint Aulaire  
Global Business Integrity Officer

Gabrielle Smit  
Director Corporate Support

Executive Committee

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## WE REJECT CORRUPTION

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### OUR COMMITMENT



- 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 comply with all applicable laws, regulations and codes that prohibit any form of corruption, including, but not limited to the Dutch Criminal Code (*Wetboek van Strafrecht*), Dutch Economic Offences Act (*Wet op de Economische Delicten*), the US Foreign Corrupt Practices Act of 1977, as amended (FCPA), the US False Claims Act, the US Anti-Kickback Statute, the UK Bribery Act, the French Laws Sapin 2.
- We prohibit Pharming Personnel 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 give the impression of such unlawful behaviors.

### Q&A



- **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, I would like to invite her to two meetings as speaker so that she becomes closer to Pharming and more knowledgeable about our product. Can I do that?
- **ANSWER:** No. I 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.

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## WE VALUE OUR THIRD PARTIES

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### OUR COMMITMENT



- We engage with third parties, such as distributors, vendors, suppliers, agents, intermediaries and partners, in a variety of capacities.
- 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.
- We consider such standards, policies and activities of our third parties as a critical selection criterion for our relationships.
- We may be held accountable for the behavior of our third parties and therefore we select the most appropriate business partners with rigor.
- We perform due diligence on our potential third parties to ensure they have the capability and reputation to enter into a business relationship with us and that they have demonstrated respect for ethical principles equivalent to those in this Code.
- 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.

### Q&A



- **QUESTION:** While reviewing the reimbursement request for our distributor's expenses, I noticed an invoice for 10,000 € with a not very clear description of the expense. I trust our distributor and I think I should just approve the reimbursement. Am I right?
- **ANSWER:** No. I must never treat reimbursements as routine operations, to be approved mechanically. I 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 and do not comply with our standards must not be paid.

### REFERENCES



- Procedure: Third Party Compliance Program.
- Anticorruption Policy.

### WHOM TO CONTACT



- Finance.
- Business Integrity.

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## WE ACT WITH FINANCIAL INTEGRITY

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### OUR COMMITMENT



- We protect the integrity of our cash assets and securities, bank accounts, credit standing and financial records.
- 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 related to sourcing and purchasing.

### Q&A



- QUESTION: A medical association has requested Pharming and other companies for donations to help them revamp their website. As I do not have any budget left for donations, I will record the funding as a promotional meeting. Am I correct?
- ANSWER: No. I must maintain accurate books and records that accurately reflect all transactions in accordance with their nature. A donation is a charitable activity and cannot be reported as a commercial tactic.

### REFERENCES



- Financial Policies.
- Anticorruption Policy.

### WHOM TO CONTACT



- Finance.
- Business Integrity.

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## WE EMBRACE FAIR COMPETITION

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### OUR COMMITMENT



- We act fairly and competitively as we believe in fair competition generating open markets and benefiting patients and the healthcare system.
- We comply with all applicable antitrust and competition laws, regulations and codes.
- We compete only 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 at industry association meetings or 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.

### Q&A



- **QUESTION:** What should I do if I am attending a trade association meeting and hear several members discussing pricing strategy?
- **ANSWER:** I do not participate in the conversation. I raise an objection to the conversation and I have it included in the minutes of the meeting, where possible. If the objection is not accepted, then I immediately excuse myself from the meeting and I 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 I may continue to participate in the meeting. However, after the meeting or during a break, I 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

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## WE PROMOTE A SAFE WORK ENVIRONMENT

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### OUR COMMITMENT



- We believe in a healthy and safe workplace and therefore we commit to protecting the health and safety of everyone in the working environment.
- We comply with all applicable health and safety laws regulations and codes.
- 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 reduce as much as possible incidents across the organization.
- We promptly report any actual or potential accidents relating to security, environment, health and safety.

### Q&A



- **QUESTION:** I fell in depot area at work and ended up with a cut on my arm. Nothing too bad. I think the cut will heal quickly, and I do not want to impact my office's safety record. The cleaners were very scared and anxious that this would impact their reputation. Do I really have to report this?
- **ANSWER:** Yes. Pharming requires that I report all workplace accidents, regardless of whether it was serious or not, so that the event can be treated promptly and appropriately. By reporting it, I 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 Policy.

### WHOM TO CONTACT



- Health & Safety Officer.



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## WE EMBODY DIVERSITY

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### OUR COMMITMENT



- 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, in the UN Declaration of Human Rights and the International Labor Organizations standards on child labor and minimum pay.
- We promote a 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.

### Q&A



- **QUESTION:** I have noticed that one of my direct reports, who is 58 years old and has been with Pharming for 21 years, has started to have performance issues. I have noticed a significant decrease in his ability to drive performance as evidenced by the fact that he frequently misses deadlines on projects. Can I 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. I would be relying on an impermissible stereotype if I were assuming that the employee’s performance problems were due to his age. Instead, I should provide direct feedback and coaching to the employee on the specific nature of his performance issues.

### REFERENCES



- Diversity Policy

### WHOM TO CONTACT



- Human Resources
- Business Integrity



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## WE AVOID CONFLICTS OF INTERESTS

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### OUR COMMITMENT



- 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 or 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.

### Q&A



- QUESTION: I am a senior medical employee, in charge of a new and promising clinical development program at Pharming, and I have started the process to select and contract a clinical research organization ("CRO") to conduct such program. My spouse works for one of the CROs that are applying to support our development program. Should I disclose this activity?
- ANSWER: Yes, I must disclose it 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. I may be criticized to have chosen that specific CRO to benefit my family and not solely in the interest of Pharming.

### REFERENCES



- Conflict of Interests Policy.
- Board Rules.
- Anticorruption Policy.

### WHOM TO CONTACT



- Business Integrity.

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## WE REJECT INSIDER TRADING

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### OUR COMMITMENT



- 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.

### Q&A



- **QUESTION:** I have found out that my 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 I do?
- **ANSWER:** I should immediately report the matter to the Business Integrity Group without undue delay. I have an obligation to be alert if I believe that others, especially those subject to my supervision, may be ignoring the rules against insider trading.

### REFERENCES



- Insider Code.

### WHOM TO CONTACT



- Business Integrity.

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## WE VALUE OUR HEALTH STAKEHOLDERS

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### OUR COMMITMENT



- We always behave with respect, fairness, honesty and transparency when interacting with our stakeholders such as HCPs, healthcare organizations, payers, patients and patient organizations (collectively, "Stakeholders").
- We fully respect the independence and autonomy of 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 and awareness about diseases and the 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 better construct and deploy our activities in the interest of patients.
- We 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 impact their independence and autonomy.

### Q&A



- **QUESTION:** A new patient organization has been created by several patients and carers in my country. I think it would be great to provide them quickly with a donation to ensure that from the onset they perceive Pharming as a partner, and they feel loyal to us. But when I shared the idea with my manager, she was not in favor. Is my manager right?
- **ANSWER:** Yes, my manager is right. If I provide a donation, or any other transfer of value to Stakeholders such as patient organizations to create loyalty to Pharming, I would be impacting their independence and potentially expose Pharming to severe compliance issues.

### REFERENCES



- Policy: Hospitality to Healthcare Stakeholders.
- Policy: Contracting Healthcare Stakeholders.
- Policy: Advisory Boards.
- Policy: Donations.
- Policy: Individual Sponsorships.
- Policy: Sponsorships of Third-Party Activities.
- Policy: Patient Organizations.
- Anticorruption Policy.

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## WHOM TO CONTACT



- Business Integrity.

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## WE PROMOTE RESPONSIBLY

### OUR COMMITMENT



- 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.
- We approve promotional materials prior to their use under the applicable Pharming procedures.

### Q&A



- **QUESTION:** As a sales representative, I always look for opportunities to promote our products to HCPs appropriately. I have heard that the new clinical trial results about a new indication of the product I work with have been published at a congress last week. As the data is outside of the approved indication, it is not for me as a member of the sales force to promote this information. Am I right?
- **ANSWER:** Yes. As a sales representative, I 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 my country.

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### REFERENCES



- Policy: Promotional Compliance.
- Promotional Review Committee Procedure.

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### WHOM TO CONTACT



- Medical.
- Business Integrity.

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## WE RESPECT PRIVACY

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### OUR COMMITMENT



- We protect the privacy and data of any person we interact with, whether employees or 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 to access their personal data.
- We only disclose personal data to trusted third parties and transfer them to countries that have been authorized or otherwise mandated by applicable laws.

### Q&A



- **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 I share the number with the agent?
- **ANSWER:** No, I must treat all employee personal data as strictly confidential. I may, however, contact the site manager, tell this person about the agent's question and let them choose whether to share the email address with the agent or contact them directly.

### REFERENCES



- Privacy Policy

### WHOM TO CONTACT



- Business Integrity

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## WE UPHOLD QUALITY

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### OUR COMMITMENT



- We embrace a culture of quality and regulatory compliance for our medicines and services, in order to protect patients.
- We comply with all applicable laws, regulations and codes relating to quality, pharmacovigilance, adverse event reporting and product complaints.
- We develop, manufacture and deliver high quality, safe and effective products and services.
- We monitor and evaluate adverse events associated with our investigational drugs in clinical trials and our marketed products.
- We are committed to protecting the health and safety of our patients and those who participate in our clinical trials.
- 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 treat animals respectfully, with pain and stress minimized. Pharming's transgenic technology involves animals and thus animal safety and animal welfare are crucial. We have an Animal Code of Conduct in place, which focuses on the strict regulatory control of transgenic materials and animals in regard to the environment. Special attention is given to the strict separation of transgenic and non-transgenic materials and animals. In addition, we follow strict procedures to prevent the prohibited release of transgenic animals, their semen or any other reproductive transgenic material into nature.
- Our business is largely dependent on transgenic animals and highly values animal health and welfare. We follow our Animal Welfare Policy which, amongst others, imposes that Pharming will not develop products with unacceptable adverse effects on animal health and welfare. We carefully and continuously monitor the health and welfare of our animals.
- We comply with the good manufacturing practices, good distribution practices, and 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 of ingredients and raw materials.

### Q&A



- **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. Shall I report it anyway?
- **ANSWER:** Yes, I must promptly report any adverse events or medical events associated with any of our products when I become aware of them, regardless of the context.

### REFERENCES



- Pharmacovigilance Policy.

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WHOM TO  
CONTACT



- Pharmacovigilance.



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## WE COMMUNICATE RESPONSIBLY

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### OUR COMMITMENT



- We believe that a solid image and reputation are vital ingredients in Pharming's success.
- We do not tolerate the inappropriate use of 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.
- We answer questions by the media only if we are authorized to do so. If not, we must refer all media questions to Internal & External Communications.

### Q&A



- QUESTION: Yesterday, I 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 I share that post as soon as possible?
- ANSWER: No. Sharing product related information on social media, especially if related to unapproved indications, can expose Pharming to significant compliance issues.

### REFERENCES



- (Social) Media Policies

### WHOM TO CONTACT



- Internal & External Communications.

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## WE RESPECT CONFIDENTIALITY

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### OUR COMMITMENT



- 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 its 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.

### Q&A



- QUESTION: I just saw on Twitter that a distributor is discussing a new confidential distribution strategy of Pharming publicly! What shall I do?
- ANSWER: I immediately refer the matter to Business Integrity. I am responsible to protect Pharming's confidential information.

### REFERENCES



### WHOM TO CONTACT



- Legal.
- Business Integrity.
- IT.

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## WE PROTECT THE ENVIRONMENT

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### OUR COMMITMENT



- We strongly believe that environmental responsibility is essential to protect the planet and improve efficiency for a sustainable future for all.
- We are committed to ensuring 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 fight to conserve natural resources.
- We work 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 wherever we can at our sites across the globe.

### Q&A



- QUESTION: I was walking through the site and noticed paint had been poured into a grate and potentially into the river. Do I have any responsibility to report this?
- ANSWER: Yes. It is my responsibility to promptly report situations that could reasonably result in harm to the environment.

### REFERENCES



### WHOM TO CONTACT



- Corporate Social Responsibility.

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## WE REPORT CONCERNS

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### OUR COMMITMENT



- 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 Business Integrity to report our violation concerns through the [Intranet](#). In case you cannot reach the Intranet, see contact details below:
  - Phone: +31(0)71 524 710 / +1 (844) 701-6378 in the United States
  - Email: [alert@pharming.com](mailto:alert@pharming.com)
  - Postal address: Attn. Business Integrity Department, Vondellaan 47, 2332 AA Leiden, The Netherlands.
- All reports are treated with the highest level of care and professionalism.
- We can make anonymous reports, but we are encouraged to identify ourselves 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 will not discharge, demote, suspend, threaten, harass or in any manner retaliate against any Pharming Personnel for reporting a concern in good faith.
- Our confidentiality and privacy rights under the applicable laws will be complied with at all times.

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### REFERENCES




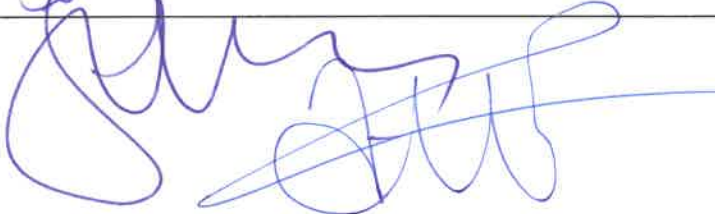
- Alert Reporting Procedure.

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### WHOM TO CONTACT



- Business Integrity.

AUTHORITY	SIGNATURE
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<b>Approver:</b> <b>Sijmen DE VRIES (CEO)</b>  <b>Anne-Marie DE GROOT (Sr. Vice President Organisational Development)</b>	
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