

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 at 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, further than what is required by the law, 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 own our 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.

Evaluating a company's performance in the field of Environmental, Social and Governance (ESG) is considered to be a good indicator of its success, business resiliency and overall health. Regulatory sustainability reporting standards are being implemented to require listed companies to publish their ESG reporting. However, rather than seeing ESG only as a regulatory obligation, 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.

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. It is also for that 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.

All of us at Pharming are expected to live and breathe this Code of Conduct (the "Code") 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.

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. 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 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.

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 THE 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 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, Business Integrity or any other relevant expert department as indicated in this Code.

We commit to enforce this, 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 than those in our Code. In such 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.

The Executive Committee

WE REJECT CORRUPTION

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 national and international laws, regulations and codes that prohibit any form of corruption and bribery and promote transparency.
- 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.

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

WE VALUE OUR THIRD PARTIES

OUR COMMITMENT



- 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.
- 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.

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, like this one, and do not comply with our standards must not be paid.

REFERENCES



- Third Party Compliance Program Procedure.
- Anticorruption Policy.
- Policies in supply relationship management.

WHOM TO CONTACT



- Procurement.
- Business Integrity.
- Supply Relationship Management.
- Quality.
- To report concerns please see section "We Report Concerns".

WE ACT WITH FINANCIAL INTEGRITY

OUR COMMITMENT



- 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.

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.
- Anti-Fraud Policy.

WHOM TO CONTACT



- Finance.
- Business Integrity.
- To report concerns please see section “We Report Concerns”.

WE EMBRACE FAIR COMPETITION

OUR COMMITMENT



- 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.

Q&A



- QUESTION: What should I do if I am attending a trade association meeting and hear several members discussing their 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.
- To report concerns please see section “We Report Concerns”.

WE EMBODY DIVERSITY

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, 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.

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.
- To report concerns please see section “We Report Concerns”.

WE PROMOTE A SAFE WORK ENVIRONMENT

OUR COMMITMENT



- 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.

Q&A



- QUESTION: I fell in a 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 serious or not, so that the events can be treated promptly and appropriately. There is no risk of retaliation when reporting. 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.
- Facility and Equipment Leads.
- To report concerns please see section "We Report Concerns".

WE AVOID CONFLICTS OF INTERESTS

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

WE REJECT INSIDER TRADING

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.
- 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.

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 Corporate Compliance Officer without undue delay. I have an obligation to report if I believe that others, especially those subject to my supervision, may be ignoring the rules against insider trading.

REFERENCES



- Insider Code.
- Disclosure Committee Charter.

WHOM TO CONTACT



- Corporate Compliance Officer.
- Disclosure Committee.
- To report concerns please see section "We Report Concerns".

WE VALUE OUR HEALTH STAKEHOLDERS

OUR COMMITMENT



- 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.

Q&A



- QUESTION: A new patient organization has been created by several patients and caregivers 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 any Stakeholder, such as patient organizations, to create loyalty to Pharming, I 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: Donations.
 - Policy: Individual Sponsorships.
 - Policy: Sponsorships of Third-Party Activities.
 - Policy: Patient Organizations.
 - Anticorruption Policy.
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WHOM TO CONTACT



- Business Integrity.
 - To report concerns please see section “We Report Concerns”.
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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 licensed 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.

REFERENCES



- Policy: Promotional Compliance.
- US Field Manual.

WHOM TO CONTACT



- Medical Affairs.
- Regulatory Affairs.
- Business Integrity.
- To report concerns please see section “We Report Concerns”.

WE RESPECT PRIVACY

OUR COMMITMENT



- 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.

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 email address 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



- GDPR Guidelines.
- Record on Processing Activities on Privacy Perfect.

WHOM TO CONTACT



- Data Protection Officer.
- Privacy Officer.
- To report concerns please see section "We Report Concerns".

WE UPHOLD QUALITY

OUR COMMITMENT



- 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.

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.
- Quality Manual.

WHOM TO CONTACT



- Pharmacovigilance.
- Quality Assurance.
- To report concerns please see section “We Report Concerns”.

WE COMMUNICATE RESPONSIBLY

OUR COMMITMENT



- 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.
- 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.

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. If I share product related information on social media, especially if related to unapproved indications, I can expose Pharming to a risk of inappropriate product promotion.

REFERENCES



- Social Media Guidelines.
- Disclosure Committee Charter.

WHOM TO CONTACT



- Investor Relations.
- Disclosure Committee.
- To report concerns please see section "We Report Concerns".

WE RESPECT CONFIDENTIALITY

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 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 Legal. I am responsible to protect Pharming's confidential information.

WHOM TO CONTACT



- Legal.
 - Business Integrity.
 - IT.
 - To report concerns please see section "We Report Concerns".
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WE PROTECT THE ENVIRONMENT

OUR COMMITMENT



- 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.

Q&A



- QUESTION: I maintain various manual historic records that have passed their legal retention period. Should I digitalize them to reduce my carbon footprint?
- ANSWER: Yes. It is my 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 “We Report Concerns”.

WE REPORT CONCERNS

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 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 below:
 - Phone: +31(0)71 524 7109 / +1 (844) 701-6378 in the United States
 - Email: alert@pharming.com
 - Postal address: Pharming Group N.V., 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.

REFERENCES



- Alert Reporting & Investigation Procedure.

WHOM TO CONTACT



- Business Integrity.
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