

Investor Dialogue Policy

Pharming Group N.V.

Owner and point of contact	Approver	Approval date	Version	Valid until
Investor Relations	Board of Directors	05NOV2025	2	05NOV2027

1. INTRODUCTION

The Pharming Group N.V. (“Pharming” or “the Company”) Investor Dialogue Policy provides guidelines to maintain an active dialogue with our investors (including shareholders).

2. INVESTOR DIALOGUE

The Company endorses the importance of dialogue and regular interaction between the Company and its investors (including shareholders) regarding the Company’s strategy, performance, governance, and sustainability, while avoiding selective disclosure. We strive to build a continuous process of interaction and dialogue between Pharming and its investors, allowing Pharming to hear, understand and respond to their interests, expectations, questions, and concerns. We encourage investors to share their opinions and views with us.

2.1. *General Meetings of Shareholders*

Investors who are shareholders are encouraged to attend and exercise their voting rights at General Meetings of Shareholders of the Company. The board of directors of the Company (the “Board”) shall provide the General Meeting with information requested by the General Meeting, unless this would be inconsistent with an overriding interest of the Company. If the Board decides not to provide information requested by the General Meeting, they shall communicate the motivation for their decision to the General Meeting.

2.2. *Investor Dialogue Outside General Meetings*

Circumstances may occur when Investor Dialogue taking place outside a General Meeting could be conducive to the interests of the Company and its business. The Company may initiate Investor Dialogue or engage in Investor Dialogue initiated or requested by one or more investors.

Such Investor Dialogue may take place via conferences, analyst and investor meetings, conference calls, phone calls, events such as capital markets days, webcasts and email.

2.3. *Responsibility to Engage in Investor Dialogue*

Pharming reserves the right to decide whether to accommodate or accept requests or invitations to enter Investor Dialogue with specific investors, or to accommodate or accept such requests or invitations under certain conditions. Pharming may exclude topics that are price-sensitive or not yet publicly disclosed and reject these requests or invitations if it is of the opinion that this dialogue is not in the best interests of the Company. The Company shall be free (i) to reject a request for Investor Dialogue, (ii) to terminate Investor Dialogue at any point in time, and (iii) not to initiate Investor Dialogue.

In order to enable the Company to assess whether Investor Dialogue initiated or requested by one or more investors could be in the Company's best interests, the Company may request such investor(s) to provide the Company in advance, and in writing, with all relevant information regarding the purpose of the Investor Dialogue so requested (including the topic(s) of such Investor Dialogue), and the views of such investor(s) on the matters to be discussed during such Investor Dialogue.

Pharming observes a silent period, as determined by the Board, prior to the public release of its financial results, during which it refrains from engaging in Investor Dialogue related to financial performance, outlook, or other price-sensitive topics. The silent period is aligned with applicable regulations.

2.4. *Company Representatives*

To the extent possible and practicable, the Company shall be represented by at least one member of the Executive Committee of the Company or of the Board (or another individual designated by the Board) in any Investor Dialogue.

The Company may involve its Investor Relations department in any Investor Dialogue, as well as such other officers of the Company and/or advisors as the Company deems appropriate.

2.5. *Board Updates*

The Executive Director shall regularly (and at least annually) inform and consult the Non-Executive Directors on the process and content of any relevant Investor Dialogue.

3. OTHER PROVISIONS

3.1. *Amendments and Deviations*

Investor Relations is the owner of the Investor Dialogue Policy document. The Investor Relations department initiates and coordinates the biennial evaluation of this Policy, in preparation for the review and approval of the updated version by the Executive Committee, Audit Committee and Board of Directors.

Pursuant to a resolution to that effect, the Board may amend or supplement this policy and allow temporary deviations from this policy, subject to ongoing compliance with applicable law and stock exchange requirements.

3.2. *Governing law and Jurisdiction*

This policy shall be governed by and shall be construed in accordance with the laws of the Netherlands. Any dispute arising in connection with this policy shall be submitted to the exclusive jurisdiction of the competent court in Amsterdam, the Netherlands.