

POLICY ON BILATERAL CONTACTS
NOXXON Pharma N.V.

1. INTRODUCTION

This policy of NOXXON Pharma N.V. (the "Company") in respect of bilateral contacts with (potential) investors and shareholders has been established in accordance with best practice provision 4.2.2 of the Dutch Corporate Governance Code (*Policy on Bilateral Contracts*) and has been adopted by the Board of Directors on 28 September 2017 and approved by the Supervisory Board on 28 September 2017.

2. CONTACTS WITH (POTENTIAL) INVESTORS AND SHAREHOLDERS

- 2.1 It is the Company's policy to simultaneously and equally inform its potential and existing shareholders and other relevant parties in the financial markets, such as analysts and the financial press, about material developments, including matters that may potentially influence the Company's share price. The Company encourages and recognizes the importance of communication with the investment community. Communications with (potential) investors and shareholders and industry analysts are actively managed by the Company occasionally also supported by its appointed Investor Relations agencies. Contacts shall in principle be conducted by the CEO and/or CMO and when practical accompanied by a representative of Investor Relations.
- 2.2 The Company is committed to maintaining an open and constructive dialogue with its (potential) investors and shareholders and industry analysts. Conversations with its (potential) investors and shareholders, both in the Company's general meetings and on a bilateral basis, form an integral part of this dialogue.
- 2.3 The Company will take into consideration all requests from (potential) investors and shareholders and industry analysts to enter into a conversation. The Company will assess such requests and agree to them for those situations where the Board of Directors or the Supervisory Board deems this in the Company's interest. The Company may decide not to accommodate or accept any requests or invitations to enter into a dialogue with (potential) investors or shareholders or industry analysts, or to accommodate or accept such request or invitation under certain conditions. The initiative to enter into a conversation with a (potential) investor or shareholder or industry analysts can also be taken by the Company.
- 2.4 In order to assess whether a conversation with (potential) investors or shareholders or industry analysts could be in the Company's interest, the Company may request (potential) investors or shareholders to provide certain (written) information. This information may include the purpose of the conversation, the matters to be discussed, the opinion of the (potential) investor or shareholder on these matters and information in respect of the (potential) investor or shareholder and its interest in the Company.
- 2.5 The Company might participate in industry conferences. These events are announced in advance on the Company's website, and presentation materials are made available on the website. This is in accordance with the applicable regulatory requirements intended to ensure that all shareholders and other market participants may have equal and simultaneous access to information that could potentially influence the price of the Company's securities.
- 2.6 From time to time, the Company may engage in (bilateral) communication with (potential) investors or shareholders. For a (potential) investor or shareholder the purpose of such one-on-

one or group meeting often is to get a more thorough understanding of the Company's business. (Bilateral) meetings with (potential) investors or shareholders will not be held during (i) closed periods (as defined above) or (ii) possibly additional periods due to specific circumstances. Where possible, at each conversation with shareholders at least two of the Company representatives should be present or one Company representative and one representative from the Company's appointed IR agency.

3. GENERAL PROVISIONS

- 3.1 The Company is committed to provide clear, accurate and timely information to all shareholders in compliance with the applicable rules and regulations, in particular those concerning selective disclosure and inside information.
- 3.2 Briefings on the Company's annual and semi-annual results are disclosed through a press release on the Company's website. Reports and any presentations on these results are published on this website.
- 3.3 The Company is committed to adhering to its legal obligations relating to confidentiality and the disclosure of inside information and strives to only disclose publicly available information in bilateral contacts. In the unlikely event of a release of inside information during the Company's bilateral contacts with shareholders or other market participants, the Company will ensure that such information is immediately made generally and publicly available if and as required, and in accordance with applicable law.

4. MISCELLANEOUS

A copy of this Policy is published on the Company's website (www.noxxon.com). This Policy may be amended by the Board of Directors, with the approval of the Supervisory Board. This Policy is governed by the laws of the Netherlands.