



## POLICY ON BILATERAL CONTACTS WITH SHAREHOLDERS

as approved by the board of directors of argenx SE on  
26 October 2021

### 1. INTRODUCTION

argenx SE (the “**Company**”) has adopted a policy regarding bilateral contacts with shareholders on 11 July 2014, which policy has been amended by the board of directors of the Company (the “**Board**”) on 26 October 2021 to align the policy with section 4.2.2 of the Dutch Corporate Governance Code and to comply with the United States federal securities laws (the “**Policy**”). The policy is distributed and applicable to all of the Company’s directors, officers, employees and consultants (collectively, the Company Employees). The Policy, which is a component of the Company’s overall disclosure controls and procedures, will be evaluated from time to time and may be revised as necessary.

The Company is continuously striving to improve relations with its shareholders. The Company is committed to maintaining an open and constructive dialogue with its shareholders and potential shareholders. Conversations with shareholders, even outside the context of a formal general meeting, are deemed to be useful for both investors and the Company. In addition to communicating with its shareholders at the annual general meeting and, as applicable, during extraordinary general meetings, the Company elaborates on its financial results during (public) conference calls, which are widely accessible. It publishes informative annual and interim reports and press releases, and informs investors via its website. The Company is strict in its compliance with applicable rules and regulations on fair and non-selective disclosure and equal treatment of shareholders.

### 2. MEETINGS AND PRESENTATIONS

From time to time, the Company communicates with shareholders via roadshows. The Company may also participate in broker conferences and the Company announces in advance on the Company’s website the participation in events which are being webcast to the public. It is the Company’s policy to post presentations to analysts and shareholders on its website. These meetings and presentations in principle do not take place shortly before the publication of annual and interim financial information.

### 3. BILATERAL CONTACTS WITH SHAREHOLDERS

The Company may, at its discretion, engage in bilateral contacts with shareholders. These contacts take place either at the initiative of the Company or at the initiative of shareholders.

The Company is generally represented by its investor relations representatives during these interactions. However, in certain circumstances the chief executive officer (the CEO) may lead the discussion with shareholders, sometimes accompanied by the chief financial officer and/or other members of the company’s management. A request of a shareholder to meet with one or more members of the Board shall be assessed by the CEO, with the exception of matters that relate to the integrity of the CEO or a (potential) situation of a conflict of interest, in which case the assessment will be referred to the chairperson of the Board.

The investor relations representatives will determine at their sole discretion whether to accept invitations to engage in bilateral contacts with shareholders and reserve the right to accept invitations only for those conversations where the Board deems this in the Company’s interest.

It is the policy of the Company that only [the CEO, the VP Investor Relations and any persons authorized by (one of) the aforementioned persons specifically] (individually, an Authorized Person and collectively, the Authorized Persons) are authorized to have substantive discussions about any aspect of the Company’s business, or speak on behalf of the Company. Where feasible, at least one representative of the Company, in addition to the Authorized Person, should be present at such calls or meetings. Company Employees who are not Authorized Persons may not disclose or discuss any information about the Company or its activities with any person outside the Company, except as may be required in connection with the proper performance by the employee of his or her duties on behalf of the Company.



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The Company can request shareholders to provide certain written information in order to assess whether a conversation outside a general meeting would be in the interest of the Company. This information can include the objectives of the conversation, the matters to be discussed and the shareholder's view on these matters, the shareholder's interest (both long and short positions in the Company) and/or further clarification of the shareholder's views, objectives and investment intentions.

### 4. INSIDE INFORMATION

The Company is committed to providing high quality, 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.

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 event that inside information is inadvertently disclosed during any bilateral contact, the Company will publicly announce such information in accordance with applicable law.

### 5. MISCELLANEOUS

For any further information or questions with respect to this Policy, please contact the Company's VP Investor Relations, Beth DelGiaccio via [bdelgiaccio@argenx.com](mailto:bdelgiaccio@argenx.com).

A copy of this Policy is published on the Company's website ([www.argenx.com](http://www.argenx.com)). This Policy may be amended by a resolution of the Board. Any amendments will be published on the Company's website.

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