

novocure®



code of  
conduct





Our company began with a patient-forward approach that continues to drive our mission today. We believe we are only beginning.



## A LETTER FROM OUR CEO

Integrity is a commitment that must guide our behaviors beyond mere compliance with laws and regulations, driving us to make the right choice when facing any situation.

Dear Colleagues,

At Novocure, we are committed to our patient-forward mission: Together with our patients, we strive to extend survival in some of the most aggressive forms of cancer by developing and commercializing our innovative therapy. We are guided by our core values: innovation, focus, drive, courage, trust and empathy. We are inspired by the resilience of patients and strengthened by our heritage.

To build and sustain a successful business, we must consistently act with integrity. Integrity is a commitment that must guide our behaviors beyond mere compliance with laws and regulations, driving us to make the right choice when facing any situation.

Novocure's Code of Conduct contains principles that guide us. Each of us needs to know, understand and apply these principles in our daily work, regardless of our function or level in the company. The Code of Conduct, in combination with our Company Policies and Procedures, is meant to support each employee so that we can remain true to our commitments to people, patients, doctors, scientists, partners, investors and society at large.

Each of us has to bring Novocure's Code of Conduct to life. I thank you for your continued support and dedication to patients. They inspire us not only to pioneer, but to act with integrity.

Yours truly,



Asaf Danziger  
Chief Executive Officer



# from day one forward

Aspiring to make a difference in cancer, from day one

## innovation

---

Our founders created a different way to fight cancer. We channel that founding spirit into our science, business and patient relationships to deliver innovative and proven solutions designed to advance cancer care.

## focus

---

We dream big. But we also know that in order to achieve our aspirations, we must be intentional every day in how we spend our time, energy and resources.

## drive

---

Patients and their families are the heart of our mission. Our passion for making a difference in the lives of cancer patients fuels us in our day-to-day work and guides us in our decision-making.

## courage

---

It takes courage to innovate. We stand alongside our patients and stand up for them by challenging the status quo.

## trust

---

Our patients trust us as an integral part of their cancer care team. We trust ourselves and our colleagues to act with integrity and accountability as we use our individual strengths to work together efficiently and effectively in pursuit of our patient-forward mission.

## empathy

---

Confronting cancer is physically, mentally and emotionally challenging. We put ourselves in the shoes of our patients, their families, health care providers, researchers and our colleagues as we strive to change the way cancer is treated.

# TABLE OF CONTENTS

## focus

Ethics in Action . . . . .	1
What is the Code of Conduct? . . . . .	1
Who Is Covered by the Code of Conduct? . . . . .	1
Who are Our Stakeholders? . . . . .	2

## courage

Our Commitment to Compliance . . . . .	3
Novocure’s Compliance Program . . . . .	3
Compliance with Laws, Regulations and Standards . . . . .	3
Asking Questions and Raising Concerns . . . . .	3
Protection from Retaliation . . . . .	4
Investigations and Corrective Action . . . . .	5

## trust

Our Work Environment . . . . .	7
Ethical Business Behavior . . . . .	7
Health and Safety . . . . .	7
Treating Each Other with Respect . . . . .	8
Employee Privacy . . . . .	10

## innovation and drive

Our Relationship with the Company and Shareholders . . . . .	11
Conflicts of Interest . . . . .	11
Gifts and Favors . . . . .	12
Confidentiality, Intellectual Property and Work Product Ownership . . . . .	12
Company Property . . . . .	14
Systems . . . . .	14
Social Media . . . . .	15
Insider Trading . . . . .	15
Books and Recordkeeping . . . . .	16
Records Management . . . . .	17
Investor, Media and Public Inquiries . . . . .	17
Political Activities and Contributions . . . . .	17

## empathy

Our Interactions with Third Parties, Customers and Regulators . . . . .	19
Fair Dealings . . . . .	19
Competitive Information . . . . .	19
Healthcare Laws and Regulatory Requirements . . . . .	19
Interactions with Health Care Professionals and Patients . . . . .	20
Advertising / Marketing . . . . .	21
Patient Privacy . . . . .	21
Patient Safety . . . . .	21
Clinical Research . . . . .	22
Regulatory Affairs . . . . .	22
Quality Assurance . . . . .	22
Anti-corruption . . . . .	23
Antitrust and Competition Laws . . . . .	24
International Business . . . . .	24
Communication with Government Agencies . . . . .	25

## appendix

Revision History . . . . .	26
----------------------------	----







# focus

## ETHICS IN ACTION

Doing the right thing in today's business environment is not always easy. Healthcare laws and regulations change and situations involving ethics can be complicated. While our commitment and our responsibilities are clear, sometimes it is difficult to know what to do in certain situations.

No matter where we conduct our individual work, following the laws, regulations and Company policies in the countries where we do business is not only required, but is also critical to advancing our patient-forward mission, for our success and for our reputation. Our reputation is a valuable Company asset earned through the behavior of employees past and present. We all have a responsibility to maintain and enhance this legacy through our daily interactions.

That is why we have developed this Code of Conduct, to help you exercise good judgment and make informed choices for the Company, for our patients and customers and for yourself.

### What is the Code of Conduct?

This Code of Conduct provides a foundation of principles that may guide you in making ethical business decisions in your daily activities. Company policies and procedures supplement this Code of Conduct and provide specific functional requirements based on local laws and regulations. Employees must maintain familiarity, and conduct themselves in accordance, with all policies established at Novocure, including this Code of Conduct.

Failure to comply with any aspect of this Code of Conduct and complimentary policies may lead to disciplinary action up to and including termination.

*Please refer to relevant policies housed in Master Control for more information on any of these topics.*

### Who Is Covered by the Code of Conduct?

The high standards of ethical conduct reflected in our Code of Conduct apply to all of us. This includes employees, officers, directors and anyone conducting business on Novocure's behalf, such as contractors, consultants and distributors. We represent our Company wherever we operate and must reflect our Company's ethical standards in every aspect of our work life, amongst all of our stakeholders.

**How can the Code of Conduct apply to all employees when laws are different region to region?**

*The Code of Conduct provides principles upon which we can frame our daily activities in an ethical manner. Employees must perform their job duties in compliance with relevant Company policies and local and global laws. It is each employee's responsibility to ask questions and seek guidance.*



## Who are Our Stakeholders?

### *Patients, Healthcare Professionals and Customers*

Patients and their healthcare professionals and caregivers, are the foundation of our business. We strive to make products of unsurpassed reliability, quality and value. We dedicate our energy and resources so that patients around the world can have access to them. We communicate honestly, maintain ethical standards and respond promptly to questions, concerns and issues. We also safeguard sensitive patient and customer information.

### *Our Company and Our Employees*

We hold ourselves accountable to each other. Our Company's vision, mission and values can only be achieved when we work together to create and maintain a healthy and safe working environment where we can provide our therapy to our patients. We do this, in part, through mutual respect, appreciation and trust. Working within this framework allows each of us the opportunity for personal and professional satisfaction while maximizing our strength as an organization.

### *Our Shareholders*

We seek to provide a fair return profit to our shareholders. As stewards of our Company's resources, we must make job-based decisions with Novocure's best interests in mind. We have a responsibility to ensure that our Company's books and records are accurate, that the information we learn while performing our work is used properly and that we treat these Company assets with great care. We also have a responsibility to ensure that those who do business on our behalf share our commitment to following our standards for business integrity.

### *The Government*

Our industry is dynamic and highly regulated by governments worldwide. Government Regulators work to protect the health and safety of their citizens and the integrity of their markets by enforcing appropriate laws and regulations. We fulfill our vision, mission and values and maintain our position as the trusted market leader when we follow the spirit and letter of all applicable laws and regulations and supporting Company policies everywhere we work.



# courage

## OUR COMMITMENT TO COMPLIANCE

We are all responsible for acting with integrity in our daily activities and taking personal ownership of compliance. Your individual commitment to upholding this responsibility and holding each other accountable for such responsibility is essential to Novocure's reputation and ultimate success. At Novocure, we believe what we achieve is as important as how we achieve it.

*Please contact the Compliance Department if you have any questions and/or refer to the Company's separate Compliance Policies beginning with "CMP" for more information.*

### Novocure's Compliance Program

Novocure's Compliance program proactively identifies and remediates risk, and through a variety of activities supports legal and ethical conduct throughout the Company. The Chief Compliance Officer is responsible for overseeing the administration and implementation of Novocure's Global Compliance program. Our Global Compliance program is built on the seven elements of an effective compliance program including: compliance oversight, policies and procedures, training, auditing and monitoring, effective lines of communication, investigations and corrective action.

*Please contact the Compliance Department for more information at [compliance@novocure.com](mailto:compliance@novocure.com) or [complianceEMEA@novocure.com](mailto:complianceEMEA@novocure.com).*

### Compliance with Laws, Regulations and Standards

We live and work in a global environment and face a number of laws and regulations governing our industry's operations. These laws and regulations have a direct impact on our daily work. They also govern our interactions with our stakeholders. We are committed to upholding the letter and spirit of these laws and regulations wherever we do business.

Everywhere we operate, we must be aware of and comply with laws and regulations that govern our business activities. Since we operate in many different countries and jurisdictions, it may seem as if there is a conflict between applicable laws, but it may easily be resolved by contacting the Compliance or Legal Departments.

*Please contact the Compliance or Legal Departments for more information.*

### Asking Questions and Raising Concerns

We believe that acting with integrity means always being truthful, accountable and doing the right thing. We work in a very complex environment where we may encounter situations with unclear or conflicting goals.

---

**I was recently called into my manager's office for violating policies laid out in the Code of Conduct. I was unaware that I had violated any policies and, in turn, do not think I should be held responsible. Can I be held accountable even though I was unaware of the requirement?**

*Yes. As an employee, you are expected to know and follow our policies, including the Code of Conduct, and to know when to ask for clarification of something you do not understand.*

---

**My department sets various goals that we are asked to achieve. Sometimes I feel pressured to violate the Code of Conduct to achieve these goals. Is this acceptable?**

*No. While successful businesses set high goals and employees strive to achieve them, you should never violate the Code of Conduct or our policies to achieve goals.*

---

**I discussed a concern with my manager, and she said she would look into it but nothing has happened. Several weeks have passed, and the situation that caused my concern is still occurring. I am afraid to ask my manager again. What should I do?**

*You should continue to raise your concern until it has been addressed. In this situation, you should consider contacting your manager, Compliance, Human Resources, the Integrity Hotline or one of the other resources listed in the Code of Conduct. While it is possible that your manager looked into the situation and determined that there was not a problem, it would be helpful for you to know, one way or the other.*

---

**I'm a manager and I'm not clear what my obligations are. What if someone comes to me with an accusation involving a senior leader?**

*No matter who the allegation involves, you must report it without exception. The Company provides several avenues for reporting concerns. If for any reason you are uncomfortable making a report to a particular person, you may contact the Integrity Hotline or talk to any of the other resources listed in the Code of Conduct or another member of management.*

---

**What if someone misuses the Integrity Hotline, makes an anonymous call and falsely accuses someone of wrongdoing?**

*Novocure has a robust process for responding to reports. Novocure does not make decisions affecting an employee's status solely on the basis of a report. Each report made in good faith will be investigated completely. If it is found a report is made in bad faith it may be disregarded and the reporter may face disciplinary action.*

---

**I confidentially reported a concern to senior leadership regarding my manager. Lately, my manager has been re-assigning my projects to other team members and has been giving me the silent treatment. I think she may know about my report and is retaliating against me.**

*If you believe you are experiencing retaliation for reporting your concern, you should immediately contact Human Resources, Legal or Compliance Departments. Novocure will not tolerate retaliation against any employee who seeks advice, raises a concern or reports suspected misconduct in "good faith".*

Anytime you have questions about whether an action is lawful or complies with our Code of Conduct, seek advice and ask questions.

If you believe that you have observed or experienced any conduct that violates this Code of Conduct or any other Company policies, you may bring your concerns to the attention of management immediately in any of the following ways:

Reports may be made, in no specific order, to:

- Direct or indirect line management
- Senior Executives
- Human Resources
- Compliance and or Legal Departments
- Integrity Hotline

You are not obligated to report to your manager first if you do not feel comfortable doing so. You may report to any of the individual groups listed above or use the Integrity Hotline.

The Integrity Hotline is a toll free number/web portal where employees or third parties may make reports (by phone or in writing) regarding actual or potential violations of Company standards, laws, regulations, rules or other ethical issues. The Integrity Hotline may be accessed through the Novocure.com website:

- <https://secure.ethicspoint.com/domain/media/en/gui/68414/index.html>

You may make a report in writing using this link or obtain access to the toll free number to make a live report in your local language.

The Company treats all reports confidentially to every extent possible, consistent with reasonable investigation and appropriate action.

*Please contact the Compliance or Human Resources Departments or refer to the Reporting Allegations of Misconduct Policy - CMP-POL-012 for more information.*

## Protection from Retaliation

Novocure does not tolerate retaliation against fellow employees who make good faith reports of possible violations of this Code of Conduct or other Company policy, or for cooperating in an investigation of a report. Retaliatory conduct includes discharge, demotion, suspension, threats, harassment, acting in bad faith and any other manner of discrimination in the terms and conditions of employment because of any lawful act you may have performed. The Company takes allegations of retaliation very seriously and will actively investigate any actual or threatened act of retaliation.

*Please contact the Compliance, Legal or Human Resources Departments or refer to the Reporting Allegations of Misconduct Policy - CMP-POL-012 for more information.*



## Investigations and Corrective Action

All reports of alleged misconduct are taken seriously. Each report is reviewed to confirm whether further investigation is warranted and to determine the appropriate response. Investigators strive to conduct each case with impartiality, competence, honesty, fairness, timeliness, thoroughness and confidentiality. Novocure respects the rights of all parties involved in potential misconduct and will handle all reports with discretion. When possible, based on legal restrictions, the Company will share with you whether your reported issue requires an investigation and whether it was resolved.

Confidentiality will be maintained throughout the investigatory process to the extent possible to achieve adequate investigation and appropriate corrective action.

If the investigation reveals that inappropriate conduct has occurred, management will take prompt and effective remedial action. Such measures are designed to put an immediate stop to any such conduct as well as to prevent such conduct from reoccurring.

Therefore, management retains the right to take whatever action it believes appropriate under the circumstances, which may include disciplinary action up to and including termination of the employment of the offending person.

If the employee making a complaint is not satisfied with how a complaint investigation is handled or resolved, the employee has the right to appeal to the General Counsel, or a member of the Executive Leadership Team.

*Please contact the Compliance Department or refer to the Reporting Allegations of Misconduct Policy - CMP-POL-012 for more information.*









# trust

## OUR WORK ENVIRONMENT

### Ethical Business Behavior

Novocure is committed to maintaining a work environment in which we can be productive and perform at a high level. This environment is best promoted when employees conduct themselves in an ethical and businesslike manner at all times.

The Code of Conduct establishes the standards of conduct that we will be expected to exhibit toward fellow employees, vendors, customers and the general public. These standards combined with other policies and practices should be used as guidelines for expected behavior. Each employee's actions and behavior have an impact on our Company's overall performance. Failure to demonstrate expected behavior could potentially lead to loss of business or otherwise negatively impact the Company and may be subject to disciplinary action including termination of employment.

### Health and Safety

We are committed to a safe and healthy work environment. Employees must comply with all applicable laws relating to health and safety in the workplace, observe and follow safe policies and practices and report any injury or accident at work promptly. Our success depends upon maintaining a safe and healthy environment for all employees. This includes working in an environment that is inclusive and free from harassment, violence and substance abuse.

*Please contact the Human Resources Department for more information.*

### *Employee Well-being*

Our Company invests in our personal and professional growth. Our physical and emotional wellbeing affects the health of our work environment and is important to Novocure's success. Supporting our wellbeing is fundamental to our Company's vision, mission and values. Employee wellbeing means, in part, that we each feel valued as a contributor and have a sense of belonging within our Company. It means that we get timely and honest feedback about our work and our professional development. Novocure maintains high standards of fairness and respect, supporting individuals through a wide variety of services.

### *Working Environment*

The health and safety of all employees and protection of our environment is a top priority in all of our locations. We must constantly strive to prevent workplace injuries, illnesses and environmental releases by:

- Following all applicable environmental, health and safety laws and regulations;

---

**I've noticed some practices in my work area that don't seem safe. Who can I speak to?**

*Discuss your concerns with your manager or the Human Resources Department.*

- reporting, tracking and developing corrective and preventive actions;
- conducting ourselves in a safe and responsible manner;
- taking all reasonable precautions when handling hazardous or unsafe materials, and when operating machinery and equipment; and
- working to continuously reduce workplace hazards and environmental impacts.

*You should promptly report any safety, health or environmental violations or concerns to the Human Resources Department.*

### ***Drug-free and Alcohol-free Workplace***

We are dedicated to maintaining a drug and alcohol free workplace. Accordingly, employees are prohibited from engaging in the unlawful manufacture, distribution, sale, possession or use of illegal narcotics, drugs or controlled substances or the unauthorized use of alcohol while conducting Novocure business or on Novocure premises (e.g., land, property, buildings, structures, installations, parking lots and means of transportation owned by or leased to Novocure or otherwise being utilized for Novocure business and private vehicles parked on Novocure premises).

Employees may not report to work or work while under the influence of alcohol, illegal narcotics, drugs or other controlled substances, except if the controlled substances are taken pursuant to the instructions of a licensed health care provider. Employees may not consume alcohol or use drugs, illegal narcotics or other prohibited controlled substances during working hours, including during meal and break periods. This does not include the authorized use of alcohol at Company-sponsored functions or activities. Employees should refrain from work activities if the use of legal/prescribed substances or medications physically impairs your abilities. (e.g., drowsiness as a side effect of medication).

### ***Violence in the Workplace***

We are committed to preventing workplace violence and to maintaining a safe work environment. We treat all people with courtesy and respect at all times.

Any instances of violence must be reported to the Human Resources Department. All complaints will be fully investigated.

### ***Environmental Sustainability***

We recognize the critical interdependence between human health and the environment, and our inherent responsibility to continually strive to improve the welfare of our employees, our communities and our environment. Where possible, we are committed to:

- conserving natural resources;
- reducing greenhouse gas emissions;
- eliminating waste;
- reusing and recycling materials;
- purchasing environmentally preferable products; and
- enhancing sustainability during new building construction and facility modifications.

## **Treating Each Other with Respect**

We are committed to maintaining a work environment in which all individuals are treated with respect and dignity. Although each region has specific laws that define harassment differently, fundamentally we believe that each individual should be able to work in a professional atmosphere



that promotes equal employment opportunities and prohibits discrimination or harassment of any kind based upon an employee or job applicant's race, color, religion, national origin, ancestry, age, physical or mental disability, gender, sexual orientation, pregnancy, genetic information, veteran status or any other characteristic protected by law. This prohibition of discriminatory acts includes (but is not limited to) any aspects of employment including recruiting, job assignment, promotion, remuneration, training and benefits.

*Please refer to the Policy Against Discrimination and Harassment - HR-POL-US-019 as applicable and/or contact the Human Resources Department for more information.*

### **Harassment**

Novocure strictly prohibits any harassment on the basis of any protected characteristic. Harassment includes verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of employee or job applicant's race, color, religion, national origin, ancestry, age, physical or mental disability, gender, sexual orientation, pregnancy, genetic information, veteran status or any other characteristic protected by law, and that: (i) has the purpose or effect of creating an intimidating, hostile or offensive work environment (ii) has the purpose or effect of unreasonably interfering with an individual's work performance or (iii) otherwise adversely affects an individual's employment opportunities.

Examples of harassing conduct include, but are not limited to: epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes and display or circulation in the workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group (including through e-mail).

### **Sexual Harassment**

Sexual harassment is illegal in many countries, but there may be certain legal differences depending on the country in which you reside. Therefore, you should refer to all relevant Novocure policies and local law regarding sexual harassment that applies to your office location.

Generally, sexual harassment includes unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature. Sexual harassment may include a range of subtle and not so subtle behaviors and may involve individuals of the same gender or different genders. Depending on the circumstances, these behaviors may include, but are not limited to: unwanted sexual advances or requests for sexual favors; sexual jokes and innuendos; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, catcalls or touching; insulting or obscene comments or gestures; display or circulation in the workplace of sexually suggestive objects or pictures (including through e-mail); and other physical, verbal or visual conduct of a sexual nature. Gender-based harassment, harassment not involving sexual activity or language (e.g., male manager yells only at female employees and not males), may also constitute discrimination if it is severe or pervasive and directed at employees because of their gender.

---

**One of my co-workers sends emails containing jokes and derogatory comments about certain nationalities. They make me uncomfortable, but no one else has spoken up about them. What should I do?**

*You should notify your manager or any of the resources listed in this Code of Conduct. Sending such jokes violates our values and our policies regarding our use of email and our standards promoting inclusion and preventing harassment and discrimination.*

---

**While on a business trip, a colleague of mine repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. I asked her to stop, but she wouldn't. We weren't in the office and it was 'after hours' so I wasn't sure what I should do. Is it harassment?**

*This type of conduct is not tolerated, not only during working hours, but in all work-related situations including business trips. You have asked your colleague to stop, which is the first step. Tell your colleague such actions are inappropriate and must be stopped, and if they continue you need to report the problem to the Human Resources Department.*

---

**I need to promote a member of my team to replace someone who just retired. Since John is 50 and nearing retirement age and Maria is only 35 and may stay with Novocure for many years, I feel like it would be wise to promote Maria. Is this a good employment decision?**

*No. You are making this decision in part on the basis of age. This discriminatory practice is illegal, contrary to our values and never acceptable. As a leader, you are modeling the wrong behavior and putting his position and the Company at risk.*

## ***Equal Employment Opportunity and Inclusion***

We value the richness and true innovation that comes from having a diverse and inclusive global workforce. We achieve success and innovate when we capitalize on our differing perspectives, backgrounds and experiences. Our Company encourages the open sharing of ideas and the respectful communication of problems in order to better serve our stakeholders.

Novocure is an equal opportunity employer and follows a policy of administering all employment decisions and personnel actions without regard to race, color, religion, sex, age, national origin, ancestry, disability, pregnancy, sexual orientation, genetic information or any other protected characteristic as established by law.

Further, consistent with applicable legal obligations, Novocure will make reasonable accommodations for qualified individuals with disabilities. The Company similarly makes reasonable accommodations of religious beliefs and practices in accordance with applicable legal obligations.

*Any employee who needs a reasonable accommodation should contact the Human Resources Department.*

## ***Reporting Incidents of Discrimination and/or Harassment***

If you have encountered conduct you believe is contrary to this policy against discrimination and/or harassment you are encouraged to report to the Human Resources Department or via the other reporting channels outlined in the previous section.

We are committed to responding quickly and effectively to any internal reports of harassment, discrimination or retaliation and encourage all employees to come forward and allow the Company to pursue an investigation and resolution of any such matter internally.

## **Employee Privacy**

We respect and protect the confidentiality of all prospective, current or former employees' personal information. If your work involves handling such information then:

- Know and follow the standards for access, use, transmission, storage and disposal of employee personal information.
- Limit access to this information to authorized persons with a legitimate business need.

The Human Resources Department maintains a personnel file for each employee, which is kept confidential by the Company with access only provided on an as-necessary basis. Personnel files contain hiring, personal and job-performance information. An employee who submits a written request will be provided, normally within five business days of such request, with an opportunity to review his or her personnel record on Company premises during normal business hours or with a copy of his or her personnel record. Based on where you live, you may also have additional rights when it comes to your personal information.

*Please contact the Privacy Officer or Human Resources Department for more information.*

---

**I'm concerned that the Company may have medical information about me that I wouldn't want others to have access to. Is my medical information secure and protected?**

*Yes. All medical and health-related information about employees, such as information from our group health plan, is considered strictly confidential and is secured accordingly.*



# innovation and drive

## OUR RELATIONSHIP WITH THE COMPANY AND SHAREHOLDERS

### Conflicts of Interest

We conduct business according to the highest ethical standards of conduct. Business dealings that create or appear to create a conflict between the interests of the Company and the personal interests of an employee are unacceptable. A conflict of interest occurs when you find yourself in a position where your interests may conflict with the interests of the Company (e.g., an employee would benefit financially if a particular vendor is selected to perform services for Novocure) or have an adverse effect on your motivation or the proper performance of your job at the Company.

**I am having trouble covering my personal expenses and have been thinking of getting a second job. I found a job consulting in an area in which I work now for a company that is not in any way a competitor. I would work for this company off hours. Can I do this?**

*You should disclose the new job opportunity to your manager, Legal, Compliance and the Human Resources Department to determine whether there is a conflict and how best to handle it. The important thing is for the employee to disclose the potential conflict to Novocure, so the Company may help the employee work through the issues, and manage any potential conflicts.*



The Company recognizes our right to engage in activities outside of our employment which are private in nature and unrelated to our business. However, you must disclose any possible conflicts so that the Company may assess and prevent conflicts of interest from arising.

You or your immediate family may not own or hold any significant interest in a supplier, customer or competitor of the Company, except where such ownership or interest consists of not more than 5% of the securities in a publicly-owned company and those securities are regularly traded on the stock market.

You must promptly disclose actual or potential conflicts of interest, in writing, to Human Resources and Compliance. Approval of the action or relationship creating the actual or potential conflict will not be given unless the Company determines that your action or relationship will not interfere with your duties or damage the Company.

*Please refer to the Global Conflicts of Interest Policy - CMP-POL-028 or contact the Human Resources or Compliance Departments for more information.*

---

**I am a Medical Science Liaison, and often work with an Healthcare Professional whose employer is a government public hospital. The holidays are approaching and I would like to send the HCP a gift basket filled with three bottles of wine and a wide variety of chocolates. Is this permitted?**

*You should refrain from sending the gift because it is not educational in nature, is considerable in value and gifts to government employees/ representatives are not permitted without prior approval from the Compliance Department.*

## Gifts and Favors

We will not place ourselves under an actual or apparent obligation to anyone by accepting or giving gifts or favors that are intended – or appear to be intended – to influence business judgment. Gifts and favors may include: services that are either unpaid or where the charge is below fair market value.

We do not solicit or accept gifts of significant value, as determined by local standards, lavish entertainment or other benefits from potential and actual customers, suppliers or competitors without the approval of their manager. Special care must be taken to avoid even the appearance of a conflict of interest. You may provide modest meals to customers, patients and healthcare professionals in accordance with relevant Compliance policies.

We will never offer or give gifts or favors intended for the personal use of an individual or employee or an agent of another corporation, organization or government in return for specific favorable business decisions or treatment. Similarly, you must not accept gifts or favors under such circumstances.

*Please contact the Legal or Compliance Departments for more information.*

## Confidentiality, Intellectual Property and Work Product Ownership

### *Intellectual Property*

Our Company's intellectual property is one of our most valuable assets, and we substantially invest in its development. We protect our Company's intellectual property by obtaining patent, trademark or trade secret protection, and by taking precautions to prevent inappropriate disclosure, use or loss of such information. We vigorously enforce our rights to these assets. Likewise, we respect the intellectual property rights of others.

Intellectual property includes patents, trade secrets, trademarks, copyrights, design rights, trade dress, logos, know how, photos/videos, individuals' names and likenesses and other intangible industrial or commercial property.

*Please contact the Legal Department for more information.*

### **Proprietary Information**

Information concerning our business activities is often confidential and key to maintaining our competitive advantage. Disclosure of confidential information outside Novocure could seriously damage our Company's interests. Therefore, safeguarding our Company's information is a responsibility we all share. As with all of our confidential information, we must:

- ensure conversations are not overheard;
- secure sensitive documents; and
- protect mobile, handheld devices from theft and loss and never leave them unattended.

Confidential information is information that is not generally known or readily available to others. This includes technical know-how and data, trade secrets, business plans, marketing and sales programs and sales figures, as well as information relating to mergers and acquisitions, stock splits, divestitures, licensing activities and changes in senior management. Proprietary information should be shared internally only to other employees who need to know the information in order to perform their jobs effectively. Additionally, proprietary information provided to third parties should be carefully considered and only provided as is absolutely necessary for the third party to perform a service.

*Please contact the Legal or Investor Relations Departments for more information.*

### **Work Product**

Novocure retains legal ownership of any work product that you create. No work product created while employed by the Company can be claimed, construed or presented as your property, even after employment by the Company has been terminated or the relevant project completed. This includes written and electronic documents, audio and video recordings, system code, business and research plans, clinical trial data and correspondence with regulatory authorities, and also any concepts, ideas, inventions, discoveries, improvements, methods, copyrightable subject matter or other intellectual property developed for the Company, or that arises out of your work for the Company or from information received regarding the business of the Company, regardless of whether the intellectual property is actually used by the Company. Novocure retains ownership regardless of the equipment used to develop such work product (e.g., personal lap top vs. Company issued).

Employees are also subject to the confidentiality and work product provisions of their employment agreement or any other individual contract.

*Please contact the Human Resources or Legal Departments for more information.*

---

**I recently spoke to the Product Development team and learned they have a lot of great ideas for future products. Am I allowed to talk about these things with my friends and family?**

*No. This could put our ability to patent these products at risk. Our Intellectual Property must be protected from early release to the public.*

---

**I overheard two employees talking loudly about sales figures that would be released to the public tomorrow. Is this appropriate?**

*No. Employees must use caution when discussing confidential business in public places or open work spaces.*

---

**My manager has tasked me with an immediate deadline that will require me to work from home. Can I send work-related materials to and from my personal email account in order to access this information outside of work?**

*No. Company information should not be sent or uploaded to non Novocure information systems such as personal email services. Instead, you should utilize the VPN to work remotely and access documents stored within the Novocure environment.*

---

**My brother sends e-mails to my work computer and sometimes calls me on my Company cell phone. Is this acceptable?**

*Novocure systems are Company property and generally should be used only for business activities. Though occasional and reasonable personal use is permitted, you must exercise good judgment. Your personal use should be consistent with our Code of Conduct and Company policies and procedures, and not interfere with your work. Remember that whenever you send a message from your Company e-mail account, recipients may assume that you are speaking for the Company. Do not send messages with a defamatory or inappropriate tone, or content that would not reflect well on the Company if made public. Think carefully about how your messages may be interpreted by others.*

---

**I make plans for lunch and chat with my Novocure colleagues through WhatsApp. Can I also discuss Novocure related business with them through WhatsApp?**

*No. WhatsApp is not a Novocure System—therefore any use of WhatsApp for business related purposes is prohibited.*

## Company Property

The assets we use to perform our work — our workplace, materials, equipment and third-party service providers — are to be used for appropriate business purposes. The Company provides these assets to us so that we can perform our jobs. We each have a responsibility to protect these assets from theft, loss, misuse and waste. You may need to use Company equipment, such as computers or the telephone, for occasional personal communications. Such use is permitted, as long as it is minimal, does not interfere with your work performance, does not create a conflict of interest and does not result in a significant cost to the Company.

Generally, no Novocure-related information or property (e.g., documents, files, records, computer files, equipment and office supplies) may be removed from Company premises (this includes home offices) without prior authorization.

If your employment is terminated, you must return all Novocure-related information and property that you have in your possession.

Company property may also include our device. Should an employee become aware that a device has gone missing or been stolen, notify the Legal Department immediately.

*Please contact the IT Department or refer to the Acceptable Use Policy - LEG-POL-002 "for more information.*

## Systems

Computers, equipment, computer files, servers, networks, email, voice and fax systems (collectively the "Systems") and software furnished to employees, are Company property intended for business use.

You may need to use Company equipment, such as computers or the telephone, for occasional personal communications. Such use is permitted, as long as it is minimal, does not interfere with your work performance, does not create a conflict of interest, and does not result in a significant cost to the Company.

Please be aware that:

- systems are limited to business use and, consistent with applicable law, the Company may monitor, intercept or review employee use of the Systems;
- all files or data stored on the Systems are Novocure property and subject to Company review;
- use of inappropriate language or images in electronic transmissions on the Systems is prohibited; and
- systems are only to be accessed by authorized individuals.

Novocure-related information or property may only be transferred and stored electronically using official Novocure Systems. Employees are prohibited from using personal email addresses, file storage/transfer tools (e.g., Dropbox, Google Drive), or messaging systems (e.g., WhatsApp) to exchange and/or store Novocure-related information or property. Doing so constitutes an unauthorized removal of Novocure-related information or property from Company premises.

*Please contact the IT Department or refer to the Acceptable Use Policy - LEG-POL-002 for more information.*



## Social Media

Our use of social media should be responsible, ethical and appropriate. Social media is a public resource and only non-confidential information about our Company may be posted. When using social media, always consider any information posted online as permanent — even if you later delete or retract it.

There are legal and reputational risks that arise when posting material both during working and non-working time. Specific rules associated with Social Media usage may be found in the Social Media Policy. But generally, you should refrain from using personal social media during work hours. After work hours, you may only repost Company approved social media posts on your personal social media accounts without edits or substantive comments, and never create new material related to the Company.

*Please contact the Legal Department or refer to the Social Media Policy - HR-POL-US-017 for more information.*

## Insider Trading

Countries worldwide have enacted laws that prohibit trading securities based on insider information. Insider information is information that is material and either not in the public domain or not available to the public. This means information that has not yet been released to the public and is likely to affect the decision of a reasonable investor. From time to time, each of us may have access to material, non-public information about our Company (such as unreleased business performance data) or other business partners. We cannot purchase, sell, or donate securities (including derivative securities such as options) based on this information. Nor can we make any recommendations or discuss such information with others outside our Company. This is considered insider tipping and violates insider trading laws.

*Please contact the Investor Relations or Legal Departments or refer to the Insider Trading Policy - LEG-POL-012 for more information.*

**I am aware of a new development in our business that I think is going to significantly increase the value of the Company's stock. I know that I am prohibited from buying stock, but I can recommend that my friend invest in our Company, right?**

*No. You are correct that you may not trade in Company stock with this information, as it is "material non-public information." Trading in Company stock while in possession of this type of information is insider trading and against the law. However, you are also forbidden by Company policy and the law from making any recommendations to others to buy or sell Company stock based on this type of information, even if you do not share that information when making the recommendation. Doing so would be considered "tipping" and could subject both you and your friend to civil and criminal penalties.*





At the end of a reporting period, my manager asked me to record additional expenses even though the related work has not yet started. I agreed to do it, mostly because I didn't think it really made a difference since we were all sure that the work would be completed in the next quarter. Did I do the right thing?

*No. Costs must be recorded in the period in which they are incurred. The work was not started and the costs were not incurred by the date you recorded the transaction. That is a misrepresentation and, depending on the circumstances, could amount to fraud.*

## Books and Recordkeeping

Our shareholders depend on our honesty and integrity, particularly when measuring the financial performance or strength of our Company. It is crucial that we maintain ethical and honest accounting practices at all times. This includes all aspects of our financial activities: how we spend, transact, report, document and comply with global financial requirements.

All books, records and accounts of Novocure, regardless of location, must be maintained in accordance with all applicable accounting rules and regulations and Novocure's record management and retention policies. All transactions affecting assets, liabilities, shareholders' equity, revenues and expenses must be recorded on a timely basis in detailed journals and must be traceable through the general ledger and resulting financial statements.

The Company does not condone practices that might lead to fraudulent financial reporting, including any intentional or reckless conduct, whether by act or omission, that results in materially misleading financial statements. Novocure will not tolerate the falsification of information to it or on its behalf in the furtherance of Company business.

If Novocure provides goods or services to the U.S. Government, special recordkeeping rules may apply and the Chief Financial Officer must approve recordkeeping procedures for such projects.

The Company strictly complies with all applicable laws regarding furnishing pricing data to government entities. You should promptly advise the Finance Department if you become aware of any inaccuracy or deficiency in accounting records or government pricing reports.

*Please contact the Legal or Finance Departments for more information.*



## Records Management

Consistent with good business practices and good judgment, and in accordance with Novocure's record retention policies, you must retain records for as long as they are required and in the manner required to meet legal, regulatory, administrative and operational requirements. Records necessary for business reasons will be retained for a period of time that will reasonably assure the availability of those records when needed. Whenever it becomes apparent that records of any type will be required in connection with a lawsuit or investigation, all relevant records should be preserved, and ordinary disposal or alteration of records pertaining to the subject of the litigation or investigation should be immediately suspended.

*Please contact the Legal or Quality Departments for more information.*

## Investor, Media and Public Inquiries

As a company, we must speak with one voice to investors, analysts, the press and public interest groups. Therefore, any requests from agencies, including investors and financial analysts must be referred to the Investor Relations Department. Similarly, requests from the media or community members should be referred to the Communications Department.

It is important to remember that employees are not free to speak on behalf of Novocure. Seemingly innocent or routine inquiries may have broad implications that are not readily apparent. Only authorized personnel in Finance or Legal or their designees are permitted to issue statements on behalf of Novocure.

*Please contact the Investor Relations, Public Relations or Legal Departments or refer to the Public Disclosure Policy - LEG-POL-006, for more information.*

## Political Activities and Contributions

Novocure is committed to complying with all election and campaign contribution laws. The Company encourages all employees to be active participants in the political process. However, Novocure prohibits the use of corporate funds, facilities or resources for political purposes except in strict compliance with all applicable campaign finance laws through the Novocure Inc. PAC or unless prior approval has been received from the General Counsel in consultation with the Chief Executive Officer and Chief Financial Officer.

Personal contributions of time and/or money to political parties, campaigns and candidates must not be conducted on Company premises or during Company work time. You may not use Novocure resources or funds, directly or indirectly, to make any federal, state or local political contributions.

There may be occasions when Novocure provides information about pending legislation that may impact Novocure. In these instances, an employee may choose to voluntarily communicate his or her views to elected representatives in government, so long as they make it clear they are doing so in their individual capacities. Novocure employees whose job function include providing the Company's views to members of government (whether administrative or elected officials) must comply with all applicable lobbying laws and reporting obligations.

*Please contact the Legal or Government Affairs Departments for more information.*

---

**I will be attending a fundraiser for a local political candidate. Is it OK to list my position at Novocure as long as I don't use any Company funds or resources?**

*You will need to understand and comply with the laws and regulations that apply to your contribution. For example, U.S. Federal law requires candidates for federal office to collect information from donors contributing \$200 or more including their employer's information (other countries have similar laws). You must provide this legally required information, but under no circumstances can you indicate that your participation or support in political activities is representative of Novocure views.*



Patients remain at the heart  
of the work we do every day.





# empathy

## OUR INTERACTIONS WITH THIRD PARTIES, CUSTOMERS AND REGULATORS

### Fair Dealings

We are committed to maintaining long-term, productive business relationships with each of our customers. Every interaction we have with healthcare professionals, patients, payers and other customers is an opportunity to strengthen those relationships by demonstrating dedication, honesty, integrity and service.

We are also committed to dealing fairly with other third parties at all times. We provide only honest and truthful information, and will not engage in any unethical or illegal conduct as we conduct Company business. We do not disparage or make untrue statements about our competitors' products or services. Instead, we stress the advantages that we have to offer and only make accurate and fair comparisons between our offerings and those of our competitors.

*Please contact the Legal Department for more information.*

### Competitive Information

We deal with competitive information as part of conducting our business. If your work requires you to access or disseminate competitive information, you should remember the following guidelines:

- use only appropriate methods for collecting competitive information;
- never lie or misrepresent yourself when gathering information;
- if you receive a competitor's confidential information inadvertently, do not copy or forward this to others - immediately report the incident to the Legal Department;
- never recruit people with the intent to obtain any third-party confidential information; and
- communicate to agents, distributors, suppliers, consultants or other business partners that they must observe these guidelines when acting on behalf of our Company.

*Please contact the Legal Department for more information.*

### Healthcare Laws and Regulatory Requirements

Novocure is subject to many rules and regulations designed to protect patients and consumers, improve the quality of medicines and healthcare services and help eliminate fraud and improper influence on medical judgment.

---

**I received sensitive pricing information from one of our competitors. What should I do?**

*Contact the Legal Department without delay and before any further action is taken.*

---

**I am a manager and one of my new employees who recently joined Novocure from a competitor has confidential information from her previous employer. She says she plans to use it to our advantage. Should I just ignore this and let her do it?**

*No. If an employee retains and uses such information, it is not appropriate and can result in legal action by the competitor. You must tell her not to use the information and report this to the Legal Department for appropriate action.*



The Company follows all laws and regulatory requirements governing the development, manufacturing, distribution, marketing, government contracting, sale and promotion of our products. Because Novocure is a global company, the laws and regulatory requirements of one country may apply to activities in another country. For example, many requirements of the U.S. Food and Drug Administration (FDA) must be followed when conducting Novocure business and operations outside of the United States. In the event local laws and regulatory requirements differ from those of the United States, the stricter set of laws and regulatory requirements generally applies, with limited exceptions.

You must be familiar with the standards that apply to our business and your role. By following the Company's policies, you will increase your compliance with all laws and regulations relating to the conduct of our business.

Novocure is committed to providing timely and honest product information to patients, consumers, healthcare professionals and regulators worldwide to keep these stakeholders informed of the uses, safety, contraindications and side effects of our products.

*Please contact the Legal or Compliance Departments or refer to the Company's separate Compliance policies (beginning with "CMP") related to healthcare laws and regulatory requirements for more information.*

## Interactions with Healthcare Professionals and Patients

We have a responsibility to ensure that our interactions with healthcare professionals, patients and other customers are ethical and beyond reproach. We will not attempt to influence a healthcare professional, patient or customer through improper inducement. When interacting with health care professionals and/or patients, the Company's adherence to ethical standards and compliance with applicable laws is critical to our ability to preserve our reputation and to continue collaborating with health care professionals to serve the interests of our patients.

All interactions with health care professionals are guided by relevant laws, regulations and industry standards; national and regional industry and professional association codes; and the Company's policies and procedures relating to interactions with health care professionals. Novocure follows the AdvaMed Code of Ethics when interacting with health care professionals practicing in the United States; Medtech Europe Code of Ethical Business Practice when interacting with health care professionals practicing in Europe; and The Japanese Fair Trade Commission when interacting with healthcare professionals practicing in Japan. For interactions with any healthcare professionals in countries and/or regions outside those listed, Novocure follows the applicable laws and regional industry and association codes governing such interactions.

*Please contact the Legal or Compliance Departments or refer to the Company's separate Compliance policies (beginning with "CMP") related to interactions with healthcare professionals for more information.*

---

### I hosted a business dinner for a few healthcare providers and I spent more than the meal spending limits. What should I do?

*You should accurately list each and every attendee at the dinner and tell your manager and the Compliance Department that you exceeded the meal limitations. Under no circumstances should you alter the receipt, add names of attendees who were not present or otherwise provide inaccurate information in connection with the dinner.*

## Advertising / Marketing

We are committed to fair competition as a matter of corporate conduct and abiding by all laws that apply to our marketing activities, including regulatory labeling requirements in every market we serve. Under such laws, it is illegal to use unfair methods of competition or unfair or deceptive acts or practices in commerce, such as:

- false or misleading advertising, or any other form of misrepresentation made in connection with our products;
- bribery of competitors' or customers' employees or of health care professionals; and
- unfair comments about competitors' products.

Company employees performing sales, marketing, medical and regulatory functions must be familiar with Novocure's policies and procedures regarding labeling and promotional programs and other relevant topics.

*Please contact the Legal Department or refer to the Company's separate Promotional Review Policies (LEG-POL-004 or LEG-POL-023) for more information.*

## Patient Privacy

We are committed to preserving the privacy of personal information not only about our employees, but also personal information related to our patients and their caregivers. In many countries, personal information includes any information that can identify an individual, including, but not limited to, an individual's name, address, telephone number, medical records and any other information that can identify an individual. All employees are required to comply with Novocure's privacy policies regarding protecting personal information, including patient information, and applicable laws and regulations.

In order to protect personal information, Novocure employees should comply with certain obligations, including, but not limited to, the following:

- only permitting appropriate access to personal information held by Novocure in accordance with applicable laws and Company policies.
- making sure that personal information that identifies patients is kept strictly confidential and is only used or disclosed in accordance with applicable laws after appropriate notice is given and/or the individual's consent is obtained;
- collecting personal information only for legitimate business reasons;
- taking adequate precautions to safeguard personal information; and not sharing personal information with anyone who does not have a legitimate need to know such information as determined by the Company's policies.

*Please contact the Privacy Officer or refer to the Company's Privacy policies which begin with CMP for more information.*

---

### **I am non-scientific employee. What if a healthcare provider asks me about an off-label use of a Novocure Product?**

*Tell the Healthcare Provider that you are not permitted to discuss off-label uses of our product. Answer the question in a truthful, non-promotional manner and do not expand the discussion or encourage off label use. Discussions that focus on off-label use, even if started by a physician, could be viewed as off-label promotion.*

---

### **I have a list of patients who have received a Novocure product. Some of them have done very well and have had success. Can I send an email to sales employees telling them about the success and naming the patients?**

*No. Patient names are protected health information and can only be used or disclosed for specific purposes to authorized individuals. Do not send messages with patient information except to a member of your team treating the patient and only for authorized purposes.*

## Patient Safety

We are committed to providing the highest quality products and ensuring product integrity and patient safety during development, commercial manufacturing, and distribution throughout the product life cycle. Each of us must take personal responsibility for upholding the highest standards of quality in everything we do.

Novocure monitors and evaluates adverse events associated with our products in clinical trials and our marketed products. To ensure we meet our worldwide safety reporting requirements, you must promptly report any adverse events or medical events associated with any of our products to Medical Safety as set forth below; as soon as you become aware of such event, but in no event later than twenty-four (24) hours after such awareness:

Novocure  
Attention: Medical Safety  
DeviceSafety@novocure.com  
Phone: 603.498.6929

If you are not able to report an adverse event in the manner identified above, you must report the information to your manager within twenty-four (24) hours after you become aware of such adverse event.

*Please contact the Medical Safety Department or refer to the Company's separate Medical Safety Policies for more information.*

## Clinical Research

We are committed to ensuring the safety of the patients and volunteers who take part in our clinical trials, and to upholding the highest ethical, scientific and clinical standards in all of our research initiatives worldwide. All Novocure-sponsored clinical trials are designed and conducted in accordance with applicable laws and regulations as well as recognized medical and ethical standards. This begins with ensuring all patients have been fully informed and have provided a signed written consent as per local regulations prior to participation in any clinical studies. Our policies and procedures are intended to ensure Novocure's respect for the health, well-being and safety of research participants as well as for the culture, laws and regulations of the countries in which studies are conducted.

*Please contact the Clinical Operations or Clinical Development Departments or refer to the Company's separate Scientific Policies for more information.*

## Regulatory Affairs

In order to ensure that those patients who may benefit from our products have access to them, Novocure is dedicated to the development of safe and effective products. To this end, we are committed to compliance with the laws and regulations governing the design, manufacture, preclinical and clinical testing, marketing authorization, registration, labeling, and post-approval commitments of our medical products, as set forth by the regulatory authorities in the jurisdictions, countries, states and locales where we conduct business, such as the U.S. Food and Drug Administration, the European Medicines Agency, and where appropriate, international laws. In addition, we establish and maintain appropriate, open, constructive and professional relationships with regulators on matters of regulatory policy and submissions.

*Please contact the Regulatory Affairs Department or refer to the Company's separate Regulatory Affairs Policies for more information.*



## Quality Assurance

We strive without reserve to be unsurpassed in patient safety, product quality and reliability. Our goal is to be the company most trusted in product and therapy excellence. To achieve this goal, we must comply with the laws, regulations, Company policies and procedures and standards for safety and efficacy in the research, design, manufacturing, distribution and monitoring of our products. In addition to holding ourselves accountable for the quality of our products and therapies, we also hold our suppliers and distributors accountable to ensure the quality of the products and services they provide.

Each of us is responsible for asking questions and voicing concerns related to compromised quality and safety. We also have a responsibility to report any product quality issues for the purpose of tracking product performance and taking appropriate corrective and preventive actions. If you learn of a complaint associated with a Novocure product you have the responsibility to report it to the Quality Department.

*Please contact the Quality Department or refer to the Company's separate Quality Policies for more information.*

## Anti-corruption

Corruption undermines our integrity and reputation. It's contrary to our vision, mission and values. We succeed as a company based on the quality and value of our people, products and services. We will not permit corrupt acts as a means to further our business. They not only interfere with our long-term business goals, but can also put patients at risk.

*Please contact the Legal or Compliance Departments or refer to the Company's separate Anti-corruption Policy - CMP-POL-013 and the Global Engaging HCPs in Service Arrangements Policy - CMP-POL-010 for more information.*

*Any employee who believes they have observed conduct that would violate Novocure's Anti-corruption should contact the Legal or Compliance Department or utilize the Integrity Hotline available, which can be accessed through the [Novocure.com](http://Novocure.com) website*

### **Bribery**

We never offer or provide any improper payment or any form of bribe, illegal payment or kickback to anyone (e.g., healthcare professional, patient, government official) or any entity. A bribe is anything of value given in an attempt to affect a person's actions or decision in order to gain or retain a business advantage. We do not offer or provide items of value in order to improperly induce or reward a customer for recommending, using, ordering or purchasing a product or service. Likewise, we will not offer or pay for an unfair advantage in the marketplace, whether in areas of product approval, sales, research, permitting, hiring or any other aspect of our business.

Improper payments prohibited by this policy include bribes, kickbacks, excessive gifts or entertainment or any other payment made or offered to obtain an undue business advantage. Improper payments should not be confused with reasonable and limited expenditures for gifts, business entertainment and other legitimate activities directly related

---

**I have a suggestion on how to reduce product defects on my production line. I believe the solution may increase the time needed to produce the product, and I have a concern about raising it. What should I do?**

*Bring the suggestion forward. If your idea works, the extra time spent preventing the product defect could save time, energy and money in the end.*

---

**A research physician told me that he always makes sure Optune "looks good" in the clinical trials he runs. He says he knows Novocure appreciates it because the Company has contracted with him to do multiple trials. What should I do?**

*The issue should be raised to the Compliance or Legal Departments. Although the physician delivers good results, the Company may have failed to pick up on the physician's practices that could taint the trials, affecting patients, our product approval and our reputation. If made aware of this, the Company would investigate and take appropriate action.*

to the conduct of Novocure's business. We review each transfer of value to healthcare professionals to ensure there is a legitimate business need, we are paying them fair market value and there is a contract in place outlining the services to be rendered.

We do not hire third parties to do something we are not allowed to do ourselves. We could be liable for violating anti-corruption laws even if we did not know, but should have known, that an agent, distributor, or other third party acting on our behalf was giving a government official an illegal payment.

### ***Government Officials***

We take pride in our honest and transparent business practices and must never make inappropriate attempts to influence a government decision-maker. We must avoid giving any kind of illegal gift to a Government Official or employee of a government-owned enterprise. The standards for nominal gifts and entertainment can vary by country. Before giving anything of value, consult local standards and obtain prior written approval from the applicable country's Compliance employee. If you have any doubt as to whether a gift is permissible, contact the Legal or Compliance Department for guidance.

## **Antitrust and Competition Laws**

Antitrust and competition laws around the world protect free competition. While these laws are complex and difficult to summarize, at a minimum they prohibit agreements between Novocure and our competitors that affect prices, terms or conditions of sale or fair competition. If you are responsible for areas of the business where these laws apply, you must be aware of them and their implications, including how they apply in the country in which you operate.

The Company prohibits:

- discussions or agreements with competitors about pricing, costs or terms or conditions of sale;
- discussions or agreements with suppliers and customers that unfairly restrict trade or exclude competitors from the marketplace;
- agreements or understandings with competitors to fix prices or to allocate markets or customers; and
- agreements to refuse to deal with certain customers or suppliers.

Antitrust and competition laws are complex and can vary significantly from country to country.

*Please contact the Legal Department for more information.*

## **International Business**

The laws of the United States and other countries where Novocure does business prohibit or restrict direct or indirect dealings with certain countries. Such laws may also restrict our dealings in certain countries with individuals and companies controlled by certain governments. U.S. law also prohibits or restricts dealings with certain parties identified by the U.S. Department of Commerce and the U.S. Department of the Treasury. We exercise appropriate due diligence with regard to third parties with which Novocure will transact business and will keep employees apprised of any prohibitions against engaging in a business relationship with certain countries.

We do not engage in any dealings with a country subject to U.S., European Union, Swiss, Israeli or applicable United Nations embargoes or trade sanctions without prior written approval from the Legal Department. Dealings with countries under an embargo or sanctions imposed by countries or authorities other than United States or United Nations must also be approved in advance by the Legal Department.

Novocure will not enter into business transactions with or proceed with a business transaction if the other party is included on any Restricted Parties lists maintained by any governmental entity in the countries or regions in which Novocure operates.

*Please contact the Legal Department for more information.*

## Communication with Government Agencies

Novocure is subject to review and audit by various government agencies around the world and is often asked for information from those agencies. The Company will cooperate fully and in good faith with legitimate government inquiries and investigations. Each employee must provide truthful and complete information in the event s/he is questioned by government regulators or investigators regarding Novocure or his or her work at the Company. If you receive a request that the Company provide information to a government agency, please contact the Legal Department in order to ensure that all appropriate steps are taken to protect Novocure's legitimate business and/or legal interests.

*Please contact the Legal Department for more information.*

**I know someone from another company who was approached by the FDA at a conference. The official asked detailed questions about his job and company that made him feel uncomfortable. What should I do if this happens to me?**

*You should ask to see the officials credentials, get contact information and tell him or her that you would like to check with the Company before proceeding further and refer him to the appropriate Novocure representative to answer his concerns. You should then talk to the Legal Department immediately.*





# appendix

## REVISION HISTORY

Rev. No	Change Rationale	Update to Related Documents	Date
01	Initial release	N/A	22-Jul-2014
02	<b>Proposed changes:</b> Updates to the US Code of Conduct <b>Reason for change:</b> Updates needed to the US Code of Conduct	N/A	16-Feb-2017
03	<b>Proposed changes:</b> In section 4.1, added in Medtech Europe code of Ethical Business Practices. Updated the phone numbers to call if needing to report possible violations of federal or state laws or regulations. <b>Reason for change:</b> Document was revised to add in Medtech Europe code of Ethical Business Practices in section 4.1. Also, to update the phone numbers to call if needing to report possible violations of federal or state laws or regulations.	N/A	07-Sep-2017
04	<b>Proposed changes:</b> Updated the hotline information and consolidated duplicative information about making reports of misconduct <b>Reason for change:</b> Document was revised to update hotline information and consolidate duplicative information about making reports of misconduct	N/A	27-Sep-2017
05	<b>Change content:</b> Formatting corrections and 2018 updates <b>Change reason:</b> Changes due to formatting issues and 2018 updates	N/A	16-Nov-2018
06	<b>Change content:</b> 1. Updated to Quality document template; 2. Scope language created; 3. Sexual harassment law language added; 4. Work product language added <b>Change reason:</b> To align with Quality document templates, sexual harassment and training and ISO 27001 certification	HR-POL-US-013	07-May-2020
07	<b>Changed content:</b> 1. Remove approval table at end of document; 2. Updated document numbers in references. <b>Change reason:</b> 1. MasterControl approval route serves as signatures for release; 2. Documents archived and updated as new document numbers	N/A	14-Aug-2020
08	<b>Changed content:</b> 1. Updated code to add Environment, Regulatory, work safety sections; 2. Updated reporting line instructions; 3. Revised language throughout; 4. Added CEO Letter; 5. Added Values; 6. Added Japan Code references; 7. Added section on Ethical Business Practices. <b>Change reason:</b> Update Code	N/A	05-Aug-2021
09	<b>Changed content:</b> Minor functional updates made throughout <b>Change reason:</b> Update Code	N/A	20-Oct-2022
10	<b>Changed content:</b> Minor functional updates made throughout <b>Change reason:</b> Annual Review of the Code	N/A	29-Mar-2023

Document Owner: Bill Burke, SVP Human Resources; Barak Ben-Arye, General Counsel; Meredith Taylor, Chief Compliance and Privacy Officer  
Process Owner: U.S. Human Resources, Director, Human Resources



**novocure**<sup>®</sup>

Second Floor  
No. 4 The Forum  
Grenville Street  
St. Helier, Jersey, JE2 4UF

**[novocure.com](http://novocure.com)**

HR-POL-US-008; Rev. 10