
NOVOCURE LIMITED
POLICY AGAINST DISCRIMINATION AND HARASSMENT

1. Purpose

NOVOCURE is committed to maintaining a work environment in which all individuals are treated with civility and respect. NOVOCURE wants every employee to be able to work in a professional atmosphere that promotes a culture of excellence, cooperation and collaboration with equal employment opportunities and where workplace discrimination and harassment is prohibited. Therefore, NOVOCURE expects that all relationships among employees in our workplace will be business-like and free of offensive harassing and unprofessional conduct.

The purpose of this policy is to outline the Company's conduct expectations, our complaint procedure and the possible consequences for noncompliance.

As outlined in more detail in this policy, any employee who feels that he/she is a victim of workplace discrimination or harassment or has heard of or otherwise witnessed such conduct in the workplace should immediately report the matter to his/her supervisor, Human Resources, Legal, or the Complaint Hotline at <https://secure.ethicspoint.com/domain/media/en/gui/68414/index.html> or Complaint Hotline phone numbers listed below (per region). NOVOCURE will promptly investigate all such reports with appropriate care and discretion with the aim of resolving and, as needed, correcting the situation.

Region	Phone Number	Carrier	Access Code	Restrictions	Language
United States	1- 855-446-9022	AT&T		None	English
United States	1- 855-379-1486			None	English - Spanish
Israel	001- 855-446-9022	Barak	1-80-933-333	None	Hebrew
Israel	001- 855-446-9022	Bezeq	1-80-949-4949	None	Hebrew
Israel	001- 855-446-9022	Golden Lines	1-80-922-222	None	Hebrew
Switzerland	001- 855-446-9022		0-800-890011	A, 27	German
Germany	001- 855-446-9022		0-800-225-5288	A, 27	German
Austria	001- 855-446-9022		0-800-200-288	None	German
Sweden	001- 855-446-9022		020-799-111	None	Swedish
Japan	010- 855-446-9022	KDDI	00-539-111	A, D	Japanese
France (Paris only)	010- 855-446-9022	Telecom Development	0-800-99-0011	None	French
France	001- 855-446-9022	France Telecom	0-800-99-0011	None	French

Restriction	Description
A	Public phones require coin or card deposit
D	May not be available from every phone/public phone
27	Available from cellular phones

Individuals who have questions or concerns about this policy should talk with Human Resources.

1 Scope

Applicable location/sites: All Novocure locations;

Applicable departments/users: All Novocure employees;

Applicable activities/systems:

This policy applies to all Company employees and it prohibits harassment, discrimination and retaliation whether engaged in by fellow employees, by a supervisor or manager, or by a third party doing business with NOVOCURE (e.g., an outside vendor, consultant or customer).

NOVOCURE is also an equal opportunity employer which means that the Company doesn't discriminate in recruitment, hiring, compensation, advancement or other terms of employment on the basis of race, color, national origin, gender, sexual orientation, marital status, age, disability, religion, veteran status or any other protected characteristic under applicable laws. That policy is found on page 10 of the Employee Handbook.

2 Definitions and abbreviations

Term	Description
Discrimination	The act of treating an employee differently (e.g. denying promotions, wage increases or benefits, equitable treatment), because of his/her race, national origin, color, age, gender, sexual orientation, marital status, disability, religion, veteran status or other personal characteristic protected under applicable laws
Harassing Conduct	Includes, but is not limited to: epithets, slurs or negative stereotyping; bullying, 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 in person conduct or through e-mail, text or other form of communication)
Harassment	Verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race, color, religion, national origin, age, disability, gender, sexual orientation, marital status, 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) such conduct is severe or pervasive and has the purpose or effect of unreasonably interfering with an individual's work performance; or (iii) otherwise adversely affects an individual's employment opportunities
Sexual Harassment	Unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example: (i) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; ii) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (iii) such conduct is severe or pervasive and has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment
Retaliation	Punishment of an employee by an employer, manager or supervisor for engaging in legally protected activity such as making a complaint of harassment or discrimination or participating in workplace investigations. Retaliation can include any negative job action, such as demotion, discipline, firing, salary reduction, or job or shift reassignment or other adverse actions that impact the employee and his/her employment with the Company

3 Responsibilities

NOVOCURE is committed to maintaining a working environment free from discrimination and harassment. Human Resources in conjunction with the NOVOCURE Leadership team, through this policy, training and otherwise, will make widely known that discrimination, harassment and retaliation are prohibited and that the Company is committed to taking the appropriate steps to investigate and deal with allegations of discrimination, harassment and retaliation. Managers know that NOVOCURE is committed to enforcing this policy and the Company is prepared to take preventive and corrective action.

Managers and supervisors who observe or receive complaints of harassment or discrimination are strongly encouraged to seek assistance from Human Resources and Legal. Managers and supervisors who do not appropriately respond to discrimination, harassment or retaliation complaints brought to their attention could face disciplinary action up to and including termination of their employment.

4 Policy

4.1 General

NOVOCURE is committed to maintaining a working environment free from discrimination and harassment. Human Resources in conjunction with the NOVOCURE Leadership team, through this policy, training and otherwise, will make widely known that discrimination, harassment and retaliation are prohibited and that the Company is committed to taking the appropriate steps to investigate and deal with allegations of discrimination, harassment and retaliation. Managers know that NOVOCURE is committed to enforcing this policy and the Company is prepared to take preventive and corrective action.

Managers and supervisors who observe or receive complaints of harassment or discrimination are strongly encouraged to seek assistance from Human Resources and Legal. Managers and supervisors who do not appropriately respond to discrimination, harassment or retaliation complaints brought to their attention could face disciplinary action up to and including termination of their employment.

The law and Company policies prohibit disparate treatment on the basis of sex or any other protected characteristic, with regard to terms, conditions, privileges and perquisites of employment. The prohibitions against harassment, discrimination and retaliation in this policy are intended to complement and further these policies and legal standards, not to form the basis of an exception to them.

4.2 Retaliation is Prohibited

Retaliation against employees for reporting or complaining of harassment or discrimination on the basis of a protected characteristic, or for cooperating in an investigation of a report or complaint, will not be tolerated. Any retaliation is a serious violation of this policy and like harassment or discrimination, if retaliation is found, management will take the appropriate corrective action against the responsible person(s), up to and including unpaid suspension and/or termination of employment.

4.3 Complaint Procedure for Incidents of Harassment, Discrimination or Retaliation

Harassment, discrimination or retaliation of any kind is unacceptable. The Company takes allegations of such conduct very seriously, and will promptly investigate all such complaints. If it is determined that harassment, discrimination or retaliation has occurred, management will take appropriate corrective action against the responsible person(s), up to and including unpaid suspension and/or termination of employment.

If you believe that you have been harassed or experienced other conduct that violates this policy or have witnessed such conduct regarding others, bring your concerns to the attention of management immediately in any of the following ways:

- Report the conduct to your immediate supervisor;
- Report the conduct to Human Resources;
- Report the conduct to Legal;
- Report the conduct to the Complaint Hotline at
<https://secure.ethicspoint.com/domain/media/en/gui/68414/index.html> or call 011-1-855-379-1486

4.4 Complaint/Investigation

If possible, conduct that may be in violation of this policy should be reported before it becomes severe or pervasive. If the conduct involves, or employees aren't comfortable reporting the matter to their immediate supervisor, the complaint should be brought to the attention Human Resources, Legal or the Hotline referenced in this policy.

It is the Company's policy that all such matters will be handled with appropriate care and discretion.

- When an employee brings a complaint to the attention of any member of management, Human Resources is notified and a thorough and impartial investigation of the allegations will be promptly undertaken.
- Such investigation may include individual interviews with the parties involved and, where necessary, with persons who may have observed the alleged conduct or may have other relevant knowledge of the conduct or incident(s) in question.
- Confidentiality will be maintained throughout the investigatory process to the extent possible and consistent with adequate investigation and appropriate corrective action.

If the investigation reveals that inappropriate workplace conduct has occurred, management will take prompt and effective corrective action. Such measures are designed to put an immediate stop to any such conduct as well as prevent its recurrence. Therefore, management retains the right to take whatever action it believes appropriate under the circumstances, up to and including unpaid suspension of one or more days and/or termination of the employment of the offending person.

If the employee making a complaint is not satisfied with how it has been handled or with its resolution, he/she should bring that to the attention of the Chair of the Audit Committee or the Corporate General Counsel and Chief Compliance Officer and a reasonable effort will be made to address the employee's concerns.

The Company will monitor the situation after it has been addressed to ensure the conduct complained of hasn't reoccurred and there has been no retaliation. Likewise, the employees involved should promptly alert Human Resources or Legal of any such matters.

4.5 Timely Complaints and Opportunity for Company to Address

Employees who have experienced conduct they believe is contrary to this policy have an obligation to take advantage of this complaint procedure and assist the Company in its investigation and resolution of the matter. An employee's failure to fulfill this obligation could affect his or her rights in pursuing legal action.

Also, please note, federal, state and local discrimination laws establish specific time frames for initiating a legal proceeding pursuant to those laws.

Harassment, discrimination and retaliation are prohibited under this policy and the conduct complained of may also violate both federal and state law. The Company is committed to responding quickly and effectively to any internal report of harassment, discrimination or retaliation and hopes that all employees will be comfortable coming forward and allowing the Company to pursue an investigation and resolution of any such matter. That said, nothing in this policy is intended to interfere or limit, in any way, an employee's right to file a complaint or

seek the assistance of legal counsel, the courts or applicable state/federal administrative agencies.

Initial release: March 19, 2018

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