
NOVOCURE LIMITED

POLICY ON INTERACTIONS WITH HEALTHCARE PROFESSIONALS

1. PURPOSE

Novocure Limited (“Novocure or “the Company”) is committed to interacting and collaborating with Healthcare Professionals (“HCPs”) to develop new products and to provide education to HCPs and patients about the safe and effective use of Novocure products. The Company is committed to ethical business behavior by ensuring that Employees do not exert undue influence, or appear to exert undue influence, on HCPs’ medical judgment, prescribing habits, formulary decisions or involvement in clinical trials or other relevant research activities.

Novocure’s Code of Conduct (HR-POL-008) provides the Company’s vision for how to do business the right way during the course of a variety of business activities with HCPs, patients, third parties and with other Company Employees.

This Global Policy on Interactions with HCPs provides a broad foundation upon which Employees may frame their interactions with HCPs. All Employees are accountable for interacting with HCPs in an ethical manner while maintaining compliance with local laws, regulations, industry codes and guidelines and all applicable Company policies. Additionally, expenditures made to or on behalf of HCPs during these interactions will be reported in accordance with local law.

2. SCOPE

This Policy applies to all Employees, regardless of job function, who interact with HCPs.

This Policy does not provide an exhaustive list of business activities with HCPs, nor does it provide specific guidance for each activity, but rather is intended to provide a broad overview of ethical business interactions with HCPs. For specific guidance, please refer to applicable Compliance Policies (i.e., CMP-POL) relating to such activity.

3. DEFINITIONS

- Company – Novocure Limited and its affiliates
- Charitable Donation – type of external support provided to bona fide charities or other non-profit entities whose main objectives are charitable or philanthropic
- Employees – all Novocure Employees worldwide who interact with HCPs
- Healthcare Professional (“HCP”) – Any individual (with a clinical or non-clinical role) whether a government official, or employee or representative of a government agency or other public or private sector organization; including but not limited to: physicians, nurses, technicians, laboratory scientists, researchers, research coordinators or, procurement professionals, pharmacists - that in the course of their professional activities may directly or indirectly

purchase, lease, recommend, administer, use, supply, procure, or determine the purchase or lease of, or who may prescribe medical technologies or related services

- Medical Education Grant – funding provided to support independent educational activities in areas of interest to the Company (for HCPs, patients and members of the community)
- Promotional Review Committee (“PRC”) – formal committee that reviews and approves promotional materials and messages.
- Scientific Review Committee (“SRC”) – formal committee that reviews and approves some material for use by Scientific Employees
- Service Arrangement – a fee-for-service engagement with an HCP(s) to provide services to or on behalf of the Company
- Sponsorship – type of External support provided to a Charitable Organization, patient advocacy groups or other third parties in exchange for corporate recognition at a meeting/activity/initiative

4. **RESPONSIBILITIES**

All Employees who interact with HCPs are expected to read, understand and comply with this Policy as well as all other applicable “CMP” Policies that provide further guidance on business activities in their region.

5. **POLICY**

5.1. **Promotional Communications**

Novocure promotes the safe and efficacious use of Company products by providing substantiated information to HCPs. In a promotional context, Employees provide HCPs with education and information about the approved and appropriate uses of Novocure products. Promotional materials and messages distributed to HCPs should be on-label, accurate, fairly balanced, scientifically rigorous and consistent with local law. Promotional messages and materials should not be incomplete, exaggerated or misleading, either directly or by implication. Promotional materials must be reviewed and approved by the Promotional Review Committee (“PRC”) or other established review committee in accordance with local law and policies.

5.2. **Scientific Communications**

Novocure is committed to scientific integrity and the unbiased exchange of accurate and non-misleading medical information. Some Employees (e.g., Medical Affairs, Clinical Affairs/Operations/Development) are permitted to engage in scientific exchange directly or indirectly with HCPs to communicate medical information in a non-promotional manner such as answering unsolicited questions for medical information, publishing in peer reviewed journals, discussions with investigators related to clinical trials, gathering information related to medical complaints, etc. All communications should be truthful, accurate, substantiated, scientifically rigorous and consistent with local law. Publications should conform to all accepted local ethical standards and guidelines.

5.3. **Scientific Research Initiatives**

Novocure sponsored and supported research activities are ethical in design and implementation. All research activities must be necessary and all scientific outcomes are presented in an objective, scientifically based, non-promotional, balanced and transparent way, consistent with local law and well-accepted international standards. Novocure will never use undue influence or coercion to enroll patients into clinical trials and will never influence the outcomes of clinical trials and scientific research activities through interactions with HCPs or otherwise. Protocols are reviewed by local institutional review boards or ethics committees except where exempted by local law.

5.4. Service Arrangements

Novocure may engage HCPs to provide bona-fide services for the Company. HCPs may provide services such as: promotional speaking, advisory, assistance in the development of products or marketing claims, participation in meetings related to Company supported or sponsored clinical trials or other research activities, speaking at conferences, etc. Regardless of the service, there must be a pre-articulated, Legal/Compliance approved legitimate business need and a fully executed contract in place before the HCP renders services. Additionally, the compensation paid must be based on fair market value as judged by local standards and as approved by Compliance. Novocure will provide travel and expense reimbursement for HCPs as is necessary and appropriate to achieve the legitimate business need. Novocure will never retain any HCP as an inducement to prescribe or recommend a product or to influence the results of a clinical trial or other relevant research activities. All Service Arrangements with HCPs must be reviewed and approved by Legal/Compliance prior to any services being rendered. Expenditures made to or on behalf of specific HCPs related to Service Arrangements must be accurately recorded in the Company's expense reporting system (e.g., Concur), other financial system or otherwise retained and made available for reporting requirements as required by local law.

5.5. Novocure Meetings

Novocure may host educational or promotional meetings intended to educate HCPs about Company products, disease states or other Novocure-related business. The focus and intent of these meetings are education and as such, meals, travel, lodging and venues provided to HCPs must be conducive and necessary to the educational need and never be offered to HCPs as an inducement to prescribe or recommend a product or to influence the results of a clinical trial or other relevant research activities. Venues must not be luxurious and, to the extent feasible, should be held where the majority of the attendees live or work. Novocure will not invite, pay for or provide expense reimbursement for guests.

5.6. External Support Provide to Third Parties

Novocure is dedicated to supporting external organizations such as healthcare organizations, patient advocacy groups and charitable organizations that have shared goals related to advancing medical care and improving patient outcomes and community philanthropy. Novocure is also committed to the advancement of genuine medical education of HCPs, patients and the public on clinical, scientific and healthcare topics. Novocure is further interested in supporting educational or healthcare related events organized by for-profit third parties in return for name recognition or other tangible benefits. The types of funding Novocure may provide include Medical Educational Grants, Charitable

Donations and Sponsorships. Novocure will never provide external support as an inducement to prescribe or recommend a product or to influence the results of a clinical trial or other relevant research activities.

5.7. Patient Support Services

Novocure is committed to putting the patient first. As part of that commitment, and in compliance with local law, patient support Employees (e.g., Care Coordinators, Device Support Specialists) provide coordinated services to patients after a prescription is written to ensure continued safe use of the product. These Employees interact with the patient's HCP as necessary and in accordance with local law to continue the coordination of HCP-directed patient care. Novocure does not offer operational assistance to HCPs in order to influence prescribing or recommending of Novocure products or to influence the outcome of clinical trials. Under no circumstances may Employees provide medical care, which is the sole responsibility of the patient's HCP.

5.8. Privacy

Novocure is committed to complying with the applicable data privacy requirements in the countries in which it operates to protect the privacy of patients, employees, HCPs or any individual with whom the Company does business. Novocure only processes personal data for the duration and scope for which it has a legal purpose to do so, and promptly reports improper disclosures or data breaches to the relevant government agencies.

5.9. Meals

Novocure may provide modest meals to HCPs on an occasional basis in order to facilitate scientific, educational or business discussions. Meals must be incidental to the discussion and provided in a manner that is conducive to the exchange of information. Meals must be modest based on local standards and comply with local law. Meals may never be offered to HCPs as an inducement to prescribe or recommend a product or to influence the results of a clinical trial or other relevant research activities. Meals provided to HCPs must be accurately recorded in the Company's expense reporting system (e.g., Concur) to be reported to the government as required by local law.

5.10. Items

Novocure may provide HCPs with medically relevant, educational or practice related items where permitted by local law. Items must only be given on an occasional basis as is customary in a certain marketplace. Items must be of nominal value and may never be given to an HCP as an inducement to prescribe or recommend a Novocure product or to influence the outcome of a clinical trial or other relevant research activities. Items provided to HCPs must be accurately recorded in the Company's expense reporting system (e.g., Concur) to be reported to the government as required by local law.

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