

CLOVIS ONCOLOGY, INC.  
POLICY ON RECOUPMENT OF INCENTIVE COMPENSATION

If the Board of Directors of (the “Board”) of Clovis Oncology, Inc. (the “Company”) has determined that any performance-based equity award or incentive cash compensation has been paid to any current and former Executive Officer (as defined below) of the Company based on a material misstatement in the Company’s financial statements or performance metrics that directly or indirectly resulted from that Executive Officer’s detrimental conduct, the Board shall take, in its discretion, such action as it deems necessary to recoup such compensation paid, as described below.

In determining what remedies to pursue, the Board will take into account all relevant factors. The Board, to the extent permitted by applicable law, in all appropriate cases and in its discretion, may seek reimbursement of any portion of performance-based equity awards earned by or incentive cash compensation paid or awarded to the Executive Officer that is greater than what would have been earned by, paid or awarded to the Executive Officer if calculated based on the restated financial statements or performance metrics. If the Board determines that it is appropriate to recoup performance-based equity awards or incentive cash compensation from an Executive Officer under this policy the Board will, in its sole discretion, determine (a) the amount of performance-based equity award or incentive based cash compensation that is subject to recoupment and (b) the method of recoupment, including whether to seek the return of incentive-based compensation already paid or to withhold or otherwise recoup (totally or partially) compensation that has not vested or has not been paid.

The Board is authorized to interpret and construe this policy and to make all determinations necessary, appropriate or advisable for the administration of this policy.

For purposes of this Policy, the term “Executive Officer” means the (i) Company’s Chief Executive Officer, (ii) the Company’s Chief Financial Officer, (iii) any Executive Vice President of the Company, (iv) any officer serving on the executive committee of the Company and (v) any officer or other person of the Company who performs a policy-making function.