

## **Fulcrum Therapeutics Expanded Access to Investigational Therapies Policy**

### **Belief Statement**

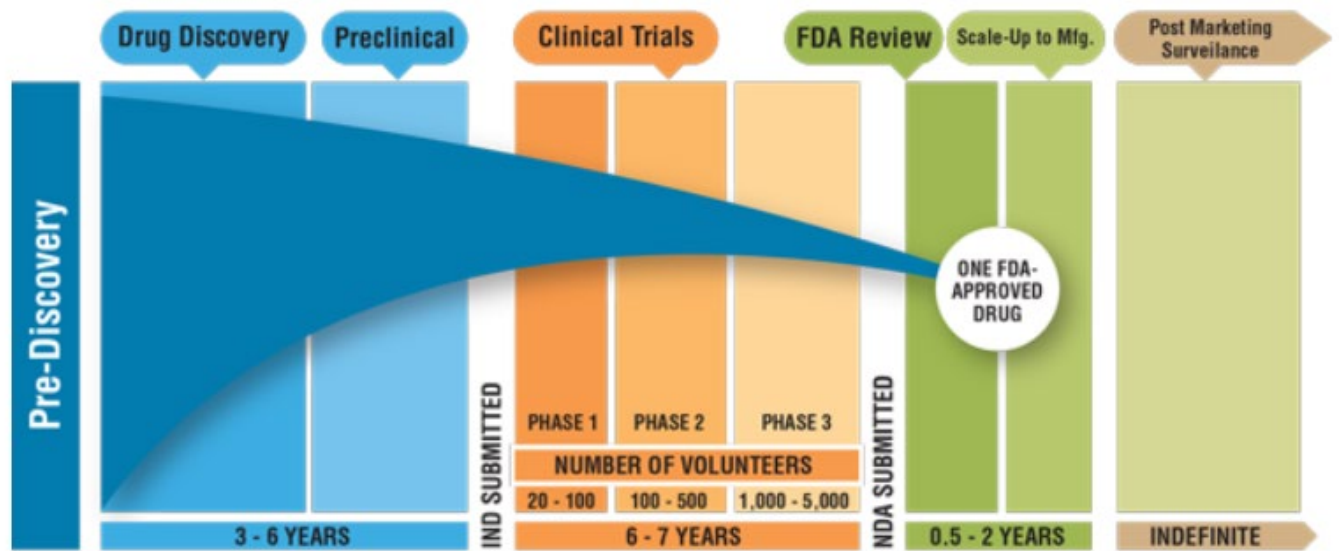
Fulcrum Therapeutics (Fulcrum) is committed to developing safe and effective medications to treat serious diseases with unmet medical need. Ultimately, the best way to provide broad access to whole patient communities is to progress programs fully through commercialization, however, Fulcrum understands the urgent need of patients with few treatment options to gain access to therapies much earlier in the developmental pipeline. Our goal, when possible, is to allow access to drug product through multiple channels when doing so does not disrupt or slow down the commercialization process.

At Fulcrum, we believe that the best route to access of an investigational drug product is through an FDA approved clinical study. For patients who have completed a clinical study with a Fulcrum product, it is our plan, when feasible, to assess options to continue access through long-term extension studies until the drug is available commercially. While Fulcrum will make every effort to create studies that are inclusive of as many patients as possible, we recognize that not every patient will be able to participate in these studies. There are a variety of reasons that a patient will not be a candidate for participation in a clinical trial, including geographical location, disease progression status, and inclusion/exclusion criteria. Access remains an important goal for Fulcrum as a company, and every effort will be made to ease the burdens and remove potential barriers for our patient communities. As a last option, Fulcrum has created an avenue for individual patients to request expanded access of our investigational drug products.

### **Expanded Access**

The US Food and Drug Administration defines Expanded Access in the following way “... *expanded access is a potential pathway for a patient with an immediately life-threatening condition or serious disease or condition to gain access to an investigational medical product (drug, biologic, or medical device) for treatment outside of clinical trials when no comparable or satisfactory alternative therapy options are available.*”

Example Drug Discovery and Development Timeline



Credit: [cancerprogressreport.org](http://www.cancerprogressreport.org) [Internet]. Philadelphia: American Association for Cancer Research; ©2011. Available from <http://www.cancerprogressreport-digital.org/cancerprogressreport/2011?pg=1#pg1>.

Typical development of a new therapy can take 10 years or greater prior to commercially reaching the patient population. Fulcrum recognizes the need for faster access of promising investigational drug products as soon as safety has been well established, and data points to positive efficacy results, generally between phases 1 and 2 in the clinical trial process.

Clinical trials have four phases that must be completed before a new drug application (NDA) can be submitted for full approval to regulatory bodies. The following is a description of the phases of most clinical trials in rare disease, please note that some studies will not be designed exactly this way, clinical phases are sometimes combined, and earlier stage approvals are possible.

**Phase 1** - Testing of Therapeutic target on a small group with the goal of assessing safety and finding the correct dose.

**Phase 2** - Testing of Therapeutic at the selected dose to assess efficacy and side effects.

**Phase 3** - Longer, often larger study to assess efficacy and safety in broader group for an extended period of time. This is the clinical phase on which the eventual filing with regulatory bodies leading to commercialization will occur.

**Phase 4** - Post-market surveillance study to continue to monitor the drug’s use after it has been approved and is being provided commercially in the general public.

Consideration of expanded access to drug product will occur when all of the following are true:

- Phase 2 is complete and Phase 3 is initiated,
- There is adequate safety and efficacy data in a matched population to ensure a positive risk/benefit assessment,
- Fulcrum has an excess drug supply after considerations have been made for all ongoing studies, and
- Providing expanded access to the investigational product will not affect the ongoing clinical development program negatively.

Criteria for individual patient expanded access consideration is met when;

- Patient has a medical condition that is within the areas being studied by Fulcrum,
- The patient's medical condition is serious or life threatening as determined by their health care provider,
- The patient has an unmet medical need after consideration or provision of standard care treatments by a specialist in their disease area,
- The individual does not qualify and is not enrolled to participate in any ongoing clinical study sponsored by Fulcrum Therapeutics or other pharmaceutical companies in the same disease area as determined by a qualified health care provider,
- The request has been made by a qualified physician,
- The patient/physician is willing to carry out protocol deemed appropriate by Fulcrum including data collection, safety reporting under the appropriate regulatory standards, including regulatory agency, and/or Institutional Review Board (IRB)/Institutional Ethics Committee (IEC), review as applicable, and
- Patient/physician agrees to maintain records and release them as requested to Fulcrum.

### How to request access to an investigational drug product

In order to maintain confidentiality, request for expanded access may only be made by patient's treating physician or qualified HCP. Physicians and HCPs may submit all requests in writing. We at Fulcrum understand that every day makes a difference in the lives of those with rare disease, and so all requests will be processed, and decisions will be made, as soon as possible after receiving the written request.