Fulcrum Therapeutics Expanded Access to Investigational Therapies Policy

Belief Statement

Fulcrum Therapeutics (Fulcrum) is committed to developing safe and effective medications to treat rare and serious diseases with high unmet medical need. Ultimately, broad access to Fulcrum’s meaningful treatments will be provided after all regulatory approvals are obtained. However, Fulcrum understands the urgent need for patients with no or few treatment options to gain access to therapies prior to full regulatory approval. Our goal, when possible, is to allow limited access to Fulcrum’s investigational products when doing so is safe for the patient and does not disrupt or slow down the development process.

At Fulcrum, we believe that the best route to access an investigational product in the United States (US) is by participating in an FDA approved clinical trial. For patients who have completed a clinical trial receiving a Fulcrum investigational product, it is our plan, when feasible, to continue access to the investigational product until it is approved and available locally. While Fulcrum will make every effort to design trials that are inclusive of as many patients as possible, we recognize that not every patient will be able to participate in these trials. Access remains an important goal for Fulcrum as a company. Every effort will be made to ease the burdens and remove potential barriers for our patient communities. Fulcrum will consider requests, via Expanded Access in the US, made by a patient’s treating physician after all other alternatives have been considered.

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.”

Drug Discovery and Development Timeline:

Typical development of a new therapy/medicine can take up to 10 years or greater prior to commercially reaching the patient population. Fulcrum recognizes the need for faster access for rare and serious diseases of promising investigational products as soon as clinical safety has been well established, and data shows evidence of positive efficacy, generally after Phase 2 in the clinical trial process.
Clinical trials have three 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, please note that some trials will not be designed exactly this way, clinical phases are sometimes combined, and earlier stage approvals are possible.

**Phase 1** - Testing of investigational product in a small group of healthy subjects and/or a few patients with the rare/serious disease. The goal of this phase is to assess safety and tolerability.

**Phase 2** - Testing of investigational product at the selected dose(s) to assess efficacy and safety.

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

**Phase 4** - Post-market surveillance trial 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 investigational products will occur when all requirements are met:

- There is adequate safety and efficacy data to ensure a positive risk/benefit assessment,
- Fulcrum has an adequate supply of the investigational product after considerations have been made for all ongoing trials, and
- Providing Expanded Access to the investigational treatment will not affect the ongoing clinical development program.

Criteria for Expanded Access consideration:

- The patient has a medical condition that is within the indication(s) being studied by Fulcrum,
- The patient’s medical condition is serious or life threatening as determined by their treating physician,
- The patient has an unmet medical need after consideration or provision of standard care treatments by a specialist in their disease area,
- The potential benefits to the patient outweigh the potential risks of the investigational product,
- The patient is not eligible and is not enrolled to participate in any ongoing clinical trials sponsored by Fulcrum or any other pharmaceutical companies in the same disease area as determined by a qualified treating physician,
- The request has been made by a qualified physician,
- The patient/treating 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
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- The patient/treating physician agrees to maintain records and release them as requested to Fulcrum.

How to request access to an investigational product:

In order to maintain confidentiality, request for Expanded Access may only be made by patient’s treating physician or qualified health care provider (HCP). All requests should be submitted in writing to expandedaccess@fulcrumtx.com. Fulcrum understands that every day makes a difference in the lives of those patients with rare and/or serious diseases and diseases with a high unmet medical need. All requests will be processed, and decisions will be made, as soon as possible after receiving the written request. Every request will receive a receipt of the request within 3 business days.

HCPs, patients and caregivers who are interested in learning more about Fulcrum’s investigational products that are currently under investigation can go to ClinicalTrials.gov and search using various criteria (company name, drug name, disease, etc). We encourage all patients to discuss treatment options with your treating physician.