Celldex Compassionate Use Policy

Purpose

The purpose of this policy is to describe the requirements for compassionate use of Celldex investigational products to patients outside of a clinical study. This policy applies to access to a Celldex investigational product that is not approved for any purpose in the country where the product is intended to be used.

Overview

For new medicines and vaccines to be legally approved for use, companies like Celldex are required to evaluate their safety and effectiveness in clinical trials and submit trial results to regulatory agencies, like the United States Food and Drug Administration (FDA). To participate in a trial, patients must meet certain criteria. In cases where a clinical trial isn't an option and the patient has exhausted all available treatment options, regulators may grant permission for Celldex to provide a treating physician with an unapproved drug. Such individual use of an investigational product is often called "compassionate use" or "expanded access" but may go by other names. Celldex refers to these uses collectively as "compassionate use."

Celldex is focused on conducting clinical trials required by regulatory authorities to fully answer important scientific questions about the potential risks and benefits of our investigational products and to obtain regulatory approval and marketing authorization.

Celldex endeavors to make investigational products available to patients with life-threatening diseases who have exhausted other treatment options and where there is a reasonable expectation of benefit over risk as defined in this policy. In general, a treating physician, who has experience with the investigational product and is able to comply with the requirements that are stated in this document, may apply for access to Celldex's investigational products on behalf of their patient(s) by contacting compassionateuse@celldex.com. Requests for access are generally reviewed within 5 business days with responses provided to the treating physician. Patients or non-healthcare professionals should work with their treating physician on getting access to Celldex's investigational products and cannot apply for access directly, however, they may submit questions or seek more information directly from Celldex at info@celldex.com.

Policy Statements

- Any use of a Celldex investigational product outside a clinical study must be in accordance with local laws and regulations governing such programs, including Celldex policies and procedures.
- In general, where permitted by local regulation, the investigational product supplied via compassionate use may no longer be provided by Celldex when it becomes available via the local healthcare system or following discontinuation of the drug development program.

Compassionate Use Eligibility

At Celldex, compassionate use of an investigational product will only be considered if all of the following conditions are met:

- The disease or condition being studied is serious or immediately life-threatening;
- There are no adequate alternate therapies or clinical trials available;
- There is sufficient preliminary rationale, dosing, activity and safety data for the investigational product in order for Celldex to make a benefit-risk analysis consistent with the establishment of a compassionate use program. In general, this would not occur earlier than the end of Phase 2 studies, and depending on the clinical program, potentially even later.
- A request is received directly from a patient's treating physician who has experience with the investigational product (i.e., has served as an investigator on a clinical trial of the investigational product).
- Both the treating physician and the responsible Celldex Medical professional agree that there is compelling biological rationale for the disease or condition coupled with adequate human clinical data to support an assessment that the potential patient benefit justifies the potential risks of the treatment use, and those potential risks are not unreasonable in the context of the disease or condition to be treated.
    - There may be other pertinent medical criteria for access to the investigational product, as established by the responsible Celldex medical professional.
- The provision of the investigational product will not interfere with or compromise the clinical development of the product as this may preclude making a safe and effective treatment available to patients.
    - The patient must be ineligible for participation in any actively enrolling clinical study of the investigational product. Patient who are unable to participate in a clinical trial due to geographic limitations may be considered for compassionate use.
- Adequate supply of the investigational product exists to perform necessary clinical studies in addition to provide access to patients who do not have alternative treatment options.
- The applicable regulatory agency and Institutional Review Board review and approve the use of the investigational product for the particular patient.

The above criteria are those that Celldex will consider in determining whether to offer compassionate use. Celldex cannot make a guarantee that a compassionate use program will be available nor that the investigational product will be available to a particular patient even if a compassionate use program is available.

Treating Physician Criteria and Responsibilities

The physician(s) attending to the patient(s) who is/are receiving an investigational product through compassionate use access is (are) properly licensed and fully qualified to administer the product.

The physician must have experience with the investigational product and agree in writing to comply with:

- Any applicable country-specific legal and regulatory requirements related to providing an investigational product under compassionate use; and
- Any Celldex requirements in terms of medical criteria, safety reporting and drug supply/administration.

Requesting Access

To seek access to an investigational product via compassionate use, the following steps should be followed:

- Review the eligibility criteria and treating physician criteria and responsibilities
- Have the patient's qualified treating doctor make a formal request to compassionateuse@celldex.com. Only requests from the treating physician will be reviewed.

Patients or non-healthcare professionals cannot submit requests but may submit questions to info@celldex.com.

Reviewing Requests for Access

Celldex is committed to a fair and impartial evaluation of each request for access to our investigational products. All decisions are based solely on clinical circumstances and are guided by the principles outlined above.

Medical professionals at Celldex who are familiar with the data collected on the investigational product evaluate the request and respond based on the scientific evidence available to the company at the time of the request. Celldex commits to respond to compassionate access requests within no more than five business days of receipt of the formal request and required supporting medical documentation. The regulatory agency in the country of the request and local ethics committee must also approve the proposed use of the investigational product.

Learn More

To obtain additional information about expanded access to Celldex investigational products, please visit www.clinicaltrials.gov.

This policy is effective as of February 2017. Celldex reserves the right to amend or rescind this policy at any time without prior notice.

Compassionate Use Frequently Asked Questions

Who is a candidate for compassionate use of an investigational product?

To be eligible for access to an investigational product, patients must meet the following criteria:

- Suffer from a serious or immediately life-threatening disease or condition; for which there must be compelling biological rationale for the disease or condition coupled with adequate human clinical data to support an assessment that the potential patient benefit justifies the potential risks of the treatment use, and those potential risks are not unreasonable in the context of the disease or condition to be treated.
- Have undergone standard treatments appropriate for disease and stage without definitive disease control, and comparable or satisfactory alternative treatments to diagnose, monitor or treat the disease and stage are not available.
- Are ineligible for participation in any ongoing clinical study of the investigational product, including lack of access due to geographic limitations
- Meet any other pertinent medical criteria for access to the investigational product, as established by the Celldex medical professionals working on the drug development program

Which investigational products in Celldex's pipeline are available for compassionate use?

Celldex is currently accepting requests for compassionate use for the following investigational products. To obtain additional information about expanded access to Celldex investigational products, please visit www.clinicaltrials.gov.

- Rindopepimut for EGFR*vIII* expressing recurrent glioblastoma, NCT03068650
- Glembatumumab vedotin for gpNMB expressing metastatic triple negative breast cancer, NCT03067935

How does Celldex decide which investigational products are available for compassionate use?

For a Celldex investigational product to be considered for compassionate use, the investigational product must meet the following criteria:

- There is sufficient preliminary efficacy and safety data for the investigational product in order for Celldex to make a benefit-risk analysis consistent with the establishment of a compassionate use program. In general, this would not occur earlier than the end of Phase 2 studies, and depending on the clinical program, potentially even later.
- There is sufficient clinical data to identify an appropriate dose and dosing frequency of investigational product.
- The provision of the investigational product will not interfere with or compromise the clinical development of the product.
- Adequate supply of the investigational product exists to perform necessary clinical studies in addition to provide access to patients who do not have alternative treatment options.

How do I submit a request for compassionate use of an investigational product?

Treating physicians who have prior experience with the investigational product may submit compassionate use or expanded access requests on behalf of patients or their caregivers. Physicians may submit requests to Celldex at compassionateuse@celldex.com. Patients or non-healthcare professionals cannot submit requests but may submit questions to info@celldex.com.

Who decides who may access investigational products for compassionate use, and what criteria are used to make the decision?

Medical professionals at Celldex who are familiar with the data collected on the investigational product evaluate the request and respond based on the scientific evidence available to the company at the time of the request. The regulatory agency and local ethics committee in the country of the request must also approve the proposed use of the investigational product.

How long does it take to receive a response for a compassionate access request?

Celldex commits to respond to compassionate access requests within no more than five business days of receipt of the formal request and required medical documentation. The country regulatory authority must grant final approval. The U.S. Food and Drug Administration strives to respond quickly (within a business day or two). In other countries regulatory response times may vary.

When a compassionate access request has been approved, how long does it take to receive the drug?

Celldex works to ship drugs for compassionate use as quickly as possible. Although the delivery time may vary with international shipping requirements and restrictions, we do whatever it is within our control to help expedite once all necessary documentation has been received.