



Clinical Study Protocol: ORA-D-012

Study Title:	A Phase 2a, Randomized, Double-Blind, Double-Dummy, Placebo-Controlled, 3-Way Crossover Study to Compare Safety, Efficacy and Pharmacodynamics of Single and Multiple Doses of ORMD-0801 or Placebo in Adult Subjects with Type 2 Diabetes Mellitus
Protocol Number:	ORA-D-012
Study Phase:	Phase 2a
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Name of Sponsor Signatory:	Miriam Kidron, PhD Chief Scientific Officer and Director Oramed Ltd.
Protocol Version:	1
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The undersigned has reviewed and approved Protocol No. ORA-D-012 for issuance:

Miriam Kidron, PhD
Chief Scientific Officer and Director
Oramed Ltd.

Signature

Date

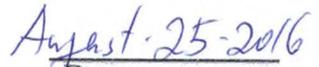
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Date

INVESTIGATOR SIGNATURE PAGE

I have read the attached protocol and agree that it contains all the necessary details for performing the study.

I will provide copies of the protocol and of the Investigator's Brochure (IB), which was furnished to me by the Sponsor, to all members of the study team responsible to me who participate in the study. I will discuss this material with them to assure that they are fully informed regarding the study treatment, including the potential risks and side effects, and the conduct of the study.

Once the protocol has been approved by the Institutional Review Board (IRB), I will not modify this protocol without obtaining the prior approval of the Sponsor and of the IRB. I will submit the protocol modifications and/or any informed consent form (ICF) modifications to the Sponsor and the IRB, and approval will be obtained before any modifications are implemented.

I understand the protocol and will work according to it, the principles of Good Clinical Practice [GCP; current International Council for Harmonisation (ICH) guidelines], and the Declaration of Helsinki (1964) including all amendments up to and including the October 2013 revision.

Joel M. Neutel, M.D.
Principal Investigator
Orange County Research Center

Signature

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Joel M. Neutel, M.D.
Principal Investigator
Orange County Research Center

Signature



Date

8/25/16

SYNOPSIS

Title	A Phase 2a, Randomized, Double-Blind, Double-Dummy, Placebo-Controlled, 3-Way Crossover Study to Compare Safety, Efficacy and Pharmacodynamics of Single and Multiple Doses of ORMD-0801 or Placebo in Adult Subjects with Type 2 Diabetes Mellitus
Indication	Type 2 Diabetes Mellitus (T2DM)
Clinical Phase	Phase 2a
Study Treatment	ORMD-0801
Dose	460 IU (16 mg) total
Dosage Regimen	Once daily, twice daily, or three times daily
Formulation	Soft gel capsules, 2 capsules per dose
Mode of Administration	Oral
Primary Objective	<ul style="list-style-type: none"> To compare pre-treatment (Day 3) to end of treatment (Day 8) 24-hour CGM glucose for single and multiple doses of ORMD-0801 vs placebo. To evaluate safety parameters for single and multiple doses of ORMD-0801 vs placebo.
Secondary Objectives	<ul style="list-style-type: none"> To compare pre-treatment (Day 3) to end of treatment (Day 8) mean daytime CGM glucose for single and multiple doses of ORMD-0801 vs placebo. To compare pre-treatment (Day 3) to end of treatment (Day 8) mean nighttime CGM glucose for single and multiple doses of ORMD-0801 vs placebo. To compare pre-treatment (Day 3) to post-treatment washout (Day 9) 24-hour CGM glucose for single and multiple doses of ORMD-0801 vs placebo. To compare post-prandial glucose measurements for single and multiple doses of ORMD-0801 vs placebo. To compare pre-treatment (Day 3) to end of treatment (Day 8) insulin pharmacokinetics (PK) for single and multiple doses of ORMD-0801 vs placebo. To compare pre-treatment (Day 3) to end of treatment (Day 8) C-peptide pharmacodynamics (PD) for single and multiple doses of ORMD-0801 vs placebo. To compare defined events of hypoglycemia for single and multiple doses of ORMD-0801 vs placebo.
Total Sample Size	Approximately 30 adult male and female subjects between the ages of 20 and 75 inclusive with T2DM.
Study Design	Following Screening, eligible subjects will enter a 3-day single-blind placebo run-in. On Day 4, each subject will be randomized to a treatment sequence that will include three treatment assignments for

	<p>each of three treatment Periods according to the randomization scheme. All subjects will receive placebo plus two of the following: ORMD-0801 460 IU qd, ORMD-0801 bid, or ORMD-0801 tid. Subjects will receive the randomized treatment from Day 4 through Day 8. A 24-hour single-blind placebo washout will be done on Day 9. For all treatment Periods, pre-treatment CGM data will be collected for approximately 36 hours prior to treatment (Days 1-3). The cannula will be changed and the monitor will remain in place until the morning of Day 10. Blood samples for PD analysis will be taken pre-treatment (Day 3) and at end of treatment (Day 8) to check for concentrations of insulin and C-peptide in the blood. In addition, adverse events, clinical laboratory values, vital signs, and ECGs will be evaluated periodically for safety. Subjects will be discharged on the morning of Day 10. Each treatment Period will be separated by a 2-week washout. A final follow-up visit will be performed 1 week after the end of the third treatment Period.</p>
<p>Summary of Assessments</p>	<p>Safety will be verified by monitoring adverse events, clinical laboratory values, vital signs, physical examinations, and ECG.</p> <p>CGM Monitoring will be used throughout the entire treatment period to compare pre-treatment, treatment, and post-treatment glucose levels, as well as post-prandial glucose.</p> <p>Pharmacokinetics/Pharmacodynamics will be used to compare pre-treatment and post-treatment C-peptide and insulin levels.</p>
<p>Duration of Participation</p>	<p>Subjects will be evaluated for participation in the study during a 7-10 day Screening period. The planned length of participation is about 65 days (from Visit 2 through Visit 3). During each Visit 2 treatment Period, the subjects will be confined to the unit for 8 nights from check-in on the evening of Day 2 through completion of the post-treatment procedures on the morning of Day 10.</p>
<p>Subject Selection Criteria</p>	<p>This study will enroll T2DM subjects with an HbA_{1c} $\geq 7.5\%$ and $\leq 10.5\%$, who are taking metformin only, metformin in addition to sulfonylurea, metformin in addition to TZD, metformin in addition to an SGLT-2 inhibitor, or metformin in addition to a DPP-4 inhibitor with all treatment regimens stable for a minimum of 8 weeks prior to Visit 2/Period 1/Day 1.</p>
<p>Statistical Methods</p>	<p>Pharmacokinetics/Pharmacodynamics (PK/PD) The PK/PD analysis will be conducted using model-independent methods and will be based on plasma concentrations of insulin and C-peptide.</p> <p>Continuous Glucose Monitoring The placebo adjusted change in means will be analyzed using an Analysis of Variance (ANOVA) with treatment as the main effect to</p>

	<p>determine whether multiple doses a day has an effect on the CGM parameters.</p> <p>The ratios of the placebo adjusted change in means between the active treatments within each subject will also be derived to estimate the magnitude of the dose response.</p> <p>Summary statistics will be presented for both the placebo adjusted change in means and the ratios of the placebo adjusted change in means. Analysis results will be presented for the change in means.</p> <p>Safety All safety parameters will be summarized and listed using descriptive statistics.</p>
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LIST OF ABBREVIATIONS AND DEFINITIONS OF TERMS

AE	adverse event
ALT	alanine aminotransferase
AST	aspartate aminotransferase
AUC	area under the curve
BP	blood pressure
BUN	blood urea nitrogen
CFR	Code of Federal Regulations
CGM	Continuous glucose monitoring
CRF	case report form
CRO	contract research organization
CRU	clinical research unit
CTCAE	Common Terminology Criteria for Adverse Events
DBP	diastolic blood pressure
ECG	electrocardiogram
EDC	electronic data capture
EDTA	ethylenediaminetetraacetic acid
EW	early withdrawal
FDA	Food and Drug Administration
GCP	Good Clinical Practice
GGT	gamma-glutamyltransferase
GI	gastrointestinal
GLP-1	glucagon-like peptide 1
HIPAA	Health Insurance Portability and Accountability Act of 1996
HIV	Human Immunodeficiency Virus
HR	heart rate
IB	Investigator's Brochure
ICF	informed consent form
ICH	International Council for Harmonization
IND	Investigational New Drug application
IRB	Institutional Review Board
IUD	intrauterine device
MedDRA	Medical Dictionary for Regulatory Activities
PD	Pharmacodynamic
PI	Principal Investigator
PK	Pharmacokinetic
SAE	serious adverse event
SBP	systolic blood pressure
SBTI	soybean trypsin inhibitor
SOP	standard operating procedure
T2DM	Type 2 diabetes mellitus
TEAE	treatment-emergent adverse event
TSH	thyroid stimulating hormone
ULN	upper limit of normal
WCBP	woman of childbearing potential

WHO World Health Organization

1 INTRODUCTION

Diabetes mellitus is a chronic metabolic disorder that has reached epidemic proportions in the United States, affecting almost 8% of the U.S. population in 2007, and worldwide (Centers for Disease Control and Prevention, 2008). Diabetes mellitus is defined by hyperglycemia (increased concentration of glucose in the blood) caused by defective insulin secretion (type 1), resistance to insulin action (type 2), or a combination of both. Diabetes mellitus leads to an increased risk of microvascular damage (retinopathy, nephropathy and neuropathy), reduced life expectancy, increased risk of macrovascular complications (ischemic heart disease, stroke, and peripheral vascular disease), and diminished quality of life. This illness requires continuing medical care and patient self-management and education to prevent acute complications and to reduce the risk of long-term complications (American Diabetes Association, 2009).

The World Health Organization has established diagnosis criteria for type 2 diabetes mellitus (T2DM) of fasting plasma glucose greater than or equal to 126 mg/dL (7.0 mmol/L), plasma glucose greater than or equal to 200 mg/dL (11.1 mmol/L) at 2 hours following ingestion of 75 g anhydrous glucose in an oral glucose tolerance test, or random plasma glucose greater than 200 mg/dL (11.1 mmol/L) in a person with symptoms of diabetes (World Health Organization, 2006). The treatment goal for patients with this disease is long-term glycemic control (over both fasting and non-fasting blood glucose levels), which has been demonstrated in both type 1 and type 2 patients to reduce the morbidities associated with uncontrolled glycemic levels (Diabetes Control and Complications Trial Research Group, 1993; Cleary et al., 2006; UK Prospective Diabetes Study Group, 1998a & 1998b). Typical options for glycemic control in patients with T2DM include lifestyle management (diet and exercise), exogenously administered insulin, insulin plus oral drugs such as metformin or sulfonylureas, and oral drugs alone. Glycemic control is measured by patient self-monitoring of blood glucose (SMBG), patient self-monitoring of interstitial glucose, and periodic blood tests for measurement of hemoglobin A1C (HbA1c). HbA1c levels reflect average glycemia over several months and therefore provide a surrogate for glycemic control (U.S. Food and Drug Administration, 2008). A consensus statement written by the American Diabetes Association and the European Association for the Study of Diabetes targets an HbA1c level of <7% as an objective for nonpregnant adults, who do not have complicating factors, for the prevention of micro- and macrovascular disease (Nathan et al., 2009).

In addition to lifestyle modification through diet and exercise, a number of treatments are available to treat hyperglycemia in diabetic patients. The choice of antihyperglycemic agents is made between physicians and patients based upon the agents' effectiveness in lowering glucose, other effects that can reduce long-term complications, safety, tolerability, ease of use, and expense. For example, metformin is widely prescribed as an initial therapy to improve glycemic control in patients with T2DM. It decreases hepatic glucose output and lowers fasting glycemia, thereby reducing HbA1c levels. It is generally well-tolerated, with possible gastrointestinal adverse events and low incidence of hypoglycemia, but is contraindicated in patients with renal dysfunction. Sulfonylureas lower glycemia by enhancing insulin secretion, and are effective in lowering HbA1c levels. Possible adverse events associated with this class of drugs include hypoglycemia (more frequent in elderly patients) and weight gain. Other drugs such as thiazolidinediones (TZDs), Glucagon-Like Peptide 1 (GLP-1) analogue, α -glucosidase inhibitors, glinides, and pramlintide are commercially available in the U.S., but are considered less well-

validated with respect to established use, efficacy, and cost-effectiveness for achieving target glycemic goals than lifestyle management, metformin, and sulfonylureas (Nathan et al., 2009).

Subcutaneously administered insulin is highly effective at lowering glycemia and helping patients achieve target HbA1c levels. Insulin has no overall dose limit with respect to safety and provides an improved lipid profile. However, subcutaneously administered insulin requires daily injections and blood glucose monitoring, and is associated with weight gain and an increased risk of hypoglycemia. Insulin is available as formulations with different pharmacokinetic (PK) and pharmacodynamic (PD) profiles (e.g, rapid, regular, intermediate, or long acting, or mixtures of these). These different formulations are used (Nathan et al., 2006) to tailor appropriate insulin regimens on a per patient basis.

Oramed Ltd. is developing a proprietary oral formulation of recombinant human insulin (ORMD-0801). Oramed, located in Jerusalem, Israel, was established in 2006 and the company's proprietary platform technology is based on over 25 years of medical research at the Hadassah University Medical Center in Jerusalem, Israel. In addition to ORMD-0801, which is the most advanced product in Oramed's pipeline, the pipeline also includes an insulin suppository, and a GLP-1 analogue.

ORMD-0801 is based on Oramed's platform technology for the oral delivery of polypeptides, which includes a proprietary formulation of excipients to facilitate oral uptake by hindering proteolysis in the small intestine and facilitating translocation of peptides across the gut epithelial lining, and into the systemic circulation. The formulation for ORMD-0801 includes aprotinin and soybean trypsin inhibitor (SBTI) to hinder proteolysis, and disodium ethylenediaminetetraacetic acid (EDTA) to facilitate translocation. The fish oil provides omega-3 fatty acids. The gelucire is used for its emulsifying properties. The enteric-coated capsules are designed to disintegrate in a pH-dependent manner in the small intestine. The initial indication for ORMD-0801 is to reduce fasting blood glucose in adult subjects with type 2 diabetes mellitus with the objective of controlling the overall average glycemic level.

The potential advantage of oral insulin in the treatment of elevated fasting blood glucose as compared to subcutaneously-administered insulin lies in its delivery to the hepatic portal vein. Orally-administered insulin, once transported across the gut wall, is ferried to the hepatic portal vein, mimicking the natural route of endogenous pancreatic insulin and delivering the insulin directly to the intended site of action. In contrast, subcutaneously-administered insulin reaches the liver through the systemic circulation thereby requiring higher systemic levels of insulin in order to achieve the same effect. Thus, oral insulin administration is expected to avoid systemic hyperinsulinemia and provide a markedly reduced risk of hypoglycemia. The PK/PD profile of ORMD-0801 is well-suited to the control of both fasting blood glucose and subsequent pre-meal blood glucose levels due to the delayed onset of glucose lowering activity. Therefore, Oramed is pursuing the oral administration of ORMD-0801 at bed time and one or two other times during the day for the improvement of glycemic control in adult subjects with type 2 diabetes mellitus.

Oramed has completed five Phase 1 safety studies of various formulations of ORMD-0801 in healthy human volunteers. Four Phase 2 studies have been completed, two in patients with type 2 diabetes, and two in patients with type 1 diabetes. These Phase 2 studies investigated different formulations, the effect of meals at different times following ORMD-0801 administration, and the effect of ORMD-0801 on glucose as measured by continuous glucose monitoring over a ten day treatment period with three doses per day prior to meals. Notably, one Phase 2 study

assessed the safety and effectiveness on fasting blood glucose of repeat bed time administration of ORMD-0801 in patients with type 2 diabetes over a period of 6 weeks. A Phase 1/2 dose-response study was also conducted. These studies demonstrated that the drug product is well-tolerated and can effectively reduce plasma glucose and C-peptide levels. There were no significant safety observations and no serious adverse reactions were reported for the completed studies, although there were two self-reported events of hypoglycemia in the six-week, Phase 2 study.

Oramed intends to continue with clinical development of ORMD-0801 under a U.S. IND application.

2 STUDY OBJECTIVES

2.1 Primary Objectives

- To compare pre-treatment (Day 3) to end of treatment (Day 8) 24-hour CGM glucose for single and multiple doses of ORMD-0801 vs placebo.
- To evaluate safety parameters for single and multiple doses of ORMD-0801 vs placebo.

2.2 Secondary Objectives

- To compare pre-treatment (Day 3) to end of treatment (Day 8) mean daytime CGM glucose for single and multiple doses of ORMD-0801 vs placebo.
- To compare pre-treatment (Day 3) to end of treatment (Day 8) mean nighttime CGM glucose for single and multiple doses of ORMD-0801 vs placebo.
- To compare pre-treatment (Day 3) to post-treatment washout (Day 9) 24-hour CGM glucose for single and multiple doses of ORMD-0801 vs placebo.
- To compare post-prandial glucose measurements for single and multiple doses of ORMD-0801 vs placebo.
- To compare pre-treatment (Day 3) to end of treatment (Day 8) insulin pharmacokinetics (PK) for single and multiple doses of ORMD-0801 vs placebo.
- To compare pre-treatment (Day 3) to end of treatment (Day 8) C-peptide pharmacodynamics (PD) for single and multiple doses of ORMD-0801 vs placebo.
- To compare defined events of hypoglycemia for single and multiple doses of ORMD-0801 vs placebo.

3 INVESTIGATIONAL PLAN

3.1 Overall Study Design and Plan

This study will enroll approximately 30 adult subjects with T2DM from age 20 to 75 inclusive. Following a 7-10 day Screening period, eligible subjects will enter a 3-day single-blind placebo run-in. On Day 4, each subject will be randomized to a treatment sequence that will include three treatment assignments for each of three treatment Periods according to the randomization scheme. All subjects will receive placebo plus two of the following: ORMD-0801 460 IU **qd**, ORMD-0801 **bid**, or ORMD-0801 **tid**. Subjects will receive the randomized treatment from Day

4 through Day 8. A 24-hour single-blind placebo washout will be done on Day 9. For all treatment Periods, pre-treatment CGM data will be collected for approximately 36 hours prior to treatment (Days 1-3). The cannula will be changed and the monitor will remain in place throughout the 5-day treatment period (Days 4-8) and for an additional 24 hours post-treatment (Day 9). Blood samples for PD analysis will be taken pre-treatment (Day 3) and at end of treatment (Day 8) to check for concentrations of insulin and C-peptide in the blood. In addition, adverse events, clinical laboratory values, vital signs, and electrocardiograms (ECGs) will be evaluated periodically for safety. Subjects will be discharged on the morning of Day 10. Each treatment Period will be separated by a 2-week washout. A final follow-up visit will be performed 1 week after the end of the third treatment period.

3.2 Screening (7 to 10 Days prior to Visit 2)

At the Screening Visit, potential subjects will be given a detailed oral presentation describing the nature, purpose, risks, and requirements of the study and will also receive detailed written information (ICF). They will have adequate opportunity to ask the appropriate person of the Investigational staff (i.e., Principal Investigator or designee) presenting the study about any aspect of the study.

Once the subject is satisfied that he/she is willing to participate in the study, he/she will be asked to sign the study ICF (refer to Section 11.1.4 for further detail regarding the ICF). The Investigational Site personnel obtaining written consent from the subject will also sign the form to confirm consent has been obtained.

Once signed, the Investigator will retain the original ICF for the subject's study records and provide the subject with a signed copy. The Investigator will verify that informed consent has been obtained from each subject prior to enrollment into the study and prior to the subject undergoing any study-related procedures.

Screening activities subsequent to obtaining informed consent will be conducted and consist of the following:

- Completion of medical and social history, including tobacco, alcohol, caffeine, and drug use;
- Collection of demographic data (sex, age, race/ethnicity);
- Review of prior and current medications and supplements;
- Review inclusion and exclusion criteria;
- Physical examination;
- 12-lead ECG;
- Measurement of vital signs (height, weight, seated SBP/DPB, and heart rate);
- Perform breathalyzer;
- Collection of fasted blood and urine samples for:
 - Clinical safety labs, including hematology, serum chemistry (with HbA1c, C-peptide,

and TSH), and urinalysis (see Section 6.3.5 for list of tests);

- Urine drug screen;
- Serum pregnancy test (WCBP only);
- Serum FSH (to test for women in early menopause);

For subjects who meet eligibility criteria based on the Screening assessments, instruct as follows:

- Use adequate contraceptive methods (see Section 4.1) for the duration of the study (Screening through Follow-Up Visit 3);
- Keep the use of concomitant medications at a minimum during the study, if possible, and avoid prohibited medications as defined in Section 5.7;
- Maintain their usual dietary habits for the periods of the study where they will not be housed in the CRU and avoid drastic changes, such as a conversion to a vegetarian diet;
- Refrain from any unusual or unaccustomed vigorous exercise during the course of the study;
- Refrain from excessive alcohol use or binge drinking during the study, and not to drink alcohol from 72 hours prior to admission to the CRU (Visit 2/Day 1) thru discharge from the CRU;
- Refrain from excessive caffeine use (i.e., more than five cups of caffeinated beverages per day) during the course of the study;

3.2.1 Screen Failure

A screen failure is defined as a subject who has signed the ICF, does not meet all the entry criteria outlined in Section 4 of this protocol (note that this includes assessments through Visit 2/Day 1), and was not randomized to receive study treatment (active or placebo).

The Investigator is responsible for keeping a record of all subjects screened for entry into the study and subsequently excluded. The reason(s) for exclusion will be recorded in the source documents and on the Screening log.

3.3 Visit 2 (Treatment Periods 1, 2, and 3)

3.3.1 Period 1

Subjects will report to the CRU on the morning of Day 1.

3.3.1.1 Day 1

- Review of medical history;
- Review of medications and supplements;
- Measurement of vital signs (weight, seated SBP/DPB, and heart rate);

- Provide the first dose of single-blind placebo at least 45 minutes prior to breakfast;
- Provide breakfast;
- Subjects will be fitted with the continuous glucose monitoring (CGM) device and data recording will begin;
- Provide 4 doses (8 capsules) of single-blind placebo and instruct subjects to take one dose at least 45 minutes before lunch, one dose at bedtime, one dose at least 45 minutes before breakfast on Day 2, and one dose at least 45 minutes before lunch on Day 2.
- Adverse events will be monitored and recorded.
- Subjects will be instructed to return to the CRU at approximately 5pm (± 30 minutes) on Day 2.

3.3.1.2 Day 2

- Admission to the CRU at approximately 5pm (± 30 minutes);
- Review of medications and supplements;
- Measurement of vital signs (weight, seated SBP/DPB, heart rate, and temperature);
- Perform breathalyzer;
- Collect a urine sample for:
 - Drug screen;
 - Pregnancy testing (WCBP only)
- Provide a standardized diabetic meal at approximately 7pm (± 60 minutes). Standardized meals will continue throughout the remainder of the study Period.
- Provide a dose of single-blind placebo at approximately 10pm (± 60 minutes).
- Continue CGM monitoring;
- Adverse events will be monitored and recorded.

3.3.1.3 Day 3

- Review of medications and supplements;
- Measurement of vital signs (weight, seated SBP/DPB, heart and rate);
- Provide a dose of single-blind placebo at approximately 7am (± 60 minutes);
- Provide breakfast no sooner than 45 minutes after the morning dose;
- Provide a dose of single-blind placebo at approximately 1pm (± 60 minutes), at least 45 minutes prior to lunch;
- Provide lunch no sooner than 45 minutes after the afternoon dose;

- Provide dinner at approximately 7pm (\pm 60 minutes);
- Provide a dose of single-blind placebo at approximately 10pm (\pm 60 minutes);
- Collect a blood sample according to schedule (per randomization scheme, either morning, afternoon, or evening) prior to the specified dose of placebo for:
 - Pre-dose PD analysis
 - Serum chemistry
- Collect scheduled (per randomization scheme) postdose PD blood draws every 30 minutes (\pm 5 minutes) until 5 hours has elapsed;
- Replace the CGM cannula at approximately 7pm (\pm 60 minutes), such that it does not interfere with any post-dose PD blood draws;
- Adverse events will be monitored and recorded.

3.3.1.4 Day 4

- Review of medications and supplements;
- Measurement of vital signs (weight, seated SBP/DPB, and heart rate);
- Randomization
- Provide a dose of study treatment or placebo at approximately 7am (\pm 60 minutes);
- Provide breakfast no sooner than 45 minutes after the morning dose;
- Provide a dose of study treatment or placebo at approximately 1pm (\pm 60 minutes), at least 45 minutes prior to lunch;
- Provide lunch no sooner than 45 minutes after the afternoon dose;
- Provide dinner at approximately 7pm (\pm 60 minutes);
- Provide a dose of study treatment or placebo at approximately 10pm (\pm 60 minutes);
- Continue CGM monitoring;
- Adverse events will be monitored and recorded.

3.3.1.5 Days 5-7

- Review of medications and supplements;
- Measurement of vital signs (weight, seated SBP/DPB, and heart rate);
- Provide a dose of study treatment or placebo at approximately 7am (\pm 60 minutes);
- Provide breakfast no sooner than 45 minutes after the morning dose;
- Provide a dose of study treatment or placebo at approximately 1pm (\pm 60 minutes);

- Provide lunch no sooner than 45 minutes after the afternoon dose;
- Provide dinner at approximately 7pm (\pm 60 minutes);
- Provide a dose of study treatment or placebo at approximately 10pm (\pm 60 minutes);
- Continue CGM monitoring;
- Adverse events will be monitored and recorded.

3.3.1.6 Day 8

- Review of medications and supplements;
- Measurement of vital signs (weight, seated SBP/DPB, and heart rate);
- Provide a dose of study treatment or placebo at approximately 7am (\pm 60 minutes);
- Provide breakfast no sooner than 45 minutes after the morning dose;
- Provide a dose of study treatment or placebo at approximately 1pm (\pm 60 minutes);
- Provide lunch no sooner than 45 minutes after the afternoon dose;
- Provide dinner at approximately 7pm (\pm 60 minutes);
- Provide a dose of study treatment or placebo at approximately 10pm (\pm 60 minutes);
- Collect a blood sample according to schedule (per randomization scheme, either morning, afternoon, or evening) prior to the specified dose of placebo for:
 - Pre-dose PD analysis
 - Serum chemistry
- Collect scheduled (per randomization scheme) postdose PD blood draws every 30 minutes (\pm 5 minutes) until 5 hours has elapsed;
- Continue CGM monitoring;
- Adverse events will be monitored and recorded.

3.3.1.7 Day 9

- Review of medications and supplements;
- Measurement of vital signs (weight, seated SBP/DPB, and heart rate);
- Provide a dose of single-blind placebo at approximately 7am (\pm 60 minutes);
- Provide breakfast no sooner than 45 minutes after the morning dose;
- Provide a dose of single-blind placebo at approximately 1pm (\pm 60 minutes);
- Provide lunch no sooner than 45 minutes after the afternoon dose;

- Provide dinner at approximately 7pm (\pm 60 minutes);
- Provide a dose of single-blind placebo at approximately 10pm (\pm 60 minutes);
- Continue CGM monitoring;
- Adverse events will be monitored and recorded.

3.3.1.8 Day 10

- Review of medications and supplements;
- Measurement of vital signs (weight, seated SBP/DPB, and heart rate);
- Remove the CGM monitor; download CGM data;
- Provide breakfast;
- Adverse events will be monitored and recorded.
- Subjects will be discharged for a minimum 2-week washout period.

3.3.2 Period 2

Subjects will report to the CRU on the morning of Day 1.

3.3.2.1 Day 1

- Review of medical history;
- Review of medications and supplements;
- Measurement of vital signs (weight, seated SBP/DPB, and heart rate);
- Provide the first dose of single-blind placebo at least 45 minutes prior to breakfast;
- Provide breakfast;
- Subjects will be fitted with the continuous glucose monitoring (CGM) device and data recording will begin;
- Provide 4 doses of single-blind placebo and instruct subjects to take one dose at least 45 minutes before lunch, one dose at bedtime, one dose at least 45 minutes before breakfast on Day 2, and one dose at least 45 minutes before lunch on Day 2.
- Adverse events will be monitored and recorded.
- Subjects will be instructed to return to the CRU at approximately 5pm (\pm 30 minutes) on Day 2.

3.3.2.2 Day 2

- Admission to the CRU at approximately 5pm (\pm 30 minutes);
- Review of medications and supplements;

- Measurement of vital signs (weight, seated SBP/DPB, heart rate, and temperature);
- Perform breathalyzer;
- Collect a urine sample for:
 - Drug screen;
 - Pregnancy testing (WCBP only)
- Provide a standardized diabetic meal at approximately 7pm (\pm 60 minutes). Standardized meals will continue throughout the remainder of the study Period.
- Provide a dose of single-blind placebo at approximately 10pm (\pm 60 minutes).
- Continue CGM monitoring;
- Adverse events will be monitored and recorded.

3.3.2.3 Day 3

- Review of medications and supplements;
- Measurement of vital signs (weight, seated SBP/DPB, heart and rate);
- Provide a dose of single-blind placebo at approximately 7am (\pm 60 minutes);
- Provide breakfast no sooner than 45 minutes after the morning dose;
- Provide a dose of single-blind placebo at approximately 1pm (\pm 60 minutes), at least 45 minutes prior to lunch;
- Provide lunch no sooner than 45 minutes after the afternoon dose;
- Provide dinner at approximately 7pm (\pm 60 minutes);
- Provide a dose of single-blind placebo at approximately 10pm (\pm 60 minutes);
- Collect a blood sample according to schedule (per randomization scheme, either morning, afternoon, or evening) prior to the specified dose of placebo for:
 - Pre-dose PD analysis
 - Serum chemistry
- Collect scheduled (per randomization scheme) postdose PD blood draws every 30 minutes (\pm 5 minutes) until 5 hours has elapsed;
- Replace the CGM cannula at approximately 7pm (\pm 60 minutes), such that it does not interfere with any post-dose PD blood draws;
- Adverse events will be monitored and recorded.

3.3.2.4 Day 4

- Review of medications and supplements;
- Measurement of vital signs (weight, seated SBP/DPB, and heart rate);
- Randomization
- Provide a dose of study treatment or placebo at approximately 7am (\pm 60 minutes);
- Provide breakfast no sooner than 45 minutes after the morning dose;
- Provide a dose of study treatment or placebo at approximately 1pm (\pm 60 minutes), at least 45 minutes prior to lunch;
- Provide lunch no sooner than 45 minutes after the afternoon dose;
- Provide dinner at approximately 7pm (\pm 60 minutes);
- Provide a dose of study treatment or placebo at approximately 10pm (\pm 60 minutes);
- Continue CGM monitoring;
- Adverse events will be monitored and recorded.

3.3.2.5 Days 5-7

- Review of medications and supplements;
- Measurement of vital signs (weight, seated SBP/DPB, and heart rate);
- Provide a dose of study treatment or placebo at approximately 7am (\pm 60 minutes);
- Provide breakfast no sooner than 45 minutes after the morning dose;
- Provide a dose of study treatment or placebo at approximately 1pm (\pm 60 minutes);
- Provide lunch no sooner than 45 minutes after the afternoon dose;
- Provide dinner at approximately 7pm (\pm 60 minutes);
- Provide a dose of study treatment or placebo at approximately 10pm (\pm 60 minutes);
- Continue CGM monitoring;
- Adverse events will be monitored and recorded.

3.3.2.6 Day 8

- Review of medications and supplements;
- Measurement of vital signs (weight, seated SBP/DPB, and heart rate);
- Provide a dose of study treatment or placebo at approximately 7am (\pm 60 minutes);
- Provide breakfast no sooner than 45 minutes after the morning dose;

- Provide a dose of study treatment or placebo at approximately 1pm (\pm 60 minutes);
- Provide lunch no sooner than 45 minutes after the afternoon dose;
- Provide dinner at approximately 7pm (\pm 60 minutes);
- Provide a dose of study treatment or placebo at approximately 10pm (\pm 60 minutes);
- Collect a blood sample according to schedule (per randomization scheme, either morning, afternoon, or evening) prior to the specified dose of placebo for:
 - Pre-dose PD analysis
 - Serum chemistry
- Collect scheduled (per randomization scheme) postdose PD blood draws every 30 minutes (\pm 5 minutes) until 5 hours has elapsed;
- Continue CGM monitoring;
- Adverse events will be monitored and recorded.

3.3.2.7 Day 9

- Review of medications and supplements;
- Measurement of vital signs (weight, seated SBP/DPB, and heart rate);
- Provide a dose of single-blind placebo at approximately 7am (\pm 60 minutes);
- Provide breakfast no sooner than 45 minutes after the morning dose;
- Provide a dose of single-blind placebo at approximately 1pm (\pm 60 minutes);
- Provide lunch no sooner than 45 minutes after the afternoon dose;
- Provide dinner at approximately 7pm (\pm 60 minutes);
- Provide a dose of single-blind placebo at approximately 10pm (\pm 60 minutes);
- Continue CGM monitoring;
- Adverse events will be monitored and recorded.

3.3.2.8 Day 10

- Review of medications and supplements;
- Measurement of vital signs (weight, seated SBP/DPB, and heart rate);
- Remove the CGM monitor; download CGM data;
- Provide breakfast;
- Adverse events will be monitored and recorded.

- Subjects will be discharged for a minimum 2-week washout period.

3.3.3 Period 3

Subjects will report to the CRU on the morning of Day 1.

3.3.3.1 Day 1

- Review of medical history;
- Review of medications and supplements;
- Measurement of vital signs (weight, seated SBP/DPB, and heart rate);
- Provide the first dose of single-blind placebo at least 45 minutes prior to breakfast;
- Provide breakfast;
- Subjects will be fitted with the continuous glucose monitoring (CGM) device and data recording will begin;
- Provide 4 doses of single-blind placebo and instruct subjects to take one dose at least 45 minutes before lunch, one dose at bedtime, one dose at least 45 minutes before breakfast on Day 2, and one dose at least 45 minutes before lunch on Day 2.
- Adverse events will be monitored and recorded.
- Subjects will be instructed to return to the CRU at approximately 5pm (± 30 minutes) on Day 2.

3.3.3.2 Day 2

- Admission to the CRU at approximately 5pm (± 30 minutes);
- Review of medications and supplements;
- Measurement of vital signs (weight, seated SBP/DPB, heart rate, and temperature);
- Perform breathalyzer;
- Collect a urine sample for:
 - Drug screen;
 - Pregnancy testing (WCBP only)
- Provide a standardized diabetic meal at approximately 7pm (± 60 minutes). Standardized meals will continue throughout the remainder of the study Period.
- Provide a dose of single-blind placebo at approximately 10pm (± 60 minutes).
- Continue CGM monitoring;
- Adverse events will be monitored and recorded.

3.3.3.3 Day 3

- Review of medications and supplements;
- Measurement of vital signs (weight, seated SBP/DPB, heart and rate);
- Provide a dose of single-blind placebo at approximately 7am (\pm 60 minutes);
- Provide breakfast no sooner than 45 minutes after the morning dose;
- Provide a dose of single-blind placebo at approximately 1pm (\pm 60 minutes), at least 45 minutes prior to lunch;
- Provide lunch no sooner than 45 minutes after the afternoon dose;
- Provide dinner at approximately 7pm (\pm 60 minutes);
- Provide a dose of single-blind placebo at approximately 10pm (\pm 60 minutes);
- Collect a blood sample according to schedule (per randomization scheme, either morning, afternoon, or evening) prior to the specified dose of placebo for:
 - Pre-dose PD analysis
 - Serum chemistry
- Collect scheduled (per randomization scheme) postdose PD blood draws every 30 minutes (\pm 5 minutes) until 5 hours has elapsed;
- Replace the CGM cannula at approximately 7pm (\pm 60 minutes), such that it does not interfere with any post-dose PD blood draws;
- Adverse events will be monitored and recorded.

3.3.3.4 Day 4

- Review of medications and supplements;
- Measurement of vital signs (weight, seated SBP/DPB, and heart rate);
- Randomization
- Provide a dose of study treatment or placebo at approximately 7am (\pm 60 minutes);
- Provide breakfast no sooner than 45 minutes after the morning dose;
- Provide a dose of study treatment or placebo at approximately 1pm (\pm 60 minutes), at least 45 minutes prior to lunch;
- Provide lunch no sooner than 45 minutes after the afternoon dose;
- Provide dinner at approximately 7pm (\pm 60 minutes);
- Provide a dose of study treatment or placebo at approximately 10pm (\pm 60 minutes);

- Continue CGM monitoring;
- Adverse events will be monitored and recorded.

3.3.3.5 Days 5-7

- Review of medications and supplements;
- Measurement of vital signs (weight, seated SBP/DPB, and heart rate);
- Provide a dose of study treatment or placebo at approximately 7am (\pm 60 minutes);
- Provide breakfast no sooner than 45 minutes after the morning dose;
- Provide a dose of study treatment or placebo at approximately 1pm (\pm 60 minutes);
- Provide lunch no sooner than 45 minutes after the afternoon dose;
- Provide dinner at approximately 7pm (\pm 60 minutes);
- Provide a dose of study treatment or placebo at approximately 10pm (\pm 60 minutes);
- Continue CGM monitoring;
- Adverse events will be monitored and recorded.

3.3.3.6 Day 8

- Review of medications and supplements;
- Measurement of vital signs (weight, seated SBP/DPB, and heart rate);
- Provide a dose of study treatment or placebo at approximately 7am (\pm 60 minutes);
- Provide breakfast no sooner than 45 minutes after the morning dose;
- Provide a dose of study treatment or placebo at approximately 1pm (\pm 60 minutes);
- Provide lunch no sooner than 45 minutes after the afternoon dose;
- Provide dinner at approximately 7pm (\pm 60 minutes);
- Provide a dose of study treatment or placebo at approximately 10pm (\pm 60 minutes);
- Collect a blood sample according to schedule (per randomization scheme, either morning, afternoon, or evening) prior to the specified dose of placebo for:
 - Pre-dose PD analysis
 - Serum chemistry
- Collect scheduled (per randomization scheme) postdose PD blood draws every 30 minutes (\pm 5 minutes) until 5 hours has elapsed;
- Continue CGM monitoring;

- Adverse events will be monitored and recorded.

3.3.3.7 Day 9

- Review of medications and supplements;
- Measurement of vital signs (weight, seated SBP/DPB, and heart rate);
- Provide a dose of single-blind placebo at approximately 7am (\pm 60 minutes);
- Provide breakfast no sooner than 45 minutes after the morning dose;
- Provide a dose of single-blind placebo at approximately 1pm (\pm 60 minutes);
- Provide lunch no sooner than 45 minutes after the afternoon dose;
- Provide dinner at approximately 7pm (\pm 60 minutes);
- Provide a dose of single-blind placebo at approximately 10pm (\pm 60 minutes);
- Continue CGM monitoring;
- Adverse events will be monitored and recorded.

3.3.3.8 Day 10

- Review of medications and supplements;
- Measurement of vital signs (weight, seated SBP/DPB, and heart rate);
- Remove the CGM monitor; download CGM data;
- Provide breakfast;
- Adverse events will be monitored and recorded.
- Subjects will be discharged until the 1-week follow-up visit.

3.4 Follow-up Visit (Visit 3, 7 to 9 Days after the end of Visit 2, Period 3)

Subjects will return to the clinic 7 to 9 days after Visit 2/Day 10 (approximately 65 days since the beginning of the study) and the following procedures will be performed:

- Review of medications and supplements;
- Vital signs (including weight, seated SBP/DPB, and heart rate);
- Physical examination;
- Collection of blood and urine samples for:
 - Clinical safety labs, including hematology, serum chemistry, and urinalysis (see Section 6.3.5 for list of tests);

- Record adverse events;
- Discharge from the study.

Any subject with a possible study treatment related AE at the Follow-Up Visit will be followed until resolution or stabilization of the event. Further, any SAE, whether or not related to study treatment, that occurs within 30 days following the last dose of study treatment will be followed until resolution or stabilization of the event. This may require additional clinical assessments and laboratory tests. The follow-up results will be recorded in the subject's source documentation and in the CRF.

3.5 Early Withdrawal (EW)

If a randomized subject is withdrawn from the study prior to completing study treatment, the subject will be discharged from the CRU and instructed to return to the clinic the next day and the following procedures will be performed:

- Review of medications and supplements;
- Vital signs (including weight, seated SBP/DPB, and heart rate);
- Physical examination;
- Collection of blood and urine samples for:
 - Clinical safety labs, including hematology, serum chemistry, and urinalysis (see Section 6.3.5 for list of tests);
- Record adverse events;
- Discharge from the study.

If a randomized subject is withdrawn from the study prior to completing all three treatment periods, the subject will be discharged from the CRU and instructed to return to the clinic the next day for Follow-Up evaluations as performed for Visit 3.

Any subject with a possible study treatment related AE at the time of EW will be followed until resolution or stabilization of the event.

3.6 Schedule of Events

Table 1 below describes the daily schedule of events from Screening Visit 1 through Follow-Up Visit 3.

Table 1: Daily Schedule of Events from Screening Through Follow-Up Visit

Visit	Screening Visit 1	Treatment Visit 2 Periods 1, 2, and 3										Follow-Up Visit 3	EW		
		Study Day	Day -7 to -10	1	2	3	4	5	6	7	8			9	10
Informed Consent	X														
Medical History	X	X													
Demographics	X														
Concomitant Medications	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Inclusion/Exclusion Criteria	X														
Physical Exam	X												X	X	
ECG	X														
Vital Signs ¹	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Hematology/Chemistry/Urinalysis ²	X ²			X ²						X ²			X ²	X ²	
Urine Drug Screen	X		X												
Breathalyzer	X		X												
Serum Pregnancy Test ³	X														
Urine Pregnancy Test ³			X												
Placebo Administration ⁴		X	X	X							X				
CGM Monitoring ⁵		X	X	X	X	X	X	X	X	X	X				
CRU Admission			X												
Standardized Diabetic Meals ⁶		X	X	X	X	X	X	X	X	X	X				
Pharmacodynamic Samples ⁷				X					X						
Remove CGM and Download Data											X				
Randomization/Crossover ⁸					X										
Treatment Administration ⁹					X	X	X	X	X						
CRU Discharge											X				
Adverse Events		X	X	X	X	X	X	X	X	X	X	X	X	X	
Study Disposition												X	X		

- ¹Vital signs include height, weight, heart rate, systolic BP, and diastolic BP. Height will be measured at Screening only. Temperature will be measured at Visit 2/Day 2 only, prior to admission.
- ²Screening labs will include standard hematology/chemistry/urinalysis, plus HbA_{1c}, C-peptide, and TSH. FSH will also be performed for women who are pre-menopausal. On Visit 2 Days 3 and 8, chemistry analysis will be performed without hematology or urinalysis. Visit 3 and EW labs will include standard hematology/chemistry/urinalysis.
- ³Pregnancy tests will be performed for women of childbearing potential only.
- ⁴A single dose of placebo will be administered on the morning of Day 1. Subjects will be dispensed the next 4 doses (8 capsules) with dosing instructions. On Day 3 and Day 9, doses will be administered at approximately 7am (±60 minutes), 1pm (±60 minutes), and 10pm (±60 minutes).
- ⁵The CGM monitor will be fitted on Day 1, the cannula will be changed on Day 3 at approximately 7pm (±60 minutes), and the monitor will continue recording measurements until the morning of Day 10.
- ⁶A standardized breakfast will be provided on Day 1. Beginning with dinner on Day 2 and ending with breakfast on Day 10, breakfast and lunch will be provided no sooner than 45 minutes after corresponding treatment doses. Dinner will be provided at approximately 7pm (±60 minutes). Standardized snacks will be provided between breakfast and lunch, between lunch and dinner, and between dinner and bedtime.
- ⁷Blood samples (scheduled per randomization scheme) for insulin and C-peptide will be drawn pre-dose and every 30 minutes (± 5 minutes) postdose until 5 hours has elapsed.
- ⁸Randomization will occur on the morning of Period 1/Day 4. Crossover will occur on the morning of Period 2/Day 4 and then again on the morning of Period 3/Day 4.
- ⁹Subjects will receive their assigned randomized treatment from the morning of Day 4 through the evening of Day 8. Doses will be administered at approximately 7am (±60 minutes), 1pm (±60 minutes), and 10pm (±60 minutes).

4 STUDY SUBJECT SELECTION

4.1 Inclusion Criteria

Each subject must meet all of the following criteria to be eligible for the study:

1. Male or female subjects, age 20 to 75 years, inclusive with type 2 diabetes mellitus.
2. At Visit 2/Period 1/Day 1, subjects will have been treated for their diabetes by metformin (≥ 1000 mg/day; any type and regimen), metformin and a DPP-4 inhibitor, metformin and an SGLT-2 inhibitor, metformin and TDZ, or metformin and sulfonylurea. Subjects will have been on a stable regimen of metformin (defined as the same metformin dose and type) and other treatments for at least 8 weeks prior to Visit 2/Period 1/Day 1.
3. Body Mass Index (BMI) between 25 and 40 kg/m², inclusive, at Screening.
4. Hemoglobin A1c (HbA_{1c}) between ≥ 7.5 and $\leq 10.5\%$ at Screening.
5. Fasting serum glucose greater than or equal to 126 mg/dL at Screening.
6. Females of childbearing potential must have a negative serum pregnancy test result at Screening and a negative urine pregnancy test at Visit 2/Day 1 for all study Periods.
 - a. Females who are not of childbearing potential are defined as:
 - i. Postmenopausal (defined as at least 12 months with no menses in women ≥ 45 years of age)
 - ii. Has had a hysterectomy and/or bilateral oophorectomy, bilateral salpingectomy, or bilateral tubal ligation/occlusion at least 6 weeks prior to screening; OR
 - iii. Has a congenital or acquired condition that prevents childbearing.
 - b. Females of childbearing potential agree to avoid becoming pregnant while receiving study treatment and for 14 days after the last dose of study treatment by complying with one of the following:
 - i. practice abstinence[†] from heterosexual activity OR
 - ii. Use (or have her partner use) acceptable contraception during heterosexual activity. Acceptable methods of contraception are[‡]:
 1. Single method (one of the following is acceptable):
 - a. Non-hormonal intrauterine device (IUD)
 - b. vasectomy of a female subject's male partner
 2. Combination method (requires use of two of the following):
 - a. diaphragm with spermicide (cannot be used in conjunction with cervical cap/spermicide)
 - b. cervical cap with spermicide (nulliparous women only)
 - c. contraceptive sponge (nulliparous women only)
 - d. male condom or female condom (cannot be used together)

†Abstinence (relative to heterosexual activity) can be used as the sole method of contraception if it is consistently employed as the subject's preferred and usual lifestyle and if considered acceptable by local regulatory agencies and ERCs/IRBs. Periodic abstinence (e.g., calendar, ovulation, sympto-thermal, post-ovulation methods, etc.) and withdrawal are not acceptable methods of contraception.

‡If a contraceptive method listed above is restricted by local regulations/guidelines, then it does not qualify as an acceptable method of contraception for subjects participating at sites in this country/region.

4.2 Exclusion Criteria

Subjects who meet any of the following criteria must be excluded from the study:

1. Usage of anti-diabetic agents other than metformin, sulfonylurea, SGLT-2 inhibitors, TZD, or DPP-4 inhibitors within 6 weeks prior to Visit 2/Period 1/Day 1.
2. Presence of any clinically significant endocrine disease according to the Investigator (euthyroid subjects on replacement therapy will be included if the dosage of thyroxine is stable for at least six weeks prior to Screening).
3. Clinical diagnosis of type 1 diabetes.
4. Fasting serum glucose >300 mg/dL at Screening; a single repeat test is allowable.
5. Evidence of unawareness of hypoglycemia, a documented plasma glucose ≤ 50 mg/dL in the absence of symptoms of hypoglycemia at Screening.
6. Presence of any clinically significant condition (in the opinion of the Investigator) that might interfere with the evaluation of study medication, such as significant renal, hepatic, gastrointestinal (GI), cardiovascular (CV), immune disease, blood dyscrasias or any disorders causing hemolysis or unstable red blood cells, or clinically important hematological disorders (i.e. aplastic anemia, myeloproliferative or myelodysplastic syndromes, thrombocytopenia) at Screening.
7. Presence or history of cancer within the past 5 years of Screening, with the exception of adequately-treated localized basal cell skin cancer or in situ uterine cervical cancer.
 - a. A subject with a history of malignancy >5 years prior to Screening should have no evidence of residual or recurrent disease.
 - b. A subject with a history of melanoma, leukemia, lymphoma, or renal carcinoma is excluded.
8. Laboratory abnormalities at Screening including:
 - a) C-peptide < 1.0 ng/mL
 - b) Positive pregnancy test in females of childbearing potential (at Screening and Visit 2/Periods 1-3/Day 1)
 - c) Abnormal serum thyrotropin (TSH) levels below the lower limit of normal or $>1.5X$ the upper limit of normal
 - d) Elevated liver enzymes (alanine transaminase (ALT), alanine aminotransferase (AST), alkaline phosphatase) $>2X$ the upper limit of normal.
 - e) Very high triglyceride levels (>600 mg/dL); a single repeat test is allowable.

- f) Any relevant abnormality that would interfere with the efficacy or the safety assessments during study treatment administration.
9. Positive history of active liver disease (other than non-alcoholic hepatic steatosis), including chronic hepatitis B or C, primary biliary cirrhosis, or active symptomatic gallbladder disease.
10. Positive history of HIV.
11. Use of the following medications:
 - a) History of use of insulin for more than 1 week within 6 months prior to and none within 6 weeks prior to Visit 2/Period 1/Day 1.
 - b) History of use of aprotinin at any time prior to Screening (e.g., Trasylol, any type or dose).
 - c) Administration of thyroid preparations or thyroxine (except in subjects on stable replacement therapy) within 6 weeks prior to Screening.
 - d) Administration of systemic long-acting corticosteroids within two months or prolonged use (more than one week) of other systemic corticosteroids or inhaled corticosteroids (if daily dosage is > 1,000 µg equivalent beclomethasone) within 30 days prior to Screening. Intra-articular and/or topical corticosteroids are not considered systemic.
 - e) Use of medications known to modify glucose metabolism or to decrease the ability to recover from hypoglycemia such as oral, parenteral, and inhaled steroids (as discussed above), and immunosuppressive or immunomodulating agents.
12. Known allergy to soy or aprotinin.
13. Subject is on a weight loss program and is not in the maintenance phase, or subject has started weight loss medication (e.g., orlistat or liraglutide), within 8 weeks prior to Screening. Subjects who have had bariatric surgery are also excluded.
14. Subject is pregnant or breast-feeding.
15. Subject has a Screening systolic blood pressure ≥ 165 mmHg or diastolic blood pressure ≥ 100 mmHg. Subjects will be allowed to take a BP rescue medication.
16. Subject is a user of recreational or illicit drugs or has had a recent history (within 1 year of Screening) of drug or alcohol abuse or dependence. (Note: Alcohol abuse includes heavy alcohol intake as defined by >3 drinks per day or >14 drinks per week, or binge drinking) at Screening.
17. Any clinically significant ECG abnormality at Screening or cardiovascular disease. Clinically significant cardiovascular disease will include:
 - a) History of stroke, transient ischemic attack, or myocardial infarction within 6 months prior to Screening,
 - b) History of or currently have New York Heart Associate Class II-IV heart failure prior to Screening, or
18. One or more contraindications to metformin.
19. History of gastrointestinal disorders (e.g. hypochlorhydria) with the potential to interfere with drug absorption.

20. At the Principal Investigator's discretion, any condition or other factor that is deemed unsuitable for subject enrollment into the study.

4.3 Subject and Trial Discontinuation

Subjects may choose to withdraw from this study at any time for any reason without penalty of jeopardizing their health care or loss of benefits to which the subject is otherwise entitled.

Within the provisions of informed consent and good clinical judgment with respect to safety, every attempt will be made to have subjects complete the study. The following are reasons to terminate a subject's participation in the study:

1. Subject experiences an AE that in the judgement of the Investigator poses a significant risk to the subject for continued participation in the study.
2. Subject uses a prohibited medication (listed in Section 5.7) that in the judgment of the Investigator poses a significant risk to the subject for continued participation in the study or that will interfere with the interpretation of the results of the study.
3. Subject becomes pregnant.
4. Significant protocol violation or noncompliance on the part of the subject or the Investigator.
5. Intercurrent illness that requires treatment that is not consistent with the protocol requirements, or intercurrent illness or the associated treatment that in the judgment of the Investigator poses a significant risk to the subject for continued participation in the study.
6. Subject wishes to withdraw for any reason.
7. Sponsor elects to end the study, or the Investigational Site elects to end the study at their site.
8. Any other reason that in the judgment of the Investigator poses unacceptable risk to the subject.

Reasons for study drug discontinuation may include the following:

1. Pregnancy
2. Adverse event
3. Episodes of hypoglycemia as defined in Section 7.3.1.
4. Patient meets one of the exclusion criteria during the study
5. Any clinically significant change in the patient's medical condition

The occurrence of severe hypoglycemia (as defined in Section 7.3.1) in two patients during the double-blind treatment period will lead to unblinding of the treatment in those two patients.

Patients who withdraw from the study prior to treatment may be replaced. Patients who are withdrawn and have received at least one treatment will not be replaced. Patients who discontinue study drug treatment will not be replaced.

Except in cases of emergency, the Investigator should consult with the Sponsor and the Medical Monitor before removing the subject from the study. In some circumstances it may be necessary to temporarily interrupt treatment as a result of AEs that may have an unclear relationship to study treatment. The Investigator should obtain approval from the Sponsor and Medical Monitor before restarting study treatments that were temporarily discontinued for an AE.

In the event that a subject discontinues the study prior to completion, the date the subject is withdrawn and the reason for discontinuation will be recorded in the source documents and CRF. Although a subject will not be obliged to give his/her reason for withdrawing prematurely, the Investigator will make a reasonable effort to obtain the reason while fully respecting the subject's rights.

All subjects who are randomized and treated (i.e., received any amount of study treatment) will be included in the safety analyses. Thus, every effort will be made to contact any subject who fails to attend any follow-up appointments/contacts, in order to ensure that he/she is in satisfactory health. If a subject withdraws from the study as a result of meeting discontinuation criteria after the start of study treatment administration, reasonable efforts should be made to have the subject return for the early withdrawal evaluations (Section 3.5). Any subject withdrawn due to a suspected study treatment -related AE should be followed until resolution or stabilization of the event.

If a subject becomes pregnant, study treatment will be discontinued immediately, and the subject will be referred to an obstetrician/gynecologist experienced in reproductive toxicity for further evaluation and counseling. The subject will be followed until delivery or other termination of pregnancy for outcome.

Subjects may choose to withdraw authorization to use and disclose their PHI as defined by the HIPAA. Such withdrawal of authorization must be made to the Investigator in writing. Any PHI collected by the Investigator prior to the date of such withdrawal will continue to be used and disclosed.

Randomized subjects who are discontinued from this study for any reason will not be replaced.

The Sponsor has the right to terminate this study, and the Investigator/Investigational Site has the right to close the site, at any time, although this should occur only after consultation between involved parties. The Investigator will notify the IRB in writing of a premature termination of a study or closure of Investigational Site, and will send a copy of the notification to the Sponsor.

Events that may trigger premature termination of a study or closure of an Investigational Site include, but are not limited to, a new toxicity finding, a request to discontinue the trial from a regulatory authority, non-compliance with the protocol, GCP violations, slow recruitment/low enrollment, or change in development plans for the study treatment.

If either of the criteria listed below is met, enrollment of new subjects and dosing of ongoing subjects will be temporarily stopped. The Investigator, Sponsor, and the Medical Monitor will discuss whether a lower dose or any additional treatment guidelines should be implemented, or if the trial should be permanently stopped. Any proposed changes to the protocol to address such findings will be submitted for review and approval by the IRB and FDA prior to re-starting the trial.

1. A death within 30 days after study treatment administration where there is a reasonable possibility that the drug caused the event;
2. Two Grade 4 AEs where there is a reasonable possibility that the study treatment caused the events.

5 STUDY TREATMENT

5.1 Description of Investigational Drug

Active:

Code name: ORMD-0801

Dosage form: 2 soft gel capsules per dose

Strength: 230 IU insulin (8 mg insulin) per capsule

Description: API (recombinant human insulin USP), in Oramed's proprietary formulation [aprotinin, SBTI, disodium EDTA, fish oil, and TWEEN 80] in capsules.

Placebo control:

Fish oil in capsules, identical in appearance to ORMD-0801

Note: 230 IU Insulin and placebo capsules are all identical in appearance.

5.1.1 Packaging and Labeling

This study is a double-blind, double-dummy study. The Investigational Site pharmacist will be responsible for dispensing the appropriate treatment period study treatment based on the randomization schedule. For each treatment period dose, the pharmacist will remove the capsules from the bottle before providing the capsules to the Investigational Site personnel.

Shipments of placebo capsules for the run-in period will be clearly labeled to indicate they should be used during this patient-blinded stage of the study. Shipments of study medication for the double-blinded treatment period will be received in blinded packages so that the Investigator, staff, and patients will be blinded to the treatment. Study medication will be dispensed to the site with instructions for when treatment can be administered and with a diary for recording administration of study medication. Medication containers and any unused capsules will be retained at the study site after the treatment phase of the trial is complete.

The treatment packages will be labeled with the following information:

- Study number
- Patient ID
- Kit No./Bottle ID
- Dosage Form/Content
- Directions for use, including route of administration
- Number of capsules in package
- Storage conditions
- Instructions to "keep out of reach of children"
- Caution: New Drug – Limited by Federal (or United States) law to investigational use.
- Name of Sponsor

A separate label with the identical information will be provided with the label on the package for drug accountability purposes.

5.1.2 Storage and Handling

All study treatment must be kept in an appropriate, secure area to prevent unauthorized access. The study treatment is to be shipped under ambient conditions and stored in the original packaging at controlled room temperature (62 to 77°F; 17 to 25°C). Excursions between 59 to 86°F (15 to 30°C) will be permitted. Excessive humidity should be avoided. Storage conditions will be monitored and appropriate monitoring logs maintained as source data. Deviations from the established temperature, as well as the occurrence of excessive humidity, should be documented, and the Sponsor should be notified.

Study treatment should be handled and disposed of using proper procedures as defined by Investigational Site standard operating procedures (SOPs) for Investigational Drugs.

5.2 Randomization

This is a single center, randomized, double-blind, 3-way crossover study. Approximately 30 eligible subjects will be randomized to placebo and 2 of the 3 possible dose groups: ORMD-0801 460 IU qd (in the evening), ORMD-0801 460 IU bid (in the morning and evening) and ORMD-0801 460 IU tid (morning, afternoon, and evening).

In order to estimate the morning, afternoon, and evening PD effect, each subject will have one period in which the PD blood samples are drawn in the morning, one period in which the PD blood samples are drawn in the afternoon and one period in which the PD blood samples are drawn in the evening. When the subject is on active therapy, the PD blood samples will be drawn after an active therapy dose (not after the placebo dummy). Thus, if the subject is taking ORMD-0801 460 IU qd, the PD blood samples will be drawn in the evening. If the subject is taking ORMD-0801 460 IU bid, the PD blood samples will be drawn in the morning or evening. If the subject is taking ORMD-0801 460 IU tid or placebo, the PD blood samples will be drawn in the morning, afternoon, or evening.

Integrium, LLC will generate and implement the randomization procedures for this trial. A computer-generated randomization schedule will be used for assigning treatment (active or placebo). The Investigational Site pharmacist will follow this randomization schedule to dispense the appropriate study treatment.

5.3 Study Treatment Administration

5.3.1 Study Treatment Periods

In order to achieve the desired 460 IU, 2 capsules will be administered per dose. Accordingly, subjects who are randomized to placebo will also receive 2 identical placebo capsules per dose.

5.3.1.1 Single-Blind Placebo Administration

Placebo will be administered during Visit 2 on Days 1, 2, 3, and 9. On Day 1, subjects will receive one dose of placebo in the morning, followed by breakfast at least 45 minutes later. They will receive 4 additional doses of placebo to take one dose at least 45 minutes before lunch, one dose at bedtime, one dose at least 45 minutes before breakfast on Day 2, and one dose at least 45 minutes before lunch on Day 2. Subjects will be provided with an evening dose of placebo at approximately 10 pm (\pm 60 minutes) on Day 2. On Days 3 and 9, subjects will receive a dose of

single-blind placebo at approximately 7am (\pm 60 minutes), approximately 1pm (\pm 60 minutes), and before bed at approximately 10 pm (\pm 60 minutes).

5.3.1.2 Double-Blind Treatment Administration

Study treatment (active or placebo) will be administered during Visit 2 on Days 4-8. **Prior to administering the scheduled dose of study drug, the most recent available reading on the CGM monitor must indicate a blood glucose of ≥ 70 mg/dL.** On all days, subjects will receive a dose of study treatment or placebo at approximately 7am (\pm 60 minutes), approximately 1pm (\pm 60 minutes), and a dose before bed at approximately 10 pm (\pm 60 minutes).

Subjects may be randomized to receive ORMD-0801 qd, bid, or tid:

- Subjects receiving ORMD-0801 qd will receive their dose at approximately 10pm (\pm 60 minutes), while receiving identical placebo at approximately 7am (\pm 60 minutes) and at approximately 1pm (\pm 60 minutes).
- Subjects receiving ORMD-0801 bid will receive their doses at approximately 7am (\pm 30 minutes) and before bed at approximately 10pm (\pm 60 minutes), while receiving placebo at approximately 1pm (\pm 60 minutes).
- Subjects receiving ORMD-0801 tid will receive their doses at approximately 7am (\pm 60 minutes), at approximately 1pm (\pm 60 minutes), and before bed at approximately 10pm (\pm 60 minutes).

5.4 Dose Modifications

This study does not include any planned dose modifications. Subjects will be administered study treatment orally at the assigned (randomized) dose level unless discontinuation criteria as defined in Section 4.3 are met.

5.5 Measuring Subject Compliance

5.5.1 Study Treatment Periods 1 and 2

Four doses of placebo (8 capsules) will be dispensed to subjects for Day 1 and Day 2. Compliance will be reviewed during admission on Day 2 to protect the single-blind nature of this treatment.

All doses of study treatment will be administered in the CRU. Oral dosing compliance will be ascertained by inspection of the oral cavity (mouth check) following dosing.

5.6 Drug Accountability

In accordance with current GCP, the Investigational Site will account for all study treatment supplies. Details of receipt, storage, administration, and return or destruction will be recorded in the Investigational Drug accountability record according to the SOP of the Investigational Site. Copies of the Investigational Drug accountability record will be provided to the Sponsor.

Study treatment will only be dispensed to subjects enrolled in this protocol, and only as directed by this protocol. Administration of study treatment will be accurately recorded in each subject's source documents and CRF.

5.7 Concomitant Medications and Supplements

All medications and supplements (other than study treatment) taken by the subject from Visit 2/Day 1 through the Follow-up Visit 3 will be considered "concomitant" medications and supplements. Medications and supplements taken prior to Visit 2 that are no longer being taken at the time of Visit 2/Day 1 will be considered "prior" medications and supplements.

All prior medications and supplements taken within 30 days prior to the first dose of study treatment and concomitant medications and supplements will be recorded in the subject's source documentation and in the CRF.

The use of concomitant medications and supplements should be kept at a minimum, if possible. Any medications and supplements needed for the welfare of a subject and that in the judgment of the Investigator will not pose a significant risk to the subject for continued participation in the study or that will not interfere with the interpretation of the results of this study may be given to the subject. If a subject requires the use of any of the prohibited medications and supplements listed below, the Investigator will contact the Sponsor and the Medical Monitor to discuss the subject's continued participation in the study. In the event of an emergency, subjects will be treated at the discretion of the Investigator according to acceptable community standards of medical care.

The following are prohibited medications:

1. Any Investigational Drug other than ORMD-0801 (or placebo) within 30 days prior to Visit 2/Day 1 through the Follow-Up Visit 3;
2. Any anti-diabetic drugs (except for those allowable by the inclusion criteria) including insulin, GLP-1 analogue, α -glucosidase inhibitors, glinides, and pramlintide;
3. Aprotinin (e.g., Trasylol);
4. Thyroid preparations or thyroxine (except in subjects on stable replacement therapy);
5. Systemic long-acting corticosteroids or other systemic corticosteroids or inhaled corticosteroids (if daily dosage is $> 1,000 \mu\text{g}$ equivalent beclomethasone). Intra-articular and/or topical corticosteroids are not considered systemic.
6. Medications known to modify glucose metabolism or to decrease the ability to recover from hypoglycemia such as oral, parenteral, and inhaled steroids, and immunosuppressive or immunomodulating agents.

If the subject initiates prohibited drug therapy, or if the Investigator determines that use of a prohibited therapy is in the best interest of the patient's health and well-being, the Investigator and sponsor will jointly decide to continue or discontinue the subject.

5.8 Dietary Restrictions

Subjects will fast overnight for at least 8 hours prior to the clinical safety labs at Screening.

Subjects should not take any food for at least 45 minutes or more prior to scheduled ORMD-0801 (or placebo) dosing as described in the study design. All subjects will be provided with a standardized diabetic breakfast on Day 1, then continuing from dinner on Day 2 through breakfast on Day 10. Standardized snacks will be provided between breakfast and lunch, between lunch and dinner, and between dinner and bedtime.

Excessive caffeine use (i.e., more than five cups of caffeinated beverages per day) will not be allowed from Screening through the Follow-Up Visit 3. Excessive alcohol use or binge drinking will be discouraged during the study, and alcohol will be prohibited 72 hours prior to admission to the CRU (Visit 2/Period 1, 2, and 3/Day 1) and throughout the domiciled period (i.e., through the morning assessments on Day 10).

Subjects will also be asked to refrain from any unusual or unaccustomed vigorous exercise during the course of the study.

6 STUDY PROCEDURES AND ASSESSMENTS

6.1 Informed Consent

According to the ICH guideline for GCP (E6) and all institutional local, state, and federal laws, the Investigator will obtain and document informed consent for each subject screened for this study. All subjects will be informed in writing of the nature of the protocol and Investigational Drug, its possible hazards, and their right to withdraw at any time, and will sign a form (ICF) indicating their consent to participate in the study prior to the initiation of study procedures. The subject's medical record should contain written documentation indicating that informed consent was obtained. The ICF must be reviewed and approved by the Investigator's designated IRB and by Oramed Ltd. designee prior to its use. Refer to Section 11.1.4 for further details regarding informed consent.

6.2 Medical History and Prior Medications

At Screening, a complete medical history and social history, including smoking, caffeine, alcohol, and drug use, will be collected by subject interview. Medications and supplements, recent blood donations, illnesses, and participation in other Investigational Drug trials or clinical trials will also be recorded.

6.3 Safety Assessments

6.3.1 Weight and Height

Weight will be measured at all visits. Height will be measured at Screening only with the subject wearing no shoes.

6.3.2 Vital Signs

Vital signs (including seated SBP/DBP, and heart rate) will be recorded at all visits as described in Table 1. Temperature will be recorded at Visit 2/Day 2 only. Vital signs will be measured after the subject has been sitting for at least 5 minutes in a quiet environment and prior to any blood draw that occurs at the same time point. During Treatment Periods 1, 2, and 3, vital signs will be measured on Day 1, at admission on Day 2, immediately prior to morning dosing on Days 3-9, and on the morning of Day 10 prior to discharge. The recorded seated SBP/DBP value will be the mean of two measurements taken 2 minutes apart and always using the non-dominant arm.

6.3.3 Physical Examination

A physical examination will be performed at Screening and at Follow-Up Visit 3, or in case of Early Withdrawal. The physical examination will include the following organ or body system assessments: skin; head, eyes, ears, nose, and throat; thyroid; lungs; cardiovascular; abdomen (liver, spleen); lymph nodes; and extremities, as well as an abbreviated neurological examination.

6.3.4 12-Lead ECG

A 12-lead ECG will be performed at Screening. The 12-lead ECG will be recorded after the subject has been resting at least 5 minutes in the supine position in a quiet environment. ECGs

will be read for QT and QTc (Federicia's) intervals and clinically significant abnormalities. At the Investigator's discretion, an additional ECG may be performed at the end of treatment; however, it will be recorded in source documents as an unscheduled assessment.

6.3.5 Clinical Laboratory Tests

Blood and urine for clinical safety laboratory assessments will be collected and processed using standard procedures. A local laboratory will perform all clinical laboratory tests.

In the event of abnormal clinical laboratory values, the Investigator will make a judgment whether or not the abnormality is clinically significant.

6.3.5.1 Clinical Safety Labs

The clinical safety labs will include the following hematology, serum chemistry, and urinalysis tests:

Hematology

- Hematocrit
- Hemoglobin
- Mean corpuscular hemoglobin
- Mean corpuscular hemoglobin concentration
- Mean corpuscular volume
- Platelet count
- Red blood cell distribution width
- Red blood cell count
- White blood cell count with differential

Serum Chemistry

- Sodium
- Potassium
- Chloride
- Bicarbonate
- Alanine aminotransferase (ALT)
- Aspartate aminotransferase (AST)
- Gamma-glutamyltransferase (GGT)
- Total bilirubin
- Alkaline phosphatase
- Albumin
- Total Protein
- Blood urea nitrogen (BUN)
- Creatinine
- Uric acid
- Glucose
- Calcium
- Phosphorus
- Total cholesterol
- Triglycerides

Urinalysis

- Appearance (color and character)
- Bilirubin
- Urobilinogen
- Protein
- Glucose
- Ketones
- Leukocyte esterase
- Urine blood
- Nitrite
- pH
- Specific gravity

6.3.5.2 Pregnancy Test

A serum pregnancy test will be performed for WCBP at Screening. A urine pregnancy test will be performed for WCBP at treatment Periods 1, 2, and 3 (Day 2).

FSH testing to confirm menopause should be done for women who have had more than 24 months since their last menstrual cycle, who are younger than 55 years old, and who are not surgically menopausal.

6.3.5.3 Additional Screening Bloodwork

In addition to the blood tests listed above, HbA_{1c}, C-peptide, and thyroid stimulating hormone (TSH) will be measured at Screening.

6.3.5.1 Drugs of Abuse and Breathalyzer

Drugs of abuse urine screens will be completed at Screening and at Visit 2/Day 2 (all three treatment Periods) according to the laboratory manual provided by the local laboratory and will include testing for amphetamines, barbiturates, cocaine metabolites, opiates, benzodiazepines and cannabinoids. A breathalyzer test will also be performed at Screening and at Visit 2/Day 2 (all three treatment Periods).

6.4 Efficacy Assessments

6.4.1 Continuous Glucose Monitors (CGM)

A continuous glucose monitor (CGM) will be used to monitor patient glucose levels (including post-prandial) during Visit 2, Periods 1, 2, and 3. Further information about the device can be found in the laboratory manual.

Subjects will have the CGM implanted on Day 1 of each treatment Period. On Day 3, the cannula will be changed and the CGM will be re-implanted to collect data until the morning of Day 10. Staff will be advised regarding appropriate procedures in the event of nocturnal hypoglycemia.

6.5 Pharmacokinetic/Pharmacodynamic Assessments

Blood samples for PK/PD analysis of absorbed insulin based on C-peptide correction of total insulin levels will be collected during Visit 2, Periods 1, 2, and 3, on Day 3 and Day 8. An indwelling venous catheter may be inserted for the collection of blood samples if deemed necessary. One 4.5 mL sample of total whole blood will be collected for each blood draw.

On Day 3, blood samples will be collected at the following nominal time points relative to the scheduled (per randomization scheme) dose of placebo: predose (45 to 5 mins prior to dosing) and every 30 minutes (\pm 5 minutes) postdose until 5 hours has elapsed. On Day 8, blood samples will be collected at the following nominal time points relative to the scheduled (per randomization scheme) dose of study treatment (active or placebo): predose (45 to 5 mins prior to dosing) and every 30 minutes (\pm 5 minutes) postdose until 5 hours has elapsed. The total volume collected from each subject for PK/PD samples will be approximately 99 mL per treatment Period, for a total of 297 mL during the entire study. Actual blood sampling times must be recorded in the source and eCRF.

6.6 Review and Documentation of Medications and Supplements

All medications or supplements subjects are taking or have taken within 30 days prior to Visit 2/Day 1 through Follow-Up Visit 3 will be recorded in the subject's medical record and the CRF.

All medications and supplements (other than study treatment) taken by the subject after Visit 2/Day 1 through Follow-Up Visit 3 assessments will be considered "concomitant" medications and supplements. Medications and supplements taken prior to Visit 2/Day 1 that are no longer being taken at Visit 2/Day 1 will be considered "prior" medications and supplements.

Medications and supplements should be recorded according to the generic name when possible. The use of concomitant medications and supplements should be limited to those that are medically necessary. Any medication or supplement used should have an indication recorded, and for concomitant medications and supplements, this indication must be represented as either for the treatment of an AE, for the management of a pre-existing condition, or for prophylaxis.

Dosage increases for any concomitant medication or supplement should be noted and the reason for the dosage increase recorded as an AE (assumes worsening condition). The side effects of concomitant medications will be recorded as AEs.

Any subject whose condition becomes disqualifying during the course of the study may be treated for that condition. If the condition is suspected during Screening, the subject should not be enrolled. Treatment of the condition should be instituted according to the Investigator's/attending physician's judgment.

Medications that have no treatment intent but rather are part of supportive routine care such as local anesthetics, intravenous solutions to maintain fluid balance and keep access open, medications used for prophylaxis, and narcotics for postsurgical pain must also be recorded in the subject's medical record and CRF.

7 ADVERSE EVENTS AND SAFETY REPORTING

7.1 Safety and Tolerability Assessments

Safety and tolerability will be assessed on an ongoing basis by review of reported AEs, physical examinations, 12-lead ECGs, vital signs (including weight, seated SBP/DBP, heart rate, and temperature), and clinical safety labs (hematology, serum chemistry, and urinalysis).

7.2 Definition of Adverse Event

An AE is defined in 21 CFR 312.32(a) as follows:

Any untoward medical occurrence associated with the use of a drug in humans, whether or not considered drug related.

An AE (also referred to as an adverse experience) can be any unfavorable and unintended sign (e.g., an abnormal laboratory finding), symptom, or disease temporally associated with the use of a drug, and does not imply any judgment about causality. An AE can arise with any use of the drug (e.g., off-label use, use in combination with another drug) and with any route of administration, formulation, or dose, including an overdose.

AEs will be regarded as “pretreatment” if they occur during the placebo washout period or placebo run-in period. TEAEs are defined as any AE that starts or increases in severity after the first randomized dose of study treatment (active or placebo) on Day 4.

7.3 Definition of Serious Adverse Event

A SAE is defined in 21 CFR 312.32(a) as follows:

An AE is considered “serious” if, in the view of either the Investigator or Sponsor, it results in any of the following outcomes:

- Death;
- Life-threatening AE;
- Inpatient hospitalization or prolongation of existing hospitalization;
- Persistent or significant incapacity or substantial disruption of the ability to conduct normal life functions;
- Congenital anomaly/birth defect.

Important medical events that may not result in death, be life-threatening, or require hospitalization may be considered serious when, based upon appropriate medical judgment, they may jeopardize the patient or subject and may require medical or surgical intervention to prevent one of the outcomes listed in this definition. Examples of such medical events include allergic bronchospasm requiring intensive treatment in an emergency room or at home, blood dyscrasias or convulsions that do not result in inpatient hospitalization, or the development of drug dependency or drug abuse.

An AE is considered “life-threatening” if, in the view of either the Investigator or Sponsor, its occurrence places the patient or subject at immediate risk of death. It does not include an AE that, had it occurred in a more severe form, might have caused death.

7.3.1 Adverse Events of Hypoglycemia

The CTCAE (version 4.0) definition for mild, moderate, and severe hypoglycemia based on blood glucose will be used, as shown below:

Mild: from 55 to <70 mg/dL (3.0 to < 3.8 mmol/L)

Moderate: from 40 to < 55 mg/dL (2.2 to < 3.0 mmol/L)

Severe: from 30 to < 40 mg/dL (1.7 to < 2.2 mmol/L)

Life Threatening: < 30 mg/dL (< 1.7 mmol/L)

7.4 Eliciting and Reporting of Adverse Events

AE monitoring will start immediately following the first dose of washout period placebo and will continue through the Follow-Up Visit. Any subject with a possible study treatment-related AE at the Follow-Up Visit will be followed until resolution or stabilization of the event. Further, any SAE, whether or not related to study treatment, that occurs within 30 days following the last dose of study treatment will be followed until resolution or stabilization of the event. This may require additional clinical assessments and laboratory tests. The follow-up results will be recorded in the subject's source documentation and in the CRF.

Subjects will be instructed to report all AEs experienced during the study, and subjects will be assessed for the occurrence of AEs throughout the study. In order to avoid bias in eliciting AEs, subjects will be asked general, non-leading questions such as "How are you feeling?"

All AEs, including pretreatment and TEAEs, reported by the subject, observed or otherwise identified by the Investigator, or other Investigational Site personnel will be documented.

Medical conditions existing at Screening should be recorded as medical history. New or worsening pre-existing medical conditions or diseases are considered AEs if they arise or worsen after the Screening visit, and should be recorded as AEs.

Surgical procedures themselves are not AEs; they are therapeutic measures for conditions that require surgery. The condition for which the surgery is required is an AE if it occurs or is detected following the first dose of Study treatment through the Follow-Up Visit. Conditions leading to planned surgical procedures are not AEs if the condition(s) was (were) known before study treatment. In the latter case, the condition should be reported as medical history.

7.4.1 Routine Reporting of Adverse Events

All AEs, whether or not associated with the study treatment, that are observed by the Investigator, other Investigational Site personnel, or those reported by the subject will be recorded in the subject's source documentation and on the AE page of the CRF. Copies of the SAE CRF pages or an SAE listing generated based on the CRF pages will be submitted to the Sponsor at regularly scheduled intervals to allow the Sponsor to meet expedited regulatory reporting requirements under 21 CFR 312.32 (see Section 7.4.2 for further detail) and regular regulatory reporting requirements under 21 CFR 312.33.

For each AE, the following information will be entered in the CRF:

- Medical diagnosis of the event in standard medical terminology (if a medical diagnosis cannot be determined, a description of each sign or symptom characterizing the event);
- Date of onset of any new AE or worsening of a previously observed AE. For the days when the subject is housed in the CRU (Day 1-2), the time (based on a 24-hour clock) of onset should be recorded if available;
- Date of resolution of the event (or confirmation ongoing). For the days when the subject is housed in the CRU (Day 1-2), the time (based on a 24-hour clock) of resolution should be recorded if available;
- Whether the event is serious (per definition in Section 7.3), and if so, the reason it is considered serious;
- Severity of AE (per definition in Section 7.6);
- Assessment of the attributability of the AE to the study treatment [per definition in Section 7.5];
- Whether the event is expected (per definition in Section 7.7);
- Action taken in treating the AE (including concomitant medications or therapies administered) and/or change in the study treatment administration or dose (including whether the study treatment was temporarily interrupted or discontinued);
- Outcome of AE (per definition in Section 7.8).

7.4.2 Reporting of Serious Adverse Events, Including Death

The Sponsor will adhere to all expedited regulatory reporting requirements as per 21 CFR 312.32.

SAEs, including death due to any cause, which occur during this study or within 30 days following the last dose of the study treatment, whether or not related to the administration of study treatment, must be reported by the Investigator or other Investigational Site personnel to the Medical Monitor by telephone or fax **within 24 hours of learning of the event**. The contact information for the Medical Monitor is provided below.

Medical Monitor:

Carmen Margaritescu, MD
Safety Office, Integrium, LLC
Office: 714-210-6665
Cellular: 714-328-7083
Email: safety@integrium.com

SAE Forms will be provided by the Sponsor or Sponsor designated CRO. If all information is not known at the time of initial reporting, an initial report should still be made. In the event there is a question as to whether the experience is serious, the information should be forwarded to the Medical Monitor for review. The Investigator is responsible for following up on completion of the SAE Form. The Investigator will submit substantiating data in hard copy form, such as

diagnostic test reports and progress notes, to the Medical Monitor. In the case of fatality, autopsy reports will be furnished to the Medical Monitor as soon as available. If the Medical Monitor is informed of a SAE via a telephone call, preliminary information will be obtained, and the study site will be instructed to fax an SAE Form.

In the event of a medical emergency or an SAE that is unexpected (as defined in Section 7.7) and possibly related to the study treatment (s) (i.e., an adverse reaction or suspected adverse reaction as defined in Section 7.5), the blind will be broken for the subject that experiences the event. An emergency code break envelope for each subject will be provided to the Investigational Site and also to the Medical Monitor. In the event that the Investigational Site personnel need to unblind the study treatment and cannot access the relevant code break envelope at the site, they can contact the Medical Monitor.

The initial SAE Form and any subsequent follow-up SAE Forms submitted to provide more accurate, corrected, or new information must be signed by the Investigator. The Investigator and Investigational Site Personnel must make every reasonable effort to obtain, from other institutions if necessary, all supporting medical case records as needed to comply with expedited Investigational New Drug application (IND) safety reporting requirements.

If the SAE involves expedited IND safety reporting (as determined by the Sponsor or designee), all supporting medical records must be submitted to the Sponsor or designee within 4 calendar days for death or life-threatening events, and 10 calendar days for all other events. In cases where medical records and supporting documentation are unobtainable, the Investigator must generate a narrative of the event utilizing, when necessary, interviews with the subject, their family members and care givers as appropriate.

The Investigator must also promptly inform the governing IRB of the SAE in accordance with the governing IRB's requirements. Any SAE that is determined by the Sponsor to be reportable to the FDA as an IND Safety Report (as defined in 21 CFR 312.32) will be reported to FDA by the Sponsor or designee within the specified time frame. All IND Safety Reports will also be promptly provided to the Investigator for submission to his/her IRB. Similarly, any SAE that is determined by the Sponsor to require expedited reporting to other regulatory authorities will be reported to the appropriate authorities by the Sponsor or designee within the specified time frames, and will be provided to the Investigator for submission to his/her IRB.

The Investigator, Medical Monitor, and Sponsor will review each SAE report and evaluate the relationship of the adverse experience to study treatment and to underlying disease. Based on this assessment, a decision will be made concerning the need for further action. The primary consideration governing further action is whether new findings affect the safety of subjects participating in the clinical trial. If the discovery of a new adverse experience related to the study treatment raises concern over the safety of continued administration of study treatment, the Sponsor will take immediate steps to notify the regulatory authorities.

Further action that may be required includes the following:

1. Alteration of existing research by modification of the protocol;
2. Discontinuation or suspension of the study;
3. Alteration of the informed consent process by modification of the existing consent form and informing current study participants of new findings;

4. Modification of previously identified expected adverse experiences to include adverse experiences newly identified as study treatment-related.

If the subject or partner of a subject participating in the study becomes pregnant during the study or within 30 days of discontinuing study medication, the Investigator should report the pregnancy to Integrium within 24 hours of being notified. Safety personnel will then forward the Exposure In Utero form to the Investigator for completion.

The subject or partner should be followed by the Investigator until completion of the pregnancy. If the pregnancy ends for any reason before the anticipated date, the Investigator should notify the Sponsor. At the completion of the pregnancy, the Investigator will document the outcome of the pregnancy. If the outcome of the pregnancy meets the criteria for immediate classification as an SAE (i.e., postpartum complication, spontaneous abortion, stillbirth, neonatal death, or congenital anomaly), the Investigator should follow the procedures for reporting an SAE.

7.5 Causality Assessment of Adverse Events

For all AEs, the Principal Investigator will provide an assessment of causal relationship to the study treatment (active or placebo). The causality assessment must be recorded in the subject's source documents and on the AE CRF. Causal relationship will be classified according to the following criteria:

1. *Unrelated*: The event is clearly due to causes other than the active study drug.
2. *Unlikely*: The event is doubtfully related to active study drug. The event was most likely related to other factors such as the patient's clinical state, concomitant drugs or other therapeutic interventions.
3. *Possible*: The event follows a reasonable temporal sequence from the time of active study drug administration, but could have been produced by other factors such as the patient's clinical state, therapeutic interventions or concomitant drugs.
4. *Probable*: The event follows a reasonable temporal sequence from the time of active study drug administration, and follows a known response pattern to the drug. The toxicity cannot be reasonably explained by other factors such as the patient's clinical state, therapeutic interventions or concomitant drugs.
5. *Definite*: The event follows a reasonable temporal sequence from the time of active study drug administration, follows a known response pattern to the drug, cannot be reasonably explained by other factors such as the patient's condition, concomitant drugs or therapeutic interventions, AND either occurs immediately following active study drug administration, improves on stopping the study drug, or reappears on re-exposure.

7.5.1 Potential Adverse Events Associated with ORMD-0801

Hypoglycemia and associated symptoms (e.g., weakness, dizziness, shakiness, increased sweating, palpitations, or confusion), have been associated with insulin administration, including ORMD-0801. Animal reproductive studies have not been conducted with ORMD-0801. It is not known whether ORMD-0801 can cause fetal harm when administered to a pregnant woman. It is also not known whether this product is excreted in human milk. Pregnant or breastfeeding women are excluded from this study.

Long-term animal studies have not been completed to assess whether ORMD-0801 impairs fertility.

7.6 Adverse Event Severity Assessment

The severity of each AE will be graded according to the NCI CTCAE, version 4.03. The severity of AEs that are not specifically listed in the CTCAE will be categorized according to the general guidelines provided in the CTCAE, and as summarized in the table below.

General Guidelines for Severity Assessment of Adverse Events

Grade 1: Mild; asymptomatic or mild symptoms; clinical or diagnostic observations only; intervention not indicated.
Grade 2: Moderate; minimal, local or noninvasive intervention indicated; limiting age-appropriate instrumental activities of daily living (ADL) [preparing meals, shopping for groceries or clothes, using the telephone, managing money, etc.].
Grade 3: Severe or medically significant but not immediately life-threatening; hospitalization or prolongation of hospitalization indicated; disabling; limiting self-care ADL (bathing, dressing and undressing, feeding self, using the toilet, taking medications, and not bedridden).
Grade 4: Life-threatening consequences; urgent intervention indicated.
Grade 5: Death related to AE.

Note the distinction between the severity and the seriousness of an AE. A severe AE is not necessarily a SAE. For example, a headache may be severe (interferes significantly with patient's usual function) but would not be classified as serious unless it met one of the criteria for SAEs, listed above in Section 7.3.

7.7 Expectedness of Adverse Event

An unexpected AE is defined in 21 CFR 312.32(a) as follows:

An AE is considered “unexpected” if it is not listed in the IB or is not listed at the specificity or severity that has been observed; or, if an IB is not required or available, is not consistent with the risk information described in the general investigational plan or elsewhere in the current application, as amended.

7.8 Assessment of Adverse Event Outcome

Outcome of AEs will be defined according to ICH Topic E2B, ICH Guideline.

- **Recovered/Resolved:** The subject has recovered fully from the AE without any remaining effects or impairment.
- **Recovered/Resolved with Sequelae:** The subject has recovered, but with an after effect possibly due to disease or treatment.
- **Not Recovered/Not Resolved:** The condition is still present.

- **Fatal:** Fatal should only be used when death is possibly related to the AE.
- **Unknown:** The primary outcome is not known at the time of the final assessment. If an outcome for an AE is not available at the time of the initial report, follow-up will proceed until an outcome is known or followed up to the Final Study Visit. Any subject with a possible study treatment-related AE at the Final Study Visit will be followed until resolution or stabilization of the event. Further, any SAE, whether or not related to Study treatment (active or placebo), that occurs within 30 days following the last dose of Study treatment will be followed until resolution or stabilization of the event.

7.9 Clinical Findings

Any significant clinical findings at the Follow-Up Visit will be followed until the condition returns to pre-study status, stabilizes, or can be explained as not being study treatment related. If the clinical finding is reported as an AE (per the criteria outlined in Section 10.2), the follow-up procedures for AEs defined above will apply.

8 STATISTICAL METHODS

This section describes the statistical methods to be used for the analysis and reporting of data collected under Protocol No. ORA-D-012. Additional details will be provided in the statistical analysis plan.

8.1 Sample Size

A total of 30 subjects will be randomized to receive either placebo, ORMD-0801 460 IU qd, ORMD-0801 460 IU bid, or ORMD-0801 460 IU tid during each treatment period.

Safety will be a secondary endpoint for this trial and will be assessed primarily based on AEs. Secondary safety assessments will include physical examination, 12-lead ECG, vital signs (including weight, seated SBP/DBP, heart rate, and temperature), and clinical safety labs (hematology, serum chemistry, and urinalysis).

This study is not powered for statistical significance.

8.2 Pharmacokinetic/Pharmacodynamic Evaluation

The PK/PD analysis will be conducted using model-independent methods and will be based on plasma concentrations of insulin and C-peptide.

Individual plasma concentrations of insulin and C-peptide will be listed for each subject and sampling time and summarized descriptively using the arithmetic mean, SD, CV (%), median, minimum and maximum. Individual plasma concentration-time profiles of insulin and C-peptide will be plotted on both a linear and a semi-logarithmic scale. Mean values will also be presented graphically.

8.3 Continuous Glucose Monitor Evaluation

For the purpose of analysis:

- 24-hour will be considered to be from 6AM to 6AM,
- Daytime will be considered to be from 6AM to 10PM, and
- Nighttime will be considered to be from 10PM to 6AM.

The last 2 days with at least 80% of expected measurements prior to dosing will be considered the run-in days for each of the parameters. The last 2 days with at least 80% of expected measurements prior to 8 hours after the last dose will be considered the on treatment days. The measurements more than 8 hours after the last dose will be considered the follow-up days.

The area under the curve (AUC) will be derived for each of the time periods (24-hour, daytime and nighttime) using the indicated days (run-in days, treatment days and follow-up days). The average glucose measurement will be derived by dividing the AUC by the number of observed hours. The average change from run-in will be derived for each treatment regimen for both the treatment days and the follow-up days.

The placebo adjusted change in means will be derived for each of the active therapy regimens by subtracting the placebo mean (the mean change from run-in while the subject was receiving placebo) from the active therapy mean (the mean change from run-in while the subject was receiving the active therapy). The placebo adjusted change in means will be derived for both the treatment days and the follow-up days.

The placebo adjusted change in means will be analyzed using an Analysis of Variance (ANOVA) with treatment as the main effect to determine whether multiple doses a day has an effect on the CGM parameters.

The ratios of the placebo adjusted change in means between the active treatments within each subject will also be derived to estimate the magnitude of the dose response.

Summary statistics will be presented for both the placebo adjusted change in means and the ratios of the placebo adjusted change in means. Analysis results will be presented for the change in means.

8.4 Safety Evaluation

8.4.1 Safety Population

All randomized subjects who receive at least one dose of study treatment will be included in the safety analysis population.

8.4.2 Adverse Events

AEs will be coded using the most current version of MedDRA. The severity of AEs will be graded according to NCI CTCAE version 4.03. AEs will be regarded as “pretreatment” if they occur during the placebo washout period or placebo run-in period. TEAEs are defined as any AE that starts or increases in severity after the first randomized dose of study treatment on Visit 2/Day 4.

The incidence of TEAEs will be tabulated by MedDRA preferred term, system organ class, treatment group, severity, and assigned relationship to study treatment. The incidence for each TEAE will be provided as the total number of subjects that experienced the TEAE, as well as the percentage of the population that this represents. If a TEAE is reported more than once for a

given subject, the greatest severity and the worst-case attribution will be presented in the summary tables.

TEAEs will be listed for individual subjects, along with information regarding onset and end dates, onset time where available, severity, seriousness, relationship to study treatment, action taken, and outcome. A similar listing will be prepared for the pretreatment AEs.

Pretreatment AEs and TEAEs that lead to withdrawal from the study will be separately listed and summarized. Similarly, separate tabulations and listings will be prepared for pretreatment and treatment-emergent SAEs.

Descriptive statistics will be generated as appropriate (i.e., frequency for categorical data). Inferential statistical analysis comparing the AE data between active and placebo is not planned.

8.4.3 Laboratory Evaluations

Individual clinical safety lab (hematology, serum chemistry, and urinalysis) values will be listed by visit and summarized using descriptive statistics as appropriate (i.e., mean, median, range, and standard deviation for continuous data and frequency for categorical data). Individual change from baseline (Screening) in laboratory values will be calculated and summarized descriptively. Shift tables from baseline (Visit 2/Day 1) to postdose (Visit 3) will also be produced for the laboratory assessments based on the categories of Low, Normal, and High. A clinically significant change from baseline (Screening) will be recorded as an AE if deemed appropriate by the Investigator.

8.4.4 Vital Signs

Individual vital sign measurements (height, weight, seated SBP/DBP, heart rate, and temperature) will be listed by measurement time and summarized using descriptive statistics as appropriate (i.e., mean, median, range, and standard deviation). Individual change from baseline (predose Day 1) in vital sign measurements will be calculated and summarized descriptively. A clinically significant change from baseline (predose Day 1) will be recorded as a TEAE if deemed appropriate by the Investigator.

8.4.5 12-lead ECG

Individual 12-lead ECG assessments will be listed by visit and summarized using descriptive statistics as appropriate (i.e., mean, median, range, and standard deviation for continuous data and frequency for categorical data).

8.4.6 Physical Examination

Individual physical examination findings will be listed by visit. A clinically significant change from baseline (Screening) will be recorded as an AE if deemed appropriate by the Investigator.

8.4.7 Prior and Concomitant Medications and Supplements

Medications and supplements will be coded using the most current version of the WHO Drug Reference List, which employs the Anatomical Therapeutic Chemical classification system.

All medications and supplements (other than study treatment) taken by the subject from Visit 2/Day 1 through the Visit 3 will be considered “concomitant” medications and supplements.

Medications and supplements taken prior to Visit 2/Day 1 that are no longer being taken at the time of Visit 2/Day 1 will be considered “prior” medications and supplements.

Concomitant medications and supplements will be listed for individual subjects. A similar listing will be prepared for prior medications and supplements taken within 30 days prior to the first dose of study treatment. The incidence of these prior and concomitant medications and supplements will be summarized.

8.4.8 Handling of Missing, Unused, or Spurious Data

Descriptive statistics and listings will be provided for all data. No substitution of missing data will be used in any calculations. Data points that appear to be spurious will be investigated and will not be excluded from the listings. Influential cases will be handled in an appropriate statistical manner.

9 DATA MANAGEMENT

9.1 Data Collection

All data required by the study protocol will be collected in a validated database according to the contract research organization's (CRO's) SOPs.

9.2 Electronic Data Capture

Data from the source documents will be entered into the electronic data capture (EDC) system by authorized Investigational Site personnel. Data Management staff, using both electronic and manual checks, will systematically check the data. Errors or omissions will result in queries (which can be issued by the Study Monitor or Data Management staff), which will be presented to the Investigational Site within the EDC system. The Investigational Site will resolve the queries within the EDC system. The Study Monitor and Data Management staff will review the responses as part of the query resolution process. The EDC system will track the queries with the corresponding responses.

Medications and supplements entered into the database will be coded in the EDC system using the World Health Organization (WHO) Drug Reference List, which employs the Anatomical Therapeutic Chemical classification system. AEs and Medical History will be coded in the EDC system using MedDRA terminology.

Clinical laboratory samples will be processed by CMB and the PK/PD samples will be processed by New Rambam Laboratories 1997 Ltd, 16 Hillel St., Israel and the results will be sent electronically to Integrium. The clinical laboratory results will be imported into the database.

9.3 Quality Assurance and Database Lock

A 100% critical variable review of all key safety and secondary endpoint data in the database will be performed. Following this review, a data quality control audit or a random sample equal to the square root plus 1 of the total population will be performed.

When the database has been declared to be complete and accurate, the database will be locked. Any changes to the database after that time can only be made by joint written agreement between the Sponsor, the Investigator, Integrium, and the study biostatistician.

10 AMENDMENTS/MODIFICATIONS OF THIS PROTOCOL

The Investigator will ensure that the study is conducted in accordance with the procedures and evaluations described in this protocol. As the study progresses it may become necessary to change or modify parts of the protocol. The Sponsor or designee is responsible for submitting protocol amendments to the appropriate government regulatory authorities. The Investigator is responsible for submitting protocol amendments to the appropriate IRB. Approval by the IRB must be obtained before changes are implemented.

When an emergency occurs that requires a departure from the protocol for an individual, a departure will be only for that subject. The Investigator or other physician in attendance in such

an emergency will, if circumstances and time permit, contact the Medical Monitor immediately by telephone. Such contacts will be made as soon as possible to permit a decision as to whether or not the subject (for whom the departure from protocol was affected) is to continue in the study. The CRF and source documents will completely describe the departure from the protocol and state the reasons for such departure. In addition, the IRB will be notified in writing of such departure from protocol.

11 INVESTIGATOR OBLIGATIONS

11.1 Regulatory Documentation

Before the trial starts, Essential Documents as defined in ICH E6 will be generated and placed in both the Investigator's and Sponsor's files. Additional Essential Documents will be added to both files as new information becomes available and at the completion or termination of the trial as defined in ICH E6.

11.1 Protection of Human Subjects

11.1.1 Declaration of Helsinki

The Investigator will conduct this study in accordance with the Declaration of Helsinki (1964) including all amendments up to and including the October 2013 revision.

11.1.2 Good Clinical Practice and Regulatory Compliance

The Investigator will conduct this study in accordance with the principles of GCP (current ICH guidelines) and the requirements of all local regulatory authorities regarding the conduct of clinical trials and the protection of human subjects.

The study will be conducted as described in the approved protocol, with amendments and in accordance with the obligations of clinical Investigators set forth in the Form FDA 1572 and in 21 CFR 50, 54, 56 and 312.

11.1.3 Institutional Review Board

The Investigator is responsible for the submission of the protocol, ICF, and other written materials (such as advertisements and diaries), along with relevant supporting data (e.g., IB), to the appropriate IRB for review and approval before the study can be initiated. The Investigator is also responsible for submitting amendments to the protocol and ICF to the IRB for review and approval prior to implementation of the change. The Investigator is responsible for providing the Sponsor with a letter documenting the IRB approval prior to initiation of the study or implementation of the changes, respectively.

The Investigator will not have authority to implement any deviation or change to the protocol without prior review and documented approval/favorable opinion from the IRB of an amendment, except where necessary to eliminate an immediate hazard to study subjects. Any significant deviation from the approved protocol will be documented in the source documents and case report form (CRF).

Any deviation or change to the protocol required to eliminate an immediate hazard prior to obtaining IRB approval/favorable opinion, will be submitted as soon as possible to:

- IRB for review and approval/favorable opinion.
- The Sponsor via appropriate designees.
- Regulatory Authorities, if required by local regulations.

Documentation of IRB approval signed by the chairperson or designee of the IRB will be provided to the Sponsor via appropriate designees.

If an Amendment substantially alters the study design or increases the potential risk to the subject: (1) the ICF will be revised and submitted to the IRB for review and approval/favorable opinion; (2) the revised ICF will be used to obtain consent from subjects currently enrolled in the study if they are affected by the Amendment; and (3) the new ICF will be used to obtain consent from any new subjects prior to enrollment.

The Investigator is responsible for informing the IRB of all reportable AEs. IND Safety Reports provided by the Sponsor to the Investigator will be promptly forwarded to the IRB by the Investigator. Updates to the IB provided by the Sponsor to the Investigator will be submitted to the IRB by the Investigator.

The Investigator is also responsible for informing the IRB of the progress of the study and for obtaining annual IRB renewal. The Investigator must inform the IRB when the study is completed or terminated. After completion or termination of the study, the Investigator will submit the final clinical study report to the IRB. The structure and content of the report will meet that described in Structure and Content of Clinical Study Reports E3 (ICH Harmonized Tripartite Guideline, dated November 30, 1995).

11.1.4 Subject Informed Consent

The Investigator must comply with informed consent regulations (21 CFR Part 50) and relevant state regulations (i.e., California Bill of Rights for California patients).

The ICF will clearly describe the nature, scope, and potential risks and benefits of the study, in a language that the subject understands. The ICF will conform to all the requirements for informed consent according to ICH GCP and US FDA guidelines (21 CFR 50) and will include any additional elements required by the Investigator's institution or local regulatory authorities. The ICF will adhere to the ethical principles that have their origin in the Declaration of Helsinki.

Prior to the beginning of the study, the Investigator will obtain the IRB's written approval/favorable opinion of the written ICF. The IRB approved ICF will be given to each prospective participant. The subjects will be given adequate time to discuss the study with the Investigator or site staff and to decide whether or not to participate. Each subject who agrees to participate in the trial and who signs the ICF will be given a copy of the signed, dated, and witnessed document. The original signed ICF will be retained by the Investigator in the study files.

The ICF and any other information provided to subjects will be revised whenever important new information becomes available that is relevant to the subject's consent, and the Investigator will obtain the IRB's written approval/favorable opinion prior to the use of the revised documents. The Investigator, or a person designated by the Investigator, will fully inform the subject of all pertinent aspects of the study and of any new information relevant to the subject's willingness to continue participation in the study. Subjects will read and sign any and all revised ICFs.

11.2 Subject Confidentiality

All information obtained during the conduct of the study with respect to the subjects' state of health will be regarded as confidential. This is detailed in the ICF provided to the subject. An agreement for the use or disclosure of any such information (PHI) will be obtained from the subject in writing (HIPAA authorization) prior to performing any study-related procedures. Disclosure of subject medical information obtained as a result of this study to third parties other than those noted below is prohibited.

Medical information resulting from a subject's participation in this study may be given to the subject's personal physician or to the appropriate medical personnel responsible for the subject's welfare. Data generated as a result of this study are to be available for inspection on request by FDA or other government regulatory agency auditors, the Sponsor (or designee), and the IRB.

The information developed in this clinical study will be used by the Sponsor in the clinical development of the Study treatment and therefore may be disclosed by the Sponsor as required for disclosure as a public company to other clinical investigators, to other pharmaceutical companies, to the FDA, and to other government agencies. All reports and communications relating to subjects in this study will identify each subject only by their initials and subject number.

11.3 Case Report Forms

All data required by the study protocol will be recorded in the CRF provided by the EDC vendor. Data from the source documents will be entered into the EDC system by authorized Investigational Site personnel. The CRF will be updated at the time of each subject visit. Results of tests performed outside the Investigational Site will be entered as soon as available to the Investigational Site. The Principal Investigator must verify that all data entries in the CRF are accurate and correct by signing the subject's CRF investigator signature screen.

11.4 Source Documentation

All data entered in the CRF must be verifiable against source documentation. Source documents may include, but are not limited to, a subject's medical record, hospital charts, clinic charts, the Principal Investigator's study files, as well as the results of diagnostic tests.

11.5 Retention of Records

The Investigator has the responsibility of maintaining a comprehensive and centralized filing system containing all study-related documentation. These files must be available for inspection by the Sponsor or designee, the IRB, and regulatory authorities (i.e., FDA or international regulatory authorities) at any time and should consist of the Essential Documents as defined in ICH E6, which include, but are not limited to, the following elements:

- Subject files, containing the completed CRFs, supporting source documentation from the medical record, including laboratory data, and the signed ICF;
- Regulatory files, containing the protocol with all amendments and Sponsor and Investigator signature pages, copies of all other regulatory documentation, and all correspondence between the site and the IRB and Sponsor; and

- Drug accountability files, including a complete account of the receipt and disposition of the Study treatment (active and placebo).

The Investigator will retain all study records for at least 2 years after the last approval of a marketing application in an ICH region (i.e., United States, Europe, or Japan), and until there are no pending or contemplated marketing applications in an ICH region. If no application is filed or if the application is not approved for such indication, the Investigator will retain all study records for at least 2 years after the investigation is discontinued and regulatory authorities have been notified. The Sponsor will provide written notification when it is appropriate for the Investigator to discard the study-specific documents referenced above.

The Investigator will notify the Sponsor prior to destroying any study records. Should the Investigator wish to assign the study records to another party or move them to another location, the Sponsor will be notified in writing in advance.

If the Investigator cannot guarantee this archiving requirement at the Investigational Site for any or all of the documents, special arrangements will be made between the Investigator and the Sponsor for storage. If source documents are required for continued care of the subject, appropriate copies for storage off site will be made.

11.6 Clinical Study Report

After completion or termination of the study, a clinical study report will be prepared. The structure and content of the report will meet that described in Structure and Content of Clinical Study Reports E3 (ICH Harmonized Tripartite Guideline, dated November 30, 1995). The Principal Investigator must verify that all information and data in the clinical study report is accurate and correct by signing the clinical study report.

12 STUDY ADMINISTRATION

12.1 Study Monitoring

This study will be monitored by the Sponsor or designee to evaluate the progress of the study, to verify the accuracy and completeness of the CRFs, to assure that all protocol requirements, applicable laws and/or regulations, and Investigator's obligations are being fulfilled, and to resolve any inconsistencies in the study records.

The Investigator will allow the Study Monitor to periodically review, at mutually convenient times during the study and after the study has been completed, all CRFs and office, hospital, and laboratory records supporting the participation of each subject in the study.

The Study Monitor will compare the CRF data against source documentation in order to verify its accuracy and completeness. The Investigator and Investigational Site staff will collaborate with the Study Monitor to resolve any identified data discrepancies in a timely manner.

The Study Monitor will record any protocol deviations identified, including, but not limited to, subjects that were enrolled even though they did not meet all eligibility criteria, subjects who took concomitant medications specifically prohibited by the protocol, subjects who received the wrong study treatment or incorrect dose, and subjects who failed to comply with the protocol-

defined dietary restrictions. The Investigator and Investigational Site staff will collaborate with the Study Monitor to identify the reason for each protocol deviation.

The Study Monitor will compare the Investigational Site study treatment accountability record against the study treatment inventory (unused and used) at the site. The Investigator and Investigational Site staff will collaborate with the Study Monitor to resolve any identified discrepancies in a timely manner.

Each issue identified during study monitoring visits will be documented and reported to both the Sponsor and the Investigator.

12.2 On-Site Audits

The FDA, or other regulatory authorities, may request access to all study records for inspection and copying. The Principal Investigator and Investigational Site staff will cooperate with the inspectors and allow access to all source documents supporting the CRFs and other study-related documents. The Investigator will immediately notify the Sponsor when contacted by any regulatory authority for the purpose of conducting an inspection.

The Sponsor or designee may also request to visit the Investigator's site to conduct an audit of the study. Prior to initiating this audit, the Investigator will be contacted by the Sponsor to arrange a convenient time for this visit. The Principal Investigator and Investigational Site staff will cooperate with the auditors and allow access to all source documents supporting the CRFs and other study-related documents.

12.3 Data Quality Assurance

All CRFs must be completed by authorized Investigational Site personnel who have undergone electronic CRF training. Data will be entered into the CRF as information becomes available on a visit-by-visit basis. All data recorded on the CRFs must be supported by source documentation. The Principal Investigator must verify that all data entries in the CRF are accurate and correct by electronically signing and dating the CRF.

All CRF corrections must be made by the Principal Investigator or authorized Investigational Site personnel. The Principal Investigator must authorize changes to the recorded data, and this authorization must be documented in the source documents.

Refer to Section 8 for further details regarding Data Management quality assurance, including query generation and resolution, final data review, and database lock.

12.4 Publication Policy

All information and data obtained in the course of the study are the property of the Sponsor and are considered confidential. To avoid disclosures that could jeopardize proprietary rights, the institution and/or the Investigator agree to certain restrictions on publications (e.g., abstracts, speeches, posters, manuscripts, and electronic communications), as detailed in the clinical trial agreement.

The publication or presentation of any study results shall comply with all applicable privacy laws, including, but not limited to, HIPAA or equivalent.

This trial will be registered in a publicly accessible database (clinicaltrials.gov) not later than 21 days after enrollment of the first subject. Results of this trial, including negative and inconclusive, as well as positive results, will be made publicly available.

12.5 Disclosure and Confidentiality

By signing the protocol, the Investigator agrees to keep all information provided by the Sponsor and Integrium in strict confidence and to request similar confidentiality from his/her staff and the IRB. Study documents provided by the Sponsor and Integrium (protocols, IBs, CRFs, and other material) will be stored appropriately to ensure their confidentiality. The information provided by the Sponsor and Integrium to the Investigator may not be disclosed to others without direct written authorization from the Sponsor and Integrium, except to the extent necessary to obtain informed consent from subjects who wish to participate in the study.

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