

Process for Security Holder Communications with Directors

1. Agenus Inc. (the “Company”) believes it is valuable for its security holders to have a line of communication to the Board of Directors.
2. The Lead Director has been designated by the Board of Directors as the person to receive such security holder communications (as such term is used in the rules and regulations of the Securities and Exchange Commission).
3. Stockholders should send communications to

Agenus Inc.
3 Forbes Road
Lexington, MA 02421
Attention: Lead Director
4. Correspondence from stockholders initially will be reviewed by an in-house attorney or other member of management. After removing materials of a commercial nature, this individual then will forward either a summary of the correspondence or a copy of the correspondence to the Lead Director. The process for collecting and organizing security holder communications will be approved by the independent members of the Board of Directors.
5. At regular meetings of the Board of Directors, the Lead Directors will review with the entire Board of Directors significant correspondence received from security holders.

Adopted March 11, 2004