Our STN: BL 125743/55

SUPPLEMENT APPROVAL
December 2, 2025

GC Biopharma Corp.
Attention: Tracy TreDenick
c/o Dark Horse Consulting Group, Inc.
1255 Treat Blvd, Suite 230
Walnut Creek, CA 94597

Dear Tracy TreDenick:

We have approved your request received June 3, 2025, to supplement your Biologics License Application (BLA) submitted under section 351(a) of the Public Health Service Act for immune globulin intravenous, human-stwk to change lot release specifications of Immunoglobulin A (IgA) for (b) (4) Drug Product from ≤ 100 µg/mL to ≤ 20 µg/mL and to add information regarding osmolality and additives in Prescribing Information.

LABELING

We hereby approve the draft content of labeling Package Insert submitted June 3, 2025, and the draft carton and container labels submitted June 3, 2025.

CONTENT OF LABELING

As soon as possible, but no later than 14 days from the date of this letter, please submit the final content of labeling (21 CFR 601.14) in Structured Product Labeling (SPL) format via the FDA automated drug registration and listing system, (eLIST) as described at https://www.fda.gov/industry/fda-data-standards-advisory-board/structured-product-labeling-resources. Content of labeling must be identical to the Package Insert submitted on June 3, 2025. Information on submitting SPL files using eLIST may be found in the guidance for industry *SPL Standard for Content of Labeling Technical Qs and As* at https://www.fda.gov/regulatory-information/search-fda-guidance-documents/spl-standard-content-labeling-technical-qs.

The SPL will be accessible via publicly available labeling repositories.

CARTON AND CONTAINER LABELS

Please electronically submit final printed carton and container labels identical to the carton and container labels submitted on June 3, 2025, according to the guidance for industry *Providing Regulatory Submissions in Electronic Format — Certain Human*

Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications at https://www.fda.gov/regulatory-information/search-fda-guidance-documents/providing-regulatory-submissions-electronic-format-certain-human-pharmaceutical-product-applications.

All final labeling should be submitted as Product Correspondence to this BLA, STN BL 125743 at the time of use and include implementation information on Form FDA 356h.

ADVERTISING AND PROMOTIONAL LABELING

You may submit two draft copies of the proposed introductory advertising and promotional labeling with Form FDA 2253 to the Advertising and Promotional Labeling Branch at the following address:

Food and Drug Administration
Center for Biologics Evaluation and Research
Document Control Center
10903 New Hampshire Ave.
WO71–G112
Silver Spring, MD 20993-0002

You must submit copies of your final advertising and promotional labeling at the time of initial dissemination or publication, accompanied by Form FDA 2253 (21 CFR 601.12(f)(4)).

All promotional claims must be consistent with and not contrary to approved labeling. You should not make a comparative promotional claim or claim of superiority over other products unless you have substantial evidence or substantial clinical experience to support such claims (21 CFR 202.1(e)(6)).

For each pending supplemental application for this BLA that includes proposed revised labeling, please submit an amendment to update the proposed revised labeling with the changes approved today.

We will include information contained in the above-referenced supplement in your BLA file.

Sincerely,

Dorothy Scott, MD
Director
Division of Plasma Derivatives
Office of Plasma Protein Therapeutics
Office of Therapeutic Products
Center for Biologics Evaluation and Research