



BLA 208583/S-026

SUPPLEMENT APPROVAL

Novo Nordisk Inc.
Attention: Briana Norris
Associate Manager, Regulatory Affairs
P.O. Box 846
800 Scudders Mill Road
Plainsboro, NJ 08536

Dear Briana Norris:

Please refer to your supplemental biologics license application (sBLA) received April 14, 2025, and your amendments, submitted under section 351(a) of the Public Health Service Act for Xultophy 100/3.6 (insulin degludec and liraglutide) injection.

This Prior Approval supplemental biologics application provides for the following revisions to the Prescribing Information (PI):

- Revise Warnings and Precautions Section 5.2 Acute Pancreatitis for consistency with the class.
- Revise Warnings and Precautions Section 5.8 Severe Gastrointestinal Adverse Reactions to include the statement “Severe gastrointestinal adverse reactions have also been reported postmarketing with GLP-1 receptor agonists.”
- Add ‘intestinal obstruction, severe constipation including fecal impaction’ in Section 6.2, Postmarketing Experience.

APPROVAL & LABELING

We have completed our review of this application, as amended. It is approved, effective on the date of this letter, for use as recommended in the enclosed agreed-upon labeling with minor editorial revisions listed below and reflected in the enclosed labeling.

- Updated date and removed unnecessary addition to Recent Major Changes
- Revised the Limitations of Use in the Highlights to align with the Full PI
- Added ‘nausea’ under Acute Pancreatitis in Section 17 Patient Counseling Information

CONTENT OF LABELING

As soon as possible, but no later than 14 days from the date of this letter, submit, via the FDA automated drug registration and listing system (eLIST), the content of labeling [21 CFR 601.14(b)] in structured product labeling (SPL) format, as described at FDA.gov,¹ that is identical to the enclosed labeling (text for the PI, Instructions for Use, and Medication Guide) and include the labeling changes proposed in any pending “Changes Being Effected” (CBE) supplements.

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*.²

The SPL will be accessible via publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications that include labeling changes for this BLA, including pending “Changes Being Effected” (CBE) supplements, for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 601.12(f)] in Microsoft Word format that includes the changes approved in this supplemental application, as well as annual reportable changes. To facilitate review of your submission(s), provide a highlighted or marked-up copy that shows all changes, as well as a clean Microsoft Word version. The marked-up copy should provide appropriate annotations, including supplement number(s) and annual report date(s).

REQUIRED PEDIATRIC ASSESSMENTS

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients (which includes new salts and new fixed combinations), new indications, new dosage forms, new dosing regimens, or new routes of administration are required to contain an assessment of the safety and effectiveness of the product for the claimed indication in pediatric patients unless this requirement is waived, deferred, or inapplicable.

Because none of these criteria apply to your supplemental application, you are exempt from this requirement.

PROMOTIONAL MATERIALS

You may request advisory comments on proposed introductory advertising and promotional labeling. For information about submitting promotional materials, see the final guidance for industry *Providing Regulatory Submissions in Electronic and Non-*

¹ <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>

² We update guidances periodically. For the most recent version of a guidance, check the FDA Guidance Documents Database <https://www.fda.gov/RegulatoryInformation/Guidances/default.htm>.

*Electronic Format-Promotional Labeling and Advertising Materials for Human Prescription Drugs.*³

You must submit final promotional materials and Prescribing Information, accompanied by a Form FDA 2253, at the time of initial dissemination or publication [21 CFR 601.12(f)(4)]. Form FDA 2253 is available at FDA.gov.⁴ Information and Instructions for completing the form can be found at FDA.gov.⁵

All promotional materials that include representations about your drug product must be promptly revised to be consistent with the labeling changes approved in this supplement, including any new safety-related information [21 CFR 601.12(f)(4)]. The revisions in your promotional materials should include prominent disclosure of the important new safety-related information that appears in the revised labeling. Within 7 days of receipt of this letter, submit your statement of intent to comply with 21 CFR 601.12(f)(4).

REPORTING REQUIREMENTS

We remind you that you must comply with reporting requirements for an approved BLA (in 21 CFR 600.80 and in 21 CFR 600.81).

Your product is a Part 3 combination product (21 CFR 3.2(e)); therefore, you must also comply with postmarketing safety reporting requirements for an approved combination product (21 CFR 4, Subpart B). Additional information on combination product postmarketing safety reporting is available at FDA.gov.

If you have any questions, contact Marisa Petruccelli, Safety Regulatory Project Manager, at (240) 402-6147.

Sincerely,

{See appended electronic signature page}

Monika Houstoun, Pharm.D., M.P.H.
Deputy Director for Safety
Division of Diabetes, Lipid Disorders, and Obesity
Office of Cardiology, Hematology, Endocrinology,
and Nephrology
Office of New Drugs
Center for Drug Evaluation and Research

³ For the most recent version of a guidance, check the FDA guidance web page at <https://www.fda.gov/media/128163/download>.

⁴ <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf>

⁵ <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf>

ENCLOSURES:

- Content of Labeling
 - Prescribing Information
 - Medication Guide (version previously approved on May 28, 2025)
 - Instructions for Use (version previously approved on June 10, 2022)

This is a representation of an electronic record that was signed electronically. Following this are manifestations of any and all electronic signatures for this electronic record.

/s/

MONIKA A HOUSTOUN
10/14/2025 12:54:16 PM