

Investment Objective and Benchmark Index

The Biotech Growth Trust PLC (the "Company") seeks capital appreciation through investment in the worldwide biotechnology industry. Performance is measured against its benchmark index, the NASDAQ Biotechnology Index (sterling adjusted).



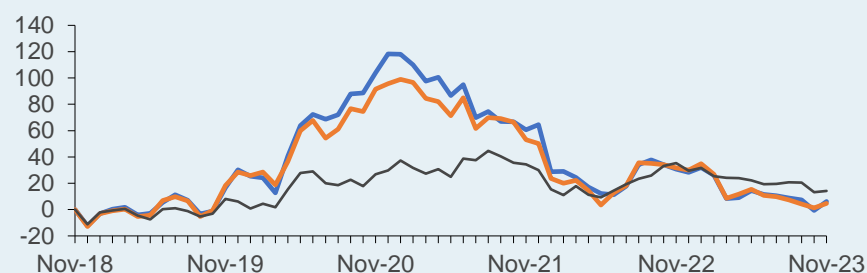
Portfolio Manager
Geoffrey Hsu

Portfolio Manager
Josh Golomb



Five Year Performance (%)

Past performance is not a guide to future performance. The value of investments and the income from them may fall as well as rise and is not guaranteed; an investor may receive back less than the original amount invested.



— Share Price (total return) 6.1%
— Net Asset Value per share (total return) 4.7%
— Benchmark: NASDAQ Biotechnology Index (sterling adjusted) +14.2%

Source: Morningstar, Index - Bloomberg.

Ten Largest Holdings as at 30 November 2023 (% of total investments)

Name	Total
Amgen	8.6
Biogen	5.9
Ionis Pharmaceuticals	5.8
BioMarin Pharmaceutical	5.7
Scholar Rock	5.4
Argenx	4.9
Vaxcyte	4.0
XtalPi	3.9
Neurocrine Biosciences	3.7
United Therapeutics	3.6
Total	51.5

Fast Facts		As at 30 November 2023
Launch Date	June 1997	
AIC Sector	Biotechnology & Healthcare	
	Date of Appointment of OrbiMed 19 May 2005	
Annual Management Fee (payable by the Company)	0.65% of net assets plus 0.30% per annum on the Company's market capitalisation up to £500m, 0.20% on market capitalisation above £500m to £1bn and 0.10% on market capitalisation over £1bn	
Performance fee	See Annual Report for details	
Ongoing Charges Ratio (OCR) *	1.1%	
Continuation Vote	2025 AGM and every 5th AGM thereafter	
Year / interim end	31 March / 30 September	
Capital Structure	34,975,477 Ordinary Shares of 25p	

Trust Characteristics

Number of Holdings	51
Net Assets (£m)	£287.4m
Market Capitalisation (£m)	£267.9m
Dividend Policy	It is not anticipated that the Company will pay a dividend
Gearing (AIC basis)	9.4%
Leverage**	Gross 109.5% Commitment 109.4%
Share Price (p)	766.00
NAV (p)	821.77
(Discount) / Premium	(6.8%)
Portfolio Turnover p.a.	90.4%
Active Share***	68.1%

Geographical Breakdown as at 30 November 2023 (%) †

North America	81.0%
Continental Europe	7.1%
China (quoted)	7.1%
Unquoted ‡	4.8%

Total **100.0%**

† Calculation based on economic exposure and expressed as a % of the total economic exposure. This includes all derivatives as an economically equivalent position in the underlying holding.

‡ No more than 10% of gross assets will be invested in unquoted investments at the time of acquisition. This limit includes any investment or commitment to invest in private equity funds managed by OrbiMed or an affiliate thereof. Investments or commitments to invest in such private equity funds will be limited to US\$15m, after the deduction of proceeds of disposal and other returns of capital. Of the 4.8% unquoted investments, 4.3% was in China and 0.5% was in Asia.

Source: All portfolio information sourced from Frostrow Capital LLP

Discrete Performance – Calendar Years (%)

Percentage Growth 12 Month Return	2018	2019	2020	2021	2022	YTD
NAV	-14.3	47.4	52.4	-23.1	-13.6	-19.5
Share Price	-19.9	48.5	67.7	-24.6	-22.1	-17.3
Index	-3.8	19.6	22.1	0.2	-0.3	-11.9

Standardised Discrete Performance (%)

Percentage Growth 12 Month Return	Nov 18- Nov 19	Nov 19- Nov 20	Nov 20- Nov 21	Nov 21- Nov 22	Nov 22- Nov 23
NAV	18.3	61.9	-20.1	-13.9	-20.5
Share Price	16.6	74.8	-21.2	-18.7	-18.8
Index	8.0	17.5	5.9	0.7	-15.6

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Source: NAV (total return; fully diluted) & Share Price (total return) – Morningstar. Index - Bloomberg.

*Calculated at the financial year end, includes management fees and all other operating expenses, excludes performance fees.

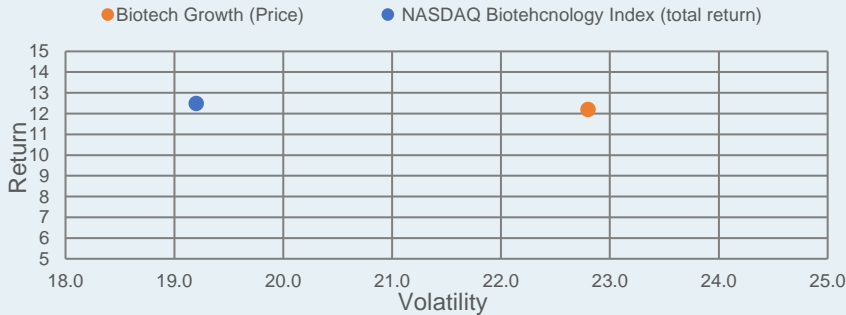
**The Board has set the leverage limit for both the Gross and the Commitment basis at 130% of the Company's Net Asset Value.

***Active Share is expressed as a percentage and shows the extent to which a fund's holdings and their weightings differ from those of the fund's benchmark index. A fund that closely tracks its index might have a low Active Share of less than 20% and be considered passive, while a fund with an Active Share of 60% or higher is generally considered to be actively managed.

Investment Policy

In order to achieve its investment objective, the Company invests in a diversified portfolio of shares and related securities in biotechnology companies on a worldwide basis. The Company will not invest more than 15% of the value of its gross assets in any one individual stock at the time of acquisition. No more than 10% of gross assets will be invested in unquoted investments at the time of acquisition. This limit includes any investment or commitment to invest in private equity funds managed by OrbiMed or an affiliate thereof. Investments or commitments to invest in such private equity funds will be limited to US\$15m, after the deduction of proceeds of disposal and other returns of capital. The Company's borrowing policy is that borrowings will not exceed 20% of value of the Company's net assets. The Company may be unable to invest directly or efficiently in certain countries or share classes. In these circumstances, the Company may gain exposure by investing indirectly through swaps or other derivative instruments. Exposure to these financial instruments will count towards and be subject to the following limits: Derivative transactions (excluding equity swaps) can be used to mitigate risk and/or enhance return and will be restricted to an aggregate net exposure of 5% of the value of the gross assets measured at the time of the relevant transaction; Equity swaps may be used for efficient portfolio management purposes and aggregate net counterparty exposure through a combination of derivatives and equity swap transactions is restricted to 12% of the value of the gross assets of the Company at the time of the transaction.

Return vs Volatility (Annualised since Date of Appointment of OrbiMed) – Chart (%)



Commentary

In November, the NAV per share was up 3.5%, the share price was up 6.7% and the benchmark NASDAQ Biotechnology Index (sterling adjusted) was up 0.9%.

Biotechnology bounced back in November on growing expectations of Federal Reserve (“Fed”) interest rate cuts in 2024, coupled with a decline in the 10-year U.S. government yield. The Company is overweight small cap biotech, which benefits from the easing of rates, and we increased gearing during the month to capitalize on the environment. We believe that we are in the final stages of Fed interest rate increases and that the 10-year yield has likely peaked.

One notable mergers and acquisitions (“M&A”) transaction was announced on Nov. 30. AbbVie announced a \$10.1 billion deal to acquire ImmunoGen, a pioneer in the field of antibody-drug conjugates. This represents almost a 100% premium from ImmunoGen’s last closing price and is also this year’s third largest biotechnology transaction. While the Company did not own ImmunoGen directly, other likely M&A candidates in the portfolio rose in sympathy upon the announcement. We continue to expect robust M&A activity in the emerging biotech space given Big Pharma’s urgency to acquire new biotech drugs to offset expected revenue losses from patent expirations of key products.

Rhythm Pharmaceuticals, Aerovate Therapeutics, and Vera Therapeutics were the largest positive contributors to performance during the month. Rhythm shares appreciated after it released third quarter earnings demonstrating continued growth of its flagship drug IMCIVREE for the treatment of genetic obesity. Aerovate outperformed after announcing completion of enrollment of its Phase 2b study of AV-101 for the treatment of pulmonary arterial hypertension, with trial results expected in mid-2024. Vera shares appreciated on no fundamental news.

Argenx, Compass Therapeutics, and BeiGene were the largest negative contributors to performance during the month. The share price of Argenx fell after reporting that its Phase 3 study in primary immune thrombocytopenia did not meet its endpoint. Compass underperformed in November following a delay in the data release of its colorectal cancer clinical trial, which will now have initial results before year end. We continue to view the company’s programs favorably and are looking forward to data from its pivotal trial in cholangiocarcinoma in 2H24. BeiGene’s share price declined on no fundamental news.

Codes

Sedol	0038551
ISIN	GB0000385517
Legal Entity Identifier (LEI)	549300Z41EP32MI2DN29
Global Intermediary Identification Number (GIIN)	U1MQ70.99999.SL.826
Bloomberg	BIOG LN
EPIC	BIOG

Discount / Premium Control Mechanism

The Directors have adopted an active discount management policy to establish and support an improved rating in the Company’s shares through the use of share buybacks, with a view to limiting the discount to NAV per share at which the shares trade to no more than 6%. Shares bought back will be cancelled.

How to Contact Us

Frostrow Capital LLP
25 Southampton Buildings
London, WC2A 1AL

Tel.: 0203 008 4910
Fax: 0203 043 8889

Website: www.frostrow.com
Email: info@frostrow.com

Risk Warnings

This document is for information purposes only and does not constitute an offer or invitation to purchase shares in the Company and has not been prepared in connection with any such offer or invitation. Before investing in the Company, or any other investment product, you should satisfy yourself as to its suitability and the risks involved, and you may wish to consult a financial adviser.

Any return you receive depends on future market performance and is uncertain. The Company does not seek any protection from future market performance so you could lose some or all of your investment. Shares of the Company are bought and sold on the London Stock Exchange (LSE). The price you pay or receive, like other listed shares, is determined by supply and demand and may be at a discount or premium to the underlying net asset value of the Company. Usually, at any given time, the price you pay for a share will be higher than the price you could sell it. For further information on the principal risks the Company is exposed to please refer to the Company's Annual Report or Investor Disclosure Document available at www.biotechgt.com. The Company can borrow to purchase investments, this could potentially magnify any losses or gains made by the Company.

Target Market

The Company is suitable for investors seeking an investment that aims to deliver total returns over the longer term (at least five years), is compatible with the needs for retail clients, professional clients and eligible counterparties, and is eligible for all distribution channels.

The Company may not be suitable for investors who are concerned about short-term volatility and performance, have low or no risk tolerance or are looking for capital protection, who are seeking a guaranteed or regular income, or a predictable return profile. The Company does not offer capital protection.

Value Assessment

Frostrow Capital LLP has conducted an annual Value Assessment on the Company in line with Financial Conduct Authority (FCA) rules set out in the Consumer Duty regulation. The Assessment focuses on the nature of the product, including benefits received and its quality, limitations that are part of the product, expected total costs to clients and target market considerations.

Within this, the assessment considers quality of services, performance of the Company (against both benchmark and peers), total fees (including management fees and entry and exit fees as applicable to the Company), and also considers whether vulnerable consumers are able to receive fair value from the product.

Frostrow Capital LLP concluded that the Company is providing value based on the above assessment.

Important Information

The Biotech Growth Trust PLC is a public limited company whose shares are premium listed on the LSE and is registered with HMRC as an investment trust. The Company has an indeterminate life, although shareholders consider and vote on the continuation of the Company every five years (the next such vote will be held in 2025).

This financial promotion is issued by Frostrow Capital LLP which is authorised and regulated by the Financial Conduct Authority ("FCA").
