

### 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 (net, total return, sterling adjusted).



**Portfolio Manager**  
Geoffrey Hsu

**Portfolio Manager**  
Josh Golomb



### Fast Facts

As at 30 November 2024

**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) \*** 1.2%

**Continuation Vote** 2025 AGM and every 5th AGM thereafter

**Year / interim end** 31 March / 30 September

**Capital Structure** 31,349,676 Ordinary Shares of 25p

### Trust Characteristics

**Number of Holdings** 67

**Net Assets (£m)** £329.5m

**Market Capitalisation (£m)** £302.5m

**Dividend Policy** It is not anticipated that the Company will pay a dividend

**Gearing (AIC basis)** 6.1%

**Leverage\*\*** Gross 108.1%  
Commitment 107.3%

**Share Price (p)** 965.00

**NAV (p)** 1,050.98

**(Discount) / Premium** (8.2%)

**Portfolio Turnover p.a.** 132.5%

**Active Share\*\*\*** 69.7%

### 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) +14.6%  
— Net Asset Value per share (total return) +13.2%  
— Benchmark: NASDAQ Biotechnology Index (net, total return, sterling adjusted) +25.8%\*

Source: Morningstar, \* Index – Bloomberg, with effect from 01.10.2024, the index is changed to net total return, prior to this date it was capital return.

### Ten Largest Holdings as at 30 November 2024 (% of total investments)

Name	Total
Neurocrine Biosciences	5.6
Sarepta Therapeutics	5.5
Alnylam Pharmaceuticals	4.7
Ionis Pharmaceuticals	4.5
Argenx	4.3
Avidity Biosciences	3.9
Dyne Therapeutics	3.7
Intra-Cellular Therapies	3.1
CG oncology	3.1
Vera Therapeutics	3.1
<b>Total</b>	<b>41.5</b>

### Geographical Breakdown as at 30 November 2024 (%)†

North America	82.9%
China (quoted)	7.6%
Continental Europe	6.7%
Unquoted ‡	2.8%

**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 2.8% unquoted investments, 2.5% was in China and 0.3% was in Asia.

Source: All portfolio information sourced from Frostrow Capital LLP

### Discrete Performance – Calendar Years (%)

Percentage Growth 12 Month Return	2019	2020	2021	2022	2023	YTD
NAV	47.4	52.4	-23.1	-13.6	-7.2	10.9
Share Price	48.5	67.7	-24.6	-22.1	-3.5	7.9
Index	19.6	22.1	0.2	-0.3	-1.7	6.7

### Standardised Discrete Performance (%)

Percentage Growth 12 Month Return	Nov 19- Nov 20	Nov 20- Nov 21	Nov 21- Nov 22	Nov 22- Nov 23	Nov 23- Nov 24
NAV	61.9	-20.1	-13.9	-20.5	27.9
Share Price	74.8	-21.2	-18.7	-18.8	26.0
Index	17.5	5.9	0.7	-15.6	19.0

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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 down 3.2%, the share price was down 4.1% and the benchmark NASDAQ Biotechnology Index (net, total return, sterling adjusted) was up 1.0%.

Biotech underperformed the general markets in November. The broader market rallied after the presidential election as investors were hopeful the Trump administration would enact business-friendly policies, but the impact on biotech stocks was far more mixed. News of President-elect Trump nominating Robert F. Kennedy Jr to run the Department of Health and Human Services, which includes the U.S. Food and Drug Administration (“FDA”), triggered a widespread selloff across the healthcare sector. Kennedy is a noted vaccine sceptic and has embraced controversial views about certain therapies in the past. He also does not have a favorable view of the pharmaceutical industry. As a result, investors became concerned that the FDA would become less science-based and that regulatory hurdles for the industry might increase. That uncertainty led to widespread selling of the biotech sector. Shares recovered somewhat in the second half of the month with the nomination of Marty Makary, a prominent surgeon, as FDA Commissioner. He is generally regarded as a science-based physician with less extreme views than Kennedy. While Kennedy’s nomination adds some uncertainty to the regulatory landscape in the U.S., there are questions about the likelihood of his confirmation in early 2025. If he is confirmed, we expect most of his efforts to focus on food-related issues rather than drug approvals. The Company’s underperformance versus the benchmark this month can be solely attributed to a decline in a single holding, XtalPi Holdings Ltd (previously QuantumPharm), a China-based artificial intelligence drug discovery company. Shares were weak heading into a lockup expiration expected in December.

Forte Biosciences, Agios Pharmaceuticals, and Rhythm Pharmaceuticals were the largest positive contributors to performance during the month. Forte’s stock price appreciated after it announced an oversubscribed equity financing to support the continuing clinical advancement of its drug FB102 across autoimmune indications. The Company participated in that financing. Agios’ stock price rose after data released on a competitor drug in the same class as Agios’ drug mitapivat showed clinical benefit in sickle cell disease, increasing investor confidence in Agios’ program. Rhythm’s stock price appreciated in November upon presentation of data from France showing encouraging efficacy for Rhythm’s drug Imcivree in hypothalamic obesity patients, increasing the perceived odds of success of an ongoing Phase 3 trial in that indication.

XtalPi (QuantumPharm), Amgen, and Lexicon Pharmaceuticals were the largest negative contributors to performance during the month. XtalPi (QuantumPharm) declined considerably during the month on no fundamental news, likely in anticipation of an IPO lockup expiry in December. Amgen announced underwhelming Phase 2 data for its obesity drug MariTide, leading investors to question whether the drug would be competitive in an increasingly crowded anti-obesity landscape. Lexicon shares declined following an FDA Advisory Committee voting against approval of its drug Zynquista for the treatment of diabetes.

#### Codes

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

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### 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](http://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 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").

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