

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).



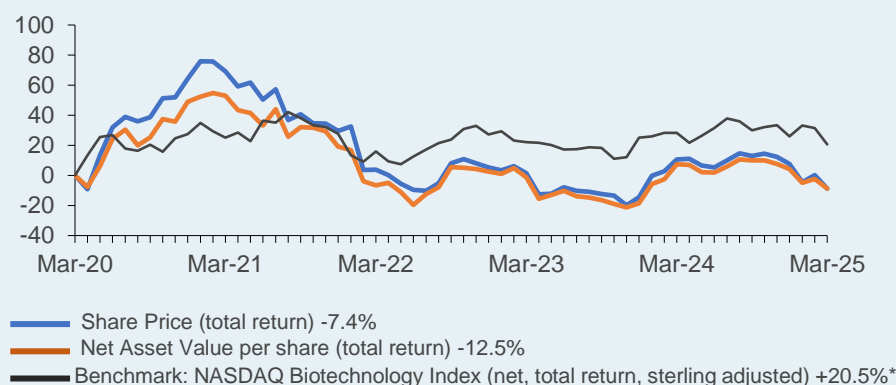
Portfolio Manager
Geoffrey Hsu

Portfolio Manager
Josh Golomb



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.



Source: Frostrow Capital LLP.

* Index – With effect from 01.10.2024, the index changed to net total return, prior to this date it was capital return.

Ten Largest Holdings as at 31 March 2025 (% of total investments)

Name	Total
Argenx	8.1
Gilead Sciences	7.9
Neurocrine Biosciences	5.3
Amgen	4.9
CG oncology	4.4
Avidity Biosciences	4.3
Alnylam Pharmaceuticals	4.2
Akeso	4.0
Tarsus Pharmaceuticals	4.0
Xenon Pharmaceuticals	3.8
Total	50.9

Fast Facts	As at 31 March 2025
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	27,112,591 Ordinary Shares of 25p

Trust Characteristics

Number of Holdings	59
Net Assets (£m)	£221.2m
Market Capitalisation (£m)	£204.4m
Dividend Policy	It is not anticipated that the Company will pay a dividend
Leverage**	Gross 105.9% Commitment 102.0%
Share Price (p)	754.00
NAV (p)	815.88
(Discount) / Premium	(7.6%)
Portfolio Turnover p.a.	136.5%
Active Share***	71.7%

Geographical Breakdown as at 31 March 2025 (%)†

North America	79.6%
Continental Europe	9.9%
China (quoted)	9.5%
Unquoted ‡	1.0%

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 1.0% unquoted investments, 0.6% was in China, and 0.4% was in Asia.

Source: All portfolio information sourced from Frostrow Capital LLP

Discrete Performance – Calendar Years (%)

Percentage Growth 12 Month Return	2020	2021	2022	2023	2024	YTD
NAV	52.4	-23.1	-13.6	-7.2	1.2	-14.9
Share Price	67.7	-24.6	-22.1	-3.5	-4.4	-11.8
Index	22.1	0.2	-0.3	-1.7	0.7	-4.3

Standardised Discrete Performance (%)

Percentage Growth 12 Month Return	Mar 20-Mar 21	Mar 21-Mar 22	Mar 22-Mar 23	Mar 23-Mar 24	Mar 24-Mar 25
NAV	55.1	-33.8	-11.0	26.5	-24.4
Share Price	75.2	-37.0	-12.8	27.1	-24.2
Index	25.1	-7.4	5.4	5.0	-6.0

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Source: Index & NAV (total return; fully diluted) & Share Price (total return) – Frostrow Capital LLP.

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

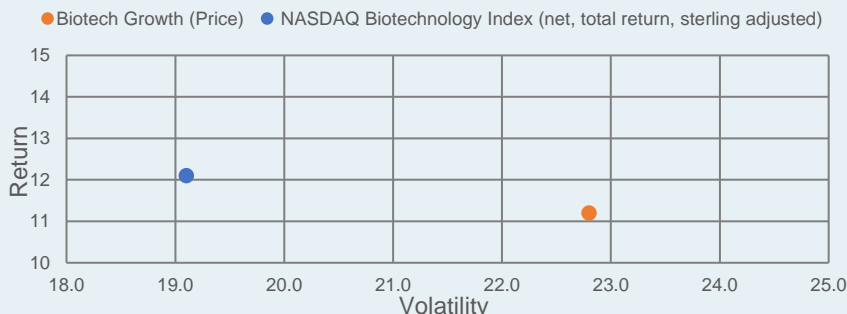
**The Board has set the leverage limit for both the Gross and the Commitment basis at 130% of the Company's Net Asset Value.

***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 March, the NAV per share was down 11.2%, the share price was down 7.7% and the benchmark NASDAQ Biotechnology Index (net, total return, sterling adjusted) was down 8.3%.

Broader markets were weak due to concerns about President Trump's tariff policies and a possible economic slowdown in the U.S.. The biotechnology sector came under pressure alongside the general market. Investors were particularly concerned that workforce reductions at the US Food and Drug Administration (FDA) and the departure of some senior leaders at the agency could potentially disrupt the FDA's ability to approve drugs in a timely manner. One notable departure at the end of the month was the resignation of Peter Marks, the director of the Center for Biologics Evaluation and Research, who had expedited the approval of COVID vaccines and had been a driving force in creating a highly flexible regulatory environment for cell and gene therapy products. The FDA is also facing the prospect of 3,500 job cuts under a reorganization plan unveiled on March 27. Notably, however, official statements from the Department of Health and Human Services (HHS) state that the reductions will not affect the drug review process, which is largely paid for by industry fees rather than by the government. In fact, the FDA has made a number of on-time approvals for drugs since Robert F. Kennedy Jr. was appointed head of HHS. We believe investor concerns over regulatory delays are exaggerated. Contrary to investor fears, we believe that the Trump administration wants to accelerate drug approvals by reducing regulatory roadblocks that delay novel drugs from reaching the market. Nevertheless, pre-revenue biotech companies that have yet to obtain approvals for their drugs were pressured more than their revenue-generating peers during the month due to investor concerns over possible regulatory delays. The Company's overweight exposure to pre-revenue names accounted for the underperformance versus the benchmark. Valuations ended the month with close to 30% of publicly traded biotech companies trading at market caps below the net cash on their balance sheets, a record low for valuations on this metric. We continue to be optimistic that the oversold conditions in small and mid-cap biotech will revert. As the risk for recession in the U.S. increases, we note that biotech has historically outperformed other sectors of the economy during a recession.

Tarsus Pharmaceuticals, Alnylam Pharmaceuticals, and Jiangsu Hengrui Pharmaceuticals were the largest positive contributors to performance during the month. Tarsus outperformed in March due to data showing continued strong growth in prescriptions for its drug Xdemvy for Demodex blepharitis, an eye condition. Alnylam's stock price appreciated in late March after the FDA approved its first-in-class drug Amvuttra for the treatment of a rare cardiomyopathy, unlocking a potential blockbuster commercial opportunity. Jiangsu Hengrui's stock experienced a significant rise in March after announcing an exclusive license agreement with Merck for HRS-5346, an investigational oral drug for atherosclerotic cardiovascular disease.

Sarepta Therapeutics, Compass Therapeutics, and C4 Therapeutics were the largest negative contributors to performance during the month. Sarepta Therapeutics is a commercial stage biotechnology company developing and marketing a portfolio of therapies targeting neuromuscular diseases, including a gene therapy called Elevidys for Duchenne muscular dystrophy. On March 18, Sarepta disclosed that a young man with Duchenne muscular dystrophy had passed away following treatment with Elevidys due to acute liver failure. We exited the entire Sarepta position on the day of the news due to uncertainty on Elevidys' commercial launch and the company's deteriorating outlook. Compass Therapeutics shares fell in March as investors derisked into Phase 2/3 trial results for the company's drug tovecimig in biliary tract cancer. C4 Therapeutics' stock price declined on no fundamental news, along with the broader biotech market.

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.

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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. 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 FCA.
