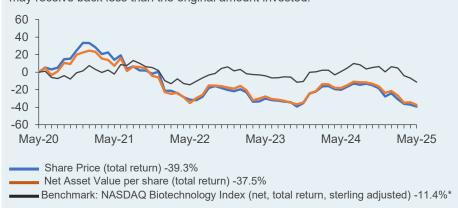


Investment Objective and Benchmark Index

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).

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 May 2025 (% of total investments)

Name	Total
Vertex Pharmaceuticals	9.9
Argenx	7.5
Alnylam Pharmaceuticals	5.0
CG oncology	4.3
Avidity Biosciences	4.2
Dyne Therapeutics	3.7
Catalyst Pharmaceuticals	3.5
Axsome Therapeutics	3.2
Xenon Pharmaceuticals	3.1
Ionis Pharmaceuticals	2.7
Total	47.1





Portfolio Manager Geoffrey Hsu

Portfolio Manager Josh Golomb

orbimed

Fast Facts	As at 31 May 2025
Launch Date	June 1997
AIC Sector	Biotechnology & Healthcare
Date of A	Appointment of OrbiMed 19 May 2005
	- 10 May 2000

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	26,228,997 Ordinary Shares of 25p

Trust Characteristics		
Number of Holdings 62		
Net Assets (£m)		£205.7m
Market Capita	alisation (£m)	£188.3m
Dividend It is not anticipated that the Policy Company will pay a dividend		
Gearing (AIC basis) 7.0		
Leverage**		Gross
		112.9%
		Commitment 111 7%
Share Price (p)	718.00
NAV (p)		784.26
(Discount) / P	remium	(8.4%)
Portfolio Turi	nover p.a.	136.5%
Active Share	***	69.7%



Geographical Breakdown as at 31 May 20	025 (%)†
North America	74.2%
China	14.0%
Continental Europe	10.9%
Unquoted ‡	0.9%

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 0.9% unquoted investments, 0.5% 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	-18.2
Share Price	67.7	-24.6	-22.1	-3.5	-4.4	-16.0
Index	22.1	0.2	-0.3	-1.7	0.7	-11.7

Standardised Discrete Performance (%)

Percentage Growth 12 Month Return	May 20- May 21	May 21- May 22	May 22- May 23	May 23- May 24	May 24- May 25
NAV	7.1	-39.7	11.7	13.6	-23.7
Share Price	14.0	-39.9	2.0	14.3	-23.9
Index	-2.2	-12.4	11.8	5.1	-12.0

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.

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.

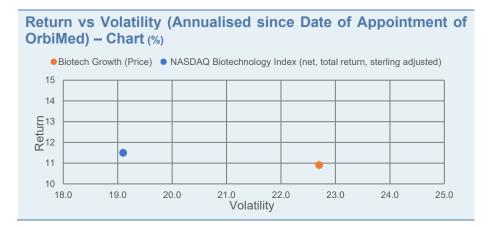
**The Board has set the leverage limit for both the Gross and the Commitment basis at 130% of the Company's Net Asset Value.

***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 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 US15m, 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.





Commentary

In May, the NAV per share was down 4.7%, the share price was down 3.5% and the benchmark NASDAQ Biotechnology Index (net, total return, sterling adjusted) was down 4.9%.

Biotech underperformed the general markets in May as the sector was pressured by a number of drug policy concerns. Trump issued an executive order on May 12 announcing a most-favored-nation (MFN) drug pricing model under which U.S. drug prices would be priced in-line with drug prices in developed European countries. He had proposed a similar idea during his first term in 2020, but the proposal was never implemented. The aim is to equalize drug pricing between the U.S. and Europe such that U.S. citizens no longer pay much higher prices for drugs compared to their European counterparts. If MFN is implemented, it could pressure profitability of the biopharmaceutical industry as it would effectively apply ex-U.S. price controls to the U.S. market. Although investors suspect MFN will likely not be instituted in any meaningful way, the uncertainty will likely remain an overhang for the sector in the near term. Additionally, investors still await the Trump administration's unveiling of tariffs on the pharmaceutical sector.

In early May, Food and Drug Administration (FDA) Commissioner Dr. Marty Makary named Dr. Vinay Prasad as the next director of the FDA's Center of Biologics Evaluation and Research (CBER), the center that approves gene and cell therapies. Initial reactions to the appointment were negative, as Dr. Prasad had previously been critical of the FDA for having overly lax regulatory approval standards. This stance appeared to conflict with the initiatives laid out by Dr. Makary, which had promoted more regulatory flexibility. We continue to believe that the Trump administration would like the FDA to approve safe and effective drugs as expeditiously as possible. We expect the sector to recover as political overhangs abate and investors appreciate that some of the recent biotech industry proposals will not have significant negative impact.

ADC Therapeutics, Alnylam Pharmaceuticals, and InventisBio were the largest positive contributors to performance during the month. ADC Therapeutics outperformed in May after it announced potential best-in-disease efficacy and tolerability from its approved drug, Zynlonta, in combination with Columvi in a lymphoma study. Alnylam's stock price appreciated after the company disclosed strong initial 1Q U.S. Amvuttra launch metrics for a recently approved indication, suggesting potential sales acceleration above full-year guidance. InventisBio's stock experienced a significant rise in May in anticipation of a business development deal for their potential best-in-class drug for plaque psoriasis.

Vertex Pharmaceuticals, Xenon Pharmaceuticals and Argenx were the largest negative contributors to performance during the month. Vertex underperformed in May after missing revenue expectations for its quarterly earnings. Xenon's stock price fell in May upon the announcement that registrational data for its lead drug, azetukalner, was delayed to early 2026. Argenx's stock price declined after missing high expectations for Vyvgart sales in the first quarter earnings report.

Codes		
Sedol	0038551	
ISIN	GB0000385517	
Legal Entity Ide	ntifier (LEI)	
	549300Z41EP32MI2DN29	
Global Intermed	liary	
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

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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 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 will be held in 2025).

This financial promotion is issued by Frostrow Capital LLP which is authorised and regulated by the FCA.