

**The Biotech Growth Trust PLC
(the “Company”)**

THE BIOTECH GROWTH TRUST PLC COMMITMENT TO PREVENT THE FACILITATION OF TAX EVASION

The Board of The Biotech Growth Trust PLC has adopted a zero-tolerance approach to the criminal facilitation of tax evasion.

Accordingly, it expressly prohibits any Director, suppliers, agents or third parties, when acting on behalf of the Company, from facilitating tax evasion on behalf of the Company.

The Directors of The Biotech Growth Trust PLC recognise their responsibilities in ensuring that the Company has a robust policy to avoid such practices and to ensure compliance with its legal obligations. The Board requests that it is informed immediately of any identified instances of tax evasion within any of its principal service providers and details of the corrective courses of action taken.

As part of a risk-based approach, the Board will carry out an annual risk assessment on matters relating to tax evasion, involving due diligence enquiries in respect of persons who perform or will perform services for or on behalf of the Company, in order to mitigate identified risks. Due diligence records will be kept and be made available for inspection by the statutory auditor.

The Board will review this policy on an annual basis and will ensure that it is publicly available on the Company’s website.

Principal Service Providers

OrbiMed Capital LLC – Portfolio Manager

Frostrow Capital LLP – Alternative Investment Fund Manager

J.P. Morgan Europe Limited – Depositary

J.P. Morgan Securities LLC – Prime Broker and Custodian

MUFG Corporate Markets - Registrar

BDO LLP - Auditor

November 2025