

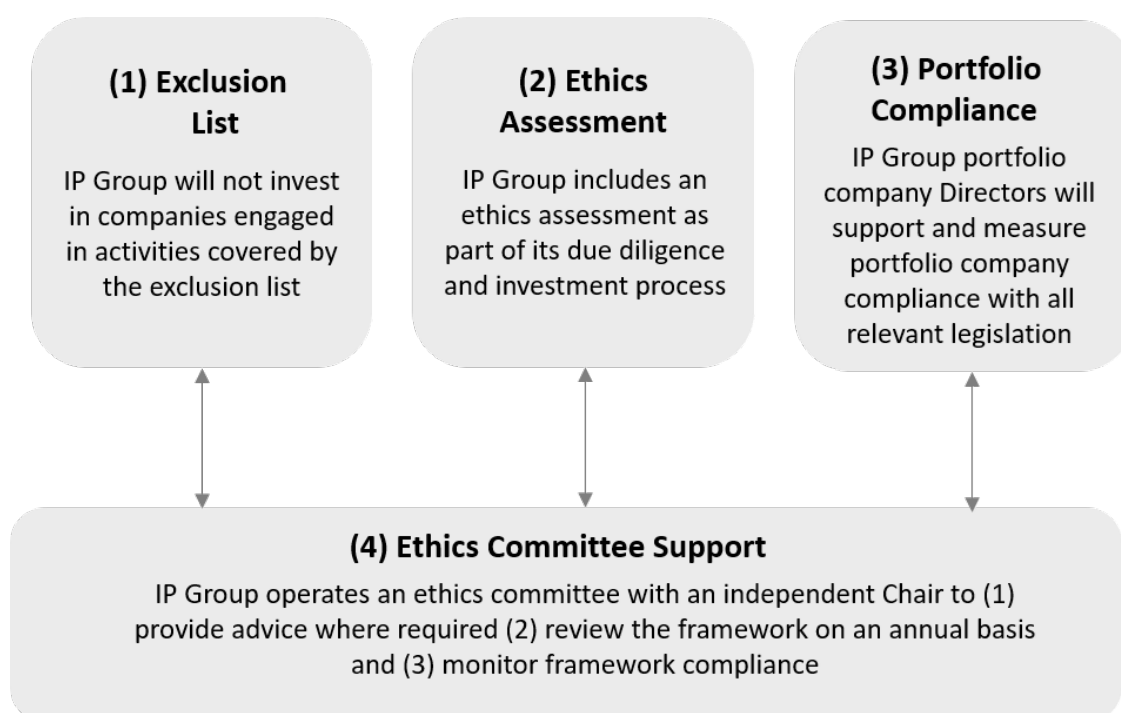
IP Group and Parkwalk Ethical Investment Framework

Adopted by the Board in September 2021 and reviewed in May 2024

IP Group plc (“**IP Group**” or “**the Group**”) invests into companies with a focus on producing positive change in the Life Sciences and Technology sectors. Environmental, Social and Governance (“**ESG**”) aims are embedded in the Group’s culture, investment processes and portfolio management.

This document outlines IP Group’s ethical investment framework (“**EI Framework**”). This framework is reviewed on an annual basis by the Group’s ESG Committee.

Ethical investment at IP Group is based on the following four pillars:



The principles are considered from a general and sector specific viewpoint in the EI Framework:

1) Exclusion List

The exclusion list applies to all new investments, and acquisitions that are made by portfolio companies that require IP Group's consent or funding.

General

IP Group will not invest in businesses:

- that are involved in the production of, or trade in, any product or activities deemed illegal under applicable local, national or international laws or regulations, or subject to internationally agreed phase-outs or bans as defined in global conventions and agreements, including:
 - slavery, human trafficking, forced labour, compulsory labour or harmful child labour;
 - hazardous substances, chemicals, pharmaceuticals, pesticides or wastes;
 - ozone depleting substances; or
 - endangered or protected wildlife or wildlife products;
- that produce, market, use or trade in weapons of mass destruction, inhumane weapons or technologies that are subject to international prohibitions;
- whose primary purpose is to operate in the following sectors:
 - tobacco and distilled alcoholic beverages and related products; or
 - pornography; or
- gambling facilities (including casinos and internet gambling and/or online casinos);
- where the business:
 - is, or any of its direct owners or controllers are, on a sanctions list of the UK, EU, UN, US or any other relevant body or jurisdiction;*
 - supplies or purchases products, goods or services to or from persons in countries or regions where such activities are either prohibited or restricted by sanctions; or
 - is located or has any known operations in a country subject to comprehensive/country-wide sanctions;
- that do not agree to comply with IP Group's policies on anti-bribery and corruption and the anti-facilitation of tax evasion.

*Where the Ethics Committee is or becomes aware that any indirect owner or controller of the relevant business is on a sanctions list of the UK, EU, UN, US or any other relevant body or jurisdiction, or where there is any other indirect link to any person or entity on any of the aforementioned sanctions lists, the Ethics Committee will consider the issue and make any decision on whether or not IP Group should proceed with the investment on a case by case basis.

Life Sciences

In addition to the general exclusions above and in relation to its Life Sciences sector investments, IP Group will not invest in businesses who have been or are currently engaged in:

- the testing of cosmetic products on animals;
- any activity that could result in bioterrorism;
- human cloning for reproduction purposes;
- genetic modification of human embryos; or
- use great apes for research and development, or any other activity.

Technology

In addition to the general exclusions above, in relation to its Technology sector investments, IP Group will not invest in businesses who have been or are actively engaged in:

- developing technology for extraction of fossil fuels as their primary business;
- extraction of fossil fuels, including oil and gas exploration and production or mining of coal or tar sands; or
- production or sales or trading in weapons or munitions of any kind.

2) Ethics Assessment

An ethics assessment is included in all IP Group Investment Committees' papers. These are reviewed by the relevant Life Sciences or Technology Investment Committee and any discussion regarding ethics is reported in the Investment Committee meeting minutes. Investments are only made that have the aim of resulting in benefit and to minimise the risk of harm. Where there is no consensus on a particular ethics question or further advice is required, the Investment Committee can refer to the Ethics Committee for guidance.

Activities deemed to be high-risk (listed below) should be specifically addressed by the Investment Committee and if further input is required, referred to the Ethics Committee. High-risk activities are not automatically referred to the Ethics Committee.

In cases where an investment is not referred to the Ethics Committee and material ethical concerns are subsequently raised, it will be the responsibility of the members of that Investment Committee (e.g. the investing Partners) to justify their decision.

For the avoidance of doubt, the purpose of the Ethics Committee is to provide advice to Investment Committees; it is not intended that the Ethics Committee will make investment decisions or monitor or audit the relevant Investment Committee.

General

High-risk activities are:

- Co-investment by high risk individuals or organisations, for example those that require enhanced due diligence under anti money laundering legislation;
- Co-investment by, or investment alongside, parties or organisations who the Investment Committee consider could bring IP Group into disrepute;
- Businesses deriving revenue from the manufacture or trade in chemicals of concern without stringent policies, processes or practices to mitigate the harmful impact of their products;
- Companies that have been linked to bad employment practices, such as not paying the minimum wage, or other abuses of employees; and
- Companies which engage in poor business practices that cause harm to society or their employees (such as predatory lending).

Life Sciences

High risk activities are:

- the development of or trade in human cells, body parts or organs;
- the use of human embryonic stem cells;
- the development of genetically modified seeds, crops and/or organisms for agricultural use;
- the conduct of clinical trials involving children;
- the conduct of clinical trials in the developing world; and
- the conduct of research on non-human primates.

Physical Sciences

High risk activities:

- technology intended to illegally enter electronic data networks or download electronic data;
- the development of nuclear energy; and
- the development of military technologies.

3) Portfolio Compliance

IP Group portfolio companies should comply with all relevant local and international legislation, and where appropriate relevant international standards. They should be committed to treating their employees fairly; maintaining safe and healthy working conditions and upholding the highest standards of research and development and business integrity.

IP Group will use its influence as an investor to promote a commitment to strong corporate governance in its portfolio companies, including supporting the implementation of ESG principles such as the mitigation of adverse environmental and social impacts, and enhancing positive effects on the environment, workers and relevant stakeholders.

Where the Group has a director on the Board of an IP Group portfolio company, such directors will seek to (1) ensure that portfolio companies have appropriate policies in place and support their implementation (taking into account the portfolio company's stage and resources) and (2) review compliance on a periodic basis.

Policies are expected for both general and sector specific activities. In particular, IP Group would encourage all portfolio companies to have the following policies:

General

- health and safety;
- equal opportunities and diversity;
- anti-harassment and bullying;
- anti-corruption and bribery;
- prevention of the facilitation tax evasion;
- whistleblowing or speaking up; and
- data protection.

Life Sciences

- Use of animals
 - IP Group recognise that animal studies are required for the development of new pharmaceuticals and/or medical devices. IP Group's portfolio companies are required to have policies in place to ensure the companies operate to the highest standards of animal welfare and in full compliance with the law.
- Clinical research
 - Clinical studies are an important part of developing new treatments for human disease. IP Group believes that safety is paramount for all clinical studies. IP Group's portfolio companies will have a framework which ensures they conduct studies in accordance with ethical and regulatory guidelines.

Physical Sciences

- Environmental: minimisation of environmental impact from business operations, including waste and water management policies.

Where IP Group does not have a directorship, the Group will use reasonable endeavours to inform portfolio companies of the relevant international legislation and seek to ensure the required compliance.

4) Ethics Committee

IP Group has an Ethics Committee in place to discuss questions of ethics and review key areas of risk on an annual basis. The purpose of the Ethics Committee is to:

- 1 Provide guidance on referred ethical issues to the Life Sciences or Technology partnership (a “**Partnership**”) or the Board;
- 2 Monitor compliance with this EI Framework; and

Review this EI Framework on an annual basis and, if necessary, make recommendations to the Board for approval. The Ethics Committee is chaired by an Independent Chair, Professor Gordon Clark, and also comprises the Chief Operating and Finance Officer, General Counsel, UK, and representatives from the Partnerships and other members of the Group. Other individuals are invited to attend all or part of the meeting when deemed appropriate and necessary. Appointments to the Ethics Committee will be for a period of two years, with an optional two year extension.

The Ethics Committee meets twice per year and on an ad hoc basis when issues arise, following the referral of a matter from the Partnerships or the Board. The Chair of the Ethics Committee will report back to the Board on a periodic basis.

Overseas and Parkwalk operations

The Parkwalk and IP Group Australia teams shall have the option to set up a separate local Ethics Committee in the relevant jurisdiction. Any such local Ethics Committee will meet on a periodic basis to:

- provide guidance on referred ethical issues to the investment teams in the relevant jurisdiction/business;
- monitor compliance with this EI Framework;
- discuss the local application of this EI Framework and ensure consistency on a global level;
- make recommendations to the Board on the EI Framework or the global application of such EI Framework as applicable; and
- report to the main Group Ethics Committee in order to ensure that application of this Framework and the Group ESG Policy is consistent across the Group.