

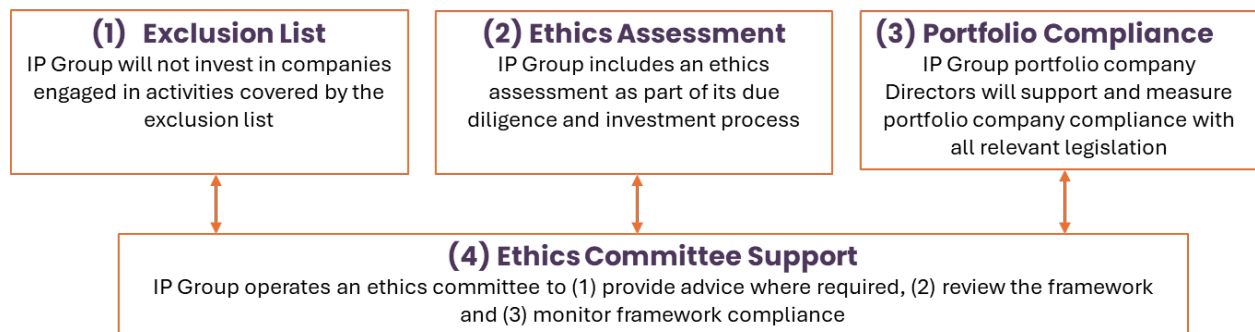
IP Group and Parkwalk Ethical Investment Framework

Adopted by the Board in September 2021 and
last reviewed in October 2026

IP Group plc ("**IP Group**" or "**the Group**") invests into companies with a focus on producing positive change in the Healthtech, Deeptech and Cleantech 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 Board of Directors.

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) Outright Exclusion List

The Outright Exclusion list applies to (i) all portfolio company investments; and (ii) all 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 Controversial Weapons (as defined in Appendix 1);
- 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); or
- that do not agree to comply with IP Group's policies on anti-bribery and corruption and the anti-facilitation of tax evasion.

Healthtech

In addition to the general exclusions above and in relation to its Healthtech 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
- using great apes for research and development, or any other activity.

Deeptech and Cleantech

In addition to the general exclusions above and in relation to its Deeptech and Cleantech 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; or
- the extraction of fossil fuels, including oil and gas exploration and production or mining of coal or tar sands.

2) Red Flag list and Ethics Assessments

An ethics assessment is included in all IP Group Investment Committees' papers. These are reviewed by the relevant Investment Committee and any discussion regarding ethics is reported in the Investment Committee meeting minutes. Where there is no consensus on a particular ethics question or further advice is required, the Investment Committee can refer the matter to the Ethics Committee for guidance.

Activities deemed to be high-risk (listed below) known as "red flag" activities should initially be addressed by the Investment Committee during its meeting and documented in the meeting minutes. Should the Investment Committee wish to recommend an investment, a detailed briefing paper must then be referred to the Ethics Committee for advice on the ethical issue.

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

General

Red flag 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).

Healthtech

Red flag 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.

Deeptech and Cleantech

Red flag activities are:

- technology intended to illegally enter electronic data networks or download electronic data;
- the development of nuclear energy; and
- activities relating to Conventional Defence (as defined in Appendix 1).

Nb the Group's position in relation to investment in the **Security, Defence and Resilience** ("SDR") sector is set out in a separate SDR Policy, which has been determined by the Group's Investment Committee. Within the parameters of the SDR Policy, investments into Dual-Use Technology (as defined in Appendix 1) will be eligible for investment from an ethical perspective and do not need to be referred to the Ethics Committee before investment, unless there are exceptional circumstances that exist which the Investment Committee believes merits the involvement of the Ethics Committee, at which point such issue will be treated in the same way as a "Red Flag" activity.

Sanctions

An investment will also be considered a "Red Flag" 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.

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.

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 of tax evasion;
- whistleblowing or speaking up; and
- data protection.

Healthtech

- **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.

Deeptech and Cleantech

- **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:

- provide guidance on referred ethical concerns and issues which arise in relation to the Group's business and its portfolio companies, and to facilitate solutions to such matters; and
- monitor compliance with this EI Framework across balance sheet investments (Healthtech, Deeptech and Cleantech), Parkwalk and IPG Australia.

The Ethics Committee operates under agreed Terms of Reference.

Appendix 1 - Security, Defence and Resilience (“SDR”)

In this Ethical Investment Framework (including this Appendix 1) the following definitions apply:

Controversial Weapons means weapons of mass destruction, inhumane weapons or technologies that are subject to international prohibitions (including, but not limited to, cluster munitions, anti-personnel landmines, biological weapons, chemical weapons, nuclear weapons, and weapons or components whose primary designed function is to serve such systems);

Conventional Defence means platforms, systems, munitions, services and infrastructure principally designed for military use that do not fall within Controversial Weapons — including, without limitation, armoured vehicles, naval vessels, combat aircraft, small arms and associated conventional munitions, and prime contracting more generally; and

Dual-Use Technology means technology, software, hardware or services with substantial application in both civil/commercial and defence/security markets — including AI and autonomy software, cyber security, secure communications, space and satellite systems, sensors, unmanned/autonomous systems, and logistics or sustainment technology.

Any investment into (i) Conventional Defence on which the Ethics Committee has advised and (ii) Dual-Use Technology will be subject to enhanced levels of due diligence. It is the responsibility of the Investment Committee to ensure that the correct investment and due diligence procedures are carried out prior to any such investment being made.