

Last updated 24 May 2021

Intuitive Investment Group plc - Conflicts Policy

Circumstances may arise where investment opportunities will be available to the Company which are also suitable for one or more of the Board or Investment Committee in a personal capacity, or where a Director / Investment Team member already has an interest. The Company seeks to manage any such conflicts and ensure, in particular, that any transactions are effected on terms which are not materially less favourable to the Company than if the potential conflict had not existed. In particular, the Board / Investment Team will endeavour to ensure that the Company has the opportunity to participate in potential investments which fall within the Company's investment objective and policy, on the best terms reasonably obtainable at the relevant time.

1. In respect of any investment being considered, each Board and Advisory Panel member must disclose their direct or indirect economic interests or relationships and that interest must be registered in The Conflicts of Interest Register which is to be held and monitored by Robert Naylor and tabled at each Board meeting.

2. In the event that any Board Member has any potential or perceived conflict of interest in relation to a specific investment or investment opportunity, they will not be able to participate in any decision relating to that investment. Any investment decision where a conflict exists will require the unanimous approval of those Board members able to vote, and will inform the Company's Nomad in advance of entering into final deal documentation. If the Company is required to issue an RNS, the Company will discuss with the Nomad whether there is a need for the conflict to be noted in the Company's announcement regarding the investment, noting which Board Members were conflicted, the reasons for the conflict and that they did not participate in the decision-making process for that investment.

3. In respect of any listed investment, in the Healthcare or Life Sciences sectors, the Investment team will issue on an ad hoc basis when a new investment is under consideration, and at each Board meeting, a list of Healthcare or Life Sciences sectors companies where investments are already held by the Company. This list is private and confidential and Healthcare or Life Sciences sectors companies on this list should be regarded as restricted ("Restricted Companies List"). If a Board Member or a member of the Investment Team wishes to execute a transaction on their own account in the shares of a company on the Restricted Companies List, they must notify the Chairman or Senior Independent Non-Executive Director prior to any transaction being executed (save for where such investment is executed by a fund manager or equivalent on a fully discretionary basis).

4. Board Members and Advisory Panel Members can, subject to permission being granted by the Board, participate personally in any (potential) investee Company investment, but in such circumstances they will not be able to participate in any Board and /or Investment Team decision relating to that Investment and such participation should not impact the Company's ability to invest or effect the quantum of such investment (due to scaling back or otherwise).

5. In the event that any transaction constitutes a Related Party Transaction as defined in Rule 13 of the AIM Rules, the CEO / Company Secretary will inform the Company's Nomad at the earliest opportunity ahead of the transaction being executed in order to ensure the Company complies with the AIM Rules.

6. Where a member of the Board or Advisory Panel is appointed to the board of an investee company or holds an interest in any investee company, the full details of such interest will be disclosed in the Company's interim and annual financial statements.

7. Where the Board members / Investment Team become aware of an investment opportunity in the Healthcare or Life sciences sectors that may be available and of interest to the Company, it shall disclose such opportunity to the Company and, if the Board member / Investment Team is able to do so, afford the Company the opportunity to undertake the transaction on the same terms as those being offered to the relevant member.