

External Conflicts of Interest Policy

Prescient employees must avoid any activities, situations or relationships that might interfere with, or appear to interfere with, their obligations to Prescient and our clients or that may restrict Prescient's activities (in each case, a "Conflict of Interest").

Commitments to, interests in or relationships with organizations and/or people related to the pharmaceutical, life sciences or biopharmaceutical industry ("Situations") must be disclosed to Compliance@prescienthg.com through an Outside Interests Disclosure Form (Appendix 1) so that the Compliance Team and Prescient's management can determine whether the Situation represents a Conflict of Interest. If a Conflict of Interest is identified, a decision will be made about how to mitigate the risk posed to Prescient and/or its clients.

Note: Prescient's approach to preventing Conflicts of Interest that would compromise the confidentiality of client information based on employees being assigned to similar projects is described in its "Competing Activities Policy".

Outside Business Interests

Employees must promptly notify Prescient of any outside business interests ("OBIs") they have, including private investments and outside business activities (even if uncompensated). Examples of OBIs to disclose include:

- Owning shares or other types of equity in a company in the pharmaceutical, life sciences or biopharmaceutical space
- Holding directorships (including in not-for-profit entities) and partnerships
- Receiving compensation from another person or entity for business activities
- Being employed by, or acting as a consultant for, another person or entity
- Receiving any form of compensation for an external work product, such as a book, article or speech
- Holding an elected or appointed political or governmental position

Employees must submit an update through Compliance@prescienthg.com if any material changes occur to their OBI after the initial notification (e.g., a private investment has been liquidated, the scope of an outside business activity has materially changed).

Personal Relationships

The existence of a romantic/intimate or family relationship between individuals can create (or be perceived to create) the opportunity for one party to exert improper influence over the other. Employees must notify Prescient if they have a close family member (i.e., parent, grandparent, sibling, child) or romantic partner who is any of the following:

- An employee or official of a regulatory or other governmental agency in the pharmaceutical, life sciences or biopharmaceutical space
- An employee, shareholder or board member of a company in the pharmaceutical, life sciences or biopharmaceutical space

- An employee, shareholder or board member of a vendor of Prescient
- An employee, shareholder or board member of a competitor of Prescient
- A fellow employee of Prescient (see “Relationships at Work Policy”)

Personal Trading and Investing

As defined by the United States Securities and Exchange Commission, illegal insider trading is “buying or selling a security, in breach of a...relationship of trust and confidence, on the basis of material, non-public information about the security”. Acting on insider information can carry civil or criminal penalties up to and including imprisonment.

Employees may be exposed to sensitive information about Prescient’s clients, Prescient’s clients’ competitors and/or Prescient’s clients’ partners. Any information that an employee receives or collects from a client or another company that is not in the public domain could potentially be considered material by the respective entity or a regulator. Employees are therefore forbidden from making direct or indirect investment decisions on the basis of such information. In particular, employees must not:

- Take a short or long position in the stock of a company A) they are supporting as part of an engagement or business development activity, or B) about which they are collecting or receiving information as part of an engagement or business development activity
- Engage in personal trading and investment activities in the pharmaceutical, life sciences, biopharmaceutical or other sectors that would result in legal, business or ethical conflicts for Prescient or our clients, or otherwise appear improper
- Use non-public information regarding a pending transaction or event to take a long or short position in a company’s stock for their own gain or on someone else’s account
- Engage in personal trades that mirror those that a client or business unit has executed or is about to execute

The restrictions above do not apply to shares traded as part of pooled funds or professionally managed portfolios for which employees do not make active decisions concerning individual stocks.

Penalties apply not only to those individuals who make illegal insider trades, but also to individuals who provide insider information (“tips”) to third parties. Employees are therefore forbidden from discussing client or other sensitive information with any unauthorised parties, including their spouses, financial dependents and brokers.

Employees shall certify on an annual basis that, in the previous year, they have not acted on non-public or otherwise sensitive information in violation of this policy and that all Situations have been declared to the Compliance Department (Appendix 2).

Document History

Version	Date	Comment	Owner
0.1	2022-03	First draft based on external policy	Nick Denison-Pender
0.2	2022-04	Initial round of revisions	Courtney Carlson, Alex Panayi
0.3	2022-04	Stakeholder feedback	Prescient Business Council
0.4	2022-04	Incorporation of feedback	Courtney Carlson
0.5	2022-06	Update following further clarifications from CFO; insertion of disclosure form and recertification templates	Courtney Carlson
0.6	2022-06	Revisions to include personal relationships in scope for potential conflicts of interest	Courtney Carlson
0.6	2022-06	Review and feedback of revisions to expand scope	Alex Panayi
1.0	2022-06	Incorporation of feedback from CFO and sign-off from Prescient Business Council	Courtney Carlson
1.0.1	2022-09	Subject matter expert review	Nick Turner
1.0.2	2022-10	Grammar and syntax QC	QC Team
1.1	2022-10	Finalisation for distribution	Courtney Carlson

Appendix 1

OUTSIDE INTERESTS DISCLOSURE FORM

Employee's Name: _____

This Outside Interests Disclosure Form should be used to notify Prescient that an employee or a close family member¹ of an employee has an economic interest in, or acts as an officer or a director of, any outside entity whose financial interests would reasonably appear to be affected by the individual's employment with Prescient Healthcare Group. The individual should also disclose any personal, business or volunteer affiliations that may give rise to an actual or potential conflict of interest. Please do not disclose the names of any close family members and only use relationships to describe the outside interest.

Please describe below:

- Any economic interests or investments you or a close family member hold in any life sciences companies
- Non-profit and for-profit boards on which you or a close family member sit
- For-profit businesses for which you or a close family member are an officer, director or majority shareholder
- Other companies of which you are an employee
- Any businesses you or a close family member own
- Any government agencies of which you or a close family member is an employee or official
- Any other outside interests you or a close family member have that could influence or be influenced by your position at Prescient Healthcare Group

I have the following outside interests to report:

1. _____

2. _____

3. _____

Note: Attach additional sheets if necessary. If you have no outside interests to report, write "none" above.

¹ For the purposes of this form, a "close family member" is to be understood as (i) the individual's spouse or legal partner, and any other person who shares the same household with the individual; (ii) the children and parents of the individual, and the individual's spouse/legal partner; and (iii) the financial dependents of the individual and the individual's spouse/legal partner.



I hereby certify that the information set forth above is true and complete to the best of my knowledge. I understand that my obligation to inform the Compliance Department of any outside business or economic interests is an ongoing one and that I will make any relevant disclosures immediately. I also understand that my failure to provide complete and accurate information could result in discipline, including termination. I acknowledge that Prescient Healthcare Group reserves the right to change its disclosure requirements at any time, with or without notice (subject to applicable law) and that such requirement is not a contract of any kind.

Signature:

Date:

Appendix 2

ANNUAL COMPLIANCE CERTIFICATION FORM**Business Interests and Investments**

I, _____ (Employee's Name), hereby certify that, in the past 12 months:

- I have reported all of my outside business interests (OBIs) to Prescient Healthcare Group's Compliance Department
- I have notified the Compliance Department about any changes in my previously reported OBIs
- I have not engaged in personal trading and investment activities in the pharmaceutical, life sciences, biopharmaceutical or other sectors that would result in legal, business or ethical conflicts for Prescient Healthcare Group or its clients, or otherwise appear improper
- I have not traded any stocks or made any other investment decisions based on any non-public information
- I have not disclosed client or other sensitive information to any unauthorised parties

Relationships

I, _____ (Employee's Name), hereby certify that, in the past 12 months, I have notified Prescient Healthcare Group in the event that a close family member or romantic partner was:

- An employee or official of a regulatory or governmental agency in the pharmaceutical, life sciences or biopharmaceutical space
- An employee, shareholder or board member of a company in the pharmaceutical, life sciences or biopharmaceutical space
- An employee, shareholder or board member of a vendor of Prescient
- An employee, shareholder or board member of a competitor of Prescient
- A fellow employee at Prescient

Signature:

Date: