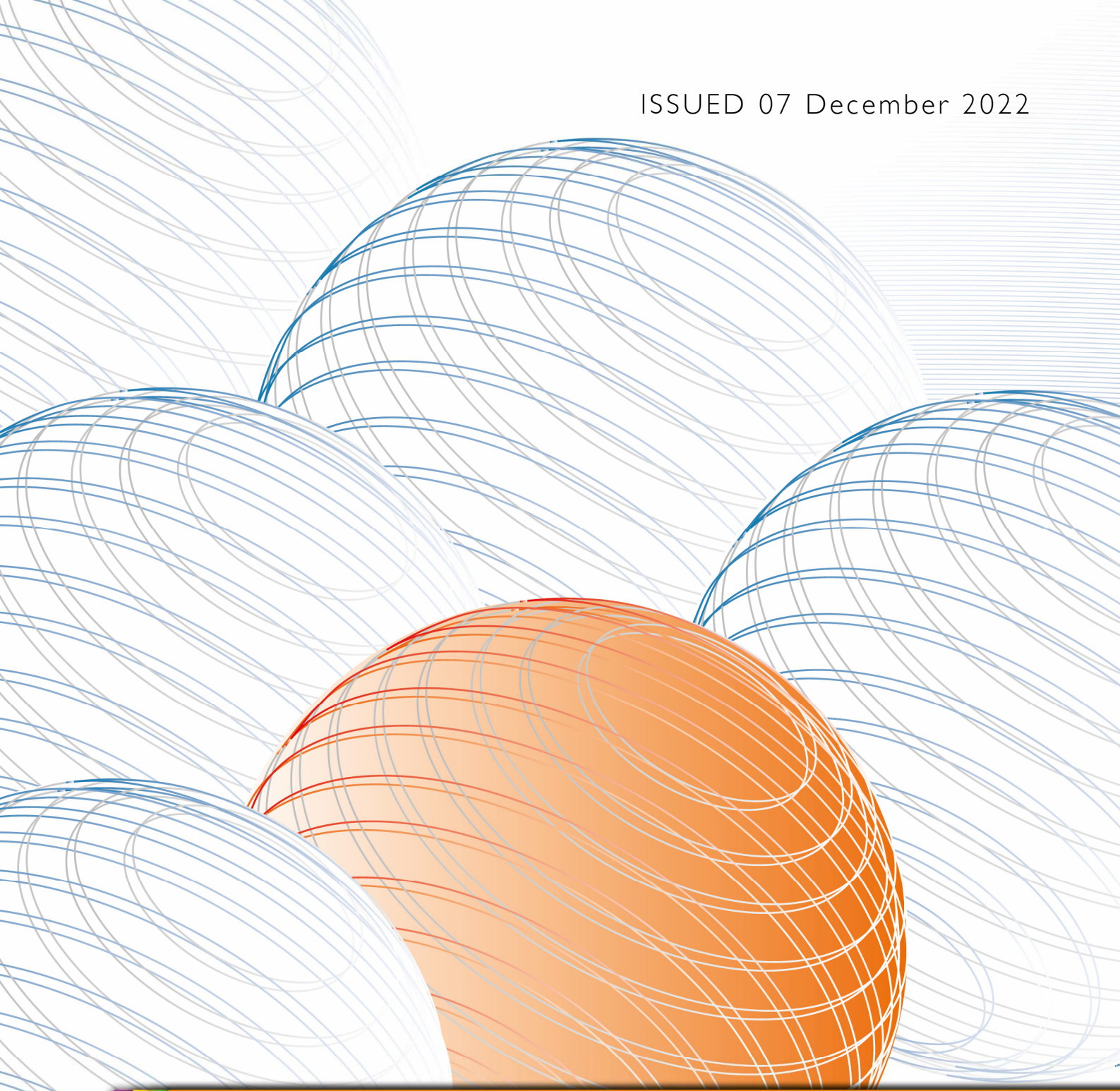


ISSUED 07 December 2022



DFM SECTOR
Seven Investment Management

FINANCIAL STRENGTH ASSESSMENT

Analysis by **AKG Financial Analytics Ltd**
Accessible • Comparative • Independent

AKG



ABOUT THIS FINANCIAL STRENGTH ASSESSMENT

This AKG report and the analysis and ratings contained within it provide assessment of financial strength and associated considerations. Financial Strength is focused on the ability of a company to deliver ongoing operational capability in the interest of its customers and in line with their fairly held expectations. AKG's perspective in the assessment of financial strength is wholly that of a customer of a product or service. From that foundation, this analysis is specifically designed to inform financial advisers and assist in their required understanding of a company's operational financial strength.

Given the underlying customer perspective, the financial strength of companies needs to be focused at an operational level, specifically on the company that is effecting the product or service that a customer is selecting. This is important, because from the customer's perspective it is that company that needs to survive in a form that maintains the requisite operational characteristics to meet their fairly held requirements. And it is thus at this level that the selection needs of the customers' advisers must be met. This contrasts to credit rating, which will be undertaken at group or parent company level where investment or debt placement etc. is made.

Further details on how analysis is undertaken is provided at the end of this report and may also be obtained from AKG.



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Rating & Assessment Commentary



RATINGS

Overall Financial Strength



Supporting Ratings

	Service	Image & Strategy	Business Performance
Seven Investment Management LLP	★★★★	★★★★	★★★★



SUMMARY

- Seven Investment Management (7IM) continues to provide a wide range of investment services to meet intermediary and client demands, with growing platform and DFM propositions
- The financial performance of Seven Investment Management LLP (7IMLLP) has been relatively stable, and its solvency and liquidity measures are considered satisfactory
- Positioning is now for a further phase of growth following on from what might be seen as an initial period of successful establishment and market recognition
- Asset growth has continued across the whole 7IM business, with AuM increasing to £21.0bn at the end of 2021
- Caledonia Investments plc (Caledonia) continues to represent a stable form of ownership with long term investment and development characteristics, remaining supportive of 7IM's growth plans including providing £16.5m of 'follow-on' investment in 2018 to support the acquisition of Tcam Asset Management Group Ltd (Tcam) by 7IM Holdings Ltd (7IMH)
- Ownership by Caledonia has provided opportunity for the remaining founders to step back from the business and the final one of the original seven stepped back during 2020
- In October 2020, 7IM announced the acquisition of Partners Wealth Management LLP (PWM), with around £2.2bn of AuMA, and Find a Wealth Manager Ltd. Further capital of £25.4m was provided by Caledonia in 2020 to support these acquisitions
- New chief executive appointed in April 2019 redefined the business' focus areas for future growth, so that it can continue to develop and grow under Caledonia ownership, and propositional changes have taken place in the last few years linked to retirement income and low cost funds
- A culture review was undertaken, overseen by an external consultant, which drew significant staff engagement and support and led to positive changes being made
- ESG (Environmental, Social and Governance) principles are now adopted as a mainstream consideration within 7IM's operation as an investment manager and the business is also demonstrating concerted focus on its own (corporate) ESG position and impacts
- COVID-19 response was robust with minimal disruption, risks well managed and service maintained. Flexible hybrid working patterns are now standard
- Caledonia had net assets of £2.8bn as at 31 March 2022, and reported positive returns from each part of its portfolio



COMMENTARY

Financial Strength Ratings

Seven Investment Management LLP

7IMLLP considered its performance in 2021 pleasing, in light of the continued challenging economic environment during the year. Revenue increased by 8% to £71.0m, and the LLP delivered a profit before Members' remuneration of £19.3m, against £18.0m in the prior year. AuM, the main driver of profitability, has continued to grow year on year.

Cost of sales and administrative expenses increased in the year. Staff numbers increased, which fed through to staff costs, with the business actively hiring in line with its growth targets. While the operating profit margin had been well maintained in the preceding years, 2020 saw a dip in margins, with a further small decrease in 2021.

7IM's ultimate parent Caledonia Investments plc (Caledonia) continues to view its investment strategy as one to support the longer term growth ambitions of the 7IM team. Caledonia is a significant financial company with £2.8bn of net assets as at 31 March 2022. Caledonia has a long-term investment horizon - often over ten years - and a predominantly 'value-building' style of investing, with follow up capital commonly provided. In the financial year to December 2020, Caledonia provided further capital to 7IMH, with ordinary shares totalling £25.4m issued. No additional capital was required in 2021.

Regulatory capital requirements for 7IM are reported on a consolidated basis, with the latest figures based on the position as at 31 December 2021. The current reporting group includes the three regulated entities 7IMLLP, PWM and 7IM Investment and Retirement Solutions Ltd (7IMIRS) with the available capital resources reflecting the capital held by parent 7IMH. A CRR coverage ratio of 179% was reported on this basis.

Service Rating

A combination of a simple fee structure and the development of app based reporting continues to prove positive for maintaining high service levels, with 7IM awarded numerous service-related awards in recent years - see Benchmarks section.

Service is seen by the business as a key part of enabling scale growth - the next phase of its development. This is also in keeping with the business culture of being innovative and looking to lead the market. There continues to be investment in systems to enhance functionality, ensuring these are scalable for a growing business.

As part of driving ongoing service excellence and in delivering a positive response to COVID-19, 7IM points to support for staff and their working environment. This has recently including upskilling of managers in more soft skills to monitor and coach / support staff and thus maintain the business through the requirement for new ways of working remotely. 2021 saw the roll out of a cultural enhancement programme.

Image & Strategy Rating

Across the 7IM business, the development of new distribution channels (including the acquisitions of Tcam, bringing a presence in Edinburgh / Scotland, London-based PWM, and being added to the Openwork network) and enhancements to proposition and services (such as the acquisition of Find a Wealth Manager Ltd, the launch of the retirement planning service for decumulation, and low cost Pathway Model Portfolios and Pathbuilder funds) appear well supported by Caledonia, demonstrating a stable form of ownership with long term investment and development characteristics. This includes support for a strategy of delivering a spectrum of investment solutions to match a range of intermediary requirements.

7IM received approval for and opened a Jersey branch in St Helier in 2018 as part of a considered expansion into the wider offshore marketplace, with its intention to offer a 'leading offshore platform, with custody arrangements in Jersey'. The branch, however, shut in 2022, while 7IM still operates as a platform in Jersey. In the UK 7IM launched its own SIPP in May 2018, offering a more integrated approach for those advisers seeking it. It is available on the 7IM platform along with other SIPPs as the open architecture approach has been maintained.

Since June 2019, the board have overseen an overarching strategic plan to ensure the future direction of the business makes the best use of its strengths and capabilities, and it identified four areas of focus (see Market Positioning later).

The appointment of a new chief executive was undertaken to provide the business with experience and an external perspective that would serve to drive further growth and "safeguard the long term interests of all the group's stakeholders" and there does appear to be renewed enthusiasm and appetite for growth seen within the business during the last 18 months, along the refreshed principles and new focused strategy. Various other senior management changes have taken place since, aligned to the next phase of the business' development.

Recent proposition enhancements include the launch of the 'Secure Lifetime Income' which proposition in partnership with Just. This will guarantee an income for life for clients holding a 7IM SIPP.

Business Performance Rating

Performance for 7IMLLP in 2021 was broadly positive, with AuM (across platform and DFM) up by 20.2% to £19.2bn, and revenue increases across all business lines, particularly in the platform business. Profit before members' remuneration (and tax) increased by 7.3%.

Total costs (excluding members remuneration charged as an expense) increased by 9% to £51.7m, with an increase in staff costs (up by 8%) as staff numbers continued to rise to support business operations (average monthly staff numbers during the year were up from 336 to 360 in 2021). The operating margin dipped slightly, while the profit after member's remuneration margin increased minimally, with the margins at 27% and 16% respectively [2020: 28% and 15%].

In 2020 7IMH had introduced an additional £2m of member capital into the LLP, taking its total capital recognised to £15.6m. There was no change in 2021.

7IM adopted a new strategic focus in mid 2019 and worked closely with key intermediary clients in developing this, reflecting the importance of this distribution route, and new propositions launched or in development hope to capitalise on this closer relationship with clients and the market.

7IM moved to operate under its business continuity plans in March 2020 as a response to the pandemic. Since the summer of 2021, the LLP's staff have been operating under a hybrid working approach with flexibility to work from either the office or remotely, and have been able to fulfil their roles as normal. 7IM states that the LLP has robustly and resilient business continuity plans in place to ensure that all its critical functions remain fully operational.

The group continues to develop; the acquisition of Tcam in 2018 added £1.1bn of AuM, and the private client business segment grew strongly in revenue terms during 2019 and 2020. The acquisition of PWM in 2020 added £2.2bn of AuM and the integration was reported to have gone well, with performance ahead of expectations. Growth in the existing business plus the recruitment of 7 new advisors in the year enabled PWM LLP to produce record annual profits, and AuM increased by 17% to £2.8bn.

Parent Caledonia's objective as an investment trust is to grow net assets and dividends over the long term, whilst managing risk to avoid permanent loss of capital. As such its performance is reported across a range of factors, short term and longterm. As at 31 March 2022 the group had net assets / equity of £2.8bn [2021: £2.2bn] and reported positive returns from each part of its portfolio. Profitability increased on the prior year, with a profit before tax of £592.0m [2021: £455.8m]. Caledonia made new or follow-on investments of £227m during the year alongside divestments totalling £603m, with the disposals of Deep Sea Electronics and BioAgilytix in the year. This contributed to a marked increase in cash, which stood at £341.1m at the end of March 2022 [2021: £14.2m]. The group had drawn borrowings of £nil at the year end [2021: £15m] and had a further £250m [2021: £235m] of undrawn committed bank facilities.

While there have been press reports of the potential sale of 7IM by Caledonia, no deal has been announced and there is no indication that any future ownership change will affect the operation of 7IM.

Group & Parental Context



BACKGROUND

In September 2015, Caledonia, via its subsidiary Caledonia Thames Acquisitions Ltd (CTAL), acquired the shares that Allied Zurich Holdings Ltd (AZH) and Aegon UK plc (Aegon UK) held in 7IMH. 7IMH is the Corporate Member of 7IMLLP and has 95% of the voting rights in 7IMLLP (with other individual members having 5% voting rights); Caledonia is thus considered to be the ultimate controlling entity of 7IMLLP.

Various elements of the corporate structure holding 7IM are now held via offshore (Jersey) companies with prior UK intermediate holding companies, including CTAL, dissolved in April 2019.

Tcam Asset Management Group Ltd (Tcam) was acquired by 7IMH in 2018, with the joint-CEOs of Tcam becoming partners in 7IMLLP as well as joining the management committee of 7IM (although one has since left the business). The main business of the Tcam group was carried out by its subsidiary, 7IM Financial Solutions Ltd (7IMFS - previously named Tcam Asset Management Ltd). The discretionary client business of 7IMFS was transferred to 7IMLLP at the end of 2018, and the remaining financial planning advice service was transferred to 7IMIRS in May 2019. During the year ended 31 December 2020 Tcam and underlying subsidiaries including 7IMFS were dissolved, and the remaining £2.5m investment balance in Tcam was fully impaired.

7IMH acquired Partners Wealth Management LLP (PWM), and purchased the entire shareholding of Find A Wealth Manager Ltd (FWM) on 16 October 2020. PWM was acquired for an initial consideration of £19.9m, with further deferred consideration to be paid over the next three years. 7IMH owns 95% of voting rights of PWM, with 5% retained by its members. Consideration for FWM was £3.0m.

PWM, with £2.2bn of AuM at the time of acquisition, will retain its own brand and continues to operate as an independent company, albeit benefiting from efficiencies of scale and back office integration with 7IM.

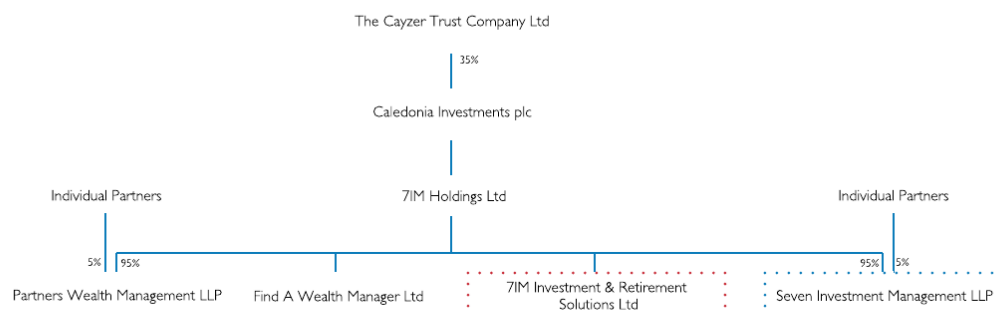
The ownership of the subsidiary 7IMIRS was transferred from 7IMLLP to 7IMH on 19 October 2020 for £1.3m.

Caledonia is listed on the London Stock Exchange and is a UK based self-managed investment trust company, with net assets / equity of £2.8bn as at March 2022. Caledonia has been an investment company since 1987 and an investment trust company since 2003. It is part-owned (c. 48.9% in total) by various members of the Cayzer family (including the Cayzer Trust Company Ltd with around 35%) whose ancestor established the shipping business in 1878, from which Caledonia evolved.

The Caledonia investment trust business is managed through three pools of capital: Quoted (split further into Income strategy and Capital strategy), Private Capital and Funds. Caledonia reports 7IM within its Private Capital pool where its value of £173.7m at the financial year end 31 March 2022 represented 22.2% of the closing value of the pool (£781.7m). Caledonia's total return from 7IM in financial year 2022 was 40.5% [2021: 29.4%], with the successful integration of the Partners Wealth Management business being a major contributor to performance, alongside growth in 7IM's platform business. Assets under management continue to grow strongly through a mix of positive investment performance and net new fund inflows. Other investments in this pool include Cobehold, a Belgium-based investment company which it has held since 2004; Liberation Group (Jersey-based pub, restaurants and brewery business); and Stonehage Fleming, a large EMEA multi family office based in Guernsey. The Private Capital pool generated £26.9m of income for Caledonia, and produced a net gain of £295.1m over the year.



GROUP STRUCTURE (SIMPLIFIED)



Key:

- • • • • Subject of this Assessment
- • • • • Subject of another AKG Assessment

Company Analysis: Seven Investment Management LLP



BASIC INFORMATION

Ownership & Control

Caledonia Investments plc is the ultimate controlling entity of 7IMH, which is the corporate member of SIMLLP with a 95% voting interest

Year Established

Business was established in 2002, but 7IMLLP was established in 2012 to take over the business of Seven Investment Management Ltd

Country of Registration

UK

Head Office

55 Bishopsgate, London, EC2N 3AS

Contact

www.7im.co.uk

Key Personnel

Role	Name
Chairman 7IMLLP	A Grace
Chief Executive Officer	D M Proctor
Chief Financial Officer	D R Walker
Chief Risk Officer	J Sivananthan
Chief Operations Officer	L Paradine
Chief Client Officer	C Phillips
Chief Investment Officer	M Surguy
Chief People Officer	K Hughes
Chief Technology Officer	W Thornton-Reid
Managing Director, Intermediary	V Kenny
Managing Director, Private Clients	C Rowe
Head of Portfolio Management	U Ketelsen
Head of Strategy and Transformation	A Baker
Interim Head of Operational Risk	K Ottley

Company Background

7IMLLP provides the 7IM platform technology, administration and support in-house, also acting as the ACD (Authorised Corporate Director) of the 7IM Investment Funds, 7IM Specialist Funds, 7IM Opportunity Funds and 7IM Funds ICVC. The 7IM (Dublin) Funds plc's six sub funds were merged with the UK sub fund equivalents on 20 November 2020, having been managed during 2020 by Link Fund Manager Solutions (Ireland) Limited, with 7IMLLP acting as Investment Manager to the company and each sub fund. The Dublin-based funds were closed in 2020 as a result of Brexit.

7IM was founded in 2002 by seven professionals who set up an investment management business, initially operating as a division of Killik & Co under the trading names of 7IM and 7 Investment Management. The 7IM platform was launched by the business in 2005. In 2007, AZH and Aegon UK jointly backed a new company Seven Investment Management Ltd

(7IMLtd) which, along with 7IM management, bought out the business from Killik & Co. Initially, AZH held 49% and Aegon UK 15%.

On 1 March 2013 the primary business of 7IMLtd was transferred to newly formed 7IMLLP. 7IMLtd changed its name to 7IMH, and became the Corporate Member and immediate controlling party of the LLP.

A new subsidiary of the LLP, 7IMIRS, was established in 2018 to support the provision of a SIPP product. This business was sold to 7IMH in 2020.

During 2018, the LLP opened a branch in Jersey to provide services to Jersey-based clients: this was closed in 2022, with Evelyn Partners acquiring the trust and private client book of Seven Investment Management (7IM) Jersey.

As at October 2022, the 7IM platform held £13.8bn of AuM, for 37,439 clients of 2,039 advisers. There were over 440 staff employed within the wider 7IM operation at this time and AuM of £19.4bn.



OPERATIONS

Governance System and Structure

The governance structure for 7IM is headed by the board, and supported by a number of committees. The Executive Committee (ExCo) of 7IMLLP retains the key responsibility for setting and monitoring financial risk. The UK Group has an Audit, Risk and Compliance Committee: (ARCC). The Board has delegated the responsibility of monitoring financial risk management to the ARCC. The LLP also has an Investment Risk Committee and a Business Risk & Compliance Committee. The responsibilities of the ARCC include oversight of internal audit, finance, compliance, external audit, control processes and systems. The ARCC has three members including two non-executives and the LLP's Chairman.

An ICAAP is produced which ExCo formally reviews on an annual basis. From 2022, this will be replaced by the Internal Capital Adequacy and Risk Assessment (ICARA) process. A Pillar 3 Disclosure covering risk management objectives and policies, and regulatory capital requirements / capital resources information is produced and available publicly.

7IM has continued to strengthen its compliance function, with a new Head of Compliance appointed in March 2020, with responsibility as Money Laundering Reporting Officer (MLRO) part of this function.

Risk Management

The ExCo has management and oversight responsibility for risk management and meets quarterly, or more frequently as required. The ExCo decides 7IM's risk appetite and ensures 7IM has implemented an effective ongoing process to identify risks, measure the potential impact and ensure the risks are actively managed.

7IM has identified that it is exposed to, and therefore is required to manage risks relating to: market, liquidity, operational, credit, investment performance and regulatory risks. In addition, it identifies key personnel risk, in respect of the senior principals / management committee of the business, which it has mitigated by hiring a second tier of management in all areas.

Business Continuity Plans (BCP) are maintained within each team within an overarching framework, and have been tested on a regular (six-monthly) basis. In March 2020, the LLP started operating under its BCP plans as a result of the pandemic.

The Investment Risk Committee includes the Chief Executive, Chief Financial Officer and Head of Operations. This meets formally on a quarterly basis, but its terms of reference require approval of certain actions by circulation or by ad-hoc meetings. 7IMLLP concentrates on strategic asset allocation (SAA) as the major building block for its investment process. It believes that SAA - the spread of different asset types in a portfolio - is responsible for around 91% of the variation in returns for a portfolio over the long term.

Overall the business has increasingly adopted an approach which looks to link risk management more closely to investment processes at all points.

A new Head of Operational Risk was appointed in September 2021, and the company appointed its first Chief Risk Officer in February 2022.

The governance structure has been refreshed over the last year, with policies and procedures all reviewed and with some further key hires to strengthen the team and better allocate responsibilities. Two new tools have been added, to support staff compliance and a core risk tool. The business is now more data led, with better management information and a combined holistic view.

Administration

7IM funds can be bought online through the 7IM platform, online through numerous other platform providers, or direct from 7IM's Fund Servicing Centre. A large staff team exists to service all customers with an average monthly number of staff of 360. The largest teams were the Intermediary Team, which includes people working on the 7IM platform and those supporting 7IM's Relationship management and Business Development efforts; the Operations and Officer Services team and the combined Technology teams. The Private Client Team, consisting of London, Edinburgh and financial planning, had a headcount of 52.

The business expanded its retirement planning options and became a pension provider by launching its own SIPP in 2018, with administration for the new 7IM SIPP provided by Imago.

Pershing Securities Ltd (PSL) acts as custodian for some clients and in this role is responsible for handling client money, custody of assets and settlement of transactions. PSL's arrangement with 7IM is as a 'Model B' provider, where the 7IM client contracts directly with PSL for custody services rather than the custody being provided by 7IM outsourcing to PSL. Pershing (Channel Islands) Ltd (PCI) provides the services for assets held in Jersey. The Pershing group provides a broad range of financial business solutions to investment banks, broker-dealers, wealth managers, financial planners and advisers, and provides sophisticated front-end technology and flexible middle office capabilities with execution, settlement and custody services. PSL and PCI are ultimately owned by the Bank of New York Mellon Corporation (BNY Mellon), a very significant US-based global financial services company with US\$43trn AuA.

The business continues to carry out significant vendor and supplier reviews and generally to upgrade its security systems and processes with input from executive and non-executive directors. This includes applying the standards worked to by 7IM to the newly acquired companies.

IT systems work has included an operational efficiency stream looking at how processes can be simplified, with investment in underlying systems, such as start of day, and projects including easier account opening, improvements around fee calculation and management, and multi-currency reporting. Other IT work streams include platform enhancements and wider ongoing development, including upgrades to areas such as its .NET infrastructure.

In May 2021, the LLP delivered the Xplan practice management system for its Private Client business. This is intended to deliver improved efficiency and digital engagement.

The LLP began operating under its business continuity plans in March 2020, and reported these are robust and resilient, with all its critical functions remaining fully operational. All staff worked remotely in March 2020 and were able to fulfil their roles as normal, with sufficient staff cover to ensure that all tasks continue to be performed. This extended to the Investment Management and Investment Risk teams who monitor the performance of the funds and investment portfolios. The Investment Management and Dealing teams were equipped with all the necessary systems to ensure they could continue to run and manage portfolios remotely.

Benchmarks

7IM has won numerous awards and received accolades in recent years. In 2022, it was named Best Platform for Advisers (below £25bn AUA) in the Professional Adviser Awards. In 2021 it achieved a Gold Service Rating for the 7IM Platform; and 5 Diamond rating for the 7IM MPS, as well as External Learning Solution of the year alongside its partner ABSTRACT in the Learning Awards 2021.

In November 2020 7IM increased from four star to five star rating in the Financial Adviser Service Awards and was the highest rated company in the Investment sector of the awards, although it has since fallen back in 2021 to 4 and 3 stars respectively for Investment and Platform sectors. It was also awarded Defaqto Gold for the platform service in 2020 and won Best Platform for Discretionary Management and Best Wealth Management Platform at the UK Platform Awards.

Prior to this, in 2019 it was awarded:

- Leading Retirement Proposition at the UK Platform Awards; and was Highly Commended in the Leading Platform for Discretionary Management category
- Best Investment Service at the Investment Life & Pensions Moneyfacts Awards
- 5 Star Defaqto ratings for the 7IM AAP Fund Range, 7IM DFM Managed Portfolio Service on Platform, 7IM DFM Managed Portfolio Service Direct, 7IM DFM Bespoke, and 5 Star Diamond Defaqto rating for the 7IM UK Equity Value Fund

Outsourcing

Northern Trust Corporation (Northern Trust) acts as depositary, custodian and administrator for 7IM funds, via various UK and Ireland based subsidiaries. Northern Trust is headquartered in Chicago, Illinois, USA. From a Chicago-based bank founded in 1889, it now has more than 22 international locations and 21,000 employees globally. As at September 2022, Northern Trust had US\$12.8trn in assets under custody / administration and US\$1.2trn in assets under management.

Dunstan Thomas supported 7IM as external partner in building its new 7IM SIPP proposition, and all administrative functionality is provided by the Imago Administration system. 7IM also outsources to Financial Software Ltd and Morningstar.



STRATEGY

Market Positioning

Services run across several propositions. 7IM is engaged in the provision of discretionary investment management services to individual clients; a range of multi-manager 'specialist funds'; and a range of model portfolios. It also offers the 7IM adviser platform, on an open architecture basis.

The historically HNWI nature of the 7IM offering across platform and investment management means it has been focused on a relatively small segment of the B2B market, although this is growing and 7IM appeals more broadly to the 'core' market now. It currently offers its services via financial planners and professional advisers/intermediaries, or dealing directly with clients, or executing on behalf of clients. Since 2019, 7IM has provided financial planning advice and provides recommendations to clients on specific investment planning via 7IMIRS.

7IM received approval and opened a Jersey branch in St Helier in 2018 as part of a considered expansion into the wider offshore marketplace, with its intention to offer a 'leading offshore platform, with custody arrangements in Jersey'. 7IM considers its range and operability of multi-currency options provided sets it apart from other offshore platforms. In 2022, 7IM closed its office in Jersey, but will continue to provide services to its platform clients there.

In June 2022, it was announced that 7IM had been added to the Openwork platform proposition following a full market review. The 7IM Platform will be rolled out to The Openwork Partnership's advisers throughout the second half of 2022 in a structured process. It will join the platform panel alongside the M&G Wealth, and Advance by Embark platforms.

In the UK 7IM launched its own SIPP in May 2018, offering a more integrated approach for those advisers seeking it, but other SIPPs remain available on the platform as the open architecture approach was maintained.

The Tcam acquisition in 2018 introduced 'complementary strengths which will produce an improved investment service' for 7IM customers, both intermediary and direct. It also brought 7IM a presence in Edinburgh / Scotland.

The business appointed an external consultant in 2019 to undertake a review of the culture at 7IM. A significant staff survey was conducted and received a high response rate, and positive action was taken off the back of this in terms of the working environment. Moreover, staff and members were asked to input into the "vision, values and purpose" of 7IM as it moved into its next stage of development as an organisation. Over 200 staff attended a series of workshops to shape some of this future vision about 7IM's offering.

This focus on culture is ongoing, including ongoing attention on diversity and inclusion, together wider social consideration by the business. Recently 'Culture Hubs' have been established, with open invitation to all staff, as part of widespread involvement in how this cultural change shapes 7IM for the future. A cultural enhancement programme has been underway

in the last year, and staff surveys in January and July 2022 showed good levels of understanding of the culture of 7IM and the fit of the role within the business.

The board has overseen an overarching strategic plan since June 2019 to ensure the future direction of the business makes the best use of its strengths and capabilities. Four areas of focus were identified, stated as:

- A return to investment market consistency
- Rebuilding and expanding open market distribution
- Future proofing platform competitiveness
- Growing a UK private client financial planning and investment management business

Proposition

7IM offers investment management services to individual clients and provides a range of OEICs to financial intermediaries and direct clients. It provides a range of investments within a wrap platform service environment to financial intermediaries if required.

7IM provides multi manager funds and asset allocated passive funds (AAPs), along with a other specific purpose funds, such as the 7IM Personal Injury Fund. The fund sets offer a range to suit different investor requirements and objectives, and 7IM continues to bring new products to market. During 2020, 7IM launched Pathbuilder funds, which are the fund equivalents of the 'Pathway' model portfolios. This consisted of three new low cost funds designed to provide advisers with a passive and low-cost option to complement their existing multi-asset strategies with a deeper level of diversification. The Pathbuilder 4 Fund was launched in December 2021, to complete the fund range. These funds are available on both the 7IM platform and will be made available on other platforms.

7IM's Model Portfolio Service (MPS) offers a range of risk rated model portfolios for advisers looking to allocate client funds to a range of risk graded investment strategies. 7IM's strategic asset allocation provides the anchor for the vast majority of the portfolio. Each portfolio consists of 10-25 underlying funds. The portfolios are designed to provide a range of consistent risk profiles based on the shape of their strategic asset allocation to different risk assets. The model portfolios are available on numerous platforms in the intermediary space, in addition to the 7IM platform.

In early 2018, the LLP launched a range of 5 'Active' models and in November 2018 a range of six 'Select Model Portfolios', these being risk rated model portfolios 'leveraging the high conviction strategy historically favoured by TCAM', it stated. In September 2019, against a background of lower expected returns following a prolonged bull market, it launched '7IM Pathway', a 'low cost range of volatility managed, diversified portfolios made up of passives'.

7IM continues to expand its adviser offering. Enhancements continued to be seen in its full service Discretionary Investment Management service, where a 7IM relationship manager works alongside the financial intermediary to deliver a bespoke service to the end client built around 7IM risk profiled strategies enhanced with specialist portfolios as required to reflect the required client strategy, with access to 7IM's series of active and passive strategies, an unconstrained approach and an income approach. Complementary investment vehicles run by other asset managers can be identified; portfolios can be managed within or outside tax wrappers, onshore or offshore; and the investment strategies can be implemented with unithised funds or through segregated model portfolios.

The 7IM platform itself is set up on an open architecture basis, and allows investment in offshore bonds, ISAs and pensions products from numerous providers. 7IM thus offers a wide range of services and flexible routes to investing, depending ultimately on the client and/or financial intermediary's requirements.

The website was relaunched in 2017 to improve the provision of information to clients and intermediaries. One specific element of the service is the 7IMagine app which allows investors and clients to see more clearly what is happening to money invested. This continues to see development and now includes a cashflow modelling tool 'MyFuture'. Further significant enhancement and indeed a wider use of app based support solutions for clients is anticipated, with internal resource allocated to this underlining its importance.

Further developments are ongoing, with plans for example, including the introduction of Digital Client Reviews (reporting) in train for 2023.

In 2018, 7IM launched its retirement planning service, focussed on assisting advisers with their decumulation requirements for clients at or near retirement. As previously stated, 7IM is now also a pension provider after launching its own SIPP in

2018, which it built in partnership with Dunstan Thomas, underpinned by the administrative functionality of the Imago Administration system.

7IM expanded its retirement proposition for financial advisers in May 2022, with the launch of a 'Secure Lifetime Income' (SLI) product, in partnership with Just. The SLI sits within the 7IM SIPP, accessed via the 7IM platform, and enables advisers to offer a guaranteed income producing asset alongside existing drawdown arrangements and other investment strategies for their clients.

ESG principles are now a fundamental and mainstream consideration within 7IM's operation as an investment manager and in 2019 7IM signed up to the UN PRI (Principles for Responsible Investment). More attention in this area, including external research and benchmarking exercises, is underway. 7IM produced its first full PRI report in March 2021. As of March 2022, 7IM is also a signatory of the Financial Reporting Council's UK Stewardship Code 2020. This sets high standards for asset managers and holds them accountable to 12 principles covering a range of stewardship activities and outcomes.

In February 2021, 7IM launched its Responsible Choice Model Portfolios, a range of five differing risk portfolios covering the full responsible investment spectrum. The LLP considers that its carbon emissions are of strategic importance to the LLP, and has a number of initiatives on-going to reduce emissions, for example with a change to air travel policies, and offsetting, where it partners with the World Land Trust.



KEY COMPANY FINANCIAL DATA

Last 3 reporting periods up to 31 December 2021

Capital Resources Disclosures

	Dec 19 £m	Dec 20 £m	Dec 21 £m
Available capital resources	12.6	21.6	23.4
Capital resources requirement (CRR)	7.9	13.1	13.1
Excess capital resources	4.7	8.5	10.3
CRR coverage ratio (%)	159	165	179

7IMLLP is regulated by the FCA and forms part of a 7IM reporting group, which now includes 7IMIRS and PWM. A group Pillar 3 Disclosure was issued for December 2020 on this basis, with capital resources reflecting that of the UK holding group 7IMH. Share capital of £75.9m, plus Members' capital contributions and reserves, was adjusted through the deduction of intangible assets down to £21.6m, all Tier 1 capital. The Fixed Overhead Requirement (FOR) approach for regulatory capital was taken, and calculated at £13.1m, so on this basis, as shown in the table above, coverage was reported at 165%. On a Pillar 2 basis, the capital resources requirement increased to total £15.2m, with a coverage of 142% at the end of 2020 [2019: 115%]. For 2021, while a Pillar 3 disclosure was not yet available at the time of writing this report, capital of £23.4m was reported against a requirement of £13.1m, giving coverage of 179%.

At the 2021 year end, the LLP had capital resources after deductions of £14.8m against a capital requirement of £9.9m [2020: £10.3m].

Statement of Financial Position

	Dec 19 £m	Dec 20 £m	Dec 21 £m
Assets	52.0	56.7	56.3
Current liabilities	(26.9)	(32.1)	(29.3)
Long-term liabilities	(9.2)	(6.7)	(9.0)
Net assets	15.9	17.9	18.0

Statement of Changes in Members' Equity

	Dec 19 £m	Dec 20 £m	Dec 21 £m
Members' equity at start of period	16.0	15.9	17.9
Movement due to:			
Members capital classed as equity	0.0	2.0	0.1
Retained earnings	0.0	0.0	0.0
Other	0.0	0.0	0.0
Members' equity at end of period	15.9	17.9	18.0

Total assets of £56.3m included increased cash and cash equivalents of £17.9m [2020: £14.0m], and settlement debtors of £13.8m [£23.5m], the latter related to amounts due to 7IM funds for the sale of units in the 7IM OEICS. There was a corresponding liability for the repurchase of units, £13.8m [£23.5m]; as ACD of the funds, the LLP includes these balances in its balance sheet. Members' capital (classed as equity) stood at £18.0m on 31 December 2021 [2020: £17.9m], with £280k of new capital introduced and £185k of capital repaid to members during the year. The Corporate Member had introduced an additional £2m of member capital into the LLP on 18 September 2020, which brought its total member capital to £15.6m.

In addition to the 'equity' above, the total interest that Members have in the business includes allocated profits that have not yet paid to them and usually due within one year subject to the cash requirements of the business. The latter element is categorised as 'Loans and other debts due to/from members', and increased from £3.9m to £7.6m in 2021. This arrangement is largely in place to ensure that personal members have funds available to meet their own personal tax liabilities arising from receiving profit share from the LLP.

Total members' interests as at December 2021 were £25.6m [2020: £21.9m], of which £18.0m [£17.9m] was classed as equity as described above. Drawings of £15.6m were taken in the year [2020: £21.3m] as well as £8.1m [£8.0m] of remuneration paid as an expense directly through the P&L.

Income Statement

	Dec 19 £m	Dec 20 £m	Dec 21 £m
Revenue	70.6	65.6	71.0
Other operating income	0.0	0.1	0.2
Operating expenses	(49.4)	(47.5)	(51.7)
Operating profit (loss)	21.2	18.2	19.5
Other gains (losses)	(0.2)	(0.2)	(0.2)
Profit (loss) before taxation and members' remuneration	21.0	18.0	19.3
Taxation	0.0	0.0	0.0
Profit (loss) after taxation	21.0	18.0	19.3
Other comprehensive income	0.0	0.0	0.0
Members' remuneration charged as an expense	(8.8)	(8.0)	(8.1)
Retained profit (loss)	12.2	10.0	11.2

Financial Ratios

	Dec 19 %	Dec 20 %	Dec 21 %
Operating margin	30	28	27
Pre-tax profit margin	17	15	16
Employee costs as a % of revenue	26	29	28

The Members consider the profitability of the business as the main KPI, with the main driver of profitability being AuM growth. Revenue in 2021 increased by 8.2% to £71.0m [2020: increased by 7.1% to £65.6m], with the increase largely driven by revenue from the platform line, which increased by 24.4% (£4.6m). There were smaller increases of between 1% and 2% across all the other revenue lines. The platform revenue of £23.2m represented the largest business line for the year at 32.7% of the total, followed by funds and models (26.0%), private clients (23.5%) and discretionary management income line (17.8%).

Total costs (excluding members remuneration charged as an expense) increased by 9.0%, with cost of sales up by £2.5m (16.8%) and administrative expenses up by £1.8m (5.4%). Cost of sales comprises direct costs charged to the LLP by outsourced service providers. The majority of these costs include custodian charges for client assets and fund administrative charges for the 7IM Investment Funds. Staff costs, which represented 38% of total costs, increased by £0.9m (4.7%), with a 7% increase in average monthly staff numbers to 360. During the year the LLP leased four offices. These operating lease commitments run until: London - 2023; Ocean Point, Edinburgh - 2023; Princes Exchange, Edinburgh - 2025, with Jersey having an annual renewable lease. The Jersey office has since closed.

The operating margin decreased to 27% [2020: 30%] and the pre-tax profit margin also reduced (the ratio in the table is calculated after 'members remuneration charged as an expense').

The average monthly number of members during the year was 65 [2020: 66] including the corporate member 7IMH. Members remuneration was charged as an expense and totalled £8.1m in 2021 [2020: £8.0m]. Deduction of this left £11.2m profit available for discretionary division among Members [2020: £10.0m]. It should be noted that the LLP is not required to pay corporation tax, and that tax on the profits is the personal liability of each of the members. To mitigate any risk of individuals not being able to discharge their personal tax liabilities, the LLP retains an amount equal to the estimated income tax, National Insurance and any other taxes that might become due for each member, and this is held as a loan from the member which is paid to them when the tax falls due.

The profit share allocated to the corporate member was £8.6m [2020: £8.2m].

SIMLLP represents the predominant contributor to 7IMH's consolidated profits. 7IMH profit after tax was £6.2m [2020: £3.7m] and total dividends of £8.6m [£3.8m] were paid to its immediate parent Caledonia Thames Acquisition (Jersey) Ltd.

Statement of Cash Flows

	Dec 19 £m	Dec 20 £m	Dec 21 £m
Net cash generated from operating activities	23.3	2.2	6.4
Net cash used in investing activities	(0.3)	(2.0)	(0.9)
Net cash used in financing activities	(23.3)	0.1	(1.5)
Net increase (decrease) in cash and cash equivalents	(0.3)	0.4	4.0
Cash and cash equivalents at end of period	13.6	14.0	17.9

Assets under Management (AuM)

	Dec 19 £bn	Dec 20 £bn	Dec 21 £bn
Assets at start of period	13.3	14.6	16.0
Inflows	2.1	2.6	4.0
Outflows	(2.3)	(2.0)	(2.2)
Net market and other movement	1.4	0.8	1.4
Assets at end of period	14.6	16.0	19.2
Growth rate (%)	9	10	20
Net inflows as % of opening AuM	(1)	4	11

7IMLLP generated £22.0m of cash from operating activities in 2021 [2020: £21.1m], from which Members' drawings of £15.6m [£18.8m] were made, leaving a net cash inflow from operating activities of £6.4m [£2.2m]. Net expenditure on investment activities was £0.9m (tangible and intangible). Within financing cashflows, Member contributions of £0.3m were offset by lease liabilities payments for the period of £1.6m, and repayments of Members contributions of £0.2m. There was an overall cash inflow of £4.0m [2020: £0.4m]. Balance sheet cash increased accordingly, from £14.0m to £17.9m at the end of December 2021.

[Note: The cashflow above follows the presentation in the R&A. From 2020, 7IMLLP have netted off Members' drawings from operating activities, rather than from financing activities as previously]

The members consider that the growth in its assets under management (AuM) is the third key KPI for the LLP. AuM grew further in 2021, up by 20.2% to £19.2bn, reflecting continued flows of new assets into the business and onto the platform. As at the end of December 2021 AuM was split between: Discretionary (direct business, including Tcam book) £2.28bn; Discretionary (intermediary) £1.80bn; Platform (including 7IM Funds and Model Portfolios in 7IM custody) £10.83bn; and Funds and Model Portfolios (held on third party platforms) £4.27bn.

Across the business, Seven Investment Management saw a 15% increase in its AuM in 2021. The group reported that AuM increased to £21.0bn at the end of 2021, up from £18.3bn at the end of 2020.

Guide



INTRODUCTION

For over 30 years AKG has particularly focused on the financial strength requirements of financial advisers, who when acting on behalf of their clients, need to ascertain a company's ability to deliver sustained provision.

From this customer perspective, the financial strength of companies needs to be focused at an operational level, specifically on the company that is effecting the product or service that a customer is selecting. This is important, because from the customer's perspective it is that company (not some higher corporate entity) that needs to survive in a form that maintains the requisite operational characteristics to meet their fairly held requirements. And it is thus at this level that the selection needs of the customers' advisers must be met.

It is also important to understand the sector approach (comparative peer groups) that is adopted in financial strength assessment and rating process.

At AKG, this is again driven by the end customer perspective and the fact that assessment is designed solely for this purpose, i.e. as a component in helping customers' advisers to select between comparable companies competing to deliver relevant products or services.

AKG's focus and approach has remained consistent over the years since it commenced assessment and rating support for the market. However, coverage, format and presentation has rightly evolved over this period, in line with the needs and expectations of assessment and rating users in the market. And AKG considers further changes on a continual basis.

Further details including an explanation of what is included in the assessment reports and coverage can be found online at <https://www.akg.co.uk/information/reports/dfm>.

AKG's process for assessment and rating is to use a balanced scorecard of measures and comparative information, relevant to the companies contained within each peer group. This is gathered via Public Information only for non-participatory assessments and public information plus company interactions with companies for participatory assessments. Further details on AKG's process can be found at <https://www.akg.co.uk/information/reports>.

This includes further information on the different participatory and non-participatory basis and for companies wishing to learn more about participatory assessment AKG is pleased to outline this and welcomes contact.

This is a participatory assessment.



RATING DEFINITIONS

Overall Financial Strength Rating

The objective is to provide a simple indication of the general financial strength of a company from the perspective of those financial advisers who when acting on behalf of their clients need to ascertain a company's ability to deliver sustained operational provision of products or services.

The overall rating inherently reflects the mix of business within the company, since different types of customer or policyholder have different requirements and expectations, and the company may have particular strengths and weaknesses in respect of its key product or service areas. However, it also takes account of comparison across the sector in which it is assessed.

The rating takes into account those of the following criteria which are relevant (depending upon the company's mix of business in-force): capital and asset position, expense position and profitability, structure (and size) of funds within the company, parental strength (and likely attitude towards supporting the company), operational capability, management

strength and capability, strategic position and rationale, brand and image, typical fund performance achievements or product / service features, its operating environment and ability to withstand external forces.

Rating Scale	A	B+	B	B-	C	D	□
	Superior	Very Strong	Strong	Satisfactory	Weak	Very Weak	Not applicable

Service Rating

The objective is to assess the quality of the organisation's service to the intermediary market in respect of the brand concerned.

Criteria taken into account include: performance in surveys, awards and benchmarking exercises (external and internal), the organisation's philosophy, service charters, the extent of investments designed to improve service, and feedback from intermediaries.

Rating Scale	★★★★★	★★★★	★★★	★★	★	□
	Excellent	Very Good	Good	Adequate	Poor	Not Rated

Image & Strategy Rating

The objective is to assess the effectiveness of the means by which the organisation currently positions itself to distribute its products for the brand concerned and the plans it has to maintain and/or develop its position.

Criteria taken into account include: overall trends in the company's market share position, brand visibility and reputation, feedback from intermediaries and industry commentators, and AKG's view of the company's general strategy.

Rating Scale	★★★★★	★★★★	★★★	★★	★	□
	Excellent	Very Good	Good	Adequate	Poor	Not Rated

Business Performance Rating

This review is an assessment of how the company and the brand has fared against its peers, and how it is perceived externally. Effectively this is how it has performed recently in the market. Whilst it will include performance indicators from the most recent available statutory reporting (report and accounts and SFCRs in the case of insurance companies, for example) it will also draw on other recent key performance elements before and after such disclosure, up to the point at which the assessment is undertaken.

Criteria taken into account include: increase/decrease in market shares, expense containment, publicity good or bad, press or market commentary, regulatory fines, and competitive position.

Rating Scale	★★★★★	★★★★	★★★	★★	★	□
	Excellent	Very Good	Good	Adequate	Poor	Not Rated



ABOUT AKG

AKG is an independent organisation. Originally established as an actuarial consultancy AKG has, for over 30 years, specialised in the provision of assessment, ratings, information and market assistance to the financial services industry.

As the market has evolved over this period, the range of entities considered by AKG has expanded. Consequently, AKG has brought additional skill sets into its operations. This has meant the inclusion of accounting, corporate finance, IT and market intelligence experience, alongside actuarial resources, to deliver an expanded professional capability.

Today AKG's core purpose is in the provision of financial analysis and review services to support the wider financial services sector and its customers.

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This report is issued as at a certain date, and it remains AKG's current assessment with current ratings until it is superseded by a subsequently issued report or subsequently issued ratings (at which point the newly issued report or ratings should be used), or until AKG ceases to make such a report or ratings available.

The report contains assessment based on available information at the date as shown on the report's cover and in its page footer. This includes prior regulatory data which may have an earlier date associated with it, but the report also takes into account all relevant events and information, available to and considered by AKG, which have occurred prior to this stated cover and footer date. Events and information subsequent to this date are not covered within it, but AKG continually monitors and reviews such events and information and where individually or in aggregate such events or information give rise to rating revision an updated report under an updated date is issued as soon as possible.

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