

RETAIL CLIENTS EXECUTION POLICY

EXECUTION POLICY // APRIL 2019

INTRODUCTION

It is in the mutual interests of 7IM and its clients that we obtain the best possible result when executing transactions on your behalf or when transmitting orders to fulfil your instructions. We are required under the Rules of the Financial Conduct Authority (FCA) and Market in Financial Instruments Directive (MiFID II) to take all sufficient steps to provide Best Execution when doing so and also to provide you with a copy of the policy we adopt to achieve that objective.

This policy applies to all execution provided to retail clients through a range of services including Discretionary and Platform.

This policy should be read in conjunction with 7IM Terms and Conditions and our Conflict of Interest policy.

ORDER EXECUTION – OBTAINING THE BEST OVERALL RESULT

When executing orders on your behalf, 7IM will make every effort to obtain the best possible result for our clients taking into account the following Execution Factors:

- Price
- Costs
- Speed
- Likelihood of execution and settlement
- Size
- Current liquidity
- The characteristics of the client including the categorisation of the client as retail or professional
- The characteristics of the client order
- The characteristics of financial instruments that are the subject of that order
- The characteristics of the execution venues to which that order can be directed
- Nature
- Any other consideration relevant to the execution of the order

For our clients, price will normally be the most important aspect in obtaining the best possible result.

7IM will therefore assume that the best available price is the most important outcome for your transaction unless, you specify at the time of dealing that another factor is of greater importance. 7IM will use its discretion to observe market behaviour in order to achieve Best Execution, this

includes allowing the market to settle post open, during fast markets and participation in auctions.

7IM may, in limited circumstances, charge clients a transaction based commission (please refer to our terms and conditions) however we do not pass on the cost of executing on venues. This allows us to focus purely on the above factors. To avoid conflicts of interest and discriminate unfairly between execution venues, 7IM do not receive any remuneration, discount or non-monetary benefit for routing client orders to a particular trading venue or execution venue.

In some circumstances, for some clients, orders, financial instruments or markets, we may determine that other Execution Factors are more important than price in obtaining the best possible execution result.

7IM will take all sufficient steps based on those resources available to us to satisfy ourselves that we have processes in place to enable us to obtain Best Execution when executing your orders. We cannot guarantee that we will always be able to provide Best Execution of every order executed on your behalf.

MIFID II CLASS OF FINANCIAL INSTRUMENT

Equities (Tick size bands 1 – 6):

All UK Equity trades will be routed electronically in the first instance to a Retail Service Provider (RSP) subject to limits both in monetary value and Normal Market Size (NMS) relative to their market listing. These limits are in place to ensure the order is appropriate for a RSP and to ensure minimum market impact. Should the order size / value be outside of these pre-set limits or the price returned from the RSP is outside of the current best BID / ASK spread then the order will not be executed and move to an exceptions queue.

The 7IM Dealers will be alerted to an exception immediately and fully review the order as part of our pre-trade checks to establish liquidity, Average Daily Volume (ADV) etc. of the order. The Dealers then have the option to re-quote the RSP, if they deem there to be sufficient liquidity or liaise with our wide range of Market Makers / Liquidity providers to obtain Best Execution as per above factors.

International Equities are routed to Agency Brokers with International presence and expertise, settling in the local settlement centre.

Venues used to execute this business:

Bank of Montreal
 Canaccord Genuity Limited
 Cantor Fitzgerald
 Cenkos
 Fidante Partners Europe Limited
 Finncap
 Investec Bank PLC
 Jefferies International Limited
 JP Morgan Securities
 KCG Europe Limited
 Liberum Capital Limited
 Numis Securities Limited London
 Panmure Gordon
 Peel Hunt
 Royal Bank of Canada
 Shore Capital
 N+1 Singer
 Stifel Nicolaus Europe Limited
 Stockdale Securities
 Winterflood Securities

Debt Instruments (Bonds and Money Market Instruments)

Fixed Income will primarily be quoted via the RSP by using the above limit rules. If however, the Instrument is not available or too large for the RSP then the Dealers will contact a number of Counterparties to obtain Best Execution.

Where the size of the deal is of Institutional value (varies by instrument) then the Dealers have access to Request for Quote (RFQ) systems which allow up to five brokers to quote on our selected size in competition. Previous hit ratios are reviewed to determine the brokers to direct the orders based on past performance.

Venues used to execute this business:

BNY Mellon (offers access to a wider pool of counterparties)
 Canaccord Genuity Limited
 Cantor Fitzgerald
 F&G Securities
 Winterflood Securities

Exchange Traded Products (ETF's and ETN's)

Exchange Traded Products are quoted via the RSP by using the above limit rules. If however, the Instrument is not available or too large for the RSP then the Dealers will contact a number of Counterparties to obtain Best Execution. Previous hit ratios are reviewed to determine the brokers to direct the orders on based on past performance.

Where the size of the deal is of Institutional value (varies by instrument) then the Dealers have access to Request for Quote (RFQ) systems which allow up to five brokers to quote on our selected size in competition.

7IM have relationships with most of the ETF market makers and trade on a NET basis. This further enhances our offering as we do not have to interact with 'middle men' (Banks, Brokers etc.) therefore incurring increased costs to source pricing and liquidity.

Venues used to execute this business:

Commerzbank
 Flow Traders B.V
 Jane Street Financial Limited
 KCG Europe Limited
 Peel Hunt
 Stifel Nicolaus Europe Limited
 Susquehanna International Securities
 Royal Bank of Canada
 Winterflood Securities

N.B. – The above counterparties will be updated every six months for all MiFID II Class of Financial Instruments.

Model Portfolio Rebalances

Once a model has been updated and submitted via the online Platform, the initial sale trades (and buys if client has sufficient cash) will be executed within 48 hours. Any subsequent trades will be executed when sufficient cash is available which may take place over a number of days, dependent on settlement periods. Longer timeframes may be experienced if the model includes the below:

- Large volumes / values of client trades submitted (i.e. >£50,000).
- Securities with non-standard dealing points (weekly, monthly, yearly etc.)
- Funds requiring a notice period (T-Funds).
- Listed securities where there is insufficient liquidity to execute immediately and subsequently needs to be worked in the market for an extended period of time.
- Mutual Funds whereby 7IM do not have an account opened at the Fund Managers Transfer Agent.

Subsequent purchases will then be released in line with settlement periods to ensure the client's cash is being fully utilised and trades funded sufficiently.

EXECUTION VENUES

At 7IM our Dealers have access to a huge range of execution venues via approved counterparties in order to facilitate best execution for our client orders. Counterparties are reviewed regularly by our Best Execution Committee to ensure we have sufficient relationships and coverage across all asset classes to provide Best Execution, which could lead to the addition of further Counterparties. The committee also review the performance of Counterparties by using third party Transaction Cost Analysis (TCA) tools and will approve the removal if we feel the counterparty is not providing Best Execution.

We will execute our client orders on an agency basis using the following methods or a combination of:

- Regulated Markets (RE)
- Multilateral Trading Facilities (MTF)
- Organised Trading Facilities (OTF)
- Systematic Internaliser (SI)
- Other liquidity providers including market makers
- Any other relevant execution venue

7IM will never deal on our own account and therefore will never quote a price to a client, again removing any conflict of interest when achieving Best Execution.

7IM may deal on other markets if by doing so helps us to obtain the best overall result and in accordance with this policy. We will confirm on contract notes (where issued) where an order has been executed.

For large transactions or for instruments with limited liquidity our dealers will use their experience with the objective of achieving the best possible outcome. When Dealing in 'Quote Driven' markets, 7IM will continue to abide by our Best Execution Policy in carrying out pre-trade analysis and ensure we have sufficient counterparty relationships. Quote Driven trades are also subject to TCA analysis.

We will monitor the availability and execution quality of alternative markets periodically to gain assurances that we are delivering the best outcome for our clients.

For collective investment schemes, domiciled in the UK and offshore, we will deal directly with the Fund Manager or their designated Transfer Agent.

On a yearly basis, 7IM will publish its Top 5 Venues (Counterparties) on the 7IM website as per MiFID II rules on our website: www.7im.co.uk.

EXECUTING YOUR ORDER

In executing your order we:

- Will not trade as Principal.
- Will always trade as an Agent.
- May deal on a NET basis with due consideration given to the overall outcome.
- Will apply a range of criteria when determining which counterparties we deal with including the overall level of service delivered.

- Ensure there are no conflicts of interest with other business flows.*
- Such considerations under COBS Inducement rules will not affect our principal objective to achieve the best possible price. 7IM will not receive any remuneration, discount or non-monetary benefit for routing client orders to a particular trading venue.
- Where possible, client orders will be aggregated. These orders will be subject to our internal fair allocation policy unless the Dealers feel the aggregation will disadvantage the client. Aggregation of orders may occasionally work to the client's disadvantage resulting in our clients obtaining a worse price than if their order was executed separately and may be subject to rounding.

Such considerations will not affect our principal objective to achieve the best possible price. These considerations may include:

- The provision of research – post MiFID II all Research costs must and will be unbundled.
- Ongoing support.
- Maintaining relationships with an appropriate range of counterparties.

* Given our Retail and Institutional business flow, the Dealing Desk may receive an identical security and direction trade whilst working an existing order. In this instance the time the order has been received will take precedence in execution unless the Dealers deem it in the client's best interest to aggregate the order. Due to our use of STP RSP trading, an order could bypass the above rules but the Deal will be of insignificant size to impact the order in progress.

Route to markets across all asset classes are now predominantly via electronic formats and therefore in certain circumstances, including system outages, we may not be able to transmit your order in a timely manner, resulting in a delayed execution. These routes could include 7IM's internal systems, electronic connections to vendors, electronic platforms, venues or any other order electronic messaging methods. Any deals submitted during these circumstances will be dealt, as soon as possible, unless there is a systemic issue within the financial markets.

When instructions are received to invest or raise cash using target amounts, we will aim to execute as close to the target amount as possible, however due to the nature of these orders, the actual amount invested may be under or over the target requested.

Given the manual and paper based nature of execution, Non Listed Structured Products must be instructed 5 business days prior to the deadline date.

We rely wholly on the product provider confirming payment requirements and correct Bank Account details as part of the trade affirmation process. Failure to do so and subsequently trades failing due to lack of funds is out of our control. In these instances we will aim to deal in a timely manner given the circumstances and receipt of this information.

SPECIFIC INSTRUCTIONS

If you have given instructions that price is not the most important factor in executing your instructions 7IM will make every effort to comply with your instructions but cannot guarantee this. This may be due to either the nature of the order, or the type of financial instrument you wish to trade in. 7IM will make all decisions as to where orders are placed in relation to the Execution Venue – we will therefore not accept specific instructions from you regarding the venue where your order is executed. In executing specific instructions, 7IM may not be able to apply the methods of Best Execution set out in this policy.

LIMIT ORDERS / ORDER TYPES

7IM do not accept limit orders.

CHARGES

It is 7IM's policy that its commission and charging structure will not influence either the selection of Execution Venues or the order flow that follows as a result of the execution process. 7IM will not therefore discriminate between the Execution Venues we use to execute your orders.

USE OF THIRD PARTIES

7IM is classed as a 'Professional Client' with all counterparties and are not subject to Third Party Best Execution rules. The client will therefore rely on 7IM's own monitoring as per this Best Execution Policy which is overseen by the Best Execution committee.

CROSSING TRADES

In the event that clients wish to execute opposing (i.e. buy / sell) transactions in the same security our standard policy will be to execute these transactions in the market at the minimum possible cost to each client and with the constant principle that the price achieved will be fairer to each participant in the transaction. This policy will ensure that the transactions are executed at arms' length and with appropriate price discovery and transparency.

FUNDS DEALING (INCLUDING UNIT TRUSTS AND OEICS – DOMICILED IN THE UK AND OFFSHORE)

The price of the fund is based on the value of the underlying assets. 7IM undertakes to make all reasonable efforts to execute all orders received up to one hour prior to the fund dealing cut-off time, wherever we have electronic order-routing in place. For those instructions received after our cut-off and for any funds which require manual dealing, orders will be placed prior to the next available dealing cut-off time, on a best endeavours basis.

Please note we cannot guarantee the trade date for funds that are subject to 'payment up front' due to the manual nature of the process and the lack of vendor static data. We will always aim to deal in a timely manner but we are dependent on Transfer Agents confirming relevant details such as payment requirements and bank account details as part of the trade affirmation process.

MONITORING AND REVIEW OF OUR EXECUTION POLICY

7IM will have appropriate controls and procedures in place to give reasonable assurance that we are obtaining the best possible results for you when executing orders. These processes will be periodically monitored by our Compliance Department and Best Execution Committee.

We will review this Execution Policy and our order execution arrangements regularly by the Best Execution Committee and whenever a material change occurs that affects our ability to continue to obtain the best possible result for our clients.

7IM will regularly assess the Execution Venues available in respect of any products that we trade to identify those that will enable us, on a consistent basis, to obtain the best possible result when executing orders. The list of Execution Venues will then be updated, where necessary, following such assessment.

The most recent version of our Execution Policy, including any future amendments, will be available from our website: www.7im.co.uk.

QUESTIONS

If you have any questions regarding our Execution Policy, please contact us or your Adviser or Relationship Manager.

GLOSSARY

Retail Service Provider (RSP): RSP network provides access to price quotation and automated trading services for intermediaries servicing the retail investor market.

Average Daily Volume (ADV): The average daily volume is the amount an individual security is traded in a day on average over a specified period of time. Trading activity relates to the liquidity of a security when average daily trading volume is high, the stock can be easily traded and has high liquidity.

Normal Market Size (NMS): The maximum number of shares in a listed company that can be traded in a single transaction at the price quoted by the market maker. The normal market size is normally set at 2.5% of the total volume of shares for a given company. This stops very large trades from affecting the share price as market makers are not obliged to provide quotes for transactions which fall outside of the normal market size.

Market Maker (MM): A brokerage or bank that maintains a firm Bid and Ask price in a given security at publicly quoted prices (called making a market). These firms display Bid and Ask prices for specific numbers of specific securities. Market Makers are very important for maintaining liquidity and efficiency for the particular securities that they make markets in.

BID / ASK Spread: A bid / ask spread is the amount by which the ask price exceeds the bid price for an asset in the market. The bid / ask spread is essentially the difference between the highest price that a buyer is willing to pay for an asset and the lowest price that a seller is willing to accept to sell it.

For more information call 0207 760 8777 or visit www.7im.co.uk