



Slavery and Human Trafficking Statement

For the financial year ending 31 December 2023

Seven Investment Management LLP (“7IM”) is committed to taking our responsibilities as a corporate citizen seriously. We acknowledge our responsibility to take steps against the risks of slavery and human trafficking taking place in our business and supply chains.

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 (the “Act”) and constitutes 7IM’s Modern Slavery and Human Trafficking Statement for the financial year ending 31 December 2023.

Our business

At 7IM, we want to deliver an unrivalled experience for all of our clients – whether that’s individuals, families or businesses.

For financial advisers and planners, this involves us standing alongside them to support them with whatever they need, so they can focus more on what really matters: nurturing their relationships with clients to deliver on their financial plans. Our offering for advisers reflects that: an open architecture platform, multi asset investment solutions to fit whatever their investment philosophy is and help with discretionary investment management. For our private wealth clients, it all starts with understanding the client, their families, and their goals and then creating a bespoke financial plan designed to help them achieve financial freedom.

Today, from our offices in London and Edinburgh, our team of approximately 400 talented people are entrusted to manage over £20 billion (as at December 2023) for a range of clients, including individuals and families, financial advisers, corporates, charities and trustees.

Our supply chains

Our supply chains consist mainly of key outsourced providers of regulated financial services and suppliers in respect of data, IT, operations, office and support services, and professional advisers. Our supply chains are more straightforward in comparison to providers of physical goods or other types of services. We, therefore, believe that the risk of slavery and human trafficking practices by our suppliers is relatively low. Nonetheless, we are aware of modern slavery threats in the financial services industry and recognise the importance of combatting modern slavery and our responsibility to take steps to tackle the issue.

Our policies and procedures

We have several policies and procedures in place which reflect our commitment to acting with integrity in our business relationships and which help us to detect and prevent any potential modern slavery within our business and supply chains. These include an anti-money laundering policy, anti-bribery, and other financial crime-related policies and procedures. We also encourage our staff to report any concerns they may have under our whistleblowing policy. As with previous years, we have continued to review and update these policies and procedures on an ongoing basis and require that all staff electronically attest that they have read and understood all such policies at appropriate intervals.

Our approach to suppliers

During 2023 we implemented new processes and procedures relating to the lifecycle management of our third party suppliers. All suppliers have now been attributed a risk rating and we conduct prescribed due diligence on each supplier dependent upon the risk rating they have been given. Where appropriate, this includes initial and ongoing due diligence on a supplier’s adherence to their statement publication requirements under the Act. Where relevant, when entering into new agreements with suppliers we require confirmation of their compliance with all applicable laws, which would include the Act.

We are committed to continually reviewing and evolving our third party supplier processes to make additional improvements where we can, and these include improvements that can help to increase our efforts in combatting modern slavery in our supply chains.

Responsible investing

Turning to our investment process, 7IM continues to be a signatory to the Principles for Responsible Investment (“PRI”) and the UK Stewardship Code. As signatories to these organisations, we have committed to incorporating Environmental, Social and Governance factors into our investment process and the PRI have awarded us with scores that are higher than average for firms of our size in their yearly assessment reports. As part of this and in reference to the Modern Slavery Act, we have increased the due diligence we conduct on the firms we invest with by asking them to provide additional details relating to how they meet their corporate social responsibilities, including requesting details as to how they are considering the risks relating to modern slavery. We have also invested in using a third party due diligence aggregator so as to enhance the resources available to us in performing our due diligence.

Training

We recognise the importance of training our staff in order to raise awareness of modern slavery threats in our business and supply chains, and provide training relating to anti-modern slavery, anti-money laundering and financial crime. Training is provided to both new members of staff when they join 7IM, as well as to all members of the 7IM team as part of our regular training programme. We review and update our company-wide training programme on a regular basis and, as part of this, we regularly review both our current and potential training providers to ensure our staff are receiving appropriate and effective training.

Our effectiveness in combatting modern slavery in our business and supply chains

Key stakeholders meet to review and assess the steps we have taken to combat modern slavery in our business and supply chains. We look to identify any further measures we can take to help detect and prevent modern slavery and enhance the effectiveness of our approach. We will continue to review our policies, procedures, and processes within our overall culture and governance framework.

Our commitment to anti-modern slavery

In addition to working proactively to combat anti-modern slavery in our business and supply chain, as with previous years we will voluntarily publish this statement to the government’s Modern Slavery Statement Registry.

7IM is a limited liability partnership and this statement has been approved by 7IM’s members in accordance with its governance procedures.

Signed:



Duncan Walker
Designated member
For and on behalf of 7IM