



6 September 2022

## Automotive components



Source: Refinitiv

## Market data

EPIC/TKR	SCE
Price (p)	47
12m high (p)	70
12m low (p)	37
Shares (m)	195.4
Mkt cap (£m)	91.9
EV (£m)	85.0
Free float*	67%
Country/CCY of listing	UK/GBP
Market	AIM

\*As defined by AIM Rule 26

## Description

Surface Transforms (SCE) is 100% focused on manufacture and sales of carbon ceramic brake discs. It has capacity in place, rising to £50.0m annual revenues by 2023.

## Company information

Non-Exec. Chair.	David Bundred
CEO	Dr Kevin Johnson
Finance Dir.	Michael Cunningham

+44 (0)151 356 2141

[www.surfacetransforms.com](http://www.surfacetransforms.com)

## Key shareholders

Directors	9.0%
Richard Sneller esq.	12.2%
Cannacord	11.9%
Unicorn AM	9.1%
Richard Gledhill esq. (dir.)	7.7%
Janus Henderson	4.1%

## Diary

Dec'22	Trading update
May'23	Final results
Jun'23	AGM
Sep'23	Interim results

## Analyst

Mike Foster +44 (0)203 693 7075  
[mf@hardmanandco.com](mailto:mf@hardmanandco.com)

## SURFACE TRANSFORMS

## Further new order, upgrades, production ramp-up

We are very encouraged by the further significant upgrades following SCE's interim results announcement. This is over and above the upgrades from August's new OEM 9 order. The order book is now £190m (£50m end-2020), with more rises promised before end-2022. The results, announced 5 September, cover a period where production ramp-up was impressive and the resilience of gross margins proven. The major milestone of profitability is achieved this half year. We raise 2024E EPS by 39%, on a 12% sales upgrade. Operational gearing is at play but also the confirmed continuing robustness of gross margins.

- ▶ **Order book quadruples in under two years:** The most recent win is a new customer, OEM 9. SCE is winning more than its fair share in this rapid-growth market. Three OEMs generate 2023E revenue, five in 2024E. End-sales of these car models have waiting lists themselves, which adds visibility too.
- ▶ **Growth ramp-up:** 2H22E revenue, remarkably, is over eight times 2H21. When many businesses are seeing gross margins fall, SCE has not; indeed, we upgrade 2022. Year-in/year-out cost efficiencies – shared with customers to grow the market – are a given. Importantly, they are ahead of expectations.
- ▶ **Direction of travel:** Globally, there is only one – larger – competitor, and SCE is taking share. It is clear and detailed about its extra contract pipeline of new models for existing customers and also of new OEMs. This is because of lengthy interaction with OEMs pre-order. Rapid capacity growth matches this.
- ▶ **Risks:** Sales increases lead to a definable rise in working capital needs. New capacity has now been successfully commissioned but is always a risk. Much capex is in \$, which is all hedged. Gas is a noticeable input and our numbers assume high prices, which SCE is countering through major efficiency gains.
- ▶ **Investment case:** SCE is rapidly growing its 10% market share in this fast-growth market. Single supply was a most anomalous position for an auto OEM market; now SCE is one of only two suppliers. Thus, the OEM 8 orders, while true “game changers”, simply fitted into the broader SCE place in the market expansion. Now OEM 9 has arrived too. SCE delivers on a global OEM base.

## Financial summary and valuation

Year-end Dec (£m)	FY'20	FY'21	FY'22E	FY'23E	FY'24E	FY'25E
Sales	1.95	2.37	12.50	23.00	33.50	40.00
EBITDA	-2.32	-3.78	1.50	4.90	10.00	12.80
EBITA	-2.81	-4.45	0.20	2.50	7.40	9.80
PBT	-2.92	-4.58	0.00	2.20	7.10	9.50
PAT	-2.31	-3.95	0.70	2.90	7.10	9.50
EPS (adjusted, p)	-1.54	-2.08	0.36	1.48	3.62	4.80
Shareholders' funds	5.67	20.89	20.40	23.30	30.40	39.90
Net cash/(debt)	0.50	11.40	-1.00	-1.00	-1.00	2.00
P/E (x)	loss	loss	n/m	31.7	13.0	9.8
EV/sales (x)	43.6	35.9	6.8	3.7	2.5	2.1
EV/EBITDA (x)	loss	n/a	56.7	17.3	8.5	6.6
DPS (p)	nil	nil	nil	nil	nil	nil

Source: Surface Transforms, Hardman &amp; Co Research estimates

## Upgrades to 2023 and 2024

SCE explicitly states a new order – on top of August’s OEM 9 – expected in 2022...

...and we expect further major orders in 2023

Sales rose 140% in the half year reported; 2H22E eight-fold growth

Upgrade to 2023; 27% upgrade to 2024E PBT

Order book nearly quadruples in under two years; prospective order book twice that, again

SCE benefits from nine contracts with six OEMs

Our confidence in SCE’s momentum warrants us to initiate 2025E financials. For the reasons below, we believe future years, especially 2024 and 2025 are likely, more than likely, to see significant upgrades. The interim results outlook saw SCE explicitly repeat that it expects at least one more significant new order this year. We would expect this to increase 2024 (and particularly early 2025) sales further, with profits operationally geared. We expect further major orders in 2023 onwards.

### Interims and current second half

Interim results were as anticipated; sales increased by 140%, gross margins held broadly firm and administrative expenses rose in anticipation of 2H22. 2H22E annualised revenue is more than eight times the 2021 rate.

### 2024E PBT upgraded from £5.6m to £7.1m, 2023E rises too

Both the new-customer OEM 9 sales and the SCE outlook statement contribute to an upgrade. For 2024E PBT, this is a rise from £5.6m to £7.1m. See table, page 7.

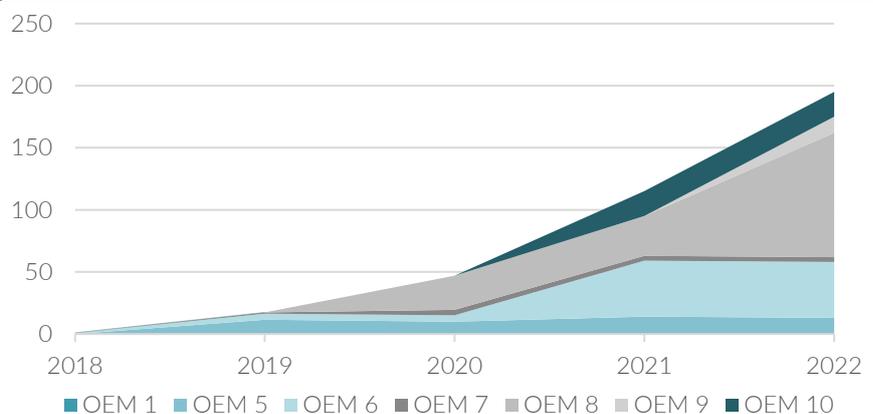
SCE is very granular in its market guidance and it stated: “looking forward to the three years 2023 to 2025, and having concluded volume discussions with OEM 8, the Board is very pleased to increase sales guidance in these years by approximately 10% p.a. .... There are some offsetting costs – approximately £0.8m p.a. reflecting additional production overheads to support sales growth.”

## Detailed analysis of rapid order growth

The business is now profitable. Importantly, rapid sales increases reflect only the current order book. Given how the order book has risen (see chart below), the momentum to future sales upgrades is clear. SCE states the prospective contract pipeline at £400m. Typically, an order commences production 24 months after the win. This is the case for the £13m contract announced last month, with an entirely new customer, OEM 9. We would strongly expect, therefore, our 2024 sales estimates will be upgraded in due course, with profits operationally geared.

Manufacturing sales capacity of £20m will have risen to £50m by early next year, a timetable recently brought forward from mid-2023. Further expansion will come.

Order book at calendar year-end (£m)



Notes: the 2022 figure is as of date of this publication. OEM 1 has been a relatively small client. Source: Hardman & Co Research, Surface Transforms presentation

## New order

### New customer OEM 9 announced 30 August

SCE sells to European-based, US-based, electric and internal combustion OEMs. A strong auto component business covers all bases.

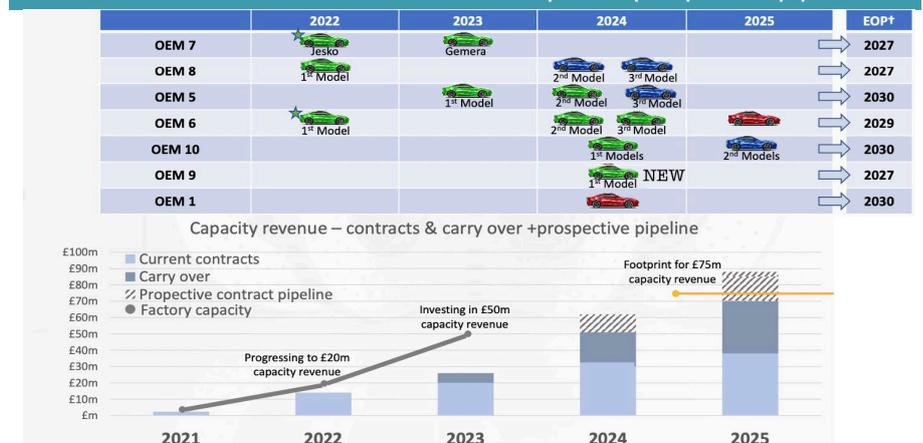
The new order from OEM 9 is a multi-year exclusive supply to both axles. This is not just an end-customer option component. There has been strong visibility to an order for some while. In passing, OEM 10 came 13 months ago; there is a wide range of prospective OEMs testing the product, allotting to new models and so queuing to be delivered, we believe. Almost exactly half of SCE’s order book currently is with a leading US-based global EV OEM (OEM 8) and, now, OEM 9 can be said to complement SCE’s positioning in this large rapidly growing automotive segment. SCE supplies a higher percentage of the total output of EV market challenger OEM 9, compared with the very important OEM 8 position. We consider this SCE sales profile no longer to be a situation of gaining traction, it is rather covering all bases: electric, internal combustion, US-based global suppliers, European-based global suppliers.

### Detailed multiple drivers to ongoing major growth

We expect sales numbers to be upgraded in the future as “carry over” models become live orders and as further, new, OEMs (above and beyond OEM 10) make an appearance. Carry over is defined as the anticipation of a contract win into a new model from an existing customer. This has already happened in British OEM 6 and Continental European OEM 5 and OEM 7.

SCE has explicitly presented its best prospects (blue and red in chart), which are not yet in profit estimates and would upgrade 2024 revenue

#### Production volumes from current orders and part of prospective pipeline



Key: GREEN active contracts; BLUE carry over; RED prospective contracts; YELLOW factory capacity  
 SOP: Start of Production; EOP End of Production  
 Source: Surface Transforms presentation, Hardman & Co Research

Sales estimates are detailed, aggregated bottom-up, model by model, each of which has an annual (monthly) quantified offtake. The overwhelming majority of these models benefit from a large end-customer, pent-up, firm, order demand, facilitating the highly predictable SCE off-take profiles.

Long term now paying off

### Many years’ building a huge “economic moat” in an explosive growth market

Recent years have tested SCE’s supply chain and it’s come through with flying colours

This has taken time, as the OEM customers are very careful with this safety-critical component. OEM and SCE spend many years carrying out testing, with each customer having its own particularities. SCE has demonstrated that many of these programmes come to fruition. Many are still in progress. The first bespoke pieces were supplied in 2002. Manufacturing being honed over many years provides excellent hurdles to new competition. OEM trials, on-road retrofit and track cars have brought proof-of-performance for SCE. So too has its supply-chain resilience, tested in recent years.

## Operational delivery

This brief update publication can only provide the broad picture on delivery. The main message is that SCE's constant improvements applied to a relatively new manufacturing process and new product are the value creators.

### *Manufacturing efficiencies grow the market and make the shorter term robust*

Consistently delivered efficiencies are key to SCE unlocking growth in global market sales to more than a hundred times its 2023 revenue

Manufacturing costs have halved in recent years, and are on track to halve again in a relatively short number of years. This, at some point, will tip the product into being a mass-market possibility, boosting global market sales to well above a hundred times SCE's sales in 2023 (or 2025 for that matter). How much of this would SCE secure? Time will tell, but there are only two suppliers, none on the horizon and SCE has the superior product. All the while, this enables SCE to maintain its gross margins while customers see large price paring.

So, how exactly does this efficiency drive make the short term more robust? Capital is precious and SCE has made major efficiencies here, in the past year.

### *Capital cost efficiencies*

In 2021, £50m capital cost requirement honed down to £40m, at same time as annual capacity delivered from this rose from £50m to £75m

As of the September 2021 manufacturing strategy update, management stated that an original £50m total factory capital equipment requirement had been reduced to £40m (much of which has been spent to date), a saving of £10m. It also stated that, subject to capital investment, the total factory capacity could be reconfigured upwards to a new figure of £75m p.a. revenue. This is not new information, but it demonstrates the detailed planning behind the delivery of the current major step-change. Customers and potential customers see it, and we consider this to be just as important to winning orders as the product and manufacturing engineering itself.

### *Manufacturing efficiencies: a quantified, worked example*

A worked example of how SCE's efficiencies come, and how company is open about risks and mitigations, leading to rewards

The programmes are too numerous to list, but one may be chosen to illustrate. Gas provides carbon for the product, via a complex but well-honed chemical "cooking" process. If no efficiencies had been made, the 2022 (to date) change in gas prices would have hit gross margins. SCE indicates that the gas market should not, even with the current outlook, have any net impact on gross margins.

SCE guidance is very specific, as it is with the composition of the prospective order book and the capital cost efficiencies. This is really important to us. It is, therefore, worth quoting the SCE update within the 2021 results of 4 April 2022: "Without action, a tripling in energy costs would reduce gross margin percentage by around five percentage points. Fortunately, by 2023, this is likely to be offset by a number of energy efficiency projects that are already under way on the existing furnaces. Additionally, our new furnaces are significantly more efficient than our existing furnaces which, combined, will offset the current range of anticipated commodity increases. Therefore, we are not forecasting gross margin percentage deterioration in 2023 or beyond from this source." SCE is also carefully assessing its extensive, detailed work on the business case for a CHP plant. There are a large number of efficiency-optimising projects on the go and delivering, and there always have been.

## Risk mitigations

High R&D, high growth, significant barriers to competition

This is a high-growth, strong-margin, high-barrier-to-competition business, which has now broken through to profitability. It has a multi-year track record and multi-year prospects of significantly raising production efficiencies, and its R&D-led intellectual property (IP), which is unlikely to be easily copied, is a significant factor. Nonetheless, such a rapid growth curve brings risks.

Main investment drivers

Some key points	
Bull factors	Risks and challenges
Excellent product, better than competitor's Order book more than doubling every year Only one competitor, and high barriers to entry Enables clients to meet environmental issues and better air quality has risen up the agenda End-customer waiting lists on models being supplied	Supply chain, cost management: achieved SCE has coped with OEM timeline flexing Order bunching needs capacity in place  Cash absorbed by growth capex Product and manufacturing performance excellence: achieved consistently

SCE pretty open about crucial details

Become expert, following many years' raising expertise. Engineering-applied, IP-led.

- ▶ As mentioned, a major input is natural gas. The fixed price contract – which is with a Russian supplier – expires in May 2023. As investment into capital equipment is undertaken – for example, the carbon vapour infiltration system – significant reduction in gas usage is facilitated. Energy efficiency projects are already under way. Further, new furnaces are more efficient.
- ▶ Gross margin maintenance relies on ongoing efficiency increases. SCE now has a decade (plus) experience in quantifying, anticipating and delivering this large number of improvements. This is an IP-based business (some at chemistry PhD level), applied to a robust manufacturing delivery.
- ▶ Clearly, the product is a globally priced competitive market and, in due course, the mix of all input costs and efficiency gains would tend towards evening out. As a supplier to a global market from a sterling cost base, the weakening pound does no harm.
- ▶ Product integrity is crucial. Not only has it been selling its products for over a decade for use in high-performance track and road conditions, without failures, but the current manufacturing plant has been in use for several years also.
- ▶ Capacity is being expanded very significantly. Some large-cost items (e.g. furnaces) are priced in \$. All this \$ exposure is fully hedged. Nearly all contracts are priced in sterling. This might be seen as a modest positive, currently cutting the local-currency cost to the OEM. The point is that all gross margins are as locked in as can be.
- ▶ SCE has set out its manufacturing strategy in detail. Current capacity expansion goes hand-in-hand with a 2021 efficiency-raising and flexibility-raising refinement of the manufacturing strategy, and a major production ramp up this year. Management has been explicit about the costs (which have been improved on) and timelines, as well as the detailed capital equipment cost and configuration methodology.
- ▶ Product obsolescence is important in the automotive market. Carbon ceramic brakes are relatively new, and so on a major upswing. They also tick the regulatory boxes regarding the OEMs' need for fuel efficiency and better air quality. Not only do the discs weigh less, but, more importantly, the whole chassis arrangement can be made lighter than the traditional iron disc brakes.

Clear manufacturing strategy and outperformance of projections

The carbon ceramic brakes allow for a much lighter chassis and the weight saving saves significant fuel. The minimal particulate generation is ever more important in the environmental agenda, regarding air quality benefits. We believe it is difficult to overstate the benefit of this issue for medium-term major demand growth.

## Financials

### Upgrades include 39% to 2024E EPS

New OEM 9 affects sales in 2024. 2023 and 2024 OEM 8 sales raised. Gas price rises but gross margin estimates hold firm.

#### Current financial estimates (£m) revisions

Fiscal period	Previous 2023 estimates	New 2023 estimates	Previous 2024 estimates	New 2024 estimates
Sales	19.50	23.00	30.00	33.50
Gross profit	12.67	14.95	19.50	21.80
Gross profit margin	65.0%	65.0%	65.0%	65.0%
EBITDA	3.40	4.90	8.40	10.00
EBITA	1.00	2.50	5.80	7.40
PBT	0.80	2.20	5.60	7.10
EPS (p)	0.77	1.48	2.61	3.62

Source: Company announcements, Hardman & Co Research

2024E registers a 39% upgrade in EPS vs. 27% upgrade in PBT. SCE has stated that no tax is now expected to be due for 2024 or 2025. Estimates are from current firm contracts only. Active discussions are on top of this.

SCE presentations illustrate possible £50m 2024E sales revenue if active further client discussions are added

#### Revenue estimates (£m) over past year, and prospects

Fiscal period	Sales estimates as of September 2021	Current sales estimates	Current estimates plus active discussions on model carry-over *
2022E	12.0	12.5**	12.5
2023E	17.0	23.0	25.0
2024E	25.0	33.5	50.0
2025E	n/a	40.0	70.0

\*As stated per company presentations

\*\* A modest rise, but gross margins raised by "richer" mix

Source: Company announcements, Hardman & Co Research

We model £33.5m revenue for 2024E from existing contracts alone

## Results and current estimates

### Revenue

Forward estimates are based solely on firm programme sourcing activities and nominations, that is to say firm orders. SCE states its firm prospects are more than double the current (rising) £190m order book.

Revenue account						
Year-end Dec (£m)	FY'20	FY'21	FY'22E	FY'23E	FY'24E	FY'25E
Sales	1.95	2.37	12.50	23.00	33.50	40.00
Gross profit	1.31	1.55	9.13	14.95	21.78	26.00
Gross margin	67.0%	65.0%	73.0%	65.0%	65.0%	65.0%
R&D & overheads	-3.63	-5.58	-7.83	-10.25	-11.98	-13.40
R&D capitalised*	0.00	0.25	0.20	0.20	0.20	0.20
EBITDA	-2.32	-3.78	1.50	4.90	10.00	12.80
EBITA	-2.81	-4.45	0.20	2.50	7.40	9.80
Net finance income**	-0.11	-0.13	-0.20	-0.30	-0.30	-0.30
PBT (adjusted)	-2.92	-4.58	0.00	2.20	7.10	9.50
Exceptional items	0.00	0.00	0.00	0.00	0.00	0.00
Tax credit***	0.61	0.63	0.70	0.70	0.00	0.00
PAT	-2.31	-3.95	0.70	2.90	7.10	9.50
EPS (diluted, adjusted, p)	-1.54	-2.08	0.36	1.48	3.62	4.80
DPS (p)	0.00	0.00	0.00	0.00	0.00	0.00

\* Included within line above. \*\* Non cash, accounting item. \*\*\* This may continue beyond 2023, but we aim to estimate conservatively.

Source: Surface Transforms accounts, Hardman & Co Research estimates

The strategic report to the 2021 full-year report stated that ongoing investment at the operating cost expenditure as well as capex means that return on sales (EBIT level) will be limited to “single-digit percentage...for the next few years, but we believe that we could reach 20% by 2024 and 2025.” This was subsequently, recently, revised upwards with the upgrades at the time of the 1H'22 results.

## Balance sheet

Balance sheet						
@ 31 Dec (£m)	FY'20	FY'21	FY'22E	FY'23E	FY'24E	FY'25E
Shareholders' funds	5.67	20.89	20.40	23.30	30.40	39.90
Net cash/(debt)	0.50	11.40	-1.00	-1.00	-1.00	2.00
Avg. shares diluted (m)	149.80	190.00	195.10	196.00	197.00	198.00

Source: Surface Transforms accounts, Hardman & Co Research estimates

Gross cash held at end-1H'22 was £6.7m. This is reducing in part through measured WIP rises and with an estimated £10m-£12m capital expenditure in the full year 2022. Net cash is reckoned, excluding lease liabilities. It includes long-term elements classed as debt, which do not bear interest and, in some regards, are grant-related.

## Cashflow

Cashflow						
Year-end Dec (£m)	FY'20	FY'21	FY'22E	FY'23E	FY'24E	FY'25E
Cash from operations, pre-tax	-1.34	-4.10	-0.35	3.90	4.00	7.80
Equity issuance	2.26	18.90	0.00	0.00	0.00	0.00
Net cashflow	0.28	10.90	-12.35	-0.10	0.00	2.80
Depreciation*	0.49	0.67	1.30	2.40	2.60	3.00

\*Includes small amounts of IFRS2 share-based payments

Source: Surface Transforms accounts, Hardman & Co Research estimates

Cashflow has flexibility to undertake capex and fund working capital, with the former front-loaded over the years covered and the latter growing with the top line. The element on the revenue statement classed as “interest” is a non-cash item.

## Disclaimer

Hardman & Co provides professional independent research services and all information used in the publication of this report has been compiled from publicly available sources that are believed to be reliable. However, no guarantee, warranty or representation, express or implied, can be given by Hardman & Co as to the accuracy, adequacy or completeness of the information contained in this research and they are not responsible for any errors or omissions or results obtained from use of such information. Neither Hardman & Co, nor any affiliates, officers, directors or employees accept any liability or responsibility in respect of the information which is subject to change without notice and may only be correct at the stated date of their issue, except in the case of gross negligence, fraud or wilful misconduct. In no event will Hardman & Co, its affiliates or any such parties be liable to you for any direct, special, indirect, consequential, incidental damages or any other damages of any kind even if Hardman & Co has been advised of the possibility thereof.

This research has been prepared purely for information purposes, and nothing in this report should be construed as an offer, or the solicitation of an offer, to buy or sell any security, product, service or investment. The research reflects the objective views of the analyst(s) named on the front page and does not constitute investment advice. However, the companies or legal entities covered in this research may pay us a fixed fee in order for this research to be made available. A full list of companies or legal entities that have paid us for coverage within the past 12 months can be viewed at <http://www.hardmanandco.com/legals/research-disclosures>. Hardman may provide other investment banking services to the companies or legal entities mentioned in this report.

Hardman & Co has a personal dealing policy which restricts staff and consultants' dealing in shares, bonds or other related instruments of companies or legal entities which pay Hardman & Co for any services, including research. No Hardman & Co staff, consultants or officers are employed or engaged by the companies or legal entities covered by this document in any capacity other than through Hardman & Co.

Hardman & Co does not buy or sell shares, either for their own account or for other parties and neither do they undertake investment business. We may provide investment banking services to corporate clients. Hardman & Co does not make recommendations. Accordingly, they do not publish records of their past recommendations. Where a Fair Value price is given in a research note, such as a DCF or peer comparison, this is the theoretical result of a study of a range of possible outcomes, and not a forecast of a likely share price. Hardman & Co may publish further notes on these securities, companies and legal entities but has no scheduled commitment and may cease to follow these securities, companies and legal entities without notice.

The information provided in this document is not intended for distribution to, or use by, any person or entity in any jurisdiction or country where such distribution or use would be contrary to law or regulation or which would subject Hardman & Co or its affiliates to any registration requirement within such jurisdiction or country.

Some or all alternative investments may not be suitable for certain investors. Investments in small and mid-cap corporations and foreign entities are speculative and involve a high degree of risk. An investor could lose all or a substantial amount of his or her investment. Investments may be leveraged and performance may be volatile; they may have high fees and expenses that reduce returns. Securities or legal entities mentioned in this document may not be suitable or appropriate for all investors. Where this document refers to a particular tax treatment, the tax treatment will depend on each investor's particular circumstances and may be subject to future change. Each investor's particular needs, investment objectives and financial situation were not taken into account in the preparation of this document and the material contained herein. Each investor must make his or her own independent decisions and obtain their own independent advice regarding any information, projects, securities, tax treatment or financial instruments mentioned herein. The fact that Hardman & Co has made available through this document various information constitutes neither a recommendation to enter into a particular transaction nor a representation that any financial instrument is suitable or appropriate for you. Each investor should consider whether an investment strategy of the purchase or sale of any product or security is appropriate for them in the light of their investment needs, objectives and financial circumstances.

This document constitutes a 'financial promotion' for the purposes of section 21 Financial Services and Markets Act 2000 (United Kingdom) ('FSMA') and accordingly has been approved by Capital Markets Strategy Ltd which is authorised and regulated by the Financial Conduct Authority (FCA).

No part of this document may be reproduced, stored in a retrieval system or transmitted in any form or by any means, mechanical, photocopying, recording or otherwise, without prior permission from Hardman & Co. By accepting this document, the recipient agrees to be bound by the limitations set out in this notice. This notice shall be governed and construed in accordance with English law. Hardman Research Ltd, trading as Hardman & Co, is an appointed representative of Capital Markets Strategy Ltd and is authorised and regulated by the FCA under registration number 600843. Hardman Research Ltd is registered at Companies House with number 8256259.

(Disclaimer Version 8 – Effective from August 2018)

## Status of Hardman & Co's research under MiFID II

Some professional investors, who are subject to the new MiFID II rules from 3rd January 2018, may be unclear about the status of Hardman & Co research and, specifically, whether it can be accepted without a commercial arrangement. Hardman & Co's research is paid for by the companies, legal entities and issuers about which we write and, as such, falls within the scope of 'minor non-monetary benefits', as defined in the Markets in Financial Instruments Directive II.

In particular, Article 12(3) of the Directive states: 'The following benefits shall qualify as acceptable minor non-monetary benefits only if they are: (b) 'written material from a third party that is commissioned and paid for by a corporate issuer or potential issuer to promote a new issuance by the company, or where the third party firm is contractually engaged and paid by the issuer to produce such material on an ongoing basis, provided that the relationship is clearly disclosed in the material and that the material is made available at the same time to any investment firms wishing to receive it or to the general public...'

The fact that Hardman & Co is commissioned to write the research is disclosed in the disclaimer, and the research is widely available.

The full detail is on page 26 of the full directive, which can be accessed here: <https://ec.europa.eu/transparency/regdoc/rep/3/2016/EN/3-2016-2031-EN-F1-1.PDF>

In addition, it should be noted that MiFID II's main aim is to ensure transparency in the relationship between fund managers and brokers/suppliers, and eliminate what is termed 'inducement', whereby free research is provided to fund managers to encourage them to deal with the broker. Hardman & Co is not inducing the reader of our research to trade through us, since we do not deal in any security or legal entity.



[research@hardmanandco.com](mailto:research@hardmanandco.com)

1 Frederick's Place  
London  
EC2R 8AE  
[www.hardmanandco.com](http://www.hardmanandco.com)

+44(0)203 693 7075