



Kirkoswald Capital Partners LLP

# MIFIDPRU Public Disclosure Document

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## 1 Overview and summary

Kirkoswald Capital Partners LLP (the 'Firm') is authorised and regulated by the Financial Conduct Authority (FRN 607529) as a Full-scope Alternative Investment Fund Manager and is categorised by the FCA, for prudential regulatory purposes, as a Collective Portfolio Management Investment ('CPMI') firm and MIFIDPRU investment firm. The Firm's regulatory permissions allow it to provide investment management services to Alternative Investment Funds ('AIFs' or 'Funds') and managed accounts/segregated portfolio mandates. It also reports to the SEC as an Exempt Reporting Advisor.

The Firm's clients pay procurement fees, or management fees, ranging up to 2% per annum and annual performance-based fees up to 40%, as further defined in the client's offering memorandum or investment management agreements. The Firm earns income from its co-investment activities with Firm's clients from an affiliated party. The Firm's income is allocated on a cost-plus methodology, which ensures its overhead is properly financed and adequate financial reserves are held.

The Firm incorporates robust risk management practices and sound financial forecasting which are reviewed, challenged and approved by the Firm's governing body annually, or when the business dictates a further review of internal controls is required. The Firm completed its ICARA in line with MIFIDPRU 7. A summary of the Firm's results follows.

For the purposes of MIFIDPRU, the Firm has been classified as a small non-interconnected ('SNI') firm.

The Firm has produced this Public Disclosure Document in line with the rules and requirements of MIFIDPRU 8, as applicable to SNI firms. This Public Disclosure Document has been prepared based on the audited financials as of 31<sup>st</sup> March 2022 covering the financial period 1st April 2021 to 31<sup>st</sup> March 2022.

## 2 Remuneration arrangements

The Firm has adopted remuneration policies and practices that comply with the requirements of chapter 19G of the FCA's Senior Management Arrangements, Systems and Controls Sourcebook ('SYSC').

In accordance with MIFIDPRU 8.6.2, the Firm makes the following qualitative remuneration disclosures:

- The Firm's remuneration policies and practices are reviewed annually to ensure they are appropriate and proportionate to the nature, scale and complexity of the risks inherent in the business model and the activities of the Firm.
- The governing body is directly responsible for the overall remuneration policy.
- The Firm ensures that its remuneration structure promotes effective risk management and balances the fixed and variable remuneration components for all staff.
- Variable remuneration is adjusted in line with capital and liquidity requirements as well as the Firm's performance.

Total remuneration is based on balancing both financial and non-financial indicators together with the performance of the Firm and the staff member's business unit. Kirkoswald Capital Partners LLP sets out

the criteria for setting fixed and variable remuneration. All remuneration paid to staff members is clearly categories as either fixed or variable remuneration.

- Fixed remuneration is based upon a staff member’s professional experience and organisational responsibility. It is permanent, pre-determined, non-discretionary, non-revocable and not dependent on performance.
- Variable remuneration is based upon staff members’ performance or, in exceptional cases, other conditions.

Performance reflects the long-term performance of the staff member as well as performance in excess of the staff member’s job description and terms of employment.

The Firm ensures that fixed and variable components of the total remuneration are appropriately balanced; and the fixed component represents a sufficiently high proportion of the total remuneration to enable the operation of a fully flexible policy on variable remuneration.

As an SNI firm, and in accordance with MIFIDPRU 8.6.8, Kirkoswald Capital Partners LLP is required to disclose the total amount of remuneration awarded to all staff, split into fixed and variable remuneration.

For the performance year ending 31 March 2022:

Total fixed remuneration awarded	£2,268,222
Total variable remuneration awarded	<u>£4,213,277</u>
Total remuneration awarded	£6,481,499

The Firm does not benefit from exceptional government intervention.