

MIFIDPRU Public Disclosure Document

ROXBURY ASSET MANAGEMENT LIMITED

Date as of 31st December 2021

For the period 1st January 2021 to 31st December 2021

Table of Contents

1	Overview and summary	3
1.1	Own funds requirements – MIFIDPRU 4.....	3
1.2	Concentration risk – MIFIDPRU 5	3
1.3	Liquidity – MIFIDPRU 6.....	3
2	Remuneration arrangements.....	4

1 Overview and summary

Roxbury Asset Management Limited (the “Firm”) is regulated by the Financial Conduct Authority (“FCA”) as a Markets in Financial Instruments (“MiFID”) firm and is subject to the rules and requirements of the FCA’s Prudential Sourcebook for MiFID Investments Firms (“MIFIDPRU”) handbook.

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 31st December 2021 covering the financial period 1st January 2021 to 31st December 2021.

The Firm’s main business activity was acting as the Investment Manager for an Irish domiciled UCITS Fund and the Investment Advisor for 2 Managed Accounts. The Firm parted company with its investment team in Q1 2022 but the Firm remains a well-capitalised going concern while new opportunities are sought.

1.1 Own funds requirements – MIFIDPRU 4

As an SNI firm without permissions for dealing as principal or holding client money or client assets, the Firm is subject to a Permanent Minimum Requirement of £75,000.

The Firm calculates its own funds’ requirements based on the Fixed Overhead Requirement (“FOR”) calculation and is not subject to any K-factor requirements.

The Firm has further assessed any risks facing its business operations within its ICARA and quantified additional own funds and liquidity, where required.

1.2 Concentration risk – MIFIDPRU 5

The Firm does not conduct any trading on own account and does not have regulatory permissions for dealing as principal. The Firm therefore does not have any concentration risks, on or off balance sheet, and does not operate a trading book.

1.3 Liquidity – MIFIDPRU 6

The Firm always maintains minimum liquidity in compliance with the Basic Liquid Asset Requirement (BLAR), being at least one-third of its FOR.

The Firm does not provide any client guarantees and therefore its entire liquidity requirement is driven by its expenses, as captured by the FOR.

As part of the ICARA, the Firm also maintains liquidity to satisfy its' net wind-down costs and any additional liquidity requirements which the ICARA identified for supporting the ongoing business activities of the Firm.

2 Remuneration arrangements

The Firm is making use of the transitional provisions in MIFIDPRU TP 12.9 whereby it is not required to disclose remuneration information as the period of this Public Disclosure Document ends before 1 Jan 2022.