

OCEAN DIAL ASSET MANAGEMENT LIMITED

Regulatory Disclosures

July 2022

Ocean Dial Asset Management Limited (“ODAM” or the “Firm”) is categorised as a MIFIDPRU Investment firm and is not part of an Investment Firms Group. ODAM has a permanent minimum requirement of £75,000.

Own Funds

At 31 March 2022, ODAM had own funds of £1,000,411 consisting of:

Instruments	(£)
Share Capital	411
Share Premium	180,000
Audited Retained Earnings	820,000
Total CET1 Capital	1,000,411

At 31 March 2022, ODAM had a fixed overhead requirement of £216,000.

Risk Management

ODAM’s Risk Management Framework fosters continuous monitoring of the risk environment and an integrated evaluation of risk and their interactions, it also ensures a consistent approach to monitoring, managing and mitigating the risks we accept and incur in our business.

The Board of the Firm decides the Firm’s risk appetite or tolerance for risks and ensures that the Firm has implemented an effective, ongoing risk management process, and maintain an appropriate risk management culture.

Risk within the Firm is managed by use of the following:

- An internal control framework to govern its processes and procedures, and to mitigate risks. Risks are recorded and quantified in the Firm’s Harms Register.
- Scenario analysis and stress tests on the most significant risk identified, they provide vital information of likely risk impact to the business and the Firm’s financial position.

As part of its ongoing risk assessment process the Firm has concluded that it requires to hold additional own funds of £32,000 to support its ongoing operations due to concentration risks.

Remuneration

A firm must establish, implement and maintain remuneration policies, procedures and practices that are consistent with and promote sound and effective risk management. If a firm’s remuneration policy is not aligned with effective risk management, it is likely that employees will have incentives to act in ways that might undermine effective risk management.

The requirements of the MIFIDPRU Remuneration Code are separated into 3 categories. The extent to which the requirements apply to a firm depends on how that firm is categorised, as well as whether certain financial thresholds are exceeded. The FCA categorises investment firms as either:

‘SNIs’ – small and non-interconnected firms that meet specific criteria; or

‘non-SNIs’ – firms that do not meet the SNI criteria.

SNI firms are only required to comply with a small number of remuneration rules, referred to as the ‘basic remuneration requirements’.

ODAM is a SNI firm.

Remuneration policy

FCA investment firms are required to implement and operate a remuneration policy for all staff, which should cover all components of remuneration covered in the MIFIDPRU Remuneration Code. ODA’s remuneration policy is:

- proportionate to the nature, scale and complexity of the risks inherent in the Firm’s business model and activities;
- gender-neutral;
- consistent with and promotes sound and effective risk management;
- in line with the Firm’s business strategy and objectives;
- takes into account long term effects of investment decisions taken; and
- contain measures to avoid conflicts of interest, encourages responsible business conduct and promotes risk awareness and prudent risk-taking.

Governance and oversight

ODAM’s management body periodically review the remuneration policy and the policy makes a clear distinction between the criteria applied to determine fixed and variable remuneration. The fixed and variable components of remuneration is appropriately balanced, and fixed pay represents a sufficiently high proportion of total remuneration. Variable remuneration does not affect the Firm’s ability to ensure a sound capital base and when assessing individual performance, both financial and non-financial criteria is taken into account.