

**MIFIDPRU Public Disclosure Document**

**Northlander Commodity Advisors LLP**

**Date of preparation: April 2025**

**For the period 1-Jan 2025 - 31-Dec 2025**

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## **1 Overview and summary**

Northlander Commodity Advisors LLP (“Firm”, “Northlander”) is regulated by the Financial Conduct Authority (“FCA”) as a Markets in Financial Instruments (“MiFID”) firm and 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 covering the financial period 1 Jan 2024-31 Dec 2024.

The Firm’s main business activity is an investment manager to Fund Pools and Segregated Managed Accounts (“SMA”). The Fund Pools are established externally and open to an outside investor, which is categorised as Alternative Investment Funds (AIF) under the Alternative Investment Fund Managed Directive (AIFMD).

## **2 Risk management objectives and policies**

The Firm has implemented and embedded risk management framework, policies and procedures across all relevant risk areas of the Firm. The Management Board sets the business strategy and risk appetite statement of the Firm, which flows through to the risk management framework implementation across the Firm.

In line with the Firm’s business strategy, risk appetite and risk management framework the Firm identifies and further assesses key risks within the Firm’s Internal Capital and Risk Assessment (“ICARA”) process.

The Firm maintains a risk register, which includes risk assessment in accordance with its internal and external risk exposure. Key risks are reported to the Management Board at the respective meeting.

### **2.1 Own funds requirements – MIFIDPRU 4**

As an SNI firm without permissions for dealing as principle 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.

## 2.2 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.

## 2.3 Liquidity – MIFIDPRU 6

The Firm maintains minimum liquidity at all times in compliance with the Basic Liquid Asset Requirement (BLAR), being at least 1/3 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.

## 3 Own funds Requirement

The Firm calculates its own funds requirements as an SNI firm in line with the rules and requirements in MIFIDPRU 4.3 for SNI firms.

<b>Own Fund Threshold Requirement (OFTR)</b>			
<b>Minimum Own Funds Requirement</b>			
A	Permanent Minimum Requirement ("PMR")	£	75,000
B	Fixed Overhead Requirement ("FOR")	£	373,493
C	<b>Minimum Own Funds Requirement (higher of (A) and (B))</b>	£	<b>373,493</b>
<b>AIFMD Capital Requirements</b>			
<b>Minimum AIFMD Capital Requirement</b>			
A	AIFMD Base Capital Requirement	£	103,312.50
B	Fixed Overhead Requirement	£	373,493.45
C	Funds Under Management Requirement	£	-
D	PLUS PII Requirement - 1bsp of Own Fund Requirements	£	832.45
	<b>AIFMD Capital Requirement (higher of (A), (B) and (C)) + (D)</b>	£	<b>374,325.90</b>
<b>Regulatory Capital</b>		£	374,326
<b>Surplus</b>		£	<b>491,542</b>
<b>Firm Capital Requirement</b>		£	<b>374,326</b>

In addition, the Firm has completed its ICARA and analysis to determine its net wind-down requirements and any additional own fund requirements to fund its on-going operations.

The Firm's risk appetite statement and assessment of risks through its risk management framework and risk register form the basis of its ICARA and assessment of the overall financial adequacy rule in line with MIFIDPRU 7.4.7.

The Management Board reviews, challenges and approves the ICARA and conclusions of own funds requirements.

## 4 Remuneration arrangements

The Firm has adopted a remuneration policy and procedures that comply with the requirements of chapter 19B and 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 Management Board, as the Remuneration Committee, 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.

Northlander's Remuneration Policy 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 Firm's annual performance and staff members performance or, in exceptional cases, other conditions.

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 contribution to the Firm's performance.

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.

The Firm monitors fixed to variable compensation to ensure the SYSC rules around remuneration regarding AIFMD business (19B) and MiFID business (19G) is adhered to with respect to Total Remuneration.

### Quantitative Remuneration

All firms are required to publicly disclose certain quantitative information in relation to the levels of remuneration awarded. As an SNI firm and in accordance with MIFIDPRU 8.6.8, Northlander 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 December 2024:

Total fixed salaried remuneration awarded £298,261  
Total variable salaried remuneration awarded £0  
Total salaried remuneration awarded £298,261