

# OLD PARK LANE CAPITAL PLC<sup>+</sup>

## **Treating Customers Fairly**

The board and staff are committed to acting in the best interests of our customers at all times. Treating our Customers Fairly and placing your interests first is foremost in our minds and in what we do at all times.

Old Park Lane Capital plc [OPL], has in place systems and controls to ensure our customers are treated fairly. All OPL customers [unless otherwise notified] have been categorised as “Retail” customers. As a result of being categorised as retail you receive the highest of protections available from our regulator in the event of our default.

In our dealings with you, we are committed to acting in the best interests of our clients at all times by;

- Assuring to you that fair treatment of our customers is embedded in our corporate culture.
- Placing your interests first
- Being open and transparent
- Communicating clearly
- Notifying you in advance of any charges
- Handling complaints promptly and fairly
- Ensuring staff are polite and adequately trained

Supporting Policies;

- **Order Execution Policy**  
Detailed in our Terms of Business – striving to obtain the best possible outcome for our client’s when executing or receiving orders.
- **Conflicts of Interest**  
Our list of conflicts is reviewed and updated regularly. Mitigation of any conflict is listed. The list is available on request.
- **Data Protection**  
We are registered with the Information Commissioners Office and all staff are aware of the proper custody of sensitive client data.
- **Personal Account Dealing**  
All personal deals executed by Staff and Account Executives are monitored to reduce the risk of any conflict with clients.
- **Gifts & Inducements**  
A record is kept of any gift which is reviewed to ensure there is no conflict with duties owed by the company.
- **Chinese Walls**  
A Chinese Wall exists between our Corporate Broking and Stockbroking. This means that information can be withheld or not acted upon and that one part of the business may be kept unaware of certain information held in other parts of the firm.

### **Old Park Lane Capital plc**

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W: [www.oldplc.com](http://www.oldplc.com)

Old Park Lane Capital Plc is a member of the London Stock Exchange  
and Authorised and Regulated by the Financial Services Authority (Firm no. 477870).  
Registered in England no. 06440879. Registered Office: 49 Berkeley Square, London W1J 5AZ

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- **Research**  
All research is reviewed ahead of its publication to ensure it is fair clear and not misleading. Where any conflict exists this is clearly disclosed.
- **Complaints**  
All complaints are dealt with by our compliance officer who to ensure impartiality acts on an independent basis. Any complaint is dealt with promptly and fairly in line with our complaint policy. We will endeavour to put things right, where we are wrong.
- **Training & Competence**  
Staff and Account Executives receive regular training to ensure they are competent and have the right skills and knowledge to carry out their jobs effectively.
- **Suitability**  
Engage in active consultation with you to fully understand your needs and objectives to ensure the suitability of any recommendation.

Treating Customers Fairly is the responsibility of the whole firm it is reviewed along with our other policies and procedures as part of our Monitoring Program. If you are unsure or wish to seek clarification of any comment or item in our documentation then please feel free to contact us.

We are constantly measuring the effectiveness of our treating customers fairly policy by analysing Management Information and from all other areas of our business. We would welcome your comments and encourage you to contact us so that we can improve the service we offer you.

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