

Code of Practice - Sales and marketing of fixed-line telephone services

Introduction and overview

The purpose of our Code of Practice is:

To show that XLN Telecom Ltd. (“our”, “us”, and “we” refer to XLN Telecom Ltd.) adopts responsible selling techniques when marketing our fixed line-telecommunications services (“services”);

- To help our customers and potential customers understand our services and the behaviour to be expected from our representatives;
- To show that we provide our customers with higher standards of protection than consumer law requires; and
- To set out clearly what is good practice in the sales and marketing of our services, as reassurance to our customers.

The code applies to the sales and marketing of our services to domestic and small business customers (“you” and “your” refer to customers) and covers all aspects of the sales process. We aim to avoid mis-selling and misrepresentation and to ensure that you fully understand the services and the terms of the contracts we offer you.

All our sales and marketing staff, sub-contractors and agents are briefed on this code and we routinely monitor compliance with it. If you feel that any representative of XLN Telecom Ltd has breached the terms of the code, please report your concerns to Saeed Sheikh, who has responsibility for compliance with this code, and for handling associated complaints.

Mr. Saeed Sheikh Compliance Manager

S.Sheikh@xlntelecom.co.uk

For any queries about our Code of Practice do not hesitate to contact us.

Copies of this code are available free of charge in various formats on request, including via our website www.xln.co.uk. The code has been prepared in line with guidelines published by Ofcom, the industry regulator, on 13 April 2005.

Sales, marketing, advertising and promotional activity

We make customers aware of and promote our services by various methods. In all cases, we act responsibly and try to comply with relevant legislation.

We will respect your wishes if you have registered with any relevant preference service, including the Mailing Preference Service, the Telephone Preference Service, the Fax Preference Service and the email Preference Service.

All our advertising and promotion activity keeps to the principles of the British Codes of Advertising and Sales Promotion. In addition, we ensure that advertising and promotional literature is clear, unambiguous, accurate and fair, does not contain false or misleading information about price, value or service and does not denigrate other companies.

Recruitment and sales training

To ensure that our employees act responsibly at all times, we follow strict procedures in the selection and training of staff that have direct sales and marketing contact with customers. We also ensure, to the best of our ability, that all our sub-contractors and agents use equivalent selection and training procedures and remuneration (payment) systems.

When recruiting new sales staff we take up references and carry out relevant background checks. We also consider whether applicants are suitable for this type of work, recognising that our sales people will be seen as the 'public face' of our company and the industry in general. We encourage our sub-contractors and agents to do the same.

We train our sales and marketing employees, our sub-contractors and agents to ensure they have a good understanding of our services and of industry practice generally and do not give our customers inaccurate or misleading advice.

We also ensure that our sales staff, our sub-contractors and agents are familiar with the relevant aspects of consumer protection law, the content and interpretation of this code and the benefits it provides to customers.

Our remuneration systems for all sales and marketing personnel, sub-contractors and agents are designed to discourage misleading or exploitative sales practices.

Customer contact

Our sales staffs are given clear guidelines on contacting residential customers at home, particularly during the hours of darkness. They must not visit you before 8am or after 8pm, and must not telephone before 8am or after 9pm, unless you ask them to.

Representatives involved in face-to-face sales and marketing have identity cards or badges that clearly display our company name and the representative's own identification number. The identity badge also displays the representative's name and photograph and a date showing the validity of the card. Information on the card is clear and easy to read without close examination.

On making contact, our representatives will immediately identify themselves, state our company name, the purpose of the call and how long it should take. If visiting or meeting in person, they will show you their identity card.

Our representatives are trained to be courteous, to use appropriate language and to offer clear and straightforward explanations. They must offer only factual and accurate information about our services and contracts and must not misrepresent our services or those of other companies. They must check that if you enter into a contract you fully understand the terms and are sure that this is what you want to do.

Our representatives will cease contact with anyone who indicates that the contact is inconvenient, unwelcome, inappropriate or too long. At your request, the discussion will be ended immediately and, if making a doorstep call, the representative will leave your premises immediately.

Our representatives will not abuse the trust of vulnerable customers, for example people who are elderly or who have special needs, or whose first language is not English.

When visiting sheltered housing, nursing homes or residential care facilities, our representatives will make contact with the warden or other person in authority before approaching a customer.

We will not aim sales or marketing activity at people who are under the legal age for entering into contracts.

To ensure we maintain these standards, we keep the records of our sales and marketing activity for at least six months. Records include the date of the contact with you. To help us deal with any complaints or queries, all such records clearly identify the salesperson(s) that made the call or visit.

Entering into a contract

We check that the person entering into a contract with us is authorised to do so and be responsible for bills at the premises in question.

Our order/ contract forms and telephone scripts are designed to ensure that you understand that you are entering a contract, and each document states this immediately next to where you sign.

You have the right to change your mind during the switchover period and that there is no cost for cancellation during this period.

In all cases we will give you the following information:

- Confirmation of our company's identity and full contact details;
- A description of the service you have chosen, the cost and payment terms;
- Arrangements for providing the service, including how we deal with the order and, as accurately as possible, when it is likely to start;
- Your right to cancel and how to use it;
- How long the charges will remain valid; and
- The minimum period of contract, and minimum contract charges, if any.

Our representatives have a full summary of our tariffs, which you can ask to see.

Where our representative meets you in person, they will give you the information in writing. When you sign an order form, or enter into a written contract, you will also get a copy of the order form or contract, as well as information about any after-sales services or guarantees and arrangements for ending the contract.

You will get this information at the same time as you sign, or within 5 working days, unless you received it in writing before signing the contract.

Orders placed with us by distance-selling methods (such as phone, fax or internet) comply with distance-selling regulations. As with order forms, our telephone scripts are designed to ensure that you understand that you are entering into a contract and will be sent the information detailed above.

In the case of internet orders, a well signposted and easy-to-see hyperlink to this information is prominently displayed and the information is readily available for downloading and printing.

Regardless of our method of selling, you may cancel orders and end contracts by telephone, in writing, by fax or by email to:

- Tel - Customer service: **0800 652 2530**
- Fax - **020 7793 5549**
- Email - **service@xlntelecom.co.uk**

If you wish to find details of your nearest Citizens Advice Bureau or Trading Standards department you can search on the following websites:

Citizens Advice - **www.citizensadvice.org.uk**