

Weston Communications Limited

Sales and Marketing Code of Practice

Introduction

Weston Communications Limited has produced this code of practice in line with OFCOM regulations introduced on 26th May 2005. Weston Communications Limited is a responsible company and recognises all legislative and regulatory compliance issues, in conjunction with its internal compliance controls.

The purpose of this code of practice is to ensure that Weston Communications Limited resolves any issues, which may arise before, during, and after the point of sale. Weston Communications Limited ensures that all customers entering into an agreement with Weston Communications Limited fully understand the nature of the Fixed Line Telecommunication Agreement and intend to proceed with the transfer. Weston Communications Limited does not accept any forms of mis-selling or misrepresentation from anyone representing the company.

All representatives of Weston Communications Limited, regardless of their position or job description are made aware of the existence of the code of practice and informed of the contents of the code. Through management structures, representatives of Weston Communications Limited will be monitored and reviewed for their compliance with the code.

Weston Communications Limited ensures that we provide our customers with standards of protection over and above those provided by law. We also ensure good practice and responsible selling.

It is the intention of Weston Communications Limited to provide a clear and accurate picture of the operation of Weston Communications Limited, providing reassurance to customers as to what constitutes good practice in the Fixed-line Telecommunications Industry.

Weston Communications Limited's Sales and Marketing Code of Practice is available on the company's website in PDF format and is available to customers in documented format upon request, free of charge.

The person responsible for compliance with the code within Weston Communications Limited is Philip Beasley, who can be contacted by writing to Philip Beasley, Sales Manager, Weston Communications Limited, Networks House, 2 Whitehall Estate, Whitehall Road, Leeds, LS12 5JB or by emailing philipbeasley@thewestongroup.co.uk or by telephoning 0870 753 1040.

Status of Code

Weston Communications Limited complies with the provisions of this code under the guidelines and regulations applied by OFCOM, however, non-compliance with this code does not affect the validity of any contract, whether verbally agreed or signed, between Weston Communications Limited and the customer, unless otherwise provided by law. The provisions of this code only apply to customers, as defined within the Communications Act 2003, and do not apply to all businesses.

Sales, Marketing, Advertising and Promotion

Weston Communications Limited approaches potential customers in a number of different ways, including by post, by telephone and in person.

Customers' legal rights regarding Telephone Preference Service (TPS), Mail Preference Service (MPS), Facsimile Preference Service (FPS) and E-mail Preference Service (EPS) are respected and data used to contact customers is screened regularly.

Weston Communications Limited ensures that its advertising and campaign literature is regularly updated and is clear, concise, unambiguous, accurate and fair, and contains no false or misleading information regarding prices, savings, or benefits, of any products or services offered by Weston Communications Limited, or any of its competitors.

Recruitment and Sales Training

Weston Communications Limited recruits its sales and marketing staff and third party agencies on the basis that our sales and marketing representatives are the voice and face of Weston Communications Limited and the initial contact that its customer will receive. We believe that first impressions are the ones that last. Weston Communications Limited will not tolerate any behaviour from any of our sales and marketing staff or third party agencies, which brings the good name of Weston Communications Limited into disrepute.

All prospective sales and marketing staff have background checks carried out into previous employment position and any evidence of mis-selling or lack of integrity and any criminal convictions are taken into account.

All successful applicants complete training courses to ensure:

- A complete and accurate understanding of the Weston Communications Limited Fixed Line Telecommunication package.
- Awareness of the courteous behaviour and integrity expected of them at all times.
- Awareness of the code of practice and its contents, and their responsibility to comply with the code at all times.
- The complete awareness that mis-selling, misrepresentations, and disrespectful behaviour will not be tolerated and any allegations made will be fully investigated in line with the company's code of conduct and its internal disciplinary procedures.

Weston Communications Limited also requires all of its representatives to maintain a high level of personal standards, in appearance, manner, and conduct.

Weston Communications Limited has in place a management structure, which is fully responsible for the actions and conduct of its representatives and their compliance with the code of practice. Any allegations of misrepresentation of mis-selling against any member of Weston Communications Limited sales teams should be reported to Philip Beasley, Sales Manager, Weston Communications Limited, Networks House, 2 Whitehall Estate, Whitehall Road, Leeds, LS12 5JB.

We also have stringent checks to ensure that each employee recruited by Weston Communications Limited is identified by providing his or her NI number and an authorised proof of address. Weston Communications Limited also requests that two independent references are provided from different former employers, to ensure there has been no previous history of sales related misconduct. Weston Communications Limited conducts regular assessments of office based and field sales staff and continuously monitors their performance. Weston Communications Limited will make all reasonable endeavours to retrieve all company literature, paperwork and identification badges from any representative leaving the company.

As part of the sales training for new and existing sales representatives, Weston Communications Limited provides a sufficient understanding into the process of ordering the telecommunication service. Weston Communications Limited recognises the consumer protection laws and provides an awareness of these laws to its representatives. As part of the training course Weston Communications Limited ensures its representatives are fully aware of the

contract, the duration of supply, the terms and conditions of supply, and any termination fees applicable for the early termination of the agreement. They are also trained in the correct procedure for the cancellation of customer agreements.

Weston Communications Limited document all remuneration systems, which are designed in a manner to encourage responsible sales practice.

Customer Contact

Weston Communications Limited does not visit customers outside the hours of 08.00 to 20.00 and does not make telephone calls outside the hours of 08.00 to 21.00, unless the customer's request.

Each representative of Weston Communications Limited involved in face-to-face contact with customers is issued with a company identification card, which clearly displays the representative's details, name and telephone number. Upon arrival at an appointment, the representative will immediately identify himself or herself as a representative of Weston Communications Limited, show the customer the identification card, and advise the customer of the expected duration of the meeting. Customers are welcomed to contact the Head Office of Weston Communications Limited to confirm the identity of the representative attending the premises, if they so wish.

Weston Communications Limited takes pride in its good reputation and expects its staff:

- To be courteous and professional at all times.
- To be factual and accurate.
- To be able to explain the products and services provided by Weston Communications Limited.
- To be aware of the sales and marketing code of practice.
- Not to misrepresent any services offered by other service providers.

If any contact with a customer is inconvenient or unwelcome, discussions will be ceased immediately. Any customer who wishes to have no further contact from Weston Communications Limited can request the removal of their details from our marketing database by writing to: Weston Communications Limited, Networks House, 2 Whitehall Estate, Whitehall Road, Leeds, LS12 5JB.

Weston Communications Limited will not direct its marketing activities to those who are under the legal age of entitlement to enter into a contract and will not abuse the trust of vulnerable customers.

Weston Communications Limited retains the records of all customer contacts for a period of not less than 6 months and all information, including the sales person's details, are recorded on our database.

Entering into a Contract – Information, Order Forms and Contracts

Weston Communications Limited takes all reasonable steps to ensure the person agreeing to the contract is authorised to enter into an agreement for telecommunication services on behalf of the customer.

Weston Communications Limited has designed all of its contractual documentation in a specific manner to ensure that the contractual nature of the document is clear and concise. The declaration statement is adjacent to where the customer signs their acceptance. The features of the contract are clearly stated on the front of the agreement, with the terms and conditions on the reverse.

The Weston Communications Limited contracts are set out in such a format, which provides the customer with an overview of the contract and general terms of supply. It is the customer's responsibility to review the contract and its terms and conditions, and ask questions regarding any aspects of which they are unclear, prior to their acceptance of the contract. The below features appear clearly on the contract:

- Contact details for the Company, including its postal address, telephone number, facsimile number, email address, and website address.
- Minimum period of supply.
- Features of Service, including charges for local and national calls, discounts off BT standard business rates, and reference to pricing sheets.
- Payment terms.
- Termination procedures and fees, which may be applicable.
- Customer Service opening hours.

Weston Communications Limited provides all customers with a pricing sheet, which lists all of the charges for line rental, network features, local and national calls, mobile calls, international calls, directory enquiry calls and non-geographic calls.

Weston Communications Limited offers all customers, as defined within the Communications Act 2003 (i.e. not all businesses), a consolidation period. All customers are made aware of this period. No cost will be applied for accepted cancellations during this period. Request for cancellation should be made by telephone to the customer service department on 0870 753 1040, by writing to Customer Services, Weston Communications Limited, Networks House, 2 Whitehall Estate, Whitehall Road, Leeds, LS12 5JB, by facsimile to 0870 753 1050 or by email to info@thewestongroup.co.uk

Cancellations requests outside of this period will be referred to the terms and conditions, of the customers' contracts.

All Weston Communications Limited customers will receive a minimum of two letters prior to the commencement of switchover and one further letter after the switchover has commenced. All letters contain contact details for our customer services department, including the full postal address, telephone number, facsimile number, and email address.

Audits

Weston Communications Limited will carry out regular checks on all aspects of the training of sales and marketing staff, company documentation, and the procedures involved. We will also carry out checks on a regular basis of all correspondence and information provided to customers by Weston Communications Limited. Weston Communications Limited will ensure that we are acting compliantly with all aspects of this code.

Our customer contracts are stringently checked upon receipt to ensure that the paperwork has been completed correctly, that all documents have been signed by the customer, and that no unauthorised amendments have been written on any contractual documents, by either the company representative or the customer. If any unauthorised amendments are found on any contractual documents then we will reject these contracts and the relevant sales department will be informed.

Customer Complaints Procedure

Any customer complaints relating to our sales and marketing procedures should be made in the first instance to Philip Beasley, Sales Manager, Weston Communications Limited, Networks House, 2 Whitehall Estate, Whitehall Road, Leeds, LS12 5JB. An internal investigation will be conducted and we aim to provide a resolution to the customer within 28 days.

If the customer believes that their complaint has not been dealt with satisfactorily then they should then write to The Managing Director, Weston Communications Limited, Networks House, 2 Whitehall Estate, Whitehall Road, Leeds, LS12 5JB. The Managing Director will endeavour to provide a resolution to the customer within 28 days.

All complaints against our sales and marketing staff, which are upheld, will be drawn to the attention of the Managing Director for internal disciplinary action.

Distributing the Code: Creating Awareness

Weston Communications Limited has taken steps to advise all members of staff, regardless of their position within Weston Communications Limited, of the existence of the Code of Practice. This code is available via the company internal intranet and is referred to on the company's website. The code is also available to customers upon request, free of charge.