

Code of Conduct

Introduction to our company and services

Gateway Telecom Ltd is an independent company that delivers communications services to business customers. Whilst we may not provide all the component parts of our services ourselves we do take the responsibility for the services delivered to you and will liaise with our suppliers to ensure that any problems with their services are resolved promptly.

Purpose of this Code of Practice

The Code informs you about our products, services, and customer care policies. We have prepared it in line with guidance published by Oftel (the regulator, which is now Ofcom) on 15 August 2003.

How to contact us

Please contact our Customer Service Team

By phone: 0800 083 45 83 - 24 hour customer care line including bank holidays (If all lines are busy, please leave a message, we aim to respond within 1 hour.

By e-mail: customerservices@gatewaytelecom.co.uk

By fax: 0870 200 300 9

By post: Gateway Telecom Ltd, Ephraim Phillips House, Bissell Street, Birmingham, B5 7HP

Our commitment to you

We are committed to providing you with the highest quality of customer service. When we purchase our services from wholesale provider(s), we choose those providers carefully to ensure that you receive a high quality service. We make every reasonable effort to supply services that satisfy your requirements. We work to all relevant laws and regulations.

Our products and services

- » Landline calls using BT and alternative Tier One Networks
- » CPS-Carrier Pre-Selection – Reduced call charges
- » ISDN-digital telephone lines and standard PSTN lines
- » Broadband access
- » Internet start-up packages with pop3 e-mail
- » Mobile phones and data services
- » Non-geographic services (0800, 0845 and 0870 Numbers)

For more details on any of our products and services, or to place an order immediately, please contact our Customer Service Team on **0800 083 4583**.

Marketing

We work to the principles within the British Code of Advertising, Sales Promotion and Direct Marketing, which may be found on the website, www.cap.org.uk.

Terms and Conditions

When you subscribe to a service from Gateway Telecom Ltd, we will send you our Standard Terms and Conditions and ask you to sign a contract. You may also download our standard terms and conditions from our website. If you have any questions, please phone our Customer Service Team on **0800 083 4583**. We may carry out a credit check as part of our assessment procedures.

The minimum contract term for our services is 12 months. We aim to provide services within 24 hours for Non Geographic Numbers and 5 working days for IVR (Interactive Voice Response) services from the time of your original request, subject to the availability and installation of any equipment and, where appropriate, lines to your premises. If we need to carry out a survey of your premises or lay additional cabling we will advise you of the revised timescales as soon as we can.

Cancellation

If you decide to cancel your order or agreement before we have provided the services, you may do so without charge within 7 days after your order is placed. After 7 days we will charge you an administration fee equivalent to one month's rental of the appropriate product. Should you wish to terminate your contract within the minimum term of 12 months we will make a charge – please refer our terms and conditions for

details. After the minimum term you can cancel any service by writing to us at our address above giving us 1 month's written notice.

Faults and repairs

Please call our 24 hour Fault Line on **0800 083 4583** if you experience a fault with any of our services. We aim to have this investigated and in some cases (depending on the nature of the fault) repaired within 1 working day.

Compensation and refund policy

Our policy with regard to compensation is to review each case on its merits. As for refunds, if a customer has overpaid within the terms of their contract then this will be refunded.

Price lists

Our pricing structure is available from our Customer Service Team on **0800 083 4583** and on our website. We will write to you in advance if we change the pricing structure on your products and services.

Billing

We will bill you monthly. Our payment terms are by direct debit and this is a fundamental term of your contract with us. We provide itemised bills as part of our service to you. If you have difficulty paying your bill, please contact us on **0800 083 4583** at the earliest opportunity. We will do all we can to help our small business customers to manage their bills and avoid disconnection.

If you are moving home or office

Please call our Customer Service Team on **0800 083 4583** no later than 28 days before your move date. We will amend your account and billing requirements as necessary.

Number porting (if applicable)

Gateway Telecom Ltd recognise that keeping your existing telephone numbers may be important to you. If you move we will endeavour to offer you the same telephone number to minimise disruption. We will work with you to ensure that the services are switched over at a convenient and appropriate time.

For more information, please call our Customer Service Team on **0800 083 4583**

Complaints

We take customer complaints very seriously and we aim to resolve them quickly and efficiently. If you have a complaint about any part of our service, please contact our Customer Service Team on **0800 083 4583**. We will try to resolve your complaint quickly and efficiently, and to keep you informed at all times.

If we cannot settle a complaint to your satisfaction, you may ask for help from the Office of The Telecommunications Ombudsman (Otel), of which we are members.

Please visit www.otelo.org.uk for further details. For more information on our complaints procedures, please ask us for a copy of our Code of Practice for Complaint Handling.

Alternative Dispute Resolution

If a dispute cannot be settled within 12 weeks, we will notify you that deadlock has been reached. If the dispute advances to this stage, Otel should be contacted, who have authority to handle disputes and make final judgements. We will comply and follow all decisions made by Otel as full and final.

Statement of social responsibility

We take the problem of nuisance calls and malicious communications very seriously. We tackle it by working closely with the police and others in the communications industry. If you have been a victim of this activity, please call the Customer Service Team on **0800 083 4583** to report the incident, and for information on how to deal with this situation.

We encourage parents to register the mobile phone of their children, and take responsibility for all customer care enquiries.

Services for people with special needs

We are committed to helping all our customers to communicate easily. We offer the following additional services for customer who are older or who may have a disability, including:

- Priority access to the Customer Service Team
- 24 hour freephone customer service line
- Priority fault repair and assistance
- Additional help and support if you have difficulty paying your bill

Copies of this Code are available in larger print and other formats on request.

Data protection

We are registered with the Information Commissioner's Office to hold information necessary to supply services to our customer, in compliance with the Data Protection Act 1998.

Other

We regularly review our Code of Practice to ensure we are in full compliance with all industry regulations and guidelines, and to guarantee quality of service to all of our customers.

Useful addresses

Gateway Telecom Ltd:

Ephraim Phillips House,
Bissell Street,
Birmingham B5 7HP.

Tel: 0800 083 45 83

Fax: 0870 200 3009

The Office of the Telecommunications Ombudsman:

Wilderspool Park,
Greenall's Avenue,
Warrington, WA4 6HL.

Tel: 0845 050 1614.

Fax: 0845 050 1615

Ofcom:

Riverside House,
2A Southwark Bridge Road,
London SE1 9HA.

Tel: 020 7981 3000

Federation of Communication Services Limited (FCS):

Burnhill Business Centre,
Provident House,
Burrell Row,
Beckenham,
Kent BR3 1AT.

Tel: 020 8249 6363.

Web: www.fcs.org.uk

Gateway Telecom Ltd Sales & Marketing Code of Practice

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Purpose of this Code of Practice

The Code sets out guidelines on the way we conduct ourselves with regards to all forms of sales and marketing activity, in accordance with OfCom requirements.

How to contact us

Please contact our Customer Service Team, of whom Mr Ansar Mahmood takes overall responsibility, by any of the following methods:

- » By phone: 0800 083 45 83 - 24 hour customer care line including bank holidays
(If all lines are busy, please leave a message, we aim to respond within 1 hour).
- » **By e-mail:** customerservices@gatewaytelecom.co.uk
- » **By fax:** 0870 200 300 9

» **By post:** Gateway Telecom Ltd, Ephraim Phillips House, Bissell Street, Birmingham B57HP

Our commitment to you

We are committed to acting honestly, truthfully and lawfully at all times. We take active measures to ensure all staff, in particular sales staff, are fully aware of how they must behave, both in terms of the law as well as maintaining our own high levels of customer service. All sales and marketing literature is scrutinised to ensure accuracy and clarity for recipients.

We take full responsibility for the conduct and behaviour of our sales staff and agents. They are supervised and managed by Mr Rob Nawaz who handles all complaints relating to sales staff.

Our products and services

- » Landline calls using BT and alternative Tier One Networks
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- » Broadband access
- » Internet start-up packages with pop3 e-mail
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For more details on any of our products and services, or to place an order immediately, please contact our Customer Service Team on 0800 083 45 83

Sales Staff Recruitment and Training

The recruitment of sales staff follows internal company procedures that identify those individuals who will conduct themselves in a professional, honest manner at all times. Candidates are required to submit their CV, attend interview and undergo regular training programmes.

New employees are questioned and measured against a number of factors, including their experience, skills, attitude, appearance, qualifications, convictions and overall presentation. Proof of identification and references are required before employment can commence.

Telephone sales staff are routinely monitored to guarantee quality levels are maintained, whilst field staff are required to submit details of every appointment they attend, whilst also being accompanied on appointments at various times throughout the term of their employment.

Formal training programmes include, but is not limited to, market analysis, product training, sales techniques, industry processes & timescales, competitor analysis, role and responsibilities, technical support and after-sales service.

Mis-selling

The problem of mis-selling is highlighted early in the training programme, making everyone aware of the problems it causes the company, customers and the industry as a whole. Clear reference is made to internal disciplinary procedures that would be enforced for reported cases of mis-selling.

Remuneration & Earnings

Our remuneration package for sales staff is targeted towards ongoing rewards from satisfied customers. Staff are paid a percentage of the customers' bills throughout the term of their agreement, thereby encouraging the highest levels of customer satisfaction.

Telephone Preference Service

When contacting potential customers we use a database that screens against the Telephone Preference Service List, respecting organisations' wishes not to be contacted.

It is company policy to not send marketing communications via fax to customers unless requested. Emails are sent only to existing customers, who can unsubscribe at any time, should they wish to do so.

Marketing

All marketing material is produced by our Marketing Executive, Emi Martin. Material is proof-read in-house by a senior member of staff before publication, to eradicate any unintentional discrepancies that may occur. We work to the principles within the British Code of Advertising, Sales Promotion and Direct Marketing, which may be found on the website, www.cap.org.uk

Information is presented in clear basic English that is unambiguous, honest and truthful. Competitors or any other organisation are never referenced to in a negative way.

Marketing material is kept on file for a minimum of 12 months.

Industry standards

At all times we make all efforts to adhere to standard industry practices in relation to fixed-line services, as set out by OfCom. Further details can be found by referring to our main Consumer Code of Conduct, which can be found at www.gatewaytelecom.co.uk

Auditing Procedures for order-taking

Strict guidelines are followed for every order processed through the company. Once a completed order form is sent to the office a quality check is carried out to confirm details are correct and the customer is happy to proceed with the agreement. This includes clarification that the customer is entering a 12-month agreement. All technical details are also confirmed before the order is processed to the next stage.

This quality check is executed in the form of a telephone call, and a welcome letter is also sent as written confirmation of the order.

Sales representatives are also given clear instructions that they must explain all sections of the order form to ensure full understanding at all times.

Sales training covers the problems of mis-selling, slamming and any other dishonest or misleading behaviour.

Order-taking processes are regularly monitored to identify and respond to potential problems, with remedial action undertaken as and when required.

Sales Process & Procedures

During sales training there is specific emphasis on standard sales procedures, including the information that must be presented to potential new customers that will ensure full understanding of any agreement they sign up to.

Staff are given a copy of our Consumer Code of Conduct, as well as this document, to guarantee complete understanding. Similarly, a thorough analysis of our standard Terms and Conditions is also undertaken. It is made clear that all sales staff are expected to explain the major details of the Terms and Conditions and guarantee customers are left with a full copy for their own records.

Customer Contact

As a business-to-business organisation, sales staff only operate during normal working hours. They are provided with identification and sales literature that clearly indicates who they are and who they represent.

Upon making contact with customers all staff are instructed to introduce themselves in a polite, professional manner. If a customer is unavailable at that time at no point will the salesperson attempt to insist on seeing them, instead requesting a mutually agreeable re-scheduling.

Availability

All Terms and Conditions, the Consumer Code of Conduct and Sales and Marketing Code of Conduct is available to customers free of charge, upon request. Our Terms and Conditions and Consumer Code can also be found on our website, www.gatewaytelecom.co.uk

Entering into a contract

All orders must be completed and signed by the customer, who receives a copy of their own. Any other paperwork that requires a customer signature is completed before an account is activated. Clients may cancel an order within 7 days of placing it, without charge. Numerous quality checks are carried out, including contacting the customer before the account is activated, to verify details and confirm the customer is happy to proceed.

Contract order forms are clear and legible with a full explanation given by the salesperson present.

Rights of cancellation are explained and are also present in the Terms and Conditions, as well as the length of the agreement the customer is signing into. Details of call charges are also entered before the customer signs.

Once completed, three copies of the contract exist; one for the customer, one for the salesperson and the other for our files. Customers are reminded that it is important for them to retain their copy for possible future reference.

Upon signing a contract customers are sent details confirming their order, dates that their services will be activated and that they can cancel their order without charge should they wish to do so (for 7 days from signing the contract).

Complaints

A formal complaints procedure exists for customers who experience difficulties. Details of this procedure can be found on our Consumer Code of Conduct at www.gatewaytelecom.co.uk