

Sales and Marketing

of Carrier Pre-Select, Wholesale Line Rental, Local Loop Unbundling and CPS Telecommunications Services

1. The way we work

Introduction for small business customers

This document is our way of introducing ourselves and letting you know what to expect from Virgin Media Business when we work together. It's a two-part thing, really. First, there's what we have to do by law. Then, there's what we do to keep you happy and build a lasting business relationship. In other words, the extra mile!

Legal stuff first, then. Naturally, we will comply with all existing UK legislation as this affects good practice and responsible selling in the marketing of Carrier Pre-Select (CPS), Wholesale Line Rental (WLR) and Local Loop Unbundling (LLU) services. We'll also stick to Ofcom's 'Guidelines for Sales and Marketing Codes of Practice for Fixed-Line Telecoms Service' (April 2005). You should expect nothing less.

The extra mile is mainly about never forgetting that we're dealing with individuals. People. With their own expectations. Just because we're a business selling to other businesses, it doesn't mean we can forget our manners – or our values.

In this Code of Practice, we talk mainly about the way we'll work with you in selling and marketing our CPS/WLR/ LLU services – especially before, during and at the point of sale. We'll tell you how we stop our people mis-selling or misrepresenting what we offer, how we make sure you understand exactly what you're buying from us, and how we make the terms of our contracts absolutely clear.

Also, just so you know, our Managing Director, Business is our nominated person who is responsible for compliance with this code.

2. Selling: We keep it honest

Sales, marketing, advertising and promotion

We are in business to build relationships – not just close sales. So when it comes to sales, marketing, advertising and promotion, we will always do our best to bring your attention to the products and services you really need rather than just show you something we'd like to sell.

We like using a variety of ways to contact you – direct mail, telemarketing, online advertising and electronic mail to name a few. But however we get in touch, we'll always act responsibly and stick to the relevant Ofcom guidelines.

If you've registered with preference services like the Mailing Preference Service, the Telephone Preference Service, the Fax Preference Service or the Email Preference Service, we will respect your privacy 100%.

As well as being honest, we like being recognised as legal and decent too – so we make sure our advertising and promotion stays onside with the British Codes of Advertising and Sales Promotion, and all other applicable advertising codes. We also do our best to keep our advertising and promotional literature clear, unambiguous, accurate and fair. We don't use false or misleading information about price, value or service and, in particular, we don't bad-mouth other Providers. (Even if we secretly feel people might actually prefer to work with us instead!)

3. Our people: We're fussy!

Recruitment and sales training

Because we believe that business is all about the one- to-one, we want you to feel an immediate sense of trust when we

work together. So we're fussy about the way we recruit our staff and the way we choose business partners, including sub contractors like third party agencies.

That starts by always following current employment legislation, of course. We then take a very close look at the behaviour and appearance of our recruits, recognising that the sales function may be seen as the 'public face' of the company. References and relevant convictions for criminal offences are checked and taken into account. And we'll actively look for evidence of mis-selling or lack of integrity in any previous selling employment. We just don't agree with the practice, full stop.

Because we're selective, we tend to end up with the sort of people customers enjoy meeting and working with. We build on that, with training in general and, in particular, ensuring that our people do not mislead or mis-sell to customers in any way.

The way we pay our people is transparent and documented – another way of discouraging misleading or exploitative sales practices.

4. Meeting up: We make it hassle-free

Customer contact

We want you to like doing business with us. That starts with the simple step of recognition – so all our sales and marketing people get clear identification that

shows who they are and that they represent Virgin Media Business. They will introduce themselves straightaway as our representatives, let you know why they're calling and how much of your time they would like.

Because we recognise that it's important to our small business customers, we also try and make sure that we know about local authority programmes like the Local Distraction Burglary Initiative.

You'll find that we're friendly, helpful, use jargon-free language and give clear straightforward explanations. We'll be factual and accurate. Our people will not misrepresent the services being offered nor those of other Providers and they'll also check that customers entering into

contracts understand, and can commit to them.

If you're too busy, don't feel that this is the right time, or have any other reason for wanting to finish a conversation, we will leave you alone without question.

We do not take advantage of any form of vulnerability to make a sale – whether that means someone whose first language isn't English, someone who is elderly or someone who has special needs.

5. Contracts: We keep it clear and simple

Information, order forms and contracts

Good faith is the key to all our contracts. So we'll take all reasonable steps to ensure that the customer representative entering into a contract is authorised to enter into the contract for the Services/bills at the premises.

We design order forms and contract forms so it's immediately clear to you what they're for. Every document will contain a statement of its contractual nature next to where you sign it so the statement cannot easily be obscured or concealed.

Where a direct approach takes place, you will be given the following information, in writing, in a clear and comprehensible manner:

- The identity of Virgin Media Business
- Our address, telephone, fax and email contact details
- A description of the telephone service
- Information about the cost of any standing charges
- The payment terms, line rental, key call types and 'protected or special support' arrangements
- The arrangements for provision of the service, including the order process
- The likely date of provision.

Where there may be significant delay in the likely date of provision, you will be informed. We'll also let you know that you have a right of cancellation and we'll tell

you what the process is for doing that. We make it clear what period your charges are valid for, the minimum period of contract and, if there are any, the minimum contract charges.

We want you to know about the existence of this code, so you can see how we measure up to it. You can have a copy on request, for free.

We'll give you a copy of any order form or contract you sign, as well as the following details in writing either at the same time or within five working days, unless previously supplied in writing prior to contract: Information about any after-sales services or guarantees; and arrangements for the termination of the contract.

Orders placed by distance selling means will comply with Distance Selling Regulations.

For internet orders, we'll display a hyperlink to this information and make it easily visible on the website. We'll also make sure you can easily download and print all the information.

You can cancel at no cost during the switchover period if you change your mind. All our customers will be made aware that they have the right to change their mind during the switchover period.

You can cancel orders and terminate contracts by telephone, in writing, by fax or by email.

In line with the industry-agreed process, Virgin Media Business will write to you with details of the transfer including:

- date of notification
- CLI(s) affected
- date of switchover
- the sender's contact details for any queries.

Where you've contacted us online, and told us this is

how you prefer to be contacted, the above confirmation will be sent by email.

In all cases, we'll contact you along similar timescales to the industry-agreed process to confirm that you understand that you've entered into an agreement.

If you decide the contract wasn't understood or intended, or if the order was

confirmed before the end of the switchover period, and you decide to cancel, we'll terminate the contract without charge or other penalty.

6. Consumer protection: Respecting your rights

The way we work follows all the relevant legislation, including the Ofcom 'Guidelines for sales and marketing codes of practice for Fixed-line Telecoms Services'.

7. Audits: We check everything to keep you happy

We all know that relationships take work. To make sure ours stays on track, Virgin Media Business carry out regular audits. We check our systems, procedures and documentation to ensure that we continue to live up to what we say in this Code.

8. Complaints: If there's a problem, we sort it

Customer complaints procedure

If you're not happy about the way we're looking after you, we'd like the opportunity to sort it out quickly. We have set up a process for helping our customers with their issues, including those relating to our sales and marketing activities. The process includes access to the Ofcom-approved independent Communications and Internet Services Adjudication Scheme ('CISAS') if it's needed. We also liaise with Ofcom and the relevant consumer groups to monitor the number and nature of complaints under its code.

9. Distribution: We want everyone to know about this Code

The Code is available to Customers on request, free of charge, and in a reasonable range of formats.

A copy of this Code has been sent to the head office of Citizens Advice (address: Myddelton House, 115-123 Pentonville Road, London N1 9LZ), plus head offices of other relevant major advice agencies.

Thank you

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