

Codes Of Practice

Legal TX conforms to all the codes of practice within the telecommunications industry, and as a responsible company has in place a number of codes of practice outlining how we work.

Within this document:

- > Consumer Code of Practice
- > Code of Practice for Complaint Handling
- > Code of Practice for Sales and Marketing of Fixed-Line Telephone Services

Consumer Code of Practice

Introduction to our company and services

Legal TX is a company within the Midshire group of companies 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 Of tel (the regulator, which is now Ofcom) on 15 August 2003.

How to contact us

Please contact our Customer Service Team or your Account Manager:

By phone: 0800 652 9192 from 8:30am until 5:30pm Monday-Friday, excluding public holidays.

By e-mail: support@legaltx.co.uk

By fax: 0800 652 7970

By letter: Legal TX (Midshire Business Systems (Communications) Ltd.), Midshire House, 95-97 Cato Street, Nechells, Birmingham, B7 4TS

Or via our website www.legaltx.co.uk

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 get 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

- Single and Multiline Line Rentals
- Digital – ISDN2, ISDN30 and Highway Line Rentals
- Landline telephone calls
- CPS-Carrier Pre-Selection
- Broadband ADSL Lines
- Ethernet & Leased Line Solutions
- Voice Conferencing
- Mobile Voice & Data Solutions
- Telephone Systems & Switches

For more details on any of our products and services, or to place an order immediately, please contact our Customer Service Team on 0800 652 9192.

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. Our policies and practices also conform to OFCOM General Condition 24 ('GC24' - relating to the sales and marketing of fixed-line telecommunications services) and its accompanying guidance can be found here:

<http://stakeholders.ofcom.org.uk/binaries/telecoms/policy/narrowband/statement.pdf>

Terms and conditions

When you subscribe to a service from Legal TX, we will send you our Standard Terms and Conditions and ask you to sign a contract, if applicable. If you have any questions, please phone our Customer Service Team on 0800 652 9192. We may carry out a credit check as part of our assessment procedures.

If applicable, the minimum contract term for our services is usually 12 months. We aim to provide services within as soon as possible after 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 up to 2 days before we commence providing your service. After the minimum term you can cancel any

service by calling our Customer Service Helpdesk on 0800 652 9192 giving us the notice period set out in the Service Agreement.

Faults and repairs

Please call our Customer Service Team on 0800 652 9192 if you experience a fault with any of our services. We aim to begin investigating within 1 hour and have the fault repaired by midnight on the first working day after the day the fault was reported. We supply customers with different levels of service agreement, and the target to fix will vary dependent on the level agreed.

Price lists

Our pricing structure is available from our Customer Service Team on 0800 652 9192 and by contacting your Account Manager. We will write to you in advance if we change the pricing structure on your products and services.

Billing

We will invoice you monthly for services provided.

Unless otherwise agreed in writing, payment will be collected by direct debit. If you wish to change your method of payment at any time, please contact our Customer Service Team.

We provide itemised bills showing calls over 40p via post or all calls via e-mail at no extra cost as part of our service to you.

If you have difficulty paying your bill, please contact us on 0800 652 9192 and we will try to arrange a different method of payment. 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 652 9192 no later than 14 days before your move date. We will amend your account and billing requirements as necessary.

Number porting (if applicable)

Legal TX 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 652 9192

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 652 9192. 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 Otelo (the Telecommunications Ombudsman) or Ofcom. Our Code of Practice for Complaint Handling is included in this document.

Advice for consumers on how to make a complaint can be found at:

<http://consumers.ofcom.org.uk/2009/07/complaints-guide/>.

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 652 9192 to report the incident, and for information on how to deal with this situation.

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:

- Additional help and support if you have difficulty paying your bill
- A free Directory Enquiries service for people who are unable to use the printed phone book

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

Data protection

We are registered with the Data Protection Agency to hold information necessary to supply services to our customers.

Useful addresses

Otelo, PO Box 730, Warrington, WA4 6WU. Tel: 0845 450 1614

Ofcom, Riverside House, 2a Southwark Bridge Road, London SE1 9HA. Tel: 020 7981 3000/ 0845 456 3000

www.ofcom.org.uk

ICSTIS, Clove Building, 4 Maguire Street, London SE1 2NQ. Tel: 020 7940 7474.

Federation of Communication Services (FCS), Burnhill Business Centre, Provident House, Burrell Row, Beckenham, Kent BR3 1AT. Tel: 020 8249 6363 www.fcs.org.uk

Code of Practice for Complaint Handling

Introduction

We make every effort to ensure that our customers are happy with the level of service, and the products and service they receive from us. However, despite our best efforts, things can go wrong. When they do, we want to know so that we can put them right as soon as possible.

This code of practice explains how to contact us and our procedures for resolving complaints about sales, billing, fault repair or services. The Code forms part of our Code of Practice. It is available on request from our Customer Service Helpdesk on 0800 652 9192 and from our website - www.legaltx.co.uk

If you have a complaint

Please telephone our Customer Service Team or your Account Manager on 0800 652 9192. Our advisors will ask you about your complaint and seek to resolve the problem while you are on the line. If this is impossible, we will agree a course of action with you.

You may also send your complaint in writing to us at:

Legal TX (Midshire Business Systems (Communications) Ltd.)

95-97 Cato Street

Nechells

Birmingham

B7 4TS

Or via an e-mail enquiry to support@legaltx.co.uk

During any discussions we will protect the privacy of the information that we hold on you. We may have to ask you questions to confirm that we are speaking to the right person.

Taking your complaint further

If your complaint is not resolved to your satisfaction after this procedure, you can take it further within our company to the Support Manager and ultimately to the Managing Director.

If we cannot resolve the problem, then we will write to you to say so. If we cannot settle a complaint to your satisfaction, you may ask for help from Otelo (the Telecommunications Ombudsman) or Ofcom.

Advice for consumers on how to make a complaint can be found at:

<http://consumers.ofcom.org.uk/2009/07/complaints-guide/>.

Useful addresses

Otelo, PO Box 730, Warrington, WA4 6WU. Tel: 0845 450 1614

Ofcom: Riverside House, 2A Southwark Bridge Road, London SE1 9HA, Tel: 020 7981 3000 www.ofcom.org.uk

Federation of Communication Services Limited (FCS), Burnhill Business Centre, Provident House, Burrell Row, Beckenham, Kent BR3 1AT. Tel: 020 8249 6363 www.fcs.org.uk

Code of Practice for Sales and Marketing of Fixed-Line Telephone Services

Introduction and overview

The purpose of our Code of Practice is:

- to show that Legal TX (“our”, “us”, and “we” refer to Legal TX (Midshire Business Systems (Communications) Ltd.)) adopts responsible best-practice 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 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 and agents are briefed on this code and we routinely monitor compliance with it. If you feel that any representative of Legal TX has breached the terms of the code, please report your concerns to Jim Callaghan, Managing Director, 0121 380 3809, jim.callaghan@legaltx.co.uk) who has responsibility for compliance with this code, and for handling associated complaints.

Copies of this code are available free of charge in various formats on request, including via our website www.legaltx.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 E-mail 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 who have direct sales and marketing contact with customers. We also ensure that all our subcontractors

and agencies 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 train our sales and marketing employees 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 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 sales and marketing personnel are designed to discourage misleading or exploitative sales practices.

Customer contact

Our sales staff 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.

On making contact, our representatives will immediately identify themselves, state our company name, the purpose of the call and how long it should take.

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
Legal TX Codes Of Practice – Review 01/04/2006

months. Records include the date and the approximate time of the contact with you. To help us deal with any complaints or queries, all such records clearly identify the salesperson(s) who made the call or visit.

Entering into a contract

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

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

We will tell you that 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, including how it works, 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 e-mail to:

Letter:

Legal TX (Midshire Business Systems (Communications) Ltd.)
95-97 Cato Street
Nechells
Birmingham
B7 4TS

E-mail: info@legaltx.co.uk

Tel: 0800 652 9192

Fax: 0800 652 7970

Contract review

Our standard procedures minimise the risk of errors or mis-selling on our part when taking orders or making contracts during face-to-face or telephone selling.

We confirm orders by sending a notification of transfer letter to the customer in accordance with the industry agreed

process. The letter, which is clearly dated, gives details of the transfer, including the date of transfer, and information on any services and features which may be affected by the transfer. The letter also provides contact details for any questions.

We contact all customers entering into a new contract to confirm that you understand that you have entered into a contract, are happy to proceed with the contract and are content with the way in which we conducted the sales and marketing.

This check is generally incorporated into the order confirmation letter but is always completed not more than 5 working days after a contract is agreed. Where we contact you directly, this is done by a person not involved with our sales and marketing activities, who will tell you who they are.

The letter may be sent electronically if you have applied online and have confirmed online that you wish future correspondence to be sent electronically.

We will terminate the contract without charge or other penalty to you if we find that you did not understand the contract or it was not what you intended or if it was finalised before the expiry of the switchover period, and you wish to cancel.

We keep our contract procedures under review and take steps to prevent the recurrence of any problem identified through audit (see below).

Audit

We carry out regular audits of the systems, procedures and documents we use in sales and marketing.

Customer complaints procedure

Complaints about sales and marketing are dealt with under the procedures set out in our Consumer Code of Practice.

Our complaints procedure sets out how you may complain, and this includes complaints about Legal TX's sales and marketing. It specifies what to do next if you believe the complaint has not been dealt with satisfactorily.

You should first direct your complaint to Legal TX. If we cannot resolve the complaint to your satisfaction, you may contact Otelo or Ofcom. You can also ask for advice from your local Trading Standards Department or Citizens Advice Bureau.

Status of this code

By law, all companies marketing services to customers must issue a code of practice for sales and marketing. Compliance with this code does not guarantee that it complies with any other legal requirement. Non-compliance with this code does not affect the validity of any contract between the company and the consumer, unless the law states otherwise.

Useful addresses

Otelo - Wilderspool Park, Greenall's Avenue, Warrington, Cheshire, WA4 6HL. Tel: 01925 430870

www.otelo.org.uk

Ofcom - Riverside House, 2a Southwark Bridge Road, London SE1 9HA. Tel: 020 7981 3000/ 0845 456 3000.

www.ofcom.org.uk

Direct Marketing Association - DMA House, 70 Margaret Street, London W1W 8SS Tel: 020 7291 3308

www.dma.org.uk

Federation of Communication Services (FCS) – Burnhill Business Centre, Provident House, Burrell Row, Beckenham, Kent BR3 1AT. Tel: 020 8249 6363 www.fcs.org.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

Institute of Trading Standards Administration – www.tradingstandards.gov.uk