

**SPITFIRE NETWORK SERVICES LTD
Consumer Code of Practice on Complaint Handling and Dispute Resolution and our
Code of Practice for Premium Rate Services and NTS calls**

**Part 1 - SPITFIRE NETWORK SERVICES LTD Code of Practice on Complaint Handling
and Dispute Resolution for Domestic and Business Customers**

Introduction to our company and services

SPITFIRE NETWORK SERVICES LTD is an independent company that delivers communications services to domestic and business customers. While we may not provide all the component parts of our services ourselves we do take the responsibility for the services delivered to you. So we will liaise with our suppliers to ensure that any problems with their services are resolved promptly.

Purpose of this Code of Practice

This Code informs you about our products, services, and customer care policies. Our code has been approved by Ofcom, the independent regulator for the UK communications industries for the purpose of section 52 of the Communications Act 2003. This code is published on our website: www.spitfire.co.uk Additional copies are available to our domestic and business customers. It is also available in larger print.

How to contact us

Please contact our Customer Support Team

By phone: 020 7501 3030 (24 hour Service 365 days a year)

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

By fax: 020 7501 3031

By letter: SPITFIRE NETWORK SERVICES LTD

The Printworks
139 Clapham Road
London
SW9 0HP

Website www.spitfire.co.uk

Our commitment to you

We are committed to giving you the highest quality of customer service. When we purchase our services from wholesale providers, 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

- Landline telephones/line rental(analogue and digital)
- Landline calls
- CPS-Carrier Pre-Selection
- WLR-Wholesale Line rental
- ISDN-digital telephone lines
- Broadband access
- Internet Services
- Directory enquiries
- Mobile telephone and data services
- Equipment and maintenance service

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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 020 7501 3030.

You may also purchase our services from accredited partners around the UK. For more information, please contact the Partner Sales Team on 020 7501 3150 or see our website www.spitfire.co.uk

Marketing

We work to the principles in the British Code of Advertising, Sales Promotion and Direct Marketing, which are stated on the website, www.cap.org.uk

Terms and conditions

When you subscribe to a service from SPITFIRE NETWORK SERVICES LTD, 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 020 7501 3030. We may carry out a credit check as part of our assessment procedures.

Where applicable, the minimum contract term for our services is 12 months. We aim to provide services within seven working days 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 working days after your order is placed. After 7 working days we will charge you an administration fee as set out in your contract. After the minimum term you can cancel any service by calling our Customer Service Helpdesk on 020 7501 3030 giving us three months notice prior to the contact renewal date.

Faults and repairs

Please call our Customer Service Team on 020 7501 3030 if you experience a fault with any of our services. We aim to have this investigated and repaired within the agreed timescales according to the product type and within industry standard practices.

Compensation and refund policy

Our policy is set out in our Terms and Conditions, available on request or on the company website www.spitfire.co.uk

Price lists

Our pricing structure is available from our Customer Service Team on 020 7501 3030 and on our website www.spitfire.co.uk

Billing

We will bill you monthly or annually according to contract.

Network Services customers are instructed to pay monthly by Direct Debit, however, other goods and services can be paid for by cheque or credit card as agreed in contract. If you wish to change your method of payment at any time, please call our Customer Service Team 020 7501 3030

We provide itemised bills as part of our service to you.

If you have difficulty paying your bill, please contact us on 020 7501 3051 and we will try to arrange a different method of payment. We will do all we can to help our residential and small business customers to manage their bills and avoid disconnection.

If you are moving home or office

Please call our Customer Service Team on 020 7501 3030 as soon as possible before your move date, as some services can take up to 30 days to transfer. We will amend your account and billing requirements as necessary. We will endeavour to offer you the same telephone number to minimise disruption but please note that for geographic numbers this is not always possible.

Number porting

SPITFIRE NETWORK SERVICES LTD recognises that keeping your existing telephone numbers may be important to you. If you move your business to us and wish to keep the number that you have with your old provider, we will arrange it if you ask us. 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 020 7501 3030.

Directory Entries

You are entitled to a Directory Enquiry listing (including an entry in the phone book) for both your fixed and mobile telephone numbers. If you do want your details included, please contact our Customer Service Team on 020 7501 3030

Complaints

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. We take customer complaints very seriously and aim to resolve them quickly and efficiently.

If you have a complaint about any part of our service, please contact our Customer Support Team using one of the following

By phone: 020 7501 3030

By email: support@spitfire.co.uk

By letter: Customer Service Manager, Spitfire Network Services Ltd, 139 Clapham Road, London SW9 0HP

If you telephone, our advisors will ask you about your complaint and seek to resolve the problem while you are on the line. During any discussions we will protect the privacy of the information that we hold on you. To do this we may have to ask you questions to confirm that we are speaking to the right person.

If you make your complaint by email or in writing, we will acknowledge receipt, advise how and when we will next respond and provide you with a contact point for checking progress on the resolution of your complaint.

We will try to resolve your complaint quickly and efficiently, and to keep you informed at all times. We normally aim to resolve complaints within 10 working days but, depending on the nature of the complaint, this is not always possible. However, If you are not happy with progress in resolving your complaint you can ask the person to whom you are speaking to escalate the matter to their manager, and ultimately to the Managing Director. If we cannot resolve the problem, we will write to you to say so.

If it has been more than 8 weeks from the date you first contacted us to complain or you have received a letter from us saying that your complaint has reached “deadlock”, then you may ask for help from The Office of the Telecommunications Ombudsman (Otelos): PO Box 730, Warrington, Cheshire, WA4 6WU Tel: 01925 430870 or 0845 050 1614 email: enquiries@otelo.org.uk, Website: www.otelo.org.uk

OTELO is an independent organisation which is approved by Ofcom to provide an alternative dispute resolution (ADR) service. Ofcom-approved ADR services sort out disputes between communications providers and their consumer and small business customers. Their job is to investigate complaints fairly by listening to both sides of the story. They look at the facts given to them before recommending any action that may be needed to put things right.

Alternatively, if at any time you are not satisfied with the progress of your complaint you can ask us to agree an early referral to ADR (i.e. that we issue a deadlock letter). However, we may decline to do so if we do believe we will shortly resolve your complaint and are taking active steps to do so.

Nuisance calls

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 020 7501 3030 to report the incident and for information on how to deal with it.

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 020 7501 3030
- Priority fault repair and assistance
- 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 bills in large print or on computer disc for customers who have difficulty reading their bill
- Specialist hardware and equipment

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

Data protection

We comply fully with our obligations under the Data Protection Act 1998.

Part 2- SPITFIRE NETWORK SERVICES LTD – Code of Practice for Premium Rate Services and NTS calls

Purpose of this Code of Practice

This code informs you about our policies on providing information about Premium Rate Services and NTS calls

Premium rate services

Premium rate services (PRS) are telephone numbers that offer some form of information or entertainment that is charged to your phone bill. UK-based PRS numbers are normally prefixed by “09”. Typical services include TV votelines, mobile ringtone downloads, technical helplines, charity fund-raising and adult entertainment.

Charges for these services are added to your telephone bill. Calling a PRS number generally costs between 10 pence and £1.50 per minute, per call or per text (incl. vat). Calling these services from, for example, mobile phones, cable networks or public payphones will generally cost more than the advertised rate. Our charges for calling these services are shown in our price list, which is available on request from our Customer Services Team 020 7501 3030 and via our website www.spitfire.co.uk

If you have a problem with PRS, we can help. We can provide advice on checking the number of PRS charges that appear on your bill and will try to help you identify the premium rate service provider. We can use call barring to restrict access to "09" numbers. Please call our Customer Service Team on 020 7501 3030 for advice on this. We can give you a fact sheet on PRS.

You can also ask for help from PhonepayPlus which is the industry-funded regulatory body for Premium Rate Services. PhonepayPlus operates a code of practice that sets out standards for the operation of PRS. You can use the PhonepayPlus website at www.phonepayplus.org.uk to check PRS numbers direct or to download a complaint form. PhonepayPlus has legal powers to require a provider of PRS to amend its service or promotional material (or both) and can also impose penalties on content service providers. For other ways to contact PhonepayPlus, see the "Useful addresses" section below.

Number translation services

Number translation services (NTS) are based on numbers that are normally pre-fixed "08". For example, 0800 and 0808 are used to provide freephone services (some freephone services are also provided on 0500 numbers). 0844 and 0845 numbers are used for dial-up pay-as-you-go Internet access and customer service helplines. 0870 and 0871 numbers are used for information services, technical helplines and telephone banking. They are also used by organisations to help them provide call-management features such as intelligent call routing and fax-to-email services.

Charges for calling services on NTS numbers are added to your telephone bill and prices range from free up to a maximum of 10p per minute or per call (incl. vat). Calling these services from, for example, mobile phones, cable networks or public payphones will generally cost more than the advertised rate. Our charges for calling these services are shown in our price list, which is available on request from our Customer Services Team 020 7501 3030 and via our website www.spitfire.co.uk We can also give you a fact sheet on NTS.

If you are unhappy with the help you have received from us on a problem with PRS or NTS, please contact Mrs Susie Ward Tel: 020 7501 3030 who has responsibility for compliance with our code of practice for PRS and NTS. You may also complain using the complaints procedure set out in this code including, ultimately, referring your complaint to Otelo PO Box 730 Warrington Cheshire WA4 6WU Tel: 01925 430870 email: enquiries@otelo.org.uk Website: www.otelo.org.uk

Internet diallers

If you use the Internet, it is possible for software to be placed on your computer without you knowing - using the same methods as for computer viruses. This type of software (known as Internet or rogue diallers) can then make calls to PRS and NTS numbers without your knowledge. Software is available to detect this activity and we can help you to access this - please contact our Customer Services Team on 020 7501 3030 for details. PhonepayPlus has been given responsibility for policing this type of activity and you can contact them via www.phonepayplus.org.uk to ask for help or to report examples of this type of abuse. For other ways to contact PhonepayPlus, see the "Useful addresses" section below. We can also help by barring calls to 09 numbers.

The Telephone Preference Service

If you don't want to get sales and marketing calls you have not requested, you can add your details to a list run by the Telephone Preference Service (TPS). If your name is on the list, it is illegal for a company to call you for marketing purposes. You can contact the Telephone Preference Service via www.tpsonline.org.uk or by telephoning 0845 0700707.

Useful addresses

Otelo – PO Box 730, Warrington, Cheshire, WA4 6WU. Tel: 01925 430870 or 0845 050 1614
e-mail: enquiries@otelo.org.uk Website: www.otelo.org.uk

Ofcom - Riverside House, 2a Southwark Bridge Road, London SE1 9HA. Tel: 0300 123 3333 or
020 7981 3000 e-mail: contact@ofcom.org.uk Website: www.ofcom.org.uk

PhonepayPlus (Formerly ICSTIS) Clove Building, 4 Maguire Street, London, SE1 2NQ. Tel: 0800 500212
or 020 7940 7474 Website: www.phonepayplus.org.uk

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

Telephone Preference Service, DMA House, 70 Margaret Street, London W1W 8SS Tel: 0845 0700707
Website: www.tpsonline.org.uk

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