



Know Your Customer Policy, Procedures and Robocall Mitigation Plan

Broadband Dynamics (BBD) is committed to maintaining robust policy around the Know Your Customer (“KYC”) process. This policy and process strives to identify customer entities effectively in an effort to prevent and mitigate noncompliant and illegal activity on BBD’s network and serves as BBD’s robocall mitigation plan. The following policies and procedures (“KYC Policy”) relates to customers placing a significant number of outbound calls with destinations in the United States.¹

1. Know Your Customer Policy Compliance Designation and Duties

All employees are responsible for acting in accordance with KYC Policy. The following individual(s) and team(s) have specific responsibilities for upholding KYC Policy:

Jennifer Smith, Vice President of Compliance, is the company’s KYC Compliance Lead and is responsible for the company’s KYC Policy and programs. The duties of the KYC Compliance Lead include overseeing policy implementation and updates, monitoring policy compliance, and employee training.

The KYC Compliance Lead will manage KYC Policy adherence in coordination with the following teams and individuals:

Compliance Committee: Jennifer Smith, Ruth Mascardo (Vice President, Client Services), Shaun Garcia (Director of Network Operations)

- Leader: Jennifer Smith
- Responsibilities:
 - Will perform reviews of prospective customers to determine whether they meet company KYC Policy requirements, keeping documentation of information considered and decisions reached.
 - Will perform enhanced due diligence reviews and make KYC decisions for any customers identified in the standard review process that may require heightened scrutiny.

¹ BBD has numerous customers who have systems such as PBXs, therefore the Compliance Committee uses criteria such as the products in use, use case, and average customer minutes to determine which customers are subject to KYC Policy. Additionally, the Compliance Committee at times innovates and explores alternative KYC processes and/or documents as appropriate to the circumstances of specific customers. BBD uses similar KYC processes for upstream providers for which BBD is a gateway provider.

- Responsible for ensuring that company KYC Policy sufficiently meets any applicable legal obligations. Will consult with internal teams and, when necessary, external legal counsel on questions that arise as part of KYC processes.
- Responsible for supporting the development or implementation of the resources needed to perform and document KYC processes in a timely and scalable manner.

2. Pre-Activation Requirements

Verified Identity Program

The following data should be validated against authoritative sources for accuracy where available.

- Full legal name
- State/Province/Country of Business Incorporation
- Secretary of State registration or Employer Identification Number (EIN) or equivalent international information
- Physical address representing a real place of business associated with the entity²
- Entity's parent company(ies) legal name(s) (if applicable)
- Entity's parent company(ies) state/province/country of business incorporation (if applicable)
- Entity's website(s)
- Contact email address³

Understanding Intended Use & History

KYC Policy requires an understanding of customers' intended use of services. The following materials should be collected and reviewed prior to full service activation.

Customers other than Communication Service Provider ("CSP")⁴ customers:

- BBD Know Your Customer Questionnaire (Standard)
- BBD Acceptable Use Policy

² Typically, for US-based communications services, customers should provide a physical address in the United States. In most cases, this should not be a virtual address, shared office location without a dedicated suite or floor, PO box, mail forwarding service, hosted server location, etc. An employee will view the address in Google using street view to verify.

³ Typically, the domain name should match the entity website provided or a domain verified as controlled by the entity, parent company, or associated company.

⁴ Communications service providers ("CSPs") - A legal entity whose products or services enable other businesses to initiate or receive communications.



CSP customers:

- BBD Know Your Customer Questionnaire (Provider)
- BBD Acceptable Use Policy
- The CSP's KYC policy and/or procedure and/or terms and conditions for their customers or the BBD Know Your Customer Questionnaire for each entity sending traffic to the BBD network.

Data or communication collected and relied upon as part of verifying the identity or understanding the intended use and history should be documented and preserved in internal records such that future reviewers can determine what was reviewed or verified, any conclusions drawn, and the individual(s) that conducted the review.

Proactive Establishment of CSP Categorization

CSP customers represent different potential risks and regulatory considerations, and it is important to understand the nature of the customer's business. Many businesses may have incorporated communications services into their own offerings despite not self-identifying as a CSP. Therefore, BBD will use information gathered during the KYC process to help evaluate whether a customer appears to be operating as a CSP.

Enhanced Due Diligence

For any entities that the Compliance Committee deems eligible for enhanced due diligence after completing the standard review process, additional steps may be taken to review, monitor, and restrict accounts. Accounts in this category will require unanimous approval by the Compliance Committee. If approved, the Compliance Committee will determine if additional risk mitigation measures are necessary to service the account.

3. Post Activation

Activity Monitoring

Customer accounts will be monitored for potentially unusual or suspicious usage.⁵ The following metrics will be monitored:

- Traceback requests

⁵ BBD does not use data analytics as a part its Robocall Mitigation Plan.



- Reports of alleged improper communications sent to BBD from downstream providers, the general public, or others
- Subpoena or other regulatory body requests sent to BBD
- Calls with an improper caller ID (such as on a Do Not Originate list)

Further KYC Reviews

At the discretion of the Compliance Committee, Customer accounts may be reviewed under the KYC Policy based on events logged from the above Activity Monitoring or other events.

4. Related Policies and Procedures

KYC Policy Employee Agreement

All BBD support, service delivery, and credit department team members along with all BBD employees who are at director level or above will sign the BBD KYC Policy Employee Agreement.

Response to Traceback Requests

BBD takes seriously any request from the FCC, law enforcement, the industry traceback consortium, and other regulatory entities and will fully cooperate with such entities in investigating and stopping illegal robocallers that use its service within 24 hours of receipt of such request.



KNOW YOUR CUSTOMER QUESTIONNAIRE (“QUESTIONNAIRE”)

1. Company Full Legal Name (“Company”):
2. List other trade names and DBAs:
3. Company Address:
4. Company contact information of company principals, or if publicly traded, most appropriate senior contact:

Name	Title	Email Address	Mobile Phone

5. Company contact information of company employees responsible for compliance including compliance with the Telephone Consumer Protection Act (“TCPA”), Telemarketing Sales Rule (“TSR”), and other federal and state/province laws governing telemarketing and automated dialing:

Name	Title	Email Address	Mobile Phone

6. Is or will the company originating your calls and/or SMS/MMS messages (“Calls”) be the same as the Company listed above?
☐ YES ☐ NO
If no, please list name and location of the company originating Calls via BBD’s services here:

7. What is the Company’s web domain?
8. How many years has the Company been in business?
9. What country(ies) do the Calls originate from?
10. Please describe the primary business use case including industry(ies) is the Company in.
11. Is the Company a current member of any industry trade associations? ☐ YES ☐ NO

If yes, list here:



12. Does or will the Company use BBD's voice services to initiate any Calls which terminate in the United States or accept any inbound Calls which originate from the United States?
☐ YES ☐ NO

If no, you may skip any questions below which are marked with "*US".

13. Does or will the Company use BBD's voice services to initiate any Calls which terminate in Canada or accept any inbound Calls which originated from Canada? ☐ YES ☐ NO

If no, you may skip any questions below which are marked with "*CAN".

14. (*US) Does the Company have written policies, practices and procedures relating to the Company's compliance with applicable dialing and/or telemarketing laws, including, without limitation, the TCPA and the TSR, and other federal and state laws that regulate telemarketing, auto-dialed calls, calls to numbers on the DNC registry, calls to wireless numbers? ☐ YES ☐ NO

If no, please explain the reasoning.

15. (*CAN) Does the Company have written policies, practices and procedures relating to the Company's compliance with applicable dialing and/or telemarketing laws, including, without limitation, the Canadian Radio-Television and Telecommunications Commission ("CRTC") Telemarketing Rules, CRTC National DNCL Rules, CRTC Automatic and Announcing Device Rules, and other federal and province laws that regulate telemarketing, auto-dialed calls, calls to numbers on the National DNCL, calls to wireless numbers? ☐ YES ☐ NO

If no, please explain the reasoning.

16. (*US) Does the Company have a SAN (Subscription Account Number) for DNC Registry?
☐ YES ☐ NO

If yes, list here:

If no, please explain legal justification for not having a SAN.

17. (*CAN) Is the Company registered with the National DNCL?
☐ YES ☐ NO

If no, please explain legal justification for not registering with the National DNCL.

18. Does or will the Company telemarket on behalf of its clients? ☐ YES ☐ NO

(*US) If yes, does the Company use their clients SAN? ☐ YES ☐ NO



19. Does or will the Company use BBD's voice services to deliver, initiate, process, and/or facilitate any Calls which use regulated technologies including the use of automated telephone dialing systems (ATDS) as defined by the TCPA, automatic dialing announcing devices (ADAD) as defined by the CRTC, or other regulated automated dialing technology (collectively referred to as "Automated Technology") or to deliver, initiate, process, and/or facilitate any Calls which use an artificial or prerecorded voice, voice or Calls generated via artificial intelligence, soundboard technology, or ringless voicemail (collectively referred to as "Artificial/Prerecorded Voice")? (Automated Technology and Artificial/Prerecorded Voice collectively referred to as, "Regulated Technology".)

Select All that Apply:

- ☐ YES-Automated Technology
☐ YES-Artificial/Prerecorded Voice
☐ YES-Other Regulated Technology: _____
☐ NO

If yes to any of the above:

- A. Describe representative examples/use cases of each such type of Call.
- B. Identify the specific equipment and/or calling platform used to deliver, initiate, process, and/or facilitate the Calls.
- C. Does or will the Company use BBD's services to deliver, initiate, process, and/or facilitate any Calls with Automated Technology or Regulated Technology, or to deliver, initiate, process, and/or facilitate any Calls using an Artificial/Prerecorded Voice where it does not have one-to-one prior express written consent of the called party to contact them using Regulated Technology?
☐ YES ☐ NO
- C1 - If yes, describe all facts and circumstances of such Calls and your basis for delivering, initiating, processing, and/or facilitating any such Calls consistent with applicable law.
- C2 - If no, describe how Company obtains one-to-one prior express written consent from the called party for use of each of the Regulated Technologies.
- D. Does or will the Company use BBD's services to deliver, initiate, process, and/or facilitate any Calls to wireless phone numbers using Automated Technology, Regulated Technology, or Artificial/Prerecorded Voice? ☐ YES ☐ NO

If yes, describe the processes in place to ensure the number being Called is proper to reach the intended called party.



20. Does or will the Company use BBD's voice services to receive any inbound Calls that the Company knows or reasonably believes to have been handed off to it, directly or indirectly, from Calls that were delivered, initiated, processed, and/or facilitated using Automated Technology or Artificial/Prerecorded Voice?

To clarify, this question is not referring to inbound calls where the calling party directly calls Company. For example, it is not referring to Company initiating an outbound call and the called party directly calling Company back. An example of what this question is referring to includes if an outbound call is initiated (typically by a third party) and that call is transferred to Company. For example, if another entity places an outbound call to pre-qualify a lead and the call is then transferred to Company.

Select All that Apply:

- ☐ YES-Automated Technology
☐ YES-Artificial/Prerecorded Voice
☐ YES-Other Regulated Technology: _____
☐ NO

If yes to any of the above:

- A. Describe representative examples/use cases of each such type of Call.
- B. Identify the specific equipment and/or calling platform used to initiate or deliver the Calls.
- C. Does or will the Company use BBD's services to receive inbound Calls that were delivered, initiated, processed, and/or facilitated via Automated Technology or Regulated Technology, or Calls that utilized or delivered Artificial/Prerecorded Voice where the Company does not have one-to-one prior express written consent of the called party to contact them using Regulated Technology?
☐ YES ☐ NO
- C1 - If yes, describe all facts and circumstances of such Calls and your basis for receiving any such Calls consistent with applicable law.
- C2 - If no, describe how Company obtains one-to-one prior express written consent from the called party for use of each of the Regulated Technologies.
- D. Does or will the Company use BBD's services to receive any inbound Calls from wireless phone numbers where such Calls were delivered, initiated, processed, and/or facilitated via Automated Technology or Regulated Technology, or Calls that utilized or delivered Artificial/Prerecorded Voice? ☐ YES ☐ NO

If yes, describe the processes the in place to ensure the number being Called is proper to reach the intended called party.

21. Identify each country associated with any IP addresses from which the traffic traversing the BBD network may originate.

- ☐ United States
☐ Canada



☐ Other: Please list each country and explain each specific use case.

22. Does or will the Company use BBD's voice services to make any unsolicited Calls?

☐ YES ☐ NO

If yes, please describe the nature of the Calls and the Company's practices for ensuring such Calls are lawfully made, including all lists the Company scrubs against before making such Calls.

23. Does the Company confirm that, when using BBD's services, the following is correct. (1) Company does not and will not place telemarketing calls, or (2) When placing telemarketing calls, Company always removes all records where the phone number is on the National Do Not Call list, or (3) When placing telemarketing calls, if a number is on the National Do Not Call list, Company has proof of one-to-one prior express written consent of the called party to contact them. ☐ CONFIRMED CORRECT ☐ NOT CONFIRMED

If not confirmed, describe all facts and circumstances of such Calls and your basis for making any such Calls consistent with applicable law.

24. Describe the Company's caller-ID practices for the outbound Calls it initiates via BBD's voice services.

- a. What practice do you use to determine what number to use as the caller ID, such as each campaign has a specific number or set of numbers?
- b. Do you only use numbers provided by BBD, and if not, please describe in detail the source(s) of the numbers that are used for caller ID?

25. Does the Company represent and warrant that it has not engaged and will not engage in any illegal spoofing via its use of BBD's services? ☐ YES ☐ NO

26. Does the Company confirm that, when using BBD's services, the Company displays and will only display valid Caller ID numbers lawfully owned by Company or by Company client(s) who have authorized use of the number(s) and that, when called, ring back to the Company or one of its agents designated to receive such call-backs?

☐ CONFIRMED CORRECT ☐ NOT CONFIRMED

If in any instance this is not confirmed, please describe the practice in question and explain any exceptions and the legal theory to support this practice.

27. Does the Company confirm that it has never used and will never use BBD's voice services in connection with a one-ring scam, where the term "one-ring scam" is a situation in which a caller makes a call and allows the call to ring the called party for a short duration, in order to prompt the called party to return the call, thereby subjecting the called party to charges?

☐ CONFIRMED CORRECT ☐ NOT CONFIRMED

28. Does the Company confirm that it has policies and procedures in place to ensure that Calls are not initiated to phone numbers which have been requested to not be called and/or who have opted-out of Calls? ☐ CONFIRMED CORRECT ☐ NOT CONFIRMED



29. Notwithstanding any prior questions, does or will the Company use BBD's services to make any Calls with regulated technology or Automated Technology, or to deliver any Calls using an Artificial/Prerecorded Voice where it does not have one-to-one prior express written consent of the called party to contact them using such technology? ☐ YES ☐ NO

If yes, describe all facts and circumstances of such Calls and your basis for making any such Calls consistent with applicable law.

30. Does the Company confirm its use of BBD's services and all Calls initiated delivered, processed, and/or facilitated - including any use of Automated Technology, Artificial/Prerecorded Voice, and any other regulated technology - are and will always be fully compliant with all local, state/provincial, and federal regulations including all telemarketing and consumer protection law issues (e.g., TSR, FTC Act, TCPA, Fair Debt Collection Practices Act, CRTC regulations)?
☐ CONFIRMED CORRECT ☐ NOT CONFIRMED

If not confirmed, describe all facts and circumstances of such use and your basis for making any such Calls.

31. (*US) Is the Company required to register in the Robocall Mitigation Database (RMD), pursuant to 47 CFR § 64.6305 or any other regulation? ☐ YES ☐ NO

If yes, please attach the Company's Know Your Customer Policies and Procedures and list the following regarding the Company's RMD registration:

FCC Registration Number (FRN):

Robocall Mitigation Database ID:

FCC Form 499 Filer ID Number:

32. Has the Company (or any predecessor or affiliated entity, or another entity controlled by any person or entity that controls Company) ever had an Industry Traceback Group (ITG) Traceback? ☐ YES ☐ NO

If yes, please list Company history of ITG traceback requests here:

33. Has the Company (or any predecessor or affiliated entity, or another entity controlled by any person or entity that controls Company) ever been involved in any litigation, or investigation by any state/province or federal regulators or Attorneys General related to alleged telemarketing or consumer protection law issues or alleged violations (e.g., TSR, FTC Act, TCPA, Fair Debt Collection Practices Act, CRTC regulations)?
☐ YES ☐ NO

If yes, please detail here:

34. Has the Company (or any predecessor or affiliated entity, or another entity controlled by any person or entity that controls Company) been involved in the last five years in any civil litigation related to alleged telemarketing or consumer protection law issues or alleged



violations (e.g., TSR, FTC Act, TCPA, Fair Debt Collection Practices Act, CRTC regulations)? ☐ YES ☐ NO

If yes, please detail here including applicable case title(s) and case number(s):



With my signature below:

I hereby warrant and represent:

- That I am an authorized Company representative.
- The aforementioned statements to be true and accurate representations.
- The Company will notify BBD within 7 days should any of the answers provided herein become untrue or inaccurate.
- The Company has not and will not engage in any illegal use of BBD's services, including but not limited to illegal robocalling, which I understand and agree is prohibited by BBD's Acceptable Use Policy and Terms and Conditions, which, among other things, requires the Company to defend and indemnify BBD against any claims and costs related to the prohibited use of BBD's voice network.
- The Company will fully cooperate with and respond to all inquiries and investigations by BBD, call stream carriers, traceback administrators, and other regulatory bodies within 24 hours.
- The Company authorizes this Questionnaire, its contents, all referenced attachments, as well as any other information Company has provided as part of the Know Your Customer process to be provided to third parties as BBD deems necessary, including, but not limited to, voice service providers, the US Telecom Industry Traceback Group, and regulatory agencies.

Company name

Authorized Company representative name

Title

Email Address

Mobile Phone Number

Signature

Date



KNOW YOUR CUSTOMER PROVIDER QUESTIONNAIRE (“QUESTIONNAIRE”)

1. Company Full Legal Name (“Company”):
2. List other trade names and DBAs:
3. Company Address:
4. Company contact information of company principals, or if publicly traded, most appropriate senior contact:

Name	Title	Email Address	Mobile Phone

5. Company contact information of company employees responsible for compliance including compliance with the Telephone Consumer Protection Act (“TCPA”), Telemarketing Sales Rule (“TSR”), and other federal and state/province laws governing telemarketing and automated dialing:

Name	Title	Email Address	Mobile Phone

6. What is the Company’s web domain?
7. How many years has the Company been in business?
8. What country(ies) do and will the calls and/or SMS/MMS messages (“Calls”) originate from?
9. Please describe the primary business use case including industry(ies) is the Company in.
10. Is the Company a current member of any industry trade associations? ☐ YES ☐ NO

If yes, list here:

11. Does or will the Company use BBD’s voice services to deliver, initiate, process and/or facilitate any Calls which use regulated technologies including the use of automated telephone dialing systems (ATDS) as defined by the TCPA, automatic dialing announcing devices (ADAD) as defined by the Canadian Radio-television and Telecommunications Commission (“CRTC”), or other regulated automated dialing technology (collectively referred to as “Automated Technology”) or to deliver, initiate, process, and/or facilitate any Calls which use an artificial or prerecorded voice, voice or Calls generated via artificial intelligence, soundboard technology or ringless voicemail (collectively referred to as “Artificial/Prerecorded Voice”)? (Automated Technology and Artificial/Prerecorded Voice collectively referred to as, “Regulated Technology”.)



Select All that Apply:

- ☐ YES-Automated Technology
- ☐ YES-Artificial/Prerecorded Voice
- ☐ YES-Other Regulated Technology: _____
- ☐ NO

If yes to any of the above:

A. Describe representative examples/use cases of each such type of Call.

B. Identify the specific equipment and/or calling platform used to deliver, initiate, process, and/or facilitate the Calls.

C. Does or will the Company use BBD's services to initiate and/or facilitate any Calls with Automated Technology or Regulated Technology, or to deliver, initiate, process, and/or facilitate any Calls using an Artificial/Prerecorded Voice where the calling party does not have one-to-one prior express written consent of the called party to contact them using Regulated Technology? ☐ YES ☐ NO

C1 - If yes, describe all facts and circumstances of such Calls and your basis for making any such Calls consistent with applicable law.

C2 - If no, describe how the calling party obtains one-to-one prior express written consent from the called party for use of each of the Regulated Technologies.

D. Does or will the Company use BBD's services to deliver, initiate, process, and/or facilitate any Calls to wireless phone numbers using Automated Technology, Regulated Technology, or Artificial/Prerecorded Voice? ☐ YES ☐ NO

If yes, describe the processes the in place to ensure the number being Called is proper to reach the intended called party.

12. Does or will the Company use BBD's services to receive any inbound Calls that the Company knows or reasonably believes to have been handed off to it, directly or indirectly, from Calls that were delivered, initiated, processed, and/or facilitated using Automated Technology or Artificial/Prerecorded Voice?

To clarify, this question is not referring to inbound calls where the calling party directly calls Company. For example, it is not referring to Company initiating an outbound call and the called party directly calling Company back. An example of what this question is referring to includes if an outbound call is initiated (typically by a third party) and that call is transferred to Company. For example, if another entity places an outbound call to pre-qualify a lead and the call is then transferred to Company.

Select All that Apply:

- ☐ YES-Automated Technology
- ☐ YES-Artificial/Prerecorded Voice



- ☐ YES-Other Regulated Technology: _____
- ☐ NO

If yes to any of the above:

- A. Describe representative examples/use cases of each such type of Call.
- B. Identify the specific equipment and/or calling platform used to initiate or deliver the Calls.
- C. Does or will the Company use BBD's services to receive inbound Calls that were delivered, initiated, processed, and/or facilitated via Automated Technology or Regulated Technology, or Calls that utilized or delivered Artificial/Prerecorded Voice where the calling party does not have one-to-one prior express written consent of the called party to contact them using Regulated Technology? ☐ YES ☐ NO
- C1 - If yes, describe all facts and circumstances of such Calls and your basis for making any such Calls consistent with applicable law.
- C2 - If no, describe how the calling party obtains one-to-one prior express written consent from the called party for use of each of the Regulated Technologies.
- D. Does or will the Company use BBD's services to receive any inbound Calls from wireless phone numbers where such Calls were delivered, initiated, processed, and/or facilitated via Automated Technology or Regulated Technology, or Calls that utilized or delivered Artificial/Prerecorded Voice? ☐ YES ☐ NO

If yes, describe the processes in place to ensure the number being Called is proper to reach the intended called party.

13. Identify each country associated with any IP addresses from which the traffic traversing the BBD network may originate.
- ☐ United States
- ☐ Canada
- ☐ Other: Please list each country and explain each specific use case.
14. Describe the Company's caller-ID practices for the outbound Calls it initiates and/or facilitates via BBD's voice services.
- a. What practice do you use to determine what number to use as the caller ID, such as each campaign has a specific number or set of numbers?
- b. Do you only use numbers provided by BBD, and if not, please describe in detail the source(s) of the numbers that are used for caller ID?
15. Does the Company represent and warrant that it has not engaged and will not engage in any illegal spoofing via its use of BBD's services? ☐ YES ☐ NO
16. Does the Company confirm that, when using BBD's services, all calls will display only valid Caller ID numbers lawfully owned by Company or by Company client(s) who have



authorized use of the number(s) and that, when called, ring back to the Company, the Company's clients, or one of its agents designated to receive such call-backs?

☐ CONFIRMED CORRECT ☐ NOT CONFIRMED

If in any instance this is not confirmed, please describe the practice in question and explain any exceptions and the legal theory to support this practice.

17. Does the Company confirm that it has never used and will never use BBD's voice services in connection with a one-ring scam, where the term "one-ring scam" is a situation in which a caller makes a call and allows the call to ring the called party for a short duration, in order to prompt the called party to return the call, thereby subjecting the called party to charges?

☐ CONFIRMED CORRECT ☐ NOT CONFIRMED

18. Notwithstanding any prior questions, does or will the Company use BBD's services to initiate and/or facilitate any Calls with regulated technology or Automated Technology, or to deliver any Calls using an Artificial/Prerecorded Voice where the calling party does not have one-to-one prior express written consent of the called party to contact them using such technology?

☐ YES ☐ NO

If yes, describe all facts and circumstances of such Calls and your basis for initiating and/or facilitating any such Calls consistent with applicable law.

19. Is the Company required to register in the Robocall Mitigation Database (RMD), pursuant to 47 CFR § 64.6305 or any other regulation? ☐ YES ☐ NO

If no, please explain the reasoning.

If yes, provide the following regarding the Company's RMD registration:

FCC Registration Number (FRN):

Robocall Mitigation Database ID:

FCC Form 499 Filer ID Number:

20. Does the Company have a formal Know Your Customer procedure/policy to validate and vet each of Company's customers before traffic from each customer is allowed to traverse the BBD network? ☐ YES ☐ NO

If no, please explain the reasoning.

If yes, please attach Company's Know Your Customer Policies and/or Procedures.

21. Before traffic from each customer is allowed to traverse the BBD network, does the Company confirm it will have a binding agreement with each of the Company's customers in which the Company's customer has a contractual obligation to prohibit all unlawful traffic including prohibiting traffic that would violate the TCPA, TSR, The Federal Trade Commission ("FTC") Act, or other FTC, Federal Communications Commission ("FCC"), or CRTC regulations? ☐ CONFIRMED CORRECT ☐ NOT CONFIRMED

If in any instance this is not confirmed, please explain the reasoning.



22. Before traffic from each customer is allowed to traverse the BBD network, does the Company confirm it will have (a) full contact information (including full name, address, phone number, email address) for each of Company's customers, (b) the ability to identify which customer initiated each Call Company sends to the BBD network, and (c) the ability to reach each customer in a timely manner in case of inquiries and investigations by BBD, call stream carriers, traceback administrators, and other regulatory bodies? ☐ CONFIRMED CORRECT
☐ NOT CONFIRMED

If in any instance this is not confirmed, please explain the reasoning.

23. Does the Company have mechanisms in place to ensure its customers, employees, and/or contractors comply with the TCPA, TSR, The FTC Act, and other FTC, FCC, and CRTC rules and regulations? ☐ YES ☐ NO

If no, please explain the reasoning.

24. Does the Company confirm its use of BBD's services and all Calls initiated delivered, processed, and/or facilitated - including any use of Automated Technology, Artificial/Prerecorded Voice, and any other regulated technology - are and will always be fully compliant with all local, state/provincial, and federal regulations including all telemarketing and consumer protection law issues (e.g., TSR, FTC Act, TCPA, Fair Debt Collection Practices Act, CRTC regulations)?
☐ CONFIRMED CORRECT ☐ NOT CONFIRMED

If not confirmed, describe all facts and circumstances of such use and your basis for making any such Calls.

25. Is the Company a member of the US Telecom Industry Traceback Group (ITG)?
☐ YES ☐ NO

26. Does the Company actively participate in the ITG traceback process? ☐ YES ☐ NO

27. Has the Company (or any predecessor or affiliated entity, or another entity controlled by any person or entity that controls Company) ever been determined by the ITG to be a "Non-Cooperative Voice Service Provider" or "Non-Responsive Voice Service Provider"?
☐ YES ☐ NO

If yes, please detail here:

28. Has the Company (or any predecessor or affiliated entity, or another entity controlled by any person or entity that controls Company) ever had an ITG Traceback? ☐ YES ☐ NO

If yes, please list Company history of ITG traceback requests here:



29. Has the Company ever been blocked from any other voice service provider's network after being determined to be a "bad actor upstream voice service provider" in accordance with a notice from the FCC? ☐ YES ☐ NO

If yes, please detail here:

30. Has the Company (or any predecessor or affiliated entity, or another entity controlled by any person or entity that controls Company) ever been involved in any litigation, or investigation by any state or federal regulators or Attorneys General related to alleged telemarketing or consumer protection law issues or alleged violations (e.g., TSR, FTC Act, TCPA, Fair Debt Collection Practices Act, CRTC regulations)? ☐ YES ☐ NO

If yes, please detail here:

31. Has the Company (or any predecessor or affiliated entity, or another entity controlled by any person or entity that controls Company) been involved in the last five years in any civil litigation related to alleged telemarketing or consumer protection law issues or alleged violations (e.g., TSR, FTC Act, TCPA, Fair Debt Collection Practices Act, CRTC regulations)? ☐ YES ☐ NO

If yes, please detail here including applicable case title(s) and case number(s):



With my signature below:

I hereby warrant and represent:

- That I am an authorized Company representative.
- The aforementioned statements to be true and accurate representations.
- The Company will notify BBD within 7 days should any of the answers provided herein become untrue or inaccurate.
- The Company has not and will not engage in any illegal use of BBD's services, including but not limited to illegal robocalling, which I understand and agree is prohibited by BBD's Acceptable Use Policy and Terms and Conditions, which, among other things, requires the Company to defend and indemnify BBD against any claims and costs related to the prohibited use of BBD's voice network.
- The Company will fully cooperate with and respond to all inquiries and investigations by BBD, call stream carriers, traceback administrators, and other regulatory bodies within 24 hours.
- The Company authorizes this Questionnaire, its contents, all referenced attachments, as well as any other information Company has provided as part of the Know Your Customer process to be provided to third parties as BBD deems necessary, including, but not limited to, voice service providers, the US Telecom Industry Traceback Group, and regulatory agencies.

Company name

Authorized Company representative name

Title

Email Address

Mobile Phone Number

Signature

Date



BBD KNOW YOUR CUSTOMER POLICY – EMPLOYEE AGREEMENT

Broadband Dynamics (“BBD”) corporate policy is to prohibit illegal traffic on its network with ongoing screening of new and existing clients.

As a part of this effort, BBD employees are required to confirm their agreement to BBD’s Know Your Customer Policy and as a part of their employment, to make the following commitments as it relates to assisting in BBD’s policy enforcement:

- I have firsthand knowledge of BBD’s voice network and/or clients.
- I commit to immediately reporting any suspicious or potentially illegal activity I observe from BBD clients using our network.
- I will report and collaborate with my coworkers on the BBD Compliance Committee in an investigation and potential block or removal of client from BBD network.
- I acknowledge that the final decision to remove a client is based upon a majority vote of the full committee and that no one individual BBD employee, or BBD ownership, will have final say or weighted influence in the final decision.
- All reports of suspected illegal robocalling will be documented in writing by a member of BBD’s Compliance Committee and archived by BBD.

With my signature below, I acknowledge and agree to BBD’s Know Your Customer Policy and to participating in enforcement and fulfillment of BBD efforts to prevent illegal traffic on the BBD voice network.

BBD Employee Name

Title

Signature

Date



Broadband Dynamics, LLC Acceptable Use Policy

This Acceptable Use Policy ("AUP") describes actions that Broadband Dynamics, LLC ("BBD") prohibits when any party uses its Services. By ordering or using BBD's Services, you, the Customer or service recipient, agree to the terms of this AUP. Each Customer must review and comply with this AUP and all applicable laws, but this AUP is not intended to be interpreted as, relied upon, or used as a substitute for legal advice. You agree not to use, and not to encourage or allow any end user or other party to use, BBD's Services in unlawful or prohibited manners, including, but not limited to, the following:

- Using the Services to engage in any activities that are illegal, abusive, false, fraudulent, deceptive or misleading, or any activity that exploits, harms, or threatens to harm children.
- Engaging in any unsolicited advertising, marketing, or other unlawful activities using the Services, including without limitation, any activities that violate laws applicable to advertising, electronic communications, and telemarketing, including, but not limited to, Section 5 of the FTC Act (15 U.S.C. § 45), the CAN-SPAM Act (15 U.S.C. §§ 7701-7713), the Telemarketing Consumer Fraud and Abuse Prevention Act (15 U.S.C. §§ 6101-6108), the Federal Trade Commission Telemarketing Sales Rule (16 C.F.R. § 310 et seq.), the Telephone Consumer Protection Act (47 U.S.C. § 227), the Federal Communications Commission regulations (47 C.F.R. 64.1200 et seq.) and orders implementing the Telephone Consumer Protection Act, all federal and state Do Not Call, calling-time, and call-quantity restriction laws and regulations.
- Using BBD's Services in any way that fails to conform to any applicable industry guidelines and standards, including, without limitation, the CTIA Messaging Principles and Best Practices, Short Code Registry Best Practices and Short Code Monitoring Handbook.
- Attempting to bypass or disable any security mechanism on any of the Services or using the Services in any other manner that poses a security or service risk.
- Reverse-engineering the Services for any improper purpose.
- Using the Services in any manner that may subject BBD or any third party to liability, damages, or danger.
- Launching or facilitating a denial-of-service attack on any of the Services or any other conduct that adversely impacts the availability, reliability, or stability of the Services.
- Transmitting any material that contains viruses, trojan horses, worms or any other malicious or harmful programs.
- Using the Services to receive, send or otherwise process Protected Health Information as defined by the Health Insurance Portability and Accountability Act of 1996, as amended, unless you have signed a Business Associate Agreement with BBD or your use of the Services fits within an exception for requiring a Business Associate Agreement.
- Using the Services to store or save credit card information, financial account information, social security numbers, or other information that could be used for fraud or identity theft.
- Using the Services to transmit any material that infringes the intellectual property rights or other rights of third parties.
- Using the Services to transmit any material that is libelous, defamatory, discriminatory, or otherwise malicious or harmful to any person or entity.
- Creating a false identity or forged email address or header, or phone number, or otherwise attempting to mislead others as to the identity of the sender or the origin of a message or phone call, including failing to comply with the Truth in Caller ID Act, 47 U.S.C. § 227, and implementing regulations, 47 C.F.R. § 64.1600 et seq., or using the Services to facilitate a one-ring scam, as the FCC has defined that term (see Report and Order, GC Docket No. 20-93; rel. Nov. 30, 2020).



- Transmitting any data to or through BBD unless Customer represents and warrants that it has obtained and will maintain all necessary licenses, authorizations, approvals and consents to use, transmit, and process any data to or through BBD during and/or in the use of the Services.

This list of prohibited uses is meant to be illustrative and should not be considered exhaustive. All determinations related to violations of this Acceptable Use Policy will be made by BBD in its sole, reasonable discretion. BBD reserves the right to change or modify the terms of the AUP at any time, effective immediately when posted to the BBD website or when BBD notifies you via an invoice insert. Customer's use of the BBD Services after changes to the AUP are posted to the BBD website or sent via an invoice insert shall constitute acceptance of any changes or additional terms. If you have a complaint about abuse or a breach of this AUP, please contact a BBD representative.

If you violate these Terms, we may stop providing Services to you or we may close your account. We may also block delivery of a communication (such as a telephone call or SMS) to or from the Services in an effort to enforce these Terms. You also understand and agree that we are authorized and required to cooperate with and respond to all lawful civil, criminal, and regulatory inquiries relating to your use of the Services, including, without limitation, Traceback and other legal requests or demands from the FCC, FTC, civil and criminal law enforcement, and the FCC-designated USTelecom Industry Traceback Group consortium or any such successor entity. You also understand and agree that, pursuant to your contract with BBD, you agree to defend, indemnify and hold BBD harmless for any claims, demands, suits or proceedings alleging that you have violated the terms of this AUP or your agreement with BBD. When investigating alleged violations of these Terms, BBD reserves the right to review the content of your communications in order to resolve the issue. But we cannot monitor the entire Services, and make no attempt to do so.

Company name

Authorized company representative name

Title

Signature

Date