

PRIMO DIALLER LLC
Robocall Mitigation Efforts
14 April 2025

1. Primo Dialler LLC commits to respond within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement and the industry traceback consortium and to cooperate with such entities in investigating and stopping any illegal robocallers from using its services to originate calls.
2. Using the questionnaire and onboarding procedures attached, Primo Dialler LLC screens all applicants for its services to determine if they are intending to use such services for autodialing from a database of numbers for purposes of telemarketing without having received written permission from the called parties. Calls to wireline numbers for purposes of political campaigning, market research or polling are deemed legal.
3. Primo Dialler LLC will block services to a customer if it determines that the customer is using the services for illegal robocalling.
4. Primo Dialler LLC will only accept traffic for termination from companies that are in the Robocall Mitigation Database after September 28, 2021.
5. Primo Dialler LLC uses no analytic systems, software or third-party vendors at this time to identify and block illegal robocall traffic.
6. Primo Dialler LLC's contracts with end users and upstream providers requires that they screen all applicants and users of their services to determine if such end users or upstream providers are intending to use their services for illegal robocalling, and that they block or terminate services for any users or upstream providers that use their services for the same.

ROBOCALL MITIGATION AND KNOW YOUR CUSTOMER QUESTIONNAIRE

Primo Dialler LLC is committed to compliance with the Telephone Customer Protection Act (TCPA), the TRACED Act (Telephone Robocall Abuse Criminal Enforcement and Deterrence) and the rules of the Federal Communications Commission pertaining to the prevention of illegal robocalling, fraudulent calling and other illegal use of its network. To that end, Primo Dialler LLC requires each customer to complete the following questionnaire to enable Primo Dialler LLC to properly conduct the necessary due diligence to comply with the law and protect its network.

For purposes of this form, the “Customer” is the entity subscribing to services from Primo Dialler LLC.

Question	Response
Entity Type	☐ Corporation ☐ LLC ☐ Individual ☐ Partnership ☐ Other:
Are you a wholesale provider (reselling our services to other carriers or to end users) or an end user?	☐ Wholesale provider ☐ End User
Legal Business Name (<i>attach screenshot of current good standing in your State/Country of incorporation</i>)	
Please provide a list of all corporate, business, trade, and fictitious names, aliases, DBAs under or through which your company, its principal(s), controlling person, or if privately held, the person with a majority ownership interest in your company have transacted business in the last three (3) years	
State/Country of Incorporation and Date of Incorporation	
Federal taxpayer identification number (EIN) (US entities)	
Your business description	
[End-User Customer only] Type of goods or services offered by your business, and the business name(s) you will use on your calls	
Business address (<i>attach screenshot of utility bill, lease, etc. showing your business's name associated with this address</i>)	
Billing address (if different)	

Websites and any social media pages used by you			
Current IP addresses and any IP addresses used by you over the past three years			
Customer Contact Information			
Authorized Individual Name (<i>attach photo of authorized individual's ID <u>and</u> screenshot or provide link establishing your link to company</i>)		Title	
Phone		Authorized Individual Email	
Billing Contact	Name: Email: Phone:		
[Wholesale Customer only] Compliance / Fraud Contact	Name: Email: Phone:		
[Wholesale Customer only] Rates Contact	Name: Email: Phone:		
[Wholesale Customer only] Support / NOC Contact	Name: Email: Phone:		
Compliance Questions			
Have you (or your owners or controlling persons) been a party in a civil lawsuit brought by either a private or government party relating to violating any state or federal laws or FCC Rules relating to illegal robocalling?	☐ Yes ☐ No If yes, please describe:		
Do you or your Clients use auto-diallers or engage in telemarketing?	☐ Yes ☐ No If yes, do you use telephone calls that deliver prerecorded messages? ☐ Yes ☐ No		
[End User Customer only] Do you filter traffic based on Federal "Do Not Call" List?	☐ Yes ☐ No		
[End User Customer only] Do you maintain your company-specific, internal Do Not Call list?	☐ Yes ☐ No		
[Wholesale Customer only] Do you impose contractual obligations on your customers or your own Upstream Providers to prohibit unlawful traffic?	☐ Yes ☐ No		

[Wholesale Customer only] Have you registered with the Robocall Mitigation Database (RMD)?	☐ Yes ☐ No If yes, provide the link to your current RMD filing (database is https://fccprod.servicenowservices.com/rmd?id=rmd_listings):
[Wholesale Customer only] Link to your company in the FCC 499 Filer Database (https://apps.fcc.gov/cgb/form499/499a.cfm)	
[Wholesale Customer only] Do you have contractual rights to suspend or terminate service if your customers fail to comply with the TCPA (47 USC 227)?	☐ Yes ☐ No
[Wholesale Customer only] Are you currently signing and attesting ALL outbound calls you originate for your end users?	☐ Yes ☐ No
[Wholesale Customer only] Do you originate / process conversational traffic?	☐ Yes ☐ No
[Wholesale Customer only] Do you originate / process autodialed call traffic?	☐ Yes ☐ No If yes, please describe:
[Wholesale Customer only] Do you have any direct autodialed Clients (call centres, notifications, collections etc)?	☐ Yes ☐ No
[Wholesale Customer only] Are any sources of autodialed traffic from non-US Clients?	☐ Yes ☐ No
[Wholesale Customer only] How many tracebacks have you received in the past 3, 6 and 12 months? (<i>Attach screenshot(s) showing your last 12 months' tracebacks from the ITG portal showing response times</i>)	

DOCUMENT REQUEST - Please attach the following documents to complete the KYC Process:

1. Proof of good standing in the place of formation not older than six months or if a new entity, proof of incorporation or formation such as copy of your certificate of incorporation.
2. Proof of address such as utility bill, lease, bank statement etc.
3. **[Wholesale Customer only]** Links to your FCC RMD and 499 Filer ID, and screenshot of past 12 months on ITG portal.
4. Proof that individual submitting this form is authorised to act on behalf of Customer, such as individual being listed in corporate records, pay stub, bio on company website or LinkedIn.

[Wholesale Customer Only] Customer is a wholesale provider and by ticking the boxes below, Customer represents and warrants to us, and agrees to the following:

☐ Customer agrees to notify us within 24 hours (i) if Customer is determined by US Telecom's Industry Traceback Group to be a "Non-Cooperative Voice Service Provider" or has been blocked from another voice service provider's network after being

determined to have violated laws or regulations pertaining to illegal robocalling, fraudulent calling, or illegal telemarketing practices or (ii) if Customer, or its owners or controlling persons, are subject to an adverse judgment in a civil lawsuit relating to the transiting of illegal robocalls.

☐ Customer agrees, upon our request, to promptly provide us with the identity of a client or end user of Customer that was the source of reportedly illegal call traffic Customer routed to us.

☐ Customer will screen existing clients and end users using questions substantially similar to those set forth in this Questionnaire, as applicable, and follow the practices described in its FCC Robocall Mitigation Plan.

CERTIFICATION

☐ By ticking this box, I certify that I am an officer of the Customer, and that the Customer has knowledge of the U.S. laws prohibiting the generation and transmission of unlawful voice calls, including but not limited to the Telephone Consumer Protection Act and Truth in Caller ID Act.

☐ By ticking this box, I confirm that the Customer complies with the above laws and consents to disclose all details if questions arise regarding potential violations of these laws.

☐ By ticking this box, I certify that Customer will respond promptly (within 24 hours at most) to all traceback requests and carrier complaints/inquiries and take effective steps to address any allegedly illegal traffic transmitted on its network.

☐ By ticking this box, I certify that I am an officer of the Customer who is authorized to legally bind the Customer to the provisions herein and further certify that the information set forth above is complete, true and accurate to the best of my knowledge and belief, and that I will provide a written, certified update to this Questionnaire within two business days in the event any of the information or responses above materially change.

NAME : _____

SIGNATURE : _____

DATE : _____

KNOW YOUR CUSTOMER ONBOARDING COMPLIANCE CHECKLIST

Customer Name: _____

Wholesale or End User: ☐ Wholesale ☐ End User

DUE DILIGENCE

- ☐ The Customer has provided a screenshot of current good standing not older than 6 months or if it is a new entity, their State-stamped certificate of incorporation.
- ☐ The Customer has provided proof of ID of their authorized representative (**end user only**).
- ☐ The Customer's authorized representative has provided proof of authorization to act on behalf of the Customer such as individual being listed in corporate records, pay stub, bio on company website or LinkedIn.
- ☐ Internet search using the Customer's name has been conducted.
- ☐ The Customer has an EIN (if a domestic US entity).
- ☐ Customer's business description and information provided is consistent with any public-facing media sources they disclosed.
- ☐ The Customer has provided proof of physical address such as screenshot of utility bill, lease, etc. showing its business's name associated with this address.
- ☐ The Customer's website and social media pages, if any, have been reviewed.
- ☐ IP address location of Customer has been identified.
- ☐ The Customer is compliant with US Laws pertaining to robocalls.

SCREENING RESULTS

Know Your Customer (KYC) Questionnaire received.

☐ Yes ☐ No

The Customer has provided all the material information and documentation requested.

☐ Yes ☐ No

All information provided by the Customer has been reviewed and is consistent with the documentation provided.

☐ Yes ☐ No

There is no contradictory information in Customer's public filings.

☐ Yes ☐ No

The Customer (or its owners or controlling persons) has not been a party in a civil lawsuit brought by either a private or government party relating to violating any state or federal laws or FCC Rules relating to illegal robocalling.

☐ Yes ☐ No

WHOLESALE CUSTOMERS ONLY

Customer is registered in the FCC 499 Filer Database.

☐Yes ☐No

The Customer had registered with the Robocall Mitigation Database (RMD) and provided a link to their current RMD Filing, which is a current certification (dated as recently as January 2024) and has a facially compliant mitigation plan (i.e., it topically addresses how they mitigate unlawful traffic, respond to tracebacks, etc.).

☐Yes ☐No

The Customer's STIR/SHAKEN Status matches the Customer's business activities and fits the right FCC classification applicable to the Customer.

☐Yes ☐No

The Customer has provided screenshot(s) of their past 12 months' history in their ITG portal.

☐Yes ☐No If yes, how many:

The Customer imposes contractual obligations on its customers or its own Upstream Providers to prohibit unlawful traffic.

☐Yes ☐No

The Customer has mechanisms in place to mitigate the risks arising from their customers' failure to comply with TCPA (47 USC 227), including those described in its FCC RMD plan.

☐Yes ☐No

Review completed by:

Name: _____ Date: _____

Review verified and approved by (if required):

Name: _____ Date: _____

Note: This checklist shall be scanned and saved in the Customer's file along with the Customer's responses to the Know Your Customer (KYC) Questionnaire. If any responses in the Screening Results are NO, Customer will be rejected pending review and approval by senior management after satisfactorily resolving any issues flagged by the Screening Results.