

8x8 Inc. Robocall Mitigation Plan

Last Updated: February 20, 2026

Plan Owner: Associate General Counsel, Regulatory

1. Overview and Purpose

8x8 Inc. (“8x8”) submits this Robocall Mitigation Plan (“Plan”) pursuant to 47 C.F.R. § 64.6305.¹ 8x8 provides Unified Communications as a Service (“UCaaS”), Contact Center as a Service (“CCaaS”), and Communications Platform as a Service (“CPaaS”) to business customers and authorized resellers. This Plan describes 8x8’s efforts to mitigate illegal robocalls consistent with the FCC’s rules.

8x8 may modify, add, or otherwise alter any part of this Plan to respond to changes in its business, technologies, or regulations. 8x8 will update this Plan within ten (10) business days following any such changes.

2. 8x8’s Roles in the Call Chain

8x8 operates as a voice service provider with a STIR/SHAKEN implementation obligation when it provides VoIP services as part of its UCaaS, CCaaS, or CPaaS offerings. This includes providing authentication for traffic originated by its direct end-users and its authorized resellers.

3. STIR/SHAKEN Implementation Status

As a voice service provider serving end-users, 8x8 completed full implementation of the STIR/SHAKEN Caller ID Authentication Framework across its network as of June 23, 2021. 8x8 provides A-level attestation for assigned numbers where 8x8 or its authorized resellers have a verified relationship with the end customer.

4. Acceptable Use and Contractual Flow-Down

4.1 Use Policy

8x8 maintains a Use Policy that bars end-users (8x8 direct customers or reseller end-users) from using services for illegal or fraudulent activities. End-users agree to comply with all Laws, avoid facilitating

¹ Our original plan also included 8x8, Inc.’s wholly owned subsidiary Fuze, Inc. As of December 31, 2025, we ceased operating the Fuze, Inc. network. All customers on the Fuze, Inc. network were either transferred to the 8x8, Inc. network or to third party providers.

criminal conduct, and refrain from transmitting misleading caller ID information. The Use Policy is incorporated by reference into 8x8's direct customer agreement. The Use Policy can be found at: <https://www.8x8.com/terms-and-conditions/use-policy>.

4.2 Reseller MSA & Vicarious Liability

For traffic originated via resellers, 8x8 enforces compliance through its Reseller Master Services Agreement (MSA). The MSA incorporates the Use Policy by reference.

- **Intermediary Responsibility:** Resellers must ensure that any intermediaries or end-customers comply with the Agreement as if they were the Reseller.
- **Liability:** A reseller is responsible for the actions or omissions of its intermediaries and end-users as if the reseller itself had committed them.
- **Breach of Policy:** Any actual or alleged breach of the Use Policy by a reseller's end-user is treated as a breach by the Reseller, allowing 8x8 to seek indemnification or terminate the agreement.

5. Customer Vetting and Onboarding

5.1 Direct Customer Vetting

8x8 maintains procedures that apply to the signing up of customers. Customers are required to provide 8x8, and maintain, accurate and complete information about themselves. For example, the Use Policy requires customers (1) to ensure all account and registration information, including the customer's legal name and contact information, is accurate, legal, legally obtained, and complete, (2) promptly update such information as needed to ensure its accuracy, and (3) promptly verify such information on 8x8's request. 8x8 also uses third-party verification tools to validate customer information, including legal names and contact details. 8x8 monitors IP addresses and device logins to identify anomalous behavior during the order process.

5.2 Reseller Vetting and Certification

8x8 employs additional safeguards for the authorized resale of its solutions:

- **Regulatory Compliance:** Resellers must maintain active telecommunications licenses as required by Law.
- **Mandatory Training:** Resellers must have certified staff, including at least two individuals with "Support Certification" to handle initial troubleshooting and triage.
- **KYC:** 8x8 reserves the right to request details of any intermediaries used by the reseller to maintain visibility into the call chain.

6. Upstream Provider Vetting

8x8's upstream provider relationships are limited in scope. 8x8 accepts inbound voice traffic from a small number of Competitive Local Exchange Carriers ("CLECs") that 8x8 contracts with to provide 8x8 with telephone number resources and inbound call termination services. Consistent with 47 C.F.R. § 64.6305(g), 8x8 verifies that each CLEC from which it accepts inbound traffic has an active, non-delisted filing in the FCC's Robocall Mitigation Database ("RMD"). 8x8 periodically re-verifies the RMD status of these providers and will promptly address any situation in which a provider's filing is de-listed or removed pursuant to an enforcement action, including by suspending acceptance of traffic from that provider pending resolution.

7. Authentication, Monitoring, and Mitigation

8x8 monitors its voice traffic in real-time 24 hours a day/7 days a week using dedicated tooling monitored by the Fraud Operations and Network Operations Center teams. This monitoring is used to identify, investigate, and address any abnormal traffic patterns (e.g. call volume spikes, increased short duration calls) or other unusual behavior. The Fraud Operations team will immediately terminate a customer if the team confirms that a customer has used 8x8's services to violate laws or to facilitate fraud. In addition to voice traffic monitoring, the Fraud Operations team employs SMS monitoring tools to prevent misuse of the SMS capabilities in 8x8's services.

8. Traceback and Regulatory Cooperation

8.1 Commitments

8x8 commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG).

8.2 Reseller Cooperation

- **Direct Cooperation:** If 8x8 or a reseller is notified of a potential violation, the reseller must promptly address the issue with its customer and cooperate with 8x8 to resolve the matter.
- **Remedial Action:** Repeated incidents of downstream customers violating telemarketing or robocalling rules may result in 8x8 terminating the entire resale relationship.

9. Ownership and Management

8x8, Inc. is a publicly-traded company (Nasdaq: EGHT) with no parent company. Information regarding 8x8's management team and Board of Directors can be found on 8x8's website at:

<https://www.8x8.com/about-us/management>.

As of February 20, 2026, 8x8 has the following subsidiaries and affiliates:

Name	Jurisdiction
8x8 International Holdings Co.	Delaware

8x8 International ULC	Canada
8x8 International Pty Ltd.	Australia
8x8 UK Limited	United Kingdom
API Telecom Limited	United Kingdom
8x8 NL Solutions B.V.	Netherlands
8x8 Communications CX Solutions Limited	Ireland
8x8 International SRL	Romania
8x8 Japan GK	Japan
8x8 Servicios Mexico, S.R.L. de C.V.	Mexico
8x8 UK Investments Limited	United Kingdom
DXI Limited	United Kingdom
8x8 India Private Limited	India
8x8 International Pte. Ltd.	Singapore
PT Eight Solutions Indonesia	Indonesia
8x8 Philippines, Inc.	Philippines
8x8 (Thailand) Limited	Thailand

Neither 8x8, Inc. nor any of its subsidiaries or affiliates have been subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.