

BELL CANADA ROBOCALL MITIGATION PROGRAM

12 August 2026

Introduction

Bell Canada's "Robocall Mitigation Program" can reasonably be expected to significantly reduce the origination of illegal robocalls. As detailed below, Bell Canada commits, to the extent reasonable and in compliance with all applicable legal and regulatory requirements and obligations, to:

1. Take the reasonable steps set out below to avoid originating illegal robocall traffic;
2. Take affirmative, effective measures to prevent new and renewing customers from originating illegal calls;
3. Respond fully, within 24 hours, to all traceback requests from the Federal Communication Commission (Commission), law enforcement, and the industry traceback consortium; and
4. Cooperate with the aforementioned entities in investigating and stopping any illegal and identified robocallers that use its service to originate calls.

Canadian Regulatory Framework

Bell Canada is a foreign service provider. Specifically, Bell Canada is a Canadian carrier and telecommunications service provider subject to the Canadian *Telecommunications Act* (S.C. 1993, c. 38) (*the Telecommunications Act*) and to the regulatory authority of Canada's federal communications regulator, the Canadian Radio-television and Telecommunications Commission (CRTC). As a result, our ability to take action with respect to illegal robocalls is constrained by our obligations to comply with the *Telecommunications Act* and by the CRTC.

In particular, we note the prohibition set out in section 36 of the *Telecommunications Act*, which states:

36. Except where the Commission approves otherwise, a Canadian carrier shall not control the content or influence the meaning or purpose of telecommunications carried by it for the public.¹

Despite these constraints, Bell Canada has demonstrated its commitment to being an industry leader in making our networks secure and protecting our customers from various types of unlawful activities, most notably fraud, scam, and nuisance calling. Over the past 10 years we have been among the private sector leaders working with and within a number of organizations to identify and share critical intelligence to combat cyber threats. As further described below, we have also applied for and received authority from the CRTC to block certain fraudulent and scam calls.

STIR/SHAKEN

As noted above, Bell Canada is a foreign service provider. As a foreign service provider, Bell Canada does not have a service provider code (SPC) token issued by a U.S. administrator. However, Bell Canada participates with the Canadian Secure Token Governance Authority and the Canadian Secure Telephone Identity Policy Administrator and has a SPC token issued and overseen by those Canadian entities. Bell Canada has taken steps to implement and operationalize STIR/SHAKEN in a manner consistent with the policies, practices and procedures of the Canadian Radio-television and Telecommunications Commission,

¹ Telecommunications Act (S.C. 1993, c. 38) at s 36.

the Canadian Secure Token Governance Authority and the Canadian Secure Telephone Identity Policy Administrator.

Participation in Industry Groups

Bell Canada maintains a dedicated corporate security and fraud detection and compliance team.

We participate in and communicate with a number of industry groups aimed at eliminating illegal and fraudulent calling. For instance:

- As described further below, we participate in the Industry Traceback Group (ITB Group), and we were the first non-U.S. based member of the ITB Group;
- We actively participate in the traceback process established by the CRTC in Compliance and Enforcement and Telecom Decision CRTC 2021-268;
- We regularly engage with the Canadian Centre for Cyber Security, Canada's leading expert body on cyber security for government and non-governmental infrastructure, on various matters relating to ongoing cyber threats; and
- We are active members of the Canadian Security Telecommunications Advisory Committee, which meets quarterly to discuss security matters of common interest and has proven to be an important forum in which telecommunication service providers (TSPs) can share emerging cyber threats relating to Canada's telecommunications networks.

Robocall Mitigation Measures

We have implemented a number of robocall mitigation measures that can reasonably be expected to reduce the origination of illegal robocalls on our network. Since December 2019, we have prevented over 6 billion fraudulent and scam calls from reaching end-users. As noted above, within the context of the *Telecommunications Act* and CRTC regulatory oversight, we have demonstrated our commitment to being an industry leader in making our networks secure and protecting our customers from various types of unlawful activities. The robocall mitigation measures we deploy include the following:

- Pursuant to Compliance and Enforcement and Telecom Regulatory Policy CRTC 2018-484, *Implementation of universal network-level blocking of calls with blatantly illegitimate caller identification*, since December 2019 we have implemented call blocking for all inbound calls (both terminating on and transiting our network) with originating telephone numbers that do not conform with the North American Numbering Plan.
 - o Bell Canada uses a number of sources to identify originating telephone numbers that do not conform with the North American Numbering Plan, including those that are unassigned. Those sources include the following:
 - Unassigned Number Plan Area (NPA) listed at www.nanpa.com;
 - Unassigned Canadian NPAs listed at www.cnac.ca;
 - The RealNumber DNO service provided by SOMOS Inc. RealNumber DNO service provided by SOMOS Inc.; and
 - Information from TransUnion on unassigned and non-conforming international originating numbers.
- Pursuant to Compliance and Enforcement and Telecom Decision CRTC 2020-125: *Bell Canada – Application to block Wangiri fraud calls*, during the early days of the COVID-19 global pandemic, we applied for and received approval from the CRTC to voluntarily block verified Wangiri fraud calls

received or transmitted from, to, or over our networks for a six-week trial period. After the expiry of the trial, we continued such blocking within the scope of the approval granted by the CRTC in the context of our application to block certain other fraudulent and scam voice calls (which includes Wangiri fraud), described below.

- Pursuant to Compliance and Enforcement and Telecom Decision CRTC 2020-185: *Bell Canada – Application to allow Bell Canada and its affiliates to block certain fraudulent and scam voice calls on a trial basis*, we voluntarily applied for and received approval from the CRTC to block certain fraudulent and scam voice calls during a 90-day trial. In implementing this call blocking process, we monitored network traffic, leveraging artificial intelligence to analyze voice telecommunications traffic in order to flag anomalies that suggest possible fraudulent and scam activity. This call-blocking process is implemented at a network-wide level, including all calls originating on, terminating on, or transiting our network.
- Following CETD 2020-185, and pursuant to Compliance and Enforcement and Telecom Decision CRTC 2020-353, *Bell Canada – Request to extend its trial to block certain fraudulent and scam voice calls*, the CRTC approved our voluntary request to extend the duration of our trial indefinitely until the CRTC had issued its decision regarding our application to make the call blocking mechanism permanent as discussed below.
- Pursuant to *Compliance and Enforcement and Telecom Decision CRTC 2021-403, Bell Canada – Application to allow Bell Canada and its affiliates to block certain fraudulent and scam voice calls on a permanent basis*, the CRTC approved our voluntary application to allow us to transition our call-blocking mechanism from a trial to a permanent measure. In compliance with the CRTC's directives, we file annual reports on the call-blocking mechanism. As of the date of the CRTC's decision, we were the only Canadian telecommunications service provider to have applied for, or received, such approval.
- Bell Canada has been a key contributor to the development of the network-level botnet blocking framework, as set out in Compliance and Enforcement and Telecom Decision CRTC 2022-170 - *Development of a network-level blocking framework to limit botnet traffic and strengthen Canadians' online safety*, which established the guiding principles for regulatory action. With the release of Compliance and Enforcement and Telecom Decision CRTC 2025-142 - *Development of a framework to limit botnet traffic*, which established the framework, we continue to participate in industry discussions and in the ongoing consultation on potential modifications and enhancements, including Compliance and Enforcement and Telecom Notice of Consultation CRTC 2025-143 - *Call for comments – Proposed modifications to the framework to limit botnet traffic*.
- We offer customers a 'Do Not Originate' service option, in which customers can elect not to have any calls originate from their telephone number. Such an option is intended to address call spoofing.
- We also offer certain customers the option to subscribe to a 'Wireline Call Privacy Service', which blocks incoming calls originating from calling line identification tagged as either "private" or "unknown".

Bell Canada does not currently utilize third-party analytics vendors for the blocking of illegal robocall traffic. Bell Canada does use third-party analytics provided by Neustar Information Services, Inc. to help identify and label suspicious calls.

Responding to Traceback Requests

We continue to be an active participant of the ITB Group and have been for a number of years. We actively respond to ITB Group traceback requests. We likewise will respond to requests from the Commission and

law enforcement within the bounds of Canadian regulatory requirements, U.S. regulatory requirements, and our contractual obligations.

We actively participate in the traceback process established by the CRTC in Compliance and Enforcement and Telecom Decision CRTC 2021-268.

We have also implemented the ITB Group's Do Not Originate List, which is aimed at preventing scammers from being able to spoof numbers belonging to government agencies, charities, and other legitimate organizations.

Illegal Robocall Traffic Identified by the FCC

We monitor FCC communications and guidance regarding illegal robocalls. If we become aware that a voice service provider we interconnect with is the recipient of a cease-and-desist letters from the FCC with respect to illegal robocall traffic, we will take steps to investigate the traffic we carry from that voice service provider and our contractual relationship with that voice service provider.

If the FCC authorizes voice service providers to block all traffic from a voice service provider, and if we carry such traffic, then we will consider our ability to stop carrying the offending traffic, within the bounds of the above-noted Canadian regulatory requirements, U.S. regulatory requirements, and our contractual obligations. To the extent permitted by such requirements and obligations, such steps may include terminating our relationship with that voice service provider.

Know Your Customer

In order to vet the identity of our carrier and wholesale customers, customers are subject to a vetting program including a credit check and financial performance review. Carrier customers are also subject to a reference check. Carrier and wholesale customers may also be vetted through discovery sessions with a specialist in sales and product, as needed. We require signed contracts by an authorized representative of the customer before providing service.

Business retail customers are subject to a vetting process in which we conduct a credit check and make further inquiries as warranted. We require signed contracts by an authorized representative of the customer before providing service. Residential and postpaid retail wireless customers are similarly subject to a credit check; they are also required to provide identification information and agree to our terms of service before service is provided.

Policies and Contract Terms

In our contracts with carrier and wholesale customers, we endeavour to include provisions regarding defective and fraudulent calls, legal compliance, and suspension of service. Specific contractual provisions may change depending on the specific contract and the contracting party. Our standard wholesale forborne terms of service also contain restrictions on use of service, which specifically prohibit use of service that is illegal, abusive use of services, or in violation of applicable laws.

Our standard form of contract with retail business customers prohibits inappropriate uses of our services, including use of the services in a manner that violates applicable laws or interferes with our networks. Our standard form of agreement with retail business customers also requires compliance with an acceptable use policy, which further prohibits inappropriate or illegal use of the service. As per above, specific contractual provisions may change depending on the specific contract and contracting party.

For forborne services, our standard terms of service for residential, wireless, and business retail customers includes a responsible use policy, which prohibits customers from using the service for certain abusive or inappropriate purposes. Retail customers are also specifically prohibited from using the services in a manner that is illegal or that would cause interference with our network operations, including by preventing a fair and proportionate use by others.

For regulated services, our General Tariff contains terms of service, which prohibit customers from using the services in a manner that is contrary to law or for the purpose of making annoying or offensive calls.² Customers are also prohibited from using the Company's services or permitting them to be used so as to prevent a fair and proportionate use by others.

² Bell Canada General Tariff CRTC 6716 Item 10 sections 8.2 and 8.3.

Corporate Affiliations

The following information is accurate as of the date of filing.

Parent Companies – BCE Inc. holds 100% of the voting securities of Bell Canada, both directly and indirectly through BCE Inc.'s wholly-owned subsidiary, Bell MTS Inc.

Subsidiaries – Bell Canada's subsidiaries³ are as follows:

- 10558532 Canada Inc.
- 11560948 Canada Inc.
- 12188104 Canada Inc.
- 12188147 Canada Inc.
- 17727283 Canada Inc.
- 2538705 Ontario Inc.
- 2953285 Canada Inc.
- 3578704 Canada Inc.
- 3922111 Canada Inc.
- 3922120 Canada Inc.
- 559733 British Columbia Ltd
- 6991050 Canada Inc.
- 7043597 Canada Inc.
- 7211431 Canada Inc.
- 8384819 Canada Inc.
- 8983089 Canada Inc.
- 9106-7645 Québec Inc. (dba MTL Grandé Studios)
- 9253-4270 Québec inc. (Octane)
- AAA Alarm Systems Ltd.
- Agincourt Productions Inc.
- AlarmForce Industries Inc. – Industries AlarmForce Inc.
- Astral JCDecaux Street Furniture Canada Ltd.
- Astral JCDecaux Street Furniture Canada LP
- Astral Média Affichage, S.E.C./Astral Media Outdoor, L.P.
- Astral Media Outdoor Inc.
- Astral Media Outdoor (Toronto) G.P.
- BCE Canco Inc.
- BCE Global Technology Centre Private Limited
- BCE Holding Corporation
- BCE Nexxia Corporate Services Inc.
- BCE Nexxia Corporation
- BCE Nexxia International Inc.
- BCE Nexxia Voice Services Corporation
- BCE Services Inc.
- Bell Channels Inc. – Bell Canaux de distribution inc.
- Bell Cyber Inc.
- Bell ExpressVu Inc.

³ Direct and indirect subsidiaries with more than 10% equity ownership. Non equity based investments, inactive companies, and companies in bankruptcy are excluded.

- Bell ExpressVu Limited Partnership
- Bell Fund
- Bell General Partnership
- Bell Internet Companies Group Inc. – Groupe des Compagnies Bell Internet Inc.
- Bell Média Radio Atlantique Inc. / Bell Media Radio Atlantic Inc.
- Bell Media Regional Radio Partnership
- Bell Média inc. - Bell Media Inc.
- Bell Mobility Holdings Inc. – Holding Bell Mobilité Inc.
- Bell Mobility Inc. – Bell Mobilité Inc.
- Bell Technical Solutions Inc. – Bell Solutions techniques inc.
- Bell Ventures Inc. – Bell Capital de risque inc.
- Bell Wireless Alliance Services Inc.
- Bimcor Inc.
- Câblevision du Nord de Québec Inc.
- Canadian LNP Consortium Inc.
- CloudKettle Inc.
- CloudKettle USA, Inc.
- CNexia S.A.S.
- CTV Nature Canada Company
- CTV Specialty Sports Holding Inc.
- CTV Specialty Television Inc.
- CTV Specialty Television Enterprises Inc.
- CTV Wild Canada Company
- Dome Productions Inc.
- Dome Productions Partnership
- EnStream Inc.
- EnStream LP
- Environics Analytics Group Ltd.
- Environics Analytics Inc.
- Epic Information Solutions Inc.
- Exploration Production Inc.
- Exploration Distribution Inc.
- FXInnovation Conseil Inc.
- Group Maskatel Québec L.P. / Groupe Maskatel Québec S.E.C.
- Groupe Conseil FXInnovation Inc.
- HGC Technologies Corp.
- Info-Excavation
- iTel Networks Inc.
- JMServu Inc.
- Les Éditions Studio V Inc.
- Les Éditions Musicales L.M.S. Limitée
- Le Réseau des Sports (RDS) Inc.
- Master FM Limited
- Marine Cable Corporation
- Métromédia CMR Plus Inc.
- Network Fiberco LLC
- NFC Management, LLC
- NFC Northwest, LLC

- Northern Lights General Partnership
- NorthernTel, Limited Partnership
- Northwest Fiber Management, LLC
- Northwest Fiber Ultimate Holdings, LLC
- Northwest Fiber, LLC
- Northwestel Inc.
- Orion Wireless Partnership - Societe Orion Sans Fil
- PAMT Consulting Inc.
- SDK Tek Services Ltd.
- Sphère Abacus International Inc.
- Sphère Abacus Ltd.
- Sphère Abacus UK Ltd.
- Sphère Média inc. Sphere Media Inc.
- Stentor Resource Centre Inc. – Centre de Ressources Stentor Inc.
- Tahltan River Communications Inc.
- Télébec, Limited Partnership
- TelNorth Limited Partner Inc. – TélNorth Commanditaire inc.
- The Source (Bell) Electronics Inc.
- The Sports Network Inc.
- TotalTV Inc.
- Wholesail Networks LLC
- Willow Receivables General Partner Inc.
- Willow Receivables Limited Partnership
- WNC Wholesail Networks Canada Inc
- Yawize SARL
- Ziplly Fiber Northwest, LLC
- Ziplly Fiber of Idaho, LLC
- Ziplly Fiber of Montana, LLC
- Ziplly Fiber of Oregon, LLC
- Ziplly Fiber Pacific, LLC
- Ziplly Wireless, LLC
- Zone3 Inc.

Affiliates – Bell Canada’s affiliates⁴ are as follows:

BCE Inc.

- 4458737 Canada Inc.
- Bell MTS Inc.
- CH Group Limited Partnership
- GLENTEL Inc.
- Mobicom Golfo Ltd.
- Mobicom Centro Ltd.

Principals – Bell Canada’s principals are as follows:

Directors

Name	Function
Bibic, Mirko	Director
Dexter, Robert P.	Director
Heintel, Rebecca Mary	Director
Leroux, Monique F.	Director
Murray, Sheila A.	Director
Pagnutti, Louis P.	Director
Rovinescu, Calin	Director
Sheriff, Karen H.	Director
Tory, Jennifer A.	Director
Vachon, Louis	Director
Weed, Steven	Director
Wibergh, Johan	Director
Wright, Cornell C.V.	Director

Officers

Name	Function
Bibic, Mirko	President and Chief Executive Officer
Chaumont, Thierry	Senior Vice-President, Controller and Tax
Cohan, Sean	President, Bell Media
Hassaan, Hadeer	Executive Vice-President and Chief Information and Customer Experience Officer
Kirby, M. Blaik	Group President, Consumer and Small and Medium Business (SMB)
Lithwick, Devorah	Senior Vice President and Chief Brand Officer

⁴ Direct and indirect affiliates with more than 10% equity ownership. Non equity based investments, inactive companies, and companies in bankruptcy are excluded.

Name	Function
Malcolmson, Robert W.	EVP and Chief Legal & Regulatory Officer
McDonald, Mark	Executive Vice-President and Chief Technology Officer
Millen, Curtis J.E.	Executive Vice-President and CFO
Moffat, Nikki	Chief Human Resources Officer and Executive Vice-President, Corporate Services
Moses, Karine	Senior Vice-President, Sales and Vice Chair, Québec
Somers, Krishna	Senior Vice-President, Treasurer, Investor Relations
Watson, John A.	Group President, Business Markets, AI and FXInnovation