



A1 Telekom Austria AG - Robocall Mitigation Plan

1 About A1 Telekom Austria AG

A1 Telekom Austria AG (hereinafter "A1") is a fully owned subsidiary of Telekom Austria AG which is listed on Vienna's Stock Exchange. A1 together with its subsidiaries is a leading provider of digital services and communications solutions in central and eastern Europe with around 25 million customers, currently providing (among other services) voice services in seven countries: Austria, Bulgaria, Croatia, Belarus, Slovenia, the Republic of North Macedonia and the Republic of Serbia.

Offering communication, payment, and entertainment services as well as integrated business solutions, A1 achieved revenues of 4.55 billion Euros by year end 2020. Almost 18,000 employees and state of the art broadband infrastructure make digital business and lifestyle possible and enable people, companies, and machines to stay connected. As European unit of América Móvil, one of the largest wireless services providers in the world, A1 is headquartered in Vienna and provides global solutions.

2 A1's traffic to the US (no transit)

A1 only sends voice traffic to the US that originates in the networks of its subsidiaries and uses carriers for this purpose that have implemented STIR-SHAKEN.

3 A1's Fight Against Unlawful Robocalls

A1 is committed to prevent, as much as reasonably possible unlawful robocalls originating in its network as well as to monitor incoming calls received from other carriers.

In its fight against unlawful robocalls A1 cooperates in good faith with its wholesale partners and competent law enforcement authorities in investigating any suspicious activity. As much as A1 expects to receive answers to its traceback requests it is willing to respond to such requests and put a stop to unlawful robocalls.

4 A1's Fraud Mitigation Activities

4.1 Dedicated Anti-Fraud Solutions and Systems

A1 deploys a variety of systems and solutions to monitor, detect and suppress any kind of potentially fraudulent traffic (including unlawful robocalls), either originating within its own network or being transited through its network. These solutions include:

- 24x7 Monitoring
- Blacklists (blocking A-numbers and/or B-numbers)
- Dedicated fraud-preventing system
- Dedicated SIM box detection and A-number-verification system
- Dedicated anti-Wangiri detection system

4.2 Dedicated Anti-Fraud Analysts

A1 takes proactive stance in fighting any potential fraudulent traffic. For this purpose, A1 entertains dedicated resources (involving retail, wholesale and networking departments) with the sole goal of avoiding any potential fraud scenarios and dealing with them if they arise.

4.3 Contractual Anti-Fraud Clause Wholesale

Both national and international interconnection contracts contain a comprehensive anti-fraud clause allowing A1 to extensively monitor any suspicious traffic and to act accordingly by suspending the wholesale payment flow and/or blocking and/or suspending repeat offenders.

4.4 Contractual Anti-Fraud Clause Retail

All current retail-based contracts contain an anti-fraud clause detailing which call behaviour will not be tolerated by A1. Violators can have their service suspended or even their contract terminated.

5 Participation in Telco-Industry-Wide Fraud-Mitigation Activities

A1 is an active member of ITW Global Leaders' Forum (GLF) and has signed its Code of Conduct for International Carriers to take leadership in the prevention of fraud traffic. Based on this Code of Conduct A1 has to obey and comply with these six principles:

1. Targets for prevention of fraudulent traffic to be included within management reporting.
2. Carriers to adhere to i3 Forum recommended processes to detect and avoid fraud.
3. Identified fraudulent number ranges and destinations to be blocked.

4. All reasonable action to be taken to avoid payment flows to the instigators of fraudulent traffic.
5. Commitment to share information regarding fraudulent traffic flows with other carrier peers.
6. Adoption of standard contracting terms addressing fraudulent traffic management.
7. Revenue Share Numbers Providing clients with the option to opt-out from specific number ranges.

The GLF Forum has certified that A1 complies with the GLF Forum's Code of Conduct against fraud.