

RingCentral, Inc.

Robocall Mitigation Plan

RingCentral, Inc. ("RingCentral") is committed to minimizing the number of robocalls that originate on its network and preventing unwanted robocalls from reaching RingCentral end users. To this end, RingCentral has implemented this Robocall Mitigation Plan ("the Plan").

Know Your Customer Procedures.

RingCentral requires new and renewing customers to provide and maintain accurate information, including legal name and contact details, and to update and verify this information as needed. RingCentral uses analytics to help identify suspicious information. As described below, RingCentral continuously monitors its network for suspicious activity. RingCentral requires all resellers to institute affirmative, effective measures to know the identity of resellers' customers and their right to use telephone number resources.

Know Your Upstream Provider Procedures

RingCentral contracts with a small number of respected upstream providers. Both RingCentral and the providers are contractually obligated to offer service in compliance with all applicable laws and regulations, including but not limited to the laws and regulations related to robocalling.

RingCentral only accepts traffic from immediate upstream providers that are listed in the Robocall Mitigation Database and does not knowingly accept traffic from providers who are not listed in the Robocall Mitigation Database.

Customer Compliance with Robocalling Rules and Existing Law.

RingCentral requires end customers to comply with RingCentral's Terms of Service, including RingCentral's Acceptable Use Policy ("AUP"). The AUP requires customers to use RingCentral services in compliance with the law and prohibits, among other things, illegal call spoofing, fraud, and use of automatic or predictive dialing without the called party's prior consent.

Active Monitoring of Network for Fraud

RingCentral monitors its network for suspicious calling patterns; promptly investigates any alerts related to illegal, abusive, or otherwise unacceptable behavior; and applies consistent processes and standards to any allegations of service abuse and acts fairly and transparently toward our customers. After investigation, RingCentral makes a determination of the appropriate action, which may include denial of service, suspension of service, termination of service, and no action. RingCentral is able to immediately impose its action upon customers without any delay.

In addition, RingCentral uses internally developed analytics to detect potential illegal calls or robocalls targeting RingCentral customers and allows its customers to choose which of these calls to receive.

Full and Timely Compliance with Traceback Requests

RingCentral responds to traceback requests within 24 hours of receiving the request, as required by the Federal Communications Commission rules. RingCentral requires all resellers and upstream providers to comply with all traceback efforts, whether initiated by the Federal Communications Commission, the designated Industry Traceback Group, law enforcement, or by any other applicable voice service provider or interested party.

When a traceback request is made or any other credible complaint brought to its attention, RingCentral promptly investigates the suspect traffic to determine the call path(s) and whether the traffic is likely to be illegal robocalling. If the traffic is deemed highly likely to be illegal, RingCentral takes appropriate steps to ensure that the suspicious traffic does not continue, including terminating the caller's access to RingCentral's network.

STIR/SHAKEN Implementation.

RingCentral has implemented STIR/SHAKEN throughout its network and signs calls pursuant to ATIS standards. To this end, calls from RingCentral customers using RingCentral assigned numbers are attested as an A. Calls from RingCentral customers using third party numbers are signed with a B attestation unless RingCentral verifies the customer's right to use the third party numbers.

Affiliates

RingCentral, Inc. is a publicly traded corporation. Both Vlad Shumnis and Vlad Vendrow own more than 10% of RingCentral stock. In addition, Mr. Shumnis is RingCentral's Chief Executive Officer and manages and controls RingCentral's businesses.

RingCentral wholly owns voice service providers RCLEC, Inc., Connect First, Inc., and RingCentral MiCloud & Sky, LLC. All three entities are listed in the Robocall Mitigation Database and have published a Robocall Mitigation Plan.

Neither RingCentral, RCLEC, Connect First, RingCentral MiCloud & Sky, Mr. Vendrow, nor Mr. Shumnis 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.