

NTC INTERNATIONAL, INC. ROBOCALL MITIGATION PLAN:

1. **NTC International, INC.** (hereinafter referred to as the “Company” or “NTC”), 100% owned by NTC Holding, Inc. (sole Shareholder), is a company organized and existing under the laws of Delaware, having a business address at 1000 N. West Street, Ste. 1200, Wilmington, Delaware 19801 USA.
2. NTC International, INC. is a voice service provider which carries traffic to and for its customers, using Voice Over Internet Protocol (VOIP).
3. NTC has fully implemented STIR/SHAKEN for calls originated on our network and as a Gateway provider only where the foreign carrier has complied with FCC requirements including being present in the Robocall Mitigation Database as required. NTC uses STIR/SHAKEN for 100% of the voice traffic on the NTC network. The attention applied for all calls that are reaching NTC’s network is Gateway Attestation (C). Also, all the calls that are coming with attestation already, NTC allows pass-through any certificates as received from our customers.
4. NTC uses several monitoring systems and alerts in order to detect and block any illegal activity in our network: analyzes and reports unusual traffic sent by any customer every hour, comparing such things as outbound call volume, short duration call percentage, calls that receive SIP Code 403/487 percentage. Each variable will trigger an internal alert and by all means, specialized fraud team will block and notify the customer on each of those, as below:
 - a. If the percentage of short duration calls (calls less than 6 seconds) exceeds more than 15% and over 100 calls in any one-hour period;
 - b. If the combined percentage of SIP Code 403, 487 exceeds 30% and over 100 calls in any one-hour period;
 - c. Repeated calls to a phone number or similar phone numbers.
5. NTC commits to respond to all trace back requests from the Commission, law enforcement, and industry trace back consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. We have established a 24/7 available email address for creating tickets with the highest priority requiring a response within one business hour. We keep Call Detail Records for a period of one calendar year. The moment we receive any complaints, we answer on a timely manner (no more than within 24 hours) by notifying also the client and US Telecom Group. We also work with individual carriers to facilitate traceback and bad actor identification. NTC also requires our customer cooperation in traceback requests. We accept USA originated traffic from RMD applications providers only.
6. NTC, has implemented an automated system to enhance network security measures. This system is designed to block traffic originating from ANIs listed in the DNO (Do Not Originate) database provided by US Telecom. By leveraging advanced technology, NTC's automated system

proactively identifies and intercepts communication attempts from flagged ANIs, thereby mitigating potential risks such as fraudulent activities, spam, and malicious traffic. This strategic approach not only safeguards the integrity of the network but also fosters a secure telecommunications environment for users and stakeholders. NTC's commitment to utilizing innovative solutions underscores its dedication to delivering reliable and trustworthy services in the telecommunications sector.

7. Each new NTC customer is required to undergo an extensive onboarding procedure designed by the company's commercial and legal departments. This process encompasses various stages, including completion of the Know Your Customer (KYC) form, as well as comprehensive identity verification, credit assessment, and financial statement analysis. Additionally, a thorough compliance review is conducted against the Robocalling Mitigation Database and in accordance with Federal Communications Commission (FCC) regulations.
8. Contact details of the person within the company responsible for addressing robocall mitigation-related issues:
 - Name: Giuseppe Giurfa;
 - Title: Director;
 - Business address: 1000 N. West Street, Ste. 1200, Wilmington, Delaware 19801 USA;
 - Telephone number: +1800 398 0521;
 - Email address: giuseppe.giurfa@ntcinternationalinc.com.
9. NTC has appointed Giuseppe Giurfa, Director, as the individual responsible for managing multi-factor authentication (MFA) and maintaining CORES credentials associated with the Company. Mr. Giurfa ensures that all CORES credentials are securely linked to his device, maintains access control, and promptly updates credential information as required by FCC rules. He oversees that only authorized personnel can access FCC systems and that MFA protocols are consistently enforced.
10. NTC's legal, compliance, and technical teams coordinate on an ongoing basis to ensure consistency between the Company's Robocall Mitigation Database (RMD) filing and operational practices. This coordination includes regular reviews of corporate identifiers, customer onboarding procedures, robocall monitoring, STIR/SHAKEN implementation, and trace-back processes. Any updates to operational practices or changes in personnel are promptly reflected in the RMD filing to ensure accurate and up-to-date compliance information is maintained.

NTC INTERNATIONAL, INC.

By:


Signature

February 26th, 2026

date

Name: Giuseppe Giurfa

Title: Director