



OTE International Solutions (OTEGLOBE), established in Year 2000, provides VOICE & DATA Wholesale Telecommunication transit Services to the International market. OTEGLOBE is based in Greece, Athens. Among wholesale voice traffic services, OTEGLOBE as a subsidiary of OTE Group in Greece manages Group's International organic Voice traffic.

For the protection of OTEGLOBE's Services, Customers & Vendors and to mitigate fraudulent traffic including but not limited to unsolicited calls, robocalls, spam calls, one-ring calls, OTEGLOBE applies technical measures intended to detect suspicious to fraud traffic patterns and takes action when necessary.

Fraud Management System (FMS) internally developed, actively monitors the voice traffic managed from OTEGLOBE's network resources on a 24 x 7 x 365 basis. FMS triggers alerts, identifies source of suspicious traffic and where the necessary criteria met automatically blocks the source. At the Customer level, suspicious traffic patterns are analyzed and validated daily for abnormal surges in traffic volume by relevant personnel.

Controls of FMS are incorporated in a wide range of OTEGLOBE's traffic, including transiting traffic and of more direct relevance to FCC order on Robocalling, in traffic that has NANP telephone numbers as CLI and pertains to the USA to send voice traffic to residential or business subscribers in the USA. The traffic pattern control monitors include:

- NANP A-number and its serial subsequents that generate abnormal high volume of traffic calls / minutes to NANP B-number(s) in a limited timeframe.
- NANP A-number that generates high volume of one ring-calls to a wide range of NANP B-number(s) in a specific timeframe.
- Customized alarms to provide the level of vigilance requested like, high/low Answer Seizure Ration (ASR), high/low Average Call Duration, long call duration, for NANP origins (CLI) towards NANP destinations.

OTEGLOBE monitors metrics to detect behavior consistent with fraudulent traffic pattern to evaluate and improve existing controls and to develop Machine Learning models for fraud detection. OTEGLOBE will keep records of Customers that will send Robocall traffic and intends to apply blocks to mitigate fraudulent behaviors. Moreover OTEGLOBE will

proactively block calls having CLI +1 for termination to USA which will be sent from Wholesale Customers that do not have Retail traffic.

OTEGLOBE in its role as a transit carrier, acting always in compliance with the National and EU legal and regulatory framework within which lawfully operates, commits to cooperate with the Regulatory Authorities, law enforcement agents, and industry groups to investigate robocall traffic when requested, to respond to traceback requests permitted by applicable law and to mitigate illegal robocallers that use its network resources.

If, due to any:

- legal or regulatory reason deriving from National and EU mandatory regulations which shall have a precedence over any other contractual or other commitment OTEGLOBE has
- non-disclosure obligations deriving from specific agreements and not falling within the exemption of disclosure clauses
- records-deletion which has taken place after the minimum time of archiving as provided by National and EU regulations

OTEGLOBE is disallowed or not able to provide assistance within the framework agreed, it may have to confine its compliance with registration directives unless there is ruling or judgment by the authorities and/or courts the company is subject to.