

ROBOCALL MITIGATION PLAN

Ventatel Limited ("the Company") is an international intermediate provider that handles telecommunications traffic which passes through or is expected to pass through the public telephone network. The Company neither originates nor terminates such traffic.

Ventatel Limited has adopted the following key measures to prevent the transmission or processing of illegal robocall traffic:

- The Company conducts constant and proactive traffic monitoring to detect and prevent illegal calls. Ventatel Limited employs a sophisticated Fraud Management System ("FMS") to analyze incoming traffic in real-time. Utilizing advanced analytics and artificial intelligence, the system can identify various types of fraudulent activities, including but not limited to: Robocalls, Wangiri Fraud, PBX Hacking, International Revenue Share Fraud (IRSF), Artificially Generated Traffic, and Spam.
- The Company promptly and comprehensively addresses all traceback inquiries from the Federal Communications Commission (FCC), law enforcement bodies, and the industry traceback consortium. Ventatel Limited actively supports these entities in detecting and eliminating illegal robocalling activities.
- The Company employs mandatory Know Your Customer (KYC) procedure for onboarding new clients and collaborating with current ones. Ventatel Limited takes appropriate steps to determine the reliability of upstream providers to minimize the risk of illegal activity. These steps include confirming the customer's address, collecting and verifying contact details, and evaluating the customer's business operations to ensure regulatory compliance.
- Ventatel Limited allows traffic from customers utilizing NANP numbers tied to the United States in the caller ID field only if the customer has an active and valid entry in the Robocall Mitigation Database. Any de-listing from the database as part of an enforcement action results in suspension of service. The Company enforces strict contractual obligations requiring customers and vendors to assist in traceback investigations by identifying upstream providers responsible for suspected illegal traffic. Contracts explicitly forbid the misuse of Ventatel Limited's services for transmitting or processing unlawful traffic. Non-compliance with these terms may lead to contract termination.

Last review and update: February 20, 2026