



Robocall Mitigation Plan | Description

I. Objective and Scope

Bird¹ hereby submits this Robocall Mitigation Plan to the Federal Communications Commission ("FCC") pursuant to the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act.

This document describes:

- The reasonable steps Bird has undertaken to avoid originating illegal robocall traffic;
- Bird's commitment to ensure cooperation and prompt response to traceback requests from the FCC, law enforcement, and industry-standard groups; and
- Bird's commitment is to prevent illegal robocallers from using its services and to monitor incoming calls.

The following entities are subject to these robocall mitigation policies and procedures:

- Telvox Global B.V.
- Bird B.V.

The purpose of this plan is to define Bird's approach to significantly reduce the origination of illegal robocalls and prevent misuse of services that threaten the telecommunication industry.

II. Efforts to Avoid Illegal Robocalls

As robocalls and fraudulent calls constitute an ongoing threat to the telecommunication industry and our customers, Bird has assessed the associated risks and implemented several measures:

A. Customer Onboarding / Know Your Customer (KYC)

Bird employs a strict onboarding process requiring new customers to provide identifying information, including:

- Physical business location
- Contact person(s)
- Country of incorporation
- Tax identification number
- Other relevant information based on the requested services

New and renewing customers must affirmatively acknowledge and accept Bird's General Terms and Conditions. This process helps prevent services from being used for spoofed or illegal traffic and enhances our ability to detect and manage unacceptable traffic.

B. Contractual Terms and Suspension Capabilities

¹ For the avoidance of doubt, throughout this document, "Bird" refers collectively to the related entities within the Bird group as specified in Section I.

Bird's General Terms and Conditions and enterprise customer contracts include provisions that:

- Require service usage in compliance with applicable laws and regulations
- Prohibit unlawful use of numbers
- Mandate cooperation with law enforcement agencies and relevant authorities
- Enable Bird to immediately suspend services for customers originating illegal robocalls or otherwise using services unlawfully

C. Network Traffic Monitoring and Analysis

Bird employs experienced telecommunications personnel who monitor and analyze our network to identify and mitigate irregular traffic patterns and reduce fraudulent or illegal robocall traffic.

D. Investigation of Suspicious Calls and Patterns

When potentially fraudulent, abusive, or suspicious traffic patterns are identified, Bird promptly takes mitigation actions, including:

- Blocking or rejecting known fraudulent/abusive traffic or invalid calling numbers
- Blacklisting known abusive numbers
- Requiring customers to remediate and explain irregular traffic
- Implementing sanctions such as suspension or termination for violations

E. Complimentary Blacklisting and Call Blocking

Bird offers network-level call blocking and blacklisting at no cost to all customers.

III. STIR/SHAKEN Implementation

Bird's traffic enters the United States through intermediate operators listed in the FCC's Robocall Mitigation Database as having either deployed STIR/SHAKEN or implemented appropriate mitigation plans. Additionally, Bird has implemented its own STIR/SHAKEN solution to authenticate calls.

IV. Cooperation and Commitment to Responding to Traceback Requests

Bird is committed to responding within 24 hours to traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperating with such entities in investigating and stopping any illegal robocallers that use Bird's services to originate calls.