

Hablax, Inc.

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Robocall Mitigation Program – Updated 2026

Hablax, Inc. provides Mobile Top-Up Services, International Calls, and messaging services through its App. Our services include call traffic involving the United States. Approximately 99% of calls originate from outside the U.S., with limited support and customer service calls placed within the U.S.

I. Existing Preventive Measures

1. Telephone Number Registration Control

Calls made through our platform must originate from the registered telephone number associated with the user account. This prevents caller ID spoofing and reduces the likelihood of illegal robocalls.

2. Network Monitoring & Usage Verification Protocol

Our Security and Support Teams monitor excessive call volumes, suspicious patterns, and anomalous behaviors. Accounts are temporarily suspended pending investigation when suspicious activity is detected.

Automated Alerts Include:

- Alerts for high initial funding ($\geq$ \$20 USD).
- Alerts for excessive daily transactions.
- Alerts for excessive daily call volumes.
- Manual weekly transaction pattern reviews.

Mitigation Actions:

Accounts confirmed to be involved in illegal automated calls are permanently deactivated and added to a blacklist to prevent re-registration.

II. Know Your Customer (KYC) Program

Hablax applies a structured KYC framework including 2FA verification, IP/location validation, direct customer contact, document verification, and a monitoring classification system (Gray / Green risk tiers).

III. Measures Implemented (Former Future Steps Now Integrated)

1. Advanced Customer Fraud Scoring System – IMPLEMENTED

A multi-factor fraud scoring engine has been deployed. Customers are dynamically segmented based on behavioral analytics, IP geography, payment methods, transaction attempts, and pattern analysis.

2. Ongoing Staff Training Program – IMPLEMENTED

Continuous fraud detection training has been integrated into operations, covering emerging robocall patterns and social engineering tactics.

3. Customer Feedback & Reporting System – IMPLEMENTED

A structured in-app and support reporting channel allows users to report suspicious behavior, contributing to adaptive mitigation strategies.

IV. KYC Automation Enhancement (Phase-Based Development)

Phase 1 – COMPLETED

Automation of document collection workflows, preliminary validation checks, and risk-triggered identity verification.

Phase 2 – IN DEVELOPMENT

Expanded automation using enhanced behavioral analytics, automated document validation improvements, and real-time risk-based verification escalation protocols.

V. Additional Strategic Enhancements (2026 Roadmap)

1. Enhanced Traffic Analytics & AI Pattern Detection

Deployment of advanced anomaly detection models to identify abnormal call duration clusters, rapid sequential dialing, geographic inconsistencies, and high-risk traffic patterns.

2. Traffic Throttling & Dynamic Rate Limiting

Implementation of automated traffic throttling controls for accounts exhibiting suspicious call velocity patterns.

3. Periodic Internal Compliance Review

Annual review of mitigation controls, fraud metrics, and monitoring effectiveness to ensure continuous improvement and regulatory alignment.

Conclusion

Hablax maintains a proactive and evolving Robocall Mitigation Program. Our layered monitoring approach, risk scoring systems, KYC controls, automation enhancements, and strategic roadmap ensure continuous protection against illegal robocall traffic.