

Two Degrees Networks Limited

Robocall / SPAM Calls Mitigation Plan

To whom it may concern,

Two Degrees Networks Limited has undertaken the following measures to mitigate robocalls on its network:

a. Customer base: Two Degrees Networks Limited client base is primarily composed of retail subscribers, and we do not transit traffic for international carriers. Our terms and condition prohibit activities such as auto-dialling, continuously call forwarding, tele-marketing, call centres or other activities that uses our services for commercial gain and use of Cellular Trunking Units (including SIM boxes and GSM gateways).

b. Monitoring: Two Degrees Networks Limited monitors network traffic to assure the quality of service throughout the network including international traffic. A non-intrusive CDR based Fraud Management System is in place to alert on traffic case involving intermittent bursts of high activity, suspiciously low call completion rates/short call duration. In addition, our Fraud Prevention Department also monitors and alert on suspiciously high-volume traffic and patterns.

c. Investigation: Once suspicious traffic has been alerted, Two Degrees Networks Limited will collaborate with customers, carriers and providers expeditiously and in good faith to determine the legitimacy of the traffic. Two Degrees Networks Limited is also committed to respond in a timely manner to international voice calls providers for any trace back request.

d. Blocking and suspending: Once fraudulent traffic has been identified, Two Degrees Networks Limited will suspend and block immediately the customer/carrier originating the suspicious traffic.

e. Industry Forums: Two Degrees Networks Limited actively collaborates in industry and fraud forums to share information about fraud cases with our partners. This information sharing highlights repeat offenders who generate scam calls. Two Degrees Networks Limited is an active participants and signatories in the TCF Fraud, Revenue and Scam Phone Call Prevention working groups.

Two Degrees Networks Limited is constantly working on improving the tools that can help to prevent and detect any kind of fraudulent traffic and Two Degrees Networks Limited management will implement such measures and procedures without undue delays.