

MONACO TELECOM INTERNATIONAL SAM,
4/6 avenue Albert II, 98000 MONACO,
Identification number : 00 S 03851
Represented by :
M. Martin PERONNET, Chairman of the Board

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SUBJECT: MONACO TELECOM INTERNATIONAL ("MTI") ROBOCALL MITIGATION PLAN

Preamble

Monaco Telecom International is a company of the Principality of Monaco. It is not based in the United States and therefore it does not have the obligation to implement STIR/SHAKEN solution in its network.

Robocall Mitigation and Monitoring

MTI uses best efforts to monitor origination and intermediate traffic and investigates calling patterns that are indicative of caller ID spoofing or voluminous unwanted robocalling.

Compliance and Due diligence procedures

MTI has developed methodology in order to identify fraud and compliance risks related to third parties (suppliers, interconnect partners etc.) prior to the signature of any new contract with a carrier.

All MTI contracts (with customer and providers) include relevant provisions in order to prevent any unlawful usage of the service, and give the right to immediately block any voice traffic that could be understood as fraudulent.

Fraud management system

MTI Fraud management systems ("FMS") proactively monitors all traffic that goes in its network, identifying when certain predetermined thresholds are exceeded:

1. System sending alerts provided by the billing system (Captura-Oculeus) [type of alerts : ASR, Wangiri, sequential a number and b number, b number fails, call attempts..
2. In-House FMS based on an Intelligence Artificial (IA) analysis and which is currently being reinforced in term of process to be adapted to partners Group profiles.

Both systems analyse data once out of mediation

Moreover:

- a team in Monaco Telecom International is in charge of implementing additional manual checks during business day including several manual reports.
- MTI can and will take appropriate actions which may include termination of service against customers and interconnection partners that fail to remedy practices that result in the transmission of significant volumes of unwanted robocalls destined for the United States.

Martin PERONNET
Chairman of the Board

