



TOUS SOFTWARE CORP. ROBOCALL MITIGATION PLAN UPDATED - FEBRUARY 2026

PURPOSE AND SCOPE

This Robocall Mitigation Plan describes the policies and procedures Tous SoftWare Corp (“Tous”) uses to prevent, detect, and mitigate illegal robocall traffic consistent with 47 C.F.R. § 64.6305. The plan applies to voice traffic originated by Tous’s enterprise end-user customers and to call traffic Tous carries or processes on its network in the course of providing service.

PROVIDER ROLE

Tous offers Hosted PBX, SIP trunking, DID and Toll-Free services, and supports voice origination and termination for enterprise end-user customers. Outbound calls originate from end-user endpoints on Tous’s platform and are routed to the PSTN via upstream carrier partners, and inbound calls to numbering resources Tous manages are received from carrier partners and delivered to customer endpoints.

STIR/SHAKEN IMPLEMENTATION

Tous certifies that it has implemented STIR/SHAKEN caller ID authentication consistent with 47 C.F.R. § 64.6301(a). Tous’s voice network is entirely IP-based, and Tous authenticates and signs calls it originates using in-house signing with its own STI certificate, transmits authenticated caller ID information to the next provider in the call path, and verifies authenticated caller ID information on inbound SIP calls where technically feasible.

Tous assigns attestation levels based on its verification of the customer relationship and the calling party’s authority to use the associated telephone number(s), consistent with applicable FCC rules and guidance.

KNOW YOUR CUSTOMER PROCEDURES

Tous takes affirmative, effective measures to prevent new and renewing customers from using its network to originate illegal calls, including knowing its customers and exercising due diligence to ensure its services are not used to originate illegal traffic.

Before activating service, Tous validates each enterprise customer’s business identity and authority to contract for service. At onboarding, Tous verifies the customer’s corporate registration and status through the applicable U.S. Secretary/Department of State records and reviews available public records to confirm the entity is properly registered and active.

Tous also collects the customer’s expected use case and calling profile, including main business activity, estimated calls per day, and average call duration. Enhanced review is triggered when the enterprise cannot be verified as a U.S.-registered entity or when the contracting individual cannot be matched to the enterprise’s state registration, as well as when proposed usage indicates elevated risk such as unusually high volume or short-duration calling patterns.

Additionally, we maintain Terms of Service that prohibit illegal robocalls, spoofing/unauthorized caller ID, misuse of numbering resources, and other unlawful or abusive calling activity. Customer agreements

reserve our right to investigate, rate-limit, block, suspend, or terminate service for suspected or confirmed violations and to require supporting documentation when warranted.

TRAFFIC MONITORING, ANALYTICS, AND ENFORCEMENT

Tous monitors traffic patterns and call performance metrics using traffic reporting and usage statistics provided by its underlying carrier partner(s), including daily service-usage reports and related calling metrics used to identify anomalies such as unusual call bursts or short-duration calling patterns.

When suspicious or apparently unlawful traffic is detected, Tous blocks the affected traffic as appropriate, notifies the customer, and requires corrective action. If the issue is not promptly corrected or recurs, Tous terminates service.

KNOW YOUR UPSTREAM PROVIDERS

Tous does not accept traffic from any upstream provider, reseller, or partner that feeds the Provider traffic for onward routing. The Provider originates traffic only from its own enterprise end-user customers and receives inbound calls from its carrier partner(s) solely for delivery to the Provider's end users.

TRACEBACK COOPERATION AND PROGRAM MAINTENANCE

Tous remains committed to responding fully and within 24 hours to call traceback requests from the Commission, law enforcement, and the traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers initiating calls.

Tous has not been prohibited from filing a certification in the Robocall Mitigation Database.

Tous reviews and maintains its robocall mitigation program and updates it within 10 business days when filing information, services, traffic patterns, or risk controls change.