

ROBOCALL MITIGATION PLAN

This Robocall Mitigation Plan is established by TRIUMPH, a multinational business process outsourcing (BPO) provider based in Mexico and South Africa, pursuant to demonstrating its commitment to preventing illegal robocalls while providing call center and customer engagement services to clients by leveraging Voice over Internet Protocol (VoIP) platforms and services based in the United States. This document outlines the policies, procedures, and measures implemented by TRIUMPH to mitigate the risk of illegal robocalls originating from its operations pursuant with alignment with STIR/SHAKEN.

I. POLICY STATEMENT

TRIUMPH maintains a zero-tolerance policy towards illegal robocall activities and acknowledges the importance of industry standards, regulatory compliance, and robust mitigation practices in combating such activities.

II. CONTEXT AND STATEMENT OF APPLICABILITY (SOA)

As a BPO, TRIUMPH does not operate its own telecommunications network or provide direct voice services. Instead, it utilizes the VoIP capabilities and cloud platforms of US-based providers such as, but not limited to Five9, PhoneBurner, Twilio (all of these publicly known to be STIR/SHAKEN compliant) and others, ever-changing as required and informed by our clients, to deliver call center services on their behalf.

TRIUMPH is aware of the potential exemption process outlined in 47 CFR § 64.6306, which allows voice service providers to seek exemption from certain STIR/SHAKEN implementation requirements by certifying their adoption, participation, and implementation progress or plans for an effective caller ID authentication framework.

While TRIUMPH **does not have direct control** over the STIR/SHAKEN implementation status of these third-party cloud platform providers, it acknowledges the importance of **engaging with clients who make use of** robust caller ID authentication practices and solutions aligned with FCC guidelines.

Regardless of any potential exemption pathways, TRIUMPH remains committed to ensuring its clients leverage VoIP platform providers that are fully compliant with STIR/SHAKEN implementation requirements across their networks and services, as mandated by the FCC.

III. REGULATORY COMPLIANCE

TRIUMPH is committed to complying with all applicable regulations and industry standards regarding robocalls, including but not limited to:

- Telephone Consumer Protection Act (TCPA) in the United States
- FCC rules and guidelines related to robocall mitigation and STIR/SHAKEN implementation

TRIUMPH will continuously monitor and adapt its practices to adhere to any evolving regulations, guidelines, or industry standards in the jurisdictions where it operates and provides services.

IV. ROBOCALL MITIGATION PLAN

Phases	Description	How is this addressed?
Customer Due Diligence	1. Thorough vetting of potential clients to assess legitimacy and robocall compliance by ensuring their VoIP solution is STIR/SHAKEN compliant.	TRIUMPH onboarding process includes steps to ensure information detailing VoIP solutions are in alignment with STIR/SHAKEN. (1, 2.)
	2. Collection of comprehensive business information, including location, type of business, call nature, expected call volume and an understating of target consumers.	
	3. Contractual agreements prohibiting the use of TRIUMPH's services for illegal robocalling activities, with provisions for suspension or termination of services in case of violations.	Signatures outlying responsibilities for dialing solutions are kept in record as evidence (3).
Internal Policies and Procedures	1. Comprehensive employee training on identifying and avoiding behaviors and misuse of systems outside of the scope of BPO tasks.	Through employee training as detailed in client onboarding and procedure documents which include escalation steps and compliance reporting (1, 2).
	2. Establishment and communication of clear internal procedures for handling suspicious call activity, including reporting mechanisms and escalation protocols as per our clients' specifications.	
	3. Maintenance of detailed call logs, including caller ID information, call duration, and call recipient information, for auditing and investigation purposes. This is leveraged from our client's systems.	Through quality assurance monitoring, which can be done by the client, TRIUMPH or both parties (3).
Monitoring and Analysis	1. Continuous monitoring of network usage and analysis of call detail records to detect anomalies and suspicious calling patterns.	
	2. Identification of potential indicators of illegal robocalling, such as unusual call volumes, short-duration calls, sequential dialing patterns, and calls to invalid or unassigned numbers.	
	3. Prompt investigation of identified anomalies and potential suspension or termination of non-compliant client campaigns.	Through quality assurance monitoring, which can be done by the client, TRIUMPH or both parties (3).
Third-Party Platform Compliance	1. Leveraging the robocall mitigation features and capabilities offered by the VoIP platform providers utilized by TRIUMPH in accordance with our client's memos.	
	2. Staying informed about the platform providers' robocall mitigation practices, updates, and enhancements	This is a topic on business review meetings with clients where applicable, TRIUMPH takes the role of the recipient of changes in policies, procedures or migrations because of strategic decisions from our clients.

V. STIR/SHAKEN CONSIDERATIONS

While TRIUMPH recognizes the significance of the STIR/SHAKEN caller ID authentication framework in mitigating robocall threats, its current reliance on third-party VoIP platforms may limit its ability to directly implement STIR/SHAKEN across its own network infrastructure. However, TRIUMPH demonstrates good faith alignment with the spirit of STIR/SHAKEN through the following measures:

Action item	Detail	Evidence
A) Customer Due Diligence	Ensuring clients provision numbers and services from providers with robust caller ID authentication, know-your-customer practices, and illegal robocall monitoring capabilities aligned with FCC requirements and guidelines.	- Emails - Data sheets - Policies and procedures - Escalation procedures with VoIP cloud service where applicable.
B) Contractual Obligations	Including compliance obligations in its contracts with VoIP platform vendors regarding robocall mitigation, traceback cooperation, client vetting, and other preventative measures.	- Signed contract addendums
C) Ongoing Monitoring	Continuously monitoring industry developments and advancements in STIR/SHAKEN implementation for cloud-based and outsourced call center solutions.	- Email communication between legal-Sr. Management and compliance teams.

If TRIUMPH's network configuration changes or regulations evolve to mandate STIR/SHAKEN compliance for its specific operations, TRIUMPH will adapt its plan and procedures accordingly to support and achieve full STIR/SHAKEN implementation.

VI. TRACEBACK COOPERATION AND ASSISTANCE

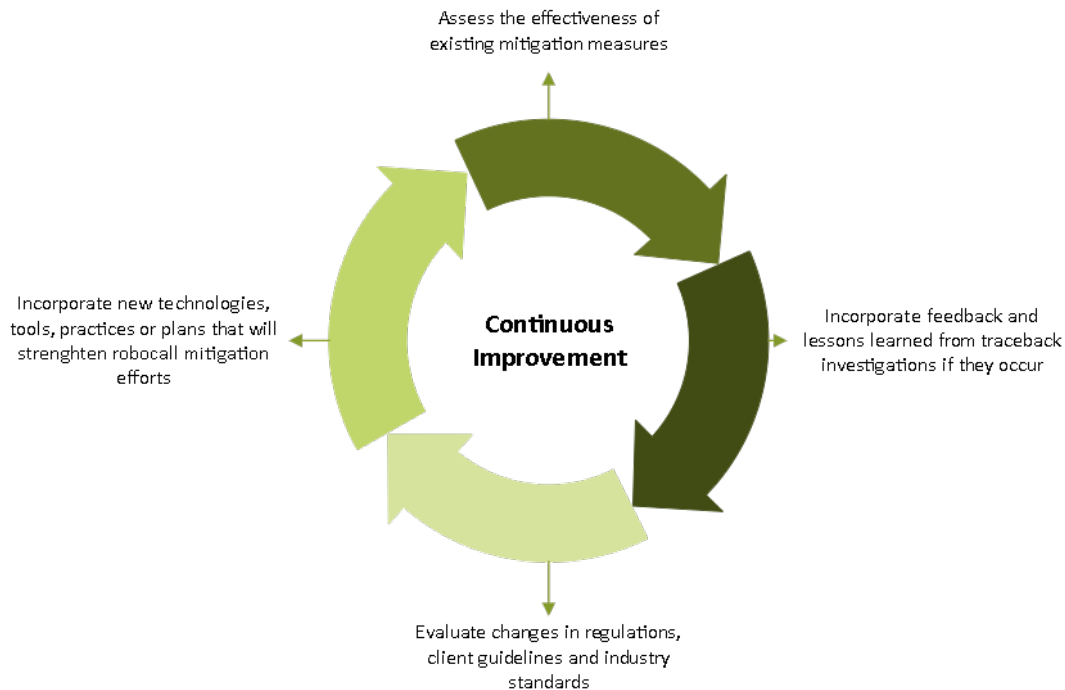
TRIUMPH is committed to fully cooperating with regulatory authorities, law enforcement agencies, and industry traceback groups regarding any suspected illegal robocall incidents related to its service delivery. Upon receiving a traceback request, TRIUMPH and its clients commit (as per contractual agreements) to promptly investigate and provide a comprehensive response, including but not limited to:

Traceback report	Source
Details on the client campaign in question	Client's dialer system
Identification of the third-party VoIP platform used	Client's dialer system
Relevant call records and logs	Client's dialer system
Any additional information necessary to support traceback efforts effectively	Join effort, may include TRIUMPH employee records and information system credentials among others + Client's dialer system data.

TRIUMPH will dedicate sufficient resources to ensure timely and comprehensive responses to all traceback requests received in the understanding that the calling platform may be mostly, if not fully managed by its clients.

VII. CONTINUOUS IMPROVEMENT AND PLAN REVIEW

TRIUMPH acknowledges the dynamic nature of the robocall mitigation landscape and the need for continuous improvement. As such, TRIUMPH will periodically review and update this Robocall Mitigation Plan, at least annually, to ensure it remains effective and aligned with the latest regulations, industry best practices, and technological advancements in robocall mitigation.



Through this continuous improvement cycle, TRIUMPH aims to maintain a robust and up to date Robocall Mitigation Plan that effectively addresses the evolving robocall threat landscape.

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