

Robocall Mitigation Plan Sakari, Inc.

Introduction

This document details the reasonable steps and actions taken by Sakari, Inc. ("Sakari") to mitigate and eliminate illegal robocalling. Sakari has an ongoing commitment to scan for and help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and working with other providers and regulatory agencies in combating fraudulent voice activity.

Sakari provides interconnected Voice over Internet Protocol ("VoIP") calling services. All telecom services are provided on a resale-only basis. As a telecom reseller, Sakari is dependent on our underlying provider's assistance with monitoring their networks for fraudulent voice calling patterns.

Know Your Underlying Provider

Sakari Inc. has master service agreements with our upstream providers and has received written assurances from their officials that it has and will continue to sign calls submitted to Sakari Inc. and will abide by the FCC's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to Sakari. Sakari and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Customer Acceptance Policy

At the outset of initiating Sakari services, all customers must agree to Sakari's Terms of Service, which are designed to combat robocall and spam text messages before service is deployed.

Customers agree that they are responsible for all communications transmitted via their account and Sakari reserves the right to terminate any and all services if Sakari believes, in its sole discretion, that the customer has breached any obligation of the Terms of Service.

The Terms of Service expressly forbid the customer and require the customer to expressly agree that they shall not use Sakari's services in a manner that would violate any applicable laws, rules or regulations, including those laws, rules or regulations governing telemarketing, unsolicited calls, and limitations on the use of automated or prerecorded calling technology, including the Telephone Consumer Protection Act, the Federal Trade Commission's Telemarketing Sales Rule, and applicable state laws. Sakari also reserves the right to impose limits on any customers' usage of its services or to terminate its services if Sakari believes, in its sole reasonable discretion, that such usage, including the total number of calls made and/or minutes used by a customer is not consistent with normal, fair, and reasonable use of Sakari's services.

Know Your Customer

Sakari has established and implemented a comprehensive Know Your Customer (“KYC”) policy for all customers. The objective of the KYC policy is to prevent Sakari services from being used, intentionally or unintentionally, for spoofed or illegal traffic.

As part of Sakari’s KYC procedures, all customers are reviewed to have: a working website, terms of service on their website, a business address; a valid payment method, and, optionally, a LinkedIn page. Customers are also required to provide further proof of identity and address to validate a Sakari number, where applicable by law.

Traceback Requests

Sakari is committed and will respond fully within 24 hours to all Traceback Requests from the FCC, law enforcement agencies, and the industry traceback consortium and vows to cooperate with these agencies in investigating and stopping any illegal robocallers that use our service to make calls.

Carriers and service providers are encouraged to send any request for fraud investigation or tracebacks to the Sakari team at: abuse@sakari.io

Once such a request has been received, the Sakari team will open an internal case and gather information associated to the number, including the customer or company name, address, and any information about the business and telephony usage. Simultaneously, our support team will contact the customer to get more input about the situation.

Sakari will relay all relevant information back to the carrier or service provider. In the case of proven fraud (or even spam or scam calls), Sakari will immediately block the number originating the calls or text and, depending on the findings about the customer, also block the whole customer and terminate its account. In some situations, when Sakari suspects it has identified unlawful calling, in addition to taking the steps identified above, it also may contact the party sending Sakari the calls (i.e., Sakari’s carrier/provider customer), and request that they work to investigate their customers (e.g., to identify the party sending them the calls,

Calling Analytics

As a reseller, Sakari must rely on our underlying provider and/or their third-party vendors to determine if originating calls should be blocked based on call analytics practices.

Ongoing Robocall Mitigation

Sakari monitors and examines call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. When we and/or our underlying provider detect network usage patterns consistent with illegal robocalls or suspect illegal robocalling is taking place, we will immediately seek to identify the party that is originating, terminating, or routing these calls so that we may take appropriate action. The actions taken may include, but are not limited to initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a

receiving party matches the customer's corporate and/or d/b/a name; block the party's ability to originate, terminate, or route calls on the network; and/or providing notice to law enforcement authorities.

As part of our plan to mitigate and prevent any originating robocalls, we are committed to early identification and investigation of possible robocalling conditions. Among other things, we watch for higher-than-normal subscriber traffic volume, including large bursts of traffic in small timeframes or spikes in usage. We also monitor for originating calls of short duration and low call completion percentages, originating calls with sequential called to number dialing patterns.

Plan Update Process

This Robocall Mitigation Plan describes the specific measures that Sakari has implemented as of April 16th, 2024. The Company will update our Robocall Mitigation Plan filings within 10 business days of any change to the information outlined in this plan.