

FCC Robocall Mitigation Plan

This document outlines the specific reasonable steps taken by China Mobile Hong Kong Company Limited ("CMHK") to avoid originating illegal robocall traffic. CMHK will update this plan within ten (10) business days following the date of any changes.

CMHK's Role in the Call Chain

CMHK is a licensed telecommunications operator that provides mobile voice and data services to end users in Hong Kong. CMHK's customers are able to use its voice services to originate voice calls destined for end users located in Hong Kong, the United States and other international jurisdictions.

CMHK does not assign any North American Numbering Plan ("NANP") resources to its customers. All telephone numbers assigned by CMHK to its customers are allocated pursuant to the numbering plan promulgated by the Office of the Communications Authority ("OFCA") of Hong Kong. The only circumstance in which calls using NANP resources pertaining to the United States may originate on CMHK's network is when a customer of a U.S. mobile operator is roaming on CMHK's network in Hong Kong. Such roaming is governed by executed international roaming agreements between CMHK and its U.S. carrier partners.

STIR/SHAKEN Implementation Obligation and Status

CMHK is a foreign voice service provider without a STIR/SHAKEN implementation obligation. CMHK does not provide any services in the United States and exclusively serves customers located outside of the United States. All traffic originated by CMHK is originated outside of the United States using non-U.S.-based facilities. Accordingly, CMHK is currently incapable of obtaining a Service Provider Code ("SPC") token due to Governance Authority policy and is exempt from an obligation to implement STIR/SHAKEN pursuant to 47 C.F.R. § 64.6304(b).

Know-Your-Customer Policies for New and Renewing Customers

CMHK strictly adheres to "Know Your Customer" ("KYC") registration policies mandated by the OFCA in Hong Kong. All customers must complete an official identity verification process to obtain a telephone number from CMHK. The customer identity verification process requires obtaining original identity documents, name, date of birth, and identification number before service activation. For business customers, CMHK obtains the business or branch registration certificate number, customer name, and the personal information of the person responsible for the business customer's service. For pre-paid services, the SIM card cannot be used until the customer verification process has been completed.

CMHK also conducts periodic re-verification of registered information for CMHK customers. Failure of customers to comply with re-verification instructions can result in deactivation of the customer account.

Terms of Service/Contractual Policies to Limit Robocalls

CMHK maintains contractual relationships with its customers. Pursuant to CMHK's contracts and general terms and conditions of service, customers are required to comply with all relevant laws and regulations, policies, and requirements from regulatory and administrative agencies. This includes restrictions on the use of CMHK's service for any actions which are illegal, improper, obscene, indecent, or fraudulent.

CMHK retains the right to temporarily limit or suspend any or all of CMHK's services to a customer in order to reduce or prevent improper use of CMHK's network or resources, deceptive or fraudulent acts or interference until the customer has ceased such activity or the relevant investigation has been completed. CMHK also retains the right to terminate service to customers who are found to provide false information to CMHK in connection with the service (including during the customer identity verification process). Customers who have previously been flagged for fraudulent activity or other violations of CMHK's terms of service can be prohibited from activating any new service offered by CMHK.

"Know Your Upstream" Provider Policies

CMHK takes steps to conduct due diligence to vet upstream providers from which CMHK receives voice traffic, and to which CMHK transmits voice traffic. CMHK maintains agreements with a limited number of interconnecting providers, which remain subject to review and revision from time to time in order to comply with applicable regulatory requirements. Calls originating on CMHK's network are transmitted through a limited number of intermediate operators with whom CMHK has a direct contractual relationship, and which are listed in the FCC's Robocall Mitigation Database ("RMD").

Identification and Monitoring of Robocalls

CMHK has established an independent real-time network monitoring system that analyzes call behavior patterns to automatically flag abnormal high-frequency or non-compliant calls. CMHK's Network Operations Center ("NOC") provides 24/7 proactive monitoring and issues real-time alerts for suspicious high traffic and anomalous patterns.

(1) Identification and Blocking of Robocalls

- a. CMHK has built a multi-layered protection system to provide real-time warnings and automatically block identified robocalls. CMHK regularly updates its fraud pattern database and dynamically adjusts blocking strategies to address evolving risks. We have launched AI-driven robocall pattern recognition and blocking capabilities and rely on a multi-dimensional monitoring model to implement tiered handling and rapid response.
- b. CMHK receives a list of suspected scam telephone numbers on a daily basis and acts promptly to block these identified numbers. This proactive action effectively protects customers from falling victim to telecommunications-facilitated fraud.

(2) Anti-Fraud Innovation

- a. CMHK has independently developed a proprietary anti-fraud model for the identification of scam calls. CMHK primarily utilizes a suite of in-house developed and open-source tools for network traffic analysis and monitoring. These internally managed tools include, for example, FineBI, Hadoop, TM Forum ODA Framework, Cacti, and Wireshark.
- b. Furthermore, CMHK has independently created an anti-fraud AI agent that can be deployed to combat illegal activities such as those involving pseudo base stations.
- c. Consistent with applicable legal requirements and restrictions, CMHK

maintains call detail records for a standard retention period of six (6) months.

Traceback Commitments

CMHK prioritizes communication security and user rights and is committed to providing users with a safe and reliable communication environment. CMHK commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocalls that use CMHK's service to originate, carry, or process illegal robocall.

History of Enforcements and Investigations

Except as described below, CMHK has not been subject to any formal FCC, law enforcement, or regulatory actions or investigations with accompanying findings of actual or suspected wrongdoing due to CMHK transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient RMD certification or mitigation program description.

On December 8, 2025, the FCC's Enforcement Bureau issued an Order (DA-1020) directing CMHK to cure deficiencies in its RMD certification because CMHK failed to update its certification and robocall mitigation plan with the information required by changes in regulations that took effect on February 26, 2024. Following CMHK's initial registration in the RMD on September 24, 2021, the employee responsible for CMHK's RMD certification departed. At the time of their departure, the former employee did not provide CMHK with the credentials required to update CMHK's RMD certification, nor did the former employee update CMHK's contact information in the RMD to reflect their departure. As a result, CMHK did not have access to the credentials required to access the RMD and did not timely update its RMD certification or plan. CMHK undertook immediate action to correct its RMD certification upon receipt of the Enforcement Bureau's Order (DA-1020). As of December 22, 2025, CMHK has not been removed from or prohibited from filing in the RMD.

Ownership and Management

CMHK is a direct, wholly owned subsidiary of Fit Best Limited, which is a direct, wholly owned subsidiary of China Mobile Limited. Seventy percent of China Mobile Limited is owned by China Mobile Hong Kong (BVI), which, through its parent entity, is wholly owned by China Mobile Communications Corporation.

CMHK has one subsidiary, HKBN Ltd. Through common ownership by China Mobile Limited, CMHK is affiliated with the following entities:

- China Mobile International Limited
- China Mobile International (USA) Inc.

The principals, directors, and key management of CMHK are:

Name	Title
Mr. Ling Hao	Chairman
Ms. Shi Xiaoping	Chief Executive Officer
Mr. Lei Liquan	Director
Mr. Wang Dayue	Director
Mr. Li Xin	Director
Mr. Luo Weimin	Director

Mr. Bian Yannan	Director
Mr. Nie Yutian	Director