

## Robocall Mitigation Plan

TruEnergy is an energy brokerage. Our phone system is used by our employees during the course of business from our phone servers.

Plan specifics:

### 1. Gated access

TruEnergy does not directly interface with any telephony infrastructure.

TruEnergy utilizes third party service providers who offer VoIP termination and origination. Those third-party providers have their own mitigation plans and/or STIR/SHAKEN implementations. TruEnergy cannot create an outbound call that circumvents the service providers mitigation plans. All calls made by TruEnergy go through our IP whitelisted phone servers.

### 2. Prevention

TruEnergy has made reasonable effort to secure access to the software and hardware functionality that creates outbound calls via third party service providers. These efforts include controlled employee access, utilization of secret tokens provided by service providers, login credential verification on any phone connecting to our servers, and IP registration of our phone servers. Only a few limited access supervisor phones have the ability to call a number not in our phone number whitelists.

### 3. Detection

Outbound calls are logged and accessible from searchable internal reporting.

### 4. Remediation

Outbound call functionality can be restricted per user. User accounts can be disabled. IP addresses can be blocked.