

VOLO, LLC STIR/SHAKEN ROBOCALL MITIGATION

VOLO's system is used by our clients for critical business communications. Clients load employee contact data into the system and can launch voice, SMS and email communications to its database of records targeting specific groups using geographic or other filtering points. Communications can only be launched from our user interface by system users with valid login credentials.

Only VOLO clients who have signed a Services Agreement may originate any traffic on VOLO's network. All clients undergo vetting that includes:

- Verifying correct legal name via articles of incorporation in state where the company is organized.
- Verifying legal address with secretary of state in state where the company is organized.
- Verifying line of business (website, marketing materials, etc.) to ensure it falls in line with VOLO's allowed use cases.

VOLO takes numerous steps to ensure that no illegal calls are originated through our system. For example, all contracts include the following clause:

5. RESPONSIBILITIES OF CLIENT: CLIENT shall be solely responsible and liable for the content of any message(s) disseminated via the VOLO OS system or over the VOLO network. The VOLO OS system is designed and offered for internal staff notification and communication only. The parties agree that the VOLO system cannot be utilized by CLIENT for prohibited Telemarketing or other types of solicitation communications. CLIENT represents and warrants that it has authority to utilize the database of records, including list(s) of names, telephone numbers and e-mail addresses used in association with the VOLO Service.

Other measures taken to limit illegal Robocalls from being launched:

- Each user has a unique user ID and complex password
- Each user has to be assigned a role with very specific privileges – not all system users can launch communications
- All system actions are logged, enabling us to determine who entered data or launched a communication.
- VOLO maintains a database on all communications launched and the results of those communications, giving us an audit trail to assist with any investigations.

VOLO does not utilize any third-party analytics vendors or analytics systems as no externally-originated communications can be fulfilled by our messaging system. Only communications originated from our internal IP addresses are allowed to send any voice traffic over our network.

VOLO is not a carrier and does not sign voice traffic originated from our network. VOLO has long-term relationships with our voice providers and we work with them to ensure all calls originated by our clients are properly signed with the correct attestation level.

VOLO, LLC is committed to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers.