

ServiceTitan, Inc. — Robocall Mitigation Plan

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This robocall mitigation program describes the "reasonable steps" ServiceTitan takes to avoid, as applicable, the origination, carrying, or processing of illegal robocall traffic as well as the affirmative, effective measures it takes to prevent new and renewing customers from using its network to originate illegal calls.

1. Know Your Customer

ServiceTitan is a cloud-based platform serving the trades industry (HVAC, plumbing, electrical, and other home and commercial service companies). ServiceTitan provides voice services to its customers ("tenants") through enterprise sales agreements — tenants are known businesses with ongoing contractual relationships, not anonymous or self-serve accounts.

ServiceTitan vets customers at each stage of the service relationship: (i) when approving an application for service, (ii) when provisioning network connectivity, (iii) when entering into a contract agreement, and (iv) when granting the right to use telephone number resources. The subsections below describe the controls at each checkpoint.

1.1 Tenant Identity Verification (Checkpoints i and ii)

ServiceTitan verifies tenant identity at multiple points:

At platform onboarding (Checkpoint i):

ServiceTitan acquires customers through an enterprise sales process. Before a tenant is provisioned, the following information is collected and verified through the sales and onboarding workflow:

- Business identity: Company name, business address, and primary contact person(s) are collected as part of the sales agreement and platform registration.
- Business legitimacy: ServiceTitan serves a defined set of trades (HVAC, plumbing, electrical, and related home and commercial services). The nature of the customer's business is established during the sales process and must align with ServiceTitan's served verticals.

- Payment verification: A valid payment method is required before tenant provisioning. The billing relationship provides an additional layer of identity confirmation.
- Authorized contacts: The tenant's authorized administrator and onboarding point of contact are identified and registered in the platform.

At voice service provisioning (Checkpoint ii):

Voice services are enabled through a dedicated telecom onboarding process that includes a discovery call, number porting coordination with the gaining carrier, call routing configuration, and go-live training. Because voice services are provisioned within the context of an existing, verified tenant relationship, the identity controls established at platform onboarding carry through to voice enablement.

1.2 Phone Number Provisioning and Caller ID Verification (Checkpoint iv)

ST-Provisioned Numbers: When ServiceTitan provisions phone numbers for a tenant, ownership is inherent — ServiceTitan acquires the number from its carrier and assigns it directly to the tenant's account. No additional verification is required.

1.3 Contractual Provisions (Checkpoint iii)

ServiceTitan's Terms of Use (TOU) require customers to comply with all applicable laws governing telephone calls, including the Telephone Consumer Protection Act (TCPA) and the telemarketing provisions of the Canadian Competition Act and Canada's Anti-Spam Legislation (CASL). Customers must ensure that all voice calls sent using the ServiceTitan platform are sent with recipients' valid consent and include prescribed information and an effective unsubscribe mechanism, to the extent required.

The TCPA prohibits autodialed or prerecorded calls to wireless numbers without prior express consent and requires prior express written consent for telemarketing. The contractual requirement to comply with the TCPA operates as a restriction on illegal robocalling through the ServiceTitan platform.

The TOU grants ServiceTitan the right to suspend or terminate service if a customer breaches these restrictions.

2. Know Your Upstream Provider

ServiceTitan's voice services utilize a limited number of vetted upstream voice service providers for call origination, termination, and platform services.

Upstream Provider Due Diligence

ServiceTitan performs due diligence on upstream providers:

- Identity and compliance posture: Each upstream provider is a well-established, publicly known voice service provider. ServiceTitan has verified the identity, physical business location, and nature of business for each provider through the contracting process.
- Contractual provisions: ServiceTitan maintains contractual agreements with each upstream provider that include provisions for service quality, compliance with applicable law, and termination rights.
- Information security review: ServiceTitan's vendor onboarding process includes an information security assessment for providers that handle customer data, conducted through the company's compliance review pipeline.

3. Network Monitoring and Reasonable Steps

3.1 Call Monitoring Infrastructure

ServiceTitan monitors call traffic for behaviors consistent with illegal robocalling, including anomalous call volume patterns, unusual call completion rates, and error rate spikes. When suspicious activity is detected, the RTC Operations team investigates and takes appropriate action, which may include contacting the tenant, suspending voice services, or terminating the account.

In addition to monitoring active traffic, ServiceTitan's onboarding and provisioning processes (described in section 1) function as preventive controls against new and renewing customers using the platform to originate illegal calls. Enterprise sales agreements, identity verification, and Caller ID validation at provisioning collectively ensure that voice services are only enabled for verified businesses with legitimate use cases.

ServiceTitan maintains automated alerting on platform-wide call volume patterns, including anomalous increases and decreases in inbound and outbound call volume, call failure rate spikes, and carrier route health degradation. Alerts are routed to the RTC Operations team via dedicated monitoring channels for investigation and response.

ServiceTitan does not use a third-party call analytics vendor for robocall detection. Call monitoring is performed through internal systems (Kamailio, Datadog, ELK/Kibana) and carrier-provided reporting.

ServiceTitan routinely evaluates the efficacy of its monitoring and makes improvements as indicated.

4. Complaint Handling and Enforcement

When ServiceTitan receives a complaint regarding suspected illegal robocall activity originating from its platform — via customer support tickets, carrier notifications, FCC notices, or traceback requests — ServiceTitan investigates by reviewing call detail records, tenant account information, and that traffic.

If the investigation confirms illegal robocall activity, ServiceTitan takes enforcement action under the TOU:

1. Warning: Tenant is notified of the violation and required to cease the activity immediately.
2. Suspension: If activity continues or is egregious, ServiceTitan suspends the tenant's voice services pending resolution.
3. Termination: Persistent or willful violations result in termination of the tenant's voice services and, if warranted, the entire platform subscription.

ServiceTitan cooperates with law enforcement as required when investigations reveal potential violations of federal law. ServiceTitan commits to respond 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 any illegal robocallers that use its service to originate calls.

5. Parents, Subsidiaries, Affiliates, and Principals

Parent Company: None — ServiceTitan, Inc. is the top-level entity (Delaware corporation, NASDAQ-listed)

Subsidiaries: ServiceTitan Arevelk LLC (Armenia); ServiceTitan Software Canada ULC (Canada); Aspire; FieldRoutes; ServicePro; Convex; Conduit Tech LLC

Affiliates: None

Principals: Ara Mahdessian, Co-Founder and Chief Executive Officer; Vahe Kuzoyan, Co-Founder and President; Dave Sherry, Chief Financial Officer; Michele O'Connor, Chief Accounting Officer