

How we run our business

LETTER FROM

JOS VAN LOO



“AT SOUND OF DATA, **EVERYONE** USES THEIR **POWER** TO POSITIVELY INFLUENCE THE **QUALITY** OF OUR **PRODUCTS** AND **SERVICES**. WE **DEDICATE** TIME AND **EFFORT** PROTECTING OUR CLIENTS’ **INFORMATION**, THEIR **CUSTOMERS’** INFORMATION AND OUR **EMPLOYEES’** INFORMATION.”

Sound of Data's governance program is of great importance. It ensures commitment to values and ethical conduct of business, transparency and compliance. It confirms that we are governed in the best interest of all stakeholders and guide our actions to deliver products and services that are secure, compliant and fully integrated in Sound of Data's preferred way of working. We are involved in, and dedicated to, achieving the highest standards for our products and services, and providing and delivering the best customer service through the application of our Integrated Management System (IMS) for Quality, Information Security and Data Protection. This integrated management system is implemented throughout our entire organization and verified by third-party certification bodies and in line with the:

- International Standard for Information Security, ISO/IEC 27001:2013
- International Standard for Quality, ISO 9001:2015
- Technical Standard related to personal

data protection in compliance with the regulation (EU) 2016/679

Our Integrated Management System (IMS) serves to formalize the policies, processes and operating standards that will apply to Sound of Data employees (including temporary staff and contractors), partners and suppliers. We encourage all employees and other stakeholders in our organization to ensure that they play their part in, and comply with, delivering our objectives.

Teamwork, engagement, ownership and support by everyone in the organization are crucial to achieve our objectives. In this context, we are committed to providing the required leadership, management, governance and resources to ensure that the Integrated Management System is improved continuously and actively communicated to all employees. It is part of our culture.

PROUD TO BE

CERTIFIED



This certificate relates to the information security management system and not to the products or services of the certified organization. The certificate reference number, the mark of the Certification Body and/or the accreditation mark shall not be shown on products or stated in documents regarding products or services. Information material, advertisements or other documents showing or referring to the certificate, the trade mark of the Certification Body, or the accreditation mark, must comply with the intention of the certificate. The certificate does not of itself confer immunity on the certified. The use of the UKAS Accreditation Mark indicates accreditation in respect of those activities covered by the accreditation certificate number 015 held by NQA. NQA is a trading name of NQA Certification Limited. Registration No. 00051738. Registered Office: Warwick House, Houghton Hall Park, Houghton Regis, Dunstable Bedfordshire LU5 2XX, United Kingdom. This certificate is the property of NQA and must be returned on request.



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QUALITY

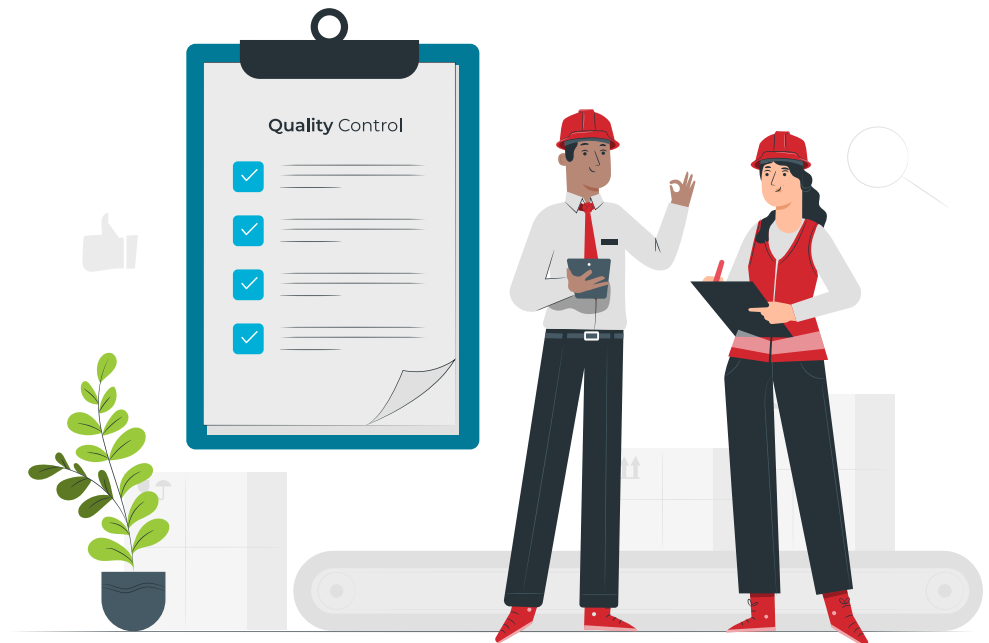
COMMITMENT OF MANAGEMENT

To deliver voice consultancy services, project and operational support on routing solutions, call analytics and user experience design for our clients it is essential that we provide a product and service which fulfills the needs and expectations of our clients and their customers preventing process loss or quality impact. Therefore, quality and compliance are of paramount importance to our organization. We are committed to uphold the highest possible standards for our products and services, the best customer services, and always operating in accordance with applicable laws and regulations.

MEETING OUR COMMITMENTS

At Sound of Data, we recognize that the maintenance of quality in all activities is the key to our success and reputation.. To achieve our commitment;

- We engage our clients to understand their needs and requirements whilst being transparent to ensure that any issue is communicated and resolved as quickly and effectively as possible;
- We identify innovation in our field of expertise, set targets to promote continuous improvement and provide the necessary resources to achieve them;
- We learn from experiences gained, be it by ourselves, our clients or our suppliers, adopting best practices, working closely with our suppliers to stay ahead of the competition and always be aware of the market developments, emerging technologies and proven solutions.
- And, we provide an environment which is diverse and inclusive, where employees feel safe, are free to pursue their ambitions, and develop themselves by learning new competences and skills.



CYBER AND INFORMATION SECURITY

COMMITMENT OF MANAGEMENT

To deliver voice consultancy services, project and operational support on routing solutions, call analytics and user experience design for our clients it is essential that we at times process data and information entrusted to us by our clients and their customers. Therefore, professional and adequate cyber and information security is of paramount importance to our organization. We are committed to guarantee the confidentiality, integrity and availability of all data and information in our possession, always operating in accordance with applicable laws and regulations.

MEETING OUR COMMITMENTS

At Sound of Data, we believe that the responsible use of data and information supports business growth and strong relationships between brands and consumers. To achieve our commitment:

- We ensure that the confidentiality, integrity and availability requirements are met to prevent unlawful or unauthorized use and access or accidental loss of data and information;
- We process data information in a fair, lawful and transparent way. Where appropriate, we will enforce the highest data classification levels to meet confidentiality and sensitivity requirements;
- We recognize that we are responsible for data and information under our control, and have designated individuals responsible for compliance with these principles and all applicable cyber and information security laws and regulations;
- And, we only process data and information as permitted by laws and regulations, and within the limits set out in our security policies, notices, or contracts with clients and suppliers. In that regard we will only process data and information in line with relevant instructions from either our clients or suppliers.



DATA PROTECTION

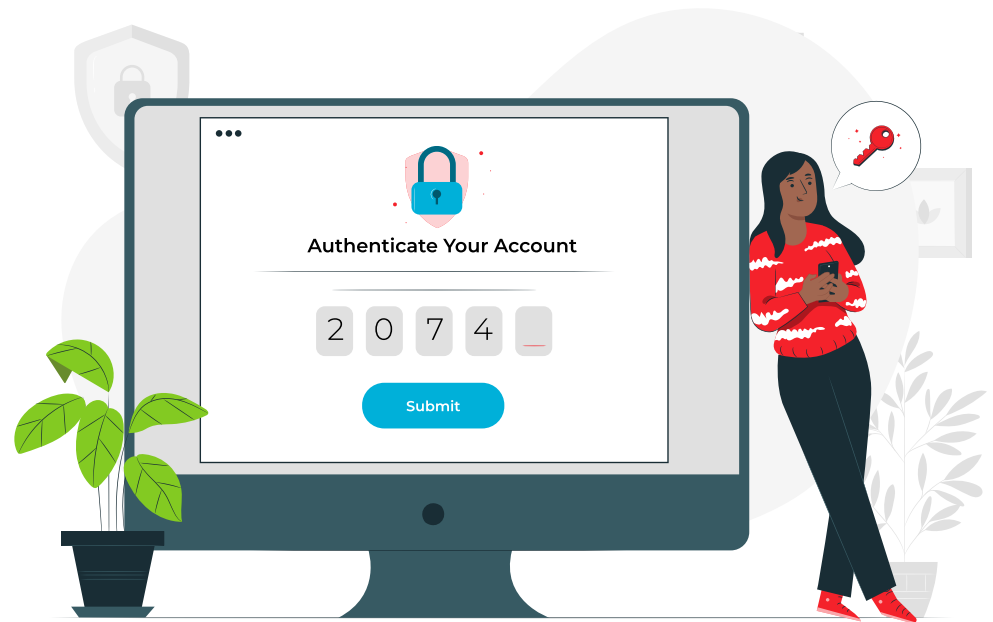
COMMITMENT OF MANAGEMENT

Data protection is an essential part of Sound of Data's core business values. These values guide our actions to deliver products and services that are secure, compliant and fully integrated in Sound of Data's preferred way of working. Living up to these values is essential for achieving our ambition to be undisputed #1 voice channel expert.

MEETING OUR COMMITMENTS

At Sound of Data, we are involved in, and dedicated to, achieving high privacy standards for our products and services through the application of the Integrated Management System (IMS) for Quality, Cyber and Information Security, and Data Protection. This management system, fully aligned to ISO standards, is implemented across our organization and verified by third-party certification bodies. To achieve our commitment;

- We ensure that adequate and appropriate cyber and information security measures are in place to prevent unlawful or unauthorized use and access or accidental loss of personally identifiable information;
- We process personally identifiable information in a fair, lawful and transparent way. Where appropriate, we will make sure that individuals know about and consent to the collection and use of their personally identifiable information;
- We only collect, process and retain the necessary personally identifiable information required to fulfill the specified purposes and we will not keep personally identifiable information for longer than is necessary for the purpose or purposes for which they were collected;
- We recognize that we are responsible for the personally identifiable information under our control, and have designated individuals responsible for compliance with these principles and all applicable data protection laws and regulations;



- And, we only process personally identifiable information as permitted by laws and regulations, and within the limits of the purposes set out in our privacy policies, notices, or contracts with clients and suppliers. In that regard we will only process personally identifiable information in line with relevant instructions from either clients or suppliers.

RESPECT PEOPLE, PLANET AND COMPANY ASSETS

COMMITMENT OF MANAGEMENT

Our heritage in connectivity, technology and customer experience forms the foundation for the unmatched skills to route over 300 Million customer interactions per year. Staying true to our values has shaped Sound of Data over more than three decades. As a proud and responsible global service provider, we are committed to conduct business with integrity and fairness, with respect for the law, our values.

MEETING OUR COMMITMENTS

We expect employees to ensure that you comply with our Company's commitments to human rights. We encourage our team, as well as our customers, suppliers and other business partners and other people affected by our activities, to speak up if you observe or suspect potential human rights breaches.

We treat people equally and fairly, based on the principle of non-discrimination. We respect cultural and individual diversity and promote inclusiveness. We employ, reward and promote people based on the principle of equal opportunity, without distinction according but not limited to race, colour, gender, sexual orientation, religion, national or social origin, age and disability.

We believe it is our responsibility to actively reduce our impact on the environment. It is our ambition to grow our business while respecting people and the planet. Within our entire value chain and wherever we operate, we pay specific attention to reduce our CO2 emissions and consumption of water, energy and raw materials, and to increase the use of renewable energies. We also focus on reducing waste through recycling and reusing.

We seek to win with integrity and fairness. It is our principle never to accept, ask for, engage

in, make, offer, promise or authorise any bribes to anyone, in any place, at any time. With bribery we mean giving or receiving anything of value to or from any person, either government officials or commercial parties, to obtain or retain business, influence decisions, or secure an improper advantage in the conduct of our business.

We do not want our business to be used by others for the purposes of money laundering, terrorist financing or any other criminal activities. Also, we do not do business with persons, entities, governments or countries if doing so violates applicable (economic) sanctions. In order to prevent any violation of anti-money laundering laws or sanctions, it is key for us to know our customers, suppliers and other business partners.

We each have a responsibility to make decisions in the best interest of our Company, without being influenced by personal considerations. It is important to avoid situations in which a conflict could arise between the Company's and your personal interests. Even the appearance of such a conflict should be avoided.

Fraud can have a significant financial and reputational impact on our Company. In order to protect the interests of all stakeholders, it is essential that we are alert of and prevent fraudulent behaviour. Fraud covers a very broad range of activities. Examples of fraud include falsifying documents, misappropriation of company assets and resources - including theft - and, in some cases, intentional misapplication of internal rules.

ROBOCALL MITIGATION PLAN

As both a legal and practical matter, all Voice Service Providers must develop a robocall mitigation plan ("RMP"), file it with the FCC and, after Commission approval, be listed in the FCC's robocall mitigation database. As part of our Business Ethics, Sound of Data is committed to this plan and audits it through its ISO 9001 certification.

BEFORE SERVICE IS ESTABLISHED FOR A NEW CUSTOMER

"Know Your Customer"

As part of the onboarding process, we collect and verify information for each commercial customer such as physical business location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer's business.

Many foreign illegal robocallers use VoIP services and DID numbers from the North American Numbering Plan ("NANP") to suggest that their calls were originated within the United States.

Mitigation Through Contracts

Customer assistance in traceback investigations are included in all service contracts. Potential whole clients require "upstream" source of illegal calls on their networks, and need to identify their own customers who originate illegal calls.

DURING SERVICE

Caller ID and Blocking

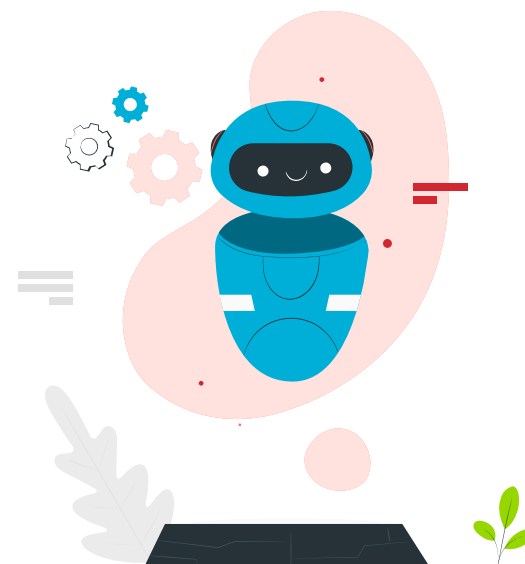
- Prevention of unknown traffic sources.
- Calls to USA are allowed only for certain customers who have requested access for dialing the USA. Before allowing access to the USA, they must agree to additional terms stating the STIR/SHAKEN framework
- IP Blacklisting is in place.

Monitor Traffic

- USA traffic is monitored 24/7
- Extensive voip monitoring software doing call detail analysis alerting our NOC for suspicious activity.

Cooperate with Investigative Bodies

- CTO/COO is the single point of contact to handle traceback requests and coordination.



THANK YOU

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