

Bartr Connect Limited Robocall Mitigation Plan

The following outlines and details Bartr Connect Limited ("BARTR") and the steps it has taken to avoid originating illegal robocall traffic as part of its robocall mitigation program:

- 1) Cooperation in Contracts: BARTR has made sure its contract is clear about the kind of traffic it will (and will not) accept from its customers. BARTR has notified them that if they do not follow the rules, they will be subject to prompt termination. If they are found sending calls that BARTR believe are illegal, they will forfeit confidentiality and their information will be shared with law enforcement and industry partners.
- 2) BARTR has made significant endeavours to know its customers and confirms the identity of new commercial customers by collecting information such as physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of customer's business. BARTR vets each customer as thoroughly as practical and possible. BARTR makes sure any suspicions are allayed before turning on service and does not give anonymous test accounts to auto-diallers.
- 3) BARTR takes quick action and follows a plan that allows it to act promptly and decisively on anything suspicious detected by its monitoring. If BARTR get a traceback notice for an illegal robocall, it does not leave the issues unresolved but rather, BARTR insist on specific, deterministic explanations with explicit corrective actions from its customers. Fraud callers and customers with sloppy controls are not to be rewarded with on-going forgiveness.
- 4) BARTR publishes its policies to its customers and maintains a record of notifying its customer(s) of its policies regarding illegal robocalls and BARTR's intolerance of them.
- 5) BARTR takes especially cautious consideration of foreign sources sending auto-dialled traffic using USA +1 telephone numbers.
- 6) Beginning in September of 2021, BARTR will ensure that all customer(s) have registered with the Robocall Mitigation Database otherwise it will not accept their traffic.
- 7) BARTR performs Call Blocking destined to specified phone numbers as appropriate for robocall mitigation.
- 8) BARTR cooperates with investigative bodies and stands ready to comply with traceback requests by law enforcement, the FCC, or the Industry Traceback Group, the official consortium designated to lead private traceback efforts. BARTR has designated a single point of contact to handle traceback requests and coordinate with outside investigations.