



VIRTUTEL SPAM and ROBOCALL MIGITATION

Virtutel is a Fixed Line Carrier in Australia and provides services only through Wholesale Channels.

As a Fixed Line Carrier, Virtutel participates in the Communications Alliance INDUSTRY CODE C661:2020 REDUCING SCAM CALLS in Australia, a registered code by the Australian Communications and Media Authority ("ACMA"). The ACMA is the regulatory equivalent of the United States Federal Communications Commission ("FCC"). Virtutel notes that the FCC has a Memorandum of Understanding ("MOU") with the ACMA for co-operation on combating robocalls, scam/spam calls and texts by exchanging information for the purpose of ensuring compliance with these laws.

Virtutel does not Terminate or Originate traffic directly to the United States, however, uses Transit providers to perform this task. Virtutel is subject to an exemption from the June 30, 2021 Robocall Mitigation Database implementation deadline pursuant to 47 C.F.R. § 64.6304(b). Virtutel Notes that its Transit providers directly participate in STIR/SHAKEN.

MONITORING

Virtutel monitors Network Traffic to assure service availability and quality, including reviewing High Network Traffic, bursts, low call completion/duration rates through proactive CDR monitoring to alert of any potential SPAM/ROBOCALL traffic. Once suspected traffic has been identified, Virtutel will collaborate with customers and our upstream providers to determine the legitimacy of the traffic.

TRACEBACK

Virtutel is fully committed to respond promptly to all traceback requests from the FCC, law enforcement, upstream Transit Providers and authorised traceback organisations in investigating and stopping any illegal SPAM and ROBOCALL traffic within 24 hours of being reported.

CUSTOMER VALIDATION

Carriage of SPAM or ROBOCALLS across the Virtutel Network is strictly prohibited in our Master Services Agreement and Service Schedules. Virtutel has rigorous processes to identify and validate the validity of any new Wholesale Customer in line with industry best practice.

BLOCKING and SUSPENDING

Once fraudulent traffic has been identified, Virtutel will suspend and block immediately the customer/carrier originating the suspicious traffic.

Virtutel is constantly working on improving the processes, education and tools that can help to prevent and/or detect any kind of fraudulent, SPAM or ROBOCALL traffic and will implement such measures and procedures as they are developed.

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