



Assuract Robocall Mitigation Approach

Assuract is an established VoIP provider based in London, England providing office and contact centre telecommunications services to UK small and medium sized businesses. We have been in operation for over 10 years and operate in the UK under the brand PiPcall (www.pipcall.com). Our customers are all UK based, established businesses who undergo an extensive KYC process and are tied into strict contracts with a fair usage policy built in. We have a full commercial and billing relationship with our customers and require proof of operation and existence such as a UK bank account and registration with Companies house.

We provide limited international connectivity to selected customers to US and other international numbers linked to their private corporate PBX system that we operate for them on a cloud basis.

Our International numbers in the USA are provided to us by Bandwidth Inc (NASDAQ: BAND www.bandwidth.com). Bandwidth have assured us that as our provider for US numbers and calls these calls will be signed (regardless of attestation level). Those calls will therefore be STIR/SHAKEN compliant. Assuract and Bandwidth have a commitment to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the Consortium, and to cooperate with such entities in investigating and stopping any illegal robocalls.

Assuract takes it's Compliance and Regulatory requirements seriously, and is committed to preventing Robocalling. Assuract has taken the following steps to address the identification and mitigation of Robocalling on our system:

Verification and Screening

The Assuract PBX system is operated by ourselves and hosted in a Tier 1 datacentre in London. Our KYC processes and onboarding, combined with minimum contractual terms means we are much less likely to have small, illegitimate companies using our system for illegal activities. We are not a Wholesale carrier, and as such we do not transit other operators' voice traffic.

Contractual Measures

We have contractually prohibited the use of the Assuract systems for Robocalling, with rights to terminate the contract if customers are found to be doing so. All customers need to sign up to our fair use policy that requires them to use our systems for legitimate and legal business purposes.

Registered Office

Assuract Limited t/a PipCall
Lower Third Floor, Evelyn Suite, Quantum House, 22 - 24 Red Lion Court, London EC4A 3EB

Tel: 0330 094 8080 **Web:** www.pipcall.com **Email:** support@pipcall.com **Registered No:** 4994562



Technical Measures

The Assuract PBX system's primary use case and technical design is a contact centre/internal sales operations and does not have the capabilities built in for Robocalling to be carried out by users.

We operate a closed system in that Assuract provides and provisions all the user agents that are used by our customers on our PBX be they physical desk phones, desktop programs or mobile applications. Customers are not permitted to link directly to our PBX with any other device or user agent.

Our PBX system has an extensive anti fraud system that prevents malicious attacks from third parties attempting to access our systems.

Reporting

As part of our fair use policy we have thresholds set for the number of calls that we expect customers to make. Alerts are automatically issued when 80% thresholds are reached to allow our engineers to verify traffic and take restorative actions if needed.

Geography

Around 95% of Assuract customers are based in the UK and make/receive calls in the UK. Our exposure to the North American market is similarly small.

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