



Volie, Inc.

**Policies and Procedures for Client Onboarding, Compliance Monitoring,
and Response to Traceback Requests**

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Introduction

In addition to its other compliance related policies and procedures, Volie seeks to maintain a robust program to prevent illegal calls from originating from its platform. The Federal Communications Commission defines “illegal calls” and “illegal traffic” as calls that violate (i) the requirements of the Telephone Consumer Protection Act of 1991 (“TCPA”) or the Truth in Caller ID Act of 2009 (“TCIDA”); (ii) the related Commission regulations implementing the TCPA and TCIDA; (iii) the Federal Trade Commission’s Telemarketing Sales Rule; or (iv) any federal or state law or regulation that prohibits calls made for the purpose of defrauding a consumer.

Volie’s program will follow the Commission’s best practices as outlined in its December 30, 2020 Fourth Report and Order in CG Docket No. 17-59 which requires every voice service provider to: (i) respond to traceback requests from the Commission, civil and criminal law enforcement, and the Commission’s official designated Traceback Consortium (currently the USTelecom Industry Traceback Group); (ii) take steps to effectively mitigate illegal traffic when it receives actual written notice of such traffic from the Commission; and (iii) implement affirmative, effective measures to prevent new and renewing clients from using its network to originate illegal calls.

Volie has completed full implementation of STIR/SHAKEN.

Policy and Procedure for Client Onboarding

Policy

Volie will utilize the client onboarding process to (i) identify the client seeking to use Volie's services, and (ii) determine the risk that such client may use the Volie system to originate illegal traffic.

Additionally, a Letter of Authorization is required prior to porting any numbers to any of Volie's underlying carriers. Volie monitors all calls originating from its own network and will block all calls that it identifies as not meeting FCC standards.

All calls made via the Volie platform are monitored for: calls with missing caller IDs, calls from an unknown caller ID, and call patterns that may indicate illegal calls.

Volie's Master Licensing Agreement is a guide for its customers to understand the intended and permissible uses of its service, and to prevent exploitation, fraud and abuse.

Procedure

1. Prior to activating a client's campaign, Volie will require the client to complete the Initial Client Due Diligence Questionnaire (reproduced below) to confirm the legitimacy of each Client.
2. The Compliance Officer or their designee will review the completed Initial Client Due Diligence Questionnaire and take any additional steps as explained in the Instructions to Initial Client Due Diligence Questionnaire (reproduced below).

Initial Client Due Diligence Questionnaire

CONFIDENTIAL

Federal law requires those engaged in telemarketing to “Know Your Customer,” which means that you will need to provide important information before using the Volie Services. *Please note:* the client is required to provide updates to any information within 30 days of any change.

All fields on the Know Your Customer Form are required, and the form must be filled out in its entirety upon submission. Once it is submitted, it will be sent to the compliance team for review and it cannot be updated by the user.

In general, the information related to these categories:

1. Your company
2. The background of those key persons involved
3. How you intend to use the Volie Services
4. Your Written Do Not Call Policy

Volie Services cannot be provided until Due Diligence Questionnaire is completed and reviewed.

The information you provide below is accurate as of [insert date here]:

1. Company Information

Please provide the full legal name of your company (i.e., the name used in incorporation).

Business Name: _____

Business Address: _____

Entity Type: _____

Entity Status: Private ☐ Public ☐ Non-Profit ☐ Government ☐

State of formation: _____

Date of formation: _____

Federal Taxpayer Identification Number (EIN): _____

Is the company in “good standing” with state business registration (i.e., still considered active)?
Yes ☐ No ☐

Number of years in business: _____

Dealer principal(s):

Website URL:

Social Media URL(s):

2. Current Key Personnel

Please provide the following information for the identified roles:

Primary Business Contact

Name: _____ Title: _____
Email: _____ Phone: _____

Primary Compliance Contact

Name: _____ Title: _____
Email: _____ Phone: _____

3. How Will You Use the Volie Services?

Your “Business Model.” Volie customers typically use the Volie Services in one or more of the following ways. Please indicate the “models” you intend to use:

1.	Direct:	You will be making calls regarding your own products/services.	Yes ☐ No ☐
2.*	On behalf of others:	You will be making calls on behalf of a third party and its products/services.	Yes ☐ No ☐
3.*	Third Party Use:	You will permit third parties to use your Volie account to make calls (requires Volie approval).	Yes ☐ No ☐

**These models are known as “BPO” or “Business Process Outsourcing.”*

If you intend to use Volie for BPO services (as described in “Models” 2 and 3 above), then you are required to conduct similar due diligence on your customer.

Will company perform this KYC due diligence? Yes ☐ No ☐

Will company engage Volie to perform this KYC due diligence? Yes ☐ No ☐

Who Is Calling? Who are the individuals using your Volie account to make calls?

Employees Yes ☐ No ☐

Independent contractors Yes ☐ No ☐

Third Parties Yes ☐ No ☐

What country(ies) are your calls originating from? _____

What DBAs Are Being Used? Please list the “DBAs” (“doing business as”) that will be used in campaigns using the Volie Services. Please also list the state/county/city where registration of each DBA has been obtained.

DBA	City, County, State	DBA ID Number

What Products/Services are you marketing? Please list and describe all products/services to be marketed using Volie:

4. Detailed Questions & Requests

Company Information

1. Is the company subject to pending, or in the past 5 years completed, litigation or regulatory investigations/actions related to telemarketing, teleservices, marketing, sales, or consumer protection issues? Yes ☐ No ☐

If yes, please provide a copy of the complaint or regulatory action and any resolution.

2. Has the company or any of its key employees ever been found guilty or pled guilty or nolo contendere to a crime involving theft, fraud, violation of telemarketing laws, or the use of any untrue, deceptive, misleading, or unconscionable representation, act, or practice? Yes ☐
No ☐
3. Does the company hold all required telemarketing or telephonic sales registration/licenses related to the campaigns for which it will use the Volie services? Yes ☐
No ☐
4. Does the company have a written telemarketing policy, practice, and/or procedure documenting or describing compliance with applicable telemarketing laws, including, without limitation, the Telephone Consumer Protection Act, the Telemarketing Sales Rule and similar state laws? Yes ☐
No ☐

If yes, please provide copies of the written policy, practice, and/or procedure documenting or describing compliance.

Do Not Call Registry. You must have a written Do Not Call Policy if you are engaging in telemarketing, per federal regulations. The questions below are provided as topic areas that are communicated in a written Do Not Call Policy. *(Answers Not Required If Not Engaging In Telemarketing)*

1. Do you subscribe to the National Do Not Call registry?
If so, please provide your Subscription Account Number for accessing the DNC Registry: ☐
Yes ☐
No ☐

2. Do you subscribe to all applicable State Do Not Call registries? Yes ☐
No ☐
3. Do you honor all company-specific Do Not Call requests from consumers and maintain an internal Do Not Call list as required by state and federal laws? Yes ☐
No ☐
4. Do consumers who have asked to be placed on your internal Do Not Call list remain on the list unless subsequent Prior Express Written Consent has been obtained from the consumer or their number has been disconnected and reassigned to a new subscriber? Yes ☐
No ☐

Please provide us with a copy of your Written Do Not Call Policy.

Caller ID Practices: Per federal regulations, any person or entity is prohibited from altering or manipulating caller identification information with the intent to defraud, cause harm, or wrongfully obtain anything of value.

1. Describe the company's caller ID practices for outbound calls it initiates:
2. Does company represent and warrant that it has not engaged in any illegal caller ID spoofing? Yes ☐
No ☐
3. Will company use its own caller ID (DID) phone numbers? Yes ☐
No ☐

Volie Robocall Policy

A robocall is defined as an automated telephone call initiated by a computer program using an auto-dialer or predictive-dialer where a pre-recorded message may be played to a US consumer. We have zero tolerance for illegal robocalling where, (1) calls are made from spoofed IDs, or (2) calls to US consumers are made by fraudulently posing as a government agency, large corporation, or any other entity, with the intent to defraud a US consumer.

- ☐ I affirm that the information provided is accurate and I certify that all information and answers to questions herein are complete, true and correct to the best of signatory's knowledge and belief.
- ☐ I affirm that I will update the information provided within 30 days after any changes.
- ☐ I affirm that I and any person I permit to use my Volie account will comply with federal and state telemarketing laws and regulations, including the TCPA, the TSR, and the Truth in Caller ID Act.
- ☐ I understand that any alleged or proven violations of any telemarketing law or consumer protection law may lead to my Volie services being terminated.
- ☐ I acknowledge that Volie will be processing the information provided for the purposes of identity verification, and that Volie reserves the right to retain the information after account closure.
- ☐ I acknowledge that Volie retains the right to deny credit or close the account whenever it is deemed necessary.

Signature	Date
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Instructions

(INTERNAL USE ONLY: Do NOT Send with Questionnaire)

1. Supply due diligence (“Know Your Customer”) questionnaire to prospective client and work with client to obtain complete and accurate answers.
2. After receiving the completed questionnaire, search the client’s name, the DBAs provided by the client, and the name of any known key personnel, in Google, PACER, Federal Trade Commission, and Federal Communications Commission websites to look for any undisclosed regulatory actions.
3. If questionnaire or investigation reveals regulatory actions or criminal actions against client or key officers, elevate to Volie’s President for risk evaluation in collaboration with counsel.
4. If client does not have all required telemarketing licenses, seek additional information regarding missing licenses and evaluate whether the campaign may be narrowed to exclude jurisdictions for which required licenses have not yet been received.
5. If client does not provide a Do Not Call policy, request that client work with its counsel to develop and provide one. At minimum, the policy must discuss how client places a number on its internal Do Not Call list, the timeframe for placing the number on the internal Do Not Call list (no more than 10 business days from receipt of Do Not Call request), how client complies with federal and state Do Not Call registry scrubbing requirements, and how client responds when a consumer requests a copy of its Do Not Call policy.
6. If client lists DBAs but does not provide evidence of DBA registration, request that client register the applicable DBA(s) and supply evidence of registration.
7. Evaluate responses to other items and request additional information from the client as needed to evaluate risk posed by client’s proposed use of the Volie system.
8. Once the review is complete and all necessary materials gathered, assign a risk rating (low, medium, or high) and submit for final approval to the President
9. Schedule for an annual review to verify information remains current.

Post-Complaint Due Diligence Policy and Procedure

Policy

Volie will conduct additional due diligence on clients about whom Volie receives a complaint alleging illegal traffic from the Federal Communications Commission (“FCC”), Federal Trade Commission (“FTC”), other law enforcement agencies, or the Industry Traceback Group (“ITG”).

In recognition of the increased potential for erroneous complaints from certain sources, Volie may choose to activate all or part of this policy for complaints received from voice service providers, consumers, or consumer protection organizations such as the Better Business Bureau; however, such activation is discretionary as determined by Volie’s President.

Procedure

1. Complaints alleging illegal traffic shall be forwarded to the Compliance Officer.
2. The Compliance Officer or their designee will determine the timeframe in which to respond to the complaint. If the required timeline cannot be met, the Compliance Officer or their designee will contact the complainant with the timeline for response.
3. The Compliance Officer or their designee will conduct additional due diligence on the client and call about which the complaint relates. Legal counsel may be engaged. If the complaint is an official written notice of illegal traffic from the FCC Enforcement Bureau, Volie’s investigation and response will comply with the FCC’s Fourth Report and Order in CG Docket No. 17-59 dated December 30, 2020, at paragraphs 22-31. See Fourth Report and Order, paragraphs 22-31.
4. The Compliance Officer or their designee will regularly review complaints to identify clients subject to Volie’s High-Risk Client Audit based on their complaint history.

High-Risk Client Audit Policy and Procedure

Policy and Purpose

Volie offers a calling platform to its clients. As a matter of policy, Volie adheres to all applicable laws, rules, and regulations, and requires its clients to do the same. Certain clients, identified as “high-risk” clients, are at an elevated risk for noncompliance, which may likewise increase Volie’s legal liability. Because Volie wishes to ensure compliance and reduce risk, it enacts policies instituting an audit procedure for high-risk clients.

For purposes of these policies “High-Risk Client” means a business or principal that pays for telephony service via stored-value cards (e.g. gift cards), cryptocurrency, or money-transfer businesses (e.g. Venmo®, Zelle®, Cash App®, PayPal®, Western Union®, etc.) or is blocked by another voice service provider’s network after being determined by the FTC to carry bad traffic. Other indicators of a “High-Risk Client” include: (a) using Volie’s platform with an estimated or actual call/text volume in excess of one million (1,000,000) calls/texts per month or (b) which (i) has, based on Volie’s research, a history of regulatory enforcement action with the Federal Trade Commission (“FTC”), Federal Communications Commission (“FCC”), or other regulatory body; (ii) sells products that are targeted towards seniors, individuals who speak English as a second language, or other vulnerable populations; (iii) sells vehicle service contracts as a standalone product, debt relief or foreclosure assistance, health supplements, home security, business opportunities, or products relating to the COVID-19 virus; or (iv) is an existing client and has been the subject of an unreasonable number of traceback requests and/or regulatory complaints relating to their use of the Volie Services, as determined by Volie in its sole discretion. Additionally, Volie may, in its sole discretion, designate a business or principal as a “High-Risk Client”.

Audit Policies and Procedures for High-Risk Clients¹

Volie’s Compliance Officer will ensure that Volie conducts audits of all High-Risk Clients identified by Volie currently using the Volie Services. Volie’s Compliance Officer will:

1. Request proof of prior express written consent for all relevant campaigns;
2. Review the FTC’s Do-Not-Call Complaint file;
3. Search the FTC and FCC websites and perform a general Google and PACER search to identify new matters, whether lawsuits, regulatory actions, press releases, or otherwise, involving the High-Risk Client;
4. Review scripts from the High-Risk Client;
5. Review the names of at least two trade or bank references if using credit card or any form of payment other than bank wire transfer or ACH;
6. Obtain an opinion from High-Risk Client’s counsel that lead forms used to obtain leads in which the High-Risk Client utilizes the Volie Services provide prior express written consent as needed;
7. Obtain an attestation from the High-Risk Client that the High-Risk Client is not subject to any active or pending investigations, lawsuits, or regulatory enforcement; and

¹ Any deviation from these policies and procedures must be approved by Volie’s President.

8. Review and analyze all traceback requests pertaining to the High-Risk Client during the audit period and High-Risk Client's responsiveness to same.

All papers, documents, records, and logs used, obtained, or created by Volie for purposes of this audit will be maintained in a secure location for a period of no less than five (5) years.

Volie may elect to request clients to reaffirm their commitment to compliance by executing an Agreement to Reaffirm Compliance Obligations and Duties. Use of the Agreement as a compliance mechanism is at the discretion of Volie senior leadership, but it will be considered when a client has been subject to the High-Risk Client Audit Procedures, requests atypical services or access to the Volie system, or has a prior history of regulatory enforcement.

Responding to Traceback Requests Policy

Policy

Volie will respond to all traceback requests from the Federal Communications Commission ("FCC"), Federal Trade Commission ("FTC"), and other law enforcement agencies as well as the Industry Traceback Group ("ITG") within twenty-four (24) hours of receiving notice of the request (or such other time frame specified by the requesting entity, if greater than twenty-four (24) hours), if possible. If it is not possible to respond within the designated time frame, Volie will communicate its timeline for response to the requesting entity.

The Compliance Officer or their designee will track Traceback Requests to identify clients subject to the High-Risk Client Audits.