



200 ENGINEERING LLC

ROBOCALL MITIGATION DATABASE PLAN AND PROCEDURES

200 engineering is committed to identifying, reducing, mitigating, and abolishing the various cases that arise within the telecommunications market, such as unwanted and illegal automated calls, supporting policies and complying with regulations of the Federal Communications Commission (FCC or Commission) in the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act In this document, we will show the development of the different policies, processes and standards that we established as a plan for the mitigation of automatic calls (RMP) In addition, we will provide a detailed description of our processes and establish strict compliance with the regulations governing the telecommunications market.

200 Engineering has put its greatest efforts into identifying unwanted and illegal automatic calls by carrying out identification, monitoring, and evaluation processes for customers according to the standards of the Federal Communications Commission (FCC or Commission).

Below we detail our mitigation plan and established processes.

1. 200 ENGINEERING Traffic Analysis and Network Monitoring

Our technical department carries out a series of processes to identify possible unwanted or illegal calls through a report of behavior or patterns that are suspicious of being illegal automatic calls such as short duration calls, calls with



uncommon durations, and calls rejected by our platform based on a Blacklist or Blocked numbers database, as well as calls with invalid Ani's and repeated error codes as (404 - 503) in a constant conduct.

If anomalies and confirmed behaviors of illegal automatic calls and their derivatives are detected, 200 Engineering will take immediate action against the company or platforms from where such activities are detected, definitively blocking the IPs from where the traffic or received calls originate.

2 . 200 ENGINEERING KYC (KNOW YOUR CUSTOMER) Process

Our company implements new procedures in the Know Your Customer policy to verify and authenticate the information and identity of its existing and new customer databases, requesting periodic information updates (annually) to be aware of possible changes in the administrative and operational structures of our allies.

We request information such as the nature of your business, technical details such as the type of platform to be used, banking information and commercial references; as well as federal taxpayer identification number or equivalent, company address and telephone numbers.



3. Acceptable Use Policy 200 Engineering.

200 Engineering, within its customer onboarding process, establishes the acceptance of terms and conditions within which the rights, obligations and duties of suppliers and customers are established. These include:

- Engaging in any unsolicited advertising, marketing, or other unlawful activities using the Services that violate laws applicable to advertising, electronic communications, and telemarketing, including, but not limited to, Section 5 of the FTC Act (15 U.S.C. § 45), the CAN-SPAM Act (15 U.S.C. §§ 7701-7713), the Telemarketing Consumer Fraud and Abuse Prevention Act (15 U.S.C. §§ 6101-6108), the Federal Trade Commission Telemarketing Sales Rule (16 C.F.R. § 310 et seq.), the Telephone Consumer Protection Act (47 U.S.C. §§ 227), the Federal Communications Commission regulations (47 C.F.R. 64.1200 et seq.) and orders implementing the Telephone Consumer Protection Act, and all federal and state Do Not Call and calling-time restriction laws and regulations.
- Creating a false identity, forged email address or header, phone number, or otherwise attempting to mislead others as to the identity of the sender or the origin of a message or phone call, including failing to comply with the Truth in Caller ID Act.
- Using the Services to engage in any activities that are illegal, abusive, false, fraudulent, deceptive or misleading, or any activity that exploits, harms, or threatens to harm children.



4. Telephone Number Authorization and STIR-SHAKEN.

We have a serious commitment to implementing the STIR/SHAK protocol within less than 3 months, defining in a real way the compliance of this Using all the technological alternatives that we have at our disposal to guarantee the authentication of calls while we achieve its implementation All of this in accordance with the laws and regulations governing the agencies responsible for requesting information about activities related to robocalls, as well as alternative processes that can be done independently to help us reduce the risk of unwanted robocalls.

5. Commitment to Trace-Back Cooperation

200 Engineering LLC is committed to timely cooperation with tracking requests made by entities such as ITG (assigned by FCC), to provide or develop investigations, demands or other actions related to compliance with the norm, as well as to investigate suspicious activities found within its network or reported by its clients; At 200 Engineering, we will make available all the necessary resources to comply with this decree.