

peoplefone AG
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Peoplefone AG

Federal Communications Commission Robocall Mitigation Plan

Document Versions

Revision	Date	Description
1.0	January 10, 2023	Creation of document
2.0	April 15, 2024	Review and update
3.0	February 13, 2026	Review and update

I. Introduction

Peoplefone AG is a foreign Voice over Internet Protocol (VoIP) service provider registered at Albisstrasse 107 in 8038 Zurich, Switzerland with Swiss company identification number CHE-112.382.720. Since 2005, the company is registered as official Telecommunication Service Provider (TSP) at the Swiss Telecommunication Regulator "OFCOM" with the identification number 2511174.

Peoplefone AG is a Swiss limited company owned by private shareholders and with following Corporate Directors as of February 13, 2026:

CEO	Christophe Beaud	christophe.beaud@peoplefone.com
COO	Danette Beaud	danette.beaud@peoplefone.com
CTO	Laurent Schweizer	laurent.schweizer@peoplefone.com
CSO	Nicolas Urech	nicolas.urech@peoplefone.com
CBDO	Xavier Oltramare	xavier.oltramare@peoplefone.com

As of February 13, 2026, Peoplefone AG is the parent company of the following subsidiaries and affiliates:

Peoplefone Internet Telephony GmbH	Austria
Peoplefone SAS	France
Peoplefone GmbH	Germany
Peoplefone India Private Limited*	India
Peoplefone UAB	Lithuania
Peoplefone Polska SA	Poland
Peoplefone Slovakia s.r.o.	Slovakia

**Provides only software development, and is not a foreign voice service provider*

As a foreign provider, Peoplefone AG has not deployed the STIR/SHAKEN standard since it is not mandated under Swiss and European law. Given its status as a foreign voice service provider, Peoplefone AG also does not have an Operating Company Number (OCN).

II. Robocall Mitigation Plan

A. Know-Your-Customer Protocols

Peoplefone AG requires new and renewing customers to register their business address and contact information with the company. Additionally, Peoplefone AG's onboarding documents request proof of address, including the customer's company registration information. Moreover, Peoplefone AG does not do business with companies using predictive dialers, and prepaid customers are only onboarded if they pay in advance.

Know Your Upstream Provider

Peoplefone AG has incorporated reasonable procedures designed to ensure that it knows its upstream providers. Among other things, Peoplefone AG exercises reasonable due diligence before it begins accepting traffic from its upstream providers including the collection of certain information that includes, but is not limited to, obtaining each upstream provider's physical business location, contact person(s), state or country of incorporation, and other relevant

information. In addition, Peoplefone AG's contractual agreements with its upstream providers include provisions that can be exercised to address instances of suspected unlawful robocall traffic. Finally, Peoplefone AG has operational measures in place whereby it continues to work closely with its upstream providers to identify, investigate, and mitigate, suspected unlawful robocall traffic.

B. Robocall Mitigation Contractual Terms

Peoplefone AG customers can buy Peoplefone AG numbers or import (porting in) their numbers into the Peoplefone AG network. Peoplefone AG requires that all outbound calls display a number belonging to the customer, with the exception of calls made using call forwarding.

Peoplefone AG contracts also include the following provisions:

- Terms and conditions that (1) obligate customers not to use Peoplefone AG's services for unlawful purposes and/or (2) preserve Peoplefone AG's right to terminate customers for violations of Swiss, European and/or U.S. laws.
- Terms and conditions that obligate customers to: (1) notify Peoplefone AG immediately of unauthorized access and use of Peoplefone AG's services, and (2) avoid using Peoplefone AG services to transmit communications that are illegal under Swiss, European and/or U.S. laws.
- Provisions that permit Peoplefone AG to bar or suspend further services where: (1) a customer has materially breached their contract with Peoplefone AG; or (2) the customer is using Peoplefone AG's services in violation of Swiss, European and/or U.S. laws.

C. Analyzing and Monitoring Outbound Traffic

Peoplefone AG's network operations center limits outgoing call volumes through continuous monitoring of customer and call volume statistics, including ranking communications by calls and minutes. Peoplefone AG has also implemented antifraud algorithms in order to stop (1) customer hacking and (2) illegal traffic or traffic prohibited under Peoplefone AG's customer contracts.

Peoplefone AG network monitoring capabilities also include monitoring call traffic for suspicious patterns, with immediate notifications to the management in the event of suspicious patterns.

D. Investigating Suspicious Traffic

Peoplefone AG is compliant with the fraud clauses in all agreements with its partners and carriers. Moreover, Peoplefone AG obtains U.S. numbers from VOXBONE/BANDWIDTH and DIDWW and follows all applicable recommendations to mitigate illegal robocall traffic.

Peoplefone AG has a Chief Security Officer (CSO) and dedicated personnel that investigate suspected illegal robocalls. Peoplefone AG will also engage appropriate employees to investigate suspicious calling patterns when they are identified.

Once a characteristic fraudulent behavior is detected or alerted to Peoplefone AG, Peoplefone AG analyzes the case and through its customer service management team liaises with the customers involved to assess the situation, and if needed, request remedial actions to prevent or block future fraudulent activity. Other relevant teams, such as engineering, can be involved when required to investigate the matter.

Peoplefone AG collaborates with other carriers expeditiously and in good faith to investigate suspicious activity. If remedial actions are not implemented by a Peoplefone AG customer, or if so requested by the carrier, Peoplefone AG takes appropriate action including the blocking of the calls, or termination of the customer.

E. Participation in Industry Traceback Group

Peoplefone AG takes unwanted and illegal robocalls seriously and is committed that its network is not utilized for the origination of such calls. Subject to applicable Swiss and European laws, Peoplefone AG will review, document, and respond to traceback requests from the Industry Traceback Group or the FCC immediately, and in no case in a time frame shorter than 24 hours.

Peoplefone AG provides the following information for the designated individual responsible for responding to traceback inquiries from the FCC, the Traceback Consortium, and law enforcement agencies.

Name: Laurent Schweizer
Title: Chief Technology Officer
Department: Technical
Business Address: Albisstrasse 107, CH-8038 Zurich, Switzerland
Number: +41 21 552 20 00
Email: management@peoplefone.com

F. Certifications

1. Robocall Mitigation Plan

All calls Peoplefone AG originates or transits on its network is subject to this Robocall Mitigation Plan.

2. Filling in the Robocalling Mitigation Database

Peoplefone AG certifies its prior certification filed in the Robocall Mitigation Database has not been removed by Federal Communications Commission action, nor has it been prohibited from filling in the Robocall Mitigation Database pursuant to a law enforcement action.

3. Enforcement Actions and Investigations

Given its role as a foreign voice service provider, Peoplefone AG is not subject to the jurisdiction of the Federal Communications Commission, or other United States law enforcement, or regulatory agencies. Notwithstanding the foregoing, neither Peoplefone AG nor any entity with which Peoplefone AG shares common ownership, management, directors, or control, has been the subject of a formal Federal Communications Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to Peoplefone AG transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description in the prior two years.