

Forward Lending, Inc. d/b/a Method Financial Robocall Mitigation Plan

Implemented: April 29, 2024

1. Robocall Mitigation Plan Introduction

The following Robocall Mitigation Plan details the policies and practices that Forward Lending, Inc. d/b/a Method Financial (“Method”) has established to prevent the origination and transmission of unlawful robocalls in connection with calls subject to Method’s services. In general, this Robocall Mitigation Plan provides information regarding Method’s:

1. Know Your Customer (“KYC”) protocols
2. Contractual terms;
3. Monitoring and investigation of suspicious calling patterns; and
4. Commitment to cooperate in traceback requests.

2. Company Summary

Method is a service provider to entities such as banks, credit unions, and financial technology companies (collectively, “Partners”) that offer financial products and services to their end users (“Partner Customers”). Method partners solely with Bandwidth, who originates voice traffic associated with Method’s services.

As such, Method is not a voice service provider, foreign voice service provider, non-gateway intermediate provider, or gateway provider, as those terms are defined by the Federal Communications Commission (“FCC” or “Commission”). Nevertheless, Method has registered in the Robocall Mitigation Database (“RMD”) and is filing this Robocall Mitigation Plan out of an abundance of caution and consistent with its commitment to prevent unlawful robocalls.

Method does not have any affiliates, subsidiaries, or parent companies. Method’s principals are identified in Exhibit A to this Robocall Mitigation Plan. Consistent with the FCC’s rules and regulations, Method also provides the following information:

- Method’s FRN: 033464140
- Method’s Operating Company Number (“OCN”): Method does not currently have an OCN
- Method’s DBA name(s): Method Financial, Method

- Method's Previous Business Names: None
- Method's Primary Address: 2261 Market Street #4192 San Francisco, CA 94114

3. STIR/SHAKEN Status

Because Method is not a voice service provider, non-gateway intermediate provider, or gateway provider, Method does not have an obligation to deploy the STIR/SHAKEN standard. However, Method's voice service provider partner Bandwidth provides STIR/SHAKEN attestations for all calls associated with Method's services.

4. Method's Robocall Mitigation Plan

The plan below describes how Method is meeting the FCC's obligation to take affirmative, effective measures to prevent new and renewing customers from originating illegal calls.

Know Your Business (KYB) and Know Your Customer (KYC) Protocols

Method maintains separate KYB/KYC protocols for its Partners and Partner Customers. With respect to its Partners, Method collects the Partner's: (1) legal name; (2) DBA; (3) Taxpayer Identification Number; (4) State of incorporation/organization; (5) business license number; (6) principal place of business address; (7) website URL; and (8) ultimate beneficial owner information. Method uses this information to complete a KYB analysis pursuant to its written Policies and Procedures.

As part of the KYC onboarding process for Partner Customers, obtains personal identifiable information ("PII") such as: (1) the Partner Customer's name; (2) mobile phone number; (3) date of birth; (4) residential address; (5) and/or their social security number. Method uses this information to complete a KYC analysis pursuant to its written Policies and Procedures.

Finally, Method will only initiate outbound calls in instances where it has verified and confirmed: (1) Partner and Partner Customers consent to utilize Method's services; (2) the above KYB/KYC information, and (2) an established customer relationship between a Partner and Partner Customer.

Know Your Upstream¹ Provider

Method operates with a single provider (Bandwidth) to originate all voice traffic associated with Method's services. The relationship between Method and Bandwidth involves strong contractual terms and includes close coordination on robocall mitigation and investigation.

¹ As detailed above, Method is not a voice service provider, non-gateway intermediate provider, or gateway provider.

Method obtains all its telephone numbers from this single provider. Method never reassigns its numbers to any third-parties, nor are they directly provided to our Partners or Partner Customers. Method's Partners and Partner Customers cannot themselves generate any calls, provide altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call.

Contractual Terms

Method includes relevant provisions in its contracts with new and renewing Partners and subscribers (including Bandwidth) that can reasonably be expected to reduce the origination of illegal robocalls. For example, Method's contracts include the following types of provisions:

- **Compliance with Federal and State Laws:** Method's contracts and/or terms of service require its Partners and Partner Customers to comply with all federal and state laws, utilize Method's services in a lawful manner, and expressly prohibits the use of Method's services for various industries or for fraudulent, unlawful deceptive, or abusive purposes, or to otherwise harm any third parties.
- **Payment Terms:** Method only accepts payments through a verifiable method, electronic bank transfers (ACH). Method expressly prohibits payment through other non-traceable mechanisms such as gift cards.
- **Termination of Service:** Method's contracts and/or terms of service permit it to audit Partners' use of Method's services and deny or restrict access to Method's services, without notice in certain instances, if Method determines, in its sole and reasonable discretion, that a Partner and/or Partner Customer has violated Method's terms, presents unreasonable risk to Method, or otherwise engaged in any conduct or activities that violates the letter or spirit of any of its terms, any applicable laws, or the rights of third-parties.

Network Monitoring & Investigation of Suspicious Traffic

Method utilizes its own internal resources, systems, and frameworks to monitor and analyze its network for suspicious robocall traffic and does not rely on third-party call analytics systems. Method's framework enables the real-time monitoring, reporting, and analytics of all its outbound calls. Method also retains its inbound and outbound call detail records consistent with industry standards.

Traceback and Enforcement Cooperation

Method certifies that it will actively cooperate with all traceback stakeholders including Bandwidth, the FCC, law enforcement, and the FCC's registered Traceback Consortium, which is currently the Industry Traceback Group (ITG) to investigate illegal robocalls. Method will therefore respond within 24 hours to all traceback requests from

the Commission, the Traceback Consortium, and law enforcement agencies, consistent with the FCC's rules and regulations. Method dedicates sufficient resources to provide timely and complete responses to any traceback requests.

In furtherance of this policy, Method provides the following information for its designated individual responsible for responding to traceback inquiries from the FCC, the Traceback Consortium, and law enforcement agencies:

Contact Name: Mit Shah
Contact Title: Chief Operating Officer
Contact Address: 2261 Market Street #4192
Contact City: San Francisco
Contact State and Zip Code: California 94114
Contact Telephone Number: (512) 500-0409
Contact Email: tracebacks@methodfi.com

5. Certifications

Filling in the Robocalling Mitigation Database

Method certifies that its prior certification filed in the Robocall Mitigation Database ("RMD") has not been removed by FCC action, nor has it been prohibited from filling in the RMD pursuant to a law enforcement action.

Enforcement Actions and Investigations

Method, has not been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to Method 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.

Sincerely,
Mit Shah
Co-founder & COO, Method

Exhibit A – Company Principals

Name	Title
Jose Bethancourt	Co-Founder, CEO
Marco del Carmen	Co-Founder, CTO
Mit Shah	Co-Founder, COO
Phil Chang	General Counsel