



Sabio Ltd

Robocall Mitigation Plan

I. Introduction.

This document details the “reasonable steps” that Sabio Ltd (“Sabio”) has taken to avoid the origination, carrying, and/or processing of illegal robocall traffic as part of its robocall mitigation program, policies, and procedures. Among other things, this document describes the analyses that are performed and actions taken by Sabio and its underlying carriers to identify service providers, individuals, businesses, and phone numbers that are likely to be associated with illegal robocalls; to ensure prospective customers and peering partners are unlikely to generate or pass illegal calls; to monitor existing customers and partners for traffic patterns and other information indicative of the potential for transmitting illegal robocalls; and to mitigate the acceptance and transport of illegal robocall traffic on the Sabio network.

Sabio takes a variety of steps to avoid the origination, carrying, and/or processing of illegal robocall traffic as part of its robocall mitigation program. As described with particularity below, these robocall mitigation techniques include: (a) taking affirmative, effective measures to prevent new and renewing customers from originating illegal calls under Sabio’s “know your customer” (or “KYC”) initiatives; (b) implementing “know your upstream provider” procedures to mitigate illegal robocalls entering Sabio’s network; and (c) works with its upstream providers to deploy call analytics systems and other tools to identify and block illegal traffic.

II. Know Your Customer Policies and Procedures.

Sabio provides enterprise voice services and works hard to understand its customers’ unique business needs. As part of the process of onboarding a customer and deploying a voice service tailored to the customer’s needs, Sabio necessarily develops a working relationship with the customer. A prospective customer is also required to provide contact information, including a point of contact at the company, a physical address, email address, and phone number, and to establish a method of secured and verifiable payment. These policies enable Sabio to make an initial risk assessment regarding whether a prospective customer might intend to abuse Sabio’s service by making illegal robocalls and to identify and terminate the service of a customer if it is identified as making illegal robocalls.

Additionally, all Sabio customer contracts prohibit the customer from using Sabio’s service to engage in illegal activity, including making illegal robocalls. Sabio’s policy is to terminate service to any customer found to be in violation of these provisions.

III. Know Your Upstream Provider Policies and Procedures.

Sabio works closely with its upstream providers to avoid the origination, carrying, and/or processing of illegal robocall traffic, and it undertakes extensive “know your upstream provider” efforts, in its capacity as an enterprise voice service provide, to minimize as much as practicable the possibility that the networks with which it exchanges voice traffic do not transmit illegal traffic to Sabio’s network. Sabio currently works with several upstream providers to enable Sabio’s VoIP service. Each of Sabio’s upstream providers are well-known, highly regarded service providers that are also publicly committed to robocall mitigation. Sabio does not have access to technical facilities to implement STIR/SHAKEN. Therefore, it relies on its upstream

providers for the STIR/SHAKEN authentication attached to calls on Sabio's network. Sabio has fully implemented STIR/SHAKEN through its upstream providers.

IV. Analytics-Based Systems and Other Robocall Mitigation Techniques

Sabio has fully implemented the STIR/SHAKEN call authentication framework across its entire network, and Sabio adheres to the applicable FCC rules and industry standards for call authentication in its capacity as an enterprise voice services provider. When or if Sabio receives any traceback requests from the Commission, law enforcement, or the industry traceback consortium, Sabio is committed to fully responding to such requests in a timely manner. It is Sabio's policy to cooperate with the Commission, law enforcement, or the industry traceback consortium in investigating and stopping any illegal robocallers that use Sabio's service.

Because Sabio offers enterprise level service, its customers have different call blocking and call authentication needs than residential customers. As noted above, Sabio has fully implemented STIR/SHAKEN, so its customers can benefit from the trust associated with authenticated calls. To the extent Sabio's customers request additional tools to address spam calls or other illegal robocalls, Sabio will work with its customers to provide the call authentication tools that best serve its customers' needs.

Sabio Ownership and Affiliates

Sabio Ltd (Sabio) is an indirectly wholly owned subsidiary of Seattle Topco Limited, an England and Wales corporation, which is closely held. Seattle Topco Limited's controlling interest is held by private equity fund Horizon Capital 2013 General Partner Limited. Various other minority shareholders own less than ten percent (10%) of Seattle Topco. Lee Shorten is the chairman of the board for both Seattle Topco's and Sabio.

Sabio's parent companies include:

Seattle Topco Limited
Seattle Midco Limited
Seattle Holdco Limited
Seattle Bidco Limited

Sabio's other affiliates/subsidiaries, the vast majority of which do not do business in the U.S., include:

Corporate Communications (Holdings) Limited
Worldstone, Inc. (U.S. Delaware corporation)
Sabio (WS) Limited
Sabio Holdings France SAS
Sabio France SAS
CC Maroc
Make Positive Limited
Make Positive Software Solutions Private Limited
Anana Limited
Sabio Africa (Pty) Limited
CX Innovation Africa Proprietary Limited
Dvelp Limited
Sabio Denmark ApS
Flex Answer Solutions Pte Ltd
Sabio Europe Holdings SL
Sabio Germany GmbH
Sabio B.V.
Sabio Italy srl
Sabio Iberica SAU
Callware Mexico S.A. de CV
Sabio Solutions (Malaysia) Sdn Bhd
Bright UK Limited
Sabio Soutions (Singapore) Pte Ltd