

Updated Robocall Mitigation Plan

Grifinum is a global telecommunications provider focusing mainly on voice service, A2P messaging and conversational AI development. We build our business primarily on a professional approach, long-term experience, innovative technology and full dedication to our customers.

Our major customers are Tier1s, large enterprises, global carriers, SMS aggregators, MVNOs but also smaller local retailers and niche providers. We are present in all important worldwide markets, but our main focus is hard-to-reach destinations and emerging regions. We rely on the latest state-of-the-art technology, cooperating with leading providers and vendors. That enables us customer-oriented approach and flexibility to offer really tailor-made solutions focused on maximum effectiveness. In our business "customer first" is not only the usual quote but the real aim and goal of our effort.

We understand the importance of fighting against unlawful outbound calls and we fully support FCC's program or Robocall Mitigation.

For the protection of Grifinum's services, customers & vendors and to mitigate fraudulent traffic including but not limited to unsolicited calls, robocalls, spam calls, one-ring calls, Grifinum applies following updates on the Robocall Mitigation Plan:

1) Cooperation

Grifinum in its role as an international voice transit carrier, commits to respond to traceback requests from the Federal Communications Commission, law enforcement and the industry traceback consortium and to act in compliance with the National and EU legal and regulatory.

If, due to any:

- legal or regulatory reasons deriving from National and EU mandatory regulations which shall have a precedence over any other contractual or other commitment Grifinum has.
- Non-disclosure obligations deriving from specific agreements and not falling within the exemption of disclosure clauses.
- Record-deletion which has taken place after the minimum time of archiving as provided by National and EU regulations.

Moreover, in addition to the standard FCC Robocall Mitigation procedure, we do have our own internal statistics database in order to regularly check and evaluate all cases of reported, investigated or suspicious calls. We do actively communicate with our upstream providers and block those that do not comply or cooperate, or those that repeatedly breach market standards or FCC's procedures.

2) Active monitoring

We are negotiating an updated version of the active monitoring tool with our managed voice transit platform system provider. The goal of this tool is to better monitor, evaluate and block suspicious calls, maintain database of past issues and problematic A/B number combinations.

In addition to that, Grifinum's internally developed antifraud system actively monitors the voice traffic on 24/7/365 basis. It triggers alerts, identifies source of suspicious traffic and where the necessary criteria are met even automatically blocks the source. Also, the system actively monitors metrics to detect behaviour consistent with fraudulent traffic patterns to evaluate and improve existing controls and to continuously upgrade models for fraud detection.

3) KYC

Grifinum undertakes all possible efforts to understand the potential profile of immediate upstream customers up front as well as the legitimacy of the customer.

Such process includes activities in sales, product management and business operations

to better understand potential risk from receiving voice traffic from the specific end-users served by the customer.

Customers are required to provide all relevant legal data such as business name, business address, contact information and tax or other regulatory ID.

A legal review is done that includes a scan of international economic sanction databases for the potential customer and their signatories.

In addition, we have started to perform quarterly reviews of all existing customers – main goal is to analyze past behaviour, check cases of reported issues and take appropriate measures to limit the possibility of repeated failures. Based on this review we have already stopped cooperation with several customers who were not able to comply with requested rules and regulations.

We believe that by implementing these strategies, we can help to reduce the impact of robocalls on the overall business and improve customer satisfaction.
