



Talk It Pro LLC

**Policies and Procedures for Client Onboarding, Compliance Monitoring,
and Response to Traceback Requests**

Last revised: February 5, 2026

Introduction

Talk It Pro delivers a comprehensive, cloud-based communications platform designed to help businesses manage calls, messaging, and collaboration. It offers a full suite of advanced phone-system features—including time-based call routing, automated IVR menus, call queues, and unified communications.

Talk It Pro maintains a robust program to prevent illegal calls from originating on its network. The Federal Communications Commission defines “illegal calls” as calls that violate (i) the requirements of the Telephone Consumer Protection Act of 1991 (“TCPA”) or the Truth in Caller ID Act of 2009 (“TCIDA”); (ii) the related Commission regulations implementing the TCPA and TCIDA; (iii) the Federal Trade Commission’s Telemarketing Sales Rule; or (iv) any federal or state law or regulation that prohibits calls made for the purpose of defrauding a consumer.

Talk It Pro has fully implemented STIR/SHAKEN. It has obtained a STIR/SHAKEN certificate and authenticates calls originating from its platform.

Policy and Procedure for Client Onboarding

Policy

Talk It Pro utilizes the client review and onboarding process to ensure effective Know Your Customer outcomes, which includes:

1. Validating the identity of a potential customer seeking to use Talk It Pro’s services.
2. Determining if the potential customer presents a risk of initiating illegal robocalls using Talk It Pro’s system.
3. Requiring a Letter of Agreement prior to porting any telephone numbers to Talk It Pro’s underlying carriers.

Talk It Pro monitors all calls originating from its network, including monitoring calling traffic using a third-party call analytics platform, RRaptor. Specifically, all calls on the Talk It Pro network are monitored for:

1. Calls with missing caller IDs,
2. Multiple calls from the same caller ID, and
3. Call patterns that may indicate illegal calls.

Calls that do not pass screening can be blocked by Talk It Pro if deemed illegal robocalls. Talk It Pro actively monitors its customers’ calling practices to identify accounts for an Enhanced Due Diligence Audit, at Talk It Pro’s discretion.

Talk It Pro’s Terms and Conditions are incorporated in its Service Agreement and are a guide for our customers to understand the intended and permissible uses of our service, and to prevent exploitation, fraud, and abuse.

Procedure

Prior to activating a client's campaign, Talk It Pro requires the client to complete the Initial Client Due Diligence Questionnaire to confirm and verify their legitimacy.

Talk It Pro will review the completed Initial Client Due Diligence Questionnaire and take any additional steps as necessary to validate the company's identity and authenticity. Talk It Pro utilizes third party analytics, for business address verification, applicable state and/or federal business registration, and prior litigation history of the business or principal owners within the past 5 years.

Initial Client Due Diligence Questionnaire

Federal law requires those engaged in telemarketing to "Know Your Customer," which means that important information must be provided before using the Talk It Pro Services. The client is required to provide updates to any information within 30 days of any change.

In general, the information collected By Talk It Pro includes these categories:

1. Company name, address, entity type, its Federal Taxpayer Identification Number (EIN), state of formation, registration ID, website, social media sites, and DBAs.
2. The background of those key people involved in the business, including company owners.
3. How the company intends to use Talk It Pro services (business model).
4. A Written Do Not Call Policy.

Talk It Pro Services will not be provided to a customer until the Due Diligence Questionnaire is sufficiently completed and reviewed.

Post-Complaint Due Diligence Policy and Procedure

Policy

Talk It Pro will conduct additional due diligence on clients about whom Talk It Pro receives a complaint alleging illegal traffic from the Federal Communications Commission ("FCC"), Federal Trade Commission ("FTC"), other law enforcement agencies, or the Industry Traceback Group ("ITG").

Procedure

1. Complaints alleging illegal traffic shall be reviewed upon receipt.
2. Talk It Pro will determine the timeframe in which to respond to the complaint. If the required timeline cannot be met, we will contact the complainant with the timeline for response. If the complaint is an official written notice of illegal traffic from the FCC, FTC, other law enforcement or the Industry Traceback Group, Talk It Pro will respond to the notice within 24 hours.
3. Talk It Pro will conduct additional due diligence on the client/call about which the complaint relates.

4. Talk It Pro will regularly review Complaints to identify clients subject to a Talk It Pro's Enhanced Due Diligence Audit Procedure based on the company's complaint history.

Client Audit Policy and Procedure

Policy and Purpose

Talk It Pro offers a calling platform to its clients. As a matter of policy, Talk It Pro has policies and procedures in place to adhere to applicable laws, rules, and regulations, and requires its clients to do the same. If a client has been identified as presenting an elevated risk for noncompliance, which may likewise increase Talk It Pro's legal liability, additional post on-boarding client due diligence will be conducted. Because Talk It Pro wishes to ensure compliance and reduce risk, it enacts policies instituting an audit procedure for such clients.

For purposes of these policies a business or principal that pays for telephony service via stored-value cards (e.g. gift cards), cryptocurrency, or money-transfer businesses (e.g. Venmo®, Zelle®, Cash App®, PayPal®, Western Union®, etc.) or is blocked by another voice service provider's network after being determined by the FTC to carry bad traffic. Other indicators of a include: (a) using Talk It Pro's AI product or a non-AI product with an estimated or actual call volume in excess of fifteen million (15,000,000) calls per month and (b) which (i) has, based on Talk It Pro's research, a history of regulatory enforcement action with the Federal Trade Commission ("FTC"), Federal Communications Commission ("FCC"), or other regulatory body; (ii) sells products that are targeted towards seniors, individuals who speak English as a second language, or other vulnerable populations; (iii) sells vehicle service contracts, debt relief or foreclosure assistance, health supplements, home security, business opportunities, or products relating to the COVID-19 virus; or (iv) is an existing client and has been the subject of an unreasonable number of traceback requests and/or regulatory complaints relating to their use of the Talk It Pro Services, as determined by Talk It Pro in its sole discretion. Additionally, Talk It Pro may, in its sole discretion, designate a business or principal as a "High-Risk Client".

Enhanced Due Diligence Audit Procedure¹

Talk It Pro will conduct an audit of any High-Risk Client. The Audit includes:

1. Request proof of prior express written consent;
2. Review the FTC's Do-Not-Call Complaint file;
3. Search the FTC and FCC websites and perform a general Google and PACER search to identify new matters, whether lawsuits, regulatory actions, press releases, or otherwise, involving the High-Risk Client;
4. Review High-Risk Client scripts;
5. Review the names of at least two trade or bank references if using credit card or any form of payment other than bank wire transfer or ACH;

¹ Any deviation from these policies and procedures must be approved by Talk It Pro's CEO or Vice President of Operations.

6. Obtain an opinion from High-Risk Client's counsel that lead generation forms utilized by the High-Risk Client on Talk It Pro Services provide adequate prior express written consent;
7. Obtain an attestation from the High-Risk Client that the High-Risk Client is not subject to any active or pending investigations, lawsuits, or regulatory enforcement; and
8. Review and analyze all traceback requests pertaining to the High-Risk Client during the audit period and High-Risk Client's responsiveness to same.

All papers, documents, records, and logs used, obtained, or created by Talk It Pro for purposes of this audit will be maintained in a secure location for a period of one (1) year.

Talk It Pro may elect to request clients to reaffirm their commitment to compliance by executing an Agreement to Reaffirm Compliance Obligations and Duties. Use of the Agreement as a compliance mechanism is at the discretion of Talk It Pro senior leadership, but it will be considered when a client has been subject to the High-Risk Client Audit Procedures, requests atypical services or access to the Talk It Pro system, or has a prior history of regulatory enforcement.

Responding to Traceback Requests Policy

Policy

Talk It Pro will respond to all traceback requests from the Federal Communications Commission ("FCC"), Federal Trade Commission ("FTC"), and other law enforcement agencies as well as the Industry Traceback Group ("ITG") within twenty-four (24) hours of receiving notice of the request (or such other time frame specified by the requesting entity, if greater than twenty-four (24) hours), if possible. If it is not possible to respond within the designated time frame, Talk It Pro will communicate its timeline for response to the requesting entity. Talk It Pro will track Traceback Requests to identify clients subject to the High-Risk Client Audits.