

CHERRYROAD TECHNOLOGIES INC.

ROBOCALL MITIGATION PLAN

CherryRoad Technologies Inc. (“CherryRoad”) is a technology solutions provider, primarily for educational and government customers, that offers interconnected VoIP services to its subscribers on a resold basis using the services of GoTo Communications, Inc. (“GoTo”).

While CherryRoad necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by GoTo, CherryRoad has also adopted this robocall mitigation plan to take its own measures to limit the potential for the origination of unlawful robocalls by its customers that would be carried and processed by GoTo and other downstream providers.

Know-Your-Customer Policies

Subscriber Vetting: CherryRoad vets the identity of its customers when approving an application and entering into a contract for telephone service. Because CherryRoad specializes in comprehensive service packages tailored to the needs of its educational and governmental customers, becomes well aware of the nature and legitimacy of the customer’s business prior to providing service. As part of this vetting process, CherryRoad collects the customer’s legal name and address, physical location, and contact information. This information enables CherryRoad to validate the identity of potential customers prior to provisioning of service. CherryRoad will not provide service if a new customer’s identification cannot be verified.

Contractual Terms: CherryRoad’s Master Service Agreement (“MSA”) prohibits the use of CherryRoad service for any illegal purposes or in a manner that would constitute a criminal offense, give rise to civil liability or otherwise violate any applicable local, state, national or international law or regulation. CherryRoad may freeze or terminate customer’s service or take any other measures deemed to be appropriate if customer violates its MSA or any associated terms of service.

Use of Call Analytics to Identify and Block Unlawful Traffic

CherryRoad necessarily relies on GoTo’s use of call analytics systems to identify and block unlawful robocall traffic. If CherryRoad receives a report or alert from GoTo of suspected unlawful robocall traffic originated by a CherryRoad end user customer, CherryRoad will conduct an investigation. To the extent a customer is found to have violated its MSA or associated terms of service, CherryRoad will take action commensurate with the severity of the customer’s offense, including, but not limited to, providing the customer with a warning or terminating the customer’s service.

Knowledge of Upstream Providers

CherryRoad’s upstream provider, GoTo, is a well-known, reputable wholesale service provider that is registered in the FCC’s Robocall Mitigation Database. CherryRoad does not have access to information regarding the upstream providers from which GoTo receives traffic but

understands that GoTo is required to comply with FCC rules regarding “know-your-upstream provider” procedures to mitigate illegal robocalls.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

CherryRoad is committed to responding fully and within 24 hours to all traceback requests made by the Industry Traceback Group (“ITG”), law enforcement authorities, and government agencies to investigate and address suspected unlawful robocalls originated by CherryRoad customers, and will cooperate with GoTo on traceback requests.