



ADVENT TECHNOLOGIES, INC. ROBOCALL MITIGATION PLAN

THE COMPANY: TOP HAT COMMUNICATIONS, LLC.

Top Hat Communications, LLC. (the “Company”) is a Company based in California and is duly registered with the FCC and has the FRN/CORES ID of 0028829810 and the 499 filer ID issued by USAC of 833387.

The company is also registered with the California Public Utility Commission (CPUC) and has the requisite Utility Number from the CPUC in order to support business customers in the state of California.

The company is a small but going concern in California and specializes its business around the Managed Service Provider (MSP) model to small and medium-sized business customers. As an adjunct the Company offers solutions to business customers that support hosted telephony products for businesses which without limitation include Hosted voice solutions on a resold basis through Top Hat Communications underlying/upstream carriers.

The company is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocalls that it learns are using our service to originate calls or transit calls into the United States and territories.

The Company primary place of business is:

2324 Bethards Drive
Santa Rosa, CA 95405
707-547-3190
General email address:
Website: www.tophatcommunications.com

Leaders of the company are:

CEO:

Sondra Lampert
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707-303-1621
soni@klhconsulting.com

CFO:

Herbert Lampert
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Designated RMD Contact:

Edwin Lin
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Alternate RMD Contact:

Taylor Franco
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Santa Rosa, CA 95405
707-303-1631
tfranco@klhconsulting.com

STIR/SHAKEN COMPLIANCE

Through its underlying carriers the company is fully compliant with STIR/SHAKEN as a switchless reseller of resold voice Over Internet Propocol (“VoIP”) services to business customers. As a switchless reseller Top Hat Communications, LLC. does not own its own network or infrastructure of any kind and therefore has no access to any IP portion of any call and/or a SIP header of any call. Top Hat Communications is solely reliant upon its underlying carriers for call origination and all other attributes and characteristics related to VoIP calling which is made by the Top Hat Communications business customer.

PayG LLC dba SkySwitch

Arborcrest 1, 751 Arbor Way
Suite 150
Blue Bell, PA 19422
Phone: 747.777.8100
Email: support@skyswitch.comCoreDial LLC

CoreDial, LLC

Arborcrest 1, 751 Arbor Way
Suite 150
Blue Bell, PA 19422
Phone: 215.297.4400
Email: cdsupport@skyswitch.com

The Company (as a switchless reseller) by its underlying platform provider the company reserves the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or they are not authorized to use has occurred or is suspected.

The Company (as a switchless reseller) by its underlying platform provider is able to block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting the Company's networks.

TRACEBACK AND INQUIRY & RESPONSE

The Company commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. The Company shall cooperate with these groups to investigate and stop any illegal robocallers from using Company's service to carry or process illegal calls.

When notified by the FCC's Enforcement Bureau, Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless Company's investigation determines that the traffic is not illegal) when Company receives actual written notice of such traffic from the Enforcement Bureau.

If Company determines that the identified traffic is not illegal, Company shall provide the Enforcement Bureau with an explanation as to why Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

The company shall respond within 24 hours as stated in the FCC's most recent order to any duly appointed regulatory governing body (local, state and/or Federal or otherwise) which presents an inquiry to the Company.

The Company utilizes a combination of internal tools and third-party solutions to check for Do Not Originate (DNO) numbers. In addition, the Company utilizes a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes and unassigned number blocks.

KNOW YOUR CUSTOMER (KYC)

The Company also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.

The Company uses data systems for analytics and reviews to identify illegal robocalling in addition to a Know Your Customer (KYC) requirement to access the Company's networks. The process includes:

- Monitoring the network to identify suspicious traffic patterns.
- Limiting customers' capacity via call per second and/or concurrent session limits.
- Regularly checking call patterns for possible abusive traffic.

- All new customers are verified with a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and previous experiences with customer executives and employees. The Company severely limits the capabilities of new accounts until these appropriate processes are complete.

Additionally, due to the MSP based nature of the Company's business model the Company truly knows their customer. Not only in light of the above mentioned metrics but from the very start of a Customer relationship the Company establishes identification. From the intake and onboarding process of a Customer account to the relationship the Company builds with the Customer.

The Company also had a comprehensive Acceptable Use Policy related to robocalling, fraudulent calling patterns and High Volume Short Duration ("HVSD") calling. If a customer is found to have violated and/or possibly violated the Company policy, the Company has the right to halt, suspend, cease services to the customer immediately.

Top Hat Communications also has a strict Acceptable Use Policy in which it will terminate, halt, cease and/or suspend a business customers traffic (by the Top Hat underlying carrier) if the customer violates any of the company's acceptable use policies and violates any of the company guidelines related to robocalling, telemarketing or use of a customer service which supports it.

DECLARATORY STATEMENT BY COMPANY

The Company certifies that it has never been under investigation or committed any wording with any local, state, or Federal agency or equivalent as related to telemarketing or robocalling. And the company does not own its own network.