

## ROBOCALL MITIGATION PLAN

11<sup>th</sup> April 2024

VIP VoIP has implemented a set of commercial policies and technical solutions to prevent our customers from making automated sales calls using robot diallers.

1. When we respond to enquiries from potential customers, we verify the nature of their businesses. We refuse to supply telephone services who operate outbound sales call centres for third-party client companies. We do not want the reputational harm of facilitating nuisance calls of any kind, whether they are made by robots or real people.
2. We routinely monitor outbound call traffic from all our customers, and we automatically report customers who generate high volumes of short-duration calls. We define “high volume” as more than 60 calls per hour, and we define a “short duration” call as being less than 10 seconds.
3. For customers that are reported according to the above criteria, we contact them by phone and ask them to explain their call traffic. We also listen to a random selection of their call recordings to check that they are being made by humans, and to check the nature of the calls. If we find that the customer is using automatic software to generate calls which have a sales purpose, we immediately block their outgoing calls and we stop supplying the customer with telephone services.
4. We have a set of fraud protection tools which automatically block a customer’s outbound calls if our software detects suspicious activity. That would include a call profile of greater than 100 calls per hour, with a duration of less than 10 seconds each.