



Robocall Mitigation Plan

To whom it may concern

Saner Apps provides voice service in IP networks. We have taken reasonable steps as described here in this document on the calls originated in our network in order to mitigate unsolicited voice calls, robocalls and fraudulent calls.

Prevention of CallerID Spoofing: For outbound calls all of our customers must have a CallerID of a working and current Phone Number. Customer sent CallerID, if any, will get overwritten by the one in our system leaving no scope for spoofing. Most of the CallerID Numbers are issued to our customers by us and for those customers who want to bring their own CallerID, we enforce a very effective phone number verification with periodic re-verification which ensures the customer owns the number and has access to the inbound calls on that number. No anonymous calls are originated in our system.

Traceback requests: Saner Apps is committed to respond within 24 hours to all traceback requests made by the FCC, law enforcement, and the Industry Traceback Consortium, and to cooperate with these entities in investigating and stopping any illegal robocalls that use Saner App's services to originate calls.

Analysing high call volume customer call profiles: We run processes, at least once a day, that profiles and reports customers with high or inconsistent call volumes. These processes look for short-duration calls percentage, unanswered or unconnected calls percentage so that we can take action very quickly on customers with abnormal values.

Know Your Customer (KYC): Our customers must provide us with a government issued Photo ID and an address proof not older than 6 months. We check every business customer's business registration and ensure their business is current and is not a known bad actor. Our business customers are asked to name their main products and services and asked why they make calls. Every customer must provide us with their mobile phone number and we ensure it belongs to the customer. All purchases of our customers are through a payment gateway or through normal banking channels. No payments in form of cash are accepted.

One customer multiple identities: We have intelligence built into our system that helps in flagging customers with multiple identities. Our system immediately alerts us in instances like same IP address is used by multiple customers in a short of time. We also get alerted by our systems when the same mobile phone number is used by multiple customers.



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Customer Logs in from a foreign country: We get alerted when any customer logs in into their account from a country which is different from the country they registered with.

Stop serving non-complying customers: We continuously monitor usage of our system and as soon as we find any customer in violation of our service usage policies we immediately stop serving such customer as per our zero abuse tolerance policy.