

EvolveIP, LTD

ROBOCALL MITIGATION PLAN

EvolveIP, LTD (“Company”) is a voice service provider dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. EvolveIP, LTD has adopted this plan to mitigate potential robocalls and in accordance with 47 C.F.R. § 64.6305. EvolveIP, LTD will update its FCC RMD filing (including this plan) within ten (10) business days of any material changes in the information required by 47 C.F.R. § 64.6305. EvolveIP, LTD is (1) a voice service provider that provides service to its U.S. customers by reselling the voice over internet protocol services of its affiliate, EvolveIP, LLC and (2) is a foreign voice service provider that provides voice services to enterprise customers in the United Kingdom that enable its U.K. customers to terminate voice calls in the United States and other countries. Where there is a difference with respect to EvolveIP, LTD’s U.S. operations and U.K. operations, separate information is provided for both.

STIR/SHAKEN Implementation Obligation and Status

U.S. Operations: As a VoIP reseller, EvolveIP, LTD is a voice service provider without a STIR/SHAKEN implementation obligation. EvolveIP, LTD does not have an OCN and therefore is unable to obtain a Service Provider Code (SPC) token under the Governance Authority’s revised SPC Token Access Policy. Further, EvolveIP, LTD lacks control over the network infrastructure to implement STIR/SHAKEN. Accordingly, under 47 C.F.R. § 64.6304(b), EvolveIP, LTD is exempt from implementing STIR/SHAKEN with respect to its U.S. operations at this time.

U.K. Operations: EvolveIP, LTD is a foreign voice service provider that does not have a STIR/SHAKEN implementation obligation. All of EvolveIP, LTD’s traffic originating in the U.K. is originated using non-U.S.-based facilities. Further, EvolveIP, LTD is unable to obtain Service Provider Code token(s) under the Governance Authority’s revised SPC Token Access Policy.

Subscriber Vetting

EvolveIP, LTD conducts reasonable due diligence on new and renewing customers to prevent them from using EvolveIP, LTD services to originate illegal voice traffic. EvolveIP, LTD vets the identity of its contracted customers prior to onboarding by collecting their name, address, telephone number, email address, and running a credit check on them. For commercial customers, other relevant information such as their U.S. taxpayer identification, VAT or Companies House ID, principal place of business, contact person, and state or country of incorporation. Customers are enlisted onto Credit Safe which will alert EvolveIP, LTD of changes in credit worthiness, address, or other directorship changes.

Upstream Provider Vetting

EvolveIP, LTD vets the identities of upstream providers prior to accepting their traffic.

U.S. Operations: Company resells the VoIP services of its affiliate, EvolveIP, LLC. Company has confirmed that EvolveIP, LLC is listed in the Robocall Mitigation Database (RMD0001756).

U.K. Operations: EvolveIP, LTD's policy is to not serve as an intermediate provider to deliver traffic to the U.S. or to a U.S. service provider unless it is able to verify the upstream provider's identity as a legitimate business. Before accepting traffic from an upstream provider, EvolveIP, LTD obtains information on the provider's name (including d/b/a), physical address, contact person, state or country of incorporation, the nature of their business, and whether the upstream provider is identified in the FCC's Robocall Mitigation Database. If the upstream provider is not in the Robocall Mitigation Database, EvolveIP, LTD will not deliver traffic to the U.S. or a U.S. service provider. Additionally, EvolveIP, LTD monitors incoming traffic from upstream providers for signs of potentially illegal robocalls.

Terms of Service/Acceptable Use Policy and Other Mitigation Measures

EvolveIP, LTD uses call analytics tools to identify and block illegal traffic by using both internally prepared reporting and with the assistance of third-party software provided by Transnexus and Equinox Protector. In addition, EvolveIP, LTD formally addresses illegal use of any portion of EvolveIP, LTD services in our acceptable use policy, which is publicly available.

Cooperation with the Traceback Group, Law Enforcement and Government Agencies

Subject to the limitations of applicable law in its operating jurisdictions, EvolveIP, LTD commits to respond fully, within 24 hours, to valid requests made by the Industry Traceback Group (ITG), U.S. law enforcement authorities, and U.S. government agencies (including the FCC), and to cooperate with such entities to investigate and address suspected unlawful robocalls originated, or passed to EvolveIP, LTD, by EvolveIP, LTD's customers.

Formal Investigations

At no time in the prior two years has EvolveIP, LTD (or any entity with which it shares common ownership, management, directors or control) been the subject of a formal FCC, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to EvolveIP transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

Ownership and Management

EvolveIP, LTD is owned by EvolveIP, LLC having FRN number 0016401408. EvolveIP, LLC is ultimately owned by Xtium, Inc.

The principals exercising management control of EvolveIP, LTD are:

Mike Pisterzi, Director

Ron Zampolin, Director

The following entities are the parents, affiliates and subsidiaries of EvolveIP, LTD:

- Xtium Holdings, Inc.
- Xtium, Inc.
- Shoregroup Holdings, Inc
- Optanix Holdings, Inc
- Xtium EIP, Inc
- EIP Holdco, Inc (DE)
- EvolveIP Holdings, LLC
- EvolveIP Israel Ltd.
- MTEL B.V
- MTEL gmbH
- EvolveIP, LLC
- TVF Cloud, Inc
- ATSG India Private Limited
- XTium Holdings, LTD.
- dinCloud, Inc.
- dinCloud Holdings, LLC
- dinCloud, LLC
- dinCloud Pakistan (Private) Limited
- Xentaurs, LLC
- Vology Inc.

Version: March 2, 2026