

Robocall Mitigation Plan

The following policies apply to all customers and/or prospective customers of Xintong Wangying and comprise our Robocall Mitigation Plan to avoid originating illegal robocall traffic from our network:

1. **CONTRACT REQUIREMENT:** Our agreements clearly prohibit passing illegal robocalls through any of our switches or networks and define precise requirements for ASR, LCD and other traffic statistics. Customers who violate these rules are subject to immediate termination without notification. If Xintong Wangying believes illegal traffic has been passed through its network, the customer sending such traffic forfeits confidentiality and all data will be shared with industry partners and law enforcement as required by regulatory bodies.
2. **CUSTOMER DISCLOSURES AND CONFIRMATION:** All customers are required to disclose certain information about their business such as physical location, contact personnel, state/country of incorporation or business formation. They must also disclose the practices and nature of their business. We endeavor to know the precise type of traffic which originates from each customer's switch including the type of customers they acquire and exact type of services they provide. Xintong Wangying investigates each Customer's claims to verify accuracy before accepting them as a customer.
3. **MONITORING AND TRACEBACK:** Xintong Wangying monitors its system diligently and will investigate any suspicious traffic. We act promptly when we detect traffic which appears to be robocall activity to ensure it has been preauthorized as "legal" (i.e. authorized political, non-profit, reverse 911 or fully-opted-in traffic). In the event Xintong Wangying receives a Traceback request for an illegal robocall, we act on it immediately, request a specific and detailed explanation from our customer(s) and insist on immediate corrective action. We timely respond to all Traceback request from authorities. If corrective action is not timely provided by our customer, Xintong Wangying takes whatever action is necessary to prevent recurrence of the event(s).