

Unsolicited calls, Fraudulent calls and Robocall Mitigation Plan

1. Introduction

MoreMins implements measures to mitigate unsolicited calls, robocalls and fraudulent calls (the "Mitigation Plan"). This Mitigation Plan specifies the actions required to avoid, identify and respond to such calls and to any measures concerning them taken by MoreMins.

Unsolicited calls, robocalls and fraudulent calls represent a serious threat to the telecommunication industry and its customers. MoreMins analyzes and evaluates the risks facing the company and its business environment. Consequently, clear policies and procedures for overall prevention of service abuse framework have been defined.

2. Design of services

MoreMins services are designed to automatically meet caller id verification requirements. To make a call, the customer has to verify his/her personal phone number or purchase a phone number from MoreMins. MoreMins performs the necessary KYC procedures and identifies the customer in accordance with the applicable regulation.

Telecommunication systems authenticate and verify caller identification information for all SIP calls that originates or is received on MoreMins network.

3. Prevention and management of service abuse

The aim of this plan is to ensure that MoreMins is adequately equipped to protect its customers, brand, reputation and public interest from suspected or actual cases of service abuse or fraud. Management of unsolicited, robocalls or fraudulent calls mitigation plan consists of:

Proactive management

- a. "Know Your customer" (KYC) procedures.
- b. Constant high risk account monitoring.
- c. New user verification and due diligence process.
- d. Contract administration.
- e. Constant call flows monitoring of abnormal irregular activity.

Reactive management

- f. Cooperation with the reporting entities, participation in a traceback procedures.
- g. Customer account activity audit.
- h. Enforcement of the contract.
- i. Corrective actions.