

NS Innovations LLC

Robocall Mitigation Plan

Updated February 17, 2026

1) PURPOSE AND SCOPE:

This Robocall Mitigation Plan (“Plan”) describes the policies and procedures used by NS Innovations LLC to (i) prevent and respond to illegal robocalling and other unlawful or abusive calling activities, (ii) conduct Know Your Customer (“KYC”) due diligence before onboarding customers, (iii) conduct Know Your Upstream Provider (“KYUP”) due diligence as applicable to upstream connectivity and inbound traffic acceptance, (iv) monitor for indicators of illegal robocall activity, and (v) cooperate with traceback and enforcement requests.

All voice traffic that originates on NS Innovations LLC’s network is subject to this Plan.

2) PROVIDER ROLE:

NS Innovations LLC provides voice services and originates voice traffic on its network. It relies on wholesale provider(s) for call termination and numbering resources, and receives inbound call traffic for termination to end users on its network.

3) STIR/SHAKEN STATUS:

The voice traffic that originates on its network is currently authenticated with STIR/SHAKEN by its wholesale providers a) to which it sends 100% of its calls for termination, b) from which it receives 100% of its DID phone numbers using resources from the North American Numbering Plan and c) from which it receives 100% of its calls to be terminated on its network. NS Innovations LLC has confirmed that its wholesale providers have fully implemented the STIR/SHAKEN framework.

4) ROBOCALL MITIGATION PLAN

a) Robocall mitigation controls (operational commitments)

- i) Using the questionnaire and onboarding procedures attached, NS Innovations LLC screens all applicants for its services to determine if they are intending to use such services for autodialing from a database of numbers for purposes of telemarketing without having received written permission from the called parties. Calls to wireline numbers for purposes of political campaigning, market research or polling are deemed legal.
- ii) Blocking/termination of service: NS Innovations LLC will block services to a customer if it determines the customer is using services for illegal robocalling.

b) KYC (Know Your Customer)

NS Innovations LLC requires each customer to complete the Robocall Mitigation and KYC Questionnaire (Appendix A) and completes the KYC onboarding checklist (Appendix B). These materials are maintained in the customer file. If any Screening Results responses are “No,” the customer will be rejected pending senior management review after issues are satisfactorily resolved.,

c) KYUP (Know Your Upstream Provider)

- i) Inbound traffic acceptance limitation: NS Innovations LLC will only accept traffic for termination from companies that are listed in the FCC Robocall Mitigation Database (RMD) after September 28, 2021.
- ii) Wholesale/reseller upstream diligence (as applicable): For customers that are wholesale providers/resellers, NS Innovations LLC requires the representations and ongoing notification obligations in Appendix A, Section B, and performs the related verification steps in Appendix B (including review of the customer’s robocall mitigation plan on file with the FCC, where applicable).

d) Traffic Monitoring, Analytics and Enforcement

- i) Current monitoring tools: NS Innovations LLC uses no analytic systems, software, or third-party vendors at this time to identify and block illegal robocall traffic.
- ii) Enforcement action: If illegal robocalling is identified through complaints, traceback notices, internal review, or other credible information, NS Innovations LLC will take corrective action up to and including blocking traffic and terminating service.

5) TRACEBACK COOPERATION AND PLAN GOVERNANCE

NS Innovations LLC commits to respond within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers from using its services to originate calls.

APPENDIX B

ROBOCALL MITIGATION AND KNOW YOUR CUSTOMER QUESTIONNAIRE

NS Innovations LLC is committed to compliance with the Telephone Customer Protection Act (TCPA), the TRACED Act (Telephone Robocall Abuse Criminal Enforcement and Deterrence) and the rules of the Federal Communications Commission pertaining to the prevention of illegal robocalling, fraudulent calling and other illegal use of its network. To that end, NS Innovations LLC requires each customer to complete the following questionnaire to enable NS Innovations LLC to properly conduct the necessary due diligence to comply with the law and protect its network.

For purposes of this form, the “Customer” is the entity subscribing to services from NS Innovations LLC.

SECTION A

Question	Response
If Customer is an entity, what type of entity (corporation, LLC, etc.):	
Customer name, including all trade names, fictitious names and DBAs under which Customer has transacted business for the previous three years:	
State or country of formation:	
Federal taxpayer identification number (EIN) for US domestic entities:	
499 filer identification number for US entities:	
Business license or registration number and the name of the government entity that administers such registration or license:	
A description of Customer’s business, including whether	

Customer uses an auto-dialer or engages in telemarketing:	
Physical address of Customer's business:	
Name, physical address, email address and telephone number of the person responsible for payment of Customer's account with NS Innovations LLC and the form of payment to be used:	
Name, physical address, email address and telephone number of the natural persons who directly or indirectly own the Customer:	
Name, telephone number and email address of Customer's employee responsible for compliance with US state and federal laws pertaining to illegal robocalls:	
Websites and any social media pages used by Customer currently and over the past three years (leave blank if none):	
Customer's current IP addresses and any IP addresses used by Customer over the past three years:	

Has Customer (or its owners or controlling persons) have ever had an adverse judgment against it in a civil lawsuit relating to illegal robocalling? ☐ Yes ☐ No

Is Customer a wholesale provider (reselling NS Innovations LLC's services to other carriers or to end users)? ☐ Yes ☐ No

SECTION B

If Customer is a wholesale provider, by signing below, Customer represents and warrants to NS Innovations LLC, and agrees to the following. If Customer is not a wholesale provider and is not

reselling the services of NS Innovations LLC but instead will use them for its own account, this section does not apply:

- Customer has not been determined by USTelecom's Industry Traceback Group to be a "Non-Cooperative Voice Service Provider."
- Customer has not been blocked from another voice service provider's network after being determined to have violated laws or regulations pertaining to illegal robocalling, fraudulent calling, illegal telemarketing practices or otherwise has been determined to be a "bad-actor upstream voice service provider."
- Customer has implemented the STIR/SHAKEN Authentication Framework and/or registered in the Robocall Mitigation Database.
- Customer agrees to notify NS Innovations LLC within 24 hours (i) if Customer is determined by USTelecom's Industry Traceback Group to be a "Non-Cooperative Voice Service Provider" or has been blocked from another voice service provider's network after being determined to have violated laws or regulations pertaining to illegal robocalling, fraudulent calling, illegal telemarketing practices or otherwise has been determined to be a "bad-actor upstream voice service provider," or (ii) if Customer, or its owners or controlling persons, are subject to an adverse judgment in a civil lawsuit relating to the transiting of illegal robocalls.
- Customer agrees, upon NS Innovations LLC's request, to promptly provide NS Innovations LLC with the identity of a customer or end user of Customer that was the source of reportedly illegal call traffic Customer routed to NS Innovations LLC.
- Customer will screen existing customers and end users using questions substantially similar to those set forth in Sections A and B of this Questionnaire.
- For any customer or end user of Customer that indicates to Customer that it is either foreign or engaged in telemarketing, and that it originates or otherwise transits autodialed call traffic and/or intends to do the same as a customer, Customer shall not route to NS Innovations LLC any such call traffic from such customer or end user until Customer notifies NS Innovations LLC and takes reasonable steps to screen the legitimacy of the proposed autodialed call traffic, including, without limitation, obtaining, verifying and providing to NS Innovations LLC the following:
 - a. the name, point of contact and contact information for the entity on whose behalf the originating caller is proposing to make the autodialed calls;
 - b. a description and sample recording or transcript (in English) of the proposed autodialed calls;
 - c. a list of the proposed ANIs to be autodialed;
 - d. the originating caller's subscription number to the Federal Do-Not-Call Database;
 - e. a statement as to whether the originating caller would be undertaking the proposed calls with the consent of the proposed autodialed call recipients and, if so, a description and sample evidence of how such consent was obtained;
 - f. the proposed calls per second for the relevant autodialed call campaign;
 - g. the proposed dates of the relevant autodialed call campaign.

The undersigned is an officer of Customer with authority to execute this questionnaire and bind Customer to the provisions herein and further certifies that the information set forth above is complete and accurate the knowledge of the undersigned after reasonable inquiry.

Customer Name:

Signed by (print name):

Title:

Date:

APPENDIX B
ROBOCALL MITIGATION AND
KNOW YOUR CUSTOMER ONBOARDING CHECKLIST

Customer Name: _____

Wholesale: ☐ Yes ☐ No

Due Diligence

- ☐ Robocall Mitigation and Know Your Customer Questionnaire Received
- ☐ Customer contacted by telephone to confirm its service description and accuracy of information provided
- ☐ Customer website and social media pages reviewed (if any)
- ☐ Unless Customer is an individual, Customer name search conducted in state of formation to verify active status
- ☐ Internet search conducted using Customer name and names of all owners
- ☐ Court records search conducted in state of formation (if available) using Customer name and names of all owners
- ☐ Identified IP address location and it is not foreign for the Customer
- ☐ If a wholesale customer, reviewed Customer's Robocall Mitigation Plan on file with the FCC
- ☐ Conducted 499 filer ID search using Customer's name

Screening Results

Customer has provided all material information and documentation requested.

☐ Yes ☐ No

All information reviewed is correct as reported by Customer.

☐ Yes ☐ No

If Customer is an entity, Customer is registered as a business with the state or country of its principal place of business.

☐ Yes ☐ No

Customer has an EIN (if a domestic US entity), a website and an employee responsible for legal compliance prohibiting illegal robocalling or compliance policies pertaining to robocalling.

☐ Yes ☐ No

There are no irregularities or contradictory information in Customer's public filings.

☐ Yes ☐ No

No adverse judgment against Customer or its owners or controlling persons was reported or found arising out of a civil lawsuit relating to the transiting of illegal robocalls.

☐ Yes ☐ No

For wholesale customers:

Customer has not been the subject of, or calls dialed, originated, transmitted, or routed by Customer have not been the subject of, a total of three or more traceback requests or upstream or downstream line carrier complaints sent to or shared with Customer during any 60 day period; provided, however, that tracebacks and/or complaints regarding the same call or same call campaign on the same day are not treated as separate tracebacks.

☐ Yes ☐ No

Customer has not been determined by USTelecom to be a "Non-Cooperative Voice Service Provider" nor been blocked from another voice service provider's network after being determined to have violated laws or regulations pertaining to illegal robocalling, fraudulent calling, illegal telemarketing practices nor

otherwise has been determined to be a “bad-actor upstream voice service provider.”

☐ Yes ☐ No

Customer has implemented the STIR/SHAKEN Authentication Framework, if required, or filed with the Robocall Mitigation Database.

☐ Yes ☐ No

If foreign, Customer has an email address at the same domain name as its website, and/or pays for services by either bank ACH transfer, wire transfer or credit card.

☐ Yes ☐ No

Completed this ____ day of _____.

By: _____

Name: _____

This checklist must be scanned and saved in the Customer file along with Customer’s responses to the Robocall Mitigation and Know Your Customer Questionnaire. If any responses in the Screening Results are NO, Customer will be rejected pending review and approval by senior management after satisfactorily resolving any issues flagged by the Screening Results.