

Zetexa Global Corporation
Robocall Mitigation Plan

Zetexa Global Corporation
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Introduction

This document details the reasonable steps and actions taken by Zetexa Global Corporation (“Zetexa Global”) to mitigate and eliminate illegal robocalling. Zetexa Global has an ongoing commitment to scan for and help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and working with other providers and regulatory agencies in combatting fraudulent voice activity.

Zetexa Global provides wholesale Voice-over-Internet Protocol (“VoIP”) calling service. All telecom services are provided on a resale-only basis. As a telecom reseller, Zetexa Global is dependent on our underlying provider’s assistance with monitoring their networks for fraudulent voice calling patterns. Our underlying VoIP provider is Telinta, Inc.

Knowledge of Underlying Provider

Zetexa Global executed a Master Service Agreement with Telinta and has received written assurances from their officials that it will abide by the FCC’s STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to Zetexa Global. Zetexa Global and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Knowledge of Customers

Due diligence is performed to understand potential customer business models and the potential, or lack thereof, for involvement in fraudulent robocalling schemes. All Retail subscribers can register for services by providing valid Identity Proof and will provide address, email, and alternate contact number to avail the services. All Wholesale Subscribers require a physical business address that passes USPS validation. We require a contact person and a credit check for the business.

In our research of the prospect, Zetexa Global will not activate clients that provide anonymous information or where data mismatches are found. Additionally, prospects are required to agree to Zetexa Global’s strict policies and contractual terms as defined in our Master Services Agreement prohibiting the act of fraudulent voice activity as a condition of doing business with Zetexa Global. Our prospective customer shall be responsible for, and agrees to comply with, all laws, statutes, ordinances, and/or regulations applicable to prospective customers’ business and their use of Zetexa Global services.

Individuals associated with prospects or current customers who have been known to act improperly or otherwise be involved in fraudulent robocalling will cause their companies to be

rejected by Zetexa Global as a customer and any existing customer relationships could potentially be severed.

Traceback Requests

Zetexa Global is committed and will respond fully within 24 hours to all Traceback Requests from the FCC, law enforcement agencies, and the industry traceback consortium and vows to cooperate with these agencies in investigating and stopping any illegal robocallers that use our service to make calls. Zetexa Global has established a specific email address for traceback that is directed to all members of the Voice Assurance Team. The on-call member of the team will respond to the request to investigate call detail records as detailed in the request to determine if the traffic originates from non-owned numbers. Our point of contact to handle all traceback requests is:

Zetexa Global Customer Support

Sunil Reddy - +91-9739732387

If a traceback exposes an existing customer as the source of fraudulent robocalls, or as having transmitted fraudulent robocalls, a demand for an explanation and verification of mitigation of the traffic is issued to the customer. If the fraudulent traffic is not remediated, Zetexa Global immediately begins rejecting all traffic from the offending customer.

Telephone Numbers

A Telephone Number (“TN”) based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by Zetexa Global and/or obtained by Zetexa Global from Zetexa Global’s underlying carrier for use by the subscriber. Numbers can also be allocated by Zetexa Global or ported using information from previous bill matching customer information. The Company requires the customer to sign an attestation that they have the right to use the telephone number. It is mandatory that the end user provide valid Identity proof like passport. We will be using third party services to validate IDs.

For subscribers with multi-line telephone systems, Zetexa Global and our underlying provider allow calls to be connected. This screening capability enables an automated and secure method of validating originating telephone numbers.

International Calling

Zetexa Global is not currently an international voice services provider. If at any time Zetexa Global does decide to sell our services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full vetting of such

customers and work with our underlying provider to perform the necessary telephone number validation on all international originated calls.

Call Analytics

As a reseller, Zetexa Global must rely on our underlying provider and/or their third-party vendors to determine if originating calls should be blocked based on call analytics practices. In our efforts, Zetexa Global does monitor for calls to be sourced only from known locations and known DID's/TN's.

Ongoing Robocall Mitigation

The company is working with established DID and SIP trunk providers like DIDWW Ireland Limited, to check illegal traffic. We will check for steps like Frequent calls from same numbers, too many short duration calls, Robotic Voice detection etc.

- Immediate Notification of Suspicious Activity. Alerts would be configured to notify administrators in real-time whenever suspicious activity is detected, such as unusual call patterns, too many simultaneous calls, suspicious destinations, and so on. This immediate notification allows for prompt action to mitigate potential threats.
- Unusual Call Activity. Alerts can monitor call logs for unusual patterns, such as a sudden increase in international calls, calls to high-cost destinations, or a high volume of calls from a single user. Such patterns could indicate toll fraud or unauthorized use of the system.
- Threshold Alerts. Setting thresholds for various activities (e.g., number of calls per hour, price sum per hour) can help detect and prevent potential issues before they escalate into major security incidents.
- Regular Health Checks. Alerts can be used to schedule regular health checks of the system, ensuring that all components are functioning correctly and securely.

Zetexa Global monitors and examines call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. When we and/or our underlying provider detect network usage patterns consistent with illegal robocalls or suspect illegal robocalling is taking place, we will immediately seek to identify the party that is originating, terminating, or routing these calls so that we may take appropriate action. The actions taken may include, but are not limited to initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's corporate and/or d/b/a name; block the party's ability to

originate, terminate, or route calls on the network; and/or providing notice to law enforcement authorities.

As part of our Plan to mitigate and prevent any originating robocalls, we are committed to early identification and investigation of possible robocalling conditions. Among other things, we watch for higher-than-normal subscriber traffic volume, including large bursts of traffic in small timeframes or spikes in usage. We also monitor for originating calls of short duration and low call completion percentages.

Zetexa Global Contact for Robocall Mitigation-Related Issues

Please direct any questions related to Robocall Mitigation issues to:

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