

Unsolicited Calls, Fraudulent Calls, and Robocall Mitigation Plan

1. Introduction

The purpose of this plan is to outline CIUCTS's strategies and procedures for mitigating unsolicited, fraudulent, and robocalls. This plan aims to protect individuals and organizations from unwanted disruptions and potential fraud by implementing effective preventive measures and response actions.

2. Definitions

- **Unsolicited Calls:** Calls made without prior consent or an established business relationship.
- **Fraudulent Calls:** Calls intended to deceive or scam recipients into providing personal information, making payments, or engaging in other deceptive activities.
- **Robocalls:** Automated calls made using a prerecorded message or computer system, often used for marketing or scam purposes.

3. Objectives

The Compliance Department Manager and team are tasked with verifying customer accounts, authorizing service access, and overseeing account activity to ensure adherence to relevant laws and this plan. Meanwhile, the Technical Department Manager and staff are responsible for monitoring the system for any unusual activity.

- To reduce the volume of unsolicited and robocalls.
- To prevent individuals and organizations from falling victim to fraudulent calls.
- To implement responsive measures to handle and report unwanted calls effectively.

4. Prevention Strategies

4.1 Proactive Strategies

- **"Know Your Customer" (KYC) Procedures:** Implement thorough KYC processes to verify customer identities and assess risk profiles.
- **Continuous High-Risk Account Monitoring:** Regularly monitor accounts identified as high-risk to detect and address any suspicious activities promptly.
- **New User Verification and Due Diligence:** Conduct comprehensive verification and due diligence for new users to ensure they meet all regulatory and security standards.
- **Contract Administration:** Effectively manage and enforce contracts to ensure compliance with agreed terms and conditions.
- **Ongoing Monitoring of Call Flows:** Continuously review call flows to identify and investigate any irregular or abnormal activity.

4.2 Reactive Strategies

- **Collaboration with Reporting Entities:** Work closely with relevant reporting bodies and engage in trace-back procedures to address and resolve issues.
- **Customer Account Activity Audits:** Perform detailed audits of customer account activities to identify and rectify any discrepancies or issues.
- **Contract Enforcement:** Ensure strict adherence to contract terms and take necessary actions against breaches or non-compliance.
- **Implementation of Corrective Actions:** Develop and execute corrective measures to address identified issues and prevent recurrence.

5. Response Measures

5.1 Reporting Mechanisms

Set up a reporting system for individuals and employees to report unsolicited, fraudulent, or robocalls. Provide clear instructions on how to report these calls to appropriate authorities.

5.2 Incident Tracking

Maintain a log of reported calls, including details such as caller ID, time of call, and nature of the call. Analyze data to identify patterns and develop targeted mitigation strategies.

5.3 Verification Procedures

Establish procedures for verifying the legitimacy of calls received, especially when dealing with financial transactions or sensitive information. Advise individuals and employees to independently verify the identity of the caller before disclosing any personal information.