

iRingCentral MiCloud & Sky, LLC

Robocall Mitigation Plan

RingCentral MiCloud & Sky, LLC (“MiCloud”) ceased providing service on July 6, 2026, and completed the turn down of its network and infrastructure in August 2026. If MiCloud decides to start offering voice services in the future, it will implement this Robocall Mitigation Plan (“the Plan”).

Know Your Customer Procedures.

MiCloud is no longer onboarding new customers. MiCloud would require existing customers to provide and maintain accurate information, including legal name and contact details, and to update and verify this information as needed. As described below, MiCloud would continuously monitor its network for suspicious activity.

Know Your Upstream Provider Procedures

MiCloud would contract with respected upstream providers and would require those providers to offer service in compliance with all applicable laws and regulations, including but not limited to the laws and regulations related to robocalling.

MiCloud would only accept traffic from immediate upstream providers that are listed in the Robocall Mitigation Database and would not knowingly accept traffic from providers who are not listed in the Robocall Mitigation Database.

Customer Compliance with Robocalling Rules and Existing Law.

MiCloud would require end customers to use its services in compliance with the law and prohibit, among other things, illegal call spoofing, fraud, and use of automatic or predictive dialing without the called party’s prior consent.

Active Monitoring of Network for Fraud

MiCloud would monitor its network for suspicious calling patterns; promptly investigate any alerts related to illegal, abusive, or otherwise unacceptable behavior; and apply consistent processes and standards to any allegations of service abuse and act fairly and transparently toward our customers. After investigation, MiCloud would make a determination of the appropriate action, which may include denial of service, suspension of service, termination of service, and no action. MiCloud would be able to immediately impose its action upon customers without any delay.

Full and Timely Compliance with Traceback Requests

MiCloud would respond to traceback requests within 24 hours of receiving the request, as required by the Federal Communications Commission rules. MiCloud would require all resellers and upstream providers to comply with all traceback efforts, whether initiated by the

Federal Communications Commission, the designated Industry Traceback Group, law enforcement, or by any other applicable voice service provider or interested party.

When a traceback request is made or any other credible complaint brought to its attention, MiCloud would promptly investigate the suspect traffic to determine the call path(s) and whether the traffic is likely to be illegal robocalling. If the traffic is deemed highly likely to be illegal, MiCloud would take appropriate steps to ensure that the suspicious traffic does not continue, including terminating the caller's access to MiCloud's network.

STIR/SHAKEN Implementation.

MiCloud would implement STIR/SHAKEN on its IP-networks. Should MiCloud sign calls, it would sign the calls in accordance with relevant ATIS standards.

Affiliates

MiCloud is a wholly owned subsidiary of RingCentral, Inc. RingCentral, Inc. is a publicly traded corporation. Both Vlad Shumnis and Vlad Vendrow own more than 10% of RingCentral stock. In addition, Mr. Shumnis is RingCentral's Chief Executive Officer and manages and controls RingCentral's businesses.

RingCentral also wholly owns RCLEC, Inc. and Connect First, Inc. RingCentral, RCLEC, and Connect First are listed in the Robocall Mitigation Database and have published a Robocall Mitigation Plan.

Neither MiCloud, RingCentral, RCLEC, Connect First, Mr. Vendrow, nor Mr. Shumnis have been subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.