

ROBOCALL MITIGATION PLAN

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Avetium Consult Limited is a Business Technology and Business Process Outsourcing Company that is licensed by the Nigerian Communications Commission as a Value-Added (call center services) service provider.

The following policies apply to all customers and/or prospective customers of Avetium Consult Limited and comprise our Robocall Mitigation Plan to avoid originating illegal robocall traffic from our call center.

Avetium is a Foreign Voice Service provider based on the definition in §64.6301 (c) that implements call center solution for customers using our partner's (Hodusoft's "HoduCC") call center application to implement call center for our customers.

1. **CONTRACT REQUIREMENT:** Our contractual agreement with customers state that we use HoduCC call center which clearly prohibit passing illegal robocalls through any switches or networks used and define precise requirements for LCD, LCD The Likely Called Directory is a database or list of telephone numbers that are frequently or likely to be called by a particular user or from a specific telephone number. This concept is used in call analytics and robocall mitigation strategies and other traffic statistics. If AVETIUM believes illegal traffic has been passed through its network, the customer sending such traffic forfeits confidentiality and all data will be shared with industry partners and law enforcement as required by regulatory bodies.
2. **CUSTOMER DISCLOSURES AND CONFIRMATION:** All customers are required to disclose certain information about their business such as physical location, contact personnel, state/country of incorporation or business formation. They must also disclose the practices and nature of their business. We endeavor to know the precise type of traffic which originates from each customer's switch including the type of customers they acquire and exact type of services they provide. AVETIUM investigates each Customer's claims to verify accuracy before accepting them as a customer.

3. **MONITORING AND TRACEBACK:** AVETIUM monitors its system diligently and will investigate any suspicious traffic. We act promptly when we detect traffic which appears to be robocall activity to ensure it has been preauthorized as “legal” (i.e. authorized political, non-profit, or fully-opted-in traffic). In the event AVETIUM receives a Traceback request for an illegal robocall, we act on it immediately, request a specific and detailed explanation from our customer(s) and insist on immediate corrective action. We timely respond to all Traceback request from authorities. If corrective action is not timely provided by our customer, AVETIUM takes whatever action is necessary to prevent recurrence of the event(s).
4. **CONSUMER CONTROL SUITE: The Call Center Application (HoduCC)** through the report and analytics checks for details call analytics and call filtering.
5. **PUBLIC AWARENESS:** AVETIUM pro-actively notifies all customer using the number of such policy along with keeping a record of such notifications.
6. **FOREIGN SOURCES OF TRAFFIC:** AVETIUM has non-USA customer which service their own customers and traffic that originates from both USA and Non-USA sources. We take extra precautions relative to non-USA customers to ensure they meet all requirements of this Robocall Mitigation Plan. Prior to authorizing a foreign customer for calling privileges, we verify all information requested.
7. **CALL BLOCKING:** AVETIUM (based on customers requests) through the HoduCC Call Center Application can block all calls originating from numbers known to us to send illegal robocall traffic and/or calls destined to specific phone numbers as appropriate for robocall mitigation.
8. **Do NOT CALL:** HoduCC through the DNC (Do Not Call) list can prevent the calling of certain during a robocallThe Call Center Application through the DNC (Do Not Call) list can prevent the calling of certain numbers during a robocall. A DNC List class to manage the list of numbers that should not be called. The Call Center Application class

represents the calling system. It checks the DNC list before making a call.

9. **LAW ENFORCEMENT COOPERATION:** AVETIUM cooperates fully with investigative authorities, industry traceback groups, the FCC and the official consortium designated to lead private traceback efforts. We have personnels that handle all traceback requests and coordinate with outside investigations.



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