

CM.COM - ROBOCALL MITIGATION PLAN

Company: CM.com US Inc. (“**CM.com**”)

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Title of Signatory: President

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CM.com is an interconnected voice over internet protocol (“**VoIP**”) provider. CM.com offers VoIP to businesses (B2B).

CM.com has fully implemented STIR/SHAKEN, as included in CM.com’s filing in the Robocall Mitigation Database. In addition to the implementation of STIR/SHAKEN, CM.com has adopted this robocall mitigation plan to take measures to limit the potential for the originating, carrying, or processing of unlawful robocalls from or on its network. Outbound calls are signed with authenticated caller identity information.

All voice traffic that originates from or is carried or processed through our network is subject to the following robocall mitigation policies.

- CM.com has implemented a Know-Your Customer process under which it vets the identity of its VoIP customers as part of the negotiation and onboarding process.
- CM.com has implemented monitoring solutions for VoIP traffic originating from invalid numbers or unallocated numbers.
- CM.com has implemented a system to detect an unusually large number of calls from the same number or an excessive number of short duration calls.
- CM.com has implemented call analytics, such as STIR / SHAKEN, that detect call patterns that indicate robocalling.
- Indications of robocalling are subject to investigation, contacting our customer and, if required, blocking further traffic.
- CM.com’s Terms and Conditions contain the explicit prohibition to send any spam, unsolicited traffic, or other unethical, illegal, punishable, or otherwise fraudulent or illicit traffic. If CM.com determines that the customer is using CM.com for any of the above,

including Robocalling, CM.com may, depending on the severity of the customer's offence, including, but not limited to, providing the customer with a warning, suspending, terminating services immediately and/or reporting the misconduct to the appropriate authorities.

- CM.com requires customers operating under the Terms and Conditions to provide reasonable cooperation regarding information requests from law enforcements and regulatory bodies such as the FCC. CM.com is committed to collaborating fully in investigations to identify and terminate illegal robocalls using our VoIP services.

Robocall Mitigation Database

Designated contacts for Robocall Mitigation Issues:

Sándor Incze and/or Aard Kegge

CISO / Head of Legal

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