



Unsolicited calls, Fraudulent calls and Robocall Mitigation Plan

1 Scope

GVM implements measures to mitigate unsolicited calls, robocalls and fraudulent calls (the “Mitigation Plan”). The Mitigation Plan specifies the actions required to avoid, identify and respond to such calls and to any measures concerning them taken by GVM.

2 Introduction

Unsolicited calls, robocalls and fraudulent calls represent a serious threat to the telecommunication industry and its customers. GVM analyses and evaluates the risks facing the company and its business environment within the framework of GVM risk management system. Consequently, clear policies and procedures for overall prevention of service abuse framework have been defined.

3 Responsibilities

The Compliance Department Manager and staff are responsible for verifying Customer account, authorising access to services and monitoring account activity in conformity with the applicable laws and this plan.

Technical Department Manager and staff are responsible for system monitoring in search of any abnormal activity.

4 Prevention and management of service abuse

The aim of this plan is to ensure that GVM is adequately equipped to protect its customers, brand, reputation and public interest from suspected or actual cases of service abuse or fraud. Management of unsolicited, robocalls or fraudulent calls mitigation plan consists of:

4.1 Proactive management

- 4.1.1 “Know Your customer” (KYC) procedures.
- 4.1.2 Constant high risk account monitoring.
- 4.1.3 New user verification and due diligence process.
- 4.1.4 Contract administration.
- 4.1.5 Constant call flows monitoring of abnormal irregular activity.

4.2 Reactive management

- 4.2.1 Cooperation with the reporting entities, participation in a traceback procedures.
- 4.2.2 Customer account activity audit.
- 4.2.3 Enforcement of the contract.
- 4.2.4 Corrective actions.