



Robocall Mitigation Plan for Spinoco Czech Republic, a.s.

Spinoco is a provider of a software as a service solution for business customers across Europe and North America. Spinoco provides telecommunication solutions as part of the SaaS offering to a selected group of B2B customers only.

Spinoco is fully committed to mitigating robocalls on our network. The mitigation plan that is in place involves the following points:

1) Screening new customers (Know Your Customer procedure)

Prior to providing services to customers, Spinoco completes comprehensive due diligence to ensure they are legal entities and that their use cases for our services are valid. Spinoco only provides services to vetted business customers.

2) Monitoring and Detection

Traffic within the Spinoco network is monitored 24/7, and any unexpected traffic is detected and followed up on with the customer. In case of unauthorized or otherwise unexpected traffic, Spinoco has the right to block any traffic until the appropriate customer clarifies it. Our upstream providers have similar measures in place, further ensuring that any illegal and inappropriate activity is detected and addressed.

3) Collaboration only with partners who have STIR/SHAKEN implemented (Know Your Upstream Provider)

For services in the United States, Spinoco works solely with providers who fully meet the requirements for implementing STIR/SHAKEN and other specifications for mitigating Robocalls. Spinoco requires that all our upstream providers have a robocall mitigation plan in place, including identifying and reporting suspicious call traffic to us. This enables Spinoco to be fully compliant with the requirements of the Robocall mitigation.

4) Collaboration with authorities

Spinoco is committed to responding timely and efficiently to all traceback requests from the FCC, law enforcement, and the ITG. Spinoco will cooperate with all the above-mentioned entities in their investigations and provide the help required to stop illegal robocalls or other fraudulent use of the services.