

ROBOCALL MITIGATION PLAN

Effective date: February 28, 2025

Astrive X Ltd. (“the Company”) is a non-U.S.-based intermediate provider that processes voice traffic traversing its network; however, Astrive X Ltd. neither originates nor terminates this traffic.

Astrive X Ltd. passes unaltered to the subsequent intermediate provider or voice service provider in the call path any authenticated caller identification information for all calls it receives that utilize North American Numbering Plan (NANP) resources in the caller ID field and pertain to the United States.

To avoid carrying or processing illegal robocall traffic, Astrive X Ltd. has implemented the following measures:

- 1) The Company fully and promptly responds to all traceback requests received from the Federal Communications Commission (FCC), law enforcement agencies, and the industry traceback consortium concerning calls for which it acts as an intermediate provider and cooperates with these entities in investigating and preventing illegal robocalling activities
- 2) The Company has established robust Customer Due Diligence (CDD) and Know Your Customer (KYC) procedures for onboarding new customers and renewing agreements with existing ones. Astrive X Ltd. makes reasonable efforts to investigate the practices of upstream providers to mitigate the risk of illegal activities. The Company verifies the customer's address, requires the provision of accurate contact information, and analyzes the nature of the customer's business to ensure compliance with applicable regulations.
- 3) The Company accepts traffic from customers using NANP numbers pertaining to the United States in the caller ID field only if the customer's filing appears in the Robocall Mitigation Database and this filing has not been de-listed as a result of enforcement actions.
- 4) Astrive X Ltd. contractually requires its customers and vendors to cooperate in traceback investigations by identifying the upstream providers from which suspected illegal traffic originates. Additionally, contracts explicitly prohibit the use of the Company's services for carrying or processing illegal traffic, reserving the Company's right to terminate agreements where violations arise.
- 5) The Company monitors all incoming traffic for issues on an ongoing, proactive basis and uses analytics systems to identify and block illegal traffic, including robocalls.