

SHADELINE LTD

Robocall Mitigation Plan

The following policies apply to all customers and/or prospective customers of SHADELINE LTD and comprise our Robocall Mitigation Plan to prevent the origination of illegal robocall traffic through our network:

1. Contract Requirement

Our customer agreements explicitly prohibit the transmission of illegal robocalls over any part of SHADELINE LTD's telecommunications infrastructure. These agreements outline compliance obligations, including ASR, LCD, and other traffic standards. Any customer found in violation is subject to immediate termination without notice. Should SHADELINE LTD determine that illegal robocalls have been transmitted through our network, we will disclose all relevant data and cooperate fully with industry stakeholders and law enforcement agencies, as required by applicable regulations.

2. Customer Disclosures and Confirmation

Prior to provisioning service, SHADELINE LTD requires customers to provide full disclosure of business operations. This includes:

- Physical business address
- Names and roles of contact personnel
- State or country of incorporation
- Valid federal or international tax or business identification
- Full description of services offered

Customers must also disclose the types of calls they intend to originate and the methods used to ensure compliance with telecommunication regulations. SHADELINE LTD performs internal verification and risk assessment of each customer prior to activation.

3. Monitoring and Traceback

SHADELINE LTD employs active monitoring systems to identify anomalous traffic patterns that could indicate illegal robocalling activity. Upon detection of such traffic:

- We immediately investigate and verify the nature of the call traffic
- If traffic appears to violate our terms, we initiate a detailed Traceback request process

- We respond promptly to traceback requests from industry bodies or regulatory authorities
- Customers involved in illegal robocalls must provide clear explanations and implement corrective actions immediately

Failure to respond or correct the issue may result in account suspension or termination.

4. Publication and Notification

SHADELINE LTD publishes this Robocall Mitigation Plan on the public section of our corporate website. Any modifications to this policy will be communicated to customers proactively via email and/or through public notice to ensure transparency and up-to-date compliance information.

5. Foreign Sources of Traffic

SHADELINE LTD accepts foreign-originating traffic only under stringent conditions. All Non-USA customers must:

- Comply with every element of this Robocall Mitigation Plan
- Demonstrate proof of responsible call origination practices
- Pass additional screening before activation

We verify the identity, origin, and intent of foreign clients before allowing them access to our services.

6. Robocall Mitigation Database

In compliance with FCC guidelines, SHADELINE LTD mandates all wholesale customers to be registered with the official Robocall Mitigation Database as of August 28, 2021. Customers not appearing in this database will be denied access to our services until compliance is verified.

7. Call Blocking

SHADELINE LTD utilizes dynamic call-blocking tools to:

- Block all calls from numbers associated with illegal robocalls
- Prevent traffic from unverified or known problematic sources
- Protect the integrity of our network and the public

Calls that fail our authentication protocols will be automatically rejected.

8. Law Enforcement Cooperation

SHADELINE LTD maintains close coordination with federal enforcement agencies, industry traceback groups, and the Federal Communications Commission (FCC). A designated internal compliance officer is responsible for handling all traceback requests and coordinating outside investigations. SHADELINE LTD complies fully and expediently with all legally binding requests for call data or investigation support.

Contact Information for Compliance and Traceback Inquiries:

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