



B.C. 1303923, Ajman Free Zone C1 Building, Ajman Free Zone, 4442612247

ROBOCALL MITIGATION PLAN

Date: 24.02.2026.

1. Introduction

Fortress Advisory F.Z.E, reg.No. 31474, registered address: B.C. 1303923, Ajman Free Zone C1 Building, Ajman Free Zone, 4442612247 (the "Company") is an international intermediate provider of telecommunications services. The Company transmits voice traffic that traverses the public telephone network, however the Company does not originate or terminate calls within the United States.

Pursuant to 47 CFR § 64.6305 and related provisions, the Company hereby submits this Robocall Mitigation Plan, affirming its commitment to prevent the origination, transmission, or facilitation of illegal robocall traffic, and to comply with all applicable obligations under U.S. law.

3. Core Mitigation Measures

3.1. Traffic Monitoring and Fraud Detection. The Company operates a continuous and proactive traffic monitoring system, incorporating advanced analytics, artificial intelligence, and machine learning, identifies and flags high-risk call patterns indicative of Robocalls, Wangiri Fraud, PBX Hacking, International Revenue Share Fraud (IRSF), Artificially Generated Traffic and Spam or other unlawful call attempts. Suspicious traffic is subject to immediate investigation and, where warranted, blocked or suspended.

3.2. Traceback Cooperation. The Company fully and promptly complies with all traceback requests from the FCC, the Industry Traceback Group, and law enforcement authorities. Cooperation includes timely disclosure of upstream and downstream provider information and implementation of remedial measures.

3.3. Know Your Customer (KYC) and Due Diligence. Prior to initiating service, the Company implements mandatory KYC procedures for all customers. These procedures include verification of corporate registration, collection and authentication of customer contact information, evaluation of customer business operations and call practices, assessment of upstream providers' compliance posture. Customers demonstrating high risk or insufficient compliance measures are denied service.

3.4. Robocall Mitigation Database (RMD) Compliance. The Company allows traffic containing North American Numbering Plan ("NANP") numbers in the calling party number (caller ID) field only if the originating customer maintains an active registration in the FCC's Robocall Mitigation Database. Customers de-listed from the RMD, whether voluntarily or by enforcement action, are immediately suspended pending investigation.

3.5. Contractual Enforcement. All customer and vendor contracts expressly prohibit the use of Company services to transmit, process, or facilitate unlawful robocall traffic. Contracts include obligations requiring cooperation with traceback requests and investigation of suspected illegal traffic. Violations of contractual terms may result in immediate suspension or termination of service.

4. Enforcement and Escalation Protocol

Upon detection of suspicious activity, the Company initiates an internal investigation. Customers engaged in or suspected of illegal traffic are notified and required to provide evidence of compliance. If non-compliance is confirmed, services are suspended and, where necessary, terminated.

5. Ongoing Compliance

This Plan shall be updated periodically to reflect evolving regulatory requirements, industry best practices, and technological advancements.

6. Conclusion

The Company is committed to preventing the transmission of illegal robocalls and safeguarding the integrity of the United States communications ecosystem. Through proactive monitoring, diligent customer vetting, strict contractual controls, and full regulatory cooperation, the Company ensures compliance with Title 47 of the Code of Federal Regulations and the FCC's Robocall Mitigation requirements.

Zhanna Klusova

Director, Fortress Advisory F.Z.E