

Mbira Technologies Robocall Mitigation Strategy

Introduction

Mbira Technologies fulfills orders for music equipment retail website zZounds.com and other clients' retail websites in the musical instrument and pro audio gear sector. zZounds offers a financing option unique to the industry, an internal payment plan program based on the goal of providing musicians and pro audio consumers with the opportunity to pay for gear over time. The length of payment plans currently range from 4 months to 18 months, all with no interest charged to the customers. The majority of orders with zZounds (traditionally in the range of 65-90% depending on the year) use internal payment plans, instead of traditional orders with all funds charged upfront.

Of the zZounds internal financing payment plan orders, approximately 5-15% become delinquent over time. We are first-party collectors of the outstanding financing debts, and utilize various methods to contact customers to collect on overdue debt, including emails, physical letters, and calls from internal collections agents. Our internal collections agents call out to customers solely for the reason of account payment delinquency and collections customer contact, rather than cold calling.

The success of our internal collections efforts depends in part on our ability to reach customers regarding the debt, as a payment card may have expired, or funds may be available outside of a scheduled payment due date. All outbound calling from Mbira Technologies is currently done by live agents, rather than utilizing automated non-agent calls. While utilizing automated non-agent calls is a consideration for future collections strategies, we have no intention of using this type of call at this time.

Robocall Mitigation Strategy

Mbira Technologies actively monitors and records both inbound and outbound customer calls. Call traffic is analyzed for indicators of illegal robocall activities. In the unlikely event that illegal robocall activity occurs, Mbira Technologies would take steps to investigate and block this call traffic as soon as possible.

Internal collections calls from our agents are made solely to the billing party on the financed order, in order to comply with privacy regulations. To place a financed order with zZounds, the customer must agree to a formalized set of Terms and Conditions. These Terms and Conditions include language authorizing zZounds to contact the customer regarding unpaid installment payments via email, phone call, text message,

and physical mail. The Terms and Conditions document has been thoroughly vetted to ensure compliance with all legal requirements for debt collection.

Response to Traceback and Legal Requests

For any Traceback or Legal Requests received by Mbira Technologies, the legal department is committed to investigating and complying with these requests in a timely manner.

Plan Updates

As financing and retail regulations are continuously evolving, Mbira Technologies actively adapts to the requirements of any new regulations, and will update and submit any changes to the filing.