



TALON
FINANCIAL TECHNOLOGIES

December 19th, 2025

RE: Robocall Mitigation Program

Attn. FCC RMD Team,

The following details are in relation to Talon's Robocall Mitigation Program and the RMD form submission as they relate to our Shareholder Communication Services:

Filer Information

Legal Name: Talon Financial Technologies, Inc. (referred to herein as "Talon")

FRN: 0037758422

Address: 99 Wall Street, Suite 810, New York, NY 10005

Contact Name: Alex I. Zonis

Title: Chief Executive Officer

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Certification Type

Talon Robocall Mitigation Program.

Description of Robocall Mitigation Program

Talon provides Ringless Voicemail (RVM) services to clients for legitimate business outreach and notifications. In doing so, we utilize providers with compliant and stringent STIR/SHAKEN implementations.

Furthermore, while STIR/SHAKEN call authentication is not applicable for our service offerings, Talon has implemented a robust robocall mitigation program to prevent the origination of illegal robocalls.

Customer Vetting

All Talon clients are thoroughly vetted prior to being onboarded. This includes identity verification, business validation, and review of intended use cases to ensure compliance with federal regulations.

Contractual Obligations

Clients are required to sign a service agreement that prohibits the use of our platform for unlawful robocalls, spam, or fraudulent activity. Furthermore, all outreach campaigns are vetted and executed by Talon's own team. At no time, does any Talon client have direct access to our platforms.

Traffic Monitoring

Talon, as well as our providers, regularly monitor and review client campaign delivery patterns and behavior for unusual or potentially unlawful activity. Talon also reviews and submits regular reporting of any campaign to its clients. Any suspicious activity would result in an immediate investigation and potential service suspension.

Traceback Cooperation

Talon fully cooperates with all traceback requests initiated by the FCC, law enforcement, and the Industry Traceback Group (ITG).

Caller ID Practices

Although ringless voicemails do not transmit a caller ID in the traditional sense, we ensure that any associated messaging clearly identifies the sender (our client) in a truthful and non-misleading manner.

Use Case

Talon provides Shareholder Communication Services on behalf of its clients (transfer agents, corporate governance and law firms, proxy advisory firms, etc.). Our notifications inform verified shareholders of important updates such as proxy notifications, annual meeting reminders, voting instructions, BoD changes, M&A activity, material availability notices, and the such.

Messages are strictly transactional and/or informational, and are sent only to shareholders having pre-existing share ownership positions and relationships with the issuer. There are no promotional or marketing messages of any kind.

Use Case Description

- **Messaging Type:** Transactional, Informational (Non-Marketing, Non-advertisement)
- **Opt-In Method:** Shareholders are Opt-In by virtue of their share purchase agreements, share ownership, and resulting established shareholder relationship with the issuer (company or fund). Shareholder contact data is provided by the client.
- **Opt-Out Method:** Opt-Out features for every message type are as follows:
 - RVM - A Call-in Request via Client's CSR
 - SMS - A "STOP" reply via SMS
 - E-mail - A link at the bottom of the E-mail

Compliance Contact

Contact Name: Alex I. Zonis
Title: Chief Executive Officer
Phone: 212-812-1500, ext. 100

If you have any questions, please do not hesitate to contact me.

Sincerely,



Alex I. Zonis
Chief Executive Officer

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