



VORADIAN ROBOCALL MITIGATION PLAN

February 23, 2026

Since the passage of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act, the Federal Communications Commission (“FCC”) has adopted a series of new rules to combat illegal robocalling traffic. As a Voice Service Provider, VORADIAN, INC. is subject to the rules adopted by FCC to combat illegal robocalling originating within its network by its end-user customers, and therefore, submits this Robocall Mitigation Plan (“Plan”) as required by 47 CFR §64.6305, et al.

VORADIAN, INC. (“Voradian”) is committed to minimizing the number of robocalls that originate on its network and preventing unwanted robocalls from reaching Voradian end-users. To this end, Voradian has adopted and implemented a Robocall Mitigation Plan to outline a number of reasonable and affirmative steps it has undertaken in its roles as a voice service provider, to avoid originating, carrying or processing illegal robocall traffic, and to stop illegal robocallers that use its services to originate, carry or process calls, by verifying the identity of its retail end-user customers and upstream providers, monitoring the traffic on its network, collaborating with state and federal governments, law enforcement, and various industry groups, and updating any of Voradian, Inc.’s third- party contracts to reflect these requirements and measures.

Know Your Customer Procedures

Voradian is committed to complying with the Telephone Customer Protection Act (TCPA), the TRACED Act (Telephone Robocall Abuse Criminal Enforcement and Deterrence) and all relevant rules of the Federal Communications Commission pertaining to the prevention of illegal robocalling, fraudulent calling and other illegal use of its network. To that end, Voradian requires all new and renewing customers to complete a “Customer Data Sheet” form, providing and maintaining accurate information, including legal names and contact details, and to update and verify this information periodically as needed. Voradian uses this information to properly vet customers and conduct the necessary due diligence to comply with the law and protect its network.

Our vetting process involves the collection and thorough review of entity-identifying information to establish an authenticated relationship with the customer. This includes determining whether the customer is subject to any enforcement actions that restrict their calling activities, such as bans on initiating telemarketing calls. Additionally, we validate, when feasible, that the customer has a legitimate right to use the calling numbers they assert.

Our customer contracts explicitly prohibit the initiation of illegal robocalls. If we detect that a customer is engaging in suspicious robocall activity, we will issue a warning to cease such behavior. If the unlawful traffic persists, we will take immediate action to terminate their service. Furthermore, our third-party provider uses available analytics and software to help identify suspicious information and continuously monitor its network for suspicious activity.

Customer Compliance with Robocalling Rules and Existing Law

Voradian requires its customers to comply with Voradian’s Terms of Service, including Voradian’s Acceptable Use Policy (“AUP”). The AUP requires customers to use Voradian services in compliance with the law and prohibits, among other things, illegal call spoofing, fraud, and use of automatic or predictive dialing without the called party’s prior consent.



Active Monitoring of Network for Fraud

Voradian monitors its network for suspicious calling patterns; promptly investigates any alerts related to illegal, abusive, or otherwise unacceptable behavior; and applies consistent processes and standards to any allegations of service abuse and acts fairly and transparently toward our customers. After investigation, Voradian makes a determination of the appropriate action, which may include denial of service, suspension of service, termination of service, and no action. Voradian is able to immediately impose its action upon customers without delay.

In addition, Voradian offers system-wide capability to block calls and optional analytics to its customers to detect potential illegal calls or robocalls targeting Voradian customers and allows its customers to choose which of these calls to receive.

Full and Timely Compliance with Traceback Requests

Voradian responds to traceback requests within 24 hours of receiving the request, as required by the Federal Communications Commission rules. Voradian requires its resellers, channel partners, and upstream providers to comply with all traceback efforts, whether initiated by the FCC (Federal Communications Commission), the designated Industry Traceback Group, law enforcement, or by any other applicable voice service provider or interested party.

When a traceback request is made or any other credible complaint brought to its attention, Voradian will promptly investigate the suspect traffic to determine the call path(s) and whether the traffic is likely to be illegal robocalling. If the traffic is deemed highly likely to be illegal, Voradian will take appropriate steps to ensure that the suspicious traffic does not continue, including terminating the caller's access to Voradian's network.

STIR/SHAKEN Implementation

Voradian uses a third-party provider to implement the Stir/Shaken framework. Voradian is responsible for assigning attestation levels for all calls that it originates through the third-party provider.

Affiliation & Enforcement

Voradian is a privately held corporation incorporated under the laws of the State of Georgia, USA, and is actively registered in good standing with the Corporations Division of the Secretary of State of Georgia. Ebey J. Ninan owns 100% of Voradian shares. In addition, Mr. Ninan is Voradian's President and Chief Executive Officer and manages and controls Voradian's business operations. Neither Voradian nor Mr. Ninan have been subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description. Voradian has not been prohibited by the FCC from filing in the Robocall Mitigation Database.