

Robocall Mitigation Plan

Legal Name: Les Électroniques Inpro Inc.

Operating Name (DBA): Elli

1263 King E Suite: 301

Sherbrooke, QC, J1G 1E7, Canada

819-564-2482

Date: February 26th 2026

1. Company Overview

Les Électroniques Inpro Inc., operating under the trade name **Elli**, is a Canadian-based managed services provider and VoIP reseller regulated by the Canadian Radio-television and Telecommunications Commission (CRTC).

The company provides hosted VoIP and telecommunications services primarily to business customers in Canada. Elli may provision U.S. telephone numbers and interconnect with U.S. carriers through its upstream provider, SkySwitch.

Les Électroniques Inpro Inc. does not operate its own underlying carrier network infrastructure and relies on its upstream carrier partners for PSTN interconnection.

2. STIR/SHAKEN Implementation Status

Les Électroniques Inpro Inc. (Elli) operates as a reseller and does not directly control the originating carrier network responsible for STIR/SHAKEN authentication.

For traffic destined to or originating from the United States, Elli relies on its upstream carrier provider (SkySwitch and its underlying carrier partners) to implement STIR/SHAKEN authentication in accordance with applicable FCC requirements.

Elli does not knowingly manipulate, alter, or falsify caller ID information and requires customers to transmit accurate and authorized caller identification data.

3. Robocall Mitigation Practices

Les Électroniques Inpro Inc. has implemented the following measures to prevent its services from being used to originate or transmit illegal robocalls:

3.1 Customer Vetting (Know Your Customer – KYC)

- All customers must enter into a formal service agreement prior to activation.
- Customer identity and business legitimacy are verified before provisioning service.
- Enhanced due diligence is applied to higher-risk customer profiles.
- Service may be denied to applicants unable or unwilling to provide adequate identification.

3.2 Acceptable Use Policy

Customers are contractually prohibited from:

- Originating illegal robocalls.
- Transmitting fraudulent, misleading, or spoofed caller ID information.
- Engaging in unlawful telemarketing practices.

Violations may result in immediate suspension or termination of services.

3.3 Traffic Monitoring and Review

Elli monitors outbound traffic for suspicious patterns, including:

- Abnormally high call volumes.
- Short-duration call bursts.
- Sequential or auto-dialing patterns.
- Unusual geographic distribution of calls.

Suspicious activity triggers investigation and may result in temporary suspension pending review.

3.4 Caller ID Controls

- Customers may only use telephone numbers assigned to them or explicitly authorized.
 - Elli prohibits unauthorized caller ID spoofing.
 - Reports of unauthorized number usage are investigated promptly.
-

4. Enforcement and Remediation

If potential illegal robocall activity is detected:

1. Traffic is reviewed internally.
 2. The customer is contacted for clarification.
 3. Services may be suspended during investigation.
 4. Confirmed violations result in termination of services.
 5. Elli cooperates with upstream providers and regulatory authorities as appropriate.
-

5. Cooperation with Traceback and Regulatory Authorities

Les Électroniques Inpro Inc. commits to:

- Responding promptly to traceback requests from the Industry Traceback Group (ITG), upstream carriers, and regulatory authorities.
 - Maintaining call detail records (CDRs) sufficient to support traceback investigations.
 - Cooperating fully with legitimate enforcement efforts.
-

6. Record Retention

Elli maintains:

- Customer onboarding documentation.
- Signed service agreements and Acceptable Use acknowledgments.

- Call detail records for a commercially reasonable retention period.
 - Internal investigation documentation where applicable.
-

7. Ongoing Review and Compliance

This Robocall Mitigation Plan is reviewed periodically and updated as necessary to ensure compliance with:

- Applicable CRTC regulations (Canada)
 - FCC requirements (where applicable to U.S.-bound traffic)
 - Industry best practices for robocall prevention
-

Compliance Contact

Legal Entity: Les Électroniques Inpro Inc.

Operating Name: Elli

Contact Name: Alain Girard

Title: CEO

Email: alaing@elli-ti.io