

CARECO TECHNOLOGIES CORP

Robocall Mitigation Compliance with TRACED Act

CARECO TECHNOLOGIES CORP (the “Company”) is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that it learns are using our service to originate calls or transit calls into the United States and territories.

STIR/SHAKEN Implementation

The Company does not own telephone network infrastructure. The Company operates a cloud-based healthcare care coordination platform that provides voice calling to its customers (organizations that provide care coordination services) through Telnyx, its underlying carrier. Telnyx implements STIR/SHAKEN and assigns attestation levels for all calls originated through the Company’s platform. The Company lacks control over the facilities and network infrastructure necessary to implement STIR/SHAKEN directly and is fully reliant upon Telnyx to maintain the network infrastructure for STIR/SHAKEN authentication.

Traceback Cooperation

The Company commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. The Company shall cooperate with these groups to investigate and stop any illegal robocallers from using the Company’s service to carry or process illegal calls. When notified by the FCC’s Enforcement Bureau, the Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless the Company’s investigation determines that the traffic is not illegal) when the Company receives actual written notice of such traffic from the Enforcement Bureau. If the Company determines that the identified traffic is not illegal, the Company shall provide the Enforcement Bureau with an explanation as to why the Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

Know Your Customer (KYC)

The Company maintains a Know Your Customer policy and practice which includes the following:

- All customers are verified organizations that provide care coordination services. Account setup requires verification of the organization’s legal entity, address, and contact information before calling capabilities are provisioned.
- All outbound calls are initiated manually by authenticated, individual users (care coordinators) through the Company’s web-based platform. There is no automated

- dialing, predictive dialing, or robocalling functionality in the platform.
- Outbound caller ID is restricted to phone numbers that have been verified as belonging to the organization. Organizations may use an external phone number as their caller ID only after the Company has verified ownership of that number by sending a verification code to it. Users cannot set an arbitrary or unverified caller ID.
- The Company monitors customer call usage to recognize any unusually high call volume amounts that are indicative of robocall patterns.
- The Company regularly checks call patterns for possible abusive traffic.
- All calls placed through the platform are recorded and logged, providing full traceability of all call activity.

Upstream Voice Traffic Provider

The Company receives voice services from the following upstream provider:

Telnyx LLC 311 W Superior St, Suite 504, Chicago, IL 60654 Phone: 1-888-980-9750
Email: support@telnyx.com

The Company has verified that Telnyx is registered with the Robocall Mitigation Database and is following FCC RMD regulations.

Call Abuse Policy

The Company reserves the right to refuse service to any customer at any time where robocalling, unauthorized use of originating numbers, or use of invalid numbers is detected or suspected. The Company is able to block or disable any user account, organization account, or phone number, including termination of the customer relationship, to prevent robocalling, invalid originating number usage, or spoofed origination numbers from transiting the Company's network.