

Robocall Mitigation Plan

1. Purpose and Scope

Shunaki Technologies, Inc. ("The Company") is a small business voice service provider providing voice services to small businesses. The Company provides retail voice services through a white-label agreement with its upstream provider, **CoreDial**. This Robocall Mitigation Plan outlines the policies and procedures established by **Shunaki Technologies** to prevent the origination of illegal robocalls. As a reseller **CoreDial SIP** trunking services, **Shunaki Technologies** is committed to ensuring that our platforms are not used for illegal or fraudulent voice traffic.

2. Know Your Customer (KYC) Procedures

To mitigate the risk of illegal robocalling, Shunaki Technologies performs due diligence on all new and existing customers before provisioning voice services. Our procedures include:

- **Identity Verification:** Collecting and verifying legal business names, physical addresses, and tax identification numbers (EIN) for all entities.
- **Service Intent Review:** Evaluating the customers' intended use of the CoreDial SIP services to identify high-risk traffic profiles (e.g., telemarketing or high volume automated dialing).
- **Credit/Business History:** Reviewing the business standing of the customer to ensure they are a legitimate enterprise.

3. Robocall Monitoring and Mitigation

Shunaki Technologies leverages the advanced analytics and monitoring tools provided by our upstream partner, **CoreDial**, to identify suspicious calling patterns. This includes:

- **Short Duration Calls:** Monitoring for high volumes of calls lasting less than 6 seconds, which often indicates automated dialing.
- **Unallocated Numbers:** Tracking high rates of calls made to non-existent or unallocated phone numbers.
- **Call Volume Spikes:** Investigate sudden, unexplained increases in outbound call.

4. STIR/SHAKEN Status

Shunaki Technologies enables the implementation of STIR/SHAKEN through our upstream

carrier relationship.

- **Carrier Compliance:** We rely on **CoreDial** to perform the technical "signing" and attestation of calls (Level A, B, or C) as the primary voice service provider.
- **Technical Configuration:** Shunaki Technologies ensures that all PBX configurations are optimized to pass necessary SIP Header information to CoreDial, ensuring that legitimate caller ID information is preserved and authenticated.

5. Enforcement and Termination

Shunaki Technologies has a "Zero Tolerance" policy for illegal robocalling. If suspicious activity is detected:

- **Immediate Suspension:** We reserve the right to immediately suspend SIP trunking services for any customer found to be in violation of the TCPA or FCC regulations.
- **Traceback Cooperation:** We fully cooperate with the Industry Traceback Group (ITG) and law enforcement to identify the source of illegal traffic.
- **Contractual Protections:** Our Service Level Agreements (SLAs) explicitly prohibit the use of our services for illegal robocalling, providing clear grounds for permanent service termination.