

Better Financial Corporation

Robocall Mitigation Plan

Overview

Better Financial Corporation is an information services provider that develops and operates multiple AI-powered voice and communications platforms, including PowerDialer (powerdialer.ai), HealOS (healos.ai), OpenMic AI (openmic.ai), and LegalClerk AI (legalclerk.ai). These platforms serve a range of use cases including power dialing for sales teams, AI-powered front desk and medical scribe services for healthcare providers, AI voice agent services for businesses, and AI legal receptionist and intake services for law firms. Better Financial Corporation procures underlying voice services from multiple regulated telecommunications carriers and VoIP providers. Better Financial Corporation does not own or control the network infrastructure necessary to implement STIR/SHAKEN independently and believes its platforms constitute information services. Nonetheless, Better Financial Corporation files this Robocall Mitigation Plan in view of the broad definition of Voice Service Provider under FCC rules, and in support of the Commission's robocall mitigation effort.

STIR/SHAKEN Implementation

Better Financial Corporation does not control the underlying network switches or call-routing infrastructure required to independently implement STIR/SHAKEN. Better Financial Corporation does not operate switches and is not involved in the routing of voice traffic across the PSTN. Its platforms cannot originate phone calls without the services of regulated telecommunications carriers.

Better Financial Corporation's underlying telecom carriers supply NANP numbering resources and deliver calls to and from the PSTN on its behalf. These carriers are responsible for STIR/SHAKEN call authentication and are independently subject to FCC STIR/SHAKEN obligations.

Robocall Mitigation Program

Better Financial Corporation employs a multi-layered approach to detect, prevent, and mitigate illegal robocall activity across all of its platforms. This framework integrates internal monitoring, external data sources, and contractual compliance obligations to identify anomalous calling behavior and support rapid intervention consistent with Commission requirements.

Better Financial Corporation's robocall mitigation program is designed to meet or exceed requirements set forth in 47 CFR § 64.6305(a) and the Commission's January 6, 2026, Eighth Report and Order in CG Docket No. 17-59. All customers across each platform are contractually required to comply with applicable federal and state laws governing telephone communications, including the Telephone Consumer Protection

Act (TCPA) and the FTC's Telemarketing Sales Rule. Acceptable use policies for each platform are available at the following URLs:

Better Financial Corporation reinforces these safeguards through its Responsible Calling Standards, a structured compliance framework applied across all platforms that establishes enforceable rules for lawful, ethical, and high-integrity communications. The Responsible Calling Standards govern onboarding requirements, permitted use cases, call content integrity, DNC compliance, and escalation procedures — providing a consistent baseline of accountability across PowerDialer, HealOS, OpenMic AI, and LegalClerk AI.

- PowerDialer: <https://powerdialer.ai/terms>
- HealOS: <https://www.healos.ai/terms>
- OpenMic AI: <https://openmic.ai/tos>
- LegalClerk AI: <https://legalclerk.ai/terms>

Know Your Customer (KYC) Protocols

Better Financial Corporation maintains a comprehensive KYC program applied at customer onboarding and throughout the customer lifecycle across all platforms. KYC protocols include:

- Identity verification: full name, email address, business title, and physical address
- Business verification: business name, address, and state of formation
- Third-party business and identity verification standards, including phone number and IP address validation
- Anti-fraud screening applied at account creation and on an ongoing basis
- Phone number verification via SMS at registration: only non-VoIP mobile numbers are accepted for verification purposes; VoIP and landline numbers are not permitted. Each phone number may be associated with only one account, preventing duplicate or shared-identity registrations
- Enhanced fraud detection and business verification (planned): Better Financial Corporation plans to implement Persona, an AI-driven risk assessment tool that will add EIN verification alongside evaluation of device data, browser characteristics, IP history, mobile verification, payment details, and CAPTCHA validation to further strengthen onboarding integrity

Traffic Monitoring and Anomaly Detection

Following onboarding, customer call traffic is continuously monitored across all platforms to detect patterns indicative of unlawful calling practices. Better Financial Corporation's analytics framework enables real-time identification of suspicious calling behavior across customer and network traffic, with prompt notification of high-risk activity or anomalies to facilitate timely intervention.

Real-time scrubbing against the National Do-Not-Call Registry is available to customers with a do-not-call scrubbing obligation. Better Financial Corporation reserves the right to

restrict or terminate services to any customer whose traffic patterns raise heightened compliance concern.

Better Financial Corporation conducts transcript-level analysis across all voice conversations on its platforms. Calls are screened in real time for spam, scam, and high-risk keywords. Any account found to be engaging in communications containing prohibited language or content patterns is subject to immediate suspension or termination of services.

Enforcement and Remediation

If Better Financial Corporation receives an external notification alleging a customer violation of consumer protection or telecommunications laws, or if internal monitoring raises heightened concern about a customer's compliance, Better Financial Corporation will conduct additional due diligence and, where warranted, suspend or terminate that customer's access to its platforms.

Upstream Voice Traffic

To the extent Better Financial Corporation could be considered a voice service provider, it does not accept calls directly from any upstream voice providers for origination purposes.

Traceback Cooperation

Better Financial Corporation will respond to traceback requests from the FCC, FTC, law enforcement agencies, or the Industry Traceback Group within 24 hours of receiving notice, or within any longer timeframe specified by the requester.

Plan Updates

Better Financial Corporation will update this Robocall Mitigation Plan within 10 business days of any material modification to the practices described herein.