

Apex Trading, LLC

Robocall Mitigation Program

Pursuant to the rules of the Federal Communications Commission, including 47 CFR Section 64.6305 (Robocall Mitigation and Certification), Apex Trading, LLC has implemented the following Robocall Mitigation Program:

Apex Trading LLC provides PBX installation, configuration, and technical support services. The company does not originate, terminate, or transmit calls to the public switched telephone network (PSTN) and does not provide SIP trunking, DIDs, or telecommunications services.

All voice traffic is transmitted through third-party voice service providers selected and contracted directly by customers. These providers are responsible for call authentication, including implementation of STIR/SHAKEN, and for compliance with applicable FCC robocall mitigation requirements.

Apex Trading LLC has implemented a Robocall Mitigation Program designed to prevent misuse of PBX systems under its management. Measures include:

- 1 Deployment of baseline security controls on PBX systems, including authentication requirements, access restrictions, and intrusion prevention mechanisms
- 2 Monitoring of system-level indicators such as call detail records (CDRs), authentication attempts, and abnormal usage patterns
- 3 Detection of suspicious activity, including high call volume bursts, short-duration calls, and irregular dialing behavior
- 4 Implementation of controls to limit unauthorized or excessive outbound calling, including rate limiting and dialing restrictions where appropriate
- 5 Immediate response procedures, including the ability to disable outbound calling or suspend system access in the event of suspected fraud or compromise

Apex Trading LLC requires customers to acknowledge responsibility for all telecommunications activity and compliance with applicable laws, including the Telephone Consumer Protection Act and the Truth in Caller ID Act.

In the event of suspected illegal robocalling or system compromise, Apex Trading LLC will take reasonable steps to mitigate further activity and will cooperate with customer-selected voice service providers and lawful traceback or investigative requests, including those coordinated through the U.S. Telecom Industry Traceback Group.

Apex Trading LLC maintains relevant system logs and records sufficient to support investigation and mitigation efforts.

This program is designed to reduce the risk of illegal robocalls while maintaining the company's role as a systems integrator and technical service provider, not a telecommunications carrier.