

1. COMPANY OVERVIEW

SMSFLY LLC (the "Company") operates an SMS platform that provides users with virtual phone numbers for receiving SMS messages. Received messages are automatically delivered to the user's registered personal phone number(s).

The Company does not originate, transmit, or complete voice calls of any kind. The Company does not enable users to manually compose or send outbound SMS messages. All outbound traffic is limited to automated system-level delivery of inbound messages.

2. STIR/SHAKEN CERTIFICATION STATUS

The Company does not originate or carry voice calls and is therefore not subject to STIR/SHAKEN implementation requirements under 47 CFR § 64.6301 et seq.

3. ROBOCALL MITIGATION PROGRAM

As the Company does not originate voice traffic, the risk of contributing to illegal robocalling is not applicable to its core operations. Nonetheless, the Company maintains the following measures to prevent misuse of its numbering resources:

3.1 Customer Onboarding & Verification

- Users must verify a valid email address prior to accessing virtual number services.
- Users must register and verify at least one personal phone number as a delivery destination, verified via a third-party authentication application.
- Virtual number access is restricted until both



verifications are successfully completed.

3.2 Virtual Number Allocation Controls

- Each user account is limited to a defined number of virtual numbers to prevent bulk acquisition.

3.3 No Outbound Origination

- The Company does not provide any interface or API capability for users to compose or send outbound SMS.
- All outbound SMS traffic is system-generated only, not user-initiated.

3.4 Complaint Handling

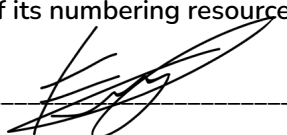
- Abuse reports and takedown requests are reviewed promptly by the compliance contact listed below.
- Accounts found in violation of the Company's Terms of Service are subject to suspension or termination and reclamation of numbering resources.

4. COMPLIANCE CONTACT

Franco Panozzo Vitoloni — Founder
SMSFLY LLC
30 N Gould St, STE 58952
Sheridan, WY 82801
Email: franco.panozzo@smsfly.io

5. CERTIFICATION

I certify that the information provided in this Robocall Mitigation Program is true and accurate, and that the Company is committed to maintaining reasonable measures to prevent the misuse of its numbering resources.

Signature:  _____

Name: Franco Panozzo Vitoloni

Title: Founder

Company: SMSFLY LLC

Date: 19 / 05 / 2026