

Robocall Mitigation Program Description

Strategy B LLC

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1. Purpose and Scope

This Robocall Mitigation Program Description describes the policies, controls, and operating procedures that Strategy B LLC ("Strategy B") uses to prevent unlawful robocall traffic from originating through its CRM and communications platform. Strategy B submits this description in connection with its Robocall Mitigation Database filing as a Voice Service Provider without a direct STIR/SHAKEN implementation obligation.

Strategy B provides CRM, messaging, dialer, and workflow software to business customers. Strategy B is not a traditional telecommunications carrier and does not operate the underlying public switched telephone network ("PSTN") infrastructure, Session Border Controllers, certificate authority functions, token access, or carrier interconnection facilities necessary to sign calls directly under the STIR/SHAKEN framework. Outbound voice connectivity is provided through Commio and applicable upstream carrier network partners. Strategy B maintains the mitigation program described below for traffic originated through its platform.

2. Role in the Call Chain and STIR/SHAKEN Status

Strategy B originates outbound voice traffic through its software platform on behalf of authenticated business users. Strategy B relies on Commio and upstream carrier network partners for PSTN connectivity and applicable network-level call authentication functions.

Because Strategy B does not control the network infrastructure necessary to implement STIR/SHAKEN directly, Strategy B certifies that it has not implemented STIR/SHAKEN authentication on any portion of its own network. Strategy B nevertheless subjects calls originated through its platform to this robocall mitigation program and cooperates with Commio, upstream carriers, the FCC, law enforcement, and the Industry Traceback Group to identify, investigate, and stop unlawful traffic.

3. Nature of Traffic

Strategy B's expected outbound voice traffic consists of business-to-consumer and business-to-business calls placed by Strategy B customers using the CRM platform, including sales follow-up, appointment scheduling, customer service, lead response, and related business communications.

Strategy B does not authorize customers to use the platform for unlawful robocalls, spoofing, scam campaigns, fraudulent traffic, abusive high-volume calling, or calls using artificial or prerecorded voice messages unless the customer has obtained all legally required consent and complies with all applicable law. Strategy B may suspend, restrict, or terminate accounts or campaigns that generate suspicious, unlawful, abusive, or non-compliant traffic.

4. Customer Onboarding and Know-Your-Customer Procedures

Strategy B requires customers and users to maintain authenticated accounts before using the platform. Strategy B collects and maintains account information that may include organization name, user identity, contact information, billing information, phone numbers, campaign/workflow configuration, and usage records.

Strategy B may review new or renewing customer accounts, phone number assignments, calling use cases, volume patterns, complaint activity, payment status, and other risk indicators. Strategy B's customer terms prohibit illegal robocalling, caller ID spoofing, fraud, harassment, unlawful lead generation, and use of the platform without required consent. Strategy B may require additional information, restrict features, disable calling, or terminate access where customer identity, use case, consent basis, or traffic behavior creates unacceptable risk.

5. Customer Consent and Lawful-Use Requirements

Strategy B requires customers to call only contacts for whom they have a lawful basis to place the call, including any consent required under the Telephone Consumer Protection Act, FCC rules, state law, Do-Not-Call rules, and other applicable requirements. Customers are responsible for ensuring that uploaded or imported contacts, leads, and call workflows comply with applicable law and that consent records are accurate and retained.

The platform supports maintaining contact records, tags, workflows, opt-out status, activity history, and messaging/calling history. These records assist Strategy B and its customers in investigating complaints, validating contact history, and responding to traceback or carrier inquiries.

6. Caller ID, Number Use, and Anti-Spoofing Controls

Strategy B does not permit customers to intentionally spoof caller ID or originate calls from numbers they are not authorized to use. Outbound calling is tied to phone numbers assigned to or configured for the customer account through Strategy B and its voice providers. Strategy B may restrict or disable numbers, accounts, or workflows associated with suspicious caller ID use, fraud complaints, traceback requests, or carrier/provider warnings.

Strategy B will cooperate with Commio and upstream carriers to investigate suspected spoofing or unauthorized number use and will take corrective action where abuse is identified.

7. Do-Not-Call, Opt-Out, and Suppression Controls

Strategy B provides account-level contact management and suppression controls intended to prevent continued outreach to contacts who opt out or should not be contacted. Customers are required to honor consumer do-not-call and opt-out requests. Strategy B may block or suppress future outreach

to contacts marked as opted out, blocked, or otherwise ineligible within the platform.

Customers remain responsible for National Do-Not-Call, state Do-Not-Call, internal do-not-call, and industry-specific compliance obligations. Strategy B may investigate accounts with elevated complaints, opt-outs, spam reports, failed traffic, or other indicators of non-compliance.

8. Traffic Monitoring, Analytics, and Abuse Detection

Strategy B monitors platform activity for indicators of illegal or abusive traffic. Monitoring may include call and message volume, send/call rates, workflow activity, repeated failed traffic, complaint signals, spam/block indicators, opt-out activity, traceback notices, carrier warnings, anomalous account behavior, and unusual changes in traffic patterns.

Strategy B uses internal platform analytics, logs, database records, carrier/provider feedback, and operational review to identify suspicious traffic. Strategy B does not currently rely on a standalone third-party robocall analytics vendor for its internal mitigation program; if that changes, Strategy B will update this filing as required. Strategy B may also rely on Commio and upstream carrier analytics, blocking, traceback, or fraud-prevention systems as part of the broader call path.

9. Mitigation Actions

When Strategy B identifies suspected illegal, fraudulent, spoofed, or abusive traffic, it may take immediate mitigation action, including pausing or disabling calling, pausing workflows, suspending users, restricting phone numbers, blocking outbound traffic, requiring customer remediation, preserving records, terminating accounts, and notifying or cooperating with Commio, upstream carriers, law enforcement, the FCC, or the Industry Traceback Group as appropriate.

Strategy B's mitigation approach is designed to stop suspicious traffic quickly while preserving records needed to investigate the source, customer account, phone number, user, workflow, call path, and related activity.

10. Traceback Response Commitment

Strategy B commits to respond fully and within 24 hours to traceback requests and related inquiries from the FCC, law enforcement, the Industry Traceback Group, Commio, upstream carriers, or other authorized entities. Strategy B will cooperate with such entities to investigate, identify, and stop illegal robocallers or unlawful traffic that use or attempt to use Strategy B's platform.

Traceback and robocall mitigation inquiries should be directed to Jack DeBrabander, CEO, at jack@strategyb.co and +1 (734) 536-9414. Strategy B will use available account records, phone number data, call logs, customer information, workflow records, and carrier/provider identifiers to investigate and respond.

11. Upstream Provider Coordination

Strategy B uses Commio and applicable upstream carrier partners for PSTN voice services. Strategy B will coordinate with Commio and upstream providers to address suspected illegal robocall traffic, caller ID issues, traceback requests, customer abuse, network-level blocking, STIR/SHAKEN-related questions, and other voice compliance matters.

Strategy B will not knowingly route traffic through providers or arrangements designed to evade lawful traceback, blocking, caller ID authentication, or robocall mitigation requirements.

12. Recordkeeping

Strategy B maintains operational records that may include customer account information, user activity, contact records, phone number assignments, outbound call attempts, call status data, workflow/campaign configuration, timestamps, provider identifiers where available, complaint information, and mitigation actions. Strategy B retains records as reasonably necessary for operations, billing, support, abuse investigations, traceback response, and legal or regulatory compliance.

13. Review and Updates

Strategy B will review this Robocall Mitigation Program Description at least annually and will update its Robocall Mitigation Database filing within the time required by FCC rules if material information changes. Strategy B will also update this program as its voice services, upstream providers, risk controls, legal obligations, or platform features change.

14. Certification

Strategy B LLC certifies that all calls originated through its platform are subject to the robocall mitigation program described in this document, that any prior certification has not been removed by Commission action, and that Strategy B has not been prohibited from filing in the Robocall Mitigation Database by the Commission. Strategy B further certifies that the information in this description is true and accurate to the best of its knowledge and belief.

Jack DeBrabander, Chief Executive Officer

Strategy B LLC

Date: May 24, 2026