

Robocall Mitigation Program

PCCP S.A. - FRN: 0036876407

Company Overview

PCCP S.A. is a telecommunications service provider incorporated in Argentina. The company provides voice and telecommunications services to business customers and routes international voice traffic through authorized wholesale carriers and interconnection partners.

PCCP S.A. does not currently implement STIR/SHAKEN authentication technology. Accordingly, the company maintains the following Robocall Mitigation Program to prevent the origination, transmission, and facilitation of illegal robocalls and fraudulent telecommunications traffic.

Customer Verification Procedures

Prior to activating telecommunications services, PCCP S.A. performs customer verification procedures which may include:

- Collection of customer identification and contact information.
- Verification of business registration information when applicable.
- Validation of billing and payment information.
- Review of the intended use of telecommunications services.
- Verification of customer identity before enabling outbound calling services.

Services may be denied, restricted, or suspended if inaccurate, incomplete, or misleading information is provided.

Prohibition of Illegal Robocalls

PCCP S.A. prohibits the use of its network for:

- Illegal robocalling activities.
- Telephone fraud schemes.
- Phishing campaigns.
- Caller ID spoofing in violation of applicable regulations.
- Any activity intended to deceive call recipients.

Customers are contractually prohibited from engaging in such activities and may be subject to immediate suspension or termination of service.

Traffic Monitoring and Network Controls

PCCP S.A. monitors network activity and customer traffic patterns for indicators of potentially unlawful robocall activity, including:

- Sudden increases in call volume.
- Excessive short-duration calls.
- Sequential or automated dialing patterns.
- Abnormal call completion statistics.
- Unusual traffic behavior from newly activated customers.

The company also applies customer-specific traffic limits and may investigate, restrict, or suspend traffic exhibiting suspicious characteristics.

Caller ID Practices

PCCP S.A. requires customers to present only valid and authorized caller identification information.

Traffic containing invalid, misleading, unauthorized, or suspicious caller identification may be blocked, investigated, or suspended.

Response to Complaints and Traceback Requests

PCCP S.A. maintains procedures for responding promptly to complaints concerning illegal robocalls, fraudulent traffic, or suspected misuse of telecommunications services.

The company will cooperate with authorized traceback requests from carriers, industry traceback organizations, and regulatory authorities and will investigate the origin of suspicious traffic when requested.

Record Retention

PCCP S.A. maintains customer account information and call detail records (CDRs) for a reasonable period of time to support investigations, traceback requests, fraud prevention efforts, and compliance obligations.

Enforcement Actions

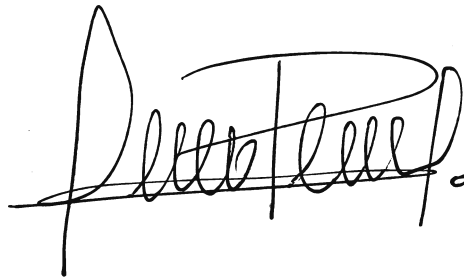
Where unlawful robocalling activity or fraudulent telecommunications activity is identified, PCCP S.A. may:

- Suspend customer services.
- Block suspicious traffic.
- Require additional customer verification.
- Terminate customer accounts.
- Cooperate with wholesale carriers and regulatory authorities.

Program Review

PCCP S.A. periodically reviews and updates this Robocall Mitigation Program to ensure continued effectiveness and compliance with applicable industry practices and regulatory requirements.

Authorized Representative

A handwritten signature in black ink, appearing to read 'Jose Luis Paineira', with a stylized, cursive script.

Company: **PCCP S.A.**

Name: **JOSE LUIS PAINEIRA**

Title: **PRESIDENT**

Date: **06-09-2026**