

Robocall Mitigation Program

Definitions and Abbreviations

For purposes of this Robocall Mitigation Program, the following definitions and abbreviations apply:

- **Teamnexus** – Teamnexus Solution LLC.
- **Company** – Teamnexus Solution LLC.
- **Customer** – Any business entity approved by Teamnexus to utilize its hosted PBX services.
- **PBX** – Private Branch Exchange.
- **PSTN** – Public Switched Telephone Network.
- **SIP** – Session Initiation Protocol.
- **DID** – Direct Inward Dialing telephone number.
- **SME** – Small and Medium-sized Enterprise, as defined by applicable United States standards and Teamnexus's internal customer eligibility requirements.
- **KYC** – Know Your Customer; Teamnexus's customer verification and due diligence process.
- **CPS** – Calls Per Second; a technical control used to limit outbound call origination rates.
- **STIR/SHAKEN** – Secure Telephone Identity Revisited / Signature-based Handling of Asserted Information Using toKENs; the industry framework used to authenticate caller identity.
- **SPC Token** – Service Provider Code Token issued under the STI Governance Authority framework and used to obtain STIR/SHAKEN signing certificates.
- **STI-GA** – Secure Telephone Identity Governance Authority.
- **FCC** – Federal Communications Commission.
- **ITG** – Industry Traceback Group, the FCC-designated registered industry traceback consortium.
- **SOP** – Standard Operating Procedure.

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TeamNexus Solutions is a technology company founded by four lifelong friends with a shared passion for innovation. We deliver modern, reliable, and scalable systems for businesses across hospitality and beyond, built with integrity, collaboration, and a commitment to exceptional service.

STIR/SHAKEN Certification Basis

Certification Selected: Option 3 – No STIR/SHAKEN Implementation.

Teamnexus Solutions provides a hosted PBX platform for small and medium-sized businesses within the United States. Teamnexus does not operate PSTN switching facilities, own or operate Class 4 or Class 5 switching equipment, maintain direct interconnections with the Public Switched Telephone Network (PSTN), or control the upstream authentication of telephone calls. Teamnexus's service is limited to providing hosted PBX functionality and related communications management services.

Customers may either utilize an upstream SIP trunk supported by Teamnexus or connect SIP trunking services obtained independently from a carrier of their choosing. Teamnexus does not authenticate or originate PSTN traffic at the carrier level. Where Teamnexus-supported upstream carriers are utilized, STIR/SHAKEN authentication is performed by the upstream carrier in accordance with that carrier's implementation.

Teamnexus does not currently possess an Operating Company Number (OCN), has not obtained an SPC Token, does not possess STI certificates, and therefore does not independently implement STIR/SHAKEN authentication under 47 CFR § 64.6301. Teamnexus believes the exemption applicable to voice service providers that are incapable of obtaining an SPC Token due to Governance Authority policy applies to its current operating model.

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Robocall Mitigation Program

Purpose

The purpose of this Robocall Mitigation Program is to prevent the Teamnexus hosted PBX platform from being used to originate illegal robocalls, caller ID spoofing, fraudulent telecommunications activity, or other unlawful conduct. Teamnexus maintains a risk-based compliance program centered on customer verification, ongoing monitoring, acceptable use enforcement, and cooperation with regulatory authorities.

Customer Eligibility

Teamnexus intentionally limits its customer base and does not operate as a mass-market telecommunications provider.

Teamnexus provides services only to legitimate United States-based small and medium-sized enterprises (SMEs). Customers must qualify as SMEs consistent with applicable United States standards and Teamnexus's internal onboarding policies.

Teamnexus does not provide services to:

- Non-United States business entities.
- Anonymous or unverifiable organizations.
- Telemarketing companies whose primary business involves cold calling.
- Call centers conducting outbound mass-calling campaigns.
- Businesses primarily engaged in robocalling or bulk outbound sales activity.
- Customers whose intended use presents an elevated fraud or abuse risk.

Service Scope

Teamnexus is a managed hosted PBX provider and software platform. Teamnexus's primary business is the provisioning and management of hosted PBX solutions for verified United States small and medium-sized businesses. Teamnexus is not a wholesale voice carrier and does not market its services to high-volume telecommunications providers.

Teamnexus does not provide:

- Wholesale voice services.
- Wholesale SIP trunking.
- International voice termination services.

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- Least Cost Routing (LCR) services.
- Bulk outbound calling services.
- Predictive dialer platforms.
- Call center platforms designed for mass outbound calling campaigns.
- DID resale independent of a hosted PBX deployment.
- Anonymous or self-service voice service activation.

Voice services are offered only as part of a managed hosted PBX deployment. Customers may elect to utilize SIP trunking obtained independently from a carrier of their choosing, in which case Teamnexus provides PBX hosting and configuration only. Teamnexus does not assume responsibility for the customer's upstream carrier relationship or carrier-level regulatory obligations. Regardless of the SIP trunk provider selected, Teamnexus prohibits the use of unauthorized caller identification and requires that all presented telephone numbers be assigned to, or otherwise lawfully authorized for use by, the customer.

Teamnexus intentionally maintains a limited customer base and focuses exclusively on long-term relationships with verified small and medium-sized businesses. Teamnexus's business model prioritizes customer verification, operational oversight, and regulatory compliance over customer volume or rapid account acquisition.

Customer Due Diligence (Know Your Customer)

Teamnexus maintains a strict Know Your Customer (KYC) onboarding process.

Prior to activation of any hosted PBX service:

- Every customer is individually reviewed.
- A Teamnexus account manager must be able to personally identify, verify, and vouch for each customer approved for service.
- The customer's physical business location must be verified as an operating legitimate business.
- Business registration information is collected and retained.
- Federal tax documentation, including IRS Form W-9 where applicable, is collected and maintained.
- Customer contact information, authorized representatives, installation records, and supporting business documentation are securely retained.

No customer is activated until Teamnexus has completed its internal verification procedures.

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Network Usage Restrictions

Teamnexus maintains strict acceptable use policies designed to prevent abuse.

Specifically:

- Cold calling is prohibited.
- Mass outbound sales campaigns are prohibited.
- Auto-dialing campaigns are prohibited unless specifically reviewed and approved for a lawful purpose.
- Caller ID spoofing is prohibited.
- Customers may transmit only telephone numbers assigned to them or numbers for which they possess documented authorization.
- Customers utilizing their own SIP trunks remain responsible for ensuring compliance with applicable carrier and FCC requirements.

Any attempt to present unauthorized caller identification constitutes a material violation of Teamnexus's Terms of Service.

Technical Controls

Although Teamnexus does not control upstream carrier infrastructure, Teamnexus implements technical safeguards within its hosted PBX environment, including:

- Call-per-second (CPS) limitations appropriate for each customer's documented business operations.
- Continuous monitoring for abnormal calling patterns.
- Detection of unusual traffic spikes.
- Monitoring for excessive concurrent call attempts.
- Monitoring for unusual destination patterns.
- Investigation of abnormal usage outside expected customer behavior.

Teamnexus may temporarily restrict or suspend services while investigations are conducted.

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Ongoing Compliance Monitoring

Compliance activities continue after customer onboarding.

Teamnexus performs:

- Continuous monitoring of customer activity.
- Random monthly compliance audits of customer deployments.
- Verification that inbound and outbound routing remains consistent with approved installation documentation.
- Review of any configuration changes presenting elevated fraud risk.
- Documentation of audit findings and corrective actions where necessary.

Enforcement

Where Teamnexus determines that a customer has violated applicable law, Teamnexus's Terms of Service, or this Robocall Mitigation Program, Teamnexus may immediately:

- Suspend the customer account.
- Freeze hosted PBX services.
- Reject outbound call attempts.
- Remove caller ID privileges.
- Terminate service.
- Preserve relevant records for investigation.

Service restoration may occur only after Teamnexus determines the violation has been resolved to its satisfaction.

Cooperation with Regulatory Authorities

Teamnexus fully cooperates with:

- The Federal Communications Commission.
- Federal, state, and local law enforcement agencies.
- The Industry Traceback Group.
- Other authorized governmental agencies conducting lawful investigations.

Teamnexus commits to responding fully and within twenty-four (24) hours to traceback requests and lawful inquiries, consistent with applicable FCC requirements.

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Investigation Procedures

Teamnexus maintains a documented Standard Operating Procedure (SOP) governing investigations involving suspected illegal robocalls, spoofing, fraudulent telecommunications activity, or traceback requests.

The SOP includes procedures for:

- Immediate preservation of relevant records.
- Review of customer onboarding documentation.
- Review of call records and PBX logs.
- Investigation of routing information.
- Suspension where appropriate.
- Coordination with upstream carriers.
- Cooperation with regulatory agencies and law enforcement.
- Documentation of investigative findings and corrective actions.

This SOP is maintained internally and will be provided to authorized governmental agencies upon lawful request.

Program Review

This Robocall Mitigation Program will be reviewed periodically and updated as necessary to remain consistent with applicable FCC regulations, industry best practices, Teamnexus's operating model, and emerging telecommunications threats.

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