

ASSIST TELECOMMUNICATIONS USA LLC

ROBOCALL MITIGATION PLAN

Prepared Pursuant to 47 C.F.R. § 64.6305

Version: 1.0

Robocall Mitigation Plan

I. Purpose and Regulatory Commitment

This Robocall Mitigation Plan ("Plan") has been adopted by **Assist Telecommunications USA LLC** ("Assist Telecommunications", "Assist", "the Company", "we", "our" or "us") in accordance with the requirements of **47 C.F.R. § 64.6305** and other applicable rules adopted by the Federal Communications Commission ("FCC") relating to the mitigation of unlawful robocalls.

Assist Telecommunications recognises that illegal robocalls, caller ID spoofing, telephone fraud and unlawful automated calling campaigns undermine trust in telecommunications networks and create significant risks for consumers, businesses, service providers and public authorities. Accordingly, the Company is committed to implementing and maintaining reasonable, risk-based policies, operational controls and technical safeguards designed to prevent the use of its network and services for unlawful robocalling activities.

As a provider of business telecommunications services, Assist Telecommunications maintains a zero-tolerance approach towards illegal robocalls, unlawful caller identification practices, telecommunications fraud and any activity that violates applicable telecommunications laws or regulations.

This Plan describes the policies, procedures and mitigation measures currently implemented by Assist Telecommunications to reduce the risk that its services may be used to originate, facilitate or support illegal robocalls.

In addition to the controls described throughout this Plan, Assist Telecommunications commits to cooperating fully with the Federal Communications Commission, authorised law enforcement agencies, the Industry Traceback Group ("ITG"), upstream telecommunications providers and other competent authorities in investigating and preventing unlawful robocall activity.

Assist Telecommunications will respond promptly and in good faith to legitimate traceback requests and will dedicate appropriate internal resources to assist with the investigation of suspected illegal robocalls originating from or traversing its services.

The Company further commits to continuously reviewing and improving its robocall mitigation procedures as industry standards, regulatory expectations and telecommunications technologies continue to evolve.

II. Company Profile

Assist Telecommunications USA LLC is a United States business telecommunications provider specialising in cloud communications and enterprise voice solutions for commercial customers. The Company primarily provides business-to-business (B2B) communications services, including Voice over Internet Protocol (VoIP), SIP Trunking, Hosted PBX, Unified Communications as a Service (UCaaS), virtual telephone numbers (DIDs), inbound number porting, SMS services, eSIM solutions and related cloud communications services.

Assist Telecommunications primarily serves legitimate commercial customers and does not market its telecommunications services to residential consumers. The Company's business model is predominantly focused on inbound business communications and customer communication solutions rather than high-volume outbound voice campaigns.

Assist Telecommunications delivers certain telecommunications services through carefully selected upstream telecommunications providers and carrier partners. As a result, portions of the Company's service architecture rely upon carrier infrastructure operated by established telecommunications providers while Assist Telecommunications maintains responsibility for customer onboarding, compliance oversight, service management and ongoing fraud prevention within its own operational environment.

Robocall prevention forms an integral component of the Company's wider compliance framework, which also includes customer due diligence procedures, contractual controls, fraud monitoring, acceptable use policies, information security controls and ongoing operational oversight.

III. STIR/SHAKEN Implementation Status

Assist Telecommunications supports the objectives of the STIR/SHAKEN caller authentication framework and recognises its importance in improving trust in voice communications and reducing unlawful caller identification spoofing.

The Company currently operates primarily through infrastructure and services provided by established upstream telecommunications carriers. Where STIR/SHAKEN authentication is available through those upstream providers, Assist Telecommunications relies upon the authentication capabilities implemented within those carrier networks.

To the extent that any portion of the Company's service architecture does not independently initiate, maintain, carry, process and terminate interconnected SIP traffic capable of supporting end-to-end STIR/SHAKEN authentication, Assist Telecommunications relies upon the applicable regulatory framework governing such services together with the comprehensive mitigation measures described throughout this Plan.

The absence of independent STIR/SHAKEN implementation within portions of the Company's operational environment does not diminish the Company's commitment to preventing illegal robocalls.

Accordingly, Assist Telecommunications has implemented a comprehensive Robocall Mitigation Programme incorporating customer due diligence, traffic monitoring, contractual safeguards, fraud detection, number validation procedures, call analytics, customer usage reviews and cooperation with industry traceback initiatives.

The Company will continue to monitor regulatory developments and industry best practices relating to STIR/SHAKEN implementation and will evaluate additional technical capabilities as its network architecture and operational requirements evolve.

IV. Commitment to Regulatory Cooperation

Assist Telecommunications is committed to maintaining an open and cooperative relationship with regulatory authorities and recognised industry organisations engaged in combating illegal robocalls.

The Company will cooperate fully with lawful requests received from the Federal Communications Commission, authorised law enforcement agencies, the Industry Traceback Group and other competent governmental or regulatory authorities having jurisdiction over telecommunications services.

Where a valid traceback request is received, Assist Telecommunications will promptly review the relevant information, identify available call records, determine the originating customer or upstream provider where reasonably possible and provide responsive information consistent with applicable legal obligations and customer confidentiality requirements.

Assist Telecommunications aims to acknowledge and respond to legitimate traceback requests as promptly as reasonably practicable and, wherever operationally feasible, within twenty-four (24) hours of receipt.

To facilitate efficient communication, the Company has designated a dedicated Traceback Request Single Point of Contact identified within **Appendix A** of this Plan.

The Company will also cooperate with upstream carriers and interconnected service providers where coordination is reasonably necessary to investigate or mitigate suspected unlawful robocall activity.

V. Customer Due Diligence and Subscriber Vetting

Assist Telecommunications recognises that effective customer onboarding is one of the most important safeguards against illegal robocalling, caller ID spoofing and telecommunications fraud. Accordingly, the Company maintains a comprehensive customer due diligence programme designed to verify the identity and legitimacy of prospective customers before telecommunications services are provisioned.

The Company provides services exclusively to business and commercial customers and does not offer telecommunications services to residential consumers. Every prospective customer is subject to a risk-based onboarding process intended to establish the legitimacy of the organisation, verify its authority to obtain telecommunications services and assess the intended use of those services.

As part of its onboarding procedures, Assist Telecommunications may obtain and verify, where appropriate, business registration documents, certificates of incorporation or formation, employer or taxpayer identification numbers, registered business addresses, principal places of business, official websites and domains, government-issued identification for authorised directors or representatives, contact information for responsible personnel and any additional documentation reasonably required to satisfy the Company's internal compliance requirements.

Where a customer seeks access to services capable of supporting higher traffic volumes, wholesale telecommunications activities or other services presenting an elevated compliance risk, Assist Telecommunications reserves the right to conduct enhanced due diligence. Such enhanced reviews may include additional verification of corporate ownership, review of the customer's business model, verification of regulatory registrations where applicable, confirmation of intended traffic profiles and any other measures reasonably necessary to assess potential fraud or robocall risk.

The Company reserves the right to decline service, delay activation, request additional documentation or refuse the allocation of numbering resources where customer information cannot be satisfactorily verified or where circumstances indicate an elevated risk of fraud, spoofing or unlawful telecommunications activity.

Customer onboarding does not conclude upon service activation. Assist Telecommunications continues to monitor customer accounts throughout the duration of the commercial relationship and may conduct periodic compliance reviews where changes in customer behaviour, traffic patterns or other indicators justify further investigation.

VI. Contractual Controls and Acceptable Use Requirements

Assist Telecommunications incorporates robocall prevention and telecommunications compliance obligations throughout its contractual documentation, including its Terms and Conditions, Acceptable Use Policy and customer service agreements.

All customers are contractually prohibited from using the Company's services for any unlawful purpose, including but not limited to the transmission of illegal robocalls, unlawful prerecorded or automated calling campaigns, caller ID spoofing, telecommunications fraud, phishing, vishing, scam campaigns, unlawful telemarketing activities or any activity prohibited under applicable federal, state, provincial or international law.

Customers are further prohibited from originating calls using telephone numbers that they do not own or have not been authorised to use, transmitting misleading or inaccurate caller identification information, intentionally concealing the identity of the calling party, circumventing regulatory requirements or engaging in any conduct intended to facilitate

unlawful telecommunications activity. The Company reserves the contractual right to suspend, restrict or immediately terminate telecommunications services where it reasonably believes that customer services are being used in violation of applicable law, contractual obligations or this Robocall Mitigation Plan.

Where appropriate, Assist Telecommunications may also preserve relevant call records, cooperate with law enforcement authorities, notify upstream providers and take any additional action reasonably necessary to protect the integrity of its network and the wider telecommunications ecosystem.

VII. Telephone Number Validation

Maintaining the integrity of caller identification information is a fundamental component of Assist Telecommunications' robocall mitigation programme. The Company has established procedures designed to ensure that customers use only telephone numbers that have been validly assigned, ported or otherwise authorised for use in connection with their telecommunications services.

Customers may present caller identification information only where the telephone number has been assigned directly by Assist Telecommunications, provisioned through an authorised upstream carrier partner, successfully ported to the Company's network or otherwise validated through appropriate operational procedures. During customer onboarding and service provisioning, Assist Telecommunications performs reasonable validation procedures intended to confirm a customer's authority to utilise requested numbering resources.

Where number portability services are provided, the Company follows applicable industry procedures governing inbound number porting and validates the customer's authority to port telephone numbers before activation.

The Company prohibits the use of fabricated, misleading, unauthorised or spoofed caller identification information. Any attempt to utilise unauthorised numbering resources may result in immediate suspension of service pending investigation.

Where operationally appropriate, Assist Telecommunications may conduct additional validation procedures before permitting the use of newly assigned or ported telephone numbers, particularly where elevated fraud indicators are identified.

VIII. Monitoring, Traffic Analysis and Fraud Detection

Assist Telecommunications employs a combination of technical controls, operational oversight and internal monitoring procedures designed to identify unusual telecommunications activity that may indicate fraud, illegal robocalling or other prohibited conduct. The Company's operational model is primarily focused on inbound business communications rather than large-scale outbound calling campaigns. Nevertheless, all customer activity remains subject to ongoing monitoring designed to identify behaviour inconsistent with legitimate commercial communications.

Assist Telecommunications has developed proprietary internal monitoring capabilities that support the identification of unusual traffic patterns across customer accounts. These controls include customer-specific usage thresholds, configurable call limits and internal analytics designed to identify anomalous traffic behaviour requiring further review.

The Company also utilises Cloudflare security services to enhance the security and resilience of its public-facing infrastructure and to assist in protecting customer-facing systems against malicious activity, unauthorised access attempts and network-based threats. In addition, Assist Telecommunications performs ongoing reviews of Call Detail Records (CDRs) and other operational information to identify patterns that may warrant investigation.

Indicators reviewed may include unusually high traffic volumes, unexpected increases in call frequency, irregular call distribution patterns, repeated failed call attempts, unusual geographic calling activity, excessive short-duration calls, sequential dialling behaviour, abnormal account usage, suspicious traffic spikes, unauthorised changes to customer configurations or any other activity inconsistent with the customer's expected operational profile.

Where monitoring systems identify suspicious activity, the Company may conduct further investigation, contact the customer for clarification, temporarily restrict services, request additional documentation, escalate the matter internally for compliance review or suspend telecommunications services pending completion of the investigation. These monitoring procedures form an ongoing component of Assist Telecommunications' broader fraud prevention and robocall mitigation programme and are regularly reviewed as the Company's services and technology continue to evolve.

IX. Traceback Cooperation Procedures

Assist Telecommunications recognises that timely and effective traceback investigations are essential to identifying the source of illegal robocalls and protecting the integrity of telecommunications networks.

The Company maintains documented internal procedures to ensure that traceback requests received from the Federal Communications Commission ("FCC"), the Industry Traceback Group ("ITG"), authorised law enforcement agencies or other competent regulatory authorities are handled promptly, consistently and confidentially.

Assist Telecommunications seeks to respond to legitimate traceback requests as promptly as operationally possible and aims to provide an initial substantive response within twenty-four (24) hours of receipt wherever reasonably practicable. The Company designates a dedicated Traceback Request Single Point of Contact, identified in Appendix A, responsible for coordinating all regulatory communications relating to robocall traceback investigations.

X. Upstream Provider Oversight

Assist Telecommunications delivers certain telecommunications services through carefully selected upstream carrier partners and recognises that effective upstream provider management is an important component of its overall robocall mitigation programme. Before engaging an

upstream telecommunications provider, the Company undertakes reasonable commercial and operational due diligence to assess the provider's legitimacy, reputation and suitability for supporting the Company's telecommunications services.

Assist Telecommunications maintains ongoing commercial relationships only with upstream providers that it reasonably believes operate in accordance with applicable telecommunications laws, industry standards and recognised fraud prevention practices.

The Company expects its upstream providers to maintain appropriate measures designed to detect and mitigate unlawful robocalls, caller ID spoofing and other forms of telecommunications fraud. Where commercially appropriate, Assist Telecommunications seeks to incorporate contractual obligations requiring cooperation with traceback investigations, compliance with applicable law and reasonable assistance in identifying the source of suspected unlawful traffic.

Where an upstream provider notifies Assist Telecommunications of suspected fraudulent or unlawful activity associated with customer traffic, the Company will investigate the matter promptly and take appropriate remedial action, which may include customer enquiries, enhanced monitoring, temporary traffic restrictions, suspension of services or termination of customer accounts where warranted. Information relating to the Company's principal upstream telecommunications provider is contained within Appendix A to this Plan.

XI. International Traffic

Where services involve international connectivity or the routing of international communications through authorised upstream providers, the Company applies the same customer due diligence, telephone number validation, contractual controls and fraud prevention measures described throughout this Plan.

Assist Telecommunications does not knowingly permit its services to be used for unlawful international robocalling campaigns, caller ID spoofing or fraudulent telecommunications activity involving North American numbering resources. Where international traffic presents elevated compliance risks, the Company reserves the right to implement additional verification procedures, enhanced monitoring, traffic restrictions or other reasonable mitigation measures consistent with applicable law.

XII. Continuous Monitoring and Improvement

Robocall mitigation is an ongoing operational responsibility rather than a one-time compliance exercise. Assist Telecommunications regularly reviews its internal policies, technical safeguards and operational procedures to ensure they remain appropriate for the Company's evolving telecommunications services, customer base and regulatory obligations.

The Company continually evaluates developments in telecommunications technology, fraud detection methodologies, industry best practices, STIR/SHAKEN implementation guidance and regulatory requirements issued by the FCC and other competent authorities. Where appropriate, Assist Telecommunications will enhance its monitoring capabilities, refine

customer due diligence procedures, strengthen contractual protections, implement additional technical safeguards and update this Robocall Mitigation Plan to reflect operational improvements or changes in applicable law.

The Company is committed to maintaining a culture of compliance, transparency and responsible network stewardship and will continue to invest in measures designed to reduce the risk of illegal robocalls originating from or being facilitated through its services.

XIII. Certification

Assist Telecommunications USA LLC certifies that it has implemented the reasonable measures described within this Robocall Mitigation Plan to reduce the risk of unlawful robocalls originating through its services.

The Company further certifies that it will cooperate fully with lawful traceback requests, maintain appropriate customer due diligence procedures, monitor its network for suspicious activity and continue to develop and improve its robocall mitigation programme in accordance with applicable regulatory requirements and recognised industry practices.

Appendix A

A. Traceback Request Single Point of Contact

Company: Assist Telecommunications USA LLC

Name: Kalyani Sharma

Title: Compliance Officer

Telephone: +1 762 254 3300

Email: legal@assist-telecom.com

B. Primary Upstream Telecommunications Provider

Provider: DIDWW

Nature of Business: Global telecommunications carrier providing Direct Inward Dialling (DID), SIP trunking, voice interconnection, numbering resources and related telecommunications infrastructure.

Email: customer.care@didww.com

Telephone: +1 (800) 825-5771

Assist Telecommunications maintains an ongoing commercial relationship with its upstream provider and cooperates, where appropriate, on matters relating to service integrity, fraud prevention, traceback investigations and compliance with applicable telecommunications regulations.