

Konci LLC

Robocall Mitigation Certification and Plan

August 2026

Objective

As a provider of AI-enabled voice and messaging services, Konci LLC is committed to protecting the integrity of the national telephone network and safeguarding consumers from fraudulent, abusive, or unauthorized calls. This document describes the technical and operational measures Konci LLC uses, or commits to implementing, to detect, prevent, investigate, and mitigate unlawful call traffic associated with its services.

Regulatory Compliance Statement

Konci LLC certifies and commits that:

- Calls originating, transiting, or terminating through services under Konci LLC's control are subject to this mitigation framework and applicable federal and state requirements.
- Konci LLC will maintain required regulatory certifications and will update its filings when material information changes.
- Konci LLC will provide a complete response within 24 hours to traceback inquiries from the Federal Communications Commission, law enforcement agencies, the Industry Traceback Group, or other authorized traceback organizations.
- Konci LLC will cooperate with regulators, law enforcement, traceback organizations, and telecommunications providers to identify and stop illegal robocallers using its services to originate calls.
- Konci LLC will enforce its acceptable use requirements and may restrict, suspend, or terminate service when activity presents an unreasonable risk of illegal, fraudulent, deceptive, or abusive calling.

Mitigation Strategies

1. Customer and Account Verification

Konci LLC requires customers to provide verifiable account and contact information during onboarding. Phone numbers and email addresses may be verified, and business information, payment details, device information, IP history, and other risk signals may be reviewed to distinguish legitimate activity from suspicious or fraudulent use.

Accounts presenting elevated risk may be subject to additional documentation, manual review, reduced calling privileges, delayed activation, or denial of service. Customers are responsible for maintaining accurate information and limiting account access to authorized users.

2. Secure Network Access

Konci LLC protects its internet-facing services through Cloudflare security controls, including Web Application Firewall protections, automated threat filtering, authentication requirements, and challenge-response mechanisms. Administrative access is restricted and logged, and higher-risk requests may be blocked or subjected to enhanced verification.

3. Traffic Rate Control

Konci LLC applies account-level and network-level limits to control the volume and velocity of outbound calls. Limits may vary according to account type, verification status, use case, complaint

history, and other risk factors. Sudden increases in traffic, repetitive dialing behavior, high complaint rates, or other anomalous patterns may trigger automated restrictions or manual review.

4. System Monitoring and Threat Detection

Konci LLC uses operational monitoring and alerting, including OneUptime and internal logging, to identify outages, abnormal traffic, security events, and suspected misuse. Relevant vulnerabilities and suspicious activity are reviewed and addressed promptly. Call-detail records, account events, and security logs are retained as reasonably necessary to investigate incidents and respond to authorized inquiries, subject to applicable privacy and retention requirements.

5. Incident Management and Response

Konci LLC collaborates with the Industry Traceback Group, the Federal Communications Commission, law enforcement, originating and terminating carriers, and other industry participants to investigate reports of unauthorized or unlawful calling. Reports received through automated systems, carrier notifications, customer complaints, or traceback requests are prioritized for review, with traceback inquiries receiving a complete response within 24 hours.

When credible evidence indicates that an account is being used for illegal robocalls, spoofing, fraud, or other prohibited activity, Konci LLC may immediately limit or suspend calling, preserve relevant records, request additional information, block associated identifiers, and terminate the account. Where appropriate, Konci LLC will notify its carrier partners or relevant authorities.

6. Data Analytics and Fraud Prevention

Konci LLC reviews available account and traffic data for indicators of misuse, including unusual call volume, rapid changes in dialing behavior, repeated short-duration calls, number rotation, excessive complaints, invalid caller identification, and other patterns associated with unlawful campaigns. The company may use internal analytics, carrier feedback, third-party risk signals, and manual review to assess and mitigate risk.

7. Employee Training and Compliance Awareness

Konci LLC maintains a training program to educate personnel on methods for preventing unlawful robocall traffic. Employees involved in customer onboarding, account review, support, operations, and incident response receive instruction on recognizing suspicious activity, enforcing acceptable use requirements, preserving relevant records, and handling traceback requests.

Konci LLC commits to providing a complete response within 24 hours to traceback inquiries from the Commission, law enforcement agencies, or the Industry Traceback Group. Konci LLC also commits to working with these organizations and its telecommunications partners to identify and stop illegal robocallers that use its services to originate calls.

8. Customer Terms and Enforcement

Konci LLC's customer and partner agreements prohibit use of its services for unlawful, fraudulent, misleading, harassing, or unauthorized calling. Customers are expected to obtain legally required consent, honor do-not-call obligations, use accurate caller identification, and comply with applicable telemarketing and artificial or prerecorded voice rules. Violations may result in immediate restriction, suspension, or termination of service.

Corporate Information and Key Personnel

Legal Entity: Konci LLC

Executive Leadership:

- Shaun Sanders - Chief Executive Officer
- Cody Kociemba - Chief Technology Officer

Principal Place of Business: 7975 N Hayden Rd Suite A210, Scottsdale, AZ 85258

Authorized Company Representative: Cody Kociemba, CTO

Affiliated Entities: None

Compliance Contact

For regulatory inquiries, traceback requests, or law-enforcement matters, please contact:

Contact Name: Cody Kociemba

Title: CTO

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