

ImpiricusHealth Corp. — Robocall Mitigation Program

Status: DRAFT — for legal / compliance review before PDF upload to the FCC Robocall Mitigation Database

Entity: ImpiricusHealth Corp.

FRN: 0038927067

Address: 5 Concourse Pkwy NE, Ste. 3100, Atlanta, GA 30328

Role: Voice Service Provider without a STIR/SHAKEN obligation

Outbound voice carriers: Third-party originating voice service providers (currently including Bandwidth Inc. and Twilio Inc.; may change over time)

Effective date: TBD

Robocall mitigation point of contact: Jenn Bridwell, SVP, Client Services — (678) 208-3627 — legal@impiricus.com

1. Purpose and scope

ImpiricusHealth Corp. (“Impiricus”) operates an HCP engagement platform that originates outbound voice campaigns to healthcare professionals. Campaigns may be run by Impiricus for its own purposes or in connection with life sciences / healthcare programs. Impiricus does not operate IP voice network facilities used to implement the STIR/SHAKEN authentication framework. Outbound U.S. voice traffic is originated onto the public switched telephone network by one or more third-party originating voice service providers (together, “Carrier Partners”). Current Carrier Partners include Bandwidth Inc. and Twilio Inc.; Impiricus may add, remove, or change Carrier Partners as its voice operations evolve.

This document describes Impiricus’s robocall mitigation program consistent with 47 CFR § 64.6305(a), including specific reasonable steps to avoid originating illegal robocall traffic and Impiricus’s commitment to respond to traceback requests within 24 hours.

2. STIR/SHAKEN status

Impiricus certifies that it has not implemented STIR/SHAKEN on any portion of its own network because it does not operate the IP voice network facilities necessary to do so. Applicable outbound traffic is authenticated by the relevant Carrier Partner on that

Carrier Partner's network in accordance with that Carrier Partner's obligations. Impiricus's lack of STIR/SHAKEN implementation does not reduce its duty to maintain this mitigation program or to cooperate with traceback and enforcement requests.

3. Know-your-customer / authorized-use measures

Impiricus does not offer open, self-serve dialing to the public, or to clients. Voice campaigns are configured and launched by authorized Impiricus personnel only. Impiricus takes affirmative steps so that outbound voice is limited to approved use cases:

1 Authorized operators. Only designated Impiricus personnel may set up and launch voice campaigns. Once Impiricus has set up the voice campaign, clients may originate calls through Impiricus's voice systems.

2 Authorized use. Voice campaigns are limited to legitimate HCP engagement and related communications permitted under Impiricus policies (including Impiricus-run campaigns and campaigns associated with life sciences / healthcare programs). Impiricus does not originate illegal robocalls, spoofing, or other unlawful telemarketing.

3 Campaign controls. Calling parameters (audience, messaging, schedule) are subject to Impiricus platform controls and internal review processes before launch, as applicable.

4 Consent / compliance. Impiricus is responsible for ensuring a lawful basis to contact intended recipients (including any required consent) for campaigns it originates, whether Impiricus-run or associated with a client program. Impiricus may refuse, suspend, or terminate any voice campaign that appears non-compliant or high-risk.

5 Ongoing oversight. Impiricus may disable numbers, pause campaigns, or stop voice traffic when it identifies policy violations or suspected illegal use.

4. Reasonable steps to avoid originating illegal robocall traffic

In addition to the controls above, Impiricus:

1 Restricts voice origination to Impiricus-controlled campaign workflows operated by authorized Impiricus personnel (not arbitrary third-party call injection).

2 Uses one or more Carrier Partners for network origination and relies on each Carrier Partner's network-level protections and traffic policies in addition to Impiricus's own controls.

3 Investigates reports of unwanted or illegal calling associated with Impiricus-originated numbers or campaigns.

4 Suspends or terminates campaigns or numbers when Impiricus reasonably believes traffic is illegal, fraudulent, or otherwise abusive.

5 Cooperates with the relevant Carrier Partner(s) on any traffic inquiries, remediation, or blocking related to Impiricus-originated calls.

5. Call analytics systems

Impiricus uses the following approaches to identify and address potentially illegal or abusive traffic:

System / process

Description

Platform campaign logging

Impiricus retains records of voice campaigns sufficient to identify the campaign, purpose/program, Carrier Partner used, timing, and related call metadata needed for investigation and traceback.

Carrier Partner analytics / network tools

Each Carrier Partner may apply analytics, monitoring, and traffic management on Impiricus's outbound traffic. Impiricus cooperates with Carrier Partner notifications and remediation requests.

Internal review / escalation

Suspected abuse is escalated to Rafay Chaudhary (robocall mitigation point of contact) for investigation and remediation.

6. Know-your-upstream-provider procedures

Impiricus does not accept voice traffic for origination from upstream carriers or intermediate providers. Impiricus-originated calls are generated through Impiricus's own platform by authorized Impiricus personnel and handed to a Carrier Partner for network

origination. Accordingly, Impiricus's "upstream" exposure is limited to its contractual relationships with its Carrier Partners (currently including Bandwidth Inc. and Twilio Inc.). Impiricus does not bridge third-party carrier traffic onto the PSTN.

7. Traceback commitment (24 hours)

Impiricus commits to respond **fully and within 24 hours** to all traceback requests from:

- the Federal Communications Commission;
- law enforcement; and
- the industry traceback consortium,

and to cooperate with such entities in investigating and stopping any illegal robocallers that use Impiricus's service to originate calls.

Operational process:

1 Traceback and related requests are directed to Rafay Chaudhary at rafay@impiricus.com or (706) 836-7846 (also listed as the robocall mitigation point of contact in Impiricus's Robocall Mitigation Database filing).

2 Upon receipt, Impiricus investigates using campaign and call records to identify the relevant campaign, program/purpose, and call details.

3 Impiricus provides a substantive response within 24 hours and takes appropriate remediation (including suspension or termination of campaigns, numbers, or traffic) when illegal use is identified.

4 Impiricus coordinates with the relevant Carrier Partner(s) as needed to complete traceback and remediation.

8. Point of contact

- Name: Jenn Bridwell
- Title: EVP, Client Services
- Department: Client Services
- Address: 5 Concourse Pkwy NE, Ste. 3100, Atlanta, GA 30328
- Telephone: (678) 208-3627
- Email: legal@impiricus.com

9. Program ownership and updates

This program is owned operationally by Impiricus Product / Engineering, with legal oversight for FCC Robocall Mitigation Database filings and material updates. Impiricus will update this description and its Robocall Mitigation Database filing within the timeframes required by FCC rules when material information changes (including material changes to Carrier Partners).