

LeadHunter USA LLC — Robocall Mitigation Plan

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Date: October 13, 2026

1. Our service

LeadHunter USA LLC provides a business phone line, used through its mobile app and website, to small, independent US home-service contractors (plumbers, roofers, handymen and similar trades). Each customer account receives one local US number, obtained from and carried by our upstream provider, Twilio Inc. Customers use it to answer calls from their own customers and to place individual, manually dialed calls to them. We do not offer, and our platform does not support, autodialing, bulk or campaign calling, pre-recorded or artificial-voice messages, or caller-ID selection.

2. Know-your-customer

Before a number is assigned to a customer:

- the customer creates an account with a verified email address and a US mobile phone number;
- the customer provides the legal business name, business address and, where they have one, an EIN; these details are submitted for carrier business registration through our upstream provider;
- a valid payment method is on file and the subscription is paid through Stripe; there is no free trial for the phone service;
- we accept US businesses only and refuse accounts whose stated business is not a local service trade.

We re-check these details whenever account ownership or business details change.

3. Technical controls on calling

- Caller ID is always the customer's own assigned number; it cannot be changed or spoofed by the customer.
- Outbound calls are placed one at a time by a person; we provide no API, number-list upload or scheduling for outbound calls.
- Outbound calling is limited to US and Canadian numbers; international and premium-rate destinations are blocked at the provider level.
- Each account is subject to a monthly usage limit and a daily limit on outbound calls, and to a limit on simultaneous calls.

4. Monitoring and enforcement

We monitor outbound calling per account for robocall indicators, including high daily call counts, a high share of very short calls, repeated calls to many unrelated numbers, and complaints. Accounts that match these patterns are suspended from outbound calling pending review. Accounts

confirmed to be making illegal or unwanted robocalls are terminated, and their numbers are released only after any open traceback is resolved. Our Terms of Service prohibit robocalls, telemarketing to numbers on the National Do Not Call Registry without an exemption, and any use that violates the TCPA or FCC rules; violation is grounds for immediate suspension.

5. Traceback and cooperation

We respond to traceback requests from the Industry Traceback Group, the FCC and law enforcement within 24 hours, using the contact above. We keep call detail records (calling number, called number, time, duration and account) for at least 12 months to support tracebacks. We cooperate fully with the Commission, law enforcement and our upstream provider, and we will block traffic from any account identified as a source of illegal robocalls.

6. Upstream provider and STIR/SHAKEN

We are a non-facilities-based provider. Our upstream provider, Twilio Inc., originates our customers' calls on its network, signs them under STIR/SHAKEN and applies its own robocall mitigation. We do not hold our own STIR/SHAKEN certificate.

7. Updates

We will update this certification within 10 business days of any material change and recertify annually by March 1.