

KYC / KYUP Questionnaire

Know Your Customer / Know Your Upstream Provider | Review copy

This copy lets you read every question before you apply. It is not a form: Hadlo only accepts applications through the online form, and the officer signs electronically through Dropbox Sign after the online form is submitted.

ANY INCOMPLETE ANSWERS WILL RESULT IN AUTOMATIC REJECTION

Requirements to do business with Hadlo

- An FCC Registration Number (FRN) that is at least two years old (Hadlo reads the registration date from FCC CORES).
- A listing in the FCC Robocall Mitigation Database (RMD) that has been recertified for the current year (due March 1).
- STIR/SHAKEN implemented, with an active STIR/SHAKEN certificate from an approved STI-CA whose SPC matches your OCN.

Step 1: Pre-qualification (short form)

Every field is required. "N/A", "None" or "Not applicable" are not accepted.

Company legal name

Exactly as registered with the state.

Contact name and title

Contact business email

We will email a one-time code to confirm it.

Contact business phone

E.164 format, for example +1 615 555 0100.

Current OCN (Operating Company Number)

4 characters, for example 074K. It must match the SPC in your STIR/SHAKEN certificate.

FCC Form 499 Filer ID

6 digits.

FRN (FCC Registration Number)

10 digits. Hadlo requires an FRN that is at least two years old.

RMD number (Robocall Mitigation Database)

For example RMD0001410. Your filing must be recertified for the current year.

STI-CA that issued your STIR/SHAKEN certificate

Date the company was formed

MM/DD/YYYY.

State (or country) of formation

STIR/SHAKEN certificate URL

The x5u URL in the Identity header of calls you sign. Your switch or signing vendor can give you this; it appears in the Identity header of every call you sign.

Consent

☐ I authorize Hadlo to verify this information with public and private databases.

Step 2: Full KYC/KYUP questionnaire

Sent after Hadlo reviews the pre-qualification. Answers from Step 1 are pre-filled. Enter 'N/A' only where a question allows it.

Section 0: Form Control

Form version / Hadlo Case ID: filled in by Hadlo.

1. Submission type

- ☐ New Customer
- ☐ Customer Renewal
- ☐ New Upstream Provider
- ☐ Upstream Renewal
- ☐ Triggered Re-verification

2. Relationship with Hadlo

- ☐ Hadlo terminates our traffic
- ☐ Hadlo sends us traffic
- ☐ Both

Date submitted (MM/DD/YYYY): filled in by Hadlo.

Section 1: Core Legal Identity

3. Legal entity name (exactly as registered with the state)

4. Other names / DBAs / trade names used by the company or its principals in the last 3 years

List all, or 'None'

5. Entity type

- ☐ Individual
- ☐ Partnership
- ☐ Corporation
- ☐ LLC
- ☐ Other

If you answer "Other", an explanation is required:

6. State / country of incorporation or formation

7. Date of incorporation / formation (MM/DD/YYYY)

8. Secretary of State business registration / entity number

9. FEIN / EIN (or foreign equivalent tax ID)

XX-XXXXXXX

10. FRN # (FCC Registration Number)

10 digits

11. Date FRN obtained (MM/DD/YYYY). Hadlo requires an FRN at least 2 years old (verified with the FCC)

12. FCC Section 214 authorization # (domestic and/or international)

Number, or 'None' with reason

13. FCC Form 499 Filer ID

6 digits

14. Is your most recent FCC Form 499-A filed and current?

☐ Yes

☐ No

If you answer "No", an explanation is required:

15. For Hadlo services, are you a USF contributor or a reseller?

☐ Contributor

☐ Reseller

☐ De minimis

☐ Other

If you answer "Other", an explanation is required:

16. CPNI annual certification filed with the FCC for the most recent year?

☐ Yes

☐ No

☐ N/A

If you answer "No", an explanation is required:

17. Is the company business based in the U.S.?

- ☐ Yes
☐ No

If you answer "No", an explanation is required:

18. Affiliated with any NON-U.S. entity owning more than 10%? (If YES: entity, % ownership, country)

- ☐ Yes
☐ No

If you answer "Yes", an explanation is required:

19. Foreign customers only: country licensed in and foreign registration number

Enter 'N/A' if U.S. company

20. Registered U.S. agent (name and address), if any

Enter 'N/A' if none

21. Is the company, a parent, or any 10%+ owner owned by, controlled by, or subject to the jurisdiction or direction of a foreign adversary (as defined by the FCC, FCC 26-2)?

- ☐ Yes
☐ No

If you answer "Yes", an explanation is required:

22. Is the company or any affiliate on the FCC Covered List?

- ☐ Yes
☐ No

If you answer "Yes", an explanation is required:

23. How many years has the company actually operated voice services, and what did the entity do before that?

24. Any change of ownership or control in the last 3 years? (If YES: details and dates)

- ☐ Yes
☐ No

If you answer "Yes", an explanation is required:

Section 2: Physical and Equipment Locations

25. Physical business address: street, suite, city, state, ZIP (real place of business; NO virtual office, P.O. Box, mail forwarding, registered agent, hosted server location, or shared space without a dedicated suite/floor)

26. Is the physical address a residence?

☐ Yes

☐ No

If you answer "Yes", an explanation is required:

27. Number of officers physically located in the U.S. who work at the listed physical address

28. Total employees, and the countries where they are located

e.g., 12 (USA 10, Canada 2)

29. Physical address of switching / network equipment (data center, cage/rack)

30. Contact name and phone at the equipment location

31. Mailing address (if different from physical)

Enter 'Same' if the same

32. IP ranges / ASN you will send traffic from, and the country of those IPs

Section 3: Contact Information

33. Customer main phone

34. Customer fax

Optional

35. Company website URL

36. Primary contact: name and title

37. Primary contact: phone and email

38. Primary main email

Company domain only

39. Billing / accounting email

Company domain only

40. Support / NOC email

Company domain only

41. Legal email

Company domain only

42. Compliance email

Company domain only

43. Fraud report email

Company domain only

44. Rates email

Company domain only

45. 24/7 traceback contact: name, phone, email (FCC requires traceback response within 24 hours)

46. 24/7 NOC phone number

47. Are ALL emails above on your company domain (no Gmail, Yahoo, Hotmail, Outlook, etc.)?

☐ Yes

☐ No

If you answer "No", an explanation is required:

Section 4: References and Provider History

48. Provider references: complete the 'References & Carriers' tab (2 references required)

Answered by completing the matching table later in this form.

49. Current carriers you buy from / terminate with: complete the 'References & Carriers' tab (at least 2)

Answered by completing the matching table later in this form.

50. In the last 2 years, has any provider refused, suspended, put on probation, or terminated service to you, your affiliates, or other companies run by your principals? (If YES: provider, date, reason)

☐ Yes

☐ No

If you answer "Yes", an explanation is required:

Section 5: Business Description and Use Cases

51. Business type (select all that apply)

☐ VoIP

☐ Hosted PBX

☐ International

☐ Call Center

☐ Wholesale/Transit

☐ UCaaS

☐ CPaaS

☐ Other (describe)

Select all that apply.

52. If business type is Other, describe in detail

Enter 'N/A' if not Other

53. Primary use case(s) of traffic (select all; describe each)

☐ Marketing/Sales

☐ Political

☐ Educational/Non-profit

☐ Customer Service

☐ Healthcare

☐ Financial

☐ Emergency/Public Safety

☐ International Termination

☐ Debt Collection

☐ Lead Generation

☐ Other (detail)

Select all that apply.

54. High-risk verticals you or your customers serve (select all, or 'None')

☐ Affiliate marketing/lead generation

☐ Payday loans, debt relief, credit repair

☐ Auto/home warranties

☐ Third-party debt collection

☐ Political, fundraising, surveys

☐ Tech support

☐ Solar

☐ For-profit education

☐ Medicare/health insurance

☐ None

Select all that apply.

55. Types of customers you serve, number of customers, and % of traffic by type (enterprise, reseller, carrier, call center)

56. Do you resell to other providers (your upstream providers)?

☐ Yes

☐ No

If you answer "Yes", an explanation is required:

57. If YES above: how many upstream providers, and do ALL of them have current RMD filings?

Enter 'N/A' if No

58. Expected monthly minutes

59. Expected peak concurrent channels

60. Expected peak CPS (calls per second) and peak hour (with time zone)

61. Do you use any non-IP (TDM/SS7) technology anywhere in your network?

☐ Yes

☐ No

If you answer "Yes", an explanation is required:

62. Will you send foreign-originated traffic? (If YES: top 5 origin countries by volume)

☐ Yes

☐ No

If you answer "Yes", an explanation is required:

63. For autodialed, prerecorded, or telemarketing calls: describe how consent is collected and documented (sample scripts must be available on request)

Enter 'N/A' if none

64. Where do you get phone numbers (NANPA/PA directly, carriers, both)? Any numbering restrictions, suspensions, or reclaims against you?

Section 6: Regulatory Registrations and STIR/SHAKEN

65. Company name registered in the Intermediate Provider Registry and registration number

Enter 'Not registered' if none

66. Is the company listed in the Intermediate Provider Registry? (https://fccprod.servicenowservices.com/ipr_ext)

☐ Yes

☐ No

67. OCN associated with your STIR/SHAKEN header

4 characters

68. Additional OCNs associated with the company

Enter 'None' if none

69. Robocall Mitigation Database (RMD) number

RMD#####

70. URL link to your RMD filing

71. Have you completed the RMD annual recertification for the current year (due March 1 each year)?

☐ Yes

☐ No

If you answer "No", an explanation is required:

72. RMD certification type

☐ Complete STIR/SHAKEN

☐ Partial STIR/SHAKEN

☐ Robocall mitigation only (exemption)

If you answer "Robocall mitigation only (exemption)", an explanation is required:

73. Do you update RMD and CORES within 10 business days of any change?

☐ Yes

☐ No

If you answer "No", an explanation is required:

74. Have you emailed a copy of your current Robocall Mitigation Plan to compliance@hadlotechnologies.com AND uploaded it (Document D06)?

☐ Yes

☐ No

If you answer "No", an explanation is required:

75. SPC token status

- ☐ Active
☐ Revoked
☐ Never obtained

If you answer "Never obtained", an explanation is required:

76. Date SPC token was first issued (MM/DD/YYYY)

77. STI-CA (certificate authority) used, and certificate expiration date

78. Is the company currently ONLY passing calls with STIR/SHAKEN?

- ☐ Yes
☐ No

If you answer "No", an explanation is required:

79. Do you sign ALL calls with YOUR OWN certificate and make ALL attestation decisions yourself (required since Sept 18, 2025)? If a vendor signs for you, name the vendor in the details.

- ☐ Yes
☐ No

If you answer "No", an explanation is required:

80. Confirm you are NOT signing third-party calls with a third party's certificate (see 'Attestation Reference' tab)

- ☐ Yes
☐ No

If you answer "No", an explanation is required:

81. If a vendor signs calls for you, do you have a written agreement that the vendor uses your certificate and your attestation decisions?

- ☐ Yes
☐ No
☐ N/A

If you answer "No", an explanation is required:

82. Your attestation mix: % A / % B / % C, and % of traffic that arrives already signed

e.g., A 70% / B 25% / C 5%; 95% arrives signed

83. Do you pass the Identity header unaltered on all calls?

- ☐ Yes
☐ No

If you answer "No", an explanation is required:

84. Do you fully support SIP 603+ for blocked-call notification (FCC deadline March 24, 2026) and map it to ISUP cause 21 where applicable?

- ☐ Yes
☐ No

If you answer "No", an explanation is required:

85. Do you support Rich Call Data / branded calling? (informational)

- ☐ Yes
☐ No

86. Do you use third-party call analytics? (If YES: vendor names)

- ☐ Yes
☐ No

If you answer "Yes", an explanation is required:

87. STIR/SHAKEN certificate URL (the x5u URL in the Identity header of calls you sign). Hadlo verifies the certificate is valid, from an approved STI-CA, and carries your OCN

Pre-filled from Stage 1 (<https://...>)

Section 7: Traffic Characteristics and Gateway Status

88. Does the company originate or process conversational traffic?

- ☐ Yes
☐ No

89. Does the company originate or process autodialed call traffic?

- ☐ Yes
☐ No

If you answer "Yes", an explanation is required:

90. Does the company have any direct autodial clients?

- ☐ Yes
☐ No

If you answer "Yes", an explanation is required:

91. Are any sources of traffic (autodialed or not) from non-U.S. clients?

- ☐ Yes
☐ No

If you answer "Yes", an explanation is required:

92. Are you a Gateway Provider (entry point for foreign calls into the United States)?

- ☐ Yes
☐ No

93. Gateway Providers: do you sign all unsigned foreign-originated calls and meet gateway KYUP rules?

- ☐ Yes
☐ No
☐ N/A

If you answer "No", an explanation is required:

94. Do you refuse traffic directly from any provider that is not in the RMD?

- ☐ Yes
☐ No

If you answer "No", an explanation is required:

Section 8: ITG / Traceback / Enforcement History (last 12 to 24 months)

95. Is the company actively engaged in the ITG traceback process?

- ☐ Yes
☐ No

If you answer "No", an explanation is required:

96. Total number of ITG traceback reports received (all types)

Enter 0 if none

97. Originator or U.S. point of entry for MORE than 3 tracebacks or notifications in the last year?

- ☐ Yes
☐ No

If you answer "Yes", an explanation is required:

98. Originator or U.S. point of entry for more than 3 tracebacks for calls falsely claiming to be a government agency (SSA, IRS, etc.)?

- ☐ Yes
☐ No

If you answer "Yes", an explanation is required:

99. Any fraud ITG ticket in the last year?

- ☐ Yes
☐ No

If you answer "Yes", an explanation is required:

100. If YES above: total number of fraud ITG tickets

Enter 0 if none

101. Ever failed to respond to a traceback request within 24 hours?

☐ Yes

☐ No

If you answer "Yes", an explanation is required:

102. Ever determined to be a 'Non-Cooperative Voice Service Provider' or 'Non-Responsive' by the ITG?

☐ Yes

☐ No

If you answer "Yes", an explanation is required:

103. Blocked or removed from any service provider's network in the last two years?

☐ Yes

☐ No

If you answer "Yes", an explanation is required:

104. Ever received an FCC Cease-and-Desist letter, NAL, Forfeiture Order, Consent Decree, Final Determination Order, or RMD removal / show-cause order?

☐ Yes

☐ No

If you answer "Yes", an explanation is required:

105. Has the company, its predecessor(s), parent/affiliate(s), principal(s)/controlling person(s), or any other company where those persons served in the last 5 years, been subject to an adverse civil judgment relating to telecommunications networks, or any law enforcement action or investigation by any local, state, or federal agency?

☐ Yes

☐ No

If you answer "Yes", an explanation is required:

106. Ever received a State Attorney General Anti-Robocall Task Force letter, subpoena, or Civil Investigative Demand?

☐ Yes

☐ No

If you answer "Yes", an explanation is required:

107. Have any of your customers originated unlawful robocalls in the last 2 years? (If YES: what action did you take?)

☐ Yes

☐ No

If you answer "Yes", an explanation is required:

108. Has the company had an FCC license revoked, or numbering resources suspended or reclaimed?

☐ Yes

☐ No

If you answer "Yes", an explanation is required:

Section 9: Compliance Policies and Lists

109. Confirm you will use the required Do Not Originate (DNO) list

☐ Yes

☐ No

If you answer "No", an explanation is required:

110. Which DNO list is used?

111. Do you have an Acceptable Use Policy (AUP)?

☐ Yes

☐ No

If you answer "No", an explanation is required:

112. URL to AUP (also upload as Document D08)

113. Will you use a Do Not Call (DNC) list? Which ones (National, internal, state)?

☐ Yes

☐ No

114. Describe your own KYC process for your customers (what you collect, how you verify)

115. Describe your own KYUP process for your upstream providers

Enter 'N/A' if no upstream providers

116. Do your contracts with customers and upstream providers specifically require KYC/KYUP and traceback cooperation (not just 'comply with all laws')?

☐ Yes

☐ No

If you answer "No", an explanation is required:

117. How do you monitor traffic (analytics, short-duration %, ASR, invalid ANI, DNO hits), and what thresholds trigger action?

118. How do you validate number ownership / prevent caller ID spoofing (e.g., LOA on file for A attestation)?

119. Do you keep KYC records and CDRs for at least 4 years?

☐ Yes

☐ No

If you answer "No", an explanation is required:

120. CALEA System Security and Integrity (SSI) plan filed, if required?

☐ Yes

☐ No

☐ N/A

If you answer "No", an explanation is required:

Section 10: Estimated Traffic Quality Metrics

121. Estimated ASR %

e.g., 45%

122. Estimated ALOC (seconds)

123. Estimated 6xx global code rejections %

124. Estimated unallocated 404 %

125. Estimated cancel / 487 %

126. Channel-to-CPS ratio requested (e.g., 20:1)

127. Estimated short-duration % (calls under 6 seconds)

128. Expected destination mix (% U.S. 48 states, AK/HI, Canada, toll-free, international)

Section 11: Ownership, Principals, Beneficial Owners and Affiliates

129. Complete the 'Principals & Owners' tab for EVERY principal, officer, director, leader, authorized representative, and every person with 10% or more direct or indirect ownership

Answered by completing the matching table later in this form.

130. If any owner is a company, have you traced ownership up the chain to natural persons on the 'Principals & Owners' tab?

☐ Yes

☐ No

If you answer "No", an explanation is required:

131. Complete the 'Affiliates' tab for all parents, subsidiaries, and affiliates

Answered by completing the matching table later in this form.

132. Any Politically Exposed Persons (PEPs) or sanctions matches among principals or owners?

☐ Yes

☐ No

If you answer "Yes", an explanation is required:

133. Organizational chart uploaded (Document D07)?

☐ Yes

☐ No

If you answer "No", an explanation is required:

Section 12: Financial and Commercial Presence

134. Billing address

135. Form of payment

☐ ACH

☐ Wire

☐ Credit card

☐ Other

If you answer "Other", an explanation is required:

136. Bank name, bank country, and account holder name (must match legal entity name)

137. Prepaid or postpaid requested? Credit limit requested?

138. Website, social media, and app URLs (screenshots uploaded as Document D11)

139. Industry presence: associations, trade shows, conferences

Enter 'None' if none

Section 13: Ongoing Commitments

140. We will notify Hadlo of any material change (ownership, address, RMD, SPC token, business type, traffic type) within 10 business days

☐ Yes

☐ No

If you answer "No", an explanation is required:

141. We agree to annual re-verification and to re-verification whenever Hadlo identifies red flags

☐ Yes

☐ No

If you answer "No", an explanation is required:

142. We will respond to Hadlo and ITG traceback requests within 24 hours

☐ Yes

☐ No

If you answer "No", an explanation is required:

143. We acknowledge Hadlo may block or suspend traffic without notice for illegal traffic, RMD removal, SPC token revocation, Covered List / foreign adversary listing, or regulatory demand

☐ Yes

☐ No

If you answer "No", an explanation is required:

144. We consent to Hadlo reporting to the FCC Enforcement Bureau, the ITG, and law enforcement

☐ Yes

☐ No

If you answer "No", an explanation is required:

145. We authorize Hadlo to verify all information with public and private third-party sources

☐ Yes

☐ No

If you answer "No", an explanation is required:

Principals, Officers, Directors, Leaders and Owners (10% or more, direct or indirect)

One row per person. Trace any company owner up the chain to natural persons. Upload each person's government photo ID (Document D01).

One entry per person, with no limit on the number of people. Each person uploads a government photo ID (document D01).

Person 1

Full Legal Name

Title / Role

% Ownership (direct or indirect)

Owned Through (entity, if indirect)

Date of Birth (MM/DD/YYYY)

Citizenship

Country of Residence

Residential Address

Work Address

Business Phone

Business Email

Gov. ID Type

Gov. ID Number

Other Telecom Companies Owned or Managed (last 5 years)

PEP or Sanctions Match? (Yes/No)

Person 2

Full Legal Name

Title / Role

% Ownership (direct or indirect)

Owned Through (entity, if indirect)

Date of Birth (MM/DD/YYYY)

Citizenship

Country of Residence

Residential Address

Work Address

Business Phone

Business Email

Gov. ID Type

Gov. ID Number

Other Telecom Companies Owned or Managed (last 5 years)

PEP or Sanctions Match? (Yes/No)

Parents, Subsidiaries and Affiliates

Enter 'None' in row 1 if there are none.

☐ None

Affiliate 1

Legal Name

DBAs / Trade Names

Relationship

Place of Incorporation

Principal Place of Business

% Ownership

FRN

RMD #

Telecom Services? (Yes/No)

Notes

Affiliate 2

Legal Name

DBAs / Trade Names

Relationship

Place of Incorporation

Principal Place of Business

% Ownership

FRN

RMD #

Telecom Services? (Yes/No)

Notes

Provider References and Current Carriers

Reference (required)

Company Name

Contact Name

Contact Phone

Contact Email

Relationship Length (years)

Services Purchased / Provided

Reference (required)

Company Name

Contact Name

Contact Phone

Contact Email

Relationship Length (years)

Services Purchased / Provided

Current carrier (required)

Company Name

Contact Name

Contact Phone

Contact Email

Relationship Length (years)

Services Purchased / Provided

Current carrier (required)

Company Name

Contact Name

Contact Phone

Contact Email

Relationship Length (years)

Services Purchased / Provided

Current carrier (optional)

Company Name

Contact Name

Contact Phone

Contact Email

Relationship Length (years)

Services Purchased / Provided

Current carrier (optional)

Company Name

Contact Name

Contact Phone

Contact Email

Relationship Length (years)

Services Purchased / Provided

Document checklist

Upload PDF, JPG or PNG files in the online form.

- ☐ Government-issued photo ID for every individual on the 'Principals & Owners' tab
- ☐ Formation documents (articles of organization / incorporation)
- ☐ Certificate of Good Standing (no more than 6 months old)
- ☐ IRS EIN confirmation letter (CP 575 or 147C)
- ☐ Lease or utility bill confirming physical address (no more than 90 days old)
- ☐ Robocall Mitigation Plan (current)
- ☐ Organizational chart / ownership structure
- ☐ Acceptable Use Policy (AUP)
- ☐ Most recent FCC Form 499-A (first page)
- ☐ Bank reference letter or voided check
- ☐ Website / social media screenshots
- ☐ Sample customer contract or terms showing KYC and traceback clauses
- ☐ Proof of SPC token / STI-CA certificate (screenshot)
- ☐ Any other documents requested after Hadlo's initial review (if requested)

STIR/SHAKEN Reference (read-only)

The below is NOT intended as legal advice and is ONLY placed here for proper guidelines and expectations. When attesting 'A', Hadlo may request to review your KYC and LOA.

A: Full Attestation

What the Originating Carrier Asserts: "This is my customer, and I assigned/verified them this exact phone number." The carrier has a direct relationship with the caller and has confirmed the caller is authorized to use that specific TN.

Trust Level / Risk: Highest (lowest risk)

Typical Use Case / Requirements: Direct retail customers or enterprises using numbers provisioned by the carrier. Requires full KYC + number authorization (e.g., Letter of Authorization on file).

B: Partial Attestation

What the Originating Carrier Asserts: "This is my customer, but I did not assign/verify this phone number." The carrier knows the caller's identity but cannot confirm the caller's right to use the displayed number.

Trust Level / Risk: Medium

Typical Use Case / Requirements: Known business customers or resellers where the carrier has authenticated the person/entity but not the number association.

C: Gateway Attestation

What the Originating Carrier Asserts: "I have no knowledge of the caller or number origin; I'm just passing the call through."

Trust Level / Risk: Lowest (highest risk)

Typical Use Case / Requirements: International gateways, unauthenticated traffic, TDM-to-IP conversions, or calls from unknown upstream sources. Often triggers heavy scrutiny or blocking.

Rule in force since September 18, 2025: no signing third-party calls with third-party certificates

The FCC's Eighth Report and Order on Call Authentication (FCC 24-120) prohibits prior third-party authentication practices that allowed loose signing of unaffiliated traffic.

- Voice service providers must sign all their calls using their own certificate (not a third party's certificate).
- The provider with the STIR/SHAKEN obligation must make the attestation-level decisions itself.
- The technical act of signing may be outsourced to a vendor only if the vendor uses the provider's own certificate and follows the provider's attestation decisions, under a written agreement.
- In practice, carriers may not sign 3rd-party calls (traffic from unaffiliated resellers, enterprises, or upstream providers) using someone else's certificate or without full accountability.

Certification (Under Penalty of Perjury)

The undersigned affirms and certifies that all information and answers to questions herein are complete, true and correct to the best of the signatory's knowledge and belief. The undersigned confirms understanding that should the nature of the Company's business change, including to involve telemarketing or robocall traffic in the future where not indicated herein currently, the Company is responsible for informing Hadlo Technologies in order to update the KYC/KYUP certification. The undersigned confirms that blocking of customer traffic may occur as a result of the customer failing to provide notice of material updates to its KYC/KYUP certification, demonstrated illegal/fraudulent traffic, customer delisting in the Robocall Mitigation Database, otherwise required by regulatory or law enforcement agencies, or otherwise provided by the agreement with the customer.

The undersigned certifies that the undersigned is an officer of the Company, and that the Company has knowledge of the U.S. laws prohibiting the generation and transmission of illegal, harassing or otherwise unwanted voice calls, and also confirms that the Company complies with these laws and consents to disclose all details if questions arise regarding potential violations of these laws. The undersigned states that the Company is aware of the communications industry Traceback group (ITG) in the United States and certifies that the Company will respond promptly to all Traceback requests and take effective actions to address any illegal traffic transmitted on its network.

The undersigned further affirms that the Company requires its upstream customers to cooperate with the industry Traceback group and makes all reasonable efforts to ensure that its upstream traffic sources are familiar with laws prohibiting the generation and transmission of illegal, harassing or otherwise unwanted voice calls.

The undersigned authorizes Hadlo Technologies to verify any information provided herein with public and private third-party sources.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Officer details collected in the online form: Printed Name of Officer, Officer Title, Officer Telephone, Officer Email.

Signature is collected electronically through Dropbox Sign after the online form is submitted.

FOR REVIEW ONLY: NOT FOR SIGNATURE
OR SUBMISSION