Acceptable Use Policy

Traffic Integrity, Robocall Mitigation & Enforcement

Gradient Solar Systems LLC (d/b/a Connectivity King and GradCon Intl LLC)

1. PURPOSE AND SCOPE

This Acceptable Use Policy ("AUP") governs all voice traffic originated, transported, or terminated by Gradient Solar Systems LLC ("GSS") and by any customer using GSS network resources, including its hosted dialer platform. This AUP forms part of the terms of service binding on every GSS customer, and use of GSS services constitutes acceptance of it. Customers are also required to execute GSS's Master Services Agreement. This AUP is enforced at both the contractual and network levels.

GSS operates in compliance with the Telephone Consumer Protection Act (TCPA), the FTC Telemarketing Sales Rule (TSR), the TRACED Act, and applicable FCC rules governing caller ID authentication and robocall mitigation. GSS is registered in the FCC Robocall Mitigation Database (RMD0015492) and files FCC Form 499 (Filer ID 836461).

2. PROHIBITED TRAFFIC

The following are strictly prohibited on the GSS network. Any customer found originating such traffic is subject to immediate suspension and permanent termination:

- Illegal robocalling, including automated calls delivering prerecorded messages to consumer telephone numbers without valid prior express consent.
- Calls to any number listed on the National Do Not Call Registry absent an applicable exemption or documented consent.
- Caller ID spoofing, including the transmission of misleading or inaccurate caller identification information with intent to defraud, cause harm, or wrongfully obtain anything of value.
- Calls originating from telephone numbers the customer does not own or is not authorized to use.
- Calls using numbers that appear on Do Not Originate (DNO) lists, including invalid, unallocated, unassigned, or government-designated numbers.
- Any campaign impersonating a government agency, financial institution, utility, or other entity for the purpose of defrauding a called party.
- Traffic pumping, access stimulation, or any scheme designed to artificially inflate call volumes or intercarrier compensation.
- Any traffic that violates applicable federal, state, or international law.

3. PREVENTIVE NETWORK CONTROLS

GSS applies the following controls at the network level:

- **DNC Filtering.** Do Not Call filtering is applied at the switch level using lists maintained by GSS. Calls to listed numbers are blocked absent a documented exemption or consent record.
- **DNO Filtering.** Do Not Originate list filtering is applied at the switch level to block calls originating from invalid, unallocated, unassigned, or protected number ranges.
- **STIR/SHAKEN Caller ID Authentication.** GSS has implemented the STIR/SHAKEN framework. For its direct customers, GSS signs calls at the attestation level each call qualifies for under the STIR/SHAKEN standards. Full (A) attestation is applied only where GSS has a direct, authenticated relationship with the customer and has verified the customer's authorization to use the calling number; otherwise, the appropriate lower attestation level is applied.
- **Wholesale and Reseller Traffic.** Wholesale and reseller customers must hold their own STIR/SHAKEN SPC token and certificate. Their calls are signed with the customer's own token, either by the customer or by GSS on the customer's behalf. GSS never signs wholesale or reseller traffic with its own token.
- **Traffic Pattern Monitoring.** GSS continuously monitors call volume, duration, completion ratios, and dialing patterns for indicators consistent with illegal or abusive calling activity.

4. CUSTOMER VETTING AND ONBOARDING

GSS screens and verifies all prospective customers before provisioning. Onboarding requires, at minimum: completion of GSS's Know Your Customer (KYC) form; verification of legal business identity and registration; identification of the intended campaign types and calling purpose; confirmation of the customer's consent-capture and record-retention practices; and execution of GSS's Master Services Agreement and acceptance of this AUP, which expressly prohibit the conduct described in Section 2.

Customers are contractually obligated to maintain records substantiating prior express consent for all calls placed and to produce such records to GSS upon request.

5. TRACEBACK RESPONSE PROCEDURE

GSS responds promptly to all traceback requests, including those issued by the USTelecom Industry Traceback Group (ITG), law enforcement, and other carriers. Upon receipt of a traceback notification, GSS will:

- Acknowledge and respond to the request within twenty-four (24) hours.
- Identify the originating customer responsible for the traffic through call detail records and platform logs.

- Provide the requesting party with the identifying information of the responsible customer, including legal entity name, contact information, and the associated campaign and call detail records.
- Immediately block the offending traffic and suspend the customer's access pending investigation.

6. ENFORCEMENT AND PERMANENT TERMINATION

GSS enforces a zero-tolerance standard for illegal traffic. Where a customer is confirmed to be the source of traffic identified in a traceback or otherwise determined to be illegal, GSS will:

- Immediately and permanently terminate the customer's account and all associated services.
- Permanently bar the customer, its principals, and its affiliated entities from obtaining service from GSS in the future.
- Retain and preserve all relevant call detail records and account documentation for production to regulators, law enforcement, or carriers.
- Notify affected carriers of the action taken.

GSS reserves the right to suspend or terminate any traffic or customer account at its sole discretion, without prior notice, where GSS reasonably believes the traffic violates this AUP or applicable law.

7. CONTACT

Compliance and traceback inquiries should be directed to:

Matthew Yeazel, Owner — Compliance Contact
Gradient Solar Systems LLC — 42060 Taylor St, Murrieta, CA 92562
Network Operations (Escalation): **Mehran Khan** — noc@gradconintl.com
Telephone: (888) 885-4202