

**Air Voice Wireless, LLC**  
**COMPLIANCE**  
**PROGRAM**

**April 2024**

## **I. INTRODUCTION**

Air Voice Wireless, LLC (“Company”) provides wireless and broadband services to participates in the Federal Communications Commission’s (“FCC”) Lifeline Program and Affordability Connectivity Program (“ACP”), which provide discounted services for low-income Americans. The Company’s mission is to provide dependable, affordable service to its customers and to do so in a manner that is lawful, honest, and ethical. To ensure the Company and its employees meet our expectations regarding lawful, honest, and ethical behavior, the Company has established and adopted this comprehensive compliance program.

## **II. OVERVIEW OF COMPLIANCE PROGRAM**

### **A. Objectives and Goals**

The Company’s policy and objective are to conduct its business operations in compliance with all applicable federal and state laws and regulations, including the rules governing the Lifeline Program and ACP, and to maintain an effective compliance program to monitor such compliance. The Compliance Program’s goals include (1) establishing within the Company a culture of compliance that promotes prevention, detection, and resolution of instances of misconduct; (2) articulating and demonstrating the Company’s commitment to compliance, including from the highest levels within the Company; (3) eliminating or reducing potential damage to the reputation and goodwill of the Company; (4) educating and informing all employees of the importance of compliance; (5) reducing or minimizing potential exposure to civil, criminal, or regulatory enforcement actions; (6) providing employees a conduit through which to report, without fear of retaliation, potential misconduct; and (7) establishing a method for investigating suspected misconduct. This Compliance Program formalizes the Company’s compliance objectives and goals.

### **B. Essential Elements**

The Company recognizes that its compliance plan must be tailored to the nature of the Company’s business, the regulatory environment in which it operates, the needs of individual employees, and changing and evolving issues. The Company, however, is committed to ensuring that its Compliance Program adheres to the fundamental elements of a corporate compliance program as defined by the U.S. Department of Justice and the federal sentencing guidelines. The Company’s compliance program is designed to include the following essential elements:

1. Compliance Program Administration: The designation of a compliance officer charged with the responsibility of implementing, operating, and monitoring the compliance program.
2. Standards, Policies, and Procedures: A written code of conduct, policies, and procedures that promote the Company’s commitment to compliance and that address applicable laws and regulations.
3. Education and Training: An education and training program to ensure employees understand the Company’s compliance program and their obligations to comply with its requirements.

4. Auditing and Monitoring: A system and schedule for auditing and monitoring Company activities and employee conduct.
5. Internal Reporting Systems: A process for employees to report suspected violations of law, regulations, and the compliance program, and procedures to protect the anonymity of complainants and to protect whistleblowers from retaliation.
6. Investigations and Remediation: A system to respond to, investigate, and remediate conduct or activities that violate internal compliance policies or applicable laws and regulations.
7. Disciplinary Guidelines and Procedures: Policies and procedures outlining disciplinary processes and consequences for engaging in conduct in violation of the law or the compliance program.

### **III. COMPLIANCE OFFICER**

The Company's Compliance Officer shall have day-to-day operational responsibility for the Compliance Program and shall have the authority and resources necessary to carry out his/her responsibilities. The Compliance Officer's primary responsibilities include:

- Designing, implementing, and administrating the compliance program;
- Reporting on a regular basis to the organization's governing body and executives;
- Developing written compliance policies and procedures;
- Assessing the effectiveness of the compliance program and revising the program periodically, as appropriate;
- Developing, coordinating, and participating in the educational and training program;
- Serving as a source of information for employees, management, agents, and the board;
- Assisting with internal compliance review and monitoring activities;
- Independently investigating and acting on compliance-related matters; and
- Assessing risk areas and working with management to prioritize risk and develop mitigation plans.

In discharging these duties and responsibilities, the Compliance Officer shall have full authority to access and review all documents and other information relevant to compliance activities.

#### IV. STANDARDS, POLICIES, AND PROCEDURES

The Company shall establish written compliance standards, policies, and procedures to prevent and detect conduct that violates the Company's obligation to comply with applicable laws and regulations or its commitment to conduct business in an honest and ethical manner. These written policies and procedures shall be distributed to or otherwise made available to Company employees.

##### A. Code of Conduct

The Company shall develop and adopt a Code of Conduct. The Code of Conduct reflects the Company's expectation that all employees act in an ethical manner and abide by all applicable laws and regulations. The Code of Conduct provides guidance for appropriate conduct and describes how employees can seek answers to questions or report concerns they have about the conduct of the Company or other employees. All employees are required to acknowledge that they have read and understand the Conduct of Conduct and will abide by it.

##### B. Lifeline and ACP—Compliance Manual, Policies, and Procedures

As a participant in the FCC's Lifeline Program and ACP, the Company and its employees must comply with applicable FCC rules, regulations, and guidance. The Company shall develop a Compliance Manual explaining the FCC's Lifeline and ACP rules and the Company's policies and procedures that employees and agents must follow to help ensure the Company's compliance with the Lifeline and ACP rules. In addition, the Company shall adopt the following written Lifeline and ACP policies and procedures:

<u>Lifeline</u>	<u>ACP</u>
Customer Eligibility Policy	ACP Wind-Down Policy
Eligibility Verification Policy	Sales & Marketing Policy
Duplicative Support Policy	Customer Registration & Verification Policy
Sales & Marketing Policy	Provision of Service Policy
Reimbursement & Charges Policy	Termination of Service Policy
Annual Certification Policy	Annual Subscriber Recertification Policy
Annual Report Policy	Subscriber De-Enrollment Policy
Low Income Program Audits Policy	Reimbursement for Service & Devices Policy
Emergency Communications Support Policy	Annual Reporting & Certification Policy
Recordkeeping Policy	Recordkeeping Policy

The Compliance Manual and above-referenced policies and procedures are appended hereto as Attachments \_\_\_ and \_\_\_, respectively. The Company shall distribute and otherwise make available to all employees and agents the Compliance Manual. The Company shall periodically, but not less than annually, review and revise the Compliance Manual and Lifeline and ACP policies and procedures as necessary to ensure that the information contained therein remains current and accurate.

## **V. EDUCATION AND TRAINING**

All employees and agents shall be required to complete compliance training on an annual basis. Employees and agents shall complete the compliance training within thirty (30) days of hire. The compliance training shall include information on the Company's code of conduct, Lifeline and ACP rules and the Company's operating procedures (including a compliance checklist) to comply with those rules, the Company's obligation to report to the FCC material noncompliance with the Lifeline and ACP rules or the terms of the Company's Consent Decree with the FCC, an employee's and agent's obligation to report suspected noncompliance to the Compliance Officer, and the mechanisms and processes by which employees and agents may report noncompliance with applicable laws, regulations, or the Compliance Program. Upon completion of the compliance training, employees and agents shall sign a Certification of Completion attesting that they completed the training.

The Company shall periodically, but not less than annually, review and revise the compliance training as necessary to ensure that it remains current and complete, and to enhance its effectiveness. The Company shall retain a copy of all versions of its compliance training and employee/agent certifications of completion.

## **VI. REVIEW AND MONITORING**

The Compliance Officer shall conduct ongoing review and monitoring of the Company's Compliance Program and compliance processes. This will include but is not limited to monitoring changes in applicable laws and regulations, updating and revising policies, monitoring the activities of Company employees and agents, evaluating the effectiveness of compliance controls, and ensuring all required documentation has been retained. The Compliance Officer's review and monitoring activities may include interviews with employees and agents and the review of written materials and documentation. The Compliance Officer shall also periodically perform in collaboration with management an assessment of the Company's key compliance risks, including but limited to laws and regulations governing the Lifeline Program and ACP, in order to develop mitigation measures, identify modifications to the Compliance Program, and adopt new and revised policies and procedures.

## **VII. INTERNAL REPORTING SYSTEMS**

The Compliance Office shall establish a whistleblower and non-retaliation policy and an internal reporting system, i.e., "Ethics Hotline." A culture of compliance that fosters an open-door policy and encourages individuals to report compliance issues and other concerns and/or suggestions for improvement without fear of retaliation is essential to maintaining an effective compliance program. Open communication enables the Company to learn about issues that may

arise, generating faster responses and quicker fixes. Additionally, open communications allow the Company to address small problems before they become big ones. The confidentiality of information of information shared with the Compliance Officer shall be maintained consistent with the Compliance Officer's legal obligations. Any potential problem or questionable practice which is, or is reasonably likely to be, in violation of or inconsistent with this Compliance Program or the Company's regulatory requirements must be reported to the Compliance Officer.

Under the Company's Whistleblower Policy, any person who in good faith has reason to believe that a potential problem or questionable practice is or may be in existence should report the circumstance to the Compliance Officer. Such reports may be made verbally or in writing and may be made on an anonymous basis. Reports may be made through the following channels:

Air Voice Ethics Hotline:

Email: [compliance@hthcomm.com](mailto:compliance@hthcomm.com)  
Tel: (713) 534-1950

Compliance Officer:

Name: Jane Nguyen  
Email: [jane@hthcomm.com](mailto:jane@hthcomm.com)  
Tel: (713) 534-1950 Ext. 222

Federal Communications Commission Whistleblower Hotline:

Mail: Office of Inspector General  
Federal Communications Commission  
45 L Street N.E.  
Washington, D.C. 20554

Tel: (888) 863-2244  
(202) 418-0473

Fax: (202) 418-2811

Email: [hotline@fcc.gov](mailto:hotline@fcc.gov)

Universal Service Administrative Company (USAC) Whistleblower Hotline:

Mail: Universal Service Administrative Co.  
Attn: Fraud Risk Group  
700 12<sup>th</sup> Street, N.W., Suite 900  
Washington, D.C. 20005

Tel: (888) 203-8100

Email: [hotline@usac.org](mailto:hotline@usac.org)

The Compliance Officer shall promptly document, track, and investigate reported matters. The tracking documentation shall include how the reported matter was handled, by whom, and when. The Compliance Officer's investigation shall be conducted in a discrete, confidential, and objective manner. A full investigation may not be possible if a report made anonymously is vague or general. As appropriate, the Compliance Officer may engage legal counsel or other advisors to assist in the investigation.

## **VIII. INVESTIGATIONS AND REMEDIATION**

Violations of the Company's Compliance Program, failure to comply with applicable laws and regulations, and other types of misconduct threaten the Company's reputation and expose the Company and employees to civil, criminal, and administrative liability. When the Compliance Officer identifies or an employee reports a compliance issue, the Compliance Officer, in consultation with legal counsel in appropriate circumstances, shall promptly initiate an investigation to determine the seriousness of the misconduct or wrongdoing. The Compliance Officer shall maintain thorough documentation of the investigation, which shall include a description of the potential misconduct and how it was reported; a description of the investigative process; a list of relevant documents reviewed; list of employees interviewed; employee interview notes; results of the investigation; and the remediation and corrective actions implemented, including changes to policies and procedures and disciplinary actions. In addition, the Compliance Officer shall take appropriate steps to secure or prevent the destruction of documents or other information relevant to the investigation.

## **IX. DISCIPLINARY GUIDELINES AND PROCEDURES**

Employees who engage in unlawful conduct, fail to take reasonable steps to prevent or detect unlawful conduct, or act in a manner that is inconsistent with the Company's Code of Conduct, policies and procedures, or Compliance Program shall be held accountable. The disciplinary process for acts of noncompliance shall be administered according to the Disciplinary Policies set forth in the Code of Conduct, which include, among other things, oral or written warnings, probation, suspension without pay, or immediate discharge. In each situation, a variety of factors, including but not limited to, the seriousness of the situation, the employee's past conduct and length of service, and the nature of the employee's previous performance or incidents will be considered. The Compliance Officer shall be consulted and may consult legal counsel in determining the seriousness of any violation.