Unsolicited Telecommunication Policy

Effective August 1, 2022

Purpose

Unsolicited Telecommunication Rules ("**UTR**") that is administered by the Canadian Radio-television and Telecommunications Commission aims to reduce the number of unwanted, unsolicited telemarketing calls, as further described below.

The purpose of this Unsolicited Telecommunication Policy ("**Policy**") is to ensure that anyone making telemarketing calls on behalf of Zolo Realty, Brokerage ("**Zolo**") comply with the UTR.

Scope

This Policy applies to all employees, contractors, vendors and other parties making telemarketing calls on behalf of Zolo (collectively, **"Callers**").

Zolo does not generally encourage its employees, contractors, agents or third parties to make telemarketing calls. Zolo's business model generally involves inbound calls. However, where outbound calls are made (and such outbound calls are deemed to be telemarketing calls), all Zolo employees, contractors, agents or third parties are expected to comply with the UTR.

Non-compliance with UTR may result in fines for both organizations and individuals – fines of up to $1,500 for individuals and $15,000 for corporations for each violation.

Definitions

"**Telemarketing**" means the use of telecommunications facilities to make unsolicited telecommunications for the purpose of solicitation;

"**Unsolicited Telecommunications Rules**" or "**UTR**" means all the rules issued by the Canadian Radio-television and Telecommunications Commission and as amended from time to time and includes any compliance and enforcement bulletins and any other guidance documentation.

Roles & Responsibilities

Zolo will appoint a Compliance Officer who is responsible for the implementation of this Policy and will:

- manage the UTR Complaints System, the UTR Auditing System, and the UTR Compliance Training for Zolo;
- create and maintain an approved recipient list and an approved email template for Zolo; and
- attend the UTR Compliance Training (as described below).

COMPLIANCE POLICIES

All Callers must adhere to this Policy and the guidelines attached as Schedule A.

Anyone who makes telemarketing calls on behalf of Zolo is deemed to have accepted this Policy.

No Unsolicited Calls

1. Callers shall not make any outbound calls that are deemed telemarketing calls unless approved by the Caller's manager or director. To seek approval for such calls, Callers must clearly articulate the business case for making such calls.

2. If the telemarketing calls are approved, Callers shall not make any unsolicited telemarketing calls to clients or potential clients (collectively, "**Clients**") unless the Callers have: (a) an existing commercial relationship with the Client; or (b) confirmed that the Client is not on the National Do-Not-Call List ("**DNCL**").

3. Any and all subcontractors and third parties are responsible for compliance with UTR.

National DNCL

4. Prior to making any calls, ensure Callers shall:

   (a) download the numbers from the National DNCL and delete them from your call lists,

   (b) use a version of the National DNCL that is not older than 31 days; and

   (c) do not call the home phone, cellular and fax numbers that Clients have registered on the National DNCL (except where a Clients has consented to be contacted)

5. If a Client is on the National DNCL, Callers may call individuals on the National DNCL only if the individuals have provided express consent to the call in the manner set out in the guidelines.

Obligations When Making a Call

6. When making calls, Callers must:

   (a) use a call script that has been approved by Zolo that identifies who you are and, upon request, provide a fax or telephone number where the person being called can speak to someone about the telemarketing call;

   (b) display the telephone number that you're calling from or that the Client can call to reach you; and

   (c) only call or send faxes between 9:00 a.m. and 9:30 p.m. on weekdays and between 10:00 a.m. and 6:00 p.m. on weekends.

7. Callers must keep an accurate log of all of the calls he/she makes. The log shall include the date, time, Client name, and Client number.

8. Callers shall add a Client's name and phone number to the internal DNCL within 14 days of a Client's do not call request.

9. Callers may not modify approved call script templates without prior written approval from the Compliance Officer.

Internal DNCL

10. If a Caller receives a written or verbal do not call request from a Client, the Caller must promptly: (i) ensure the request is recorded in the CRM database; (ii) take steps to ensure the recipient request will be acted on promptly; and (ii) forward the request to the Compliance Officer. In the case of a verbal do not call request, the Caller must transcribe the request in writing before forwarding it to the Compliance Officer.

11. After receiving a written or verbal do not call request, Callers must immediately honour the Client's request and stop calling the Client.

12. Zolo must give effect to any do not call request from a Client within 14 days and failure to do so is a violation of the UTR that may result in substantial penalties against Zolo.

UTR Complaint System

13. If a Caller receives a complaint regarding a call or any other matter related to the UTR, the Caller must promptly forward the complaint to the Compliance Officer.

14. The Compliance Officer will endeavour to respond to complaints within forty-five (45) days of receiving them.

UTR Auditing System

15. The Compliance Officer will audit the Callers on a quarterly basis. To ensure compliance with this Policy, the audit will be random and may include but not limited to: (i) meetings with Callers; (ii) reviewing the Callers' call log and call lists to ensure the Callers are not calling individuals that are on the National DNCL or internal DNCL; and (iii) ensuring the CRM database and internal do not call lists are up to date.

16. The Compliance Officer will prepare an annual report for Zolo's Board of Directors that summarizes complaints received by Zolo since the last report was submitted, the steps taken to resolve such disputes and the status of such disputes. The annual report will be reviewed by the Board of Directors.

UTR Compliance Training

17. All Callers are required to attend the UTR Compliance Training organized by the Compliance Officer on an annual basis.

18. The Compliance Officer will keep records of who has attended the UTR Compliance Training.

Questions, Feedback & Failure to Comply

19. Any questions in connection with this Policy should initially be directed to the Compliance Officer.

20. Callers are invited to provide feedback to the Compliance Officer regarding the implementation of this Policy through email or otherwise.

21. Callers who fail to comply with this Policy may be subject to disciplinary action, up to and including termination of their employment or services. Employees and contractors of Zolo that fail to comply with this Policy may also be asked to attend additional UTR training seminars or engage in other corrective actions.

If you have any questions regarding the content of this Policy, please consult the Compliance Officer prior to signing below.

Compliance Officer:

Kevin Ali
Phone: (416) 575-5254
Email: Kevin.Ali@zolo.ca
Address: 5200 Yonge Street, Suite 200
Toronto, ON M2N 5P6

Schedule A

Unsolicited Telecommunications Guidelines

Zolo Realty, Brokerage ("**Zolo**"), is committed to ensuring compliance with the Unsolicited Telecommunications Rules ("**Rules**"). These Guidelines apply to all employees, contractors, consultants, agents, and other third parties that calls clients or potential clients (collectively, "**Clients**") on behalf of Zolo. We recognize that these Guidelines may be more restrictive than the Rules, but it is important to Zolo that anyone who works for Zolo comply with these Guidelines.

Guidelines

1. **Do Not Make Any Unsolicited Calls.** Do not make any unsolicited calls unless you have an existing commercial relationship with the Client, or you have confirmed that the Client is not on the National Do-Not-Call List ("**DNCL**"). For the purposes of these Guidelines, an existing commercial relationship is defined as a Client who has done business with Zolo in the previous 18 months.

2. **National DNCL.** Zolo is registered with the National DNCL. Zolo has purchased a subscription for the area codes we intend to call. Prior to making any calls, ensure you:

   (a) download the numbers from the National DNCL and delete them from your call lists,

   (b) use a version of the National DNCL that is not older than 31 days; and

   (c) do not call the home phone, cellular and fax numbers that Clients have registered on the National DNCL (except where the Client has consented to be contacted)

3. **Obtain Consent.** If Client is on the National DNCL, you will need to obtain express consent (as set out in paragraph 4) before the you can call the Client.

4. **Express Consent.** Zolo has a call list (see paragraph 8) and a CRM database that you can check to determine if there is already express consent. Please contact the Compliance Officer if you are not able to locate the list. You are required to: (i) ensure the express consent is recorded in the CRM database; and (ii) inform the Compliance Officer immediately if you received express consent for someone not on the list.

   Acceptable forms of express consent include:

   (a) written consent, including a completed application form signed by the Client giving consent to be contacted by way of telecommunications;

   (b) oral consent, including:

      i. oral consent verified by an independent third party;

      ii. oral consent, where an audio recording of the consent is retained by Zolo or Client of Zolo;

(c) electronic consent through the use of a toll-free number;

(d) electronic consent via the Internet; or

(e) consent through other methods as long as a documented record of Client consent is created by the Client or by an independent third party.the specific purpose for which the consent of the recipient is sought.

5. **Obligations When Making a Call.** When making calls:

(a) use a call script that has been approved by Zolo that identifies who you are and, upon request, provide a fax or telephone number where the person being called can speak to someone about the telemarketing call;

(b) display the telephone number that you're calling from or that the Client can call to reach you; and

(c) only call or send faxes between 9:00 a.m. and 9:30 p.m. on weekdays and between 10:00 a.m. and 6:00 p.m. on weekends.

6. **Call Logs.** Keep an accurate log of all of the calls you make. The logs should include the date, time, Client name, and Client number.

7. **Internal Do Not Call List.** Zolo will keep an up-to-date internal "do not call list". You are required to add a Client's name and phone number to the CRM database and internal do not call list within 14 days of a Client's do not call request.

8. **Call Lists.** You are partly responsible for keeping the call lists up to date. While Zolo uses systems to keep track of the Client who have submitted a do not call request, you must review the call lists on a regular basis to ensure the call lists are up to date.

9. **Additional information.** You can find detailed information on the unsolicited telecommunication rules by visiting **https://crtc.gc.ca/eng/phone/telemarketing/**

10. **Changes to these Guidelines.** Zolo may from time to time make changes to these Guidelines to reflect changes in its legal or regulatory obligations or in the manner in which Zolo deals with unsolicited telemarketing calls.

Zolo will communicate any revised version of these Guidelines by providing a copy of the revised Guidelines on Zolo's website.

11. **Contact.** Any concern, inquiry or request regarding these Guidelines should be directed in writing to:

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Email: Kevin.Ali@zolo.ca
Address: 5200 Yonge Street, Suite 200
Toronto, ON M2N 5P6