JOHANSON GROUP

System and Organization Controls (SOC) 2 Type II Report

Report on Controls Placed in Operation and Test of Operating Effectiveness Relevant to the Trust Services Criteria for Security Category

For the Period

July 01, 2024 to September 30, 2024

Together with Independent Service Auditor's Report

Report on Management's Description of

Synadia

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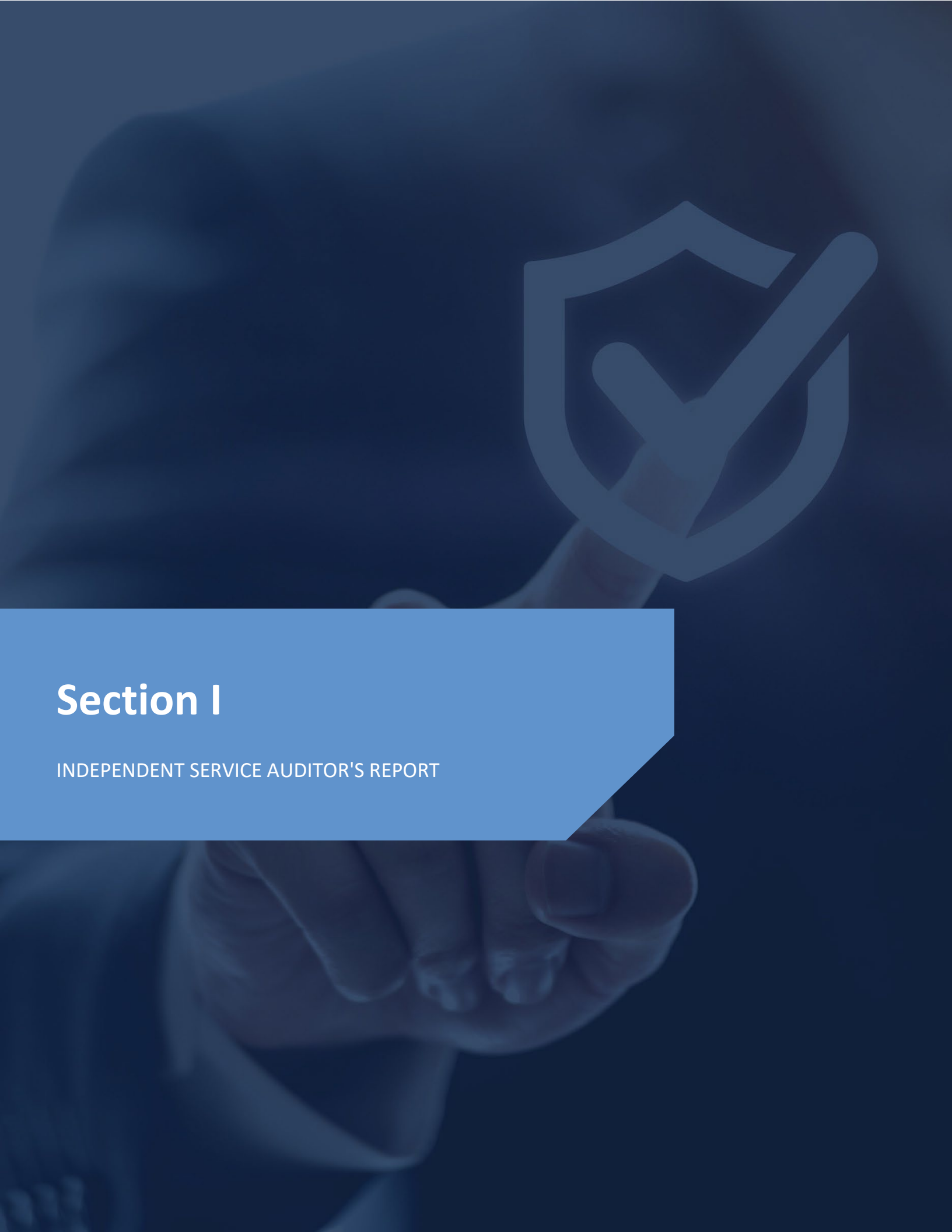


Section I

INDEPENDENT SERVICE AUDITOR'S REPORT

Synadia Communications, Inc.

Scope

We have examined Synadia Communications, Inc.'s accompanying description of its Synadia (system) titled "Description of Synadia" throughout the period July 01, 2024 to September 30, 2024 (description) based on the criteria for a description of a service organization's system set forth in DC 200, *2018 Description Criteria for a Description of a Service Organization's System in a SOC 2 Report (With Revised Implementation Guidance — 2022) in AICPA, Description Criteria, (description criteria)* and the suitability of the design and operating effectiveness of controls stated in the description throughout the period July 01, 2024 to September 30, 2024, to provide reasonable assurance that Synadia Communications, Inc.'s service commitments and system requirements were achieved based on trust services criteria relevant to security principles (applicable trust services criteria) set forth in TSP 100, *2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy (With Revised Points of Focus — 2022) in AICPA, Trust Services Criteria.*

Synadia Communications, Inc. uses a subservice organization, to provide data center facility and hosting services. The description indicates that complementary subservice organization controls that are suitably designed and operating effectively are necessary, along with controls at Synadia Communications, Inc., to achieve Synadia Communications, Inc.'s service commitments and system requirements based on the applicable trust services criteria. The description presents Synadia Communications, Inc.'s controls, the applicable trust services criteria, and the types of complementary subservice organization controls assumed in the design of Synadia Communications, Inc.'s controls. The description does not disclose the actual controls at the subservice organization. Our examination did not include the services provided by the subservice organization, and we have not evaluated the suitability of the design or operating effectiveness of such complementary subservice organization controls.

The description indicates that complementary user entity controls that are suitably designed and operating effectively are necessary, along with controls at Synadia Communications, Inc., to achieve Synadia Communications, Inc.'s service commitments and system requirements based on the applicable trust services criteria. The description presents Synadia Communications, Inc.'s controls, the applicable trust services criteria, and the complementary user entity controls assumed in the design of Synadia Communications, Inc.'s controls. Our examination did not include such complementary user entity controls and we have not evaluated the suitability of the design or operating effectiveness of such controls.

Service Organization's Responsibilities

Synadia Communications, Inc. is responsible for its service commitments and system requirements and for designing, implementing, and operating effective controls within the system to provide reasonable assurance that Synadia Communications, Inc.'s service commitments and system requirements were achieved. Synadia Communications, Inc. has provided an assertion titled "Assertion of Synadia Communications, Inc.'s Management" (assertion) about the description and the suitability of design and operating effectiveness of the controls stated therein. Synadia Communications, Inc. is responsible for preparing the description and assertion; including the completeness, accuracy, and method of presentation of the description and assertion; providing the services covered by the description; selecting the applicable trust services criteria, and stating the related controls in the description, and identifying the risks that threaten the achievement of the service organization's service commitments and system requirements.

Service Auditor's Responsibilities

Our responsibility is to express an opinion on the description and on the suitability of design and operating effectiveness of controls stated in the description based on our examination. Our examination was conducted in accordance with attestation standards established by the AICPA. Those standards require that we plan and perform our examination to obtain reasonable assurance about whether, in all material respects, the description is presented in accordance with the description criteria and the controls stated therein were suitably designed and operated effectively to provide reasonable assurance that the service organization's service commitments and system requirements were achieved based on the applicable trust services criteria. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

An examination of the description of a service organization's system and the suitability of the design and operating effectiveness of controls involves the following:

- Obtaining an understanding of the system and the service organization's service commitments and system requirements.
- Assessing the risks that the description is not presented in accordance with the description criteria and that controls were not suitably designed or did not operate effectively.
- Performing procedures to obtain evidence about whether the description is presented in accordance with the description criteria.
- Performing procedures to obtain evidence about whether controls stated in the description were suitably designed to provide reasonable assurance that the service organization achieved its service commitments and system requirements based on the applicable trust services criteria.
- Testing the operating effectiveness of controls stated in the description to provide reasonable assurance that the service organization achieved its service commitments and system requirements based on the applicable trust services criteria.
- Evaluating the overall presentation of the description.

Our examination also included performing such other procedures as we considered necessary in the circumstances.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

Inherent Limitations

The description is prepared to meet the common needs of a broad range of report users and may not, therefore, include every aspect of the system that individual users may consider important to meet their informational needs.

There are inherent limitations in the effectiveness of any system of internal control, including the possibility of human error and the circumvention of controls.

Because of their nature, controls may not always operate effectively to provide reasonable assurance that the service organization's service commitments and system requirements are achieved based on the applicable trust services criteria. Also, the projection to the future of any conclusions about the suitability of the design and operating effectiveness of controls is subject to the risk that controls may become inadequate because of changes in conditions or that the degree of compliance with the policies or procedures may deteriorate.

Description of Test of Controls

The specific controls tested and the nature, timing, and results of those tests are presented in the section of our report titled "Description of Test of Controls and Results Thereof."

Opinion

In our opinion, in all material respects,

a. The description presents Synadia Communications, Inc.'s Synadia (system) that was designed and implemented throughout the period July 01, 2024 to September 30, 2024 in accordance with the description criteria.
b. The controls stated in the description were suitably designed throughout the period July 01, 2024 to September 30, 2024, to provide reasonable assurance that Synadia Communications, Inc.'s service commitments and system requirements would be achieved based on the applicable trust services criteria, if its controls operated effectively throughout the period and if the subservice organization and user entities applied the complementary controls assumed in the design of Synadia Communications, Inc.'s controls throughout the period.
c. The controls stated in the description operated effectively throughout the period July 01, 2024 to September 30, 2024, to provide reasonable assurance that Synadia Communications, Inc.'s service commitments and system requirements were achieved based on the applicable trust services criteria if complementary subservice organization controls and complementary user entity controls assumed in the design of Synadia Communications, Inc.'s controls operated effectively throughout the period.

Restricted Use

This report, including the description of tests of controls and results thereof in the section of our report titled "Description of Test of Controls and Results Thereof" is intended solely for the information and use of Synadia Communications, Inc.; user entities of Synadia Communications, Inc.'s Synadia during some or all of the period July 01, 2024 to September 30, 2024, business partners of Synadia Communications, Inc. subject to risks arising from interactions with the Synadia Communications, Inc.'s processing system; practitioners providing services to such user entities and business partners; prospective user entities and business partners; and regulators who have sufficient knowledge and understanding of the following:

- The nature of the service provided by the service organization.
- How the service organization's system interacts with user entities, subservice organizations, and other parties.
- Internal control and its limitations.
- Complementary user entity controls and complementary subservice organization controls and how those controls interact with the controls at the service organization to achieve the service organization's service commitments and system requirements.
- User entity responsibilities and how they may affect the user entity's ability to effectively use the service organization's services.
- The applicable trust services criteria.
- The risks that may threaten the achievement of the service organization's service commitments and system requirements and how controls address those risks.

This report is not intended to be, and should not be, used by anyone other than these specified parties.

JohansonGroup LLP

Colorado Springs, Colorado
December 12, 2024

Section II

ASSERTION OF SYNADIA COMMUNICATIONS, INC. MANAGEMENT

We have prepared the accompanying description of Synadia Communications, Inc.'s "Description of Synadia" for the period July 01, 2024 to September 30, 2024, (description) based on the criteria for a description of a service organization's system set forth in DC 200, *2018 Description Criteria for a Description of a Service Organization's System in a SOC 2 Report (With Revised Implementation Guidance — 2022) in AICPA, Description Criteria (description criteria).* The description is intended to provide report users with information about Synadia Communications, Inc.'s Synadia (system) that may be useful when assessing the risks arising from interactions with Synadia Communications, Inc.'s system, particularly information about system controls that Synadia Communications, Inc. has designed, implemented, and operated to provide reasonable assurance that its service commitments and system requirements were achieved based on the trust services criteria relevant to security (applicable trust services criteria) set forth in TSP 100, *2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy (With Revised Points of Focus — 2022) in AICPA, Trust Services Criteria.*

Synadia Communications, Inc. uses a subservice organization to provide data center facility and hosting services. The description indicates that complementary subservice organization controls that are suitably designed and operating effectively are necessary, along with controls at Synadia Communications, Inc., to achieve Synadia Communications, Inc.'s service commitments and system requirements based on the applicable trust services criteria. The description presents Synadia Communications, Inc.'s controls, the applicable trust services criteria, and the types of complementary subservice organization controls assumed in the design of Synadia Communications, Inc.'s controls. The description does not disclose the actual controls at the subservice organization.

The description indicates that complementary user entity controls that are suitably designed and operating effectively are necessary, along with controls at Synadia Communications, Inc., to achieve Synadia Communications, Inc.'s service commitments and system requirements based on the applicable trust services criteria. The description presents Synadia Communications, Inc.'s controls, the applicable trust services criteria, and the complementary user entity controls assumed in the design of Synadia Communications, Inc.'s controls.

We confirm, to the best of our knowledge and belief, that:

a. The description presents Synadia Communications, Inc.'s Synadia (system) that was designed and implemented throughout the period July 01, 2024 to September 30, 2024, in accordance with the description criteria.
b. The controls stated in the description were suitably designed throughout the period July 01, 2024 to September 30, 2024, to provide reasonable assurance that Synadia Communications, Inc.'s service commitments and system requirements would be achieved based on the applicable trust services criteria, if its controls operated effectively throughout that period, and if the subservice organization and user entities applied the complementary controls assumed in the design of Synadia Communications, Inc.'s controls throughout that period.
c. The controls stated in the description operated effectively throughout the period July 01, 2024 to September 30, 2024, to provide reasonable assurance that Synadia Communications, Inc.'s service commitments and system requirements were achieved based on the applicable trust services criteria if complementary subservice organization controls and complementary user entity controls assumed in the design of Synadia Communications, Inc.'s controls operated effectively throughout that period.

Synadia Communications, Inc. Management
December 12, 2024

Section III

DESCRIPTION OF SYNADIA

COMPANY BACKGROUND

Synadia Communications, Inc. is a software technology company headquartered in Los Angeles, CA. Synadia was founded in 2018 by the creator of the NATS.io open-source project in order to build products and services surrounding this core technology. Synadia maintains the majority of the open-source projects surrounding the NATS project.

DESCRIPTION OF SERVICES OVERVIEW OR SERVICES PROVIDED

Synadia currently offers two core products, Synadia Platform and Synadia Cloud.

Synadia Platform is a set of components that are deployed together, including NATS and additional commercial components. Synadia Platform is available as a fully managed deployment by Synadia in the customer's cloud environment or self-managed by the customer without operational involvement by Synadia. For both deployment models, a support SLA is included which provides the submission of tickets by the customer with a predetermined response time requirement. The managed delivery option includes a service uptime SLA as well.

Synadia Cloud is multi-tenant software-as-a-service (SaaS) leveraging the same core set of components as Synadia Platform but deployed across all major cloud providers and many regions providing global connectivity. Synadia Cloud includes an uptime SLA for general availability inclusive of highly available (HA) assets such as streams and consumers.

PRINCIPAL SERVICE COMMITMENTS AND SYSTEM REQUIREMENTS

Synadia Communications, Inc. designs its processes and procedures related to the system to meet its objectives. Those objectives are based on the service commitments that Synadia Communications, Inc. makes to user entities, the laws, and regulations that govern the provision of the services, and the financial, operational, and compliance requirements that Synadia Communications, Inc. has established for the services. The system services are subject to the security commitments established internally for their services.

Synadia uses our Synadia Cloud MSA, terms of service, SLAs, and document definitions to communicate our commitments to our customers.

Security Commitments

Security commitments include, but are not limited to, the following:

- System features and configuration settings are designed to authorize user access while restricting unauthorized users from accessing information not needed for their role.
- Use of intrusion detection systems to identify potential security attacks from users outside the boundaries of the system.
- Regular vulnerability scans over the system and network, and penetration tests over the production environment.
- Operational procedures for managing security incidents and breaches, including notification procedures.
- Use of encryption technologies to protect customer data both at rest and in transit.
- Use of data retention and data disposal.
- Uptime availability of production systems.

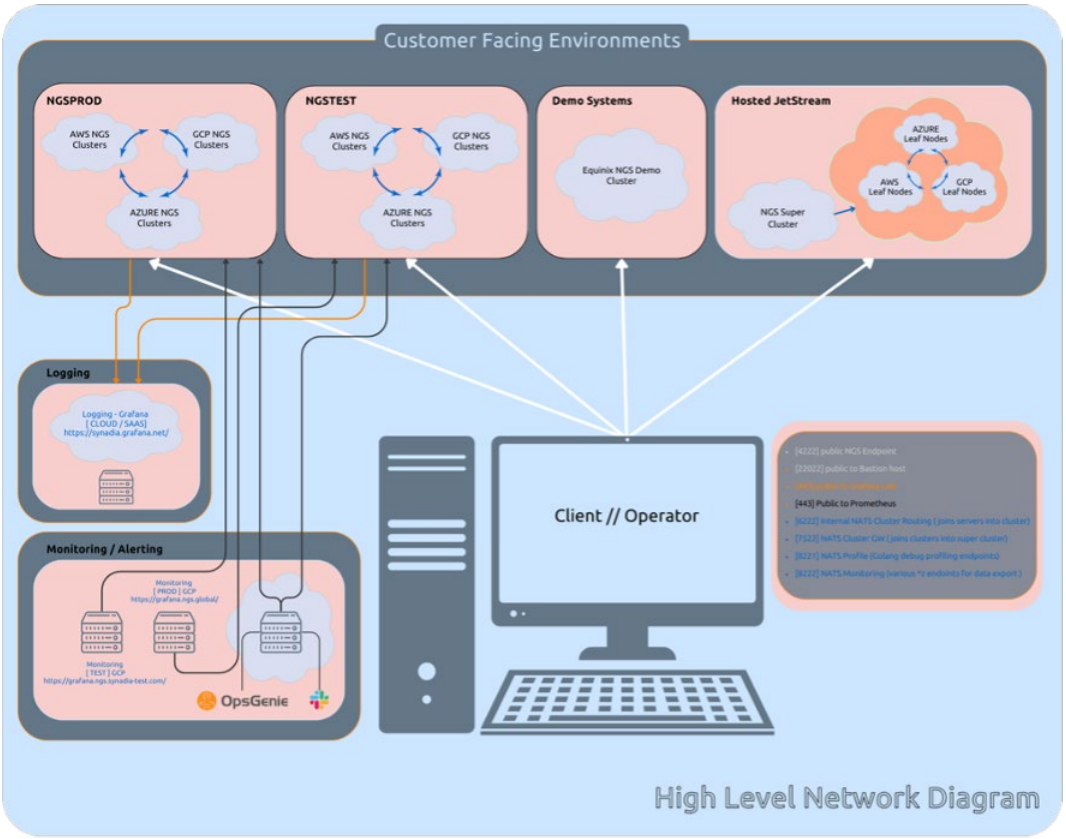
COMPONENTS OF THE SYSTEM

The System description is comprised of the following components:

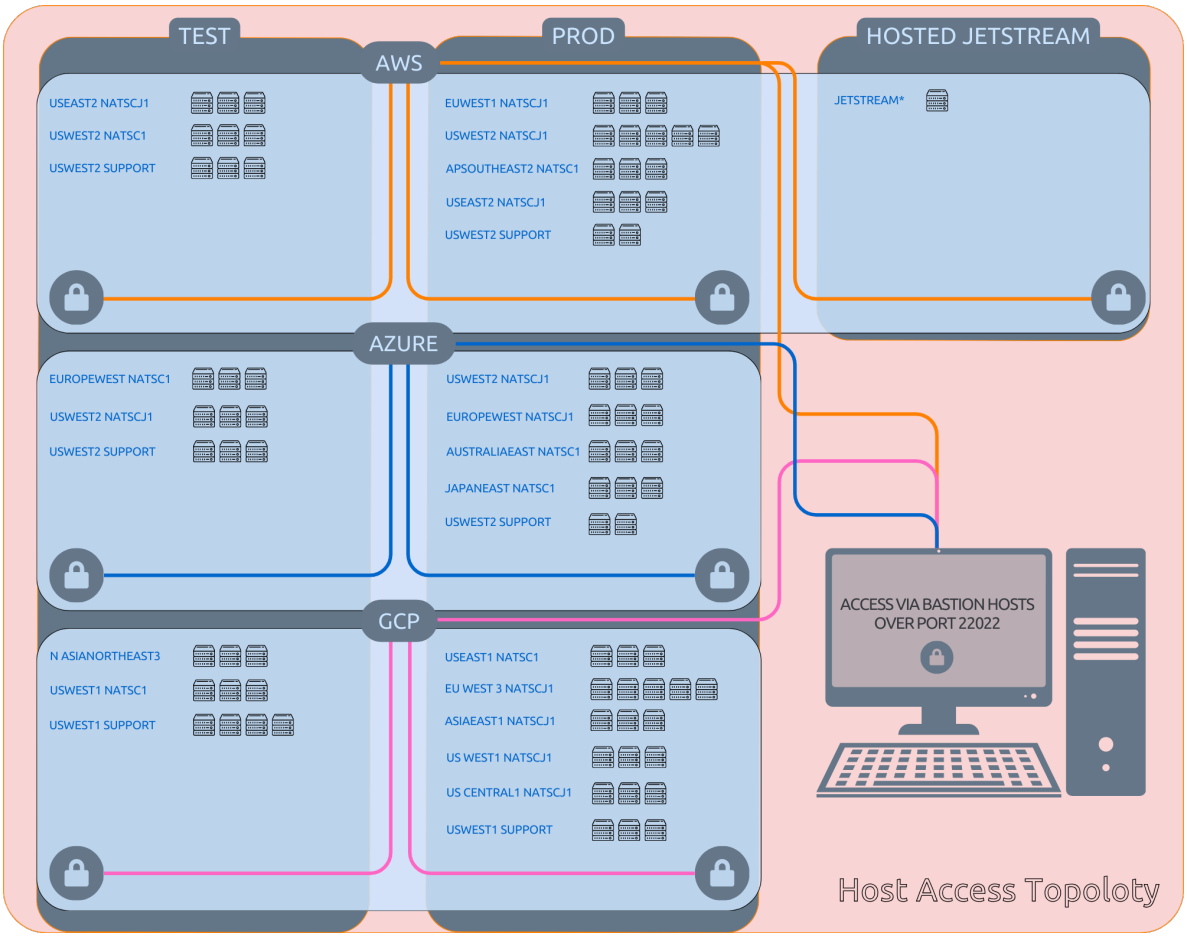
- Software – The application programs and IT system software that supports application programs (operating systems, middleware, and utilities), the types of databases used, the nature of external facing web applications, and the nature of applications developed in-house, including details about whether the applications in use are mobile applications or desktop or laptop applications.
- People – The personnel involved in the governance, operation, security, and use of a system (business unit personnel, developers, operators, user entity personnel, vendor personnel, and managers).
- Data – The types of data used by the system, such as transaction streams, files, databases, tables, and output used or processed by the system.
- Procedures – The automated and manual procedures related to the services provided, including, as appropriate, procedures by which service activities are initiated, authorized, performed, and delivered, and reports and other information prepared.

Infrastructure

Synadia Communications, Inc. maintains a system inventory that includes virtual machines, computers (desktops and laptops), and networking devices (switches and routers). The inventory documents the device name, inventory type, description, and owner. To outline the topology of its network, the organization maintains the following network diagram(s).



Hardware	Type	Purpose (optional)
AWS Elastic Compute Cloud (EC2)	AWS	
AWS Elastic Load Balancers	AWS	Load balances internal and external traffic.
Virtual Private Cloud	AWS	Protects the network perimeter and restricts inbound and outbound access.
S3 Buckets	AWS	Storage, upload, and download.
Azure Platform	Azure	Managed cloud platform where services are hosted.
Azure Virtual Machine	Azure	Virtual machine service for web hosting and backend service offerings.
Azure Kubernetes	Azure	Container orchestration for deployment, scaling, and management.
Azure Database	Azure	Transactional database with backups and redundancy.
Google Cloud Server	Hosting	Outsourced hosting provider.
Digital Ocean	Digital Ocean	Container runtime for web services, APIs, workers, and schedulers. Includes right-scaling and self-heading to replace failed containers.



Software

Synadia Communications, Inc. is responsible for managing the development and operation of Synadia Cloud including infrastructure components such as servers, databases, and storage systems. The in-scope Synadia Communications, Inc. infrastructure and software components are provided below:

- Amazon Web Services – Cloud hosting services and SDKs.

- Google Cloud – Cloud hosting services and SDKs.
- Microsoft Azure – Cloud hosting services and SDKs.
- Digital Ocean – Cloud hosting services.
- Grafana Cloud – Cloud-hosted metrics and log ingestion and dashboarding.
- Checkr.com – Employee background checks.
- GitHub – Version control and collaboration.
- Google Workspace – Email and document management.
- ADP Run – Employee salary management.
- Slack – Real-time chat.
- Vanta – Compliance service for automated checks.
- Security Onion – IDS.

People

The company employs dedicated team members to handle major product functions, including operations, and support. The IT/Engineering Team monitors the environment, as well as manages data backups and recovery. The Company focuses on hiring the right people for the right job as well as training them both on their specific tasks and on the ways to keep the company and its data secure.

Synadia Communications, Inc. has a staff of approximately 50 organized in the following functional areas:

- Management: Individuals who are responsible for enabling other employees to perform their jobs effectively and for maintaining security and compliance across the environment. This includes the CxOs, VPs, Directors, and Managers.

- Operations: Responsible for maintaining the availability of production infrastructure, and managing access and security for production infrastructure. Only members of the Operations team have access to the production environment. Members of the Operations team may also be members of the Engineering team.

- Security Operations: Responsible for reviewing and investigating the output of security monitoring tools, assisting the Operations team with the security of production infrastructure, and helping to guide, manage, and maintain the organization's security and compliance efforts.

- Product Development: Responsible for the development, testing, deployment, and maintenance of the source code for the system. Responsible for the product life cycle, including adding additional product functionality.

Data

Data as defined by Synadia Communications, Inc., constitutes the following:

User and account data - this includes Personally Identifiable Information (PII) and other data from employees, customers, users (customers' employees), and other third parties such as suppliers, vendors, business partners, and contractors. This collection is permitted under the Terms of Service and Privacy Policy (as well as other separate agreements with vendors, partners, suppliers, and other relevant third parties). Access to PII is controlled through processes for provisioning system permissions, as well as ongoing monitoring activities, to ensure that sensitive data is restricted to employees based on job function.

Data is categorized into the following major types of data used by Synadia Communications, Inc.:

Category	Description	Examples
Public	Public information is not confidential and can be made public without any implications for Synadia Communications, Inc.	• Press releases • Public website
Internal	Access to internal information is approved by management and is protected from external access.	• Internal memos • Design documents • Product specifications • Correspondences

Customer Data	Information received from customers for processing or storage by Synadia Communications, Inc. Synadia Communications, Inc. must uphold the highest possible levels of integrity, confidentiality, and restricted availability for this information.	• Customer operating data • Customer PII • Customers' customers' PII • Anything subject to a confidentiality agreement with a customer
Company Data	Information collected and used by Synadia Communications, Inc. to operate the business. Synadia Communications, Inc. must uphold the highest possible levels of integrity, confidentiality, and restricted availability for this information.	• Legal documents • Contractual agreements • Employee PII • Employee salaries

Customer data is managed, processed, and stored in accordance with the relevant data protection and other regulations, with specific requirements formally established in customer agreements, if any. Customer data is captured which is utilized by the company in delivering its services.

All employees and contractors of the company are obligated to respect and, in all cases, protect customer data. Additionally, Synadia Communications, Inc. has policies and procedures in place for proper and secure handling of customer data. These policies and procedures are reviewed on at least an annual basis.

PROCESSES AND PROCEDURES

Management has developed and communicated policies and procedures to manage the information security of the system. Changes to these procedures are performed annually and authorized by management, the executive team, and control owners. These procedures cover the following key security life cycle areas:

- Physical Security
- Logical Access
- Availability
- Change Control
- Data Communications
- Risk Assessment
- Data Retention
- Vendor Management

Physical Security

Synadia Communications, Inc.'s production servers are maintained by Microsoft Azure, Amazon AWS, Google Cloud Platform, and Digital Ocean. The physical and environmental security protections are the responsibility of Microsoft Azure, AWS, Google Cloud Platform, and Digital Ocean. Synadia Communications, Inc. reviews the attestation reports and performs a risk analysis of Microsoft Azure, AWS, Google Cloud Platform, and Digital Ocean on at least an annual basis.

Logical Access

Synadia Communications, Inc. provides employees and contracts access to infrastructure via a role-based access control system, to ensure uniform, least privileged access to identified users and to maintain simple and repeatable user provisioning and de-provisioning processes.

Access to these systems is split into admin roles, user roles, and access roles. User access and roles are reviewed on a quarterly basis to ensure the least privileged access.

Operations Management is responsible for providing access to the system based on the employee's role and performing a background check. The employee is responsible for reviewing Synadia Communications, Inc.'s policies, and completing security training. These steps must be completed within 14 days of hire.

When an employee is terminated, Operations Management is responsible for de-provisioning access to all in-scope systems within 3 days of being informed of the employee's termination.

Computer Operations - Backups

Data required for the service to operate and be available within the stated SLA is backed up and monitored by the Operations Management for completion and exceptions. If there is an exception, Operations Management will perform troubleshooting to identify the root cause and either rerun the backup or as part of the next scheduled backup job.

Backup infrastructure is maintained in Microsoft Azure, AWS, Google Cloud Platform, and Digital Ocean with physical access restricted according to the policies. Backups are encrypted, with access restricted to key personnel.

Computer Operations - Availability

Synadia Communications, Inc. maintains an incident response plan to guide employees on reporting and responding to any information security or data privacy events or incidents. Procedures are in place for identifying, reporting, and acting upon breaches or other incidents.

Synadia Communications, Inc. internally monitors all applications, including the web UI, databases, and cloud storage to ensure that service delivery matches SLA requirements.

Synadia Communications, Inc. utilizes vulnerability scanning software that checks source code for common security issues as well as for vulnerabilities identified in open-source dependencies and maintains an internal SLA for responding to those issues.

Change Management

Synadia Communications, Inc. maintains a Systems Development Lifecycle (SDLC) and Change Management policy document for implementing application and infrastructure changes.

A ticketing system is utilized to document the change control procedures for changes in the application and implementation of new changes. Quality assurance testing and User Acceptance Testing (UAT) results are documented and maintained with the associated change request. Development and testing are performed in an environment that is logically separated from the production environment. Management approves changes prior to migration to the production environment and documents those approvals within the ticketing system.

Version control software is utilized to maintain source code versions and migrate source code through the development process to the production environment. The version control software maintains a history of code changes to support rollback capabilities and tracks changes to developers.

Data Communications

Synadia Communications, Inc. uses IaaS with virtual networks, virtual firewalls, and virtual machines, which are managed through infrastructure-as-code. Ingress includes network traffic over HTTPS, NATS + TLS, and SSH.

Synadia uses internal vulnerability scanning through all 3 major cloud providers. Annual penetration testing is completed by Breachlock and validated by the Operations Management team.

BOUNDARIES OF THE SYSTEM

The boundaries of Synadia Cloud are the specific aspects of the Company's infrastructure, software, people, procedures, and data necessary to provide its services and that directly support the services provided to customers. Any infrastructure, software, people, procedures, and data that indirectly support the services provided to customers are not included within the boundaries of Synadia Cloud.

This report does not include the Cloud Hosting Services provided by AWS at multiple facilities. This report does not include the Cloud Hosting Services provided by Azure at multiple facilities. This report does not include the Cloud Hosting Services provided by GCP at multiple facilities. This report does not include the Cloud Hosting Services provided by Digital Ocean at multiple facilities.

THE APPLICABLE TRUST SERVICES CRITERIA AND THE RELATED CONTROLS

Common Criteria (to the Security Category)
Security refers to the protection of i. information during its collection or creation, use, processing, transmission, and storage, and ii. systems that use electronic information to process, transmit transfer, and store information to enable the entity to meet its objectives. Controls over security prevent or detect the breakdown and circumvention of segregation of duties, system failure, incorrect processing, theft or other unauthorized removal of information or system resources, misuse of software, and improper access to or use of, alteration, destruction, or disclosure of information.

CONTROL ENVIRONMENT

Integrity and Ethical Values

The effectiveness of controls cannot rise above the integrity and ethical values of the people who create, administer, and monitor them. Integrity and ethical values are essential elements of Synadia Communications, Inc.'s control environment, affecting the design, administration, and monitoring of other components. Integrity and ethical behavior are the product of Synadia Communications, Inc.'s ethical and behavioral standards, how they are communicated, and how they are reinforced in practices. They include management's actions to remove or reduce incentives and temptations that might prompt personnel to engage in dishonest, illegal, or unethical acts. They also include the communication of entity values and behavioral standards to personnel through policy statements and codes of conduct, as well as by example.

Specific control activities that the service organization has implemented in this area are described below:

- Formally, documented organizational policy statements and codes of conduct communicate entity values and behavioral standards to personnel.
- Policies and procedures require employees to sign an acknowledgment form indicating they have been given access to the employee manual and understand their responsibility for adhering to the policies and procedures contained within the manual.
- A confidentiality statement agreeing not to disclose proprietary or confidential information, including client information, to unauthorized parties is a component of the employee handbook.
- Background checks are performed for employees as a component of the hiring process.

Commitment to Competence

Synadia Communications, Inc.'s management defines competence as the knowledge and skills necessary to accomplish tasks that define employees' roles and responsibilities. Management's commitment to competence includes management's consideration of the competence levels for jobs and how those levels translate into the requisite skills and knowledge.

Specific control activities that the service organization has implemented in this area are described below:

- Management has considered the competence levels for particular jobs and translated required skills and knowledge levels into written position requirements.
- Training is provided to maintain the skill level of personnel in certain positions.

Management's Philosophy and Operating Style

The Synadia Communications, Inc. management team must balance two competing interests: continuing to grow and develop in a cutting-edge, rapidly changing technology space while remaining excellent and conservative stewards of the highly sensitive data and workflows our customers entrust to us.

The management team meets frequently to be briefed on technology changes that impact the way Synadia Communications, Inc. can help customers build data workflows, as well as new security technologies that can help protect those workflows, and finally, any regulatory changes that may require Synadia Communications, Inc to alter its software to maintain legal compliance. Major planned changes to the business are also reviewed by the management team to ensure they can be conducted in a way that is compatible with our core product offerings and duties to new and existing customers.

Specific control activities that the service organization has implemented in this area are described below:

- Management is periodically briefed on regulatory and industry changes affecting the services provided.
- Executive management meetings are held to discuss major initiatives and issues that affect the business.

Organizational Structure and Assignment of Authority and Responsibility

Synadia Communications, Inc.'s organizational structure provides the framework within which its activities for achieving entity-wide objectives are planned, executed, controlled, and monitored. Management believes establishing a relevant organizational structure includes considering key areas of authority and responsibility. An organizational structure has been developed to suit its needs. This organizational structure is based, in part, on its size and the nature of its activities.

Synadia Communications, Inc.'s assignment of authority and responsibility activities includes factors such as how authority and responsibility for operating activities are assigned and how reporting relationships and authorization hierarchies are established. It also includes policies relating to appropriate business practices, knowledge, and experience of key personnel, and resources provided for carrying out duties. In addition, it includes policies and communications directed at ensuring personnel understand the entity's objectives, know how their individual actions interrelate and contribute to those objectives, and recognize how and for what they will be held accountable.

Specific control activities that the service organization has implemented in this area are described below:

- Organizational charts are in place to communicate key areas of authority and responsibility.
- Organizational charts are communicated to employees and updated as needed.

Human Resource Policies and Practices

Synadia Communications, Inc.'s success is founded on sound business ethics, reinforced with a high level of efficiency, integrity, and ethical standards. The result of this success is evidenced by its proven track record for hiring and retaining top-quality personnel who ensure the service organization is operating at maximum efficiency. Synadia Communications, Inc.'s human resources policies and practices relating to employee hiring, orientation, training, evaluation, counseling, promotion, compensation, and disciplinary activities.

Specific control activities that the service organization has implemented in this area are described below:

- New employees are required to sign acknowledgment forms for the employee handbook and a confidentiality agreement following new hire orientation on their first day of employment.
- Evaluations for each employee are performed on an annual basis.
- Employee termination procedures are in place to guide the termination process and are documented in a termination checklist.

RISK ASSESSMENT PROCESS

Synadia Communications, Inc.'s risk assessment process identifies and manages risks that could potentially affect Synadia Communications, Inc.'s ability to provide reliable and secure services to our customers. As part of this process, Synadia Communications, Inc. maintains a risk register to track all systems and procedures that could present risks to meeting the company's objectives. Risks are evaluated by likelihood and impact, and management creates tasks to address risks that score highly on both dimensions. The risk register is reevaluated annually, and tasks are incorporated into the regular Synadia Communications, Inc. product development process so they can be dealt with predictably and iteratively.

Integration with Risk Assessment

The environment in which the system operates; the commitments, agreements, and responsibilities of Synadia Communications, Inc.'s system; as well as the nature of the components of the system result in risks that the criteria will not be met. Synadia Communications, Inc. addresses these risks through the implementation of suitably designed controls to provide reasonable assurance that the criteria are met. Because each system and the environment in which it operates are unique, the combination of risks to meet the criteria and the controls necessary to address the risks will be unique. As part of the design and operation of the system, Synadia Communications, Inc.'s management identifies the specific risks that the criteria will not be met and the controls necessary to address those risks.

INFORMATION AND COMMUNICATION SYSTEMS

Information and communication are an integral component of Synadia Communications, Inc.'s internal control system. It is the process of identifying, capturing, and exchanging information in the form and time frame necessary to conduct, manage, and control the entity's operations.

Synadia Communications, Inc. uses several information and communication channels internally to share information with management, employees, contractors, and customers. Synadia Communications, Inc. uses chat systems, ticket systems, and email as the primary internal and external communication channels.

Structured data is communicated internally via SaaS applications and project management tools. Finally, Synadia Communications, Inc. uses in-person and video "all hands" meetings to communicate company priorities and goals from management to all employees.

MONITORING CONTROLS

Management monitors controls to ensure that they are operating as intended and that controls are modified as conditions change. Synadia Communications, Inc.'s management performs monitoring activities to continuously assess the quality of internal control over time. Necessary corrective actions are taken as required to correct deviations from company policies and procedures. Employee activity and adherence to company policies and procedures are also monitored. This process is accomplished through ongoing monitoring activities, separate evaluations, or a combination of the two.

On-Going Monitoring

Synadia Communications, Inc.'s management conducts quality assurance monitoring on a regular basis and additional training is provided based on results of monitoring procedures. Monitoring activities are used to initiate corrective action through department meetings, internal conference calls, and informal notifications.

Management's close involvement in Synadia Communications, Inc.'s operations helps to identify significant variances from expectations regarding internal controls. Upper management evaluates the facts and circumstances related to any suspected control breakdown. A decision for addressing any control's weakness is made based on whether the incident was isolated or requires a change in the company's procedures or personnel. The goal of this process is to ensure legal compliance and to maximize the performance of Synadia Communications, Inc.'s personnel.

Reporting Deficiencies

Our internal risk management tracking tool is utilized to document and track the results of ongoing monitoring procedures. Escalation procedures are maintained for responding and notifying management of any identified risks, and instructions for escalation are supplied to employees in company policy documents. Risks receiving a high rating are responded to immediately. Corrective actions, if necessary, are documented and tracked within the internal tracking tool. Annual risk meetings are held for management to review reported deficiencies and corrective actions.

CHANGES TO THE SYSTEM

There have been no significant changes in our systems during the review period or any previous org reviews.

INCIDENTS

There have been no significant security incidents to our systems during the review period or any previous org reviews.

CRITERIA NOT APPLICABLE TO THE SYSTEM

All Common Criteria/Security, and Security criteria were applicable to Synadia Communications, Inc.'s Synadia Cloud service.

SUBSERVICE ORGANIZATIONS

This report does not include the Cloud Hosting Services provided by AWS at multiple facilities. This report does not include the Cloud Hosting Services provided by Azure at multiple facilities. This report does not include the Cloud Hosting Services provided by GCP at multiple facilities. This report does not include the Cloud Hosting Services provided by Digital Ocean at multiple facilities.

SUBSERVICE DESCRIPTION OF SERVICES

The Cloud Hosting Services provided by AWS support the physical infrastructure of the entity's services. The Cloud Hosting Services provided by Azure support the physical infrastructure of the entity's services. The Cloud Hosting Services provided by GCP support the physical infrastructure of the entity's services. The Cloud Hosting Services provided by Digital Ocean support the physical infrastructure of the entity's services.

COMPLEMENTARY SUBSERVICE ORGANIZATION CONTROLS

Synadia Communications, Inc.'s services are designed with the assumption that certain controls will be implemented by subservice organizations. Such controls are called complementary subservice organization controls. It is not feasible for all of the trust services criteria related to Synadia Communications, Inc.'s services to be solely achieved by Synadia Communications, Inc. control procedures. Accordingly, subservice organizations, in conjunction with the services, should establish their own internal controls or procedures to complement those of Synadia Communications, Inc.

The following subservice organization controls have been implemented by Microsoft Azure, AWS, Google Cloud Platform, and Digital Ocean and included in this report to provide additional assurance that the trust services criteria are met:

Subservice Organization - Azure		
Category	**Criteria**	**Control**
Security	CC 6.4	Procedures to restrict physical access to the data center to authorized employees, vendors, contractors, and visitors, have been established.
		Security verification and check-in for personnel requiring temporary access to the interior of the data center facility, including tour groups or visitors, are required.
		Physical access to the data center is reviewed quarterly and verified by the Datacenter Management team.
		Physical access mechanisms (e.g., access card readers, biometric devices, man traps/portals, cages, locked cabinets) have been implemented and are administered to restrict access to authorized individuals.
		The data center facility is monitored 24/7 by security personnel.

Subservice Organization – AWS		
Category	**Criteria**	**Control**
Security	CC 6.4	Physical access to data centers is approved by an authorized individual.
		Physical access is revoked within 24 hours of the employee or vendor record being deactivated.
		Physical access to data centers is reviewed on a quarterly basis by appropriate personnel.
		A closed-circuit television camera (CCTV) is used to monitor server locations in data centers. Images are retained for 90 days unless limited by legal or contractual obligations.
		Access to server locations is managed by electronic access control devices.

Subservice Organization - Google Cloud Platform (GCP)		
Category	**Criteria**	**Control**
Security	CC 6.4	Data center server floors, network rooms, and security systems are physically isolated from public spaces and/or delivery areas.
		Access to sensitive data center zones requires approval from authorized personnel and is controlled via badge access readers, biometric identification mechanisms, and/or physical locks.
		Datacenter perimeters are defined and secured via physical barriers.
		Access lists to high-security areas in data centers are reviewed on a defined basis and inappropriate access is removed in a timely manner.
		Visitors to data center facilities must gain approval from authorized personnel, have their identity verified at the perimeter, and remain with an escort for the duration of the visit.
		Security measures utilized in data centers are assessed annually and the results are reviewed by executive management.
		Data centers are continuously staffed and monitored by security personnel using real-time video surveillance and/or alerts generated by security systems.

Subservice Organization - Digital Ocean		
Category	**Criteria**	**Control**
Security	CC 6.4	Only authorized personnel have access to the facilities housing the system.
		Badge access control systems are in place in order to access the facilities.
		Visitor access to the corporate facility and data center is recorded in visitor access logs.
		Visitors are required to wear a visitor badge while onsite at the facilities.
		Visitors are required to check in with security and show a government-issued ID prior to being granted access to the facilities.
		Visitors are required to have an escort at all times.

Synadia Communications, Inc. management, along with the subservice provider, define the scope and responsibility of the controls necessary to meet all the relevant trust services criteria through written contracts, such as service level agreements. In addition, Synadia Communications, Inc. performs monitoring of the subservice organization controls, including the following procedures:

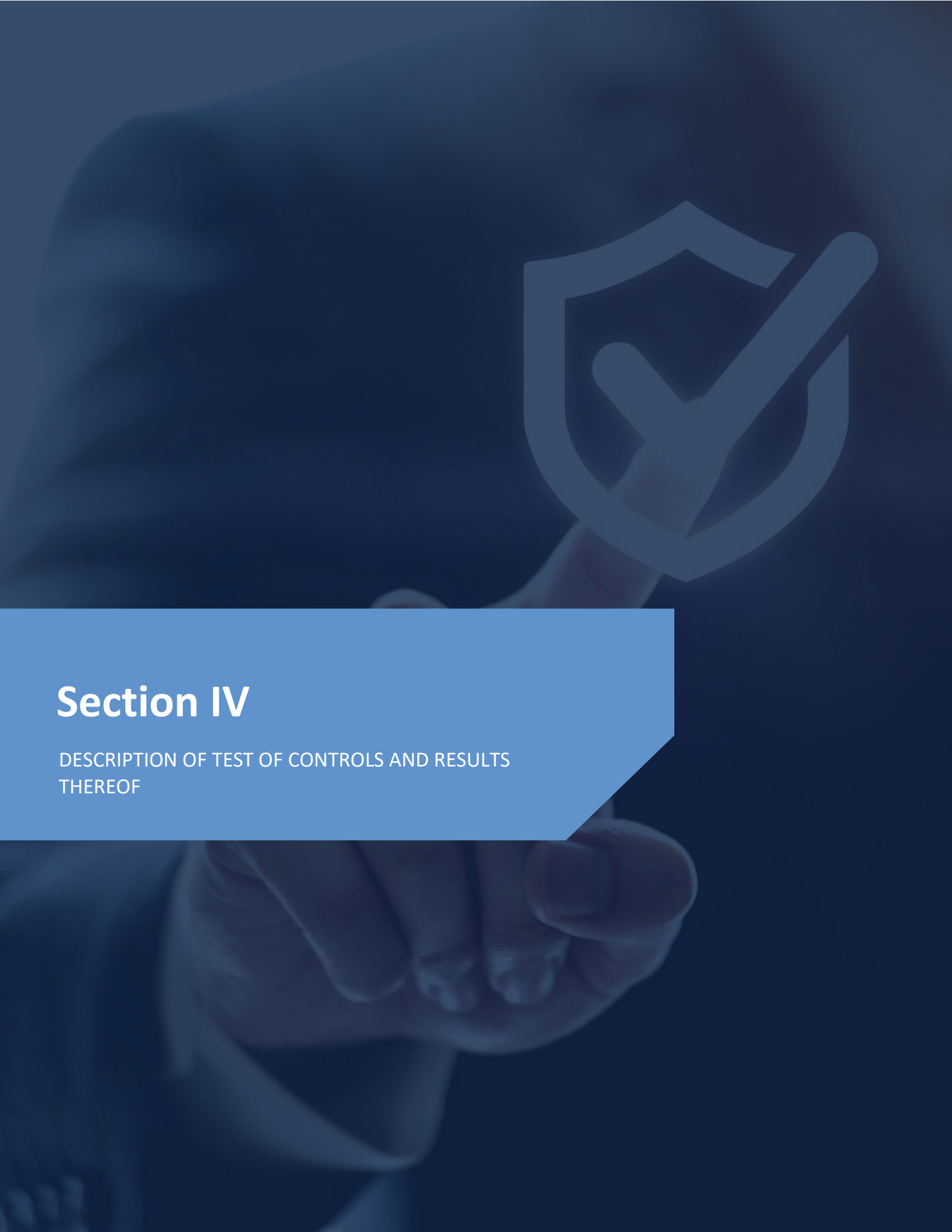
- Reviewing and reconciling output reports.
- Holding periodic discussions with vendors and subservice organization(s).
- Making regular site visits to vendor and subservice organization(s') facilities.
- Testing controls performed by vendors and subservice organization(s).
- Reviewing attestation reports over services provided by vendors and subservice organization(s).
- Monitoring external communications, such as customer complaints relevant to the services by the subservice organization.

COMPLEMENTARY USER ENTITY CONTROLS

Synadia Communications, Inc.'s services are designed with the assumption that certain controls will be implemented by user entities. Such controls are called complementary user entity controls. It is not feasible for all the Trust Services Criteria related to Synadia Communications, Inc.'s services to be solely achieved by Synadia Communications, Inc. control procedures. Accordingly, user entities, in conjunction with the services, should establish their own internal controls or procedures to complement those of Synadia Communications, Inc.

The following complementary user entity controls should be implemented by user entities to provide additional assurance that the Trust Services Criteria described within this report are met. As these items represent only a part of the control considerations that might be pertinent at the user entities' locations, user entities' auditors should exercise judgment in selecting and reviewing these complementary user entity controls.

1. User entities are responsible for understanding and complying with their contractual obligations to Synadia Communications, Inc.
2. User entities are responsible for notifying Synadia Communications, Inc. of changes made to technical or administrative contact information.
3. User entities are responsible for maintaining their own system(s) of record.
4. User entities are responsible for ensuring the supervision, management, and control of the use of Synadia Communications, Inc. services by their personnel.
5. User entities are responsible for developing their own disaster recovery and business continuity plans that address the inability to access or utilize Synadia Communications, Inc. services.
6. User entities are responsible for providing Synadia Communications, Inc. with a list of approvers for security and system configuration changes for data transmission.
7. User entities are responsible for immediately notifying Synadia Communications, Inc. of any actual or suspected information security breaches, including compromised user accounts, including those used for integrations and secure file transfers.



Section IV

DESCRIPTION OF TEST OF CONTROLS AND RESULTS THEREOF

Relevant trust services criteria and Synadia Communications, Inc.-related controls are an integral part of management's system description and are included in this section. Johanson Group LLP performed testing to determine if Synadia Communications, Inc.'s controls were suitably designed and operating effectively to achieve the specified criteria for the security category set forth in TSP Section 100, *2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy (AICPA, Trust Services Criteria)*, throughout the period July 01, 2024 to September 30, 2024.

Tests of the controls included inquiry of appropriate management, supervisory and staff personnel, observation of Synadia Communications, Inc. activities and operations, and inspection of Synadia Communications, Inc. documents and records. The results of those tests were considered in the planning, the nature, timing, and extent of Johanson LLP's testing of the controls designed to achieve the relevant trust services criteria. As inquiries were performed for substantially all Synadia Communications, Inc. controls, this test was not listed individually for every control in the tables below.

Trust Services Criteria for the Security Category	*Description of Synadia Communications, Inc.'s Controls*	*Service Auditor Test of Controls*	*Results of Service Auditor Test of Controls*
Control Environment			
CC 1.1 COSO Principle 1: The entity demonstrates a commitment to integrity and ethical values.	The company performs background checks on new employees.	Inspected Synadia Communications, Inc.'s completed background checks to determine that the company performs it on new employees.	No exceptions noted.
	The company requires contractor agreements to include a code of conduct or reference to the company code of conduct.	Inspected Synadia Communications, Inc.'s Code of Conduct to determine that the company requires contractor agreements to include a code of conduct or reference to the company code of conduct.	No exceptions noted.
	The company requires employees to acknowledge a code of conduct at the time of hire. Employees who violate the code of conduct are subject to disciplinary actions in accordance with a disciplinary policy.	Inspected Synadia Communications, Inc.'s Code of Conduct to determine that the company requires employees to acknowledge the policy at the time of hire. Employees who violate the code of conduct are subject to disciplinary actions in accordance with a disciplinary policy.	No exceptions noted.
	The company requires contractors to sign a confidentiality agreement at the time of engagement.	Inspected Synadia Communications, Inc.'s contractor agreement to determine that the company requires contractors to sign a confidentiality agreement at the time of engagement.	No exceptions noted.
	The company requires employees to sign a confidentiality agreement during onboarding.	Inspected Synadia Communications, Inc.'s Human Resource Security Policy to determine that the company requires employees to sign a confidentiality agreement during onboarding.	No exceptions noted.
	The company managers are required to complete performance evaluations for direct reports at least annually.	Inspected Synadia Communications, Inc.'s sample of performance evaluations to determine that company managers are required to complete them for direct reports at least annually.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that the performance evaluation was conducted outside the review period on October 19, 2024.
CC 1.2 COSO Principle 2: The board of directors demonstrates independence from management and exercises oversight of the development and performance of internal control.	The company's Board of Directors or a relevant subcommittee is briefed by senior management at least annually on the state of the company's cybersecurity and privacy risk. The board provides feedback and direction to management as needed.	Inspected Synadia Communications, Inc.'s meeting minutes and agenda to determine that the company's Board of Directors or a relevant subcommittee is briefed by senior management at least annually on the state of the company's cybersecurity and privacy risk. The board provides feedback and direction to management as needed.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that the board meeting was conducted outside the review period on October 25, 2024.

Trust Services Criteria for the Security Category	*Description of Synadia Communications, Inc.'s Controls*	*Service Auditor Test of Controls*	*Results of Service Auditor Test of Controls*
	The company's board of directors has a documented charter that outlines its oversight responsibilities for internal control.	Inspected Synadia Communications, Inc.'s Board of Directors charter to determine that the company's board of directors has a documented charter that outlines its oversight responsibilities for internal control.	No exceptions noted.
	The company's board members have sufficient expertise to oversee management's ability to design, implement, and operate information security controls. The board engages third-party information security experts and consultants as needed.	Inspected Synadia Communications, Inc.'s Board of Directors CVs to determine that the company's board members have sufficient expertise to oversee management's ability to design, implement, and operate information security controls. The board engages third-party information security experts and consultants as needed.	No exceptions noted.
	The company's board of directors meets at least annually and maintains formal meeting minutes. The board includes directors that are independent of the company.	Inspected Synadia Communications, Inc.'s meeting minutes and agenda to determine that the company's board of directors meets at least annually and maintains formal meeting minutes. The board includes directors that are independent of the company.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that the board meeting was conducted outside the review period on October 25, 2024.
CC 1.3 COSO Principle 3: Management establishes, with board oversight, structures, reporting lines, and appropriate authorities and responsibilities in the pursuit of objectives.	The company's board of directors has a documented charter that outlines its oversight responsibilities for internal control.	Inspected Synadia Communications, Inc.'s Board of Directors charter to determine that the company's board of directors has a documented charter that outlines its oversight responsibilities for internal control.	No exceptions noted.
	The company management has established defined roles and responsibilities to oversee the design and implementation of information security controls.	Inspected Synadia Communications, Inc.'s security policies to determine that the company management has established defined roles and responsibilities to oversee the design and implementation of information security controls.	No exceptions noted.
	The company maintains an organizational chart that describes the organizational structure and reporting lines.	Inspected Synadia Communications, Inc.'s organization chart to determine that the company maintains a chart that describes the organizational structure and reporting lines.	No exceptions noted.
	Roles and responsibilities for the design, development, implementation, operation, maintenance, and monitoring of information security controls are formally assigned in job descriptions and/or the Roles and Responsibilities policy.	Inspected Synadia Communications, Inc.'s Information Security Roles and Responsibilities to determine that roles and responsibilities for the design, development, implementation, operation, maintenance, and monitoring of information security controls are formally assigned in job descriptions and/or the Roles and Responsibilities policy.	No exceptions noted.
CC 1.4 COSO Principle 4: The entity demonstrates a commitment to attract, develop, and retain competent individuals in alignment with objectives.	Roles and responsibilities for the design, development, implementation, operation, maintenance, and monitoring of information security controls are formally assigned in job descriptions and/or the Roles and Responsibilities policy.	Inspected Synadia Communications, Inc.'s Information Security Roles and Responsibilities to determine that roles and responsibilities for the design, development, implementation, operation, maintenance, and monitoring of information security controls are formally assigned in job descriptions and/or the Roles and Responsibilities policy.	No exceptions noted.
	The company performs background checks on new employees.	Inspected Synadia Communications, Inc.'s completed background checks to determine that the company performs it on new employees.	No exceptions noted.

Trust Services Criteria for the Security Category	*Description of Synadia Communications, Inc.'s Controls*	*Service Auditor Test of Controls*	*Results of Service Auditor Test of Controls*
	The company managers are required to complete performance evaluations for direct reports at least annually.	Inspected Synadia Communications, Inc.'s sample of performance evaluations to determine that company managers are required to complete them for direct reports at least annually.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that the performance evaluation was conducted outside the review period on October 19, 2024.
	The company requires employees to complete security awareness training within thirty days of hire and at least annually thereafter.	Inspected Synadia Communications, Inc.'s Completed Security Awareness Training to determine that the company requires employees to complete security awareness training within thirty days of hire and at least annually thereafter.	No exceptions noted.
CC 1.5 COSO Principle 5: The entity holds individuals accountable for their internal control responsibilities in the pursuit of objectives.	Roles and responsibilities for the design, development, implementation, operation, maintenance, and monitoring of information security controls are formally assigned in job descriptions and/or the Roles and Responsibilities policy.	Inspected Synadia Communications, Inc.'s Information Security Roles and Responsibilities to determine that roles and responsibilities for the design, development, implementation, operation, maintenance, and monitoring of information security controls are formally assigned in job descriptions and/or the Roles and Responsibilities policy.	No exceptions noted.
	The company requires employees to acknowledge a code of conduct at the time of hire. Employees who violate the code of conduct are subject to disciplinary actions in accordance with a disciplinary policy.	Inspected Synadia Communications, Inc.'s Code of Conduct to determine that the company requires employees to acknowledge the policy at the time of hire. Employees who violate the code of conduct are subject to disciplinary actions in accordance with a disciplinary policy.	No exceptions noted.
	The company managers are required to complete performance evaluations for direct reports at least annually.	Inspected Synadia Communications, Inc.'s sample of performance evaluations to determine that company managers are required to complete them for direct reports at least annually.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that the performance evaluation was conducted outside the review period on October 19, 2024.
Communication and Information			
CC 2.1 COSO Principle 13: The entity obtains or generates and uses relevant, quality information to support the functioning of internal control.	The company performs control self-assessments at least annually to gain assurance that controls are in place and operating effectively. Corrective actions are taken based on relevant findings. If the company has committed to an SLA for a finding, the corrective action is completed within that SLA.	Inspected Synadia Communications, Inc.'s use of Vanta for continuous security monitoring to determine that the company performs control self-assessments at least annually to gain assurance that controls are in place and operating effectively. Corrective actions are taken based on relevant findings.	No exceptions noted.
	The company utilizes a log management tool to identify events that may have a potential impact on the company's ability to achieve its security objectives.	Inspected Synadia Communications, Inc.'s log management tool to determine that the company utilizes it to identify events that may have a potential impact on the company's ability to achieve its security objectives.	No exceptions noted.
	Host-based vulnerability scans are performed at least quarterly on all external-facing systems. Critical and high vulnerabilities are tracked for remediation.	Inspected Synadia Communications, Inc.'s host-based vulnerability scans to determine that it is performed at least quarterly on all external-facing systems. Critical and high vulnerabilities are tracked for remediation.	No exceptions noted.

Trust Services Criteria for the Security Category	*Description of Synadia Communications, Inc.'s Controls*	*Service Auditor Test of Controls*	*Results of Service Auditor Test of Controls*
CC 2.2 COSO Principle 14: The entity internally communicates information, including objectives and responsibilities for internal control, necessary to support the functioning of internal control.	The company management has established defined roles and responsibilities to oversee the design and implementation of information security controls.	Inspected Synadia Communications, Inc.'s security policies to determine that the company management has established defined roles and responsibilities to oversee the design and implementation of information security controls.	No exceptions noted.
	Roles and responsibilities for the design, development, implementation, operation, maintenance, and monitoring of information security controls are formally assigned in job descriptions and/or the Roles and Responsibilities policy.	Inspected Synadia Communications, Inc.'s Information Security Roles and Responsibilities to determine that roles and responsibilities for the design, development, implementation, operation, maintenance, and monitoring of information security controls are formally assigned in job descriptions and/or the Roles and Responsibilities policy.	No exceptions noted.
	The company's information security policies and procedures are documented and reviewed at least annually.	Inspected Synadia Communications, Inc.'s Policy Packet to determine that the company's information security policies and procedures are documented and reviewed at least annually.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that the ISP review was conducted outside of the review period on May 07, 2024.
	The company communicates system changes to authorized internal users.	Inspected Synadia Communications, Inc.'s internal communication for system updates to determine that the company communicates system changes to authorized internal users.	No exceptions noted.
	The company has security and privacy incident response policies and procedures that are documented and communicated to authorized users.	Inspected Synadia Communications, Inc.'s Incident Response Plan to determine that the company has security and privacy incident response policies and procedures that are documented and communicated to authorized users.	No exceptions noted.
	The company provides a description of its products and services to internal and external users.	Inspected Synadia Communications, Inc.'s Product documentation to determine that the company provides a description of its products and services to internal and external users.	No exceptions noted.
	The company requires employees to complete security awareness training within thirty days of hire and at least annually thereafter.	Inspected Synadia Communications, Inc.'s Completed Security Awareness Training to determine that the company requires employees to complete security awareness training within thirty days of hire and at least annually thereafter.	No exceptions noted.
CC 2.3 COSO Principle 15: The entity communicates with external parties regarding matters affecting the functioning of internal control.	The company notifies customers of critical system changes that may affect their processing.	Inspected Synadia Communications, Inc.'s public change log or release notes to determine that the company notifies customers of critical system changes that may affect their processing.	No exceptions noted.
	The company has an external-facing support system in place that allows users to report system information on failures, incidents, concerns, and other complaints to appropriate personnel.	Inspected Synadia Communications, Inc.'s Customer support site or email alias to determine that the company has an external-facing support system in place that allows users to report system information on failures, incidents, concerns, and other complaints to appropriate personnel.	No exceptions noted.
	The company's security commitments are communicated to customers in Master Service Agreements (MSA) or Terms of Service (TOS).	Inspected Synadia Communications, Inc.'s security commitments to determine that it is being communicated to customers in Master Service Agreements (MSA) or Terms of Service (TOS).	No exceptions noted.

Trust Services Criteria for the Security Category	*Description of Synadia Communications, Inc.'s Controls*	*Service Auditor Test of Controls*	*Results of Service Auditor Test of Controls*
	The company provides guidelines and technical support resources relating to system operations to customers.	Inspected Synadia Communications, Inc.'s available external support resources to determine that the company provides guidelines and technical support resources relating to system operations to customers.	No exceptions noted.
	The company provides a description of its products and services to internal and external users.	Inspected Synadia Communications, Inc.'s Product documentation to determine that the company provides a description of its products and services to internal and external users.	No exceptions noted.
	The company has written agreements in place with vendors and related third parties. These agreements include confidentiality and privacy commitments applicable to that entity.	Inspected Synadia Communications, Inc.'s Publicly available terms of service to determine that the company has written agreements in place with vendors and related third parties. These agreements include confidentiality and privacy commitments applicable to that entity.	No exceptions noted.
Risk Assessment			
CC 3.1 COSO Principle 6: The entity specifies objectives with sufficient clarity to enable the identification and assessment of risks relating to objectives.	The company specifies its objectives to enable the identification and assessment of risk related to the objectives.	Inspected Synadia Communications, Inc.'s completed risk assessment exercise to determine that the company specifies its objectives to enable the identification and assessment of risk related to the objectives.	No exceptions noted.
	The company has a documented risk management program in place that includes guidance on the identification of potential threats, rating the significance of the risks associated with the identified threats, and mitigation strategies for those risks.	Inspected Synadia Communications, Inc.'s Third-Party Management Policy to determine that the company has a documented risk management program in place that includes guidance on the identification of potential threats, rating the significance of the risks associated with the identified threats, and mitigation strategies for those risks.	No exceptions noted.
CC 3.2 COSO Principle 7: The entity identifies risks to the achievement of its objectives across the entity and analyzes risks as a basis for determining how the risks should be managed.	The company has a documented business continuity/disaster recovery (BC/DR) plan and tests it at least annually.	Inspected Synadia Communications, Inc.'s tabletop disaster recovery exercise to determine that the company has a documented business continuity/disaster recovery (BC/DR) plan and tests it at least annually.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that the tabletop disaster recovery exercise was conducted outside of the review period in May 2024.
	The company's risk assessments are performed at least annually. As part of this process, threats and changes (environmental, regulatory, and technological) to service commitments are identified and the risks are formally assessed. The risk assessment includes a consideration of the potential for fraud and how fraud may impact the achievement of objectives.	Inspected Synadia Communications, Inc.'s completed risk assessment exercise to determine that the company's risk assessments are performed at least annually. As part of this process, threats and changes (environmental, regulatory, and technological) to service commitments are identified and the risks are formally assessed.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that the risk assessment was conducted outside of the review period on June 28, 2024.
	The company has a documented risk management program in place that includes guidance on the identification of potential threats, rating the significance of the risks associated with the identified threats, and mitigation strategies for those risks.	Inspected Synadia Communications, Inc.'s Third-Party Management Policy to determine that the company has a documented risk management program in place that includes guidance on the identification of potential threats, rating the significance of the risks associated with the identified threats, and mitigation strategies for those risks.	No exceptions noted.

Trust Services Criteria for the Security Category	*Description of Synadia Communications, Inc.'s Controls*	*Service Auditor Test of Controls*	*Results of Service Auditor Test of Controls*
	The company has a vendor management program in place. Components of this program include: critical third-party vendor inventory, vendor's security and privacy requirements, and review of critical third-party vendors at least annually.	Inspected Synadia Communications, Inc.'s vendor management program to determine that the company has a vendor management program in place. Components of this program include: critical third-party vendor inventory, vendor's security and privacy requirements, and review of critical third-party vendors at least annually.	No exceptions noted.
CC 3.3 COSO Principle 8: The entity considers the potential for fraud in assessing risks to the achievement of objectives.	The company's risk assessments are performed at least annually. As part of this process, threats and changes (environmental, regulatory, and technological) to service commitments are identified and the risks are formally assessed. The risk assessment includes a consideration of the potential for fraud and how fraud may impact the achievement of objectives.	Inspected Synadia Communications, Inc.'s completed risk assessment exercise to determine that the company's risk assessments are performed at least annually. As part of this process, threats and changes (environmental, regulatory, and technological) to service commitments are identified and the risks are formally assessed.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that the risk assessment was conducted outside of the review period on June 28, 2024.
	The company has a documented risk management program in place that includes guidance on the identification of potential threats, rating the significance of the risks associated with the identified threats, and mitigation strategies for those risks.	Inspected Synadia Communications, Inc.'s Third-Party Management Policy to determine that the company has a documented risk management program in place that includes guidance on the identification of potential threats, rating the significance of the risks associated with the identified threats, and mitigation strategies for those risks.	No exceptions noted.
CC 3.4 COSO Principle 9: The entity identifies and assesses changes that could significantly impact the system of internal control.	The company has a configuration management procedure in place to ensure that system configurations are deployed consistently throughout the environment.	Inspected Synadia Communications, Inc.'s configuration management procedure to determine that the company ensures that system configurations are deployed consistently throughout the environment.	No exceptions noted.
	The company's penetration testing is performed at least annually. A remediation plan is developed and changes are implemented to remediate vulnerabilities in accordance with SLAs.	Inspected Synadia Communications, Inc.'s penetration test report to determine that the company's penetration testing is performed at least annually. A remediation plan is developed and changes are implemented to remediate vulnerabilities in accordance with SLAs.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that the penetration testing was conducted outside the review period on December 1, 2023.
	The company's risk assessments are performed at least annually. As part of this process, threats and changes (environmental, regulatory, and technological) to service commitments are identified and the risks are formally assessed. The risk assessment includes a consideration of the potential for fraud and how fraud may impact the achievement of objectives.	Inspected Synadia Communications, Inc.'s completed risk assessment exercise to determine that the company's risk assessments are performed at least annually. As part of this process, threats and changes (environmental, regulatory, and technological) to service commitments are identified and the risks are formally assessed.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that the risk assessment was conducted outside of the review period on June 28, 2024.
	The company has a documented risk management program in place that includes guidance on the identification of potential threats, rating the significance of the risks associated with the identified threats, and mitigation strategies for those risks.	Inspected Synadia Communications, Inc.'s Third-Party Management Policy to determine that the company has a documented risk management program in place that includes guidance on the identification of potential threats, rating the significance of the risks associated with the identified threats, and mitigation strategies for those risks.	No exceptions noted.

Trust Services Criteria for the Security Category	*Description of Synadia Communications, Inc.'s Controls*	*Service Auditor Test of Controls*	*Results of Service Auditor Test of Controls*
Monitoring Activities			
CC 4.1 COSO Principle 16: The entity selects, develops, and performs ongoing and/or separate evaluations to ascertain whether the components of internal control are present and functioning.	The company performs control self-assessments at least annually to gain assurance that controls are in place and operating effectively. Corrective actions are taken based on relevant findings. If the company has committed to an SLA for a finding, the corrective action is completed within that SLA.	Inspected Synadia Communications, Inc.'s use of Vanta for continuous security monitoring to determine that the company performs control self-assessments at least annually to gain assurance that controls are in place and operating effectively. Corrective actions are taken based on relevant findings.	No exceptions noted.
	The company's penetration testing is performed at least annually. A remediation plan is developed and changes are implemented to remediate vulnerabilities in accordance with SLAs.	Inspected Synadia Communications, Inc.'s penetration test report to determine that the company's penetration testing is performed at least annually. A remediation plan is developed and changes are implemented to remediate vulnerabilities in accordance with SLAs.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that the penetration testing was conducted outside the review period on December 1, 2023.
	The company has a vendor management program in place. Components of this program include: critical third-party vendor inventory, vendor's security and privacy requirements, and review of critical third-party vendors at least annually.	Inspected Synadia Communications, Inc.'s vendor management program to determine that the company has a vendor management program in place. Components of this program include: critical third-party vendor inventory, vendor's security and privacy requirements, and review of critical third-party vendors at least annually.	No exceptions noted.
	Host-based vulnerability scans are performed at least quarterly on all external-facing systems. Critical and high vulnerabilities are tracked for remediation.	Inspected Synadia Communications, Inc.'s host-based vulnerability scans to determine that it is performed at least quarterly on all external-facing systems. Critical and high vulnerabilities are tracked for remediation.	No exceptions noted.
CC 4.2 COSO Principle 17: The entity evaluates and communicates internal control deficiencies in a timely manner to those parties responsible for taking corrective action, including senior management and the board of directors, as appropriate.	The company performs control self-assessments at least annually to gain assurance that controls are in place and operating effectively. Corrective actions are taken based on relevant findings. If the company has committed to an SLA for a finding, the corrective action is completed within that SLA.	Inspected Synadia Communications, Inc.'s use of Vanta for continuous security monitoring to determine that the company performs control self-assessments at least annually to gain assurance that controls are in place and operating effectively. Corrective actions are taken based on relevant findings.	No exceptions noted.
	The company has a vendor management program in place. Components of this program include: critical third-party vendor inventory, vendor's security and privacy requirements, and review of critical third-party vendors at least annually.	Inspected Synadia Communications, Inc.'s vendor management program to determine that the company has a vendor management program in place. Components of this program include: critical third-party vendor inventory, vendor's security and privacy requirements, and review of critical third-party vendors at least annually.	No exceptions noted.
Control Activities			
CC 5.1 COSO Principle 10: The entity selects and develops control activities that contribute to the mitigation of risks to the achievement of objectives to acceptable levels.	The company's information security policies and procedures are documented and reviewed at least annually.	Inspected Synadia Communications, Inc.'s Policy Packet to determine that the company's information security policies and procedures are documented and reviewed at least annually.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that the ISP review was conducted outside of the review period on May 07, 2024.

Trust Services Criteria for the Security Category	*Description of Synadia Communications, Inc.'s Controls*	*Service Auditor Test of Controls*	*Results of Service Auditor Test of Controls*
	The company has a documented risk management program in place that includes guidance on the identification of potential threats, rating the significance of the risks associated with the identified threats, and mitigation strategies for those risks.	Inspected Synadia Communications, Inc.'s Third-Party Management Policy to determine that the company has a documented risk management program in place that includes guidance on the identification of potential threats, rating the significance of the risks associated with the identified threats, and mitigation strategies for those risks.	No exceptions noted.
CC 5.2 COSO Principle 11: The entity also selects and develops general control activities over technology to support the achievement of objectives.	The company has a formal systems development life cycle (SDLC) methodology in place that governs the development, acquisition, implementation, changes (including emergency changes), and maintenance of information systems and related technology requirements.	Inspected Synadia Communications, Inc.'s Secure Development Policy to determine that it governs the development, acquisition, implementation, changes, and maintenance of information systems and related technology requirements.	No exceptions noted.
	The company's information security policies and procedures are documented and reviewed at least annually.	Inspected Synadia Communications, Inc.'s Policy Packet to determine that the company's information security policies and procedures are documented and reviewed at least annually.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that the ISP review was conducted outside of the review period on May 07, 2024.
	The company's access control policy documents the requirements for the following access control functions: adding new users, modifying users, and/or removing an existing user's access.	Inspected Synadia Communications, Inc.'s Access Control Policy to determine that the company's policy documents the requirements for the following access control functions: adding new users, modifying users, and/or removing an existing user's access.	No exceptions noted.
CC 5.3 COSO Principle 12: The entity deploys control activities through policies that establish what is expected and in procedures that put policies into action.	The company has formal retention and disposal procedures in place to guide the secure retention and disposal of company and customer data.	Inspected Synadia Communications, Inc.'s Data Management Policy to determine that the company has formal retention and disposal procedures in place to guide the secure retention and disposal of company and customer data.	No exceptions noted.
	The company requires changes to software and infrastructure components of the service to be authorized, formally documented, tested, reviewed, and approved prior to being implemented in the production environment.	Inspected Synadia Communications, Inc.'s code changes to determine that the company requires changes to software and infrastructure components of the service to be authorized, formally documented, tested, reviewed, and approved prior to being implemented in the production environment.	No exceptions noted.
	The company has a formal systems development life cycle (SDLC) methodology in place that governs the development, acquisition, implementation, changes (including emergency changes), and maintenance of information systems and related technology requirements.	Inspected Synadia Communications, Inc.'s Secure Development Policy to determine that it governs the development, acquisition, implementation, changes, and maintenance of information systems and related technology requirements.	No exceptions noted.
	The company's data backup policy documents requirements for the backup and recovery of customer data.	Inspected Synadia Communications, Inc.'s Data Management Policy to determine that the company's data backup policy documents requirements for the backup and recovery of customer data.	No exceptions noted.

Trust Services Criteria for the Security Category	*Description of Synadia Communications, Inc.'s Controls*	*Service Auditor Test of Controls*	*Results of Service Auditor Test of Controls*
	Roles and responsibilities for the design, development, implementation, operation, maintenance, and monitoring of information security controls are formally assigned in job descriptions and/or the Roles and Responsibilities policy.	Inspected Synadia Communications, Inc.'s Information Security Roles and Responsibilities to determine that roles and responsibilities for the design, development, implementation, operation, maintenance, and monitoring of information security controls are formally assigned in job descriptions and/or the Roles and Responsibilities policy.	No exceptions noted.
	The company's information security policies and procedures are documented and reviewed at least annually.	Inspected Synadia Communications, Inc.'s Policy Packet to determine that the company's information security policies and procedures are documented and reviewed at least annually.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that the ISP review was conducted outside of the review period on May 07, 2024.
	The company has security and privacy incident response policies and procedures that are documented and communicated to authorized users.	Inspected Synadia Communications, Inc.'s Incident Response Plan to determine that the company has security and privacy incident response policies and procedures that are documented and communicated to authorized users.	No exceptions noted.
	The company specifies its objectives to enable the identification and assessment of risk related to the objectives.	Inspected Synadia Communications, Inc.'s completed risk assessment exercise to determine that the company specifies its objectives to enable the identification and assessment of risk related to the objectives.	No exceptions noted.
	The company has a documented risk management program in place that includes guidance on the identification of potential threats, rating the significance of the risks associated with the identified threats, and mitigation strategies for those risks.	Inspected Synadia Communications, Inc.'s Third-Party Management Policy to determine that the company has a documented risk management program in place that includes guidance on the identification of potential threats, rating the significance of the risks associated with the identified threats, and mitigation strategies for those risks.	No exceptions noted.
	The company has a vendor management program in place. Components of this program include: critical third-party vendor inventory, vendor's security and privacy requirements, and review of critical third-party vendors at least annually.	Inspected Synadia Communications, Inc.'s vendor management program to determine that the company has a vendor management program in place. Components of this program include: critical third-party vendor inventory, vendor's security and privacy requirements, and review of critical third-party vendors at least annually.	No exceptions noted.
Logical and Physical Access			
CC 6.1 The entity implements logical access security software, infrastructure, and architectures over protected information assets to protect them from security events to meet the entity's objectives.	The company maintains a formal inventory of production system assets.	Inspected Synadia Communications, Inc.'s description of inventory items to determine that the company maintains a formal inventory of production system assets.	No exceptions noted.
	The company restricts access to migrate changes to production to authorized personnel.	Inspected Synadia Communications, Inc.'s production deployment to determine that the company restricts access to migrate changes to production to authorized personnel.	No exceptions noted.

Trust Services Criteria for the Security Category	*Description of Synadia Communications, Inc.'s Controls*	*Service Auditor Test of Controls*	*Results of Service Auditor Test of Controls*
	The company requires authentication to production data stores to use authorized secure authentication mechanisms, such as a unique SSH key.	Inspected Synadia Communications, Inc.'s production database authentication to determine that the company requires authentication to production data stores to use authorized secure authentication mechanisms, such as a unique SSH key.	No exceptions noted.
	The company restricts privileged access to encryption keys to authorized users with a business need.	Inspected Synadia Communications, Inc.'s encryption keys to determine that the company restricts privileged access to it to authorized users with a business need.	No exceptions noted.
	The company's data stores housing sensitive customer data are encrypted at rest.	Inspected Synadia Communications, Inc.'s data encryption to determine that data stores housing sensitive customer data are encrypted at rest.	No exceptions noted.
	The company requires authentication to systems and applications to use unique usernames and passwords or authorized Secure Socket Shell (SSH) keys.	Inspected Synadia Communications, Inc.'s Service accounts to determine that the company requires authentication to systems and applications to use unique usernames and passwords or authorized Secure Socket Shell (SSH) keys.	No exceptions noted.
	The company has a data classification policy in place to help ensure that confidential data is properly secured and restricted to authorized personnel.	Inspected Synadia Communications, Inc.'s Data Management Policy to determine that the company has a data classification policy in place to help ensure that confidential data is properly secured and restricted to authorized personnel.	No exceptions noted.
	System access is restricted to authorized access only.	Inspected Synadia Communications, Inc.'s service accounts to determine that the system access is restricted to authorized access only.	No exceptions noted.
	The company's access control policy documents the requirements for the following access control functions: adding new users, modifying users, and/or removing an existing user's access.	Inspected Synadia Communications, Inc.'s Access Control Policy to determine that the company's policy documents the requirements for the following access control functions: adding new users, modifying users, and/or removing an existing user's access.	No exceptions noted.
	The company restricts privileged access to databases to authorized users with a business need.	Inspected Synadia Communications, Inc.'s AWS accounts to determine that the company restricts privileged access to databases to authorized users with a business need.	No exceptions noted.
	The company restricts privileged access to the firewall to authorized users with a business need.	Inspected Synadia Communications, Inc.'s firewall configuration to determine that the company restricts privileged access to the firewall to authorized users with a business need.	No exceptions noted.
	The company restricts privileged access to the operating system to authorized users with a business need.	Inspected Synadia Communications, Inc.'s Access Control Policy to determine that the company restricts privileged access to the operating system to authorized users with a business need.	No exceptions noted.
	The company restricts privileged access to the production network to authorized users with a business need.	Inspected Synadia Communications, Inc.'s AWS accounts to determine that the company restricts privileged access to the production network to authorized users with a business need.	No exceptions noted.
	The company ensures that user access to in-scope system components is based on job role and function or requires a documented access request form and manager approval prior to access being provisioned.	Inspected Synadia Communications, Inc.'s access request ticket and history to determine that the company ensures that user access to in-scope system components is based on job role and function or requires a documented access request form and manager approval prior to access being provisioned.	No exceptions noted.

Trust Services Criteria for the Security Category	*Description of Synadia Communications, Inc.'s Controls*	*Service Auditor Test of Controls*	*Results of Service Auditor Test of Controls*
	The company requires authentication to the production network to use unique usernames and passwords or authorized Secure Socket Shell (SSH) keys.	Inspected Synadia Communications, Inc.'s SSL_TLS on the admin page of the infrastructure console to determine that the company requires authentication to the production network to use unique usernames and passwords or authorized Secure Socket Shell (SSH) keys.	No exceptions noted.
	The company requires passwords for in-scope system components to be configured according to the company's policy.	Inspected Synadia Communications, Inc.'s password policy configured for infrastructure to determine that the company requires passwords for in-scope system components to be configured according to the company's policy.	No exceptions noted.
	The company's production systems can only be remotely accessed by authorized employees possessing a valid multi-factor authentication (MFA) method.	Inspected Synadia Communications, Inc.'s multi-factor authentication to determine that the company's production systems can only be remotely accessed by authorized employees possessing a valid multi-factor authentication (MFA) method.	No exceptions noted.
	The company's production systems can only be remotely accessed by authorized employees via an approved encrypted connection.	Inspected Synadia Communications, Inc.'s SSL/TLS on the admin page of the infrastructure console to determine that the company's production systems can only be remotely accessed by authorized employees via an approved encrypted connection.	No exceptions noted.
	The company's network is segmented to prevent unauthorized access to customer data.	Inspected Synadia Communications, Inc.'s Network segregation to determine that the company's network is segmented to prevent unauthorized access to customer data.	No exceptions noted.
CC 6.2 Prior to issuing system credentials and granting system access, the entity registers and authorizes new internal and external users whose access is administered by the entity. For those users whose access is administered by the entity, user system credentials are removed when user access is no longer authorized.	The company's access control policy documents the requirements for the following access control functions: adding new users, modifying users, and/or removing an existing user's access.	Inspected Synadia Communications, Inc.'s Access Control Policy to determine that the company's policy documents the requirements for the following access control functions: adding new users, modifying users, and/or removing an existing user's access.	No exceptions noted.
	The company conducts access reviews at least quarterly for the in-scope system components to help ensure that access is restricted appropriately. Required changes are tracked to completion.	Inspected Synadia Communications, Inc.'s completed access reviews to determine that it is being conducted at least quarterly for the in-scope system components to help ensure that access is restricted appropriately. Required changes are tracked to completion.	No exceptions noted.
	The company completes termination checklists to ensure that access is revoked for terminated employees within SLAs.	Inspected Synadia Communications, Inc.'s employee termination checklist to determine that the company completes termination checklists to ensure that access is revoked for terminated employees within SLAs.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that there were no terminated employees during the review period.
	The company ensures that user access to in-scope system components is based on job role and function or requires a documented access request form and manager approval prior to access being provisioned.	Inspected Synadia Communications, Inc.'s access request ticket and history to determine that the company ensures that user access to in-scope system components is based on job role and function or requires a documented access request form and manager approval prior to access being provisioned.	No exceptions noted.

Trust Services Criteria for the Security Category	*Description of Synadia Communications, Inc.'s Controls*	*Service Auditor Test of Controls*	*Results of Service Auditor Test of Controls*
	The company requires authentication to the production network to use unique usernames and passwords or authorized Secure Socket Shell (SSH) keys.	Inspected Synadia Communications, Inc.'s SSL_TLS on the admin page of the infrastructure console to determine that the company requires authentication to the production network to use unique usernames and passwords or authorized Secure Socket Shell (SSH) keys.	No exceptions noted.
CC 6.3 The entity authorizes, modifies, or removes access to data, software, functions, and other protected information assets based on roles, responsibilities, or the system design and changes, giving consideration to the concepts of least privilege and segregation of duties, to meet the entity's objectives.	The company's access control policy documents the requirements for the following access control functions: adding new users, modifying users, and/or removing an existing user's access.	Inspected Synadia Communications, Inc.'s Access Control Policy to determine that the company's policy documents the requirements for the following access control functions: adding new users, modifying users, and/or removing an existing user's access.	No exceptions noted.
	The company conducts access reviews at least quarterly for the in-scope system components to help ensure that access is restricted appropriately. Required changes are tracked to completion.	Inspected Synadia Communications, Inc.'s completed access reviews to determine that it is being conducted at least quarterly for the in-scope system components to help ensure that access is restricted appropriately. Required changes are tracked to completion.	No exceptions noted.
	The company completes termination checklists to ensure that access is revoked for terminated employees within SLAs.	Inspected Synadia Communications, Inc.'s employee termination checklist to determine that the company completes termination checklists to ensure that access is revoked for terminated employees within SLAs.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that there were no terminated employees during the review period.
	The company ensures that user access to in-scope system components is based on job role and function or requires a documented access request form and manager approval prior to access being provisioned.	Inspected Synadia Communications, Inc.'s access request ticket and history to determine that the company ensures that user access to in-scope system components is based on job role and function or requires a documented access request form and manager approval prior to access being provisioned.	No exceptions noted.
	The company requires authentication to the production network to use unique usernames and passwords or authorized Secure Socket Shell (SSH) keys.	Inspected Synadia Communications, Inc.'s SSL_TLS on the admin page of the infrastructure console to determine that the company requires authentication to the production network to use unique usernames and passwords or authorized Secure Socket Shell (SSH) keys.	No exceptions noted.
CC 6.4 The entity restricts physical access to facilities and protected information assets (for example, data center facilities, backup media storage, and other sensitive locations) to authorized personnel to meet the entity's objectives.	The entity does not operate any physical hardware such as servers and network devices but rather uses subservice organizations and relies on its own controls for physical access.	Not Applicable - Control is implemented and maintained by subservice organizations.	No exceptions noted.
CC 6.5 The entity discontinues logical and physical protections over physical assets only after the ability to read or recover data and software from those assets has been diminished and is no longer required to meet the entity's objectives.	The company has electronic media containing confidential information purged or destroyed in accordance with best practices, and certificates of destruction are issued for each device destroyed.	Inspected Synadia Communications, Inc.'s Asset Management Policy to determine that the company has electronic media containing confidential information purged or destroyed in accordance with best practices, and certificates of destruction are issued for each device destroyed.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that no media/devices were required for destruction during the review period.

Trust Services Criteria for the Security Category	*Description of Synadia Communications, Inc.'s Controls*	*Service Auditor Test of Controls*	*Results of Service Auditor Test of Controls*
	The company has formal retention and disposal procedures in place to guide the secure retention and disposal of company and customer data.	Inspected Synadia Communications, Inc.'s Data Management Policy to determine that the company has formal retention and disposal procedures in place to guide the secure retention and disposal of company and customer data.	No exceptions noted.
	The company purges or removes customer data containing confidential information from the application environment, in accordance with best practices, when customers leave the service.	Inspected Synadia Communications, Inc.'s Data Management Policy to determine that the company purges or removes customer data containing confidential information from the application environment, in accordance with best practices, when customers leave the service.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that no customer data deletion occurred during the review period.
	The company completes termination checklists to ensure that access is revoked for terminated employees within SLAs.	Inspected Synadia Communications, Inc.'s employee termination checklist to determine that the company completes termination checklists to ensure that access is revoked for terminated employees within SLAs.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that there were no terminated employees during the review period.
CC 6.6 The entity implements logical access security measures to protect against threats from sources outside its system boundaries.	The company requires authentication to the production network to use unique usernames and passwords or authorized Secure Socket Shell (SSH) keys.	Inspected Synadia Communications, Inc.'s SSL_TLS on the admin page of the infrastructure console to determine that the company requires authentication to the production network to use unique usernames and passwords or authorized Secure Socket Shell (SSH) keys.	No exceptions noted.
	The company's production systems can only be remotely accessed by authorized employees possessing a valid multi-factor authentication (MFA) method.	Inspected Synadia Communications, Inc.'s multi-factor authentication to determine that the company's production systems can only be remotely accessed by authorized employees possessing a valid multi-factor authentication (MFA) method.	No exceptions noted.
	The company's production systems can only be remotely accessed by authorized employees via an approved encrypted connection.	Inspected Synadia Communications, Inc.'s SSL/TLS on the admin page of the infrastructure console to determine that the company's production systems can only be remotely accessed by authorized employees via an approved encrypted connection.	No exceptions noted.
	The company uses an intrusion detection system to provide continuous monitoring of the company's network and early detection of potential security breaches.	Inspected Synadia Communications, Inc.'s intrusion detection system to determine that the company provides continuous monitoring of the company's network and early detection of potential security breaches.	No exceptions noted.
	The company uses secure data transmission protocols to encrypt confidential and sensitive data when transmitted over public networks.	Inspected Synadia Communications, Inc.'s secure data transmission protocols to determine that they encrypt confidential and sensitive data when transmitted over public networks.	No exceptions noted.
	The company reviews its firewall rulesets at least annually. Required changes are tracked to completion.	Inspected Synadia Communications, Inc.'s network firewall to determine that the company reviews its firewall rulesets at least annually. Required changes are tracked to completion.	No exceptions noted.
	The company uses firewalls and configures them to prevent unauthorized access.	Inspected Synadia Communications, Inc.'s firewall configurations to determine that the company uses firewalls and configures them to prevent unauthorized access.	No exceptions noted.

Trust Services Criteria for the Security Category	*Description of Synadia Communications, Inc.'s Controls*	*Service Auditor Test of Controls*	*Results of Service Auditor Test of Controls*
	The company's network and system hardening standards are documented, based on industry best practices, and reviewed at least annually.	Inspected Synadia Communications, Inc.'s network and system hardening standards to determine that the company standards are documented, based on industry best practices, and reviewed at least annually.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that the review of the Operations Security Policy was conducted outside of the review period on April 23, 2024.
	The company has infrastructure supporting the service patched as a part of routine maintenance and as a result of identified vulnerabilities to help ensure that servers supporting the service are hardened against security threats.	Inspected Synadia Communications, Inc.'s Vulnerability scan to determine that the company has infrastructure supporting the service patched as a part of routine maintenance and as a result of identified vulnerabilities to help ensure that servers supporting the service are hardened against security threats.	No exceptions noted.
CC 6.7 The entity restricts the transmission, movement, and removal of information to authorized internal and external users and processes, and protects it during transmission, movement, or removal to meet the entity's objectives.	The company uses secure data transmission protocols to encrypt confidential and sensitive data when transmitted over public networks.	Inspected Synadia Communications, Inc.'s secure data transmission protocols to determine that they encrypt confidential and sensitive data when transmitted over public networks.	No exceptions noted.
CC 6.8 The entity implements controls to prevent or detect and act upon the introduction of unauthorized or malicious software to meet the entity's objectives.	The company has a formal systems development life cycle (SDLC) methodology in place that governs the development, acquisition, implementation, changes (including emergency changes), and maintenance of information systems and related technology requirements.	Inspected Synadia Communications, Inc.'s Secure Development Policy to determine that it governs the development, acquisition, implementation, changes, and maintenance of information systems and related technology requirements.	No exceptions noted.
	The company has infrastructure supporting the service patched as a part of routine maintenance and as a result of identified vulnerabilities to help ensure that servers supporting the service are hardened against security threats.	Inspected Synadia Communications, Inc.'s Vulnerability scan to determine that the company has infrastructure supporting the service patched as a part of routine maintenance and as a result of identified vulnerabilities to help ensure that servers supporting the service are hardened against security threats.	No exceptions noted.
System Operations			
CC 7.1 To meet its objectives, the entity uses detection and monitoring procedures to identify (1) changes to configurations that result in the introduction of new vulnerabilities, and (2) susceptibilities to newly discovered vulnerabilities.	The company has a configuration management procedure in place to ensure that system configurations are deployed consistently throughout the environment.	Inspected Synadia Communications, Inc.'s configuration management procedure to determine that the company ensures that system configurations are deployed consistently throughout the environment.	No exceptions noted.
	The company requires changes to software and infrastructure components of the service to be authorized, formally documented, tested, reviewed, and approved prior to being implemented in the production environment.	Inspected Synadia Communications, Inc.'s code changes to determine that the company requires changes to software and infrastructure components of the service to be authorized, formally documented, tested, reviewed, and approved prior to being implemented in the production environment.	No exceptions noted.

Trust Services Criteria for the Security Category	*Description of Synadia Communications, Inc.'s Controls*	*Service Auditor Test of Controls*	*Results of Service Auditor Test of Controls*
	The company's formal policies outline the requirements for the following functions related to IT / Engineering: vulnerability management and system monitoring.	Inspected Synadia Communications, Inc.'s Operations Security Policy to determine that the company's formal policies outline the requirements for the following functions related to IT / Engineering: vulnerability management and system monitoring.	No exceptions noted.
	The company's risk assessments are performed at least annually. As part of this process, threats and changes (environmental, regulatory, and technological) to service commitments are identified and the risks are formally assessed. The risk assessment includes a consideration of the potential for fraud and how fraud may impact the achievement of objectives.	Inspected Synadia Communications, Inc.'s completed risk assessment exercise to determine that the company's risk assessments are performed at least annually. As part of this process, threats and changes (environmental, regulatory, and technological) to service commitments are identified and the risks are formally assessed.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that the risk assessment was conducted outside of the review period on June 28, 2024.
	Host-based vulnerability scans are performed at least quarterly on all external-facing systems. Critical and high vulnerabilities are tracked for remediation.	Inspected Synadia Communications, Inc.'s host-based vulnerability scans to determine that it is performed at least quarterly on all external-facing systems. Critical and high vulnerabilities are tracked for remediation.	No exceptions noted.
CC 7.2 The entity monitors system components and the operation of those components for anomalies that are indicative of malicious acts, natural disasters, and errors affecting the entity's ability to meet its objectives; anomalies are analyzed to determine whether they represent security events.	The company's penetration testing is performed at least annually. A remediation plan is developed and changes are implemented to remediate vulnerabilities in accordance with SLAs.	Inspected Synadia Communications, Inc.'s penetration test report to determine that the company's penetration testing is performed at least annually. A remediation plan is developed and changes are implemented to remediate vulnerabilities in accordance with SLAs.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that the penetration testing was conducted outside the review period on December 1, 2023.
	The company uses an intrusion detection system to provide continuous monitoring of the company's network and early detection of potential security breaches.	Inspected Synadia Communications, Inc.'s intrusion detection system to determine that the company provides continuous monitoring of the company's network and early detection of potential security breaches.	No exceptions noted.
	The company utilizes a log management tool to identify events that may have a potential impact on the company's ability to achieve its security objectives.	Inspected Synadia Communications, Inc.'s log management tool to determine that the company utilizes it to identify events that may have a potential impact on the company's ability to achieve its security objectives.	No exceptions noted.
	An infrastructure monitoring tool is utilized to monitor systems, infrastructure, and performance and generates alerts when specific predefined thresholds are met.	Inspected Synadia Communications, Inc.'s infrastructure monitoring tool to determine that it is utilized to monitor systems, infrastructure, and performance and generates alerts when specific predefined thresholds are met.	No exceptions noted.
	The company's formal policies outline the requirements for the following functions related to IT / Engineering: vulnerability management and system monitoring.	Inspected Synadia Communications, Inc.'s Operations Security Policy to determine that the company's formal policies outline the requirements for the following functions related to IT / Engineering: vulnerability management and system monitoring.	No exceptions noted.
	The company has infrastructure supporting the service patched as a part of routine maintenance and as a result of identified vulnerabilities to help ensure that servers supporting the service are hardened against security threats.	Inspected Synadia Communications, Inc.'s Vulnerability scan to determine that the company has infrastructure supporting the service patched as a part of routine maintenance and as a result of identified vulnerabilities to help ensure that servers supporting the service are hardened against security threats.	No exceptions noted.

Trust Services Criteria for the Security Category	*Description of Synadia Communications, Inc.'s Controls*	*Service Auditor Test of Controls*	*Results of Service Auditor Test of Controls*
	Host-based vulnerability scans are performed at least quarterly on all external-facing systems. Critical and high vulnerabilities are tracked for remediation.	Inspected Synadia Communications, Inc.'s host-based vulnerability scans to determine that it is performed at least quarterly on all external-facing systems. Critical and high vulnerabilities are tracked for remediation.	No exceptions noted.
CC 7.3 The entity evaluates security events to determine whether they could or have resulted in a failure of the entity to meet its objectives (security incidents) and, if so, takes actions to prevent or address such failures.	The company has security and privacy incident response policies and procedures that are documented and communicated to authorized users.	Inspected Synadia Communications, Inc.'s Incident Response Plan to determine that the company has security and privacy incident response policies and procedures that are documented and communicated to authorized users.	No exceptions noted.
	The company's security and privacy incidents are logged, tracked, resolved, and communicated to affected or relevant parties by management according to the company's security incident response policy and procedures.	Inspected Synadia Communications, Inc.'s list of security and privacy incidents to determine that the company's security and privacy incidents are logged, tracked, resolved, and communicated to affected or relevant parties by management according to the company's security incident response policy and procedures.	No exceptions noted.
CC 7.4 The entity responds to identified security incidents by executing a defined incident response program to understand, contain, remediate, and communicate security incidents, as appropriate.	The company tests its incident response plan at least annually.	Inspected Synadia Communications, Inc.'s test of incident response plan to determine that the company test it at least annually.	No exceptions noted.
	The company has security and privacy incident response policies and procedures that are documented and communicated to authorized users.	Inspected Synadia Communications, Inc.'s Incident Response Plan to determine that the company has security and privacy incident response policies and procedures that are documented and communicated to authorized users.	No exceptions noted.
	The company's security and privacy incidents are logged, tracked, resolved, and communicated to affected or relevant parties by management according to the company's security incident response policy and procedures.	Inspected Synadia Communications, Inc.'s list of security and privacy incidents to determine that the company's security and privacy incidents are logged, tracked, resolved, and communicated to affected or relevant parties by management according to the company's security incident response policy and procedures.	No exceptions noted.
	The company has infrastructure supporting the service patched as a part of routine maintenance and as a result of identified vulnerabilities to help ensure that servers supporting the service are hardened against security threats.	Inspected Synadia Communications, Inc.'s Vulnerability scan to determine that the company has infrastructure supporting the service patched as a part of routine maintenance and as a result of identified vulnerabilities to help ensure that servers supporting the service are hardened against security threats.	No exceptions noted.
	Host-based vulnerability scans are performed at least quarterly on all external-facing systems. Critical and high vulnerabilities are tracked for remediation.	Inspected Synadia Communications, Inc.'s host-based vulnerability scans to determine that it is performed at least quarterly on all external-facing systems. Critical and high vulnerabilities are tracked for remediation.	No exceptions noted.

Trust Services Criteria for the Security Category	*Description of Synadia Communications, Inc.'s Controls*	*Service Auditor Test of Controls*	*Results of Service Auditor Test of Controls*
CC 7.5 The entity identifies, develops, and implements activities to recover from identified security incidents.	The company has a documented business continuity/disaster recovery (BC/DR) plan and tests it at least annually.	Inspected Synadia Communications, Inc.'s tabletop disaster recovery exercise to determine that the company has a documented business continuity/disaster recovery (BC/DR) plan and tests it at least annually.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that the tabletop disaster recovery exercise was conducted outside of the review period in May 2024.
	The company tests its incident response plan at least annually.	Inspected Synadia Communications, Inc.'s test of incident response plan to determine that the company tests it at least annually.	No exceptions noted.
	The company has security and privacy incident response policies and procedures that are documented and communicated to authorized users.	Inspected Synadia Communications, Inc.'s Incident Response Plan to determine that the company has security and privacy incident response policies and procedures that are documented and communicated to authorized users.	No exceptions noted.
	The company's security and privacy incidents are logged, tracked, resolved, and communicated to affected or relevant parties by management according to the company's security incident response policy and procedures.	Inspected Synadia Communications, Inc.'s list of security and privacy incidents to determine that the company's security and privacy incidents are logged, tracked, resolved, and communicated to affected or relevant parties by management according to the company's security incident response policy and procedures.	No exceptions noted.
Change Management			
CC 8.1 The entity authorizes, designs, develops or acquires, configures, documents, tests, approves, and implements changes to infrastructure, data, software, and procedures to meet its objectives.	The company requires changes to software and infrastructure components of the service to be authorized, formally documented, tested, reviewed, and approved prior to being implemented in the production environment.	Inspected Synadia Communications, Inc.'s code changes to determine that the company requires changes to software and infrastructure components of the service to be authorized, formally documented, tested, reviewed, and approved prior to being implemented in the production environment.	No exceptions noted.
	The company restricts access to migrate changes to production to authorized personnel.	Inspected Synadia Communications, Inc.'s production deployment to determine that the company restricts access to migrate changes to production to authorized personnel.	No exceptions noted.
	The company has a formal systems development life cycle (SDLC) methodology in place that governs the development, acquisition, implementation, changes (including emergency changes), and maintenance of information systems and related technology requirements.	Inspected Synadia Communications, Inc.'s Secure Development Policy to determine that it governs the development, acquisition, implementation, changes, and maintenance of information systems and related technology requirements.	No exceptions noted.
	The company's penetration testing is performed at least annually. A remediation plan is developed and changes are implemented to remediate vulnerabilities in accordance with SLAs.	Inspected Synadia Communications, Inc.'s penetration test report to determine that the company's penetration testing is performed at least annually. A remediation plan is developed and changes are implemented to remediate vulnerabilities in accordance with SLAs.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that the penetration testing was conducted outside the review period on December 1, 2023.

Trust Services Criteria for the Security Category	*Description of Synadia Communications, Inc.'s Controls*	*Service Auditor Test of Controls*	*Results of Service Auditor Test of Controls*
	The company's network and system hardening standards are documented, based on industry best practices, and reviewed at least annually.	Inspected Synadia Communications, Inc.'s network and system hardening standards to determine that the company standards are documented, based on industry best practices, and reviewed at least annually.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that the review of the Operations Security Policy was conducted outside of the review period on April 23, 2024.
	The company has infrastructure supporting the service patched as a part of routine maintenance and as a result of identified vulnerabilities to help ensure that servers supporting the service are hardened against security threats.	Inspected Synadia Communications, Inc.'s Vulnerability scan to determine that the company has infrastructure supporting the service patched as a part of routine maintenance and as a result of identified vulnerabilities to help ensure that servers supporting the service are hardened against security threats.	No exceptions noted.
	Host-based vulnerability scans are performed at least quarterly on all external-facing systems. Critical and high vulnerabilities are tracked for remediation.	Inspected Synadia Communications, Inc.'s host-based vulnerability scans to determine that it is performed at least quarterly on all external-facing systems. Critical and high vulnerabilities are tracked for remediation.	No exceptions noted.
Risk Mitigation			
CC 9.1 The entity identifies, selects, and develops risk mitigation activities for risks arising from potential business disruptions.	The company has Business Continuity and Disaster Recovery Plans in place that outline communication plans in order to maintain information security continuity in the event of the unavailability of key personnel.	Inspected Synadia Communications, Inc.'s Information Security Policy to determine that the company has a policy in place that outlines communication plans in order to maintain information security continuity in the event of the unavailability of key personnel.	No exceptions noted.
	The company maintains cybersecurity insurance to mitigate the financial impact of business disruptions.	Inspected Synadia Communications, Inc.'s cybersecurity insurance policy document to determine that the company maintains cybersecurity insurance to mitigate the financial impact of business disruptions.	No exceptions noted.
	The company's risk assessments are performed at least annually. As part of this process, threats and changes (environmental, regulatory, and technological) to service commitments are identified and the risks are formally assessed. The risk assessment includes a consideration of the potential for fraud and how fraud may impact the achievement of objectives.	Inspected Synadia Communications, Inc.'s completed risk assessment exercise to determine that the company's risk assessments are performed at least annually. As part of this process, threats and changes (environmental, regulatory, and technological) to service commitments are identified and the risks are formally assessed.	No events to test. Note: Testing of the control activity disclosed that the control was suitably designed and that the risk assessment was conducted outside of the review period on June 28, 2024.
	The company has a documented risk management program in place that includes guidance on the identification of potential threats, rating the significance of the risks associated with the identified threats, and mitigation strategies for those risks.	Inspected Synadia Communications, Inc.'s Third-Party Management Policy to determine that the company has a documented risk management program in place that includes guidance on the identification of potential threats, rating the significance of the risks associated with the identified threats, and mitigation strategies for those risks.	No exceptions noted.
CC 9.2 The entity assesses and manages risks associated with vendors and business partners.	The company has written agreements in place with vendors and related third parties. These agreements include confidentiality and privacy commitments applicable to that entity.	Inspected Synadia Communications, Inc.'s Publicly available terms of service to determine that the company has written agreements in place with vendors and related third parties. These agreements include confidentiality and privacy commitments applicable to that entity.	No exceptions noted.

Trust Services Criteria for the Security Category	*Description of Synadia Communications, Inc.'s Controls*	*Service Auditor Test of Controls*	*Results of Service Auditor Test of Controls*
	The company has a vendor management program in place. Components of this program include: critical third-party vendor inventory, vendor's security and privacy requirements, and review of critical third-party vendors at least annually.	Inspected Synadia Communications, Inc.'s vendor management program to determine that the company has a vendor management program in place. Components of this program include: critical third-party vendor inventory, vendor's security and privacy requirements, and review of critical third-party vendors at least annually.	No exceptions noted.