

LEGAL POLICY

SMS Sender ID Register — Compliance &

1.1

How Real World complies with the SMS Sender ID Register Industry Standard 2025 (sections 19 and 20), and how we handle complaints.

DATE

1 July 2026

ABN

74 101 234 664

Purpose and scope

This document sets out how Real World Technology Solutions Pty Ltd (RWTS) complies with the Telecommunications (SMS Sender ID register) Industry Standard 2025 (the Standard), and how RWTS deals with, records and resolves complaints connected to the SMS Sender ID Register.

It covers the obligations that apply to RWTS under the Standard, including:

- Section 19 — implement policies and procedures to comply with all applicable obligations;
- Section 20 — implement policies and procedures to deal with, record and resolve complaints; and
- the additional Certified-telco duties (Sections 12 and 13) that apply because RWTS is approved to register sender IDs for non-ABN entities and international partners.

RWTS is a Carriage Service Provider operating its own carrier-grade network (AS45437), and participates in the SMS Sender ID Register. RWTS is approved under section 484F of the Telecommunications Act 1997, is approved as a Certified telco under section 7 of the SMS Sender ID Register (Application, Access and Administration) Determination 2025, and appears on the ACMA's list of approved telcos and message providers. Depending on the traffic, RWTS participates as an originating telco (including as a Certified telco), a transiting telco, and a carriage telco — including for partner telcos who send SMS through RWTS as part of their own SMS gateway and white-label offerings. This document covers RWTS's obligations across all of those roles.

RWTS does not operate a mobile network and does not deliver SMS to recipient handsets, so it is not a terminating telco under the Standard. Inbound SMS that RWTS receives over webhooks (for example, replies routed into a customer's helpdesk) is delivered to RWTS by an upstream mobile provider; that provider is the terminating telco, not RWTS.

This policy is reviewed at least annually, and whenever the Standard, RWTS's systems, or RWTS's participation in the Register materially change.

Part A — Compliance policy (Section 19)

A.1 Roles and responsibilities

The Managing Director holds overall accountability for RWTS's compliance with the Standard. Day-to-day responsibility sits with the nominated SMS Sender ID Register compliance owner, supported by the network engineering and support teams who run the SMS platform and the interconnects.

The compliance owner maintains this policy, keeps RWTS's entry on the ACMA approved list current, lodges the quarterly reports, responds to ACMA information requests, and makes sure the controls below are in place and working.

A.2 Participation and approval

RWTS participates in the Register only in the roles for which it holds approval. It is approved under section 484F of the Telecommunications Act 1997 as an originating telco, and approved under section 7 of the SMS Sender ID Register (Application, Access and Administration) Determination 2025 as a Certified telco. It does not send, transit or terminate sender ID messages in a way that needs an approval it doesn't hold.

Before taking on a new mode of participation, RWTS confirms it holds the relevant approval and updates this policy.

A.3 Registering and verifying sender IDs (originating role)

RWTS registers alphanumeric sender IDs for entities with a valid Australian Business Number (ABN), and — as a Certified telco — for recognised entities that don't hold an ABN. RWTS is a Certified telco, approved under section 7 of the SMS Sender ID Register (Application, Access and Administration) Determination 2025, which lets it register sender IDs on behalf of non-ABN entities (and entities that ask to be treated as non-ABN) and for international partners. The additional verification and notice duties that come with that role are set out in Part C.

Before submitting each sender ID registration application to the ACMA for an ABN entity, RWTS completes a valid use-case verification under Section 11 of the Standard. For non-ABN entities, the different verification set under Section 12(4) applies — see Part C.

Before enabling any account to send sender ID messages, RWTS confirms all of the following under Section 16:

- the sender ID is registered on the SMS Sender ID Register;
- the person asking for the account to be enabled is authorised by the entity the sender ID is registered to; and
- RWTS is authorised, via the Register, to send messages for that sender ID.

If any of these can't be confirmed, the account is not enabled to send that sender ID.

A.4 Disruption of non-conforming messages

Where a sender ID message doesn't meet the confirmation requirements in A.3 — in particular, where the sender ID isn't registered — RWTS disrupts the message by over-stamping it with a new sender ID of "Unverified", under Section 16.

A.5 Transiting role

When RWTS transits sender ID messages between other telcos, it transits a message only where it has confirmed that both the telco sending the message and the telco the message is being transited to are participating in the Register, under Section 17. RWTS checks participation against the ACMA's published list of approved telcos and message providers.

RWTS applies the exemptions in Section 17(3) and (4): where a message is bound for a mobile number using an international mobile roaming service, and where a message is received from an international telecommunications service provider that RWTS has over-stamped with "Unverified".

A.6 Partner arrangements

Where another telco sends SMS through RWTS as part of that telco's gateway or white-label offering, or where RWTS relies on another telco to fulfil obligations (or another telco relies on RWTS), the split of obligations under the Standard is recorded in a written contractual arrangement, consistent with Section 13. Each arrangement makes clear which party carries the originating obligations for the relevant traffic.

International-partner arrangements for registering sender IDs on behalf of non-ABN entities are covered separately in Part C.

A.7 Customer information and notifications (originating role)

RWTS communicates information about the SMS Sender ID Register as required by Sections 9 and 10 and Schedule 1 of the Standard:

- the information is published on the Real World website;
- it is communicated in writing to a customer when they request a new sender ID; and
- existing customers using sender IDs are notified in writing.

RWTS's public-facing communications do not inaccurately describe the matters set out in Sections 14 and 15.

A.8 Scam identification and notification

When RWTS identifies a scam communication, it notifies the ACMA in writing within two business days, under Section 21. Where RWTS is acting in a transiting role, it also notifies the telco that sent the message within the same period.

A.9 Security and privacy

RWTS takes all reasonable steps to keep its IT systems and processes secure, in particular the systems used for sending sender ID messages and for interacting with the Register, under Part 25 of the Standard. RWTS notifies the ACMA in writing as soon as practicable after becoming aware of a breach or suspected breach of security.

RWTS is subject to the Privacy Act 1988 and handles personal information in line with the Real World Group privacy policy.

A.10 Records, reporting and information requests

RWTS keeps records demonstrating compliance with the Standard for a minimum of two years, maintains the privacy and integrity of those records, and securely destroys them when they're no longer required, under Part 6.

RWTS lodges its SMS Sender ID Register quarterly report with the ACMA within 20 business days after the end of each quarter, under Section 22. This report is separate from RWTS's other carrier reporting. Where there is no reportable sender ID activity for a quarter, RWTS lodges a nil return.

RWTS makes compliance records available to the ACMA within five business days of a written request, under Sections 23 and 24.

A.11 Testing and readiness

RWTS has tested its systems and processes to confirm they perform and meet the compliance obligations under the Standard from 1 July 2026. Material changes to the SMS platform or the Register interface are tested for continued compliance before they go live.

Part C — Certified telco obligations (Sections 12 and 13)

RWTS is a Certified telco, approved under section 7 of the SMS Sender ID Register (Application, Access and Administration) Determination 2025. This Part covers the additional duties that come with that role: registering sender IDs for non-ABN entities, and registering on behalf of international partners. These add to the originating obligations in Part A — they don't replace them.

In practice, RWTS expects to use its Certified status sparingly — mainly to register sender IDs for recognised organisations it works with that don't hold an ABN, such as smaller community and not-for-profit bodies. The verification below applies to every non-ABN registration regardless of volume.

C.1 Verifying a non-ABN entity (Section 12(4))

Before submitting each sender ID registration application to the ACMA on behalf of a non-ABN entity — including an entity that asks to be treated as a non-ABN entity — RWTS confirms all of the following:

- **Identity of the requester.** RWTS verifies the identity of the person making the request on behalf of the entity, using an ID verification service.
- **Authority.** RWTS confirms that person is an authorised representative of the entity.
- **Recognition.** RWTS confirms the entity is officially recognised or certified by a governing body, regulatory authority or accreditation organisation in the country where the entity is based.
- **Valid use case.** RWTS confirms the entity has a valid use case for the sender ID, by checking the sender ID matches the entity's trademark register, or its entry in an official register or record, in the country where the entity is based.

If any of these can't be confirmed, RWTS does not submit the registration.

C.2 Keeping non-ABN contact details current (Section 12(6))

For every non-ABN entity RWTS has registered a sender ID for, RWTS keeps the contact details held in the Register — including the email address — current. RWTS reviews these details periodically and updates them when it becomes aware of a change.

C.3 International partner arrangements (Section 13(1)–(4))

Where RWTS deals with international telcos that send sender ID messages for non-ABN entities, and RWTS registers those sender IDs on their behalf, RWTS enters into written contractual arrangements with those telcos so they become its international partners. RWTS registers sender IDs for an international partner only under such an arrangement.

C.4 Partner notices — 24-hour turnarounds (Section 13(6))

RWTS meets two time-bound duties for its international and EMSP partners:

- **Decision notices.** When RWTS receives a notice of decision from the ACMA about a sender ID registration application made on a partner's behalf, RWTS passes that notice to the partner within 24 hours of receiving it.

- **Removal requests.** When a partner asks RWTS to remove a sender ID from the Register, RWTS actions that request within 24 hours of receiving it.

These turnarounds are tighter than RWTS's other reporting timeframes, so partner notices and removal requests are handled as priority items by the compliance owner.

Part B — Complaints policy (Section 20)

This Part sets out how RWTS deals with, records and resolves complaints connected to the SMS Sender ID Register, as required by Section 20.

B.1 What this covers

This policy covers complaints about RWTS's handling of sender ID messages and sender ID registrations under the Standard — for example, a sender ID that was disrupted or over-stamped as “Unverified”, a delay or problem registering a sender ID, or a message a complainant believes should or should not have been carried.

B.2 How to make a complaint

A complaint can be made:

- by phone on 1300 798 718;
- by email to support@rwts.com.au; or
- through the Real World helpdesk.

A complaint doesn't need to be in any particular form. RWTS accepts complaints from customers, partner telcos, message recipients and the ACMA.

B.3 How RWTS handles a complaint

When a complaint comes in, RWTS:

- records it in the support and ticketing system, with the date received, the complainant, and the substance of the complaint;
- acknowledges the complaint to the complainant;
- assigns it to the right person — sender ID and Register matters are escalated to the SMS Sender ID Register compliance owner;
- investigates, including reviewing the relevant message and registration records; and
- resolves the complaint and tells the complainant the outcome.

Where a complaint reveals a compliance issue, the compliance owner makes sure it's corrected and considers whether any change to RWTS's systems or procedures is needed to stop it happening again.

B.4 Records

RWTS records each complaint and its resolution, and keeps those records for a minimum of two years, consistent with Part 6. Complaint records are available to the ACMA on request within the timeframes in A.10.

B.5 Privacy

Personal information collected in handling a complaint is managed under the Privacy Act 1988 and the Real World Group privacy policy. It is not disclosed to a third party except as required to manage the complaint, with the person's express consent, or where required or authorised by Australian law or a court order.

B.6 Escalation

If a complainant isn't satisfied with the outcome, they can ask for the matter to be escalated to the compliance owner or the Managing Director. Complaints about RWTS's compliance with the Standard can also be raised with the ACMA at SenderIDRegister@acma.gov.au.