Code of Conduct

A2P Messaging

SMS and RCS for Business Messaging

TI SMS Aggregator Working Group

15 April 2026

Content

Code of Conduct

1. Purpose

The purpose of the CoC is to establish a set of rules between SMS- and RCS for Business actors, to protect Danish end users, being either people or businesses, from malicious A2P Messaging. It aims to protect and improve the trust of SMS and RCS for Business for all parties to the benefit of the industry and population of Denmark.

The Rules have been agreed by the SMS Aggregator Working Group which is a part of The Telecom Industry Association Denmark (Teleindustrien). Any SMS Aggregator providing services in Denmark can be a member of the Working Group and The CoC/Rules is open for any SMS Aggregator to sign.

SMS Aggregators who want to sign the CoC and get access to information regarding blocking of SMS traffic with false or dodgy "look alike" sender-IDs (cf. point 5 in this CoC) can contact The Telecom Industry Association Denmark at post@teleindu.dk for further information.

This version of the Code of Conduct has been agreed by the Working Group the 15 April 2026

Mobile Operators who are members of The Telecom Industry Association Denmark will refer to the Code of Conduct as a precondition for exchanging SMS traffic with SMS Aggregators.

2. Risks

To protect the trust of A2P SMS and RCS for Business this Code of Conduct (CoC) aims to describe elements and actions of what is expected of the signing parties. The focus areas are derived with a wish to limit the risk of deteriorating the trust in the two communication channels.

The risks that the CoC aims to mitigate are all risks that are deemed by the parties to be significant and relevant to combat. Over time this list will be updated to reflect new trends in the market. The risks are currently (but not limited to)

- Smishing (SMS Phishing)
- SPAM
- AIT (Artificially Inflated Traffic)
- Grey Routing
- Spoofing
- SIM Farms

3. Laws and Regulations

All parties operating under this Code of Conduct will at all times ensure that they comply with applicable laws and regulation regarding the provision of telecommunications services in Denmark.

This includes both general legislation such as (and not limited to) The Marketing Act (Markedsføringsloven) and The Competition Act (Konkurrenceloven) and specific regulation such as The Gambling Act (Spilleloven), The Telecom Act (Teleloven), and The Act on Net- and Information Security (Net- og informationssikkerhedsloven).

Providers of A2P SMS services are considered providers of telecommunications networks and services and are as such subject to the sector-specific regulation for telecommunications services.

As a provider of telecommunications services, you must meet the requirements in relevant executive orders such as the executive order on information requirements [https://www.retsinformation.dk/eli/lta/2022/523] and executive order regarding end-user rights in the telecommunications area [https://www.retsinformation.dk/eli/lta/2023/566]. This regulation includes, among other things, requirements regarding maximum commitment period for end-users.

Providers are also obliged to register with the police's central data section https://politi.dk/drift-af-virksomhed/indberet-udbydervirksomhed and to comply with the Ministry of Justice's regulation regarding data retention.

Furthermore, some providers of telecommunications services [larger and with specific end-users] are obliged to inform Center for Cyber Security in the event of security incidents [https://www.retsinformation.dk/eli/lta/2023/1414]

4. Know Your Customer (KYC)

All parties operating under this Code of Conduct must ensure to have an adequate and risk-based approach for their Know Your Customer (KYC) process. A2P messaging is a business-to-business ecosystem and therefore participants of this Code of Conduct are expected to do business with other companies hence the KYC process has to be designed for this purpose. It is important that each participant knows who they are dealing with as new and existing customers gain access to mass communication via SMS or RCS to the population of Denmark. The process is expected to be formalised and documented by each participant.

As a participant of this Code of Conduct you must ensure that the information gathered as part of the KYC process includes, as a minimum, controls for normal invoicing details and a check of validity of the counterpart and their ability to send secure and trustworthy messaging.

It is recognised under this Code of Conduct that an integral part of the A2P business is prepayment via credit cards where the KYC process lies with a third-party service provider. It is expected under this agreement that such setups are specifically risk assessed as part of the KYC process.

Some participants of the Code of Conduct may also offer free test credits; in such cases it is important that the participant ensures adequate risk mitigations.

5. Traffic

All SMS Aggregators operating under this Code of Conduct must take adequate steps to minimize the amount of fraudulent SMS traffic generated in their systems or transmitted via the SMS Aggregators services. This includes

a. Blocking of traffic with false sender-IDs

SMS Aggregators shall block traffic in their systems from the top100 sender-IDs used in Denmark if the SMS Aggregator does not have the specific sender-ID as a customer or can identify the traffic with the specific sender-ID as legitimate traffic.

The list of the top100+ sender-IDs used in Denmark is generated and maintained in the TI SMS Aggregator Working Group.

Blockings must be implemented without undue delay.

b. Blocking of traffic with dodgy "look alike" sender-IDs

SMS Aggregators shall block traffic in their systems from dodgy "look alike" sender-IDs that is being used for fraud.

Information about dodgy "look alike" sender-IDs is reported between SMS Aggregators via a mailing list. All SMS Aggregators must subscribe to the mailing list in order to be compliant with the CoC.

Blocking of reported dodgy "look alike" sender-IDs must be implemented within 48h.