

NSN Global Services LLC
Annual Conflict Minerals Statement 2025
Version 1.0**Introduction**

NSN Global Services, registered in Dover, Delaware, United States, is a global provider of technological solutions dedicated to advancing education through primarily digital infrastructure, development, and deployment services. Our operations span the United States, United Kingdom, European Union, Australia, India, Africa, and the Middle East, where we support educational institutions, governments, businesses, and individuals with innovative digital tools aimed at enhancing learning accessibility and efficiency.

This Annual Conflict Minerals Statement for 2025 addresses our approach to conflict minerals during the reporting period. Conflict minerals, as defined under U.S. law, include tin, tantalum, tungsten, and gold (collectively, 3TG) sourced from conflict-affected and high-risk areas, such as the Democratic Republic of the Congo (DRC) and adjoining countries. Given our focus on digital services, our direct involvement with physical products containing 3TG is limited; however, we may indirectly engage with such minerals through third-party suppliers for occasional hardware components or supporting infrastructure. We guarantee full compliance with applicable conflict minerals regulations across jurisdictions, conducting due diligence where relevant to ensure responsible sourcing. This statement makes no forward-looking commitments but guarantees our adherence to legal requirements, including Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act and related rules from the U.S. Securities and Exchange Commission (SEC). It aligns with international guidelines such as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and is published for transparency to stakeholders.

Applicability and Scope

As a private LLC primarily offering digital edutech services, NSN Global Services LLC does not manufacture or contract to manufacture products that typically contain conflict minerals as essential components. Our core offerings—such as software platforms, cloud-based learning tools, and digital deployment services—do not require 3TG in their functionality. However, in limited instances where we procure hardware (e.g., servers, devices for testing, or ancillary equipment from third parties), we assess the potential presence of conflict minerals.

The scope of this statement covers our global operations and supply chain for the calendar year 2025, focusing on any sourced materials or components that could contain 3TG. We guarantee that, to the extent applicable, our practices comply with U.S. federal requirements under Dodd-Frank Section 1502, which mandates disclosure and due diligence for conflict minerals originating from the DRC or adjoining countries (Covered Countries: Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia). Additionally, we align with emerging international standards, such as the EU Conflict Minerals Regulation (Regulation (EU) 2017/821), which applies to importers of 3TG into the EU and requires due diligence for minerals from conflict-affected and high-risk areas worldwide.

In regions like Australia, India, Africa, and the Middle East, where specific conflict minerals laws may be less prescriptive, we guarantee voluntary application of OECD principles to maintain consistency across our supply chain, ensuring no support for armed conflict or human rights abuses through mineral sourcing.

Due Diligence Process

NSN Global Services guarantees a risk-based due diligence process for conflict minerals, adapted to our digital-centric business model. This process follows the five-step framework outlined in the OECD Guidance:

- 1. Establish Strong Company Management Systems:** We maintain internal policies integrated into our Supplier Code of Conduct, requiring third-party suppliers to disclose 3TG sourcing information and commit to conflict-free practices. Contracts include clauses mandating compliance with conflict minerals laws, with guarantees of termination rights for non-adherence.
- 2. Identify and Assess Risks in the Supply Chain:** For any procurement involving potential 3TG-containing products, we conduct supplier surveys using standardized tools like the Conflict Minerals Reporting Template (CMRT) developed by the Responsible Minerals Initiative (RMI). Suppliers are required to provide smelter and refiner details, which we cross-check against RMI's Conformant Smelter List or equivalent databases. Risks are assessed based on origin, with heightened scrutiny for materials from Covered Countries or high-risk areas identified by tools like the EU's CAHRA list (Conflict-Affected and High-Risk Areas). In 2025, our assessments confirmed minimal exposure, as hardware procurements were limited and sourced from verified suppliers.

3. Design and Implement a Strategy to Respond to Identified Risks: Where risks are identified, we guarantee mitigation through supplier engagement, such as requesting alternative sourcing or additional certifications. In cases of non-compliance, we escalate to corrective action plans or supplier replacement, ensuring no continuation of high-risk relationships. Our internal compliance team oversees this, with guarantees of documentation for audit purposes.

4. Carry Out Independent Third-Party Audit of Supply Chain Due Diligence: Although not required for private companies under Dodd-Frank, we voluntarily engage independent auditors for high-risk suppliers to verify due diligence practices, aligning with RMI's Responsible Minerals Assurance Process (RMAP) standards. Audits in 2025 focused on any hardware-related chains, confirming conflict-free status where applicable.

5. Report on Supply Chain Due Diligence: This statement serves as our annual report, guaranteeing transparent disclosure of our processes and findings. We file Form SD with the SEC if thresholds are met, though our limited product involvement typically exempts us from full reporting obligations.

Our due diligence extends to global operations, incorporating regional nuances—e.g., aligning with India's voluntary guidelines under the Ministry of Mines or African frameworks like the ICGLR Regional Certification Mechanism in the Great Lakes region.

Sourcing Practices and Findings

In 2025, NSN Global Services' supply chain analysis revealed no direct sourcing of 3TG from Covered Countries. For indirect exposures through third-party hardware (e.g., electronics in data center equipment), suppliers provided CMRTs indicating use of conformant smelters audited by RMAP or equivalent programs like the London Bullion Market Association (LBMA) for gold. We guarantee that all identified smelters were listed as active or conformant on recognized industry lists, with no indications of funding conflict.

Key findings include:

- Zero instances of 3TG sourced from non-conformant smelters.
- Full supplier response rate to our conflict minerals inquiries.
- No adverse human rights impacts linked to our supply chain minerals.

We guarantee ongoing monitoring to maintain these standards, with internal tracking systems ensuring timely updates to sourcing practices.

Continuous Improvement and Stakeholder Engagement

While our digital focus minimizes conflict minerals risks, we guarantee continuous improvement through annual policy reviews and participation in industry forums like the RMI. Stakeholder engagement includes responding to inquiries from clients, particularly educational institutions requiring supply chain assurances, with guarantees of accurate and timely information provision.

Internal training programs educate procurement teams on conflict minerals compliance, ensuring awareness of legal obligations and ethical sourcing principles.

Conclusion

Throughout 2025, NSN Global Services upheld responsible practices regarding conflict minerals, guaranteeing compliance with all applicable laws and standards despite our primarily digital edutech operations. This statement confirms our commitment to conflict-free sourcing and is published on our website for stakeholder transparency. For inquiries related to conflict minerals, please contact us via the channels listed on www.nsnglobalservices.com.

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