

**NSN Global Services LLC
Annual Conflict Minerals Statement 2026
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 2026 addresses our planned approach to conflict minerals for the upcoming 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 intend to maintain full compliance with applicable conflict minerals regulations across jurisdictions, conducting due diligence where relevant to ensure responsible sourcing. This statement outlines aspirational goals without creating binding commitments, intending to align with international guidelines such as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. It 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 plan to assess the potential presence of conflict minerals.

The scope of this statement covers our planned global operations and supply chain for the calendar year 2026, focusing on any sourced materials or components that could contain 3TG. We intend to ensure 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 aim to 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 plan to voluntarily apply 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 intends to implement a risk-based due diligence process for conflict minerals, adapted to our digital-centric business model. This process aims to follow the five-step framework outlined in the OECD Guidance:

- 1. Establish Strong Company Management Systems:** We plan to 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 intend to include clauses mandating compliance with conflict minerals laws, with rights to terminate for non-adherence.
- 2. Identify and Assess Risks in the Supply Chain:** For any procurement involving potential 3TG-containing products, we aim to conduct supplier surveys using standardized tools like the Conflict Minerals Reporting Template (CMRT) developed by the Responsible Minerals Initiative (RMI). Suppliers plan to be required to provide smelter and refiner details, which we intend to cross-check against RMI's Conformant Smelter List or equivalent databases. Risks aim to be 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).
- 3. Design and Implement a Strategy to Respond to Identified Risks:** Where risks are identified, we plan to mitigate through supplier engagement, such as requesting alternative sourcing or additional certifications. In cases of non-compliance, we intend

to escalate to corrective action plans or supplier replacement, ensuring no continuation of high-risk relationships. Our internal compliance team plans to oversee this, with 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 aim to voluntarily engage independent auditors for high-risk suppliers to verify due diligence practices, aligning with RMI's Responsible Minerals Assurance Process (RMAP) standards.

5. Report on Supply Chain Due Diligence: This statement serves as our planned annual report, intending to provide transparent disclosure of our processes and findings. We plan to 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 planned 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 2026, NSN Global Services' supply chain analysis plans to reveal no direct sourcing of 3TG from Covered Countries. For indirect exposures through third-party hardware (e.g., electronics in data center equipment), suppliers intend to provide CMRTs indicating use of conformant smelters audited by RMAP or equivalent programs like the London Bullion Market Association (LBMA) for gold. We aim to ensure that all identified smelters are listed as active or conformant on recognized industry lists, with no indications of funding conflict.

Key planned 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 intend to maintain ongoing monitoring to uphold 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 plan to pursue 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 intentions to provide accurate and timely information.

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

Conclusion

Throughout 2026, NSN Global Services plans to uphold responsible practices regarding conflict minerals, intending to comply with all applicable laws and standards despite our primarily digital edutech operations. This statement confirms our planned 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.

NSN Global Services LLC

Dover, Delaware, United States of America

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