

NSN Global Services LLC
Annual Modern Slavery Statement 2025
Version 1.0

Introduction

NSN Global Services, a limited liability company registered in Dover, Delaware, United States, operates as a global provider of technological solutions focused on enhancing education through 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 deliver primarily digital services to educational institutions, governments, businesses, and individuals to improve learning accessibility and efficiency.

This Annual Modern Slavery Statement for 2025 addresses our efforts to prevent modern slavery and human trafficking during the reporting period. Modern slavery encompasses forced labor, debt bondage, human trafficking, and other forms of exploitation. As a company with global operations, we guarantee compliance with applicable anti-slavery laws across jurisdictions, including the UK Modern Slavery Act 2015, Australian Modern Slavery Act 2018, U.S. Trafficking Victims Protection Act (TVPA), EU directives on human trafficking, and equivalent legislation in India (e.g., Bonded Labour System (Abolition) Act 1976), Africa (e.g., South Africa's Prevention and Combating of Trafficking in Persons Act 2013), and the Middle East (e.g., UAE Federal Law No. 51/2006 on Combating Human Trafficking Crimes). This statement makes no forward-looking commitments but guarantees our adherence to these legal requirements, aligned with international standards such as the International Labour Organization (ILO) Convention No. 29 on Forced Labour and the United Nations Guiding Principles on Business and Human Rights. It is published for transparency and applies to our financial year ending December 31, 2025.

Organizational Structure and Supply Chains

NSN Global Services is structured as a private LLC with a Board of Managers overseeing operations from our U.S. headquarters, supported by regional teams in our operating countries. Our business model is predominantly digital, involving software development, cloud-based platforms, and virtual deployment services for edutech solutions. This limits our physical supply chains, but we engage third-party suppliers for services such as data hosting, software tools, and occasional hardware (e.g., servers or devices for internal use).

Our supply chains are global, with key suppliers in technology sectors from regions including the U.S., EU, India, and Asia-Pacific. We guarantee identification and monitoring of suppliers where modern slavery risks may exist, such as in labor-intensive outsourcing or data center operations. High-risk areas are assessed based on indices like the Global Slavery Index, focusing on countries with elevated vulnerabilities in our footprint.

Policies on Modern Slavery

We guarantee the implementation of policies that prohibit modern slavery in our operations and supply chains. Our Code of Business Conduct and Ethics explicitly bans forced labor, human trafficking, and exploitation, applicable to all employees, contractors, and partners. This is reinforced by a dedicated Anti-Slavery Policy that outlines zero-tolerance standards and reporting obligations.

These policies are integrated into employment contracts, supplier agreements, and internal guidelines, ensuring alignment with legal requirements. For instance, under the UK and Australian Acts, we guarantee disclosure of steps taken to address slavery risks, while in the U.S., compliance with TVPA includes prohibitions on recruitment fees that could lead to debt bondage. In India and Africa, policies reflect local anti-bonded labor and anti-trafficking laws, with guarantees of fair recruitment practices.

Due Diligence and Risk Assessment

NSN Global Services guarantees risk-based due diligence processes to identify and mitigate modern slavery risks. This includes:

- Supplier Screening: Initial and ongoing assessments of third parties using questionnaires to evaluate their anti-slavery measures, labor practices, and compliance history. High-risk suppliers (e.g., those in regions with weak labor protections) undergo enhanced checks, including site visits or third-party audits where feasible.
- Risk Mapping: Annual evaluations of our operations and supply chains using tools like the U.S. Department of Labor's List of Goods Produced by Child Labor or Forced Labor, focusing on digital supply chain elements such as outsourced development in India or data services in the Middle East.
- Contractual Safeguards: Supplier contracts include clauses requiring compliance with anti-slavery laws, rights to audit, and immediate termination for violations. We guarantee no engagement with suppliers linked to exploitation.

In 2025, our due diligence covered all active suppliers, with no identified instances of modern slavery. Risks were low due to our digital focus, but we guarantee continued vigilance in higher-risk jurisdictions like parts of Africa and the Middle East.

Training and Capacity Building

We guarantee anti-slavery training for employees and relevant stakeholders to raise awareness and ensure effective implementation. Training programs cover recognition of modern slavery indicators, such as coerced labor or trafficking signs, and are mandatory for roles in procurement, HR, and compliance.

Delivered via online modules and workshops, training complies with legal expectations—e.g., under the Australian Act's emphasis on employee education. In 2025, over 95% of our global workforce completed training, with tailored content for regional teams addressing local risks, such as bonded labor in India or trafficking in the UAE. Suppliers are required to provide evidence of their own training programs as part of our due diligence.

Monitoring, Auditing, and Remediation

Monitoring is guaranteed through internal audits and supplier self-assessments, with independent third-party verifications for high-risk partners. Audits assess compliance with anti-slavery standards, including worker interviews where applicable.

Grievance mechanisms, including a confidential hotline, allow reporting of suspected modern slavery, with guarantees of investigations and non-retaliation in line with laws like the EU Whistleblower Directive and U.S. TVPA protections. Any identified issues trigger remediation processes, such as supporting affected individuals or severing ties with non-compliant suppliers. In 2025, no reports of modern slavery were received, but our systems ensured readiness for response.

Effectiveness and Key Performance Indicators

To measure effectiveness, we track indicators such as supplier compliance rates, training completion, audit findings, and grievance resolutions. In 2025, we achieved 100% supplier response to anti-slavery questionnaires and zero confirmed violations. These metrics guarantee ongoing legal compliance and inform policy refinements.

Approval and Conclusion

This statement has been approved by the Board of Managers of NSN Global Services LLC. In 2025, we maintained robust measures against modern slavery, guaranteeing compliance with all relevant laws across our global digital edutech operations. We remain vigilant in protecting human rights and preventing exploitation. This statement is available on our website. For inquiries related to modern slavery, please contact us via the channels listed on www.nsnglobalservices.com.

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