



**NSN GLOBAL SERVICES LLC
A LIMITED LIABILITY COMPANY REGISTERED IN:**

**DOVER, DELAWARE
UNITED STATES OF AMERICA**

**Audit and Transparency Policy
Version 2.0 2026**

Preamble and Commitment Statement

NSN Global Services LLC, as a pioneering global innovation company committed to transforming education and technology solutions on an international scale, recognizes the essential role of rigorous auditing and unwavering transparency in building trust, ensuring accountability, and driving sustainable success. Our mission focuses on reforming stagnant education systems, redirecting investments toward more effective and efficient outcomes in both private and public sectors, and expanding access to quality education in developing nations. In furtherance of these objectives, this Official Audit and Transparency Policy establishes a comprehensive framework for conducting internal and external audits, promoting open disclosures, and fostering a culture of integrity across all operations. This policy is crafted to enhance stakeholder confidence, mitigate risks, and support informed decision-making, while aligning with our broader governance structure. It operates entirely within the confines of our Operating Agreement, which remains the paramount document governing the company's management and obligations. Under no circumstances does this policy supersede, amend, or take precedence over the Operating Agreement; rather, it provides operational guidance to strengthen audit practices and transparency measures, ensuring full compliance with applicable laws and regulations in all jurisdictions where we conduct business, including the United States, the United Kingdom, Europe, Australia, and emerging markets.

Our dedication to audit and transparency stems from the understanding that, in a global landscape where our activities involve complex partnerships with educational institutions, governments, and technology providers, clear and verifiable processes are crucial for maintaining ethical standards and operational resilience. This policy embodies principles of openness, accuracy, and impartiality, drawing from established frameworks such as the Committee of Sponsoring Organizations of the Treadway Commission (COSO) for internal controls, the International Standards on Auditing (ISA), and transparency guidelines from the Global Reporting Initiative (GRI). By implementing these measures, NSN Global Services LLC aims to not only meet legal requirements but also exceed them, creating value through proactive disclosures and robust oversight. This document serves as a foundational tool, subject to regular review and adaptation to reflect changes in regulatory environments, technological advancements, and stakeholder expectations, always in subordination to the Operating Agreement and with the goal of reinforcing our commitment to ethical excellence in advancing global education.

Definitions and Key Principles

To ensure precise application and understanding, NSN Global Services LLC defines key terms as follows: "Audit" refers to the systematic examination and verification of financial records, operational processes, compliance measures, and performance metrics by qualified internal or external professionals. "Transparency" encompasses the timely, accurate, and accessible disclosure of relevant information to stakeholders, free from material omissions or misrepresentations. "Internal Audit" is an independent, objective assurance and consulting activity designed to add value and improve operations. "External Audit" involves independent third-party review of financial statements and controls to provide assurance to external stakeholders. "Disclosure" means the release of information through reports, filings, or communications that are clear, complete, and compliant with standards. "Stakeholders" include members, employees, clients, suppliers, regulators, investors, and communities

impacted by our activities. "Material Information" is data that could influence decisions by reasonable stakeholders.

The core principles guiding this policy are rooted in internationally recognized standards, including the Institute of Internal Auditors' International Professional Practices Framework (IPPF) and the U.S. Generally Accepted Auditing Standards (GAAS). These principles include independence, ensuring auditors are free from bias; objectivity, basing findings on evidence; confidentiality, protecting sensitive information; competence, requiring auditors to possess necessary skills; and accountability, holding all parties responsible for accurate reporting. We emphasize proactive transparency, such as voluntary disclosures beyond legal minima, to build trust in our education and technology initiatives. Legal compliance is paramount, aligning with regulations like the Sarbanes-Oxley Act (SOX) sections applicable to private entities, the EU's Non-Financial Reporting Directive, and anti-money laundering laws in various jurisdictions. By adhering to these principles, NSN Global Services LLC fosters a transparent environment that supports our mission, mitigates fraud risks, and ensures reliable information flow, all while remaining subordinate to the Operating Agreement.

Scope and Applicability

This Audit and Transparency Policy applies comprehensively to all facets of NSN Global Services LLC's operations, including our Delaware-based headquarters, global subsidiaries, joint ventures, and any controlled entities across the United States, the United Kingdom, Europe, Australia, and developing regions in Africa, Asia, and Latin America. It covers financial audits, operational reviews, compliance assessments, and transparency practices in areas such as reporting, data management, and stakeholder communications. The policy binds all members, managers, officers, employees, contractors, and third-party auditors engaged by the company, extending to supply chain partners where audits involve shared processes. In international settings, it incorporates local requirements, such as statutory audits under Australian Corporations Act or transparency obligations in the U.K. under the Companies Act, while maintaining uniformity.

Where local laws mandate stricter audit or disclosure standards, NSN Global Services LLC will adopt those, ensuring harmony with this policy and the Operating Agreement. This document does not impose new legal duties beyond those in the Operating Agreement or statutes; it serves as a practical guide for implementation. All relevant parties must familiarize themselves with the policy, with non-compliance potentially leading to remedial actions consistent with the Operating Agreement and labor laws. This broad scope promotes consistent audit and transparency practices, enhancing our global education projects' credibility and efficiency.

Audit Framework and Processes

NSN Global Services LLC establishes a structured audit framework encompassing internal and external audits to verify the accuracy of financial statements, effectiveness of internal controls, and adherence to policies. Internal audits, conducted by an independent internal audit function or outsourced professionals, follow a risk-based approach, prioritizing high-risk areas like technology investments and international fund allocations. Annual audit plans are developed, approved by the Audit Committee (if established), and include testing of controls over financial reporting, operational efficiency in educational programs, and

compliance with sustainability commitments. Findings are documented in detailed reports, with management responses and corrective action plans tracked for resolution.

External audits are performed annually by qualified independent auditors, selected through a competitive process ensuring independence per GAAS and ISA standards. These audits culminate in an opinion on financial statements' fairness, with additional reviews of internal controls under SOX-like principles. Special audits may be initiated for mergers, regulatory inquiries, or suspected irregularities, complying with laws like the Foreign Corrupt Practices Act. This framework ensures thorough oversight, supporting transparent operations in our global technology and education endeavors.

Transparency and Disclosure Practices

Transparency at NSN Global Services LLC is achieved through proactive, accurate disclosures tailored to stakeholder needs. Financial transparency includes publishing audited annual reports, detailing revenues, expenses, and investments in education reforms, accessible via our website and filings where required. Non-financial disclosures cover ESG metrics, aligned with GRI standards, such as impacts on developing nations' education access. We commit to timely reporting of material events, like significant contracts or risks, in compliance with securities laws if applicable, and voluntary updates on project outcomes.

Stakeholder engagement enhances transparency, with mechanisms like annual meetings, feedback portals, and transparent procurement processes. Data transparency in technology solutions ensures clear privacy notices and audit trails for educational data handling, adhering to GDPR and CCPA. This policy prohibits misleading disclosures, with training to reinforce accurate communication, building trust and enabling informed decisions.

Internal Controls and Risk Management Integration

Audit and transparency are integrated with internal controls and risk management to safeguard assets and ensure reliable reporting. Controls include segregation of duties, authorization protocols, and IT security measures for our technology platforms, evaluated regularly per COSO framework. Risk assessments identify audit priorities, such as fraud risks in international operations, with mitigation strategies audited for effectiveness.

Integration ensures audits inform risk updates, and transparency reports disclose control strengths and weaknesses. Compliance with laws like the Bank Secrecy Act for financial transactions is verified through controls testing. This holistic approach strengthens resilience, supporting our mission in global education.

Independence and Ethical Standards for Auditors

Maintaining auditor independence is critical, requiring external auditors to rotate lead partners every five years and prohibit non-audit services that impair objectivity, per ethical standards from the American Institute of Certified Public Accountants (AICPA). Internal auditors adhere to IPPF codes, disclosing impairments promptly. Ethical standards mandate confidentiality, competence through ongoing education, and avoidance of conflicts, with annual affirmations.

Training and oversight by the Audit Committee ensure adherence, complying with international ethics codes. This commitment upholds audit quality, fostering credible transparency.

Implementation and Responsibilities

Implementation of this policy is overseen by the Chief Financial Officer (CFO) or designated compliance officer, with the Audit Committee providing strategic guidance. Responsibilities include developing audit charters, selecting auditors, and allocating resources for tools like audit software. Managers ensure departmental cooperation, while employees report concerns via whistleblower channels. Training programs educate on policy requirements, with global adaptations for subsidiaries.

All parties are accountable, with the board reviewing implementation annually. This structured rollout ensures effective execution, legal compliance, and alignment with our Operating Agreement.

Monitoring, Review, and Continuous Improvement

Monitoring involves tracking audit completion, resolution of findings, and transparency metrics like disclosure timeliness, using KPIs and dashboards. Internal reviews assess policy effectiveness, with external validations as needed. Annual reports to the board detail outcomes, identifying trends such as improved control efficacy.

The policy is reviewed yearly or post-significant changes, incorporating feedback from stakeholders and updates from standards like ISA revisions. Continuous improvement plans address gaps, enhancing practices through benchmarking and innovation. This process ensures adaptability, sustained compliance, and strengthened audit and transparency, supporting our global education mission while subordinate to the Operating Agreement.