



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

**DOVER, DELAWARE
UNITED STATES OF AMERICA**

**Global Education Innovation Policy
Version 2.0 2026**

Preamble and Commitment Statement

NSN Global Services LLC, as a leading global innovation company dedicated to revolutionizing education and technology solutions across international borders, profoundly recognizes the transformative power of education innovation in addressing global challenges and fostering equitable opportunities. Our mission is centered on reforming outdated education systems, redirecting investments toward more effective and efficient outcomes in both private and public sectors, and expanding access to quality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 alignment with these core objectives, this Official Global Education Innovation Policy articulates a comprehensive framework for driving, supporting, and implementing innovative educational practices, technologies, and initiatives that enhance learning outcomes, accessibility, and inclusivity worldwide. This policy is designed to guide our research, development, partnerships, and deployments in a manner that prioritizes ethical innovation, stakeholder collaboration, and measurable impact, while mitigating risks associated with rapid technological advancements. It operates strictly within the parameters defined by our Operating Agreement, which serves as the ultimate authority governing the company's structure and management. Under no circumstances does this policy supersede, alter, or take precedence over the Operating Agreement; instead, it offers supplementary guidance to promote responsible innovation, ensure compliance with applicable laws and regulations, and reflect best practices in education technology for companies operating in jurisdictions including the United States, the United Kingdom, Europe, Australia, and emerging markets across the globe.

Our commitment to global education innovation is grounded in the belief that technology and creative methodologies can bridge educational divides, empower underserved populations, and prepare future generations for a rapidly evolving world. As an organization with operations spanning diverse cultural, economic, and regulatory environments, we acknowledge the need to balance innovation with ethical considerations, such as data privacy, equity, and cultural relevance, to avoid exacerbating inequalities. This policy draws inspiration from internationally recognized frameworks, including the United Nations Sustainable Development Goal 4 (Quality Education), the OECD's Education 2030 Framework, and the International Society for Technology in Education (ISTE) standards. By embedding these principles, NSN Global Services LLC aims to lead in ed-tech advancements, foster collaborative ecosystems, and contribute to global educational progress. This document is intended as a living resource, subject to periodic review and revision to incorporate emerging technologies, pedagogical insights, and stakeholder feedback, always in full subordination to the Operating Agreement and with the objective of creating lasting, positive change through innovative education solutions.

Definitions and Key Principles

To ensure clarity and consistent application, NSN Global Services LLC defines key terms as follows: "Education Innovation" refers to the development and implementation of novel technologies, methodologies, curricula, or systems that improve teaching, learning, and educational administration, including digital tools, AI-driven platforms, and blended learning models. "Ed-Tech" encompasses educational technologies, such as software, hardware, and online platforms designed to enhance educational experiences. "Inclusivity" means ensuring innovations are accessible to all learners, regardless of socioeconomic status, disability, gender, or location. "Impact Measurement" involves assessing the effectiveness of innovations through metrics like learning outcomes, user engagement, and equity indicators.

"Ethical Innovation" denotes practices that prioritize privacy, fairness, and societal benefit, avoiding harm or bias. "Stakeholders" include educators, students, parents, governments, NGOs, investors, and communities engaged in or affected by our educational initiatives. "Pilot Programs" are small-scale tests of innovations to evaluate feasibility and refine approaches before broader deployment.

The guiding principles of this policy are derived from established educational and innovation standards, such as the World Economic Forum's Education 4.0 framework and UNESCO's guidelines on AI in education. These include learner-centered design, focusing on user needs and outcomes; collaboration, partnering with diverse stakeholders for co-creation; sustainability, ensuring long-term viability and scalability; ethical responsibility, integrating human rights and data protection; evidence-based approaches, relying on research and data for validation; and adaptability, iterating based on feedback and technological advancements. Legal compliance is paramount, aligning with regulations like the U.S. Family Educational Rights and Privacy Act (FERPA), the EU's General Data Protection Regulation (GDPR) for ed-tech, and international standards on child online protection. By upholding these principles, NSN Global Services LLC ensures innovations align with our Sustainability Impact Policy, promote global equity, and remain compliant and subordinate to the Operating Agreement.

Scope and Applicability

This Global Education Innovation Policy applies universally to all aspects of NSN Global Services LLC's operations, encompassing our Delaware headquarters, global subsidiaries, joint ventures, and partnerships in the United States, the United Kingdom, Europe, Australia, and developing nations in Africa, Asia, and Latin America. It covers innovation activities in research and development, product design, pilot implementations, scaling of educational technologies, curriculum enhancements, and capacity-building programs. The policy binds all members, managers, officers, employees, contractors, consultants, and collaborators, extending to supply chain partners involved in ed-tech production or deployment. In regions with specific educational challenges, such as digital divides in rural areas, tailored applications will prioritize local needs while maintaining core standards.

Where local laws impose additional requirements—such as accessibility standards under the U.S. Americans with Disabilities Act (ADA) or innovation funding regulations in the EU—NSN Global Services LLC will adhere to those, ensuring synergy with this policy and the Operating Agreement. This document complements policies like our Global ESG Framework and Risk Management Policy, without creating new obligations beyond the Operating Agreement. All relevant parties must acknowledge the policy through training, with non-compliance addressed via corrective actions consistent with the Operating Agreement and labor laws. This extensive scope fosters innovative practices that enhance our global educational mission, while honoring the Operating Agreement's primacy.

Innovation Framework and Processes

NSN Global Services LLC's innovation framework is structured to support systematic development, from ideation to deployment, incorporating stages like needs assessment, prototyping, testing, and evaluation. Processes begin with market research and stakeholder consultations to identify gaps, such as in remote learning for developing nations, followed by collaborative design using agile methodologies. Pilot programs test innovations in real-world

settings, with iterative refinements based on data. Scaling involves partnerships for broader adoption, ensuring infrastructure compatibility and training support.

This framework complies with standards like ISTE's ed-tech guidelines, integrating risk assessments per our Risk Management Policy, to deliver ethical, effective solutions.

Ethical Considerations in Innovation

Ethical innovation is central, requiring assessments for bias in AI tools, privacy protections in data usage, and inclusivity in design to avoid digital exclusion. Guidelines prohibit harmful applications, such as surveillance-heavy tech, and mandate compliance with child protection laws like COPPA. Reviews by an ethics committee evaluate potential impacts, with transparency in algorithms and data handling.

These considerations align with UNESCO AI ethics, ensuring our innovations respect human rights and promote equity in global education.

Collaboration and Partnerships

Collaboration drives innovation, with strategies for partnering with universities, governments, and NGOs to co-develop solutions, such as open-source platforms for low-resource settings. Partnership criteria include shared values, expertise complementarity, and impact potential, with agreements outlining IP rights and ethical standards. Knowledge-sharing forums and joint pilots enhance collective progress.

This approach complies with antitrust laws like the U.S. Sherman Act, fostering ecosystems that amplify educational reforms.

Impact Measurement and Reporting

Impact is measured through KPIs like student engagement rates, learning gains, and accessibility metrics, using tools like randomized trials and analytics. Reporting includes annual innovation reports detailing progress, challenges, and outcomes, aligned with GRI standards for transparency.

This ensures accountability, compliant with funding disclosure requirements, guiding continuous enhancement.

Resource Allocation and Funding

Resources are allocated strategically, with budgets for R&D, pilots, and training, prioritizing high-impact areas like AI for personalized learning. Funding sources include internal investments, grants, and partnerships, with ethical sourcing to avoid conflicts.

This supports sustainable innovation, compliant with financial regulations.

Implementation and Responsibilities

Implementation is led by an Innovation Committee, with the CTO overseeing execution. Responsibilities include: R&D teams developing solutions, project managers handling pilots,

and compliance ensuring ethics. Resources fund tools and training on innovation best practices. Global adaptations tailor to subsidiaries.

All are accountable, with metrics in performance reviews. This ensures effective rollout, legal compliance, and alignment with the Operating Agreement, advancing ed-tech.

Monitoring, Review, and Continuous Improvement

Monitoring tracks innovation metrics, pilots, and feedback via dashboards. Annual reviews assess policy efficacy, incorporating stakeholder input and tech trends like VR in education. Continuous improvement includes updates, benchmarking against OECD standards, and agile adaptations.

The policy is revised yearly, with Board approval per the Operating Agreement. This framework ensures adaptability, sustained compliance with evolving laws like EU AI Act, and progressive innovation, strengthening our global education mission, always subordinate to the Operating Agreement.