



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

**DOVER, DELAWARE
UNITED STATES OF AMERICA**

**Global Human Rights Policy
Version 2.0 2026**

Preamble and Commitment Statement

NSN Global Services LLC, as a leading global innovation company committed to revolutionizing education and technology solutions across diverse international landscapes, profoundly recognizes the inherent dignity and equal rights of all individuals as foundational to our operations and societal impact. Our mission is centered on reforming entrenched 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 goals, this Official Global Human Rights Policy articulates our unwavering dedication to respecting, protecting, and promoting human rights throughout our business activities, supply chains, and community engagements. This policy is designed to integrate human rights considerations into every aspect of our decision-making, risk management, and stakeholder interactions, fostering an environment where human dignity is upheld and violations are prevented. It operates strictly within the boundaries set by our Operating Agreement, which remains the ultimate governing authority for the company. Under no circumstances does this policy supersede, amend, or take precedence over the Operating Agreement; rather, it serves as a supplementary framework to guide our actions, ensure compliance with international human rights standards and applicable laws, and demonstrate our ethical leadership in the education and technology sectors across jurisdictions including the United States, the United Kingdom, Europe, Australia, and emerging markets worldwide.

Our commitment to human rights is rooted in the understanding that our global operations, which span continents and involve collaborations with governments, educational institutions, suppliers, and communities, carry the responsibility to avoid complicity in abuses and to contribute positively to human well-being. We acknowledge the potential human rights impacts associated with technology deployment, data handling, labor practices, and community development in education initiatives, particularly in vulnerable regions. This policy draws from internationally recognized instruments such as the Universal Declaration of Human Rights (UDHR), the International Labour Organization (ILO) Core Conventions, the United Nations Guiding Principles on Business and Human Rights (UNGP), and the OECD Guidelines for Multinational Enterprises. By embedding these principles, NSN Global Services LLC aims to mitigate risks, enhance our reputation, and create shared value for all stakeholders, including employees, partners, clients, and the broader society. This document is a dynamic commitment, subject to ongoing review and refinement to address evolving global challenges, legal landscapes, and best practices, always in full subordination to the Operating Agreement and with the intent of advancing equitable educational access through responsible business conduct.

Definitions and Key Principles

To facilitate clear and consistent implementation, NSN Global Services LLC defines key terms as follows: "Human Rights" encompass the fundamental rights and freedoms to which all individuals are entitled, including civil, political, economic, social, and cultural rights as outlined in international standards. "Due Diligence" refers to the ongoing process of identifying, preventing, mitigating, and accounting for human rights impacts in our operations and value chain. "Stakeholders" include any individuals or groups affected by our activities, such as employees, contractors, suppliers, communities, clients, and end-users of our educational technologies. "Adverse Impact" means any negative effect on human rights caused or contributed to by our business, directly or indirectly. "Remediation" involves

actions to address and rectify human rights harms, including apologies, compensation, or systemic changes. "Vulnerable Groups" comprise populations at higher risk of rights violations, such as children, women, indigenous peoples, migrants, and persons with disabilities.

The foundational principles of this policy are aligned with the UNGP's "Protect, Respect, and Remedy" framework, emphasizing our corporate responsibility to respect human rights by avoiding infringement and addressing impacts. Key principles include universality, applying rights equally to all; non-discrimination, ensuring fair treatment without bias; accountability, holding ourselves and partners to high standards; transparency, openly reporting on our efforts; and integration, embedding human rights into core business functions like technology development and education program design. We prioritize rights such as freedom from forced labor, child labor prohibition, fair wages, safe working conditions, privacy protection, and non-discrimination, in compliance with laws like the U.S. Trafficking Victims Protection Act, the U.K. Modern Slavery Act, and EU human rights directives. By adhering to these principles, NSN Global Services LLC not only fulfills legal obligations but also enhances our contributions to sustainable development goals, particularly SDG 4 (Quality Education) and SDG 8 (Decent Work), while remaining subordinate to the Operating Agreement.

Scope and Applicability

This Global Human Rights Policy applies universally to all operations of NSN Global Services LLC, encompassing our headquarters in Delaware, United States, subsidiaries in the United Kingdom, Europe, Australia, and projects in developing nations across Africa, Asia, and Latin America. It extends to all business activities, including research and development, supply chain management, client engagements, technology deployment, and community outreach in education reform. The policy binds all members, managers, officers, employees, contractors, consultants, suppliers, and business partners acting on our behalf, requiring them to uphold human rights standards in their interactions. In regions with heightened risks, such as areas affected by conflict or weak governance, enhanced due diligence measures will be applied to mitigate potential impacts on local communities and workers.

Where local laws provide stronger protections than international standards, NSN Global Services LLC will comply with the more stringent requirements, while in areas with gaps, we will apply best practices voluntarily. This policy complements other internal documents like our Code of Business Conduct and Ethics and Sustainability Impact Policy, without creating new contractual obligations beyond the Operating Agreement. All covered parties must acknowledge and commit to this policy through training and contracts, with violations potentially resulting in corrective actions, contract termination, or other measures consistent with the Operating Agreement and applicable labor laws. This comprehensive scope ensures that our global pursuit of educational innovation respects human rights, fostering trust and sustainability in diverse cultural contexts.

Human Rights Commitments

NSN Global Services LLC commits to respecting a broad spectrum of human rights, beginning with labor rights by prohibiting forced labor, child labor, and human trafficking in our operations and supply chain, in line with ILO Conventions 29, 105, 138, and 182. We ensure fair wages, reasonable working hours, and safe environments, complying with occupational health standards like those from the Occupational Safety and Health

Administration (OSHA) and equivalent international bodies. Freedom of association and collective bargaining are supported, allowing workers to organize without retaliation. In our technology solutions for education, we protect privacy and data rights, adhering to regulations such as the General Data Protection Regulation (GDPR) and the Children's Online Privacy Protection Act (COPPA), ensuring that digital tools do not exacerbate inequalities or enable surveillance abuses.

Beyond labor, we uphold civil and political rights by promoting non-discrimination, diversity, and inclusion, with zero tolerance for harassment or bias based on race, gender, religion, disability, or other protected characteristics, aligned with the U.S. Civil Rights Act and global equivalents. Community rights are respected through consultations in project-affected areas, avoiding displacement or environmental harm that impacts livelihoods. We commit to accessibility in education technologies, ensuring inclusivity for persons with disabilities per the UN Convention on the Rights of Persons with Disabilities. These commitments are proactive, extending to remediation where impacts occur, and are integrated into risk assessments for new ventures, ensuring our global education reforms advance human rights.

Due Diligence Processes

Human rights due diligence at NSN Global Services LLC is an ongoing, risk-based process to identify and address potential adverse impacts. This begins with mapping our value chain, assessing risks in supply chains for technology components and educational materials, particularly in high-risk countries identified via tools like the Global Slavery Index. Stakeholder consultations, including with workers, communities, and experts, inform impact assessments, covering issues like data privacy in ed-tech platforms or labor conditions in partner facilities. Mitigation plans are developed, such as supplier audits, training programs, or technology safeguards, with timelines and responsible parties assigned.

Monitoring involves regular audits, third-party verifications, and grievance mechanisms for reporting concerns anonymously. Reporting on due diligence is transparent, included in annual sustainability reports aligned with UNGP reporting frameworks. This process ensures compliance with laws like the EU Corporate Sustainability Due Diligence Directive, adapting to our international operations and supporting ethical innovation in education.

Grievance Mechanisms and Remediation

NSN Global Services LLC provides accessible grievance mechanisms for stakeholders to report human rights concerns, including an anonymous hotline, online portals, and local channels in project sites, compliant with UNGP effectiveness criteria. Reports are investigated promptly by a dedicated team, with protections against retaliation and independent oversight where needed. Remediation follows, tailored to the harm—financial compensation for labor violations, policy changes for systemic issues, or partnerships with NGOs for community impacts.

We collaborate with external experts for complex cases, ensuring remedies align with victim preferences. Tracking remediation outcomes informs continuous improvement, with disclosures in reports. This approach fosters accountability, complying with laws like the U.S. Whistleblower Protection Act, and builds trust in our global education initiatives.

Training and Capacity Building

Training is integral to embedding human rights awareness, with mandatory programs for all employees and managers covering topics like identifying risks, ethical decision-making, and cultural sensitivity in international projects. Tailored sessions for procurement teams focus on supplier due diligence, while technology developers learn about privacy-by-design. Partners and suppliers receive guidance through contracts and workshops, promoting shared standards.

Capacity building extends to communities, offering human rights education in our programs. Resources include e-learning modules and external certifications, with effectiveness measured via assessments. This investment ensures compliance and empowers our workforce to advance rights-respecting education technologies.

Implementation and Responsibilities

Implementation is overseen by a Human Rights Steering Committee, comprising senior leaders from legal, operations, and sustainability functions, reporting to the Board. Responsibilities are assigned: managers integrate rights into departmental plans, the compliance officer handles grievances, and procurement leads supplier assessments. Resources are allocated for tools, training, and audits, with global coordination for subsidiaries.

All staff are responsible for adherence, with performance linked to human rights metrics. Partnerships with organizations like the UN Global Compact enhance implementation. This structure ensures effective rollout, legal compliance across jurisdictions, and alignment with our Operating Agreement, driving responsible global operations.

Monitoring, Review, and Continuous Improvement

Monitoring employs key indicators like audit findings, grievance resolutions, and stakeholder feedback, tracked via dashboards and annual assessments. Independent reviews, including by external auditors, verify effectiveness, with results reported to the Board and publicly where appropriate. The policy is reviewed annually or following incidents, incorporating lessons from global events or regulatory changes, such as updates to ILO standards.

Continuous improvement involves action plans, benchmarking against peers, and innovation in due diligence tools. Stakeholder engagement refines approaches, ensuring adaptability. This framework sustains compliance with evolving laws like the U.S. Uyghur Forced Labor Prevention Act, enhances our human rights performance, and supports our mission to foster equitable education worldwide, always subordinate to the Operating Agreement.