



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

**DOVER, DELAWARE  
UNITED STATES OF AMERICA**

**Risk Management and Oversight Policy  
Version 2.0 2026**

## **Preamble and Commitment Statement**

NSN Global Services LLC, as a trailblazing global innovation company committed to overhauling education and technology solutions across multifaceted international environments, profoundly understands the imperative of a robust risk management and oversight framework to safeguard our assets, reputation, and long-term objectives. Our mission revolves around reforming rigid education systems, reallocating investments to yield superior effectiveness and efficiency in both private and public sectors, and extending access to quality education in developing nations. In consonance with these endeavors, this Official Risk Management and Oversight Policy establishes a detailed system for identifying, assessing, mitigating, and monitoring risks across all facets of our operations, while ensuring effective oversight by leadership and stakeholders. This policy is crafted to promote resilience, informed decision-making, and proactive risk handling, thereby minimizing potential disruptions and maximizing opportunities in the dynamic education and technology landscapes. It operates entirely within the confines delineated by our Operating Agreement, which persists as the supreme governing instrument for the company's structure and responsibilities. Under no circumstances does this policy override, modify, or assume precedence over the Operating Agreement; rather, it provides an intricate guide to operationalize risk management practices, guarantee compliance with applicable laws and regulations, and embody best practices in risk oversight for limited liability companies engaged in global activities, spanning jurisdictions such as the United States, the United Kingdom, Europe, Australia, and various emerging markets.

Our dedication to comprehensive risk management and oversight is founded on the recognition that our worldwide operations, which encompass technological advancements, educational program implementations, and partnerships in diverse geopolitical and economic settings, are inherently exposed to a spectrum of risks including financial, operational, reputational, legal, and environmental challenges. By instituting structured processes for risk identification and mitigation, NSN Global Services LLC aims to protect stakeholder interests, enhance strategic agility, and foster a culture of accountability. This policy is inspired by internationally recognized standards such as the Committee of Sponsoring Organizations of the Treadway Commission (COSO) Enterprise Risk Management (ERM) framework, ISO 31000 on risk management, and guidelines from the Institute of Risk Management (IRM). Through its application, we seek to integrate risk considerations into core business functions, align with sustainability and governance policies, and contribute to sustainable value creation. This document serves as a living blueprint, subject to regular evaluation and refinement to adapt to emerging threats, regulatory evolutions, and organizational growth, always in complete subordination to the Operating Agreement and with the purpose of fortifying our mission to drive equitable educational transformations through prudent risk stewardship.

## **Definitions and Key Principles**

To ensure precise interpretation and consistent application, NSN Global Services LLC defines essential terms as follows: "Risk" refers to the possibility of an event or condition that could have a positive or negative impact on the achievement of our objectives, encompassing uncertainties in strategic, operational, financial, compliance, and reputational domains. "Risk Management" is the coordinated activities to direct and control the organization with regard to risk, including identification, assessment, response, and monitoring. "Oversight" involves the supervisory functions performed by the Board, committees, and management to ensure

effective risk management implementation. "Enterprise Risk Management (ERM)" denotes an integrated approach to managing risks across the entire organization. "Risk Appetite" is the level and type of risk the company is willing to accept in pursuit of its goals. "Risk Tolerance" specifies the acceptable variation in performance related to achieving objectives. "Stakeholders" include members, employees, clients, suppliers, regulators, investors, and communities influenced by our activities.

The core principles underpinning this policy are drawn from established risk management frameworks like COSO ERM and ISO 31000, tailored to our education and technology focus. These include integration, embedding risk management into all business processes; proportionality, scaling efforts to risk significance; structured and comprehensive approaches, ensuring systematic coverage; informed and timely decision-making, based on reliable data; iterative processes, allowing for continuous adaptation; and stakeholder involvement, incorporating diverse perspectives. We emphasize a positive risk culture, encouraging open reporting of concerns without fear of reprisal. Legal compliance is fundamental, aligning with statutes such as the U.S. Sarbanes-Oxley Act provisions on internal controls, the EU's General Data Protection Regulation (GDPR) for data risks, and international standards like the Basel Accords for financial risks where applicable. By adhering to these principles, NSN Global Services LLC not only manages threats but also capitalizes on opportunities, supporting innovative educational solutions while remaining fully compliant and subordinate to the Operating Agreement.

### **Scope and Applicability**

This Risk Management and Oversight Policy applies broadly to all elements of NSN Global Services LLC's operations, including our U.S.-based headquarters, international subsidiaries, joint ventures, and controlled entities in regions such as the United Kingdom, Europe, Australia, Africa, Asia, and Latin America. It encompasses risks in strategic planning, technology development, educational project delivery, supply chain management, financial transactions, compliance obligations, and reputational matters. The policy obligates all members, managers, officers, employees, contractors, consultants, and business partners to participate in risk identification and mitigation, with heightened scrutiny in high-risk areas like cybersecurity in ed-tech platforms or geopolitical instabilities in developing nation projects. Adaptations are made for local contexts, incorporating region-specific risks such as natural disasters in vulnerable areas or regulatory variations in data privacy.

In cases where local regulations impose more rigorous risk management requirements—such as enhanced financial reporting under Australian Securities and Investments Commission guidelines or environmental risk assessments per EU directives—NSN Global Services LLC will adopt those standards while maintaining policy coherence. This document complements existing policies like our Corporate Governance Policy and Sustainability Impact Policy, without imposing additional legal burdens beyond the Operating Agreement. All relevant individuals must review and commit to this policy through annual acknowledgments, with non-compliance addressed via disciplinary measures aligned with the Operating Agreement and employment laws. This extensive scope ensures unified risk practices, bolstering our global resilience and ability to advance educational access through technology, while honoring the Operating Agreement's authority.

### **Risk Management Framework**

NSN Global Services LLC's risk management framework is structured around the COSO ERM model, comprising governance and culture, strategy and objective-setting, performance, review and revision, and information, communication, and reporting. Governance establishes risk oversight roles, with the Board providing strategic direction and a Risk Committee (if formed) handling detailed assessments. Strategy integrates risk appetite into planning, aligning with our mission to reform education by evaluating threats like market disruptions or technological obsolescence. Performance involves identifying risks through tools like SWOT analyses and scenario planning, assessing them via qualitative and quantitative methods (e.g., probability-impact matrices), and responding with avoidance, acceptance, mitigation, or transfer strategies, such as insurance for financial risks or diversification for supply chain vulnerabilities.

Review ensures ongoing monitoring, with key risk indicators (KRIs) tracked and internal audits verifying controls. Information flows through secure channels, with reporting to stakeholders on risk status. This framework complies with standards like ISO 31000, adapting to our international operations by incorporating cultural sensitivities and legal nuances, thereby enhancing our capacity to deliver sustainable educational innovations.

### **Risk Identification and Assessment**

Risk identification at NSN Global Services LLC employs a multi-faceted approach, involving workshops, surveys, and data analytics to uncover internal and external risks, categorized into strategic (e.g., competitive shifts in ed-tech), operational (e.g., project delays in developing nations), financial (e.g., currency fluctuations), compliance (e.g., data protection breaches), and reputational (e.g., ethical lapses in partnerships). Emerging risks, such as AI ethics or climate impacts on infrastructure, are scanned via horizon scanning and expert consultations. Assessment quantifies risks using tools like Monte Carlo simulations for probabilistic modeling or heat maps for visualization, considering likelihood, impact, velocity, and interconnectedness.

Vulnerability assessments evaluate control effectiveness, with third-party experts engaged for specialized areas like cybersecurity. This process ensures comprehensive coverage, compliant with regulations like the U.S. Cybersecurity and Infrastructure Security Agency guidelines, and informs prioritized mitigation for our global education reforms.

### **Risk Response and Mitigation**

Upon assessment, risks are addressed through tailored responses: avoidance for intolerable threats, like withdrawing from high-conflict regions; mitigation via controls, such as encryption for data risks or training for human error; transfer through insurance or hedging; and acceptance for low-impact residuals, with monitoring plans. Mitigation strategies are documented in risk registers, assigning owners, timelines, and resources, integrated into business continuity plans for disruptions like pandemics affecting educational deliveries.

Effectiveness is tested through simulations and audits, ensuring compliance with laws like the U.S. Federal Risk and Authorization Management Program for cloud risks. This proactive stance minimizes exposures, supporting resilient operations in technology and education.

### **Oversight and Governance**

Oversight is exercised by the Board, which reviews risk reports quarterly, sets risk appetite, and approves major mitigations, per the Operating Agreement. A Risk Committee, comprising independent members with expertise in finance and technology, provides in-depth scrutiny, recommending policies and overseeing audits. Management executes daily oversight, with the Chief Risk Officer (if appointed) coordinating enterprise-wide efforts. Escalation protocols ensure timely Board notification of material risks.

This governance structure aligns with COSO principles, complying with fiduciary duties under Delaware law, and fosters accountability in our international pursuits.

### **Reporting and Communication**

Transparent reporting communicates risk status through dashboards, annual reports, and ad hoc alerts, tailored to audiences—detailed for management, summarized for the Board. Communication channels include intranet portals, training sessions, and whistleblower hotlines, encouraging risk reporting. External disclosures, where required, align with GRI standards for ESG risks.

This ensures informed stakeholders, compliant with securities laws if applicable, enhancing trust in our education mission.

### **Implementation and Responsibilities**

Implementation is led by senior management, with the Risk Committee providing guidance. Responsibilities include: department heads identifying unit-specific risks, the compliance team ensuring legal alignment, and employees reporting concerns. Resources are allocated for tools like risk software, training on ISO 31000, and external consultants. Global rollout involves subsidiary adaptations, with centralized reporting.

All parties are accountable, with performance metrics incorporating risk management. This ensures effective execution, juridical compliance across borders, and harmony with the Operating Agreement, driving secure innovations in education.

### **Monitoring, Review, and Continuous Improvement**

Monitoring utilizes KRIs, audits, and stress tests to track risk dynamics, with automated alerts for thresholds. Reviews occur annually or post-events, assessing framework efficacy via KPIs like mitigation timeliness and incident reductions. Continuous improvement draws from lessons learned, benchmarking against peers, and incorporating feedback from stakeholders and regulators.

Updates are approved by the Board per the Operating Agreement, integrating advancements like AI for predictive analytics. This iterative process guarantees adaptability, sustained compliance with evolving laws such as the EU's Digital Operational Resilience Act, and progressive risk management enhancement, ultimately reinforcing our commitment to transformative, risk-aware educational advancements worldwide, always in subordination to the Operating Agreement.