



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

**DOVER, DELAWARE
UNITED STATES OF AMERICA**

**Stakeholder Engagement Policy
Version 2.0 2026**

Preamble and Commitment Statement

NSN Global Services LLC, as a visionary global innovation company committed to reshaping education and technology solutions across diverse international contexts, deeply values the role of meaningful stakeholder engagement in achieving our strategic goals and fostering sustainable relationships. Our mission focuses on reforming stagnant education systems, redirecting investments toward more impactful and efficient outcomes in both private and public sectors, and enhancing access to quality education in developing nations. In alignment with these pursuits, this Official Stakeholder Engagement Policy outlines a comprehensive approach to identifying, consulting, and collaborating with stakeholders to incorporate their perspectives into our decision-making, operations, and initiatives. This policy is designed to build trust, address concerns, leverage opportunities, and create shared value, while mitigating risks associated with misalignment or oversight in our global activities. It operates entirely within the framework set by our Operating Agreement, which remains the supreme governing document for the company. Under no circumstances does this policy supersede, amend, or take precedence over the Operating Agreement; rather, it provides detailed guidance to promote effective engagement practices, ensure compliance with applicable laws and regulations, and embody best practices in stakeholder management for organizations in the education and technology sectors across jurisdictions including the United States, the United Kingdom, Europe, Australia, and emerging markets worldwide.

Our dedication to stakeholder engagement is rooted in the recognition that our operations, which span continents and involve partnerships with governments, educational institutions, communities, suppliers, and investors, are inherently interconnected with the interests and expectations of diverse groups. Effective engagement enables us to anticipate challenges, such as cultural sensitivities in developing regions or regulatory shifts in technology deployment, and to co-create solutions that enhance educational equity. This policy draws from internationally acclaimed frameworks, including the AA1000 Stakeholder Engagement Standard, the United Nations Guiding Principles on Business and Human Rights (UNGPs), and the Global Reporting Initiative (GRI) standards on stakeholder inclusivity. By integrating these principles, NSN Global Services LLC aims to not only meet legal obligations but to exceed them, cultivating long-term partnerships that drive innovation and positive societal impact. This document serves as a foundational tool, subject to ongoing review and adaptation to reflect evolving stakeholder dynamics, legal landscapes, and best practices, always in full subordination to the Operating Agreement and with the intent of advancing our mission through collaborative and responsible business conduct.

Definitions and Key Principles

To facilitate precise and consistent implementation, NSN Global Services LLC defines key terms as follows: "Stakeholders" encompass any individuals, groups, or organizations that can affect or be affected by our activities, including employees, clients, suppliers, investors, communities, governments, NGOs, and regulatory bodies. "Engagement" refers to the systematic process of interacting with stakeholders through consultation, dialogue, collaboration, or partnership to understand and address their needs, concerns, and contributions. "Materiality" denotes the significance of issues to stakeholders and the company, guiding prioritization in engagement efforts. "Inclusivity" means ensuring diverse voices, particularly from underrepresented or vulnerable groups, are heard without discrimination. "Transparency" involves open communication about engagement processes, outcomes, and decisions. "Accountability" requires documenting engagements and

responding to feedback with measurable actions. "Grievance Mechanism" is a process for stakeholders to raise and resolve concerns related to our impacts.

The core principles guiding this policy are derived from established standards such as the International Finance Corporation (IFC) Performance Standards on stakeholder engagement and ISO 26000 on social responsibility. These include stakeholder-centered approaches, focusing on mutual benefit and respect; timeliness, engaging early and often in project lifecycles; proportionality, scaling efforts to the scale of impacts; cultural sensitivity, adapting methods to local contexts in our global operations; and continuous learning, using insights to improve practices. Legal compliance is embedded, aligning with requirements like the U.S. Securities and Exchange Commission (SEC) disclosure rules for investor relations, the EU's Corporate Sustainability Reporting Directive (CSRD) for stakeholder reporting, and human rights due diligence laws in various jurisdictions. By upholding these principles, NSN Global Services LLC ensures engagements contribute to ethical governance, support our Sustainability Impact Policy, and enhance our ability to deliver technology-enabled educational reforms, all while remaining subordinate to the Operating Agreement.

Scope and Applicability

This Stakeholder Engagement Policy applies comprehensively to all aspects of NSN Global Services LLC's operations, including our U.S. 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 engagement activities in strategic planning, project development, supply chain management, community outreach, investor relations, and policy advocacy, encompassing both internal stakeholders like employees and external ones such as local communities in educational projects. The policy binds all members, managers, officers, employees, contractors, and partners, requiring integration into functions like technology innovation and education reform initiatives. In high-impact areas, such as deployments in vulnerable communities, enhanced engagement protocols will be applied to address specific risks and opportunities.

Where local laws mandate additional engagement standards—such as community consultations under Australian environmental laws or public participation requirements in EU directives—NSN Global Services LLC will incorporate those while maintaining policy consistency. This document complements other policies like our Global Human Rights Policy and Corporate Governance Policy, without imposing new contractual duties beyond the Operating Agreement. All relevant parties must familiarize themselves with the policy through training and resources, with non-adherence addressed via corrective measures aligned with the Operating Agreement and labor laws. This broad scope ensures inclusive practices that strengthen our global educational impact, while respecting the Operating Agreement's authority.

Stakeholder Identification and Mapping

Stakeholder identification at NSN Global Services LLC involves a systematic process to catalog all relevant parties, using tools like stakeholder matrices to classify them based on influence, interest, and impact—such as high-influence regulators in technology standards or affected communities in developing nation projects. Mapping assesses their expectations, risks, and engagement needs, incorporating data from surveys, historical interactions, and external analyses. This includes prioritizing vulnerable groups, like indigenous populations or

low-income students, to ensure equitable representation. Annual updates account for changes, such as new partnerships in ed-tech.

This methodical approach complies with GRI standards for stakeholder inclusivity, enabling targeted engagements that support our mission-driven operations.

Engagement Methods and Strategies

Engagement methods are diverse and tailored, including consultations via town halls, surveys, focus groups, and digital platforms for broad reach; collaborations through joint ventures or advisory panels; and partnerships with NGOs for community programs. Strategies emphasize two-way communication, with feedback loops to incorporate input into decisions, such as adapting technology tools based on user insights from educators. For global projects, culturally appropriate methods like local language materials or in-person meetings in remote areas are used. Digital tools enhance accessibility, ensuring compliance with data protection laws like GDPR.

These strategies foster meaningful dialogue, aligned with UNGP for business impacts, enhancing innovation in education.

Grievance and Feedback Mechanisms

NSN Global Services LLC provides accessible grievance mechanisms, including anonymous hotlines, online forms, and local representatives, compliant with UNGP criteria for effectiveness. Feedback is solicited regularly through surveys and forums, with processes for timely acknowledgment, investigation, and resolution of concerns, such as disputes over project impacts. Remediation includes apologies, compensations, or policy changes, tracked for patterns to inform improvements.

These mechanisms build trust, comply with laws like the U.S. Alternative Dispute Resolution Act, and address issues in our international education initiatives.

Reporting and Transparency

Transparency is achieved through regular reporting on engagements, including annual sustainability reports detailing stakeholder interactions, outcomes, and metrics like response rates, aligned with GRI and CSRD standards. Internal reports inform leadership, while public disclosures on our website highlight key dialogues, such as community consultations in developing regions.

This reporting ensures accountability, complies with SEC rules where applicable, and demonstrates our commitment to open governance.

Integration with Other Policies

This policy integrates with frameworks like our ESG Framework and Risk Management Policy, embedding stakeholder input into ESG assessments and risk mitigations. Alignments ensure cohesive approaches, such as incorporating human rights engagements from our Global Human Rights Policy.

This integration enhances holistic decision-making, compliant with governance standards, supporting ethical operations.

Implementation and Responsibilities

Implementation is overseen by a Stakeholder Engagement Coordinator, with the Sustainability Committee providing strategic guidance. Responsibilities include: department heads conducting engagements in their areas, the compliance team monitoring adherence, and the Board reviewing high-level reports. Resources are allocated for tools, training on AA1000 standards, and global coordination. Contracts with partners mandate engagement clauses.

All staff are responsible, with performance tied to engagement metrics. This ensures effective rollout, legal compliance across jurisdictions, and alignment with the Operating Agreement, driving collaborative educational advancements.

Monitoring, Review, and Continuous Improvement

Monitoring utilizes key indicators like engagement frequency, satisfaction scores, and grievance resolutions, tracked via dashboards and audits. Annual reviews assess policy effectiveness, incorporating stakeholder feedback and external benchmarks from IFC standards. Continuous improvement involves action plans, such as refining methods based on lessons from projects or adopting new digital tools for inclusivity.

The policy is updated yearly or following significant changes, with Board approval per the Operating Agreement. This iterative process guarantees adaptability, sustained compliance with evolving regulations like CSRD amendments, and progressive enhancement of engagements, ultimately strengthening our mission to foster equitable education globally through stakeholder-centered practices, always subordinate to the Operating Agreement.