

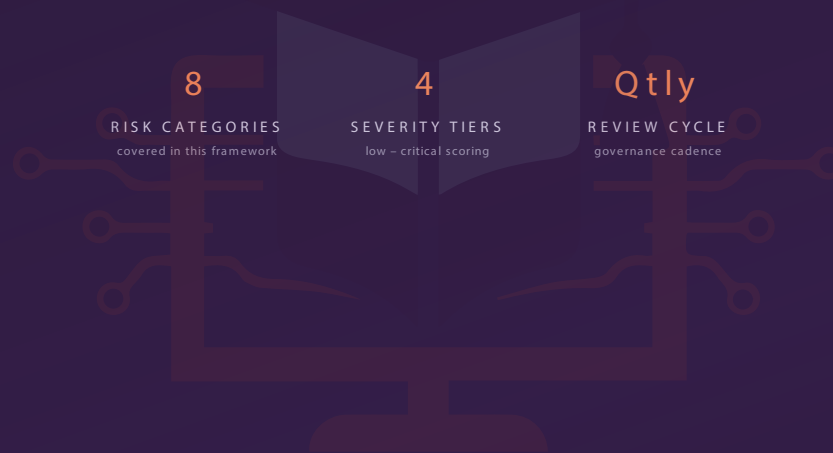


SCHOLANET TECHNOLOGIES

RISK MANAGEMENT FRAMEWORK

Enterprise & Programme Risk Register for a National Digital Education Ecosystem

Identifying. Assessing. Mitigating.
Protecting learners, partners and institutional credibility.



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RISK

01 Executive Summary

Scholanet Technologies is building a national-scale digital education ecosystem intended to connect learners, parents, teachers, schools, government, NGOs, businesses and funders. A programme of this scope — spanning identity systems, child data, school operations, payments and government integrations — carries risks that must be identified, owned and actively managed rather than discovered after the fact.

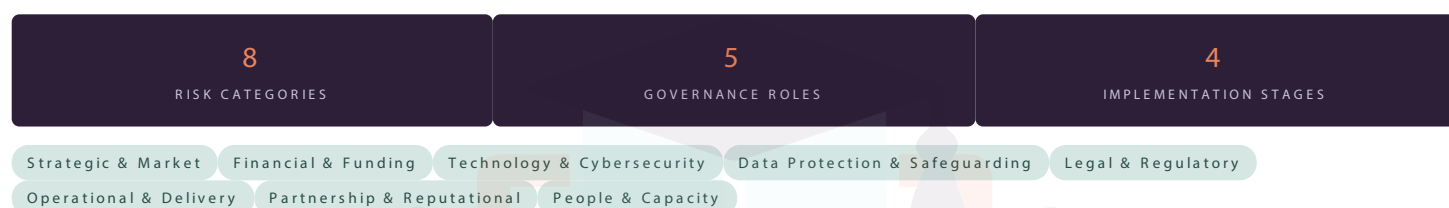
This Risk Management Framework sets out how Scholanet identifies, scores, mitigates, monitors and reports on risk across the organisation and its platform. It is intended as a living governance document for the Board, management team, partners and funders — reviewed and updated as the ecosystem moves from Foundation through Pilot, Scale and National Ecosystem stages.

This framework describes Scholanet's risk management approach, categories and proposed mitigations. Unless expressly identified as complete or verified, listed mitigations represent planned or in-progress controls, not confirmed operational status.

02 Purpose & Scope

The purpose of this framework is to give Scholanet's Board, leadership team, partners and funders a shared, structured view of the risks facing the organisation and its platform, and the controls in place or planned to manage them.

It covers Scholanet Technologies' institutional operations in Uganda, its digital platform and technical infrastructure, its stakeholder ecosystem (learners, parents, teachers, schools, government, NGOs, businesses, scholarship providers and funders), and its funding and partnership activities. It applies at every implementation stage — Foundation, Pilot, Scale and National Ecosystem.



03 Risk Management Approach

Scholanet manages risk through a continuous cycle rather than a one-time assessment. Each risk is identified, scored, assigned an owner, mitigated where practical, and monitored on an ongoing basis, with formal review at defined intervals.

1 IDENTIFY 2 ASSESS 3 ASSIGN OWNER 4 MITIGATE 5 MONITOR 6 REVIEW & REPORT

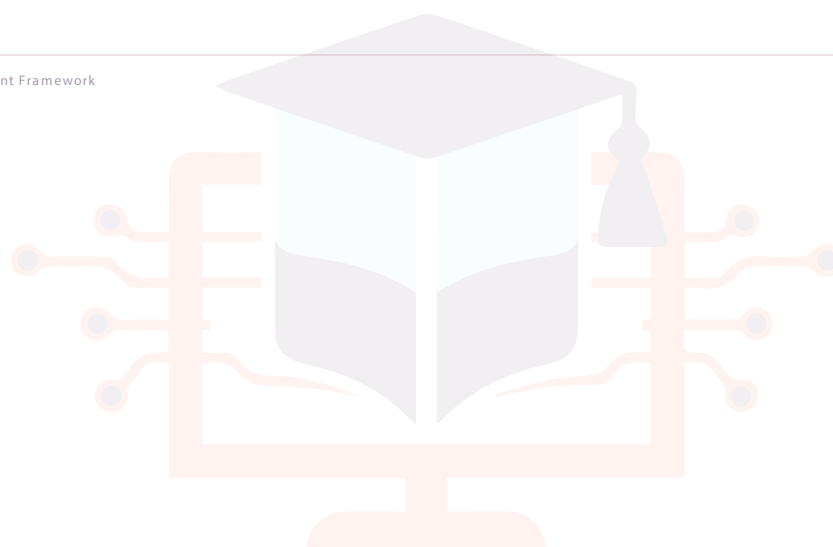
Risks are identified from multiple sources: platform architecture and security review, school and pilot deployment feedback, partner and funder due diligence, legal and regulatory monitoring, and Board and management judgement. New risks may be raised by any team member, partner or stakeholder at any time — the cycle is not limited to scheduled reviews.

04 Risk Appetite

Scholanet's risk appetite is deliberately conservative in areas involving children's data, safeguarding, and public claims about funding, scale or partnerships — and more tolerant of calculated risk in product experimentation, technology choices and market approach where failure is recoverable and does not expose learners or institutional credibility to harm.

Low tolerance: child data exposure, safeguarding failures, misrepresenting funding or partnerships as secured/formal before they are, non-compliance with the Uganda Data Protection Act.

Higher tolerance: phased/iterative technology rollout, piloting with a limited school set before national scale, testing new sustainability models before committing at scale.



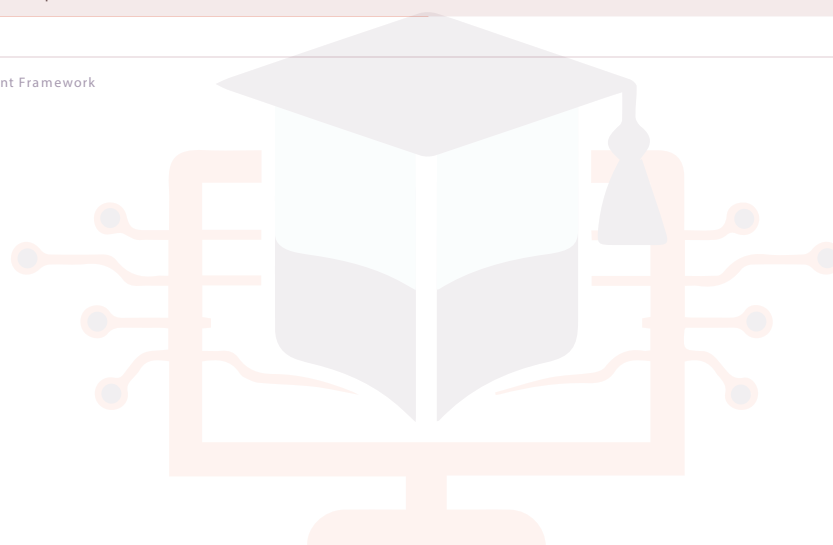
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05 Governance & Ownership

Risk ownership sits with named roles rather than being treated as a shared, unowned responsibility. Each risk category has a designated owner accountable for monitoring exposure and progressing mitigation; unresolved or escalating risks are brought to the Executive Chairman and, where material, to the Board.

ROLE	RISK ACCOUNTABILITY
Executive Chairman	Overall risk oversight; strategic, funding and reputational risk; final escalation point; represents Scholanet to partners, funders and government on risk-sensitive matters.
Legal Director	Legal, regulatory and compliance risk; data protection and safeguarding policy; contract and partnership risk review; incorporation and corporate-structure matters.
Technical Director	Technology, cybersecurity, platform architecture and data-infrastructure risk; system interoperability with government platforms (EMIS, UNEB, NIRA); technical due diligence for partners.
Risk & Governance Committee	Periodic review of the full risk register; escalation triage; ensures no category is left without an active owner; recommends changes to this framework.
School / Pilot Leads	Front-line identification of operational and delivery risk during onboarding and pilot deployment; first point of escalation from the field.

Risk ownership does not imply the named role personally resolves every risk — it means that role is accountable for ensuring the risk is tracked, mitigated, and reported until closed or formally accepted.



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06 Risk Scoring Methodology

Each risk is scored on two dimensions — Likelihood (how probable the risk is to occur) and Impact (how severe the consequence would be if it did) — each rated 1 to 5. The two scores combine into a single severity tier that determines how urgently the risk is managed and how often it is reviewed.

LIKELIHOOD	IMPACT				
	1 · Minimal	2 · Minor	3 · Moderate	4 · Major	5 · Severe
5 · Almost certain	Med	High	High	Critical	Critical
4 · Likely	Low	Med	High	High	Critical
3 · Possible	Low	Med	Med	High	High
2 · Unlikely	Low	Low	Med	Med	High
1 · Rare	Low	Low	Low	Med	Med

Low — monitor at routine review

Medium — active mitigation plan

High — owner reports monthly

Critical — immediate escalation to Chairman/Board

Severity tiers are re-assessed at every review cycle — a risk's score can move up or down as mitigations take effect or circumstances change. Scores are judgement-based, informed by whoever owns the risk and, where relevant, technical or legal review.



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07 Strategic & Market Risks

Risks relating to whether Scholanet's ecosystem model is adopted at the scale required to reach its 1.5M learner / 48,000 institution planning targets, and whether the platform stays aligned with the environment it operates in.

RISK	DESCRIPTION	SEVERITY	MITIGATION
Slow institutional adoption	Schools and institutions are slow to onboard, undermining the national-scale ecosystem model and its planning targets.	High	Phased Foundation Pilot Scale rollout; early proof points with a limited, well-supported school set before wider expansion.
Ecosystem model complexity	An eight-stakeholder-group model (learners, parents, teachers, schools, businesses, government, NGOs, funders) is harder to deliver and communicate than a single-purpose product.	Medium	Sequenced delivery — core learner/school/parent modules first; other stakeholder services phased in once foundations are proven.
Competing or overlapping platforms	Government, NGO or commercial platforms addressing similar problems reduce differentiation or duplicate effort.	Medium	Alignment with MoES Digital Agenda and existing systems (EMIS, UNEB, NIRA) positions Scholanet as complementary infrastructure rather than a competing system.
Policy or education-sector shift	Changes in national education policy, curriculum or government digital-infrastructure priorities alter the environment Scholanet is designed for.	Low	Ongoing engagement with MoES and government stakeholders; platform architecture built for configurability rather than fixed assumptions.

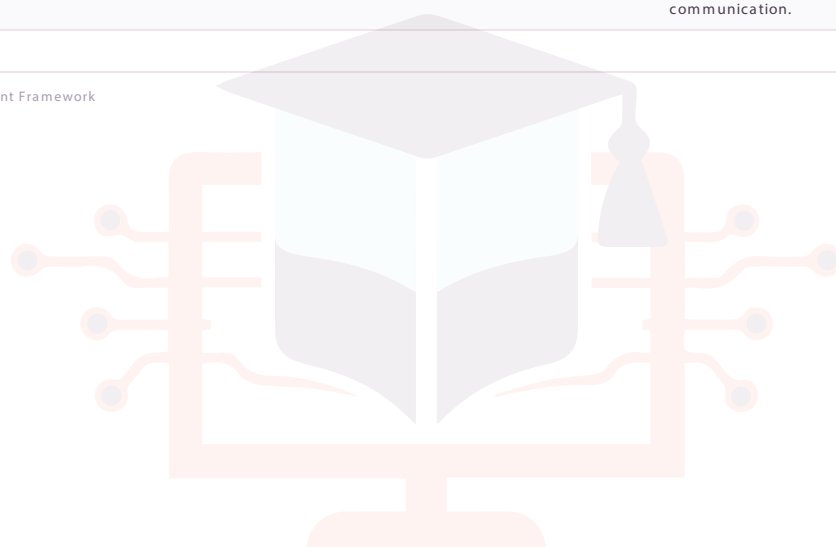


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08 Financial & Funding Risks

Scholanet's funding framework spans an initial UGX 1 billion mobilisation milestone up to a UGX 250–350 billion five-year planning envelope. Risks here concern whether resources are secured, allocated and accounted for responsibly at each stage.

RISK	DESCRIPTION	SEVERITY	MITIGATION
Initial mobilisation shortfall	The UGX 1 billion first-milestone target is not reached, delaying platform development, infrastructure and early deployment.	High	Diversified funding pathways — subscriptions, grants, partnerships, donor support — rather than reliance on a single funding source.
Funding pledged vs received gap	Pledged or committed funds are not converted into received, spendable funds on the timeline assumed in planning.	High	Funding transparency framework distinguishing Pledged / Committed / Received / Spent-Allocated at all times; no projected funding treated as available.
Cost overrun vs indicative planning figures	Actual platform engineering, infrastructure, security and onboarding costs exceed indicative planning figures.	Medium	Costing validated through technical, financial and implementation due diligence before commitments are made against it.
Currency & macroeconomic exposure	UGX volatility or inflation affects the real value of multi-year funding envelopes and partner commitments.	Medium	Planning figures reviewed periodically; where practical, funding agreements account for exchange and inflation exposure.
Premature representation of funding as secured	Indicative or target funding figures are mistaken for, or presented as, funds already received.	High	Standing rule: no projected or requested funding is ever presented as money already received, in any external communication.



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09 Technology & Cybersecurity Risks

Scholanet's platform is offline-first, spans web and future mobile access under one identity system, and is designed to integrate with national systems including EMIS, UNEB, NIRA, the NTC teacher registry and mobile money providers. This creates a wide technical surface area to secure and keep reliable.

RISK	DESCRIPTION	SEVERITY	MITIGATION
Data breach / unauthorised access	Learner, parent, teacher or institutional data is accessed without authorisation, including via a compromised third-party integration.	Critical	AES-256 encryption, role-based access control, authentication hardening, and security review before any production integration goes live.
Offline-sync data conflicts	Differential sync across offline-first school deployments produces conflicting or corrupted records.	Medium	Conflict-resolution logic tested in pilot deployments before wider rollout; audit logging on all record changes.
Third-party / government integration failure	Dependency on EMIS, UNEB, NIRA, NTC or mobile-money APIs that are unavailable, changed, or delayed on the provider side.	High	Explicit Year-1-vs-deferred scoping per integration; platform functions independently where an integration is not yet live.
Platform downtime at scale	Backend infrastructure does not hold up under national-scale concurrent usage (target: 1.5M+ learners).	High	Progressive scaling through Pilot and Scale stages rather than a single national launch; monitoring and backup systems built into core architecture.
Payment processing not yet production-ready	Live payment processing (e.g. DPO Pay) requires merchant approval and production credentials not yet in place.	Medium	Payment features are not represented as live until merchant approval and production credentials are confirmed.
Responsible-AI misuse	AI features are used in ways that replace, rather than support, human educational or safeguarding decisions.	Medium	AI use is scoped to transparency, human oversight, fairness and accountability; never a substitute for safeguarding decisions.



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10 Data Protection, Privacy & Child Safeguarding Risks

Because Scholanet operates in an education environment involving children, this category carries the organisation's lowest risk tolerance. It governs learner information, the one-parent-account model, early-years safeguarding, and any authorised monitoring or data sharing with schools, government or NGOs.

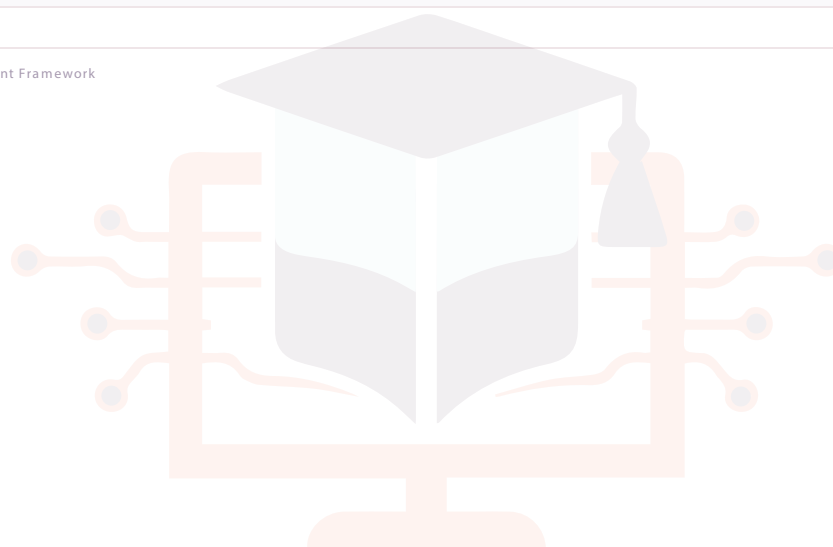
RISK	DESCRIPTION	SEVERITY	MITIGATION
Unauthorised exposure of learner data	Learner records (academic, attendance, health/emergency, disciplinary) are exposed to parties without a legitimate, authorised basis.	Critical	Role-based access, data minimisation, consent controls, and Uganda Data Protection Act-aligned governance across student/parent/institution/state data tiers.
NGO or third-party access to private learner data	Aggregated data intended for programme planning is used to identify or profile individual learners without authorisation.	High	Standing rule: private learner information is not automatically available to NGOs; government/NGO access is limited to appropriately governed, aggregated intelligence.
Early-years safeguarding gaps	Parent-monitoring or remote-engagement features are misused, or insufficiently protect younger learners.	High	Child safeguarding treated as a core design principle for early-years learners, not an add-on; safeguarding review built into feature design.
Cross-border data handling (South Sudan deployment)	Data governance requirements differ between Uganda and South Sudan deployments (e.g. SAADO EduTrack), creating compliance gaps.	Medium	Jurisdiction-specific data governance review before any cross-border deployment goes live.
Displaced / vulnerable learner data handling	Cross-school transfer of displaced students' records (PLT-ID migration) exposes sensitive circumstances inappropriately.	High	Controlled transfer workflow with authorisation checks; "unknown/unexplained" departures flagged for review rather than exposed broadly.

Any use of learner information must remain subject to applicable privacy, safeguarding, authorisation and data-governance requirements — this is a non-negotiable constraint on every feature, not a target to be balanced against delivery speed.

11 Legal, Regulatory & Compliance Risks

Scholanet Technologies holds registered IP and trademark protections and operates through a defined corporate structure. This category covers risks to that legal standing, to regulatory compliance, and to Scholanet's ability to operate as represented.

RISK	DESCRIPTION	SEVERITY	MITIGATION
Uganda Data Protection Act non-compliance	Platform data handling falls short of Uganda Data Protection Act requirements as the platform scales.	High	Data governance built around Uganda Data Protection Act-aligned tiers from architecture stage, reviewed as scale increases.
IP / trademark disputes	Scholanet's registered trademark (Classes 9, 41, 42) or platform IP is infringed, or Scholanet inadvertently infringes another party's rights.	Low	Trademark filed and registered; IP holder (Scholanet Technologies) kept legally distinct from the operating entity.
Corporate structure / entity confusion	Ambiguity between Scholanet Technologies (IP/trademark holder) and its operating company creates legal or contractual confusion with partners.	Medium	Clear, documented separation of roles between the IP-holding entity and the operating company in all formal agreements.
Cross-jurisdiction compliance (South Sudan)	Deployments outside Uganda (e.g. SAADO EduTrack) are subject to different legal and regulatory regimes.	Medium	Jurisdiction-specific legal review before formal deployment in any additional country.
School admission/transfer policy override	Platform workflows are perceived to override an individual institution's own admission or transfer policies.	Low	Standing rule: Scholanet does not override individual institution admission or transfer policies — workflows support, not replace, institutional authority.

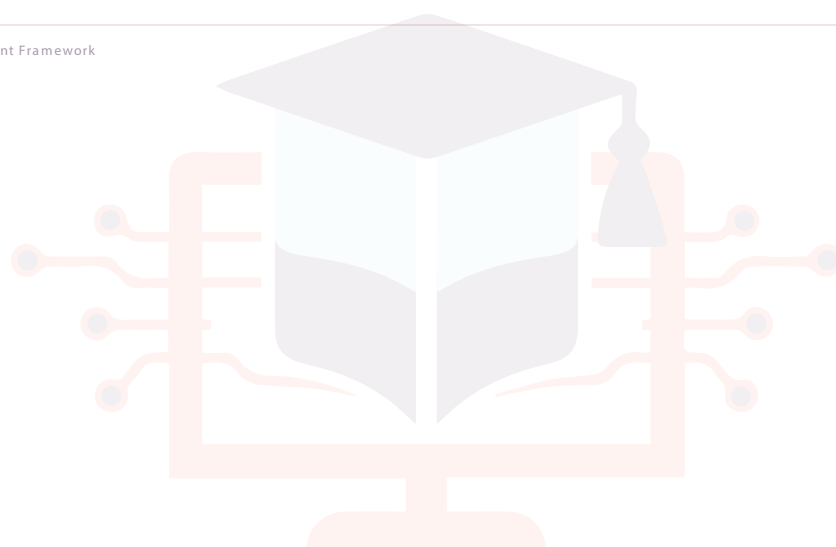


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12 Operational & Delivery Risks

Risks to Scholanet's ability to actually deploy, onboard and support schools, teachers and parents at the pace and quality the ecosystem model requires — spanning the Foundation, Pilot, Scale and National Ecosystem stages.

RISK	DESCRIPTION	SEVERITY	MITIGATION
Rural connectivity & infrastructure gaps	Schools outside cities and towns lack reliable connectivity, limiting the effective reach of the platform.	High	Offline-first architecture with differential sync designed specifically to reduce dependency on constant connectivity.
School onboarding capacity	The team's onboarding capacity cannot keep pace with the 48,000-institution planning target without adequate staffing.	High	Progressive scaling — Pilot before Scale — with onboarding capacity built up in step with verified demand, not ahead of it.
Fee-linked report release misconfiguration	Automated fee-linked report/receipt release logic (School CMS) is misconfigured, wrongly withholding or releasing student records.	Medium	Admin manual override always available with a logged reason; threshold configuration tested in pilot before wider rollout.
Teacher/school content quality variance	Content created through Teacher Studio varies widely in quality, affecting learner outcomes and platform credibility.	Medium	Content review and publishing workflow (create → publish access/purchase) rather than unmoderated direct publishing.
Mobile app dependency on app-store approval	Mobile availability is delayed by, or dependent on, Apple/Google app-store review and publication timelines.	Low	Android/iOS availability is only represented as live after official publication on the relevant app stores.



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13 Partnership, Funding-Claims & Reputational Risks

Scholanet's credibility with government, funders and institutional partners depends on never overstating what has actually been achieved, secured or agreed. This category manages the risk of premature or inaccurate public claims.

RISK	DESCRIPTION	SEVERITY	MITIGATION
Premature partnership announcements	An organisation is publicly identified as a Scholanet partner or funder before a formal relationship is confirmed.	High	Standing rule: no organisation is represented as a funding partner unless a formal relationship has been established; public identification only after confirmation.
Planning targets mistaken for achievements	Planning targets (1.5M learners, 48,000 institutions, 28,000 teacher opportunities) are read or reported as current enrolment or achieved impact.	High	All planning figures are explicitly labelled as targets, not current achievements, in every external document.
Impact claims published before verification	Impact or outcome figures are published before they have been measured and verified.	Medium	Actual impact figures are only published once measured and verified against the defined indicator set.
Scholanet Foundation represented prematurely	The future Scholanet Foundation is referred to as an established NGO or legal entity before formal registration.	Medium	The Foundation is not presented as an established entity until formally created and registered as applicable.
Procurement / contract expectation mismatch	Businesses or suppliers on the Business Portal assume RFQ participation guarantees a contract or award.	Low	Standing rule: Scholanet does not guarantee contracts or procurement awards through the platform.



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14 People & Capacity Risks

Scholanet's leadership and delivery capacity is concentrated in a small core team. Key-person dependency and hiring pace are managed as an explicit risk, not left implicit.

Key-person dependency Hiring pace vs. scale targets Technical/legal capacity gaps Volunteer/contractor reliance

Mitigation: documented governance roles (Section 05) so accountability does not rest on any one individual alone; phased hiring aligned to the Foundation Pilot Scale National Ecosystem stages rather than front-loaded commitments the organisation cannot yet support.

15 Consolidated Risk Register — Top Risks

RISK	CATEGORY	SEVERITY	OWNER	STATUS
Unauthorised exposure of learner data	Data Protection	Critical	Technical Director	Controls in design
Data breach / unauthorised access	Cybersecurity	Critical	Technical Director	Controls in design
Initial mobilisation shortfall (UGX 1B)	Financial	High	Executive Chairman	Actively mitigated
Slow institutional adoption	Strategic	High	Executive Chairman	Actively mitigated
Premature partnership announcements	Reputational	High	Legal Director	Standing policy in force
Rural connectivity & infrastructure gaps	Operational	High	Technical Director	Architecture mitigates
School onboarding capacity	Operational	High	School/Pilot Leads	Monitored at Pilot stage
Uganda Data Protection Act non-compliance	Legal	High	Legal Director	Controls in design

This is a summary view of the highest-severity risks only. The complete register — including Medium and Low severity items from Sections 07–14 — is maintained and reviewed in full at each governance cycle.

16 Monitoring, Review & Escalation

1. Quarterly review: the Risk & Governance Committee reviews the full risk register every quarter, re-scoring likelihood and impact and confirming owners.
2. Monthly reporting for High/Critical risks: owners of High- and Critical-severity risks report status and mitigation progress monthly.
3. Immediate escalation: any risk that moves to Critical, or any new safeguarding, data-breach or funding-misrepresentation risk, is escalated to the Executive Chairman immediately — not held for the next scheduled review.
4. Stage-gate review: the register is reviewed in full at each transition between implementation stages (Foundation Pilot Scale National Ecosystem).
5. Partner & funder visibility: a summary view of this framework may be shared with partners and funders as part of due diligence, consistent with Scholanet's transparency commitments.

17 Document Control

Version	1.0	Status	Governance & Board Resource
Prepared for	Scholanet Technologies — Board, management and partners	Next review	Quarterly, or at next stage-gate

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Important Disclaimer: This Risk Management Framework describes Scholanet's risk management approach, categories, severity assessments and proposed or in-progress mitigations. Unless expressly identified as implemented, verified or achieved, listed controls and mitigations represent planned or in-progress measures, not confirmed operational status. Severity ratings are judgement-based and subject to change at each review cycle. This document does not constitute legal, financial or regulatory advice and should be read alongside Scholanet's Institutional Profile and applicable governance policies.

Connecting Education. Creating Opportunity. Strengthening Communities.

Identifying risk early — so Scholanet can deliver responsibly at national scale.

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