

D2L ESG Report FY23

February 1, 2022 – January 31, 2023



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CEO Letter

As a student in university, I challenged myself with finding a problem that I could solve that would have the biggest impact on the world. Drawing on my experiences, I quickly set my mind on finding ways to transform the learning experience, which was mostly in-person or through traditional mail correspondence at the time. I knew that there were students living in remote areas who needed a better way to receive an education, that teachers needed a more efficient way to engage learners with feedback, and that new technologies needed to be a part of the solution. What started as a simple question about transformative change turned into a thriving business where we continue to explore new ways to make a positive impact on learning and the world through our technology.

At D2L, our mission is to transform the way the world learns. While this is no small feat, we make progress every year by developing technology that helps make learning more accessible, engaging, and inspiring. In close partnership with our customers around the world, our technology is making a difference.

One good measure that we are accelerating the impact on learning globally is our growth in win rates in higher education. In 2022, we captured 44% of new Higher Education Learning Management System (LMS) implementations across North America, Europe, Middle East, Latin America, and Oceania combined.¹ With over 1240 customers in over 40 countries around the world today, we are still at the early stages of our work to reach more learners – to help more people globally achieve more with their lives through better learning experiences.

Our world-class learning platform, **D2L Brightspace**, makes it easy to engage learners with content, build inspiring learning activities, enable collaboration, and

grow from personalized feedback on assessments. And our best-in-class service and support is there to help whenever called upon. Our flexible and robust learning solutions are for every stage of life, from the earliest days of school to higher education and into the working world. More recently, we expanded our product portfolio with the release of Creator+, a solution that simplifies the creation of highly engaging digital content, allowing instructors everywhere to create interactives, rich video, and practices.

Adapting in the Face of Change

In the last couple of years, like many other organizations, D2L has navigated through challenging times brought on by such events as the global pandemic that shuttered businesses and schools, and the subsequent effects of the pandemic and other economic forces on the macroeconomic environment. We have had to focus, adapt our approaches, and make some tough decisions about our workforce. However, while the markets fluctuated, we never wavered in our mission to support learning – in schools, at home, and in the workplace. We are moving into FY24 confident in the resilience of our markets and our strong business fundamentals; and we are motivated by our opportunity to continue to make a positive impact on those we serve and the world around us.

The events of the past few years have also shown us that now, more than ever, the role of education is the foundation for human progress, especially as we face a future impacted by digital disruption, climate change, and continued global social unrest. Technology-enabled learning has a critical role to play in supporting progress towards the achievement of the United Nations Sustainable Development Goals by improving learning experiences, making quality learning more accessible, and promoting lifelong learning opportunities for all.

¹MindWires, Higher Education LMS Market Dynamics Year-End 2022 Report

Our inaugural ESG Report summarizes some of the ways we are addressing the most significant environmental, social, and governance (ESG) issues relevant to our business and how we contribute to the achievement of these global Goals.

Governance

Strong corporate governance is integral to effectively managing our business and protecting the interests of all our stakeholders. Good governance is good business, and I am grateful to have an exceptionally talented Board of Directors made up of directors with a diversity of backgrounds, perspectives, skills, and experiences to support D2L.

Transforming the Way the World Learns

We deliver on our mission every day by building technology that makes an impact. D2L customers are the front lines of this impact, and we work closely with them to understand the ways in which D2L technology helps support improving outcomes, saving teachers time, personalizing learning, and increasing access to quality education. In FY23, I am proud to report we served over 16 million users around the world.

Our mission is also supported through inclusive product design, collaborative research, and social impact partnerships focused on giving back to our communities.

Operating with Integrity

Maintaining the trust of all our stakeholders – including our shareholders, employees, customers and the more than 16 million users we serve – is a top priority and a responsibility we take very seriously. As part of

upholding this trust, D2L maintains world-class data and security practices that protect and respect our customers' and users' information and maintain industry-leading service reliability standards. We also continue to support and expand our strong portfolio of security and compliance certifications to externally validate our controls.

Empowering our People

We continue to be recognized as both a top employer and for our work towards diversity, equity inclusion and belonging over the last several years. I am proud and grateful for the contributions D2Lers make every day to our culture, customers, and company, and we remain committed to working with our staff to create a diverse, equitable, and inclusive workplace each day.

Protecting the Environment

We all have a role to play in protecting our planet and mitigating the effects of climate change. We also know that education is both impacted by, and has a role in helping to address, climate change. This year, we focused on measuring our first data on the carbon emissions resulting from some of our operations, and we have identified areas for improvement. We are committed to this journey and building on our progress for greater impact in the future.

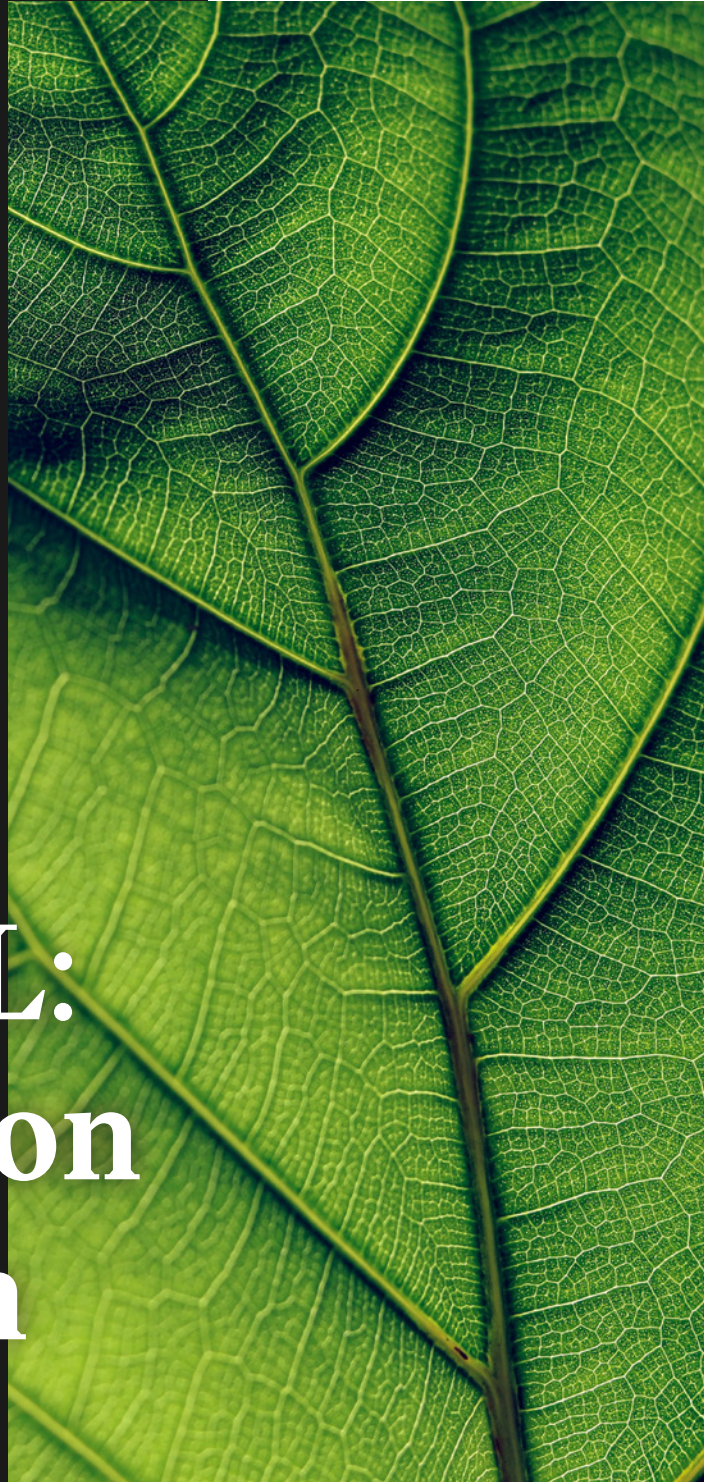
Building a lasting business means building a business that is in line with the principles of sustainable development. At D2L, we will keep building on our foundation to ensure we are doing business in a way that works towards our mission and reflects the needs of our communities and stakeholders today and well into the future.



John Baker, Founder and CEO

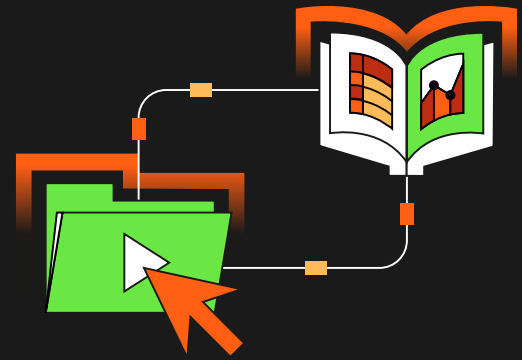
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About D2L: Our Mission and Vision



Our vision is a **better** world where learning can be accessible, engaging, and inspiring.

Our mission is to help **transform** the way the world learns.



We are a mission-driven company dedicated to transforming the way the world learns. We believe that everyone deserves access to high-quality education and training, regardless of age, ability, or location. Every day we work in partnership with our customers all over the world to support millions of people learning online and in person.

At D2L, we are focused on creating a unique learner-centric platform to personalize learning at scale. Our products are informed by learning science, supported by more than 20 years of expertise, and driven by a vision for a *better world where learning is more accessible, engaging, and inspiring.*

OUR PRODUCTS AND SERVICES

Our solutions are built for every stage of life – from the earliest days of school to higher education, the workforce, and beyond – and for different steps of the learning journey.

CREATE IT. ▶	TEACH IT. ▶	MEASURE IT. ▶	GROW IT.
Creator+ Provide easy-to-use authoring tools for efficient and effective learning	Brightspace Provide access to high quality education through technology	Performance+ Empower and enable learners & educators through data and insights	Wave Enable lifelong learning and corporate workforce engagement

Our product suite is centered around our learning innovation platform, **D2L Brightspace**. Brightspace is a scalable and flexible cloud-based software platform designed to help our customers deliver better learning experiences, both in-person and online. Creator+ and Performance+ are add-on products that offer content authoring and data analytics respectively.

D2L BRIGHTSPACE

BRIGHTSPACE IS BUILT WITH THE FOLLOWING CONSIDERATIONS TOP OF MIND:

- Easy and efficient to use, allowing teachers and instructors to do what they do best
- Accessibility for learners of different ages and abilities
- Strong security and privacy protection
- Personalization to meet the needs of different users, including faculty, learners of all ages, corporate leaders, etc.
- Extensibility, to integrate with other technologies
- Mobile for anytime, anywhere learning

D2L WAVE

D2L Wave streamlines workplace talent development, making it easier to build skills, ignite engagement, and empower employees to learn and grow.

OUR PROGRESS IN FY23

Founded in Kitchener, Canada, D2L Inc. (TSX: "DTOL") went public on the Toronto Stock Exchange in November 2021. In our first full year as a public company, we have continued to do what we do best.

WE CONTINUE TO INNOVATE ON OUR AWARD-WINNING PRODUCTS.

Creator+

This year, D2L released Creator+, enabling anyone to create engaging interactive digital course content. Creator+ uses workflows integrated into Brightspace to save course creators time, effort and money. With Creator+, users can more easily use ready-made templates, enhance engagement, insert flexible and highly accessible interactive elements and capture seamless screen recordings.



“Creator+ allows me to build immediate practice into my lessons for students. It makes reading more engaging and helps build confidence with new content.”

- **Keeri Hilp**
High School Teacher, TRECA

WE CONTINUE TO GROW IN OUR MARKETS

- D2L Brightspace captured **44%** of new Higher Education LMS implementations across North America, Europe, Middle East, Latin America, and Oceania combined in 2022²
- D2L has more than **16** million users
- D2L has customers in over **40** countries across **6** continents



*Location pins represent regions where D2L has a regional mailing addresses.

AND WE CONTINUE TO BE RECOGNIZED FOR WHAT WE DO.

//CODiE//
2022 SIIA CODiE WINNER

Best Customer Education LMS
and Best Learning Management
System Award - 2022



Training Industry Award
2020 - 2022



The Craig Weiss Group Awards –
Top 6 Learning Systems in
the World - 2023

A full list of awards D2L has won can be found on our website at <https://www.d2l.com/about/awards/>.

²MindWires, Higher Education LMS Market Dynamics Year-End 2022 Report

OUR HIGHLIGHTS FROM FY23



16+ million
users impacted globally

Served over
1,240 customers in
40+ countries across
6 continents

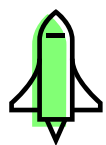
We are transforming the way the world learns by building technology that makes learning more accessible, engaging, and inspiring and making it easier to facilitate learning on any device, at any time, anywhere.

In FY23, we grew our customer base, with D2L Brightspace capturing **44%** of new Higher Education LMS implementations across North America, Europe, Middle East, Latin America, and Oceania combined in 2022.³



Generated **\$168.4M**
of revenue and employed
1,000+ people in FY23

We take our responsibility as a **worldwide employer** seriously and are proud to make a **positive economic impact**.



Launched
Creator+

We are always innovating on our platform and products to help our customers deliver better learning experiences, both in-person and online. In FY23, we launched Creator+, a product that enables anyone to create engaging interactive digital content. We conform with the **Web Content Accessibility Guidelines (WCAG) 2.1 Level AAA standards**, and maintain compliance with regulations such as US **Section 508 of the Rehabilitation Act, 1973**.



Maintained
conformance with
the highest levels of
accessibility standards
and regulations

We conform with the **Web Content Accessibility Guidelines (WCAG) 2.1 Level AAA standards**, and maintain compliance with regulations such as US **Section 508 of the Rehabilitation Act, 1973**.

Brightspace is also the platform of choice for many organizations that exclusively serve people with disabilities. During FY23, an additional five reputed organizations from Australia, Canada and USA who exclusively serve people with disabilities chose to use Brightspace. Such customer partnerships help us enhance Brightspace accessibility across all roles while helping serve people of all abilities.

³MindWires, Higher Education LMS Market Dynamics Year-End 2022 Report



Demonstrated strong leadership in security/privacy protection

We directly hold 5 data security certifications to protect our users and we are constantly adding to our wide array of security and privacy certifications. We hold ISO 27001, ISO 27017, ISO 27018, SOC 1 TYPE 2, and SOC 2 TYPE 2 certifications directly, and continue to expand our portfolio.



Upheld at least 99.95% uptime for our users

Maintaining industry-leading uptime standards for our users is a source of pride for us, as it is crucial for preserving trust with our customers who rely on service reliability.



Expanded the number of women in technical roles for the last three years

We understand the importance of increasing representation in technical roles and are working hard to help bridge the gaps.

Recognized as one of Canada's Best Diversity Employers for 2023

We are dedicated to building a diverse, equitable, and inclusive workforce at D2L so that we continue to be a place where people come to do their best work.



Employees donated 2,190+ hours of volunteer time (equal to over 273 days)

Passionate D2L employees gave their time this year to food banks, blood drives, fundraisers and many more community giving initiatives.

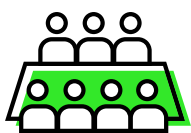


Governance

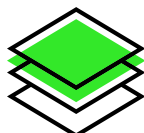
Our strong corporate governance is integral to effectively managing our business in an ethical, responsible and transparent manner and to protecting the interests of all our stakeholders. We have a well-established governance structure through which we set our corporate strategy, deliver against our objectives and monitor our performance. Our Board provides the ultimate oversight over the management and affairs of D2L and is guided by a formally adopted Board of Directors Mandate, which can be found on our website.

D2L is proud to have a Board made up of directors with a range of insights, perspectives, skills and expertise to support our business and the issues that affect our organization. In addition, we have a robust framework of policies and procedures to prioritize accountability through effective oversight and risk management.

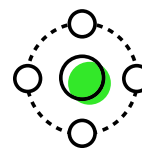
CORPORATE GOVERNANCE HIGHLIGHTS



D2L's Board is made up of **seven directors**, six of whom are independent



Our Board has **three established committees**: an Audit committee, a Corporate Governance and Nominating committee, and a Compensation committee



While **oversight for ESG ultimately rests with our Board**, ESG issues are paramount to our business and our ESG governance structure ensures that all levels of our organization are involved in ESG



All Board **committees are comprised of independent directors**



The Board and each of its committees have adopted **formal mandates or charters**



D2L maintains **formal, Board approved, policies which provide measures for accountability** and promote decision making in the best interests of the company, such as the Code of Business Conduct and Ethics, a Clawback Policy, and a Whistleblower Policy

For a more detailed overview of D2L's corporate governance policies, practices and procedures, board structure, risk oversight, director and executive compensation, and risk management, please see our most recently filed Management Information Circular ("MIC") available under D2L's profile on [Sedar.com](https://www.sedar.com) or our investor relations website at <https://ir.d2l.com/overview/default.aspx>

BOARD COMPOSITION AND DIVERSITY

Our Board is chaired by John Baker, founder and CEO of D2L, and supported by the experienced leadership of our Lead Independent Director, Ian Giffen.

BOARD COMPOSITION							
Name	John Baker	Ian Giffen	Tim Connor	Robert Courteau	Tracy Edkins	David Johnston	Heather Zynczak
Executive / Non-Executive Member	E	NE	NE	NE	NE	NE	NE
Independent		✓	✓	✓	✓	✓	✓
Woman					✓		✓
Age Group (Under 30 years old, 30-50, over 50)	30 - 50	Over 50	Over 50	Over 50	Over 50	Over 50	Over 50
Audit Committee		✓	✓	✓		✓	
Corporate Governance and Nominating Committee		✓	✓		✓	✓	✓*
Compensation Committee		✓	✓	✓	✓		

* Appointment took effect April 2023

○ Chair

In recent years, D2L embarked on a dedicated process to bring more gender diversity to our Board. We are pleased to have increased the representation of women on our Board to one third of independent Board members. D2L recognizes the significant value that diverse perspectives bring to organizational success, and we remain committed to intentionally seeking and including diverse viewpoints in our decision-making processes.

ESG Risk Management and Oversight

D2L works diligently to identify the most material ESG issues affecting our organization and to execute against our ESG objectives through a multi-step approach.

BOARD OVERSIGHT OF ESG

ESG is an integral part of our organization, and our Board maintains ultimate oversight over all ESG issues at D2L. The Board is supported in exercising its duties and responsibilities of oversight over ESG matters through a well-established ESG governance structure which is integrated into every aspect of our organization.

D2L's Board and board committees meet at least quarterly. The ESG initiatives at D2L are discussed at least biannually by our CGN Committee and the Board is updated at least annually with respect to the ESG program at D2L. Prior to public disclosure of ESG reporting, our senior leadership evaluates and confirms the accuracy of our disclosures, our CGN Committee reviews and recommends the disclosure for approval to the Board, which ultimately approves all public ESG disclosures.

In addition to the robust governance structure, D2L continuously undertakes initiatives to support the collective knowledge, skills and experience of our Board, senior leadership and our employees on sustainable development, including information sessions given by D2L employees and external consultants.

Our ESG Governance Structure

1 BOARD OF DIRECTORS

CORPORATE GOVERNANCE AND NOMINATING COMMITTEE

Our CGN Committee oversees the ESG program at D2L and is responsible for supporting the Board on matters such as the evaluation of the effectiveness, competencies and skills of directors, Board recruitment and periodic review of D2L's governance related policies and procedures such as our Disclosure Policy, Insider Trading Policy and Diversity Policy.

AUDIT COMMITTEE

The Audit Committee is responsible for assisting the Board in the oversight of matters such as financial reporting and disclosures; compliance; enterprise risk management; and complaints under the company's Whistleblower Policy and Code of Business Conduct and Ethics.

COMPENSATION COMMITTEE

The Compensation Committee is responsible for assisting the Board in overseeing D2L's policies, processes and practices relating to people management; compensation; succession planning; and diversity, equity, inclusion and belonging.

2

LEADERSHIP

All of our senior leaders contribute to the development and implementation of our approach to ESG, including our Chief Executive Officer, President, Chief Financial Officer (CFO), and Chief Legal Officer (CLO), who play integral roles in the implementation and oversight of ESG at D2L.

3

CHIEF STRATEGY OFFICER (CSO)

Our Chief Strategy Officer is responsible for monitoring and helping to drive the progress of our ESG initiatives, and in setting and achieving ESG targets, strategies, and goals. The CSO also reports to the senior leadership team, the CGN Committee and the Board on a regular basis.

4

ESG STEERING COMMITTEE

The ESG Steering Committee is a management-level committee which assists leadership and the Board with ESG-specific review and oversight by establishing a unified view of ESG across D2L, increasing understanding across the business and promoting robust standards of management, data collection, and decision-making as it relates to sustainability at D2L. The executive sponsor for the ESG Steering Committee is our CSO.

5

SUSTAINABILITY MANAGER

Our Sustainability Manager aligns our ESG activities across the business, drives action towards our goals and vision for ESG at D2L, and communicates across all levels of the business on ESG issues.

6

SUSTAINABILITY AMBASSADORS

Sustainability Ambassadors is an employee-level group which supports sustainability initiatives across the company and increases awareness of sustainability across D2L and to D2L teams, to support sustainability-informed decision-making.



MANAGING RISK

Risk management is fundamental to the achievement of our goals and protection of our business and stakeholders. Our Audit Committee is responsible for overseeing D2L's Enterprise Risk Management ("ERM"). Our Chief Legal Officer, with the help of industry consultants, established a formal ERM process, through which we renewed our identification of the key risks affecting the business. Executive-level risk owners were identified to manage risk plans. Principal risks are reported quarterly to the

Board and include details on issues, actions taken to address the risks, monitoring plans and any changes in the risk profile.

Our ERM process is tightly aligned with several of our material ESG issues including data security, data privacy, and human capital management. While climate change presents acute risks to our society and the communities in which we work overall, D2L's business faces relatively low levels of climate-related exposure.

ENGAGING WITH STAKEHOLDERS

We publicly report D2L's financial performance on a quarterly basis. Our leadership team maintains regular contact with our investors and analysts through face-to-face and virtual meetings and attendance at investor events throughout the year. One highlight from this past year was our CEO's presentation at the Toronto Stock Exchange's event on [The Future of EdTech](#).



ENFORCING OUR **CODE OF BUSINESS CONDUCT AND ETHICS**

All D2L employees, Directors and others performing work on behalf of D2L are required to abide by D2L's **Code of Business Conduct and Ethics** ("Code"). The Code promotes our values and holds anyone representing D2L to a high standard of ethical and honest dealing. Our Code is overseen by our Chief Legal Officer and the Board and covers issues such as conflict of interest, protection of our information and assets, compliance with local laws and regulations, and accountability. Specific responsibilities set forth in the Code are elaborated through D2L's internal policies, such as the Conflict of Interest Policy, Anti-Harassment and Discrimination Policy, and Whistleblowing Policy. All employees receive training on D2L's Code of Business Conduct and Ethics upon hiring and on an annual basis and are expected to abide by the Code in all their business dealings.

D2L maintains a strict Anti-Corruption Policy that covers all D2L personnel (Directors, officers, and employees, and independent contractors) and Third Parties (partner, distributor, agent, contractor, and / or representative consultant). Our Anti-Corruption Policy requires all personnel and Third Parties to regularly review the Policy, become familiar with the Code of Business Conduct and Ethics, and attend training, when applicable.

PROMOTING A **RESPONSIBLE SUPPLY CHAIN**

D2L strives to drive responsibility through our own supply chain.

- We have strong policies and commitments against slavery and forced labour, as demonstrated by our **Modern Slavery and Human Trafficking** statement and policy
- D2L conducts annual reviews of all UK vendors' Statements against Modern Slavery
- D2L maintains a Supplier Diversity Policy to promote procurement from businesses owned by individuals identifying as Black, Indigenous, People of Colour (BIPOC), Women, or disabled veterans
- We drive change through our supply chain by communicating with our supply chain actors on the importance of ESG issues and the expectations we hold of suppliers to be thinking about and working to lower their own impacts

02

ESG at D2L



Our approach to making a positive impact and the foundations of D2L's ESG efforts revolve around our company mission and vision.

D2L was founded with the mission to transform the way the world learns towards a vision for a *better world where learning is more accessible, engaging, and inspiring*. This mission and vision are weaved within the fabric of D2L and guide all aspects of our business.

Our talented team of passionate D2L employees engages with our customers, partners, and other stakeholders around the globe every day to make learning experiences better.

To achieve our mission and vision, it is equally important for D2L to be a responsible environmental steward, doing our part to protect the planet, while acting with integrity and managing risk through strong governance practices.

OUR ESG INITIATIVES AND BUSINESS ACTIVITIES ARE ALIGNED WITH THE UNITED NATIONS' SUSTAINABLE DEVELOPMENT GOALS (SDGS):



SDG 4: Access to Quality Education

D2L is helping to improve education by expanding how, where, and when learners can access learning experiences, and how instructors can innovate on and create learning moments to support learner success. Our customers use our products in primary and secondary schools, universities and colleges, corporations, governments, and non-governmental organizations globally.



SDG 5: Gender Equality

In our role as an international employer, we recognize the responsibility we have to promote gender equality within our own company, and in our communities. In FY24 we are launching Women in Action, an Employee Resource Group that will support women across the company. In addition, our Philanthropy program maintains several pillars, one of which is to increase access to education particularly for women. We use our pillars to determine which organizations we support through our Philanthropy program.



SDG 8: Decent Work and Economic Growth

Education is an essential foundation to promote social mobility and reduce income inequality by providing individuals with the opportunity to learn new skills and advance in their careers. D2L products, Brightspace and Wave, support workplace learning and development.



SDG 10: Reduced Inequalities

The digitization of education tools can help to reduce inequalities by meeting unique learner needs. By personalizing the learning moment through accessibility measures, preferred name capabilities, tools for teachers to measure and track student performance and provide additional support, D2L is helping to reduce inequalities in access to quality education.



SDG 17: Partnerships for The Goals

We believe that partnership is the clearest path to impact. We prioritize partnership in all our relationships – be it with customers, instructors, vendors, or employees. We contribute to greater social impact by partnering with philanthropic programs around the world to increase access to learning – both for students and teachers.



OUR MATERIALITY ASSESSMENT

D2L works throughout the year to invest in the issues important to our business and our stakeholders. In FY23 we conducted our first materiality assessment to confirm which issues our stakeholders prioritize, and which ESG issues have the biggest impact on our business.

Identifying our ESG focus areas is key to the effective management of the risks and opportunities deemed most relevant to our business. The following outlines our Materiality Assessment process.



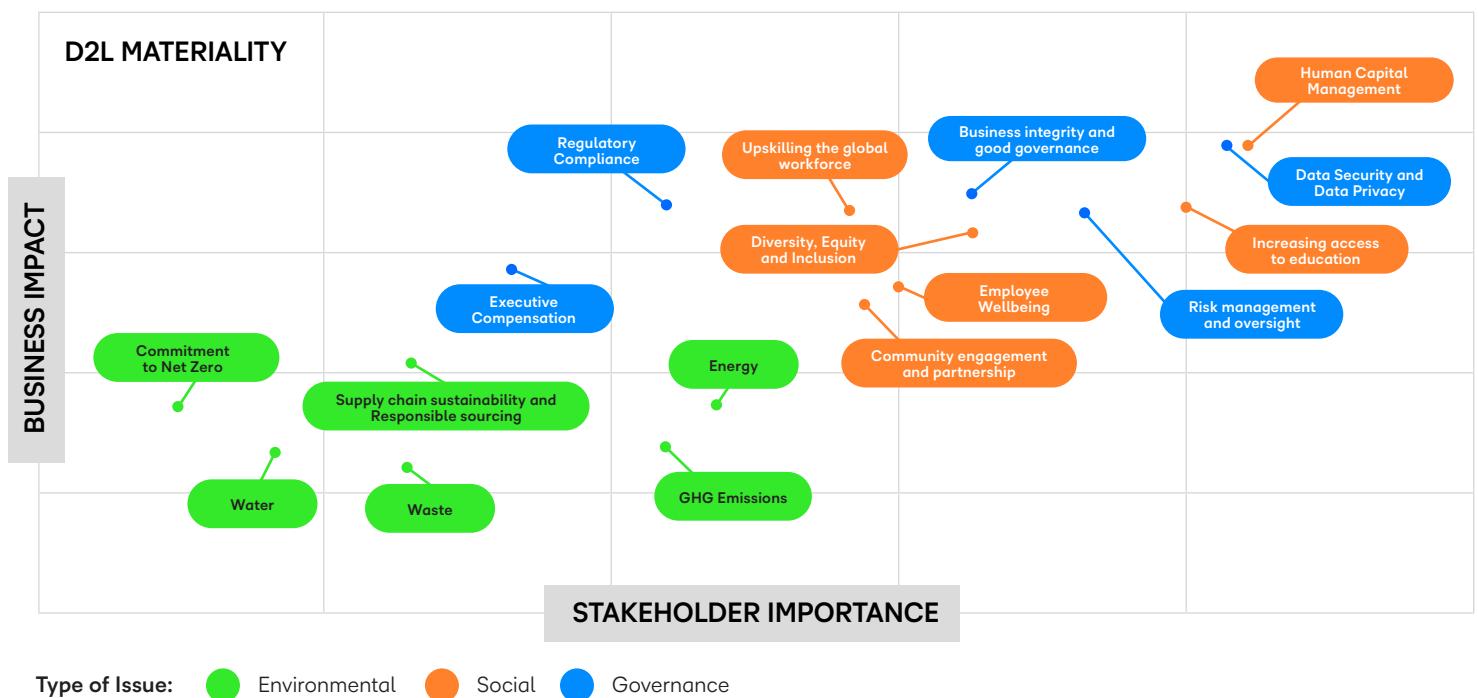
OUR PROCESS

- Conducted a prioritization assessment to confirm key topics among our stakeholders
- Conducted over 30 interviews and received over 120 survey responses to prioritize D2L's material ESG issues, aligned with relevant issues listed in the Sustainability Accounting Standards Board (SASB) and Global Reporting Initiative (GRI)
- Validated our final matrix with senior leaders from across the business



Our materiality analysis (both the process and final matrix) was reviewed and approved by our senior leadership, the **Corporate Governance and Nominating Committee** and the Board of Directors.

MATERIALITY MATRIX



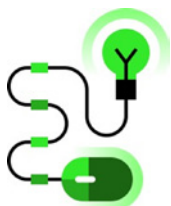
LOOKING AHEAD

D2L continues to monitor material ESG issues and their significance to our business and to our customers. In each of the following sections, we outline the governance, management, and business activities we undertake to mitigate potential negative impacts related to our material ESG issues. We apply the precautionary principle⁴ in the management of ESG issues material to our business and we continue to seek input on emerging ESG issues from our stakeholders.

⁴ The precautionary principle is set out in Principle 15 of the UN Rio Declaration on Environment and Development. It states: 'Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.' This definition is environment-specific, but the Global Reporting Initiative suggests that this principle should be applied to social ESG topics, as well.

OUR ESG PILLARS

Four ESG pillars help guide our corporate actions and provide a framework for D2L to make a meaningful difference and address our most significant ESG issues. This approach and our actions reflect our commitment to all our stakeholders, and the planet.



Transforming the way the world learns

We build technology that, in partnership with our customers, supports increased access to quality education, increased engagement in hybrid, in-person, and online learning formats, and that delivers learning experiences that help meet the needs of learners regardless of age, ability, or location. Our mission is also supported through social impact initiatives and partnerships focused on research and giving back to our communities.



Operating with integrity

Operating with integrity, including in our practices around strong data management, service reliability, and innovation, are critically important to all our stakeholders – our customers, shareholders, employees and beyond – and to our ability to serve these stakeholders and maintain their trust.



Empowering our people

Our success is dependent upon our employees' innovation, creativity, and collaboration. Our culture, benefits, diversity, equity, and inclusion efforts are critically important to making D2L a place where our employees can do the best work of their lives.



Protecting the environment

Being responsible corporate citizens includes measuring, addressing, and taking accountability for our environmental impacts. We are committed to doing our part to protect the planet.

Transforming the Way the World Learns

We are a mission-driven company striving to transform the way the world learns. This social mission is at the heart of who we are and inspires our employees.

At D2L, we proudly build technology that, in partnership with our customers, supports increased access to quality education, increased engagement in hybrid, in-person, and online learning formats, and that delivers learning experiences help meet the needs of all learners, regardless of age, ability, or location. The combination of this innovative technology, our passionate employees, committed customers, and strong social mission is what creates impact.

PARTNERING WITH OUR CUSTOMERS TO TRANSFORM LEARNING



D2L has more than 16 million users across 6 continents

In partnership with our customers, we help to increase access to quality education and training, support better learning outcomes, and help instructors save time, allowing them to focus on what they do best: Teach.



LEARNERS

D2L Brightspace supports students by facilitating learning on any device, at any time, anywhere. We reach every student through a variety of tools and functionality, including

- Embedding accessibility measures into our full design process
- Enabling mastery-based learning to allow students to proceed at their own pace; and
- Providing more personalized learning experiences to meet the varying needs of individual students

Brightspace helps to level the playing field and provide all students with the opportunity to succeed regardless of ability.



INSTRUCTORS

D2L products positively impact instructors by providing easy, time-saving ways of creating, delivering, and assessing learning. They can

- Access their students' data for more focused and timely interventions in areas of difficulty
- Enable personalized learning to provide targeted support and help improve their learners' outcomes with unique learning pathways
- Save time by automating routine tasks like providing feedback and grading assignments



ORGANIZATIONS

D2L's products support the economy by helping organizations to upskill and reskill their employees to build individual and organizational economic resilience and strengthen organizational outcomes.

With Wave and Brightspace, organizations can easily deliver training and professional development to employees, track progress against learning targets, and invest in the development of their people.



Saving teachers time with Michigan Virtual

Michigan Virtual's school programming is designed to be delivered asynchronously. The school aims for all student work to be graded within 72 hours of submission to provide students with regular and timely updates on their progress.

During the COVID-19 pandemic, Michigan Virtual set out on a mission to help schools and educators adapt to each learner's unique needs. To do this, they focused on reducing administrative workload for educators to increase time spent developing course content.

Michigan Virtual implemented Brightspace QuickEval, which pulls all student submissions into a single portal.

“QuickEval has made assessment much easier by organizing files and presenting rubrics on screen. We have seen greater consistency in grading patterns proving to us that [it is] helping teachers do their best work.”

~ Dr. Shannon Smith, Senior Director of Student Learning Services



Improving Student Success and Student Engagement with Georgia State University

GSU uses data and analytics from Brightspace as early indicators for larger university-wide targets on student success. The data has supported the university in implementing support measures and strategies for student engagement.

As a result, for the past six years African American, Latinx and Pell Grant students have graduated at or above the rate of the student body overall, and GSU has conferred more bachelor's degrees to African American students than any other institution in the United States. At the time of this case study, written in 2021, GSU had increased graduation rates for African American and Latinx students from around 20% to 70% at the Atlanta campus. In the following year, this number increased to an 84% graduation rate amongst these student groups.



Personalizing learning and improving outcomes with Gwinnett County Public Schools – Online Campus

Gwinnett Online Campus uses D2L Brightspace to personalize learning for over 1,720 students. The use of individualized learning paths has helped improve student and staff morale. In Fall 2020, students maintained a 90.8% pass rate across all full courses delivering personalized learning.



Improving access during the pandemic with Putnam Northern Westchester Boards of Cooperative Educational Services (PNW BOCES)

When the pandemic hit, D2L Brightspace helped accelerate the launch of remote professional learning options for over 1,000 teachers in New York State. Digitizing learning resources allowed PNW BOCES to efficiently continue to develop their teachers' learning in the midst of the COVID-19 pandemic.

BUILDING TECHNOLOGY THAT MAKES A DIFFERENCE

ACCESSIBILITY

Accessibility is critical to making learning more inclusive and is a key priority for D2L as we strive to reach every learner. Nearly 1.85 billion people experience some form of disability.⁵ Accessibility is our way of meeting needs through the practice of inclusive design. To us, accessibility is about enabling choices for our users (learners, instructors, and administrators) to allow every user to reach their full potential.

We also believe that partnerships lead to the greatest impact. For this reason, we play a role in building and supporting an inclusive education ecosystem.

- **Partner** with accessibility-focused organizations (like **Fable**) who help us practice inclusive design by including people with disabilities at every stage of product development. This, in turn, verifies that our accessibility features in Brightspace meet the sensory, physical, and cognitive needs of users
- **Host an in-person Accessibility Lab** at our annual Fusion conference and developed an **Online Accessibility Lab** as a Brightspace course to continue building knowledge with Brightspace users
- **Provide an Accessibility Gateway** to our customers leading to our **Accessibility Academy, Accessibility Library, Accessibility Discussions and Accessibility Interest Group** for a regularly updated set of resources



At D2L, accessibility happens by design. Our purposeful practice of Inclusive Design spans our full product development cycle. We put the user at the center from the very beginning and design to help them meet their diverse teaching/learning needs. This is one way that we are helping to transform the way the world learns.

⁵ Return on Disability, 2020 Annual Report: The Global Economics of Disability, 2020

- **Facilitate an Executive-level Accessibility Advisory Board** made up of executive-level leaders from across our customer base and invited experts. This board meets quarterly to explore emerging educational practices and technologies that help remove barriers to access in education
- **Partner with the National Federation of the Blind's (NFB) Strategic Nonvisual Access Partnership** program since 2016
- Support public policy development through representation on:
 - Postsecondary Education Standards Development Committee under the Accessibility for Ontarians with Disabilities Act, 2005
 - Global Leadership Council of the International Association of Accessibility Professionals, where D2L is an organizational member
 - Advisory Council of the Canadian Accessibility Network
 - W3C's Web Content Accessibility Guidelines Silver Community Group

D2L conforms with the **Web Content Accessibility Guidelines (WCAG) 2.1 Level AAA standards** and compliance with regulations such as **Section 508 of the Rehabilitation Act, 1973**. We post our accessibility reports publicly on our **Accessibility Standards** page.



D2L's Global Accessibility Lead, **Dr. Sambhavi Chandrashekar**, PhD, CPACC was recently accepted as a member of the IAAP - International Association of Accessibility Professionals' prestigious Global Leadership Council. Dr. Chandrashekar is a recognized accessibility champion and an award-winning inclusive educator and researcher. She has 15+ years of strategic and direct operational experience in implementing technology-based accessibility projects and is passionate about helping transform the world into a more inclusive place.



“One of the main things that attracted us to D2L’s Brightspace platform was its rich accessibility options. In addition to the platform being compatible with a range of screen reader programs, the built-in Accessibility Checker allows us to detect accessibility issues in our courses in the production phase, before they are released to our workforce.”

- **Laura Hendrey**
Learning and Development Coordinator, Vision Australia

RESEARCH PARTNERSHIPS

D2L partners with institutions, academics, practitioners, and other experts on research projects linked to learning, technology, and inclusion topics. Research conducted in-house and in partnership has many benefits: (i) the products we develop are designed to help make learning experiences better; (ii) we are supporting our growing community of customers and users; and (iii) we are contributing to the broader dialogue and knowledge base around education, training, and skills. The following are examples of some of these efforts:

**1**

D2L Labs explores the potential for technology to transform the future of learning, including in partnership with researchers and innovators from across our customer base. Our D2L Labs program explores how emerging technologies can be leveraged to enable new ways of learning. Some of these technologies include:

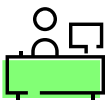
- Artificial Intelligence (AI)
- Large Language Models (LLM)
- Machine Learning (ML)
- Natural Language Processing (NLP)
- Image processing
- Virtual Reality (VR)
- Augmented Reality (AR)
- Mixed Reality (MR)
- Distributed ledger and related technologies such as blockchain, smart contracts, and directed acyclic graphs (DAGs)

Our findings serve as an input into our product roadmap and future company direction. A selection of past **D2L Labs** projects are available on our website: <https://www.d2l.com/labs/>



2

Research Grants: D2L and Purdue launched a \$25,000 grant program to recognize Purdue individuals and/or teams at Purdue University to support research and tool development to improve instructors' experience on the Brightspace platform and support learner success. [See past projects from awardees on the Purdue website.](#)



3

D2L Teaching and Learning Studio:

The Teaching and Learning Studio is a space for teachers, professors, instructional designers, and education leaders to find new, innovative, and strategic ways to help build better learning experiences. With access to experts and up-to-date research, the [D2L Teaching and Learning Studio](#) gives educators the chance to build personal and professional skills, become part of a community of likeminded educators, and learn about new and current teaching techniques and practices. The D2L Teaching and Learning Studio includes:

- Teach & Learn Podcast
- Master Class Series
- Teaching and Learning Blog



“It’s so important as educators and learning practitioners to keep our fingers on the pulse of change, to hear from our peers, and to expand our perspectives, knowledge, and know-how when it comes to creating learning experiences that resonate with students and get results. That’s why I’m so happy we have the D2L Teaching and Learning Studio to share wisdom, ideas, and stoke the passion within us all to teach — and to learn.”



Dr. Cristi Ford,
VP of Academic Affairs at D2L



Whitepapers & Policy Briefs

- **Future of Work and Learning Whitepaper Series:**

D2L publishes an annual whitepaper detailing recommendations for employers, higher education institutions, training providers and governments to better support the development of lifelong learning and skills development. This series aims to inspire action on a long-term vision for education and training that is more technology-enabled, sustainable, inclusive, and empowering for learners. Original research, as well as broad stakeholder outreach, is captured in this series as we aim to promote a system that supports a learning-integrated life

- **Research and Policy Briefs on the Future of Teaching and Learning:**

Our research papers and policy briefs provide research-based guidance and best practices that are actionable by educators, schools, districts/boards and policy makers, and address real challenges. Through partnerships and presentations, we widely and freely share this research and guidance. Since 2020, our policy briefs and research papers have explored how the pandemic is reshaping virtual K-12 learning, how schools can build resilience and enhance equity and inclusion, and how to modernize professional learning and reduce teacher burnout. This research is often conducted with the support of external practitioners and experts

OPPORTUNITIES TO LEARN TOGETHER

Every year, D2L hosts several events to bring together our customers, users, peers, and colleagues to continue to learn together.

Fusion is our annual three-day conference where we learn from each other, share updates on Brightspace and Wave, and ideas on innovative ways customers and instructors are using our products. D2L also hosts an annual **Executive Summit** alongside Fusion to provide a forum for executive leadership in K-12, higher education, corporations, and governments to discuss the challenges and solutions that lie ahead on the future of work and learning.



GIVING BACK TO OUR COMMUNITIES

PHILANTHROPY PROGRAM

At D2L, we are committed to giving back to the community and harnessing the power of our passionate employees to make a difference. Through our Philanthropy Program, we leverage D2L technology and funds, along with employee time and strengths, to support our corporate mission and vision, and strengthen our communities through the following pillars:

1 Supporting our Mission & Vision: Corporate Cause Partnerships

Ultimately, we believe education is the foundation on which all human progress rests. To this end, D2L sponsors, and/or participates in multi-year programs and partnerships with organizations around the world aimed at leveraging our expertise in learning technology to support improved access to quality education and training. Currently, these partnerships and/or programs include →



Wilfrid Laurier University's Educator and Leadership Institute (ELI)

D2L is a proud partner of ELI, which was developed by the Wilfrid Laurier University Faculty of Education to build teaching and leadership capacity in communities globally. The ELI model is based on educator-to-educator professional learning to foster enhanced outcomes for students.

In 2021, ELI produced a series of online, self-paced courses covering topics in **Leadership, Mathematics, Science and Technology** and **Special Education**. All courses are available in both English and French, with content that meets pedagogical best practices, and includes regional contexts. The online delivery is made possible with D2L's **Open Courses platform**. The new self-paced courses are available to ELI partners in Haiti, Nepal, and Egypt.



Save the Children

D2L is proud to be supporting Save the Children's education program for girls and boys in the Colombia-Venezuela region. This program specifically aims to realize the right to safe, gender-responsive, quality learning for children (aged 5-18) affected by the crisis along the Colombia-Venezuela border.



FORA

Fora: Network for Change offers programs that aim to challenge the status quo by advancing the full participation of young women and people who experience gender-based discrimination in leadership and decision-making spaces. D2L is a proud sponsor of Fora's annual Global Summit and has provided mentorship and guidance to delegates, helping cultivate a new generation of young leaders. Since getting involved in 2018, 107 young changemakers have participated in the Global Summit program, with over 1,300 people participating in the annual Global Summit public events.



Strengthening our Communities: Community Giving Program

Through our Community Giving Program, D2L provides donations, sponsorships, and coordinates matching campaigns to support organizations contributing to the betterment of our communities. Our focus areas for sponsorship requests include Access to Education, Kids Mental Health & Wellness, and Community Building.

⁶ Government of Canada, Moment of reckoning for household food insecurity monitoring in Canada, 2022

⁷ U.S. Department of Agriculture Economic Research Service, Food Security Status of U.S. Households in 2021, 2021

⁸ United Kingdom Parliament Research Briefing, Food poverty: Households, food banks and free school meals, 2021



SUPPORTING SCHOOL NUTRITION PROGRAMS

In FY23, we paid particular attention to the importance of school nutrition programs that allow students to attend school well-nourished and ready to learn.

In Canada, prior to the pandemic, food insecurity affected 12.7% of households (approx. 4.3M people), many of which include children. Since the onset of the pandemic, estimates suggest a 39% increase in the prevalence of household food insecurity⁶ In the United States, 10.2% of households experienced food insecurity in 2021⁶, and 4.2 million people, including 9% of children were in food poverty in 2021⁷ in the United Kingdom.⁸

D2L matched over \$5,000 of employee donations to *Nutrition for Learning*, *Food4Kids*, *Breakfast Club of Canada*, *No Kid Hungry*, *Magic Breakfast*, and the *World Food Programme School Feeding Initiatives* for a total donation of over \$10,000 across these organizations.



Sharing our Time: Volunteer Time-Off (VTO) Program

We support our employees to be active in their communities. Through our VTO program, we offer employees two paid workdays per year to volunteer for causes of their choice. Some of our employees use their volunteer hours to support local food banks and donate blood, for example.

One of the highlights this year involved D2L employees learning about Indigenous culture and Reconciliation alongside Anishnabeg Outreach, an Indigenous-led organization, and supporting the harvest of seasonal food for Indigenous community members. In total, D2L employees gave over 2,190 hours of their time (equal to over 273 days) in FY23.

SUPPORTING THE EDUCATION COMMUNITY



Robb Nash Project

The Robb Nash Project uses music and storytelling to engage students on difficult topics such as suicide, addiction, self-harm, and anxiety.

During the COVID-19 school closures, our content team supported the Project in digitizing content for at-home access for students. Through this partnership, students have access to four modules containing stories of other young people learning how to navigate the challenges brought on by mental health issues.



T4 Education

As a strategic partner of T4 Education, D2L joined with other companies and organizations to support the World's Best School Prizes. This contest celebrates schools everywhere for the pivotal role they play in developing the next generation of learners and for their enormous contribution to progress and society. The prizes award \$250,000 to winning schools around the world that demonstrate excellence in Community Collaboration, Environmental Action, Innovation, Overcoming Adversity and Supporting Healthy Lives.



RESPONDING TO GLOBAL EVENTS

Events over the past year challenged the education progress made around the world in previous decades. Specifically, access to education is at risk for many populations around the world living in and near conflict zones.

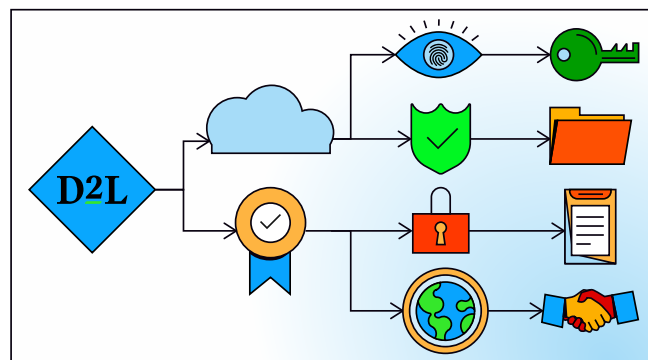
One such global event is the war in Ukraine, which has disrupted almost every part of daily life, including the education of many young people and the ability to make a living. To support Ukrainians, D2L matched employee donations made to the Canadian chapter of the International Committee of the Red Cross (ICRC) for Ukraine. In total, over \$16,000 was contributed to the ICRC's efforts to support Ukrainians facing the reality of war on the ground.

Additionally, at the outset of the war, D2L opened a fast-track recruitment process for Ukrainians interested in applying to our job openings.

Operating with Integrity

The opportunity to serve **16 million users** (including children) across more than **40 countries** is a privilege and a responsibility we take very seriously.

As a trusted partner to educational institutions, governments, and companies, we maintain **world-class data practices that protect and respect our customers' and users' information** and uphold industry-leading service reliability standards.



These data practices, including the governance and management of our customers' data, are integral to the success of our customers, and to the trust we work hard every day to earn and keep as their LMS provider.

In many jurisdictions where our customers operate, data privacy and data security are viewed as human rights, particularly in the protection of our younger students' personal information.

This is a right we respect and intend to do our part to uphold.

To that end, D2L

- Complies with all relevant regulations and helps keep learners protected by abiding by policies and procedures built from best-in-class guidance
- Maintains several globally recognized data security and data privacy certifications
- Continuously updates our practices as new information becomes available

DATA HOSTING

Our platform and products (Brightspace, Creator+, Performance+, Wave) are cloud-based SaaS products. D2L hosts our platform on Amazon Web Services (AWS), a world-leading cloud platform provider. The AWS data centers we rely on are located in countries with comprehensive laws governing data privacy and security. D2L is not monitoring, blocking, content filtering or censoring data by request from any government. We do not, to our knowledge, have customers⁹ based in countries where governments are monitoring, blocking, content filtering or censoring data.

The AWS data centers we rely on are located in the following countries:

- United States
- Canada
- Ireland
- Australia
- Singapore
- India

⁹ An institution's billing entity

Data Security

DATA SECURITY LEADERSHIP

Our Chief Technology Officer oversees our data security policies, procedures, and certifications. Our data security team is led by our Director of Information Security, who is responsible for D2L's security program, including people, information, product, and technology audit and compliance.

D2L also relies on a dedicated Information Security Compliance (ISC) team. ISC works independently and reports to our Vice President of Product Operations. This team is responsible for:

- Completing internal and external security and compliance audits
- Ensuring information security policies and procedures comply with leading global standards, such as ISO 27001, ISO27017 & ISO 27018
- Enforcing and updating policies and procedures
- Actively monitoring, identifying, and mitigating information security risks

PROTECTING OUR CUSTOMERS' DATA SETTING HIGH STANDARDS FOR VENDORS AND PARTNERS

We require all vendors and partners to adhere to our Third-Party Security Policy, owned by our Chief Technology Officer, and we thoroughly assess their data security and data privacy practices through our Vendor and Partner Assessment Process prior to partnership.

MAINTAINING TRUST

We share our [security best practices](#) and [security policies and protection controls](#) on our website for transparency and easy reference.







D2L provides regular training and simulations for our technology, engineering, and development teams so that response times and decision-making are always in peak condition. D2L has experienced no reportable security breaches. There are several ways in which we secure customer data:

- 1 Logical separation of customer data:** Hardware and software configurations are designed to provide secure logical separation of customers' user data. The D2L Brightspace service supports delegated authentication.
- 2 Network security measures:** Multiple layers of external firewalls, intrusion-detection & prevention sensors, security information and event management tools, continuous vulnerability scanning and external penetration testing.
- 3 Redundancy and scalability:** Load-balanced networks, pools of application servers, and clustered databases are features of D2L's design.
- 4 Customer-controlled privacy and security settings:** Access to different categories of data, customizable password rules, defined log-off times for inactivity.



D2L requires all employees to participate in annual data security training and maintains policies and controls on Information Security Risk Management, our Risk Assessment Process and our Security and Privacy Incident Management Procedure.

Should an incident arise, D2L has robust processes in place to address issues in a timely, responsible, and transparent manner. Our **Security and Privacy Incident Management Process** can be initiated by a D2L customer, internal D2L employee or the public. If a security incident is identified, the following process is followed:

- 
1. Monitoring and Awareness: A security and/or privacy incident is identified, communicated to the Security Incident Response Team (SIRT) and D2L's Chief Privacy Officer
- 
2. Detection and Analysis (triage): The incident is assessed to determine the severity, priority, scope and impact. This step can include evidence preservation and containment activities
- 
3. Mitigation: Recommendations are created and executed to contain, eradicate and/or contain the incident in question
- 
4. Recovery: Containment is complete. Where applicable, scanning of environments occurs to verify that recovery is complete
- 
5. Communications: This can include communications with internal resource teams, stakeholders and D2L customers. Based on the findings of triage and analysis, the appropriate communications are drafted, approved and shared
- 
6. Post-Incident Activity: In this stage, lessons learned are completed to gather feedback and evolve incident response process and procedures. Where applicable, root cause is identified and logged



OUR SECURITY & COMPLIANCE CERTIFICATES

Over the years, we have built a strong portfolio of certifications and controls. We hold ISO certifications directly, rather than through suppliers and we align with the NIST 800-53 cybersecurity controls. We are currently provisionally certified under TX-RAMP. The certifications we maintain are:

- ISO 27001: 2013 Information Security Management
- ISO 27017: 2015 Cloud Security Management
- ISO 27018: 2019 Protecting Personal Data in the Cloud
- SOC 1 TYPE 2
- SSAE18 Certification: SOC 2 TYPE 2
- **Self-assessments:**
 - CLOUD SECURITY ALLIANCE (CSA)
 - SECURITY, TRUST AND ASSURANCE
 - REGISTRY (STAR)

A complete list of our security and compliance certifications is available on our website at <https://www.d2l.com/security/compliance/>

Data Privacy

RESPECTING AND PROTECTING THE PRIVACY OF OUR USERS

D2L is committed to protecting the privacy of customers' data, and we are acutely aware of the additional sensitivity of our youngest learners' privacy and the responsibility that comes with its protection. D2L's products process and store individual data, and some of our valued partners process individual user data through their own systems. To protect our learners with the highest quality privacy measures, D2L requires partners to demonstrate compliance with applicable international laws and globally recognized data privacy certificates and standards.

Data Privacy Leadership

Our Chief Legal Officer is also D2L's Chief Privacy Officer. She works with D2L's experienced privacy and ISC teams, to execute D2L's privacy processes and protocols, including compliance with applicable privacy and data-protection laws. Our Chief Legal Officer reports to our CEO.

Operating with Transparency

D2L operates within full compliance of federal, state, provincial, and international laws regarding data privacy and protection. We have received zero complaints from regulatory bodies and outside parties involving breaches of customer data that were substantiated by the organization and involved personal data. Our policies and processes are in full compliance with:

- GDPR (The General Data Protection Regulation 2016/679)
- FERPA (Family Educational Rights and Privacy Act)
- COPPA (Children's Online Privacy Protection Act of 1998)
- PIPEDA (Personal Information Protection and Electronic Documents Act)
- LGPD (Brazilian General Data Protection Law)
- Australian Privacy Act of 1988
- Singapore Personal Data Protection Act (PDPA)
- EU-U.S. Privacy Shield Certified



“D2L was the only LMS provider that talked to us about privacy and security laws—and that’s absolutely essential for a healthcare organization.

– **Keith Fraidenburg,**
Chief Operating and Innovation Officer,
CHIME

As a proud signatory of the Student Privacy Pledge, D2L is wholly committed to the privacy and protection of customer and user data in our platform and products, particularly of our youngest users. None of our products (Brightspace, Creator+, Performance+, and Wave) collect, track, target, use or sell learner data for advertising purposes.

Our Policies and Processes

D2L maintains a robust set of data privacy policies. All of our privacy management information is available through our [Privacy Centre](#), which lists our [CCPA Notice](#), and our [Privacy Statement](#). In addition to our customer-focused policies and processes, we are also doing our part to educate our employees. We require all D2L personnel to complete an annual privacy and security training and D2L communicates with all personnel about privacy and information security awareness throughout the year. Should an incident arise, D2L has robust processes in place to address issues in a timely, responsible and transparent manner. Please refer to our Security and Privacy Incident Management Process described above (pg 34).



Service Reliability

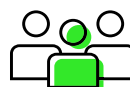
DELIVERING SERVICE RELIABILITY

D2L's systems are built on robust IT infrastructure supported by policies and procedures to equip our teams to respond diligently to customer needs.

Service Reliability Highlights



We consistently deliver a **99.95%** global uptime



1,240+ customers have subscriptions to our Brightspace platform, 100% of subscriptions are cloud-based



In FY23, we had an average of **0.6** minutes of downtime per month per customer site

Business Continuity Planning

As part of our strategy to maintain high service reliability, D2L works closely with AWS to put proper recovery plans in place in the event of disruptive events (e.g., power outages, climate events).

We maintain a Business Continuity Plan (BCP) to prepare D2L in the event of extended service outages caused by factors beyond our control (e.g., natural disasters, technical failures), and to restore services to the widest extent possible in a minimum time frame. The BCP is reviewed and updated on a continual basis and is overseen by D2L's Vice President of Information Technology.



While we are prepared for extraordinary circumstances, we also maintain a host of methods to provide service reliability on a day-to-day basis:

1. We share our uptime data publicly through our [Status Portal](#), which is updated every 60 seconds
2. We track service reliability by checking for the availability of the D2L services from internal and external sources once every five minutes in addition to a variety of other internal monitoring tools
3. Our 24/7 support team works to keep our system running smoothly to reinforce our global customer base during their peak times



Minutes of downtime per month per customer site

FY21	FY22	FY23
2.1	25.6	0.6

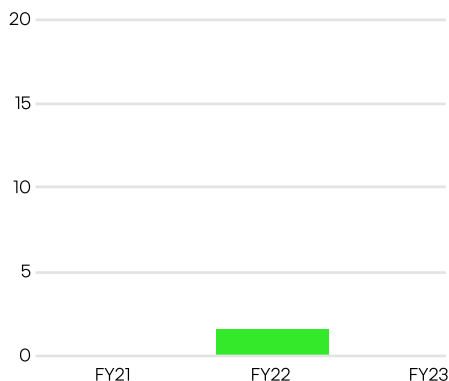


Total customer downtime in minutes per site

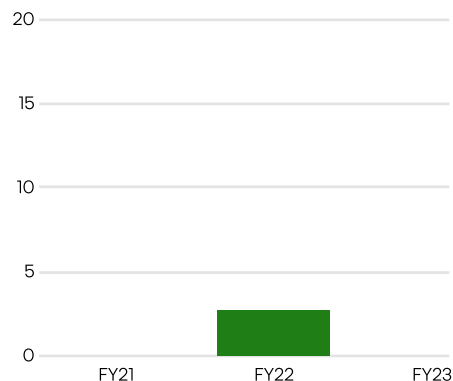
FY21	FY22	FY23
25.5	307.3	7

Note: AWS suffered three major outages beyond D2L's control in FY22 which unfortunately impacted our customers.¹⁰

Performance issues causing client downtime for 10 - 30 minutes



Number of significant service disruptions (total)



¹⁰ AWS suffered three major outages in FY22 which unfortunately impacted our customers. Following these outages, AWS provided D2L with a statement on the cause of the failure and detailed action items that are currently being undertaken to mitigate impact if the issue were to reoccur again. D2L has documented these instances internally to support mitigation efforts through future software updates. We have seen a vast improvement in uptime rates this year, in part resulting from this partnership with our cloud provider.

Intellectual Property and Innovation

D2L operates within a highly competitive industry that relies on a combination of trademarks, copyrights, and patents to secure innovation and compete effectively. Building on our innovation and protecting our intellectual property (IP) is critical to our success as a software company.

Intellectual Property Leadership

Protection of intellectual property (IP) is jointly managed by our Chief Strategy Officer, Chief Legal Officer and our President.

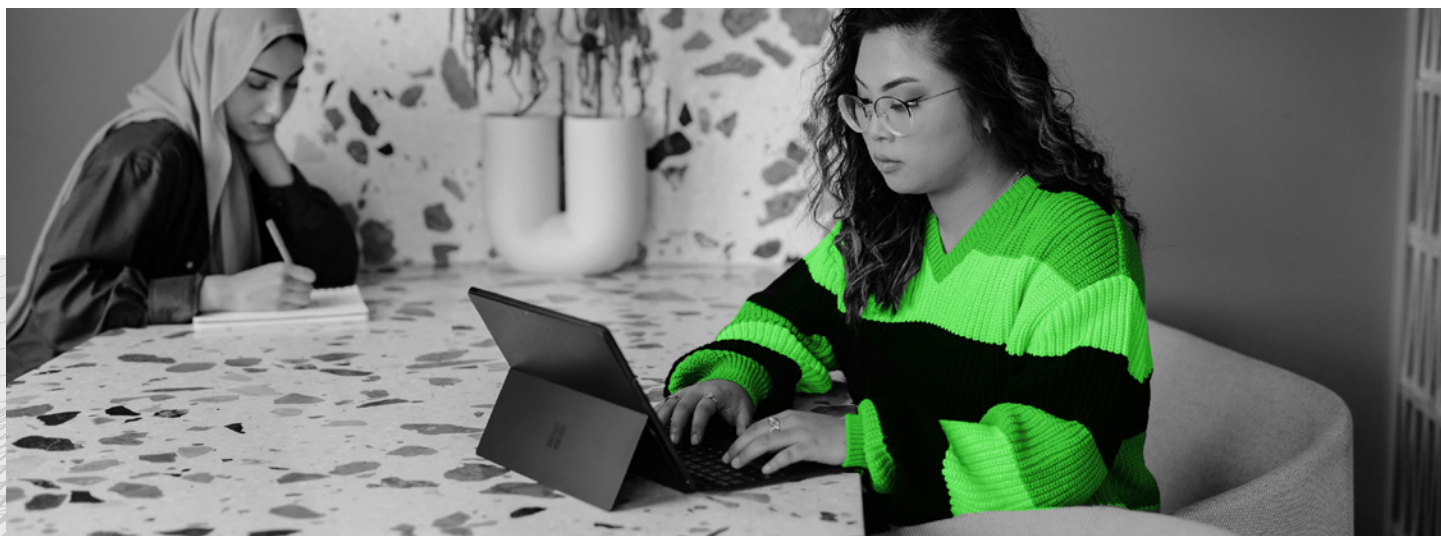
SAFEGUARDING OUR INTELLECTUAL PROPERTY RIGHTS

At D2L, maintaining our IP is critical to our success as a business, and in turn, our ability to increase access to education, serve our customers, and provide safe, creative, and reliable learning experiences. We maintain policies and processes to protect D2L's IP, including our branding, content, and software developments. We respect the IP of others and value contributions both from our employees and external consultants.

D2L holds patents in Australia, Canada and the United States, and trademarks in USA, Canada, EU, Australia, Singapore, Mexico.

A list of our **trademarks and patents** is publicly available on our website. We maintain Employee Confidentiality, Inventions and Non-Solicitation Agreements so that our innovations are kept confidential. We have also emphasized the importance of confidentiality in our Code of Business Conduct and Ethics, to which all employees must adhere.

We incentivize employees to contribute to software innovation through our Inventor Incentive Program. The program provides financial rewards for any employee contributing to D2L's IP portfolio and recognizes the employees' contributions internally. We also recognize all employee invention disclosure submissions for potential patentability at a D2L Inventors banquet, typically held annually.



CONTRIBUTING TO THE SOFTWARE INNOVATION COMMUNITY

We encourage our Brightspace customers to develop innovations to expand their product experiences by providing them with an expansive set of datasets, [APIs](#) to pull and push data into our products, as well as user interface components written by D2L that are available under open-source licenses and hosted on [GitHub](#).

Our software products use several third-party libraries, components, and frameworks that we license from third parties, including those covered under open-source licenses. D2L actively seeks to contribute back to the communities that support the open-source libraries, components, and frameworks that we use.



“Supporting open standards is entrenched in D2L’s DNA. We care deeply about **building** a learning platform that is a hub to an **open** ecosystem of over hundreds of integrated technologies. We work hard to give our customers choice and easy **integration** through open standards,”

– **John Baker**,
President and CEO of D2L

Interoperability with Other Software Providers

We are proud to serve the community as active contributors in key 1EdTech industry standards, such as Learning Tools Interoperability (LTI) Advantage, Learning Information Services (LIS), OneRoster and Caliper. The 1EdTech community spans K-12, higher education, and edtech suppliers collaborating to build an open, trusted, and innovative digital learning ecosystem at every level.

Currently, D2L leads the industry in 1EdTech certifications. For our clients, D2L’s collaboration with 1EdTech means that customers can easily connect Brightspace with thousands of products to create a seamless user experience and enhance data privacy.





Total number of employees

FY21 > 1,000

FY22 > 1,100

FY23 > 1,000



Geographic distribution of employees

89%

EMPLOYEES LOCATED IN NORTH AMERICA IN FY23

11%

EMPLOYEES LOCATED GLOBALLY, OUTSIDE OF NORTH AMERICA IN FY23

D2L's people are the heart of our business and the key to our success. Maintaining a strong, healthy, and inclusive workforce is critical to achieving both our business targets and our mission.

Empowering our People

People And Culture

D2L is proud to employ over 1,000 people across several countries. We know that a truly diverse, global team supports our mission to transform the way the world learns through enhancing innovation, awareness, and understanding of the world around us. The majority of our employees are located in Canada, and we have employees in the United States, Australia, United Kingdom, Brazil, and Singapore.

PEOPLE AND CULTURE LEADERSHIP

Our Senior Vice President (SVP) of People and Culture is responsible for overseeing employee relations, including compensation and benefits, health, safety and wellbeing, talent attraction and retention, and diversity, equity, and inclusion and belonging at D2L. Our SVP of People and Culture reports directly to our CEO.

CREATING AN AWARD-WINNING CULTURE

D2L puts people first by providing a flexible and fun culture that allows employees to learn, grow, and contribute. Employees come to D2L to do the most impactful work of their lives through solving critical challenges to build the future of learning. Our leadership competencies put our values at the core of who we are.



Lead by Example



Deliver Awesome Outcomes



Be Talent Magnets



Be Boundaryless



Focus on Better, Smarter, Faster



Win Hearts and Minds

All people data is based on the average of monthly breakdowns over 12 months of Fiscal Year ending January 31, 2023, unless otherwise stated.

EMPLOYEE ENGAGEMENT AS A PERCENTAGE (CULTURE, TEAM BUILDING...)

In FY23, 85% of employees rated their engagement as engaged or actively engaged on a 5-point scale¹¹

TOTAL NUMBER OF EMPLOYEES WHO TOOK PARENTAL LEAVE, BY GENDER, IN FY23

In total, 50 employees were on parental leave in FY23



Men - 22%



Women - 78%

INDUSTRY-LEADING BENEFITS

We care deeply about our employees' well-being, and we know that compensation and benefits is an important part of the support we provide to our employees. Each D2L employee is entitled to a comprehensive range of benefits including medical, vision and dental coverage, mental health support and wellbeing workshops. Our coverage includes travel assistance and life insurance. Because employee care goes far beyond medical insurance, D2L also provides the following:

- Wellness fund
- Home internet and mobile subsidy for employees
- Retirement contributions
- Learning and development support
- Referral bonuses
- Recognition program
- Global Mobility Program
- Personal and wellness days
- Learning days
- Volunteer days
- Competitive vacation policy
- Parental leave

Most of our employees worked from home in 2022. To support employees' health and safety while working from home, employees can request support for ergonomic workspace set-up options through our facilities team.

EMPLOYEE WELLBEING

Wellness is about more than just benefits and medical insurance. At D2L, we make wellness a priority. We provide resources for employees to learn more about wellness supports, like Mental Health and Burnout Prevention Toolkits.

Our wellness subsidy covers exercise memberships, certified personal trainers, and race fees. D2L employees also have access to frequent sessions on aspects of wellbeing for a diverse range of employees and circumstances. D2L maintains health and wellness policies overseen by our SVP of People and Culture. Our policies allow employees to receive the support they need to do their best work.

¹¹We define employee engagement as the extent to which employees feel passionate about their jobs, are committed to the organization, and put discretionary effort into their work. Our People & Culture team conducted engagement and retention one-on-one interviews with over 650 employees between February and July of 2022. A global range of employees were selected to participate from across the business and at all levels of seniority.

INVESTING IN OUR PEOPLE

We are committed to helping each D2L employee reach their full potential. We provide both external and internal training support.

D2L employees are entitled to generous financial support and time each year to develop their skills and continue their learning. Our Catch the Wave program provides access to courses offered through leading universities on topics related to D2L's operations, strategy, and goals. D2L employees receive two paid days off to complete courses. We also provide internal learning and development opportunities, such as:



Our LEAD Program (Learning, Engagement And Development) helps employees move to the next level in their careers - nominated participants take part in reflection and reviews on leadership competencies, leadership meetings and skills development sessions, and check-ins with sponsors and leaders



Our Technology, Engineering and Design teams take part in an annual internal conference to keep up to date with evolving trends and innovate on our products and services



We host internal career fairs to support career growth and exploration and Stay Interviews to understand employees' evolving needs



People leaders attend a monthly Leadership Community session to build knowledge on a variety of leadership topics



We ask all leaders to meet quarterly with their direct reports to discuss performance and career development, including goal setting, check-ins and regular feedback

NUMBER OF EMPLOYEES IN OUR LEAD PROGRAM IN FY23	16
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AVERAGE HOURS OF TRAINING PER YEAR PER EMPLOYEE IN FY23¹²	34 hours/employee
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¹² Includes onboarding, internal professional development sessions, sales training, training for our technical, engineering, and design teams and an estimate of professional development by employees through our Catch the Wave program, delivered on D2L Wave.



RECOGNITION FOR OUR PEOPLE AND CULTURE STRATEGY

We are proud to have been recognized for our efforts in making D2L a great place to work.



Canada's Best Managed Companies, Platinum Member (2013-2022)



Canada's Top Employers for Young People (2012-2014, 2018-2023)



Canada's Best Diversity Employers (2023)



Waterloo Area's Top Employers (2011-2022 + 2023)



Canada's Best Employers for Recent Graduates (2019- 2022 + 2023)



The Candidate Experience Award (2019-2022)



Excellence Awardee for Canadian HR Awards



Best Workplace Culture



Glassdoor Best Places to Work (2022)



HRD Canada's 5-Star Benefits Program (2022)



¹³ Includes onboarding, internal professional development sessions, sales training, training for our technical, engineering, and design teams and professional development by employees through our Catch the Wave program, delivered on D2L Wave.

Diversity, Equity, Inclusion and Belonging (DEIB)

At D2L, we are committed to building and fostering a culture where our employees feel valued, included and enabled to do the best work of their lives.

Promoting DEIB at D2L means recognizing and valuing the inherent dignity and worth of all our employees and stakeholders, regardless of race, ethnicity, gender, sexual orientation, religion, age, ability, or any other characteristic, aligning with the principles of human rights. By promoting DEIB, D2L is working to contribute to advancing human rights more broadly.

Our current Diversity, Equity, Inclusion and Belonging efforts are focused across **5 Action Pillars**:

1. Collecting Diversity Data
2. Training and Enablement
3. Increasing our ability to attract, hire, and retain diverse talent
4. Building Awareness
5. Reviewing Processes, Policies, and Programs

1 COLLECTING DIVERSITY DATA

We collect and report on diversity data across several diversity characteristics to help us identify and action areas of under-representation.

D2L is constantly seeking to learn more about our workforce and where we can fill gaps in representation. We work with external consultants to conduct DEI surveys with staff. We intend to continue these information gathering exercises as we grow our teams.

Women now make up 43% of all people leaders at D2L. Within our significant locations of operation (countries where we have a concentration of employees), we are proud of the progress we are making towards creating greater representation and equality throughout our workforce.



¹³ Management includes all Vice President-level team members and up. Technical includes all members under our technology, engineering and design teams, product management and product operations.

¹⁴ The race/ethnicity data only includes employees who have opted to self-identify in Canada and the United States.





Percentage of gender and racial/ethnic group representation for

1. Management
 2. Technical staff
 3. All other employees
- in FY23¹³

	 WOMAN	 MAN
MANAGEMENT	25%	75%
TECHNICAL	25%	75%
OTHER	55%	45%



Black, Indigenous, People of Colour (BIPOC)¹⁴

	 IDENTIFYING	 NON IDENTIFYING
MANAGEMENT	14%	86%
TECHNICAL	31%	69%
OTHER	26%	74%

2

TRAINING AND ENABLEMENT

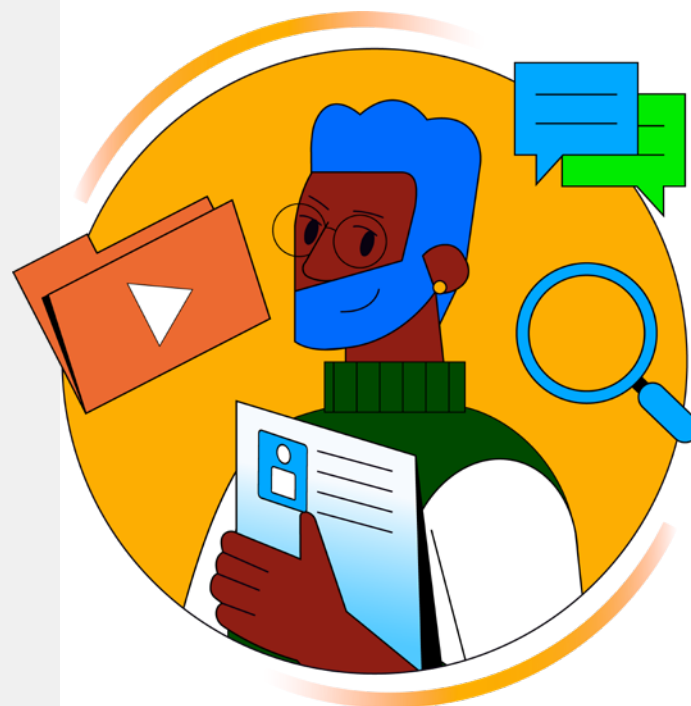
We deliver internal training opportunities to enhance employee and manager knowledge and organizational expectations specific to DEIB topics.

We know that belonging – the goal of diversity, equity and inclusion – can only exist when we are self-aware, engaged, and open. As a learning organization, we are dedicated to growth, and provide several opportunities for our staff to develop their awareness, leadership, and self-reflection capabilities. We host regular trainings with staff, required training for new hires and annual training for people leaders on anti-harassment and antibias topics.

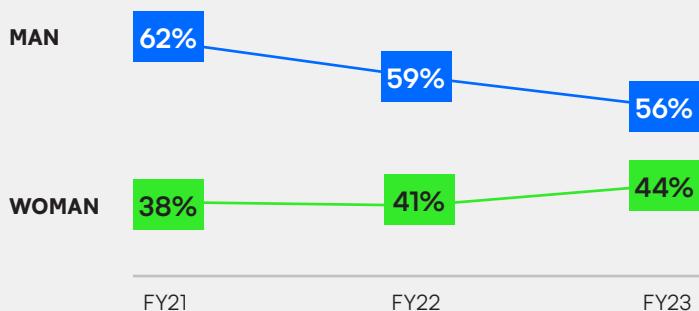
- All new hires attend a "DEIB at D2L" session which provides information on our programs, resources, strategy, and policy as part of the onboarding process
- All employees are required to complete two courses upon joining D2L. These courses are repeated annually:
 - » Safe and Inclusive Workspaces: Anti-Harassment Training
 - » Accessibility for Ontarians with Disabilities Act
- All people leaders are required to attend a "Workplace Anti-Bullying, Violence, Harassment, Discrimination and Retaliation" training session upon joining D2L or moving into a people leadership role. This course is repeated every two years

- Employees have access to several on-demand DEI-focused courses through our internal professional development program, Catch the Wave (delivered on our Wave platform) as well as live learning sessions hosted periodically throughout the year

We are committed to preventing incidents of discrimination, and training is one of the ways in which we protect our employees. In the event of an incident, employees are encouraged to follow our Whistleblower Procedure or speak to their direct People and Culture Representative. We are proud that we continue to have zero reported incidents of discrimination.



EMPLOYEE GENDER DIVERSITY



3

INCREASING OUR ABILITY TO ATTRACT, HIRE AND RETAIN DIVERSE TALENT

D2L, like many businesses, is experiencing a competitive market for attracting and retaining highly skilled talent.

We believe DEIB strengthens innovation and is pivotal in continuing to build great products, solve important problems and better serve the needs of our global customers. We are working to continue to advance diversity efforts with specific initiatives.



Recruitment. We are working to combat implicit and unconscious bias in our recruitment processes. We are:

- Using inclusive language in job postings
- Improving diversity of hiring teams
- Shifting from a 'culture fit' to a 'culture add' mindset
- Building partnerships with VanHack, Path 2 Canada and QueerTech to attract and hire talented individuals who bring diverse perspectives and lived experiences
- Hosting career information sessions for women in underrepresented communities in partnership with diverse student groups at universities



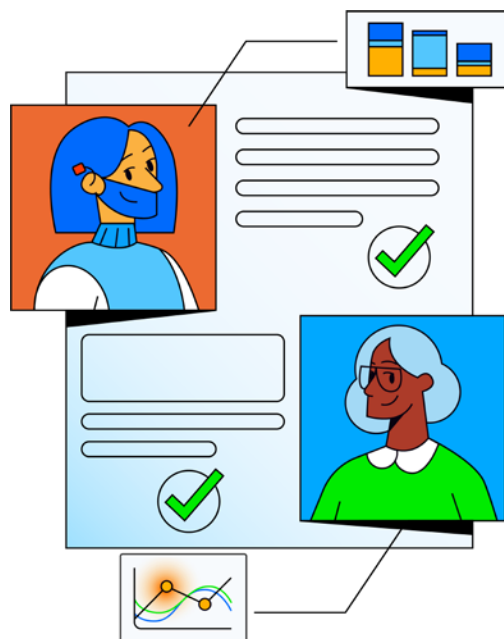
Support. We know increasing DEIB means breaking down barriers. Currently, we:

- Offer career development workshops to provide visibility into the interview processes
- Provide inclusive parental leave and benefit offerings, and flexible work arrangements including hybrid and remote work options



Systems Approach. We are creating pipelines of 'new talent through:

- Active engagements with postsecondary institutions through our campus ambassador program
- Co-operative education and experiential learning programs
- Participation in job fairs
- Involvement with technology-oriented communities



4

BUILDING AWARENESS

D2L drives activities to enhance manager and employee awareness of DEIB-related topics throughout the company. In addition to our training opportunities, we:

- Maintain three Employee Resource Groups (BIPOC Employee Network, D2LGBTQ+, and Women in Action) with executive-level oversight and engagement
- Support several Lean In Circles which provide groups of D2L women space to discuss work-life balance, career advancement, and simply connect based on shared interests and support
- Publish a monthly newsletter on DEI to support employee education and awareness
- Hosted an internal podcast that provided an educational resource and space for discussion on various DEI issues. Recordings remain available to employees

In FY23, we rolled-out Inclusion Toolkits to support team members and people managers on addressing bias, discrimination and increasing inclusion. These have been made available to all team members through our internal systems.

5

REVIEWING PROCESSES, POLICIES, AND PROGRAMS

Our team continuously reviews our People policies, programs, and processes from a DEIB lens so that our policies embed belonging and do not pose barriers

to any of our employee groups. Our policies include:

- Diversity, Equity, Inclusion and Belonging Policy
- Supplier Diversity Policy
- Whistleblower Policy and Process
- Anti-Bullying Violence Harassment Discrimination and Retaliation Policy and Procedure
- Health and Safety Policy



Our efforts to operationalize DEIB efforts go beyond our internal workforce. D2L takes care to include our product users in our progress. In 2022, we are excited to have released **preferred name** capabilities, which allows administrators to define a preferred first and last name of any learner. Once a user's preferred name is set, it appears in Brightspace in place of their legal name - on attendance sheets, test results, and anything linked to their learner profile.

Building belonging and ensuring our employees are well-supported are top priorities. To continue building on our efforts so far, our next steps include:

- Working to understand intersectional diversity at D2L and employees' sense of belonging throughout our global workforce
- Increasing communications from senior leadership members on these topics
- Increasing our support of diversity-championing events such as diverse career fairs

Protecting the Environment

At D2L, we know that a healthy environment is a human right¹⁵ and that we all have a role to play in protecting our planet and mitigating the effects of climate change. That is why we are taking a holistic approach to sustainability.

Through our materiality assessment, all stakeholders discussed the potential impacts of a continually declining physical environment on our collective ability to provide consistent and quality education around the world. We have seen climate-related events, such as smog, drought, and flooding, that temporarily prevent school attendance. Mounting climate anxiety amongst young people has led to student strikes and protests, and rising temperatures are impacting the built environment in both residential and commercial sites.

We also know education plays a role in helping address climate change and its lasting impacts. For these reasons and more, we are working to play our part to understand and reduce our footprint and help mitigate the impacts of climate change on education.

A sizable portion of D2L's environmental impact is linked to our partnerships with our suppliers. One of our largest suppliers is our cloud provider, Amazon Web Service (AWS). Amazon.com Inc., the parent company of AWS, has committed to 100% renewable energy power by 2025 and net zero carbon by 2040.^{16,17} At D2L, we are also working to minimize the impacts within our own control. As we continue our sustainability journey, we intend to increase our positive impacts while monitoring and where possible, reducing, our current negative impacts.

Monitoring our Environmental Impact

We use several methods to govern and monitor our impacts on our planet.

COLLECTING DATA

In FY23, we worked with suppliers to collect available data from the last four years and understand our starting point. This resulted in partial Scope 1, 2 and 3 emissions data. We are working with suppliers to source more fulsome understandings of our emissions portfolio for disclosure in future years. This year, we have provided the data we have based on what is available from our suppliers.

ENERGY INTENSITY AND TYPES OF ENERGY INCLUDED IN THIS RATIO (FUEL, ELECTRICITY, HEATING, COOLING, STEAM):

ENERGY INTENSITY PER USER IS 0.000130 MWH

ENERGY INTENSITY PER DOLLAR OF REVENUE IS 0.0000124 MWH

¹⁵ Office of the United Nations High Commissioner for Human Rights, [Frequently Asked Questions on Human Rights and Climate Change](#)

¹⁶ [Amazon, Renewable Energy](#)

¹⁷ [Amazon, The Climate Pledge](#)



SCOPE 1:

Our Scope 1 emissions are derived from energy purchased for the purposes of direct heat in our office spaces.

SCOPE 2:

Scope 2 emissions are derived from electricity use in our office spaces, and steam in our Vancouver office.

SCOPE 3:

Scope 3 emissions are derived from air travel. We are working with suppliers to source a greater breadth of data in future years.

WATER CONSUMPTION IS BASED ON USAGE IN OFFICE SPACES.

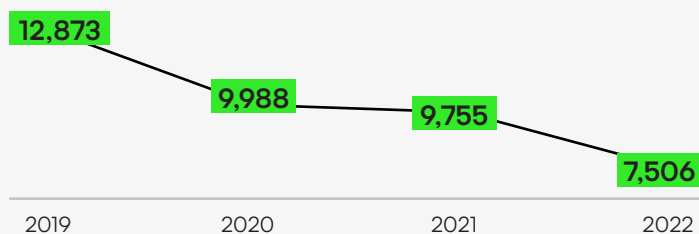
BUILDING POLICIES AND PROCEDURES

We employ several tools to support our employees in contributing to lowering our environmental impact and ensuring we are acting as responsible stewards of the environment.

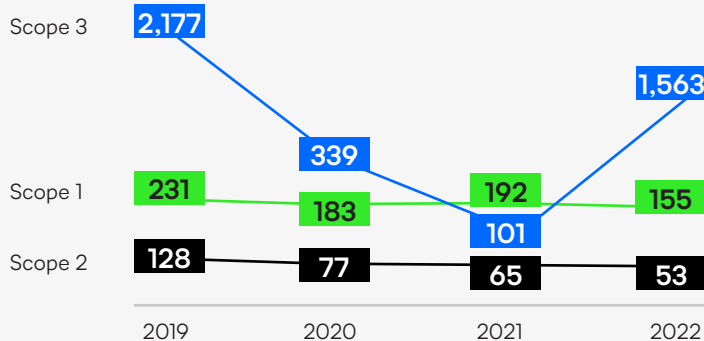
- We use an internal **Supplier Code of Conduct** to outline social and environmental criteria we expect of our partners
- In FY24, D2L is working to update our **Procurement Policy** to screen, track and monitor our supply chain impacts

Total energy consumed (gigajoules)

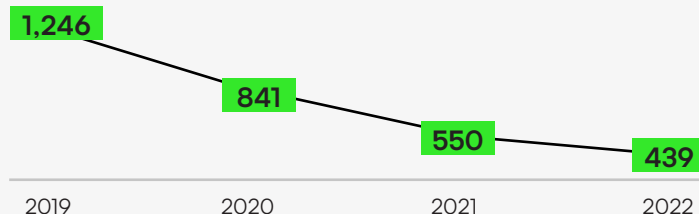
Based on electricity, steam, and natural gas consumption within office spaces



GHG emissions in tons of CO₂e



Total water consumption (m3)



NOTES

1. Consumption rates are primarily calculated based off square footage of office space in buildings where we have leases. In some instances, data dating back to 2019 from our office spaces was unavailable. In these cases, D2L estimated consumption rates based on the closest known consumption. We moved out of our headquarters in Kitchener, ON in FY23 and temporarily rented office space in Kitchener, ON while transitioning to our new office space. Data related to our temporary stay is unavailable. Our co-working spaces in London, UK (occupied from 2019 - present) and Toronto, ON (occupied from November 1, 2022 - present) are not included in these numbers because data is unavailable.

2. Consumption rates of electricity and gas declined at the Kitchener location due to occupancy decline in the building which had a large effect on the consumption. The building also completed a Building Automation System upgrade which may have led to reduction and optimization of cooling and heating loads within the building. Our Vancouver office heating runs on steam. Steam consumption spiked in 2020 and 2021 due to several factors including weather and less occupancy in the buildings. In addition, there were operational changes to heating setpoints that account for part of the drop in consumption in following years.

3. Calculations for carbon emissions as a result of electricity use in our Australia office spaces were provided by the landlords. Scope 3 emissions calculations are provided by our travel management company. Flights cancelled or refunded in 2020 as a result of the COVID-19 pandemic are reflected in the emissions calculations for FY21 and FY22.

ENGAGING EMPLOYEES

Our employees are passionate about the planet. In FY23, we launched a Sustainability Ambassadors Program to collect ideas and lead change. This has led to several new initiatives, as well as increased awareness and participation in older initiatives. With our passionate employees beside us, we intend to build on our initiatives over time.

Sustainability at the Office:

- Reused furniture from our previous office space
- Ceramic dishes and reusable cutlery in kitchen spaces
- Recycling and composting stations
- Technology to moderate temperatures and optimize light use
- Centralized document centers and double-sided printing
- Donating old technology in Canada and the UK
- EV charging stations
- Shower, lockers and bike storage and repair stations
- Delivering pay stubs digitally
- Eliminating most business cards

Raising Employee Awareness:

- Our ECO Plan provides financial incentivizes for employees to ride bikes, take public transit, or walk to work rather than drive to the office
- Our employees support internal awareness by sharing tips and tricks for improved personal sustainability measures
- We have hosted lunch and learn sessions with teams across the company bring awareness to ways we can all lower our footprints at work and at home, including issues like personal sustainability, and green software engineering

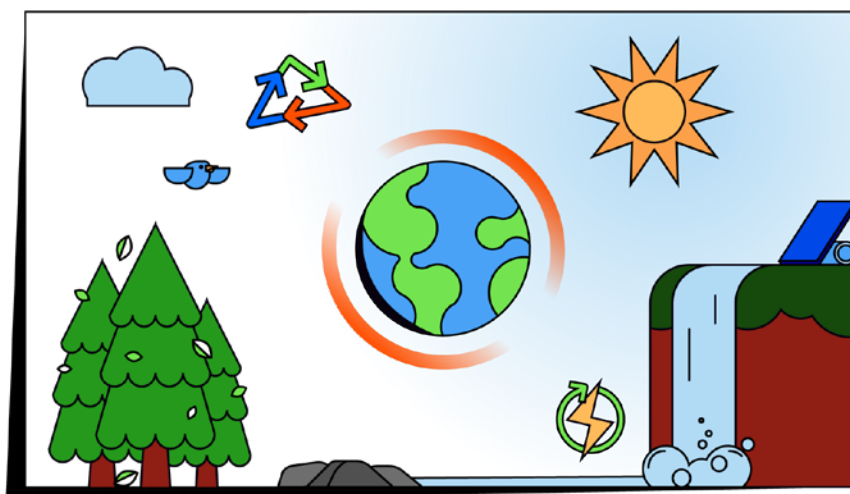


SUSTAINABILITY AMBASSADORS

Our employees are passionate and engaged in improving our environmental footprint. Our Sustainability Ambassadors lead employee engagement on sustainability issues through our company. Ambassadors act as a grassroots initiative-building team. They support decision-making on employee engagement, ideation on in-house projects and areas where we can reduce our impact.

Our Global Events Team is Reducing the Impacts of our Events:

- Including sustainability criteria in our sourcing of venues, caterers, and marketing 'props', where possible
- Finding alternatives for branded marketing goods



FINDING ALTERNATIVES TO MARKETING SWAG

Each year, D2L hosts InFusion, an internal conference for team members across our technology, engineering and design teams to share ideas and learn from each other. This year, our planning team chose to take on several initiatives to reduce the impacts of event-related marketing swag.

- Provided an 'opt-out' button for conference registrants
- Localized gift options, as much as possible
- Prioritized consumable gifts rather than material items
- Donated remaining funds and funds derived from employees who opted out of their event gifts

In total, our InFusion planning team donated over \$11,500 to food banks in Canada, Australia, and the UK.



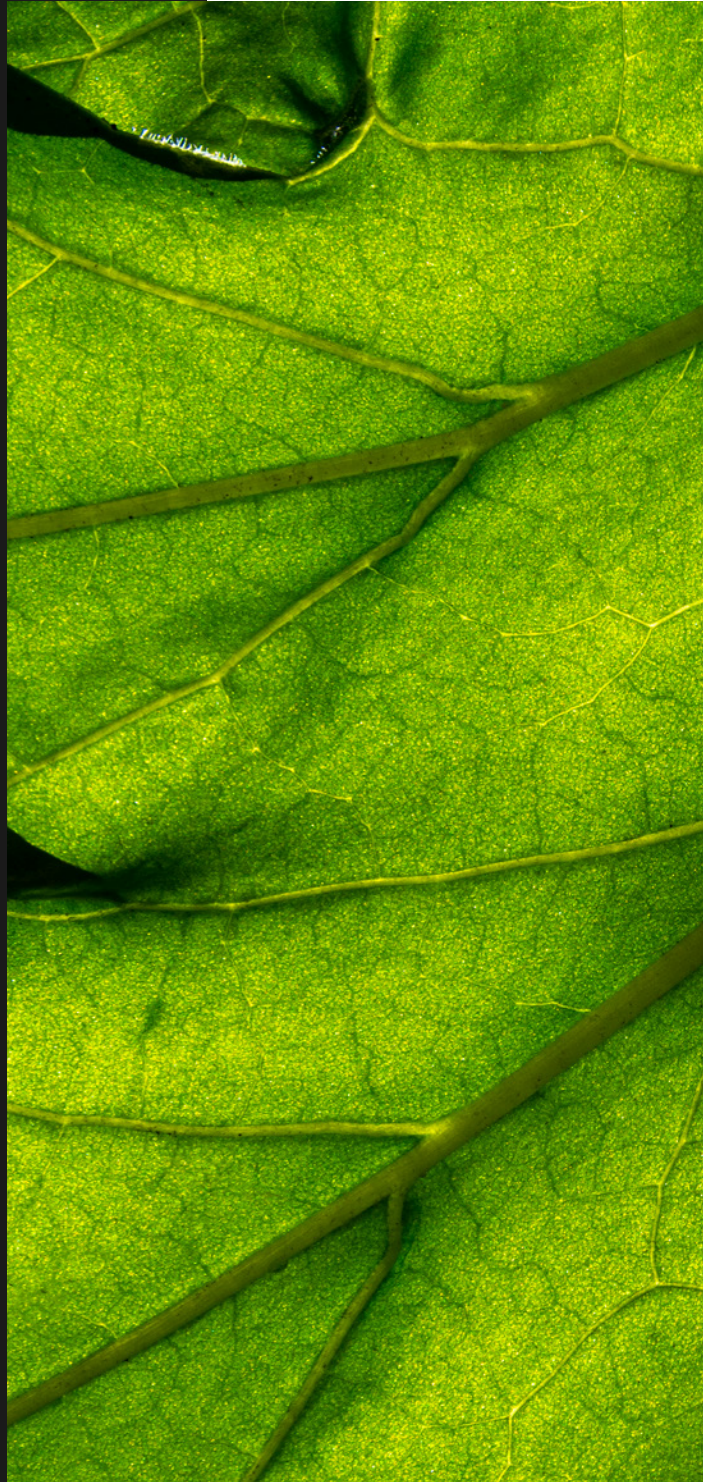
LOOKING AHEAD

We care deeply about the planet, the role climate change is playing in access to education, and our ability to make a difference and reduce our own footprint. In the coming months, we plan to ramp up our efforts to better understand the data on our impact, emphasize sustainability throughout our supply chain, and set targets to keep us accountable towards our goals.



03

Appendix



REPORTING SCOPE AND METHODOLOGY

This report is D2L Inc.'s (TSX:DTOL) inaugural ESG Report. It includes data and information derived from global operations, with offices in Canada, Australia, and co-working space in Canada and the United Kingdom except where otherwise noted. This report has been written with reference to the Global Reporting Initiative (GRI) 2021 and the Sustainability Accounting Standards Board (SASB) Software and IT Services 2018 standard. Our GHG emissions calculations are informed by the GHG Protocol. We mapped our priorities and mission against the United Nations Sustainability Development Goals. Our Content Index is presented in the following pages to map disclosures against GRI and SASB frameworks.

STAKEHOLDER ENGAGEMENT

D2L deeply values the perspectives, needs and concerns of our stakeholders. We know that actively seeking our stakeholders' perspectives will help improve decision-making and increase our likelihood of success in achieving our mission. D2L engages in two-way communications with all of our stakeholders. We take care to use different methods of engagement to suit the needs of different people, accessibility measures and meaningful interaction. We know ongoing and responsive engagement is a crucial element of successful business operations, as helps to create a more inclusive and collaborative environment that benefits everyone involved. The frequency of engagement listed below is an approximation of D2L's engagement through the relevant methods of engagement.

STAKEHOLDER GROUP	METHODS OF ENGAGEMENT	FREQUENCY OF ENGAGEMENT BY TYPE	KEY CONCERNS / PURPOSE FOR ENGAGEMENT
Employees	<ul style="list-style-type: none"> Townhalls Newsletters and periodic updates Intranet Emails Employee Resource Groups Employee surveys 	<ul style="list-style-type: none"> Quarterly Monthly / As needed Updated regularly As needed Monthly meetings Annually 	<ul style="list-style-type: none"> Diversity and inclusion Health, well-being and cost of living Career progression and learning opportunities Company well-being in uncertain economic times Environmental sustainability
Customers	<ul style="list-style-type: none"> Customer meetings Conferences (Annual Fusion event) Newsletters Social media Emails 	<ul style="list-style-type: none"> Regularly / As needed Annually Monthly Weekly As needed 	<ul style="list-style-type: none"> Brightspace and Wave platforms and our services Customer support Data security and data privacy Trust
Partners (including vendors)	<ul style="list-style-type: none"> Partner meetings Annual reports Emails 	<ul style="list-style-type: none"> As needed Annually As needed 	<ul style="list-style-type: none"> Trust and transparency Collaboration

STAKEHOLDER GROUP	METHODS OF ENGAGEMENT	FREQUENCY OF ENGAGEMENT BY TYPE	KEY CONCERNS / PURPOSE FOR ENGAGEMENT
Investors	<ul style="list-style-type: none"> • Investors presentations • Conferences • Quarterly results • Annual Shareholders Meeting • Annual reports • Financial reports • Press releases 	<ul style="list-style-type: none"> • Quarterly • Annually • Quarterly • Annually • Annually • Annually • Quarterly/As needed 	<ul style="list-style-type: none"> • Growth prospects and stability • Good governance • Trust and transparency • Incorporation of ESG
Communities in which we work	<ul style="list-style-type: none"> • Discussions with non-profits and community representatives • Press releases • Social media • Employee volunteerism 	<ul style="list-style-type: none"> • As needed • Quarterly • Weekly • Distributed throughout the year 	<ul style="list-style-type: none"> • Engagement • Support
Governments and regulatory bodies	<ul style="list-style-type: none"> • Engaging with government • Partnerships with industry bodies and associations • Interacting with statutory/regulatory bodies 	<ul style="list-style-type: none"> • Weekly • Monthly • Monthly 	<ul style="list-style-type: none"> • Good governance • Compliance

FORWARD-LOOKING STATEMENTS

This report may include certain "forward-looking information" and "forward-looking statements" (collectively, "forward-looking statements") within the meaning of applicable securities laws ("forward looking statements"). Forward-looking statements are statements that are predictive in nature, depend upon or refer to future events or conditions, and in some cases can be identified by the use of forward-looking words such as "outlook", "budget", "scheduled", "strategy", "occur", "will", "expects", "anticipates", "intends", "plans", "believes", "estimates", or similar expressions concerning matters that are not historical facts. Statements containing forward-looking information represent management's estimates regarding future results.

A number of risks, uncertainties, and other factors may cause actual results to differ materially from the forward-looking statements contained in this report, including, among other factors, those risk factors identified in our most recent Annual Information Form, and in our other filings with the Canadian securities regulatory authorities, which are available under our profile on SEDAR at www.sedar.com. It is the responsibility of the reader to consider these and other factors when making decisions with respect to D2L's subordinate voting shares and not to place undue reliance forward-looking statements. Forward-looking statements contained in this report are not guarantees of future performance. Except as may be expressly required by applicable law, D2L does not undertake any obligation to update publicly or revise any such forward-looking statements, whether as a result of new information, future events, or otherwise.

SASB REFERENCE TABLE

APPLICABLE SASB STANDARD	SOFTWARE & IT SERVICES SUSTAINABILITY ACCOUNTING STANDARD
REPORTING PERIOD	1 FEBRUARY 2022 - 31 JANUARY 2023

TYPE	DESCRIPTION	METRIC	INDICATOR	NOTES
ENVIRONMENTAL FOOTPRINT OF HARDWARE INFRASTRUCTURE	(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable	Gigajoules (GJ), Percentage (%)	TC-SI-130a.1	See p. 48 in the Environment Section. D2L currently undertakes several major initiatives to lighten the use of energy in AWS data centers. All of our electricity is drawn from the grids in which our offices are located.
	(1) Total water withdrawn, (2) total water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress	Thousand cubic meters (m ³), Percentage (%)	TC-SI-130a.2	See p. 49 in the Environment Section. All water withdrawn was consumed. Water data is drawn from our office spaces.
	Discussion of the integration of environmental considerations into strategic planning for data center needs	Discussion	TC-SI-130a.3	See p. 36 in the Service Reliability section.
DATA PRIVACY & FREEDOM OF EXPRESSION	Description of policies and practices relating to behavioral advertising and user privacy	Discussion and Analysis	TC-SI-220a.1	See p. 32, 35 - 36 in the Data Privacy section.
	Number of users whose information is used for secondary purposes.	Number	TC-SI-220a.2	See p. 32 in the Operating with Integrity section. Details on user data can be found in our Privacy Policy on our website.
	Total amount of monetary losses as a result of legal proceedings associated with user privacy	Reporting currency	TC-SI-220a.3	D2L has no reportable monetary losses as a result of legal proceedings of this nature.
	(1) Number of law enforcement requests for user information, (2) number of users whose information was requested, (3) percentage resulting in disclosure	Number, Percentage (%)	TC-SI-220a.4	D2L has no reportable law enforcement requests of this nature. If required, D2L puts state enforcement organizations in touch with the institution in question, directly.
	List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring	Discussion	TC-SI-220a.5	D2L is not monitoring, blocking, content filtering and censoring data by request from any government. We do not, to our knowledge, have clients (an institution's billing entity) based in countries where governments are monitoring, blocking, content filtering and censoring data. Overall, D2L maintains several globally-recognized data security and data privacy certifications and we treat student data very seriously.

TYPE	DESCRIPTION	METRIC	INDICATOR	NOTES			
DATA SECURITY	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of users affected	Number, Percentage (%)	TC-SI-230a.1	D2L has no reportable material security breaches.			
	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	Discussion	TC-SI-230a.2	See p. 33 - 34 in the Data Security section.			
RECRUITING & MANAGING A GLOBAL, DIVERSE & SKILLED WORKFORCE	Percentage of employees that are (1) foreign nationals and (2) located offshore	Percentage	TC-SI-330a.1				
				FY21	FY22	FY23	
				Foreign Nationals	3.99%	4.85%	6.08%
				Located Offshore	1.40%	1.31%	1.58%
	Employee engagement as a percentage	Percentage	TC-SI-330a.2	See p. 41 in the People and Culture section.			
	Percentage of gender and racial/ethnic group representation for (1) management, (2) technical staff, and (3) all other employees Management includes all senior leaders at the Vice President level and above.	Percentage	TC-SI-330a.3	Percentage of gender representation for			
					FY21	FY22	FY23
				Management	W - 23% M - 77%	W - 23% M - 77%	W - 25% M - 75%
				Technical	W - 22% M - 78%	W - 24% M - 76%	W - 25% M - 75%
				Other	W - 50% M - 50%	W - 53% M - 47%	W - 55% M - 45%
Percentage of racial / ethnic representation for							
				FY21	FY22	FY23	
Management	N/A	N/A	Identifying - 14% Non-Identifying - 86%				
Technical			Identifying - 31% Non-Identifying - 69%				
Other			Identifying - 26% Non-Identifying - 74%				
INTELLECTUAL PROPERTY PROTECTION & COMPETITIVE BEHAVIOR	Total amount of monetary losses as a result of legal proceedings associated with anticompetitive behavior regulations	Reporting currency	TC-SI-520a.1	D2L has no reportable monetary losses as a result of legal proceedings associated with anticompetitive behavior regulations. See Intellectual Property and Innovation section.			

TYPE	DESCRIPTION	METRIC	INDICATOR	NOTES
MANAGING SYSTEMIC RISKS FROM TECHNOLOGY DISRUPTIONS	Number of (1) performance issues and (2) service disruptions; (3) total customer downtime	Number, Days	TC-SI-550a.1	See p. 37 in the Service Reliability section. Information on our service is accessible to the public through https://status.d2l.com/
	Description of business continuity risks related to disruptions of operations.	Discussion	TC-SI-550a.2	See p. 36 in the Service Reliability section and p. 41 of the AIF.
ACTIVITY METRICS	(1) Number of licenses or subscriptions, (2) percentage cloud-based	Number, Percentage (%)	TC-SI-000.A	D2L currently has over 1240 customers (institutions using D2L products) in over 40 countries. All clients are cloud-based.
	(1) Data processing capacity, (2) percentage outsourced ¹⁰	See note	TC-SI-000.B	Details on data processing can be found in our Privacy Policy , on our website.
	(1) Amount of data storage, (2) percentage outsourced	Petabytes, Percentage	TC-SI-000.C	100% of our data storage is outsourced to AWS. The amount of data storage is confidential for business competitiveness reasons.

GRI Content Index

STATEMENT OF USE	D2L Inc. has reported the information cited in this GRI content index for the period 1 February 2022 - 31 January 2023 with reference to the GRI Standards.	
GRI 1 USED	GRI 1: Foundation 2021	
GRI STANDARD	DISCLOSURE	LOCATION
GRI 2: GENERAL DISCLOSURES 2021	2-1 Organizational details	See p. 7 in the About D2L section. For specific countries of operation, please see the Annual Report.
	2-2 Entities included in the organization's sustainability reporting	All the entities included in D2L's financial reporting are also included in our sustainability reporting. A full list of entities included in this reporting can be found in the AIF.
	2-3 Reporting period, frequency and contact point	This report is published annually, aligned with our financial reporting period. For contact information, see p. 63 (last page of this report).
	2-4 Restatements of information	Not applicable. This is D2L's first ESG report.
	2-5 External assurance	No external assurance has been obtained. Our Board of Directors and Senior Leadership Team review ESG Reporting prior to publication.
	2-6 Activities, value chain and other business relationships	AIF p. 9 - 24

GRI STANDARD	DISCLOSURE	LOCATION		
		FY21	FY22	FY23
GRI 2: GENERAL DISCLOSURES 2021	2-7 Employees	Type of employment Permanent (Full-time): 94% Permanent (Part-Time): 2% Temporary (Full-Time): 1% Temporary (Part-Time): 2% Student (salaried): 0.2% Casual (Hours): 0.6%	Permanent: 96% Permanent: 1.5% Temporary: 1.1% Temporary: 0.2% Student: 1.2% Casual: 0.3%	Permanent: 95% Permanent: 1.3% Temporary: 1.7% Temporary: 0.2% Student: 1.4% Casual: 0.3%
		Gender W - 38% M - 62%	W - 41% M - 59%	W - 44% M - 56%
	2-9 Governance structure and composition	See p. 13 - 14 in the Governance Section, and AIF p. 71 - 75		
	2-10 Nomination and selection of the highest governance body	See our MIC for more details.		
	2-11 Chair of the highest governance body	See p. 12 in the Governance section, and AIF p. 71 - 73.		
	2-12 Role of the highest governance body in overseeing the management of impacts	See p. 12 - 15 in the Governance section, and our MIC for more details.		
	2-13 Delegation of responsibility for managing impacts	See p. 11 in the Governance section.		
	2-14 Role of the highest governance body in sustainability reporting	See p. 13 in the Governance section.		
	2-15 Conflicts of interest	AIF p. 77 and p. 96		
	2-16 Communication of critical concerns	AIF p. 82 - 83		
	2-17 Collective knowledge of the highest governance body	See p. 13 in the Governance section, and our MIC for more details.		
	2-18 Evaluation of the performance of the highest governance body	See our MIC for details.		
	2-19 Remuneration policies	See our MIC for details.		
2-22 Statement on sustainable development strategy	See p. 3 - 4 for our CEO Letter.			

GRI STANDARD	DISCLOSURE	LOCATION								
GRI 2: GENERAL DISCLOSURES 2021	2-23 Policy commitments	See p. 13 in the Governance section and p. 19 - 20 in the Materiality Matrix section.								
	2-24 Embedding policy commitments	See p. 16 in the Governance section.								
	2-25 Processes to remediate negative impacts	Our mechanism for grievances and raising concerns is through our Whistleblower Policy.								
	2-26 Mechanisms for seeking advice and raising concerns	Our mechanism for grievances and raising concerns is through our Whistleblower Policy.								
	2-27 Compliance with laws and regulations	D2L takes care to abide by all laws in all jurisdictions in which we operate. D2L is not aware of any instances of non-compliance with laws and regulations during the reporting period and has paid no associated fines.								
	2-28 Membership associations	AIF p. 73								
	2-29 Approach to stakeholder engagement	See p. 53 - 54 'Stakeholder Engagement'.								
GRI 3: MATERIAL TOPICS 2021	2-30 Collective bargaining agreements	Only D2L employees in Brazil are under a collective bargaining agreement. D2L relies on market research produced internally and with the support of external consultants to determine compensation and benefits packages. We endeavour to treat all employees equitably.								
	3-1 Process to determine material topics	See p. 19 - 20 'Materiality Matrix'.								
	3-2 List of material topics	See p. 19 - 20 'Materiality Matrix'.								
GRI 201: ECONOMIC PERFORMANCE 2016	3-3 Management of material topics	See p. 19 - 20 'Materiality Matrix'.								
	201-1 Direct economic value generated and distributed	See p. 9 'Fiscal Year 2023 Highlights' and annual financial statements.								
	201-2 Financial implications and other risks and opportunities due to climate change	AIF p. 56 and p. 63								
	201-3 Defined benefit plan obligations and other retirement plans	See our annual financial statements. <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th colspan="3" style="background-color: #2c3e50; color: white;">Percentage of total workforce enrolled in retirement contribution plans below. Retirement plans exist only in Canada, US, and UK. Only regular full-time employees can participate.</th> </tr> <tr> <th style="background-color: #2c3e50; color: white;">FY21</th> <th style="background-color: #2c3e50; color: white;">FY22</th> <th style="background-color: #2c3e50; color: white;">FY23</th> </tr> <tr> <td style="text-align: center;">72%</td> <td style="text-align: center;">71%</td> <td style="text-align: center;">75%</td> </tr> </table>	Percentage of total workforce enrolled in retirement contribution plans below. Retirement plans exist only in Canada, US, and UK. Only regular full-time employees can participate.			FY21	FY22	FY23	72%	71%
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FY21	FY22	FY23								
72%	71%	75%								
201-4 Financial assistance received from government	As of January 31, 2023, to our knowledge, no government holds shares of D2L Inc. See our annual financial statements.									
GRI 204: PROCUREMENT PRACTICES 2016	204-1 Proportion of spending on local suppliers	D2L is currently working towards formalizing our procurement processes. When possible, we aim to prioritize local suppliers.								

GRI STANDARD	DISCLOSURE	LOCATION
GRI 205: ANTI-CORRUPTION 2016	205-1 Operations assessed for risks related to corruption	AIF p. 49 - 50
	205-2 Communication and training about anti-corruption policies and procedures	See p. 16 in the Governance section.. All employees that have received training on anti- corruption.
	205-3 Confirmed incidents of corruption and actions taken	D2L has had no reportable incidences of corruption.
GRI 206: ANTI-COMPETITIVE BEHAVIOR 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	See p. 38 in the Intellectual Property section. D2L has faced no reportable legal actions for anti-competitive behavior, anti-trust, and monopoly practices.
GRI 207: TAX 2019	207-1 Approach to tax	D2L maintains a tax strategy which is reviewed annually by senior leadership. This strategy is considered competitive information.
	207-2 Tax governance, control, and risk management	D2L's tax strategy is overseen by our Chief Financial Officer. D2L maintains a team of tax managers, controllers, and external advisory providers. Tax risks are managed within the tax team and with senior leadership, as required. D2L relies on certificates of good standing and frequent audits, successful audit outcomes, and reduced tax bureaucracy to assist in evaluation and control.
	207-3 Stakeholder engagement and management of concerns related to tax	D2L manages all communication with tax authorities directly.
	207-4 Country-by-country reporting	All tax jurisdictions where the entities included in D2L's audited consolidated financial statements, or in the financial information filed on public record, are resident for tax purposes include: Canada, USA, Singapore, UK, South Africa, Netherlands, Brazil, Australia. For more information, please see our publicly filed financial documents.
GRI 302: ENERGY 2016	302-1 Energy consumption within the organization	See p. 49 in the Environment section.
	302-3 Energy intensity	See p. 48 in the Environment section.
GRI 305: EMISSIONS 2016	305-1 Direct (Scope 1) GHG emissions	See p. 49 in the Environment section.
	305-2 Energy indirect (Scope 2) GHG emissions	See p. 49 in the Environment section.
	305-3 Other indirect (Scope 3) GHG emissions	See p. 49 in the Environment section.

GRI STANDARD	DISCLOSURE	LOCATION																				
GRI 308: SUPPLIER ENVIRONMENTAL ASSESSMENT 2016	308-1 New suppliers that were screened using environmental criteria	See p. 50 in the Environment section.																				
GRI 401: EMPLOYMENT 2016	401-1 New employee hires and employee turnover	See People and Culture section																				
		New Employee Hires																				
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GRI 401: EMPLOYMENT 2016	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	See p. 41 in the Empowering our People section.																				
	401-3 Parental leave	All D2L employees are entitled to parental leave. Note: Data below reflects employees who left on parental leave during the fiscal year. In some instances, employees extended their leave. In these cases, individual employees are counted only in the year in which they took leave.																				
GRI 403: OCCUPATIONAL HEALTH AND SAFETY 2018	403-1 Occupational health and safety management system	See p. 47 in the Empowering our People section.																				
	403-6 Promotion of worker health	See p. 41 in the Empowering our People section.																				

GRI STANDARD	DISCLOSURE	LOCATION																									
GRI 404: TRAINING AND EDUCATION 2016	404-1 Average hours of training per year per employee	See p. 42 in the Empowering our People section.																									
	404-2 Programs for upgrading employee skills and transition assistance programs	See p. 42 in the Empowering our People section.																									
	404-3 Percentage of employees receiving regular performance and career development reviews	See p. 42 in the Empowering our People section.																									
GRI 405: DIVERSITY AND EQUAL OPPORTUNITY 2016	405-1 Diversity of governance bodies and employees	See p. 44, 46 in the Empowering our People section and p. 12 in the Governance section.																									
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GRI 406: NON-DISCRIMINATION 2016	406-1 Incidents of discrimination and corrective actions taken	See p. 45 in the Empowering our People section.																									
GRI 413: LOCAL COMMUNITIES 2016	413-1 Operations with local community engagement, impact assessments, and development programs	See p. 26 - 31 in the Transforming the way the World Learns section.																									
GRI 414: SUPPLIER SOCIAL ASSESSMENT 2016	414-1 New suppliers that were screened using social criteria	See p. 50 in the Environment section.																									
GRI 415: PUBLIC POLICY 2016	415-1 Political contributions	No financial and in-kind political contributions were made directly and indirectly by D2L Inc.																									
GRI 418: CUSTOMER PRIVACY 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	D2L has not received any reportable substantiated complaints from outside parties or regulatory bodies.																									



Contact Us

For questions on this report, please contact:

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Media Relations: PR@D2L.com

Investor Relations: IR@D2L.com