

D2L

Sustainability Report FY24

February 1, 2023–January 31, 2024



Table of Contents

CEO LETTER	3
ABOUT D2L: OUR MISSION AND VISION	5
What We Do	6
Where We Work	10
Our Highlights from FY24	11
GOVERNANCE	14
Corporate Governance Highlights	15
Board Composition and Diversity	16
ESG Risk Management and Oversight	17
Our ESG Governance Structure	18
SUSTAINABILITY AT D2L	21
Our Materiality Assessment	23
D2L Sustainability Strategy	25
How our Sustainability Strategy Maps to the UN SDGs	27
TRANSFORMING THE WAY THE WORLD LEARNS	29
D2L Social Impact Metrics	30
Partnering with our Customers to Transform Learning	31
Building Technology that Makes a Difference	33
Giving Back to Our Community	38
OPERATING WITH INTEGRITY	42
Responsible Use of Artificial intelligence	44
Data Security	48
Data Privacy	51
Service Reliability	52
Intellectual Property and Innovation	53
EMPOWERING OUR PEOPLE	55
People and Culture	56
Diversity, Equity, Inclusion, and Belonging (DEIB)	61
PROTECTING THE ENVIRONMENT	64
Monitoring our Environmental Impact	66
Engaging Employees	68
APPENDIX	69

CEO Letter

At D2L, our mission is to help transform the way the world learns by developing technology that helps make learning more accessible, engaging and inspiring at all stages of life. Through my travels around the world and conversations I've had with leaders across all industries, I've found that it's clear that the role of education is the cornerstone of human progress, especially as we face a future impacted by digital disruption, climate change and continued global social unrest. Technology-driven learning, whether in traditional classrooms or online platforms, holds immense potential to support the outcomes described in the [UN's Sustainability Development Goals \(SDGs\)](#) by enhancing educational experiences, broadening access to quality learning and promoting lifelong learning opportunities universally.

Last year, we launched our formal sustainability work to share what we do at D2L to contribute not only to economic development but also to the broader societal goals enshrined in the UN SDGs. In FY24, we worked across the company to develop our first Sustainability Strategy and identify key metrics related to our material environmental, social and governance (ESG) issues, and we're proud to be publishing our first Task Force on Climate-Related Financial Disclosures (TCFD)-aligned report this year.

Since launching the last sustainability report, D2L has continued to build on our sustainability work with a clear strategy to be more impactful and effective toward the communities we serve and the world around us. I'm proud of the various ways that we have continued to build D2L in FY24.

TRANSFORMING THE WAY THE WORLD LEARNS

In response to evolving educational needs, we prioritize providing best-in-class technology and services to support learning objectives and to expand educational opportunities for our customers. Our innovations reinforce our commitment to empowering customers and the broader learning ecosystem. The growing importance of upskilling in the workforce is also expanding quickly. In FY24, we introduced D2L for Business to meet the corporate market's growing need for talent development amid rapid job transformations.

Beyond our global customer base, we are dedicated to community impact, particularly in areas where access to education is limited. In line with our commitment to social responsibility, we've partnered with Open Society University Network (OSUN) to aid refugees in Kenya and partnered with Blackberry to allocate funding to Actua, facilitating science, technology, engineering, and mathematics (STEM) programming for Indigenous youth and girls nationwide in Canada.

OPERATING WITH INTEGRITY

When building learning solutions, we prioritize data security and privacy and the responsible development and use of artificial intelligence (AI). Now more than ever, we are taking a proactive approach to innovation, we have integrated security measures from the outset and participate in initiatives like those of the U.S. federal government that enhance cybersecurity awareness and facilitate the exchange of best practices. D2L underscores responsible innovation, especially regarding AI, [by advocating for the ethical and mindful development and utilization of AI](#) and keeping humans in the loop. We recognize its transformative potential in education, and we are keeping it focused on where it can enable real impact for our customers. We continue to build on our extensive portfolio of data security and data privacy certifications with ISO 27701 and full certification under Texas Risk and Authorization Management Program (TX-RAMP) in FY24.



EMPOWERING OUR PEOPLE

At D2L, we prioritize finding the most talented people to join our mission and providing them with a diverse, inclusive and equitable workplace in which to drive innovation and organizational success. Our commitment extends to fostering a culture where every employee feels valued and empowered to contribute authentically, boosting morale and productivity. We uphold meritocracy and talent recognition, evaluating individuals based on their skills and contributions to ensure fairness and transparency. Last year, we enhanced transparency in compensation for employees, aiming to improve satisfaction and retention. Additionally, we introduced a new employee resource group: Women in Action, a group dedicated to continuing to elevate the voices of women and nonbinary folks across the organization, furthering our dedication to inclusivity and support for all employees.

PROTECTING THE ENVIRONMENT

Education plays a pivotal role in protecting the health of the planet, and D2L acknowledges its responsibility in this regard. Taking responsibility means developing the data systems to understand our impacts, educating our employees to start to shift, and implementing initiatives across the company. In this regard, we conducted a comprehensive greenhouse gas (GHG) inventory this year, organized multiple enablement sessions for employees and drove initiatives like those led by our Global Events team to start acting on areas where we can most effectively manage our operations for positive change. D2L is committed to ongoing measurement, assessment and implementation of environmental initiatives for continual progress.

Transformation is an arduous journey, requiring foresight, evaluation and adaptability. At D2L, we have over 25 years of dedicated service, and we understand the profound dedication and creativity required to make meaningful changes in learning. We share the vision outlined in the UN SDGs for sustainable development, demonstrated by our steadfast commitment to reshaping global learning. This has been the cornerstone of our journey for the past 25 years and will continue to propel us forward into the future.



John Baker, founder and CEO

01

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.

About D2L: Our Mission and Vision

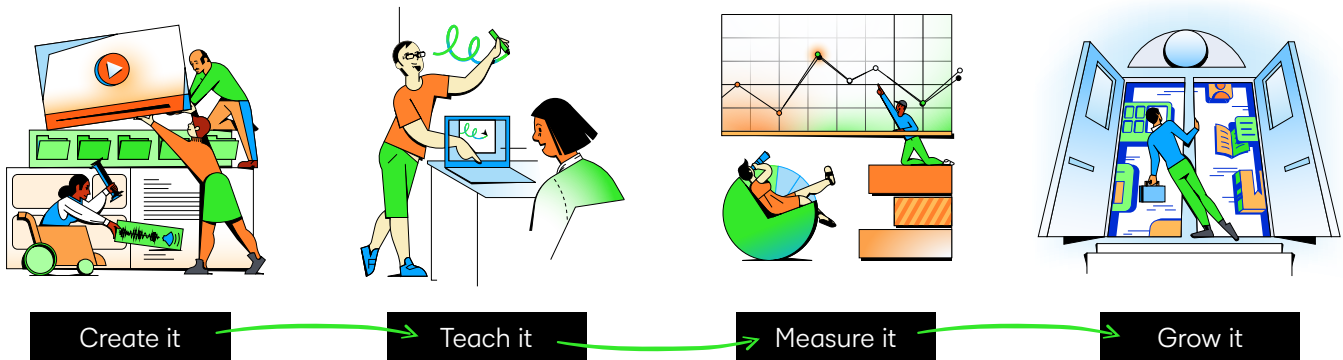
D2L is a mission-driven company dedicated to transforming the way the world learns. We believe that everyone deserves access to high-quality education and training, regardless of age, ability, or location. Every day we work in partnership with our customers all over the world to support millions of people learning online and in person.

We are focused on creating unique, learner-centric platforms to personalize learning at scale. Our products are informed by learning science, supported by 25 years of expertise, and driven by a vision for a better world where learning is more accessible, engaging and inspiring.

Fiscal year 2024 (FY24) (February 1, 2023–January 31, 2024) marked our 25th year transforming the way the world learns. D2L was founded in Kitchener, Canada, in 1999. The company, D2L Inc. (TSX: “DTOL”), went public on the Toronto Stock Exchange in November 2021.

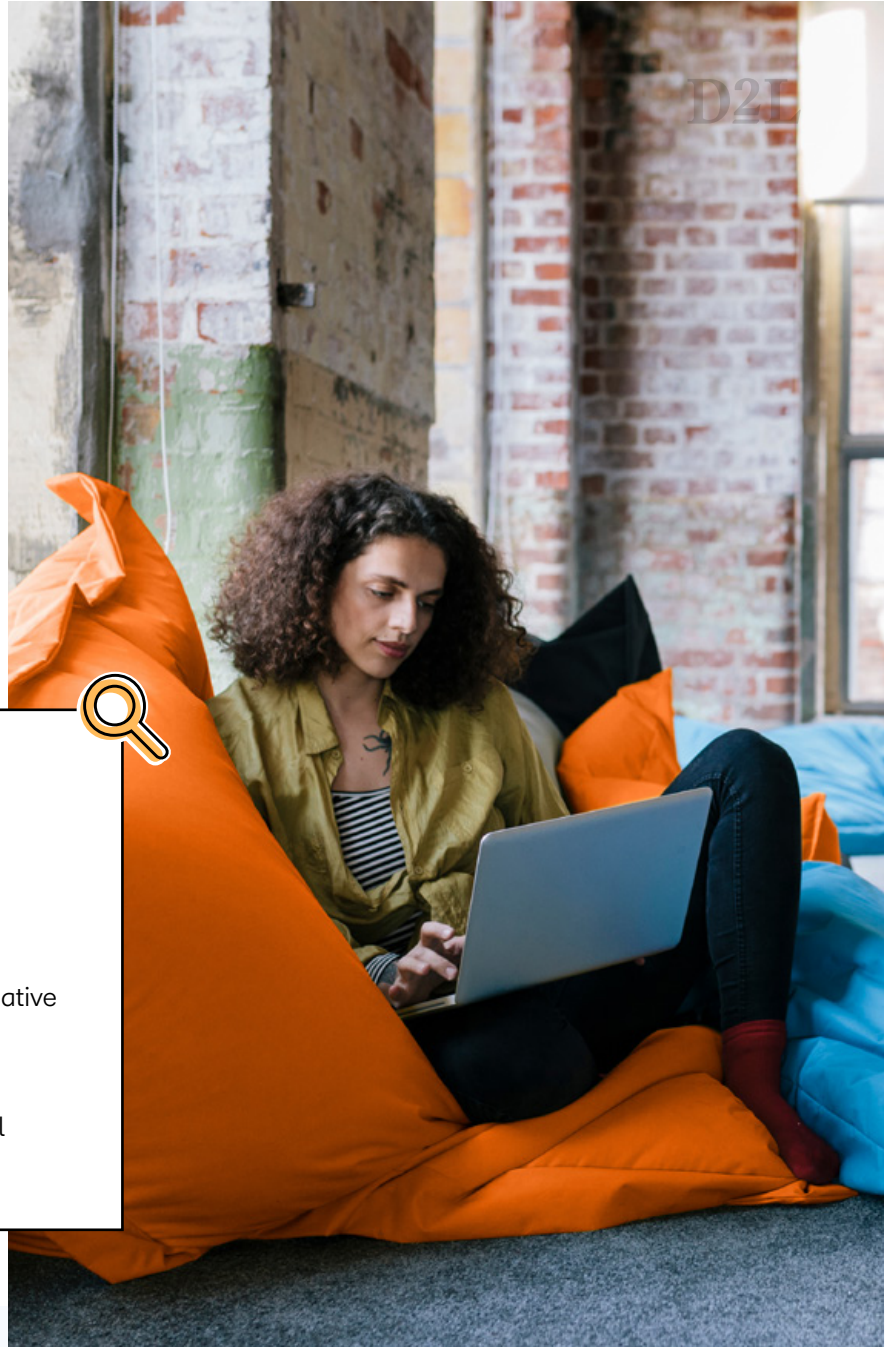
What We Do

D2L’s focus is on creating the learning moment. We provide our customers with the tools to create highly impactful learning experiences across K-12, higher education and workforce development.



D2L PROVIDES SCALABLE AND FLEXIBLE SOLUTIONS FOR WORLD-CLASS LEARNING EXPERIENCES

D2L Brightspace is a scalable and flexible cloud-based software platform that gives customers the ability to create engaging and personalized learning experiences that can reach every learner, both online and in-person. Its flexibility supports a variety of learning models and materials and serves as a connected, integrated learning experience.



THE BRIGHTSPACE PLATFORM:

- is easy and efficient to use
- is designed with accessibility top of mind
- is mobile for anytime, anywhere learning
- enables teachers and instructors to deliver creative and engaging content
- allows personalization to meet the needs of different users, including faculty, learners of all ages, corporate leaders, etc.



HIGHLIGHTED BRIGHTSPACE PRODUCTS

Creator+ (C+)

eLearning Authoring Tool supports instructors in developing dynamic course experiences within D2L Brightspace, with ready-made content templates, easy-to-use interactive elements, screen captures, and practice exercises.

Performance+ (P+)

Learning Analytics Dashboard provides customers with advanced analytics expanding native reporting abilities with predictive analytics, additional report visualizations and an adaptive learning engine that adjusts learning pathways in real time based on learner achievement.

Course Merchant

Through Course Merchant, institutions can reach more learners with a built-in storefront experience so anyone, anywhere, can seamlessly discover, browse, purchase and self-enroll in course offerings.

From classroom to lifelong learning, D2L's products are designed to offer learning experiences for a variety of learners.

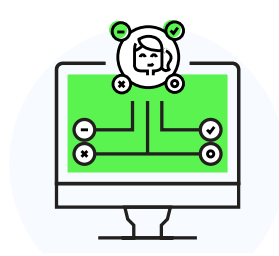
D2L FOR BUSINESS: AI-ENABLED AND SKILLS-DRIVEN CORPORATE LEARNING SOLUTION

D2L for Business (D4B) is a learning solution that delivers a unified and user-friendly experience built to maximize results and return on investment for employers. We do this through a seamless integration of content, technology, and services. D4B allows:



SKILL MAPPING AND PATHWAYS

Businesses can harness our industry experts and AI-driven technology to map skills to careers, determine clear paths for upskilling and develop custom action plans to fill talent pipelines for highly strategic skills and careers.



UPSKILLING PLATFORM

Employees can access learning and development opportunities that align with organizational goals and have streamlined approval and reimbursement processes. They'll choose from a curated catalog of courses and programs from top-tier universities, colleges and training organizations that focus on building in-demand skills.



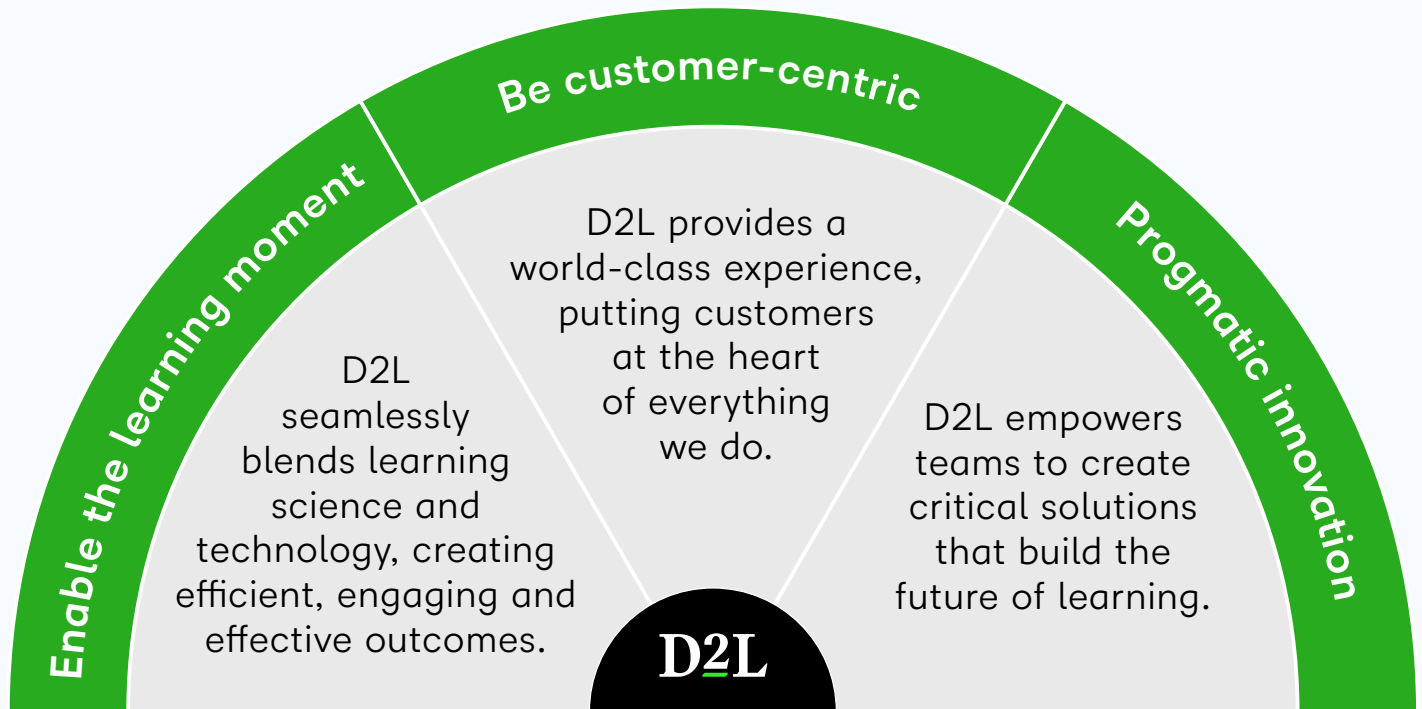
LEARNING EXPERIENCE PLATFORM (LXP)

Employers can craft and deliver tailored learning content easily with AI-powered authoring tools—no coding skills or design expertise needed. Our large library of templates and ready-made themes make designing and delivering onboarding, compliance and upskilling programs easy and seamless for corporations.

D2L SERVICE OFFERINGS

To help our customers realize the return on investment they expect from their relationship with D2L, we offer a host of services including:

- onboarding services and change management support
- customer support services
- learning services that assist in the design of engaging and effective learning experiences
- optimization services



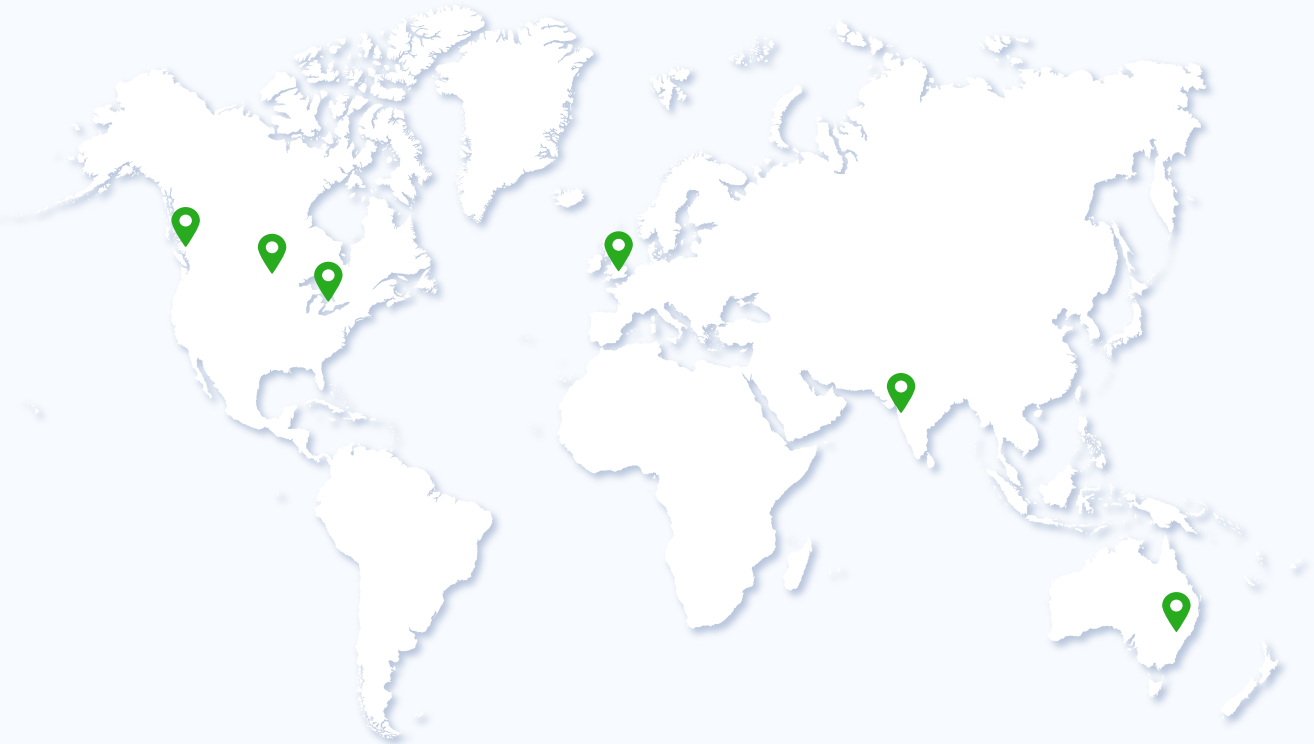
At D2L, we are proud to serve our customers with solutions that fit learners at all stages of life, with award-winning service and a true passion for what we do.

This report outlines the ways in which we drive impact, both through the work we do every day and in partnership with our customers.

Where We Work

Our headquarters are located in Kitchener, Ontario, Canada, and we have offices in:

- Winnipeg, Manitoba
- Vancouver, British Columbia
- Melbourne, Australia
- Toronto, Ontario
- London, UK



D2L'S EXPANSION TO INDIA

We are thrilled to have broadened our reach to India in FY24. With this expansion, we are committed to supporting increased access to education as well as new partnerships and job opportunities in the region as we grow.

D2L Brightspace complies with the requirements for learning platforms set by the University Grants Commission and National Education Policy. D2L has more than 40 customers in India today and is committed to empowering the country's learners, talented educators and top companies with better learning experiences that are mobile-friendly, personal and highly accessible.

Our Highlights From Fiscal Year 2024

Recognition and top awards



The work of our talented team members led to three Gold Brandon Hall awards

Best Learning Management System (LMS)
Best Unique or Innovative Leadership Program
Best Unique or Innovative Learning and Development Program



D2L was once again recognized by CODiE industry experts as a leader in our industry

Among several nominations in the Business Technology and Education Technology categories, D2L was a finalist in:
Best Professional Learning Solution for Educators
Best Customer Education LMS



And we were once again recognized by prestigious organizations in Canada for our culture and people management

Forbes Canada's Best Employers List (Gold)
Canada's Best Diversity Employers
Canada's Most Admired Corporate Cultures
Canada's Best Managed Companies, Platinum Member



Over 18 million users supported globally

Served over 1,300 customers in over 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 FY24, we continued to grow our customer base through building new partnerships globally and expanding our reach to India and Mexico.

We are thrilled to share that D2L Brightspace has passed our nearest competitor to have the **second-largest market share when scaled by enrollment in market history**.¹



Continued developing sustainability at D2L

We are continuing to build our sustainability work.

Focus areas in FY24 include achieving senior management-level approval of our sustainability strategy, completing our first comprehensive GHG inventory, and publishing a preliminary TCFD-aligned report.



We openly report conformance to the highest levels of accessibility standards and regulations

In FY24, D2L reported against the compliance requirements of the **Web Content Accessibility Guidelines (WCAG) 2.2 Level AAA standards**. We continue to comply with regulations such as **Section 508 of the Rehabilitation Act, 1973** and the **European Accessibility Act** (Directive 2019/882).



Generated \$182.4M of revenue and employed more than 1,000 people in FY24

¹ Mindwires, Higher Education LMS Market Dynamics Year-End 2023 Report



Embarked on the responsible use of AI to empower administrators, instructors, and learners

The world took a massive step forward in technological development this year with the public accessibility of AI technology. This technology offers several opportunities to enhance the experiences of our users, and to help guide our developments responsibly, we published the

- D2L Responsible AI Principles
- D2L AI Policy
- D2L AI Acceptable Use Policy

We are streamlining workflows for educators while maintaining human control and oversight. Our **generative AI (GenAI) beta program** is an example of this and aims to help educators and content creators easily and quickly generate practice questions and quiz questions using existing course content. Generated questions can be reviewed and edited prior to being shared with learners. This pilot aims to reduce administrative workloads and encourage a greater focus on learner engagement.



Demonstrated strong leadership in security/privacy protection

Upheld at least 99.95% uptime for our users

In FY24 we added ISO 27701 and full certification of TX-RAMP to our portfolio of data security certifications. We continue to hold ISO 27001, ISO 27017, ISO 27018, SOC 1 TYPE 2, and SOC 2 TYPE 2 certifications directly.



Pledged and contributed in-kind and financial support to reduce barriers for vulnerable learners

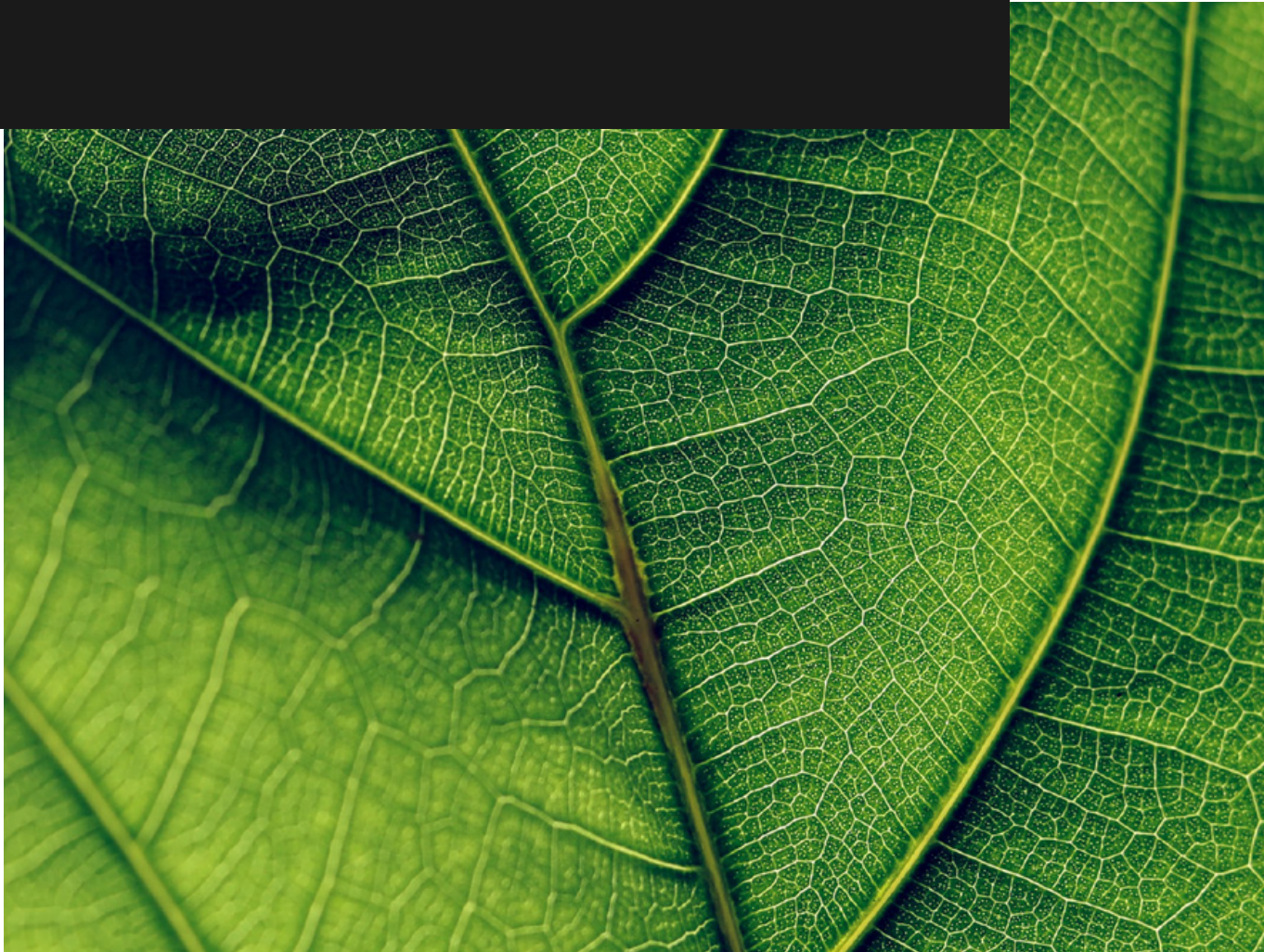
Transforming the way the world learns also means supporting communities that may or may not have access to our products and services.

In December, we built on the work we do to strengthen global education systems by partnering with OSUN to pledge support for refugees in the Dadaab refugee camp in Kenya.

We continue to support access to science, technology, engineering, and mathematics (STEM) education and demonstrated our commitment through our partnership with Blackberry (BB.TO) to support Actua's programming in STEM education for Indigenous youth.

02

Governance



Governance

Strong corporate governance is integral for effective management of our business in an ethical, responsible, and transparent manner and to protect 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



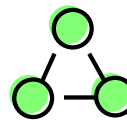
More than **30%** of our independent directors identify as women.



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



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



Our board has three established committees: the Audit Committee, the CGN Committee and the Compensation Committee.



All board committees are made up of independent directors.



D2L maintains formal, board approved, policies which provide measures for accountability and promote decision making in the best interests of D2L, such as the Code of Business Conduct and Ethics, Clawback Policy, Disclosure Policy, Insider Trading Policy, Enterprise Risk Management Policy and Whistleblower Policy and Process



ESG oversight falls under the Corporate Governance and Nominating (CGN) Committee and all levels of leadership in the business are involved in ESG.

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 or our investor relations website at <https://ir.D2L.com/overview/default.aspx>.

Board Composition and Diversity

Our Board is led by the Chair of the Board, John Baker, D2L’s founder and CEO, 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/ Nonexecutive 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		✓	✓	✓	✓		

 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 multistep 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 that is integrated into every aspect of our organization and through training and learning opportunities.

D2L's board and 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, and 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 employees on sustainable development, including information sessions given by D2L internal experts. In September 2023, our sustainability team ran a climate education session with the board to deepen members' understanding of the International Sustainability Standards Board specifications and the importance of climate risk mitigation.



1

BOARD OF DIRECTORS

CORPORATE GOVERNANCE AND NOMINATING COMMITTEE

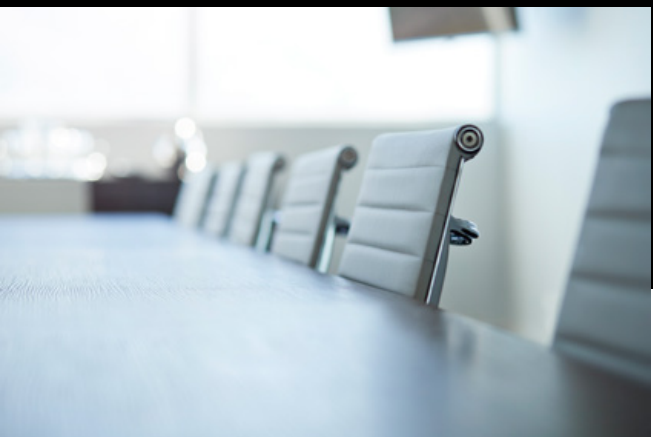
Our CGN Committee oversees the ESG program at D2L and is responsible for supporting the board on matters such as the evaluation of the effectiveness, competencies and skills of directors; board recruitment; and periodic review of D2L's governance-related policies and procedures such as our Disclosure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

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 for 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 that 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 of the ESG Steering Committee is our CSO.

5

SUSTAINABILITY MANAGER

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

6

D2L SUSTAINABILITY AMBASSADORS

D2L Sustainability Ambassadors is an employee-level group that 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). D2L has a formal ERM process, through which we identify key risks affecting the business. Executive level risk owners were identified to manage risk plans. Principal risks are reported at least 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. In Fiscal Year 2025 (FY25) (February 1, 2024–January 31, 2025), we aim to assess and potentially expand on the ESG and climate-related topics in our ERM process as necessary.

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.

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 upon in 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, as well as 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 by:



Maintaining policies and commitments against slavery and forced labor, as demonstrated by our **Statement on Modern Slavery and Human Trafficking** and policy



Conducting annual modern slavery due diligence of all UK and Australian vendors in our supply chain



Promoting supplier responsibility through our Supplier Diversity Policy to promote procurement from businesses owned by individuals identifying as women, minorities or disabled veterans



Communicating with our supply chain actors on the importance of sustainability issues and the expectations we hold our suppliers to be thinking about and working to lower their own impacts

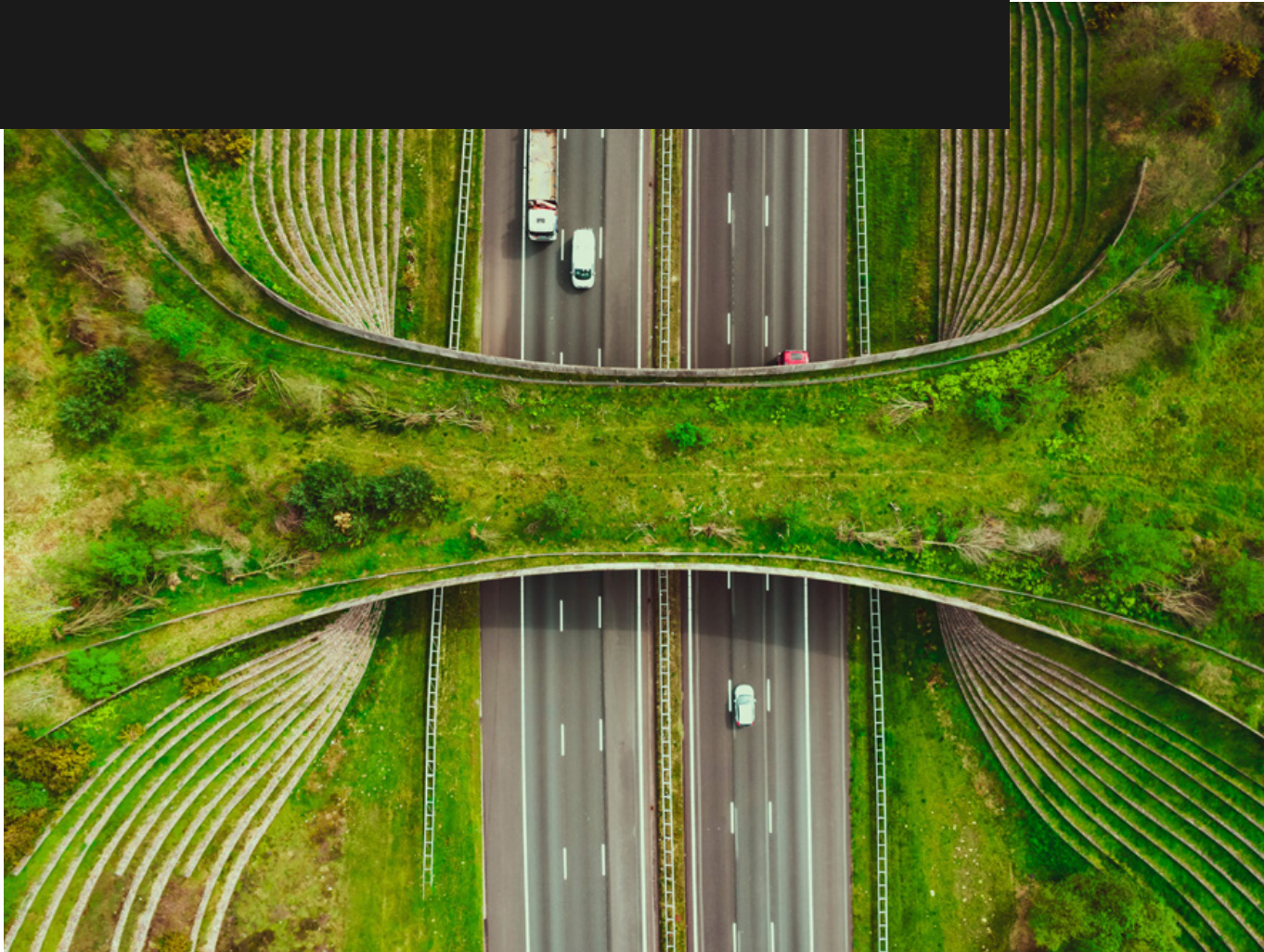
In FY24, we expanded the **D2L Service Delivery Partner Program** aimed at building our network of professional services subcontractors to businesses run by members of underrepresented communities. We launched a web form aimed at attracting new businesses into our network and facilitating the process of doing business with D2L.

- For Canadian businesses, this means that 51% is owned and controlled in Canada by a permanent resident or citizen who is at least one of the following: woman, minority, Indigenous, LGBTQ+ person, person with a disability or veteran.
- For U.S.-based businesses, this includes certified Minority-Owned Business Enterprises (MBEs), Women-Owned Business Enterprises (WBEs) and/or Veteran-Owned Business Enterprises (VBEs).



03

Sustainability at D2L





Sustainability at D2L

How we think about making a positive impact and the foundations of D2L's sustainability efforts revolve around our company *mission and vision*.

D2L was founded with the mission to *transform the way the world learns* toward a vision for *a better world where learning is more accessible, engaging and inspiring*. This mission and vision are woven through the fabric of D2L and guide all aspects of our business. To that end, we take a holistic approach to sustainability.

We continue to evolve our understanding of sustainability-related and climate-related risks to our business as the world transforms approaches to corporate sustainability. In FY24, we identified several potential climate-related risks that our company may face as climate change continues. These are outlined in our TCFD-aligned disclosures.

In addition, as a learning company, we know that education is one of the best tools to help future generations mitigate the impacts of climate change,² and this presents opportunities through our platforms and products to support our users all over the world.

We use our material ESGs topics to guide our approach toward sustainability at D2L. In FY24, we built on our materiality assessment by categorizing these issues into our first Sustainability Strategy and related our material ESG issues back to the broader scope of sustainability outlined in the UN SDGs. Our strategy is outlined below.

² Hawken, P. (2017). *Drawdown: The Most Comprehensive Plan Ever Proposed to Reverse Global Warming*. Penguin Books.

Our Materiality Assessment

While D2L works throughout the year to invest in the issues important to our business and our stakeholders, Fiscal Year 2023 (FY23) (February 1, 2022 - January 31, 2023) we conducted our first ESG materiality assessment to confirm which issues our stakeholders prioritize and which ESG issues have the biggest impact on our business. We intend to review our materiality every two years.

Identifying our material ESG topics 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

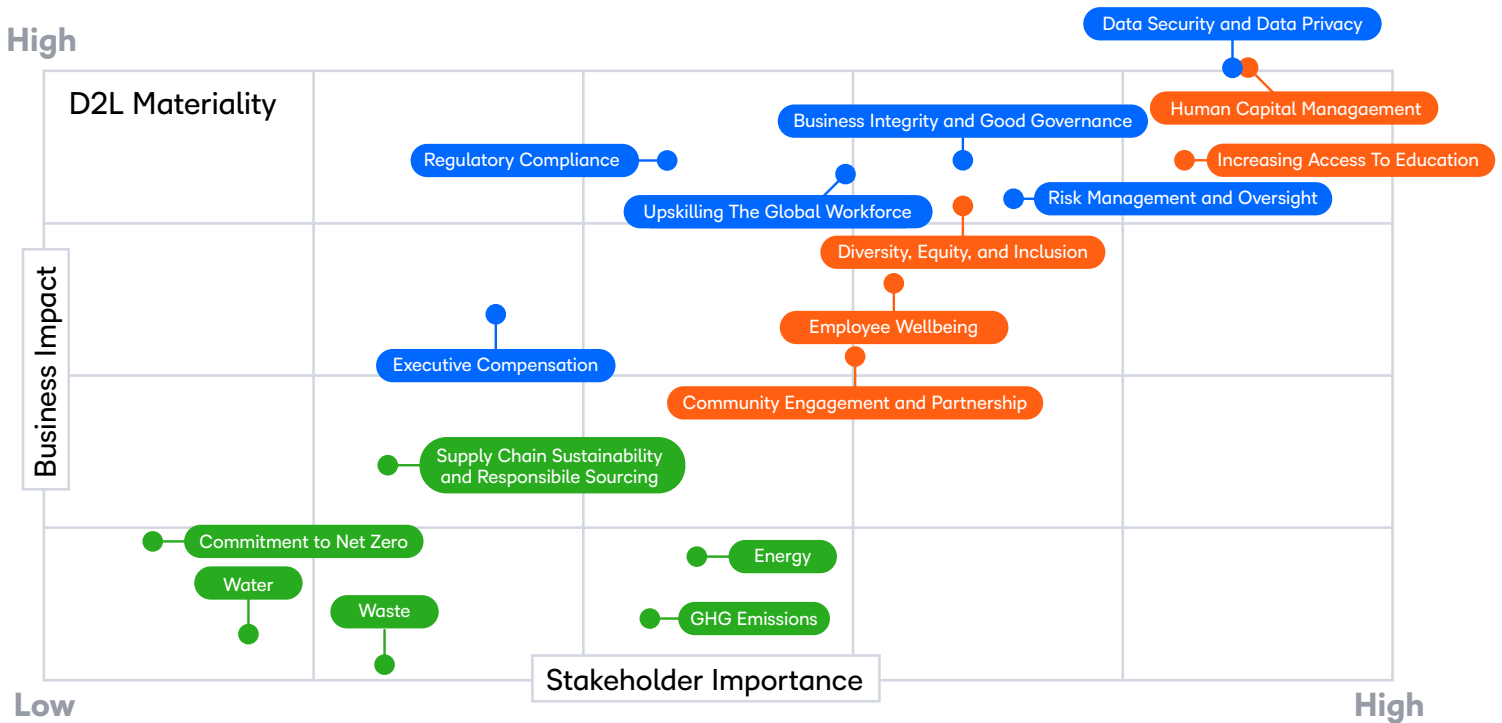
- Conducted a prioritization assessment to confirm key topics among our stakeholders.
- Conducted over 30 interviews and received over 120 survey responses to prioritize D2L's material ESG issues, aligned with relevant issues listed in the Sustainability Accounting Standards Board (SASB) and Global Reporting 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

LEGEND ● Governance ● Environmental ● Social



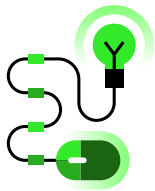
LOOKING AHEAD

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 principle³ in the management of ESG issues material to our business and we continue to seek input on emerging ESG issues from our stakeholders.

³ 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 GRI suggests that this principle should be applied to social ESG topics, as well.

D2L Sustainability Strategy

Our Sustainability Strategy consolidates our objectives and key metrics, related to our material ESG topics, across several teams at D2L into a central system for tracking and management. Four pillars help guide our corporate actions and provide a framework for D2L to make a meaningful difference.



Transforming the way the world learns

We build technology that, in partnership with our customers, supports increased access to quality education and increased engagement in hybrid, in-person, and online learning formats and that is transforming learning moments for students and employees alike. Our technology supports upskilling and learning pathways through a unified and user-friendly experience built to maximize results.

Objective

Make the world a better, brighter place for instructors and learners by collaborating with customers and partners to drive impact through our product and social impact efforts.

Metrics

Business Growth

revenue
number of users

Social Impacts Metrics

increase access to education
improve learning outcomes
enable instructors and administrators

Philanthropy

volunteer hours donated
donations of time and technology



Operating with integrity

Operating with integrity, including our practices around strong data management, service reliability, AI 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.

Objective

all customers, users, and partners are confident in the security, privacy, availability and integrity of their data.

Metrics

our certifications
uptime
minutes of downtime per month/site



Empowering our people

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

Objective

Build and foster a culture where our employees feel valued, included and enabled to do the best work of their lives.

Metrics

Learning and Career Growth

hours of professional development conducted across the company vs. the industry average internal mobility rate

Employee Engagement

employee net promoter score

Diversity, Equity, Inclusion, and Belonging

number of VP+ members who identify as women



Protecting the environment

Being responsible corporate citizens includes measuring, addressing and taking accountability for our environmental impacts. It also means understanding our sustainability-related and climate-related risks and opportunities. We are committed to continuing this work and doing our part to protect the planet.

Objective

Play our part in environmental protection by minimizing our organizational and value chain impacts.

Metrics

Energy Efficiency

energy consumption/emissions produced revenue/user (unique logins) count

GHG Emissions

scope 1 and 2 emissions
scope 3 emissions

How Our Sustainability Strategy Maps to the UN SDGs

Aligning with the **UN SDGs** demonstrates how the work we do is supporting progress toward these global goals. Below is a snapshot of how our pillars align with specific SDG goals and sub-indicators and how our work helps achieve these desired outcomes.



Transforming the way the world learns

SDG 4: Access to Quality Education and SDG 17: Global Partnership for Sustainable Development



SDG (indicator)

How our work helps achieve the SDG

4.1 By 2030, ensure that all girls and boys complete free, equitable and quality primary and secondary education leading to relevant and effective learning outcomes

D2L works with school boards all over the world, and in FY24, we served over 3 million Kindergarten–Grade 12 (K-12) students globally.

4.c (4.c.1) By 2030, substantially increase the supply of qualified teachers, including through international cooperation for teacher training in developing countries, especially least developed countries and small island developing States

D2L maintains a strong partnership with the Wilfrid Laurier Educator and Leadership Institute (ELI), which supports professional development and intercultural exchange for educators in Haiti, Egypt and Nepal. This year, ELI brought together **159 Educators** to learn from each other in Kathmandu, Nepal.



17.9 (17.9.1) Enhance international support for implementing effective and targeted capacity-building in developing countries to support national plans to implement all the Sustainable Development Goals, including through North-South, South-South and triangular cooperation

In FY24, we joined governments and public and private stakeholders in their support for the OSUN's multi-stakeholder pledge aiming to achieve 15% enrollment of refugees in higher education by 2030 by pledging support for OSUN's new pilot program in the Dadaab refugee camp in Kenya.



Operating with integrity

SDG 9: Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation



SDG (indicator)	How our work helps achieve the SDG
<p>9.5 (9.5.1) Enhance scientific research, upgrade the technological capabilities of industrial sectors in all countries, in particular developing countries, including, by 2030, encouraging innovation and substantially increasing the number of research and development workers per 1 million people and public and private research and development spending</p>	<p>We invest in research and development in emerging technologies through our work in D2L Labs and with our customers through the D2L Innovation Guild. We also encourage our employees to bring their creativity to life and recognize their contributions through the D2L Inventor Incentive Program.</p>



Empowering our people

SDG 5: Achieve gender equality and empower all women and girls



SDG (indicator)	How our work helps achieve the SDG
<p>5.5 (5.5.2) Ensure women’s full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life</p>	<p>We are proud to have over 30% female representation on our board of directors and over 43% female representation across our workforce.</p>



Protecting the environment

SDG 13: Take urgent action to combat climate change and its impacts



SDG (indicator)	How our work helps achieve the SDG
<p>13.3 (13.3.) Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning</p>	<p>In FY24, D2L partnered with Blackberry to support Actua, a nonprofit focused on STEM and climate education for youth. While D2L itself faces low levels of climate risk, we have the opportunity with our platforms and products to provide opportunities to improve access to education on climate and climate-related impacts.</p>

04

Transforming the Way The World Learns



Transforming the Way the World Learns

We aim to create positive social impact every day through the technology that we build, in partnership with our customers, and with the support of our dedicated employees. Through our technology, we enable our customers serving learners through lifelong learning to provide engaging learning moments in hybrid, in-person, and online learning formats that meet the needs of learners, regardless of age, ability, or location.

D2L Social Impact Metrics

In FY24, we began to quantify the impact that we drive with our customers to support learner and educator success on our platforms. Subject matter experts across our business fed into our process to identify the impacts and our social impact metrics are the result of this work.

Social impact metrics allow us to measure and track the social return on investment of our products and services, and continue to be deliberate in the social impacts we help create. We plan to track the metrics internally prior to publication.

Over time, our social impact metrics will help quantify *what* specific impacts we achieve and what we support our customers in achieving. *How* we achieve these impacts is detailed below.



Access to education

Increase access to education through our platforms and products.



Improved outcomes for learners

Support the achievement of stronger learning outcomes, regardless of stage of life, through digital learning tools.



Instructor and administration enablement

Enable instructors and administrators to increase efficiency and effectiveness in learning in order to achieve success.

D2L has more than
18 million users
with customers in over
40 countries

Partnering With Our Customers to Transform Learning

In partnership with our customers, we help 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. Below is just a snapshot of some of the impacts D2L supports.



INCREASING ACCESS TO EDUCATION

Our platforms and products support access to education by removing barriers and meeting the unique needs of all learners, regardless of age, ability or location.



Education is one of the most powerful tools to combat systemic injustice and break the cycle of incarceration. Our customer Orijin, previously known as the American Prison Data Systems (APDS), is helping empower 20,000+ incarcerated learners to build successful careers alongside formerly incarcerated teachers. “The Master Plan” is a 10-unit module designed to help incarcerated learners build their capacity for self-driven success, think beyond their current circumstances and architect a master plan to achieve their life and career goals.



One of the ways Columbia University uses Brightspace is in partnership with Bard College to deliver Collaborative Network Classes to 45 partner institutions worldwide. This is delivered through OSUN, which supports 7,000+ students with undergraduate and graduate level courses, programs, and certificates designed to promote livelihood pathways and opportunities for prisoners in the U.S., refugees in Kenya, and other participants in low-resource settings, to improve access to education and improved opportunity.



IMPROVING OUTCOMES

Built-in and add-on tools support instructors with accessibility, early interventions and high-quality content creation to improve learner outcomes.



Public Charter School, Maine Virtual Academy (MEVA) implemented Creator+ and in the past year has seen a 6% jump in student retention, a 7% increase in reenrolment and improved academic achievement—moving from the 44th to the 57th percentile in student median growth. Creator+ has made it easier for MEVA teachers to add engaging features like carousels and hot spots, embed all types of content, and create practice activities, and it’s more accessible for screen readers.



The Business Administration Diploma Program at the Southern Alberta Institute of Technology (SAIT) sought to create a virtual onboarding program to better equip students for success, called LaunchPad. The team utilized Intelligent Agents for communicating and pulling engagement reports to inform an iterative, evidence-based development approach. Since its introduction, 2,137 students have experienced LaunchPad. SAIT’s Business Administration Diploma Program has seen enrollments grow 86% in this time, with an expected increase of 20%–30% next year.



ENABLING INSTRUCTORS AND ADMINISTRATORS


At D2L, educators are our superheroes. We empower the work educators and administrators do every day by creating tools to support efficiency, effectiveness, and creative delivery of content and educational services.



Lynn Thomas, a secondary school English teacher at the Grand Erie District School Board, utilized D2L Brightspace to create an Escape Room to gamify learning for her students. She cites D2L Brightspace’s release conditions as the feature that makes building escape rooms possible—from reading a content page, to submitting an assignment to getting a certain range of marks on a quiz and many more. Lynn used release conditions to create a series of challenges her students had to “solve” to complete their task. She was able to incorporate Intelligent Agents into some of the escape room challenges to automatically email the student when they complete tasks—emailing them a clue or secret message to help them open the next room. Her design also allowed for building escape rooms that can be tailored to each student’s interests and personalized pathways—making each learning journey unique.



Southern Illinois University Carbondale’s commitment to teaching and student excellence is supported by D2L Brightspace’s robust data tools to make real-time decisions and interventions. For example, in their first-year seminar course, very few students miss key assignments because of the use of Intelligent Agents to automatically remind them when assignments are due. Instructors also get notification reports of the few students with missing work so they can reach out to them directly. A data dashboard also arrives daily, so student advising teams can reach out to students for wellness checks.



To learn more about how we partner with our customers to transform learning, visit our [**Customer Corner**](#).

Building Technology That Makes a Difference

ACCESSIBILITY

Accessibility is a key priority for D2L as we focus on creating impactful learning moments for each unique learner throughout their educational journeys. At D2L, accessibility happens by design. Our purposeful practice of inclusive design spans our entire product development cycle. We put the user at the center from the very beginning and design to help not only meet their diverse educational needs but also enhance their personal learning breakthroughs.

As we leverage the rapidly emerging advancements in artificial intelligence (AI) technologies, we continue to design with learners and instructors with disabilities top of mind. We are proud to lead by example in this critical area of AI accessibility with D2L's global accessibility lead assuming the vice chair position of Accessibility Standards Canada's Technical Committee on Accessible and Equitable Artificial Intelligence Systems in January 2024.



We believe in the power of partnerships to make an inclusive impact on the education ecosystem, and to that end, we enable the use of specific assistive tools to meet the accessibility needs of our users. We work with partners that:

- provide additional technology to enhance the accessible user experience
- elevate the accessibility of content created within Brightspace
- support the practice of inclusive pedagogy

Details on our accessibility partnerships can be [found on our website](#).

As we face a world of rapid technological transition, accessibility is a key ingredient to achieving an inclusive and equitable future. To that end, in addition to our technology partners, we work with various stakeholders to advance training, thought leadership, policy and online resources for accessible learning.



organizations that support people with disabilities and other minority groups have chosen to be our customers. We are proud that D2L Brightspace meets their unique digital accessibility needs and that we can accompany them in furthering their organizational learning mandates.

- 1** Educating our customers: Through our **Accessibility Academy**, we offer courses to support the inclusive teaching and communication needs of all of our customers, including our **Online Accessibility Lab** to support knowledge building on using D2L Brightspace for inclusive teaching.
- 2** Upskilling our employees: We partner with the International Association of Accessibility Professionals (IAAP) as an organizational member. This has enabled D2L employees to complete accessibility certifications such as Certified Professional in Accessibility Core Competencies (CPACC) and Web Accessibility Specialist (WAS).
- 3** Contributing to the accessibility community: We are proud to extend our impact on the larger global community of accessibility professionals with D2L's selection as a member of the Global Leadership Council of the IAAP in January 2023, and as the vice chair of the council from January 1, 2024.
- 4** Promoting accessibility around the globe: We actively support national and international action on accessibility through our presence in the Advisory Council of the **Canadian Accessibility Network** and the Web Content Accessibility Guidelines **Silver Community Group** of the World Wide Web Consortium.

D2L conforms to the **Web Content Accessibility Guidelines (WCAG) 2.2 Level AAA standards** and complies with regulations such as **Section 508 of the Rehabilitation Act, 1973**, and the **European Accessibility Act** (Directive 2019/882). Our accessibility reports posted publicly on our **Accessibility Standards** page show our conformance status on their reporting date.

We support accessibility initiatives at both industry and government levels. Since 2016, we continue to be the only LMS member of the National Federation of the Blind's **(NFB) Strategic Nonvisual Access Partnership** program, and we helped shape public policy development in accessible education in Ontario through leading the subgroup on Digital Learning & Technology in the Postsecondary Education Standards Development Committee under the Accessibility for Ontarians with Disabilities Act, 2005; the **final recommendations** of the committee are posted online.



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:

The products we develop are designed to help make learning experiences better

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. This exploration focuses on how emerging technologies can be leveraged to enable new ways of learning. Our findings serve as an input into our product road map and future company direction. A [selection](#) of past D2L Labs projects is available on our website. Over the past year, the work of D2L Labs has been focused on potential uses of generative AI (GenAI) to support various stakeholders across our products and platforms.

We are supporting our growing community of customers and users

We provide several research grants to support innovation and technological development in education.

D2L and Purdue launched a \$25,000 grant program to recognize individuals and/or teams at Purdue University to support research and tool development to improve instructors' experiences on the Brightspace platform and support learner success.

[See past projects from awardees on the Purdue website.](#)



We are contributing to the broader dialogue and knowledge base on education, training and skills

D2L Teaching and Learning Studio:

1 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 diverse and unified community of 98 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



THE TEACHING AND LEARNING STUDIO IN FY24

Total podcast downloads **3,765**

Our most popular episodes:

How ChatGPT Could Change Higher Ed

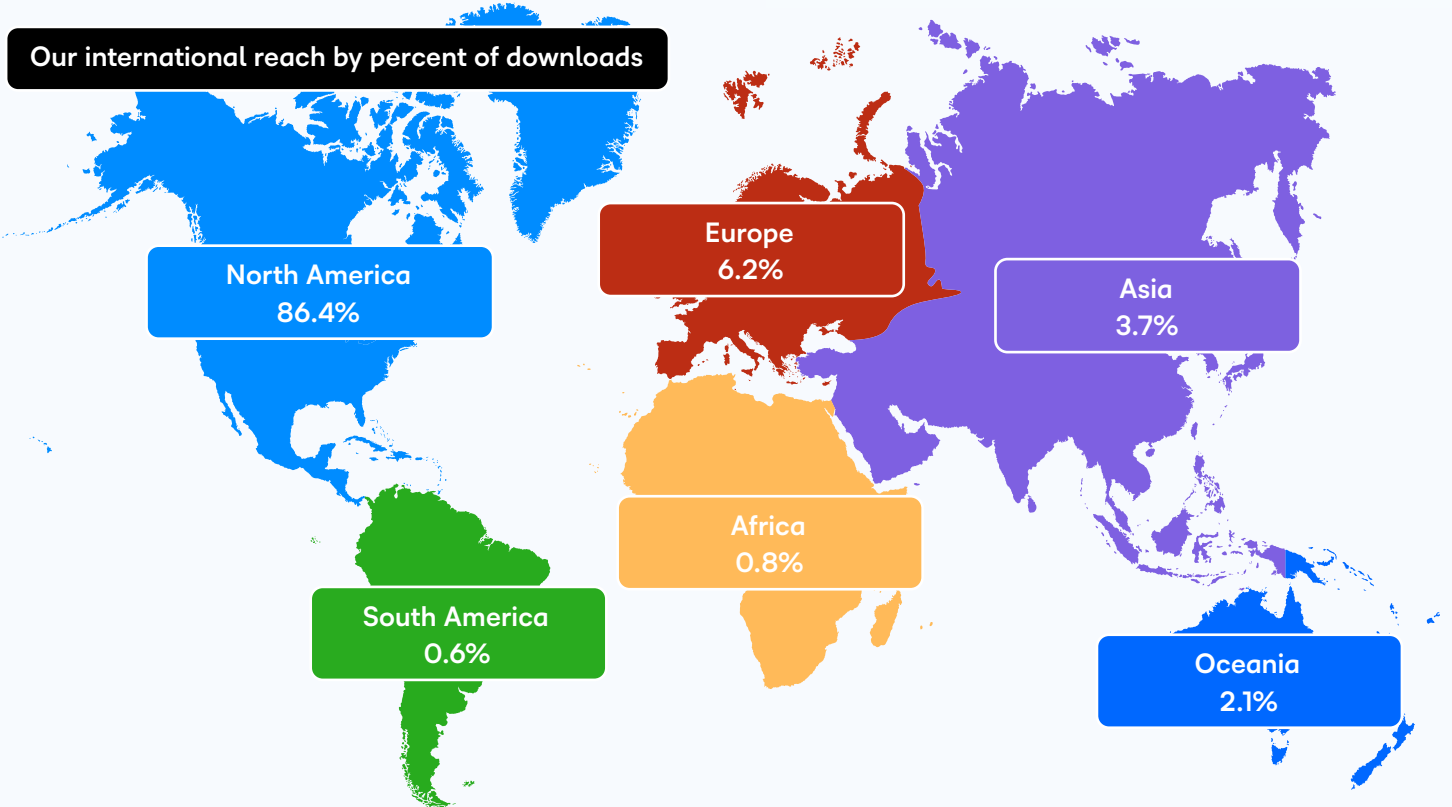
with Dr. Antony Aumann and Dr. Bettyjo Bouchey

The Future of Higher Education Enrollment

with Dr. Thomas Cavanagh

How to Design Micro-Credential Courses

with Dr. Luke Dowden



2 AI Ethics and Governance Course:

In November 2023, D2L launched a **free AI course**, “Introduction to AI Ethics and Governance,” built in partnership with AI specialists INQ Consulting. Through this course, anyone anywhere can learn about AI ethics, governance and the emergence of AI regulation. The course offers practical advice for safely deploying AI governance systems to best maximize AI’s benefits and mitigate its possible risks.

3 Skills and the Future of Work:

We contribute to the broader dialogue and knowledge base on education, training and skills with original research, bespoke events, podcast series and master class professional development offerings. A selection of our initiatives:

White papers and original research:

Future of Work and Learning White paper Series: Our annual whitepaper features original research 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 help inform leaders, policymakers and practitioners and inspire action on a long-term vision for education and training that is more technology-enabled, sustainable, inclusive and empowering for learners.

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 policymakers and address real challenges. Through partnerships and presentations, this research and guidance is shared freely with our stakeholders.

“The Skills Shift” Podcast:

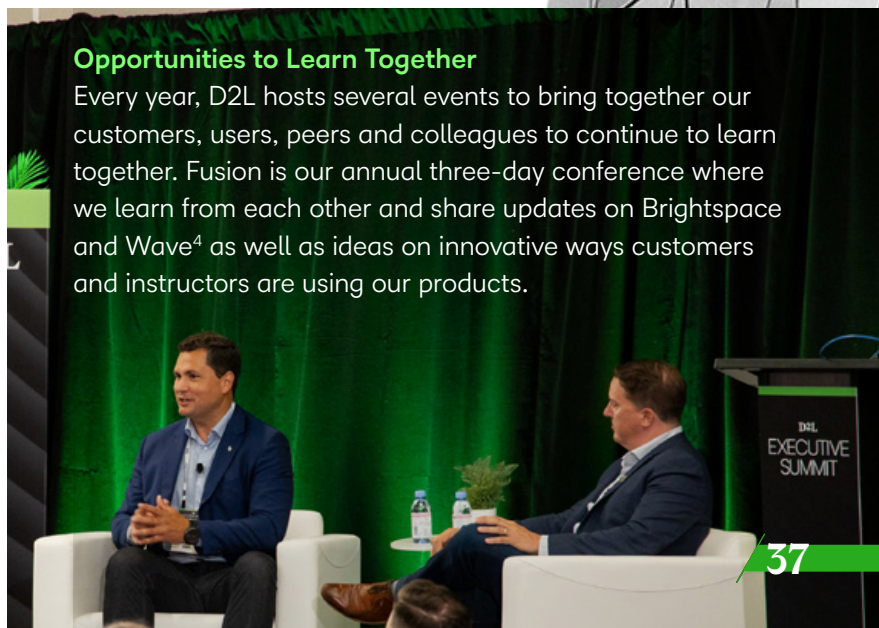
Launched in FY24, “The Skill Shift” hosts conversations on innovative approaches to strategic workforce planning, talent acquisition and retention, and learning and development with experts, researchers, and thought leaders. The podcast aims to share ideas on how to prepare workforces for the future and address skills gaps in various industries.

Executive Summit:

Hosted at our annual company conference, Fusion, the Executive Summit provides a forum for executive leadership in K-12, higher education, corporations and governments to discuss the challenges and solutions that lie ahead for the future of work and learning.

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 and share updates on Brightspace and Wave⁴ as well as ideas on innovative ways customers and instructors are using our products.



⁴ Pursuant to an announced spin-out transaction, D2L has agreed to sell a 70% interest in the D2L Wave upskilling technology to a company owned by CEO John Baker, with an expected mid-2024 closing date. For more information, please see our FY24 Annual Information Form and our press release announcing this transaction. As this transaction is anticipated to close in FY25, we intend to explore the potential impacts as they relate to our ESG material issues in our FY25 Sustainability Report.

Giving Back to Our Community

PHILANTHROPY PROGRAM

Our philanthropy program allows us to extend our reach and help provide transformative learning moments for those who need it most. We partner with high-impact organizations around the world, play an active role in our communities through donations and volunteering, and come together to pool our resources when crisis hits.



SUPPORTING OUR MISSION AND VISION: CORPORATE CAUSE PARTNERSHIPS

We believe in the power of partnerships to drive impact. To this end, D2L partners with organizations around the world by leveraging our expertise in learning technology to support improved access to quality education and training. Our corporate cause partnerships fall under two key themes:

1

Strengthening Global Education Systems

D2L has a role to play to support access to education, improve learner outcomes and enable instructors and administrators, particularly those in vulnerable contexts.



Open Society University Network (OSUN)

We are thrilled to support OSUN's Hubs for Connected Learning Initiatives model in the Dadaab refugee camp. D2L is joined by the Baker Family Foundation to support 150 refugees in accessing the pilot project led by the OSUN Hubs, titled "A Pipeline Strategy for Youth Affected by Forced Displacement." This Pipeline pilot will equip students with the necessary critical thinking, analysis, and digital literacy skills in preparation for higher education and labor pathways. Our work with OSUN builds on the preexisting United Nations Human Rights Commission's pledge **to achieve 15% enrollment by 2030 in expanding refugee access to higher education and self-reliance** by investing resources, technology and time to support OSUN Hub's pilot in the Dadaab refugee camp.



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

D2L is a proud partner of ELI, 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. Today, ELI focuses its efforts in Haiti, Nepal and Egypt. In FY24, D2L launched eight new courses for ELI. These free-to-learner courses, offered in both French and English, provide skills training in the professional development areas of K-12 science and technology pedagogy, leadership competencies, mathematics pedagogy and special education. All courses can be found on D2L Open Courses, a public Massive Open Online Course (MOOC) platform that offers courses to the general public. To date, more than 2,000⁵ educators in Haiti, Egypt, and Nepal have completed training via ELI. It is estimated that these educators directly instruct more than 100,000 students.

⁵ For more information, please see Wilfrid Laurier University's [website](#).

2

Removing barriers faced by women and girls as well as Black, Indigenous, and people of color (BIPOC)

Research in our field still shows a lack of women and girls and BIPOC in tech. We have focused part of our partnership development on supporting the work being done to bridge the gap in STEM-focused education and careers.



D2L and BlackBerry partnered to provide Actua, a national STEM outreach organization, with funding to support Indigenous-led STEM education for youth.

Actua is Canada's leading STEM outreach organization. A leader among its peers in impact measurement and programming, Actua maintains extensive delivery and partner networks across Canada. Of its many programs, Actua's investments in Indigenous-led participation in STEM skill development, with its land-based InSTEM (Indigenous STEM) program and in-classroom workshops, including in the North, reaches over 35,000 Indigenous students across Canada annually.



STRENGTHENING OUR COMMUNITIES: COMMUNITY GIVING PROGRAM

In FY24, we reframed our community giving program to more efficiently disburse our allocated funds to organizations that align with our business mission and values and to support issues important to supporting our learners. D2L provides donations and sponsorships and coordinates matching campaigns to support organizations contributing to STEM education, kids' mental health & wellness, and community building. Learn more at D2L.com/about/philanthropy.

SHARING OUR TIME AND EXPERTISE

Involvement in our communities is important to us. Through our volunteer time off 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 coming together over the year to donate blood at various locations around Canada, for a total of over 200 blood donations in FY24.

Another way we share our time and expertise is through our Night School program. Night School offers quarterly webinars and open discussions on topics that are important to us and our communities. Some of the sessions we offered this year include discussions on sustainability, accessibility and building and maintaining successful employee resource groups.

Supporting Community Food Banks

In FY24, D2L employees around the world came together to give to local food banks. Together, we donated over \$15,000 through contributions from our employees, with exact matching from our CEO, John Baker, and partial matching from D2L's Philanthropy Committee.



In FY24,
D2L employees
donated over
215 days
of our time.



Responding to Global Events

Regional emergencies over the past year continue to impact access to education. Global conflicts and climate events are chief among some of the key moments that have impacted much of the progress made toward access, outcomes, and stability in past decades. In response to one such series of events, D2L matched employee donations made to the Canadian chapter of the International Committee of the Red Cross (ICRC) for the earthquakes in Turkey and Syria. In total, over \$8,000 was contributed to the ICRC's efforts to support Turkish and Syrian residents facing the reality of the earthquakes on the ground.



05

Operating With Integrity



Operating With Integrity

The opportunity to serve 18 million users (including children) across more than 40 countries is a privilege and a responsibility we take very seriously. At D2L, we are secure by design. We prioritize data confidentiality, availability and integrity. As a trusted partner to educational institutions, governments and companies, we understand that the governance and management of our customers' data are integral to the success of our customers. As such, we maintain world-class data practices that protect and respect our customers' and users' information and uphold industry-leading service reliability standards. This year,



D2L achieved ISO 27701:2019 compliance for Privacy Information Management Requirements and Guidelines.



We achieved Texas Risk and Authorization Management Program (TX-RAMP) Level 2 Certified Cloud product certification for D2L Brightspace.



Our CEO, John Baker, was invited to speak at the White House Summit on the importance of cybersecurity and D2L's commitment to upholding high security standards



We were among the first in the sector to sign the voluntary K-12 Secure by Design Pledge, sponsored by the U.S. Cybersecurity & Infrastructure Security Agency. Signing the pledge is part of our commitment to reduce cybersecurity burdens on schools and teachers to help them focus on their core mission of teaching and learning.



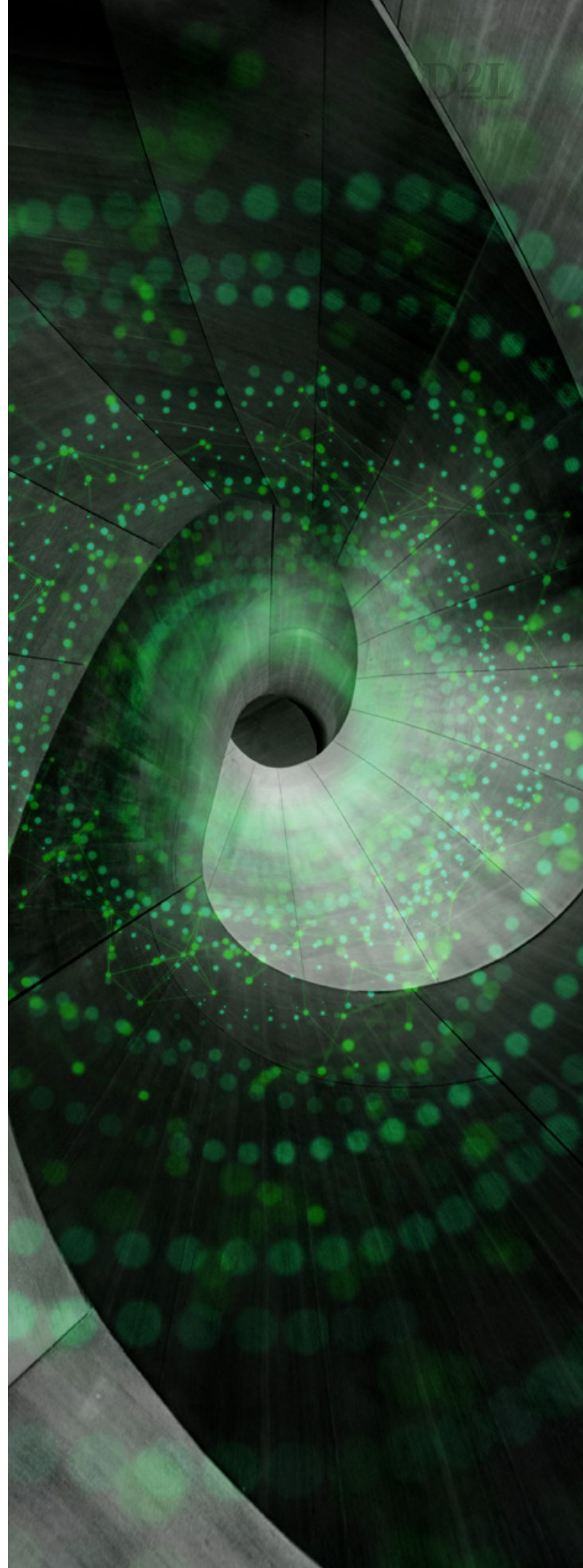
D2L continues to comply with the requirements of ISO 27001, ISO 27017 and ISO 27018 security standards.

Responsible Use of Artificial Intelligence (AI)

Recent advances in AI, especially generative AI (GenAI), present significant opportunities for D2L and the education and training markets. For our customers, these opportunities include simplifying instructor workflows to give them more time for teaching, empowering learners with personalized learning pathways and curriculum. Additionally we see opportunities to improve and streamline our own internal processes using AI to help us develop and deliver our products and services more efficiently and effectively.

At the same time, AI technologies can pose more risk, requiring us to remain vigilant in areas of data privacy, security and, above all, fundamental human rights. As we deploy and develop responsible GenAI-based systems, we remain committed to minimizing risks⁶ by:

- protecting learners (especially the youngest learners) from misinformation by keeping a human in the loop
- enabling learners and instructors to keep their agency and ability to choose courses of action
- designing, developing and using AI systems in a manner that strives to be unbiased and fair; this extends to issues of accessibility—we need to consider the needs of a diverse set of learners and adapt AI tools as our understanding of accessibility evolves
- maintaining strong protections for learner and instructor data, in accordance with best practices and legal requirements



⁶ D2L generally applies the risk framework set out under the EU AI Act in our assessment of AI risk.

D2L has embraced this shift—both the opportunities and the responsibilities—with several key initiatives, demonstrating our leadership in research and development in this area.

LEADING WITH INTEGRITY: D2L RESPONSIBLE AI PRINCIPLES

D2L strives to design, develop and use AI systems that are unbiased and fair, informed by [D2L Responsible AI Principles](#). These principles are firmly rooted in our mission to transform the way the world learns and our commitment to responsible, trustworthy and compliant business practices.

- **Privacy:** D2L prioritizes the privacy rights of our customers, both in the development and use of AI systems and in providing our customers control over their personal data, including automated decisions that are based on their personal data. Our use of AI is consistent with the statements we make in our [Privacy Center](#).
- **Bias and nondiscrimination:** D2L strives to design, develop and use AI systems that are unbiased and fair so that they do not cause harm to people interacting with D2L.
- **Security and Robustness:** D2L develops and employs safety and security practices that test AI systems to minimize the risks of harm and provide reliability and security throughout the AI system life cycle.
- **Transparency:** D2L believes AI systems should have explainable outputs and provide relevant stakeholders with disclosure about when, where and how AI systems are used.
- **Accountability:** D2L's practices related to AI should be clear and accountable to internal and external stakeholders. D2L invests in appropriate mechanisms to support the safe and responsible use of AI.

PROTECTING HUMAN RIGHTS: D2L AI POLICIES

We are embracing the responsible use of AI, which has been enshrined in our AI policies. We maintain two key internal policies that govern our use, deployment and development of AI at D2L. These policies are linked to our existing governance and management system of data security and data privacy policies.

- **D2L AI Policy:** Establishes D2L principles and accountability mechanisms for the responsible use of AI and to describe roles and responsibilities for all D2L personnel in adopting and using high-impact AI systems safely and responsibly. This policy includes use of:
 - an AI Impact Assessment to assess the impact of any AI systems that are procured, downloaded, or developed in-house
 - a Vendor Management Questionnaire for any vendor using AI systems
 - an Incident Response Plan to address business continuity in the event of an information security incident
- **D2L AI Acceptable Use Policy:** Establishes guidelines for the responsible use of AI systems at D2L, specifically the acceptable and unacceptable uses of AI. The policy guides actions for the unintended misuse of AI systems.

Accountable to D2L's senior leadership team and the Board of Directors, D2L's AI Working Group is responsible for overseeing the use of AI at D2L by offering guidance for the safe and responsible design, development, and deployment of AI systems across the company. The AI Working Group works closely with the Privacy and Security Governance Committee to maintain a holistic compliance function around AI.

SHARING LEARNINGS: COLLABORATING WITH AI PARTNERS FOR RESEARCH AND DEVELOPMENT

Collaboration is critically important to the purpose-led development of AI tools. We aim to contribute meaningfully to the development of governance mechanisms and research to guide our development of AI-supported tools.

D2L joins 11 other organizations on the [Steering Committee of the Software & Information Industry Association-led effort to publish the Education Technology Industry's Principles for the Future of AI in Education](#) to support the sector in ensuring AI is appropriately and positively applied for the benefit of students and educators.

We also co-led the Generative Artificial Intelligence in Canadian Post-Secondary Education survey with the [Canadian Digital Learning Research Association \(CDLRA\)](#). The survey examined faculty and administrator views on GenAI, gathered anonymously from 438 higher education administrators and faculty members across 126 Canadian institutions. Findings revealed:

- **GenAI policies, regulations and guidelines are still in the early stages.** Twenty-four percent of participants were unaware of whether their institution has established any regulations, guidelines or policies pertaining to AI tools.
- **GenAI usage is currently inconsistent.** Descriptions of how GenAI tools are being used reveal inconsistent and experimental initiatives largely guided by faculty and some institution-wide efforts, such as workshops and working groups.
- **GenAI sentiment varies.** When considering the potential for the use of GenAI tools within higher education settings, 32% of faculty and administrators have mixed feelings about AI, ranging from optimistic to concerned.
- **There are concerns about the future of GenAI.** Looking ahead to the year 2033, 56% of faculty members and administrators outlined their concerns about the biases and limitations of AI and question AI's impact on the price of education.



“The narrative around AI in higher education seems to paint it as making unwanted and dangerous incursions, with a focus on academic dishonesty, the need for policy or guidelines, and in some quarters, the risk of AI replacing the faculty member’s role. The real question we need to all be contending with is: Are we equipping our graduates for a future where the life course is disrupted by frontier technologies, including AI?”

Terry Di Paolo,

Vice-Provost of e-Learning at Dallas College

EMPOWERING EDUCATORS: HARNESSING THE TRANSFORMATIONAL POWER OF AI

Technology is a human creation—and at D2L, we are constantly creating tools with our users front of mind. D2L's latest GenAI-powered technologies are all focused on improving teaching and learning efficiencies while keeping humans in the loop. Some of our newest developments include:

- a GenAI feature that can assist educators with authoring **practice questions** for knowledge checks. This not only makes the learning content more engaging and interactive but also helps students self-evaluate and improve, leading to better student outcomes.
- a new **D2L Brightspace Virtual Assistant**, which uses AI to bring users contextualized help and documentation from within Brightspace.

As we increasingly produce and use AI tools, we must ensure that every learner and instructor can use them. Our Global Accessibility Lead, Dr. Sambhavi Chandrashekar, offers a three-pillar framework that we can use to anchor our thinking when considering accessibility and ethics in the context of emerging AI tools:

- **Commitment to sustaining technology accessibility:** Consider the benefits and potential barriers of the tools we're implementing.
- **Creativity in course design and delivery:** Maintain the creativity to shift design as needed.
- **Community to collectively work for the common good:** We need collective support to successfully negotiate large-scale transformations.

We are committed to ensuring that accessibility is top of mind in the development of our AI tools, like in everything else we do at D2L.

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. D2L is not monitoring, blocking, content filtering or censoring data by request from any government. We do not, to our knowledge, have customers⁷ 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

⁷ An institution's billing entity

Data Security

DATA SECURITY LEADERSHIP

Data Security comprises the Information Security Management System (ISMS) and the Privacy Information Management System (PIMS). The ISMS is managed by the Information Security team with the oversight of the Chief Technology Officer. The PIMS is managed by the Privacy team with the oversight of the Chief Privacy Officer. Independent assurance of the ISMS and PIMS is provided by the Security Compliance (SC) team through internal audits and by external auditors and assessor through external audits. The SC team reports to our Vice President of Product Operations.

Our Information Security and SC teams are responsible for:

- ensuring information security policies and procedures follow leading global standards, such as ISO 27001, ISO 27701, ISO 27017, ISO 27018, TX-RAMP Level 2 and Cyber Essentials
- completing internal security compliance audits
- Coordinating our external audits
- enforcing and updating policies and procedures
- actively watching for, identifying and mitigating information security risks
- Checking emerging certifications/requirements

SETTING HIGH STANDARDS FOR VENDORS AND PARTNERS

We hold all vendors and partners to the standards outlined in 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. In FY24, we included an AI impact assessment in our Vendor and Partner Assessment Process.

MAINTAINING TRUST

We share our security best practices and security policies and protection controls on our website for transparency and easy reference. Every person at D2L has a part to play in the protection of our data. 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 and 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 and defined logoff 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 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 processes and procedures. Where applicable, root cause is identified and logged.



Our Security and Compliance Certifications

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 fully 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

ISO 27701: 2019 Privacy Information Management Requirements and Guidelines

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.](#)



CYBERSECURITY FOR OUR YOUNGEST LEARNERS

Managing the data of our youngest learners is a profound responsibility. Not only have we built internal systems to provide best-in-class security for our customers, but we also continue to build on our existing security measures to enhance K-12 school ecosystem security in many ways, including:

- vetting third-party tools: Extending our information security review for our core integration partners to help reduce the burden on schools
- increasing K-12 access to cybersecurity training: Foster new (free and other) cybersecurity courses in collaboration with trusted third parties, including through D2L Open Courses to share best practices
- launching a new cybersecurity user community: Supporting K-12 administrators' cybersecurity knowledge-sharing within the D2L Brightspace Community



Data Privacy

RESPECTING AND PROTECTING THE PRIVACY OF OUR USERS

D2L is committed to protecting the privacy of customers' data. 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 SC 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 in accordance with applicable 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 support compliance with rigorous standards including:

- 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. Data Privacy Framework
- Level 2 Certification under the Texas Risk and Authorization Management Program (TX-RAMP)

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 the data of our youngest users. None of our products (D2L Brightspace, C+, P+ 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 Center, 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.



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 better than **99.95%** global uptime

OVER 1,300 customers have subscriptions to our Brightspace platform

100% of subscriptions are cloud-based

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 (i.e. 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 minimal time frame. The BCP is reviewed and updated on a continual basis and is overseen by D2L's Vice President of Information Technology.

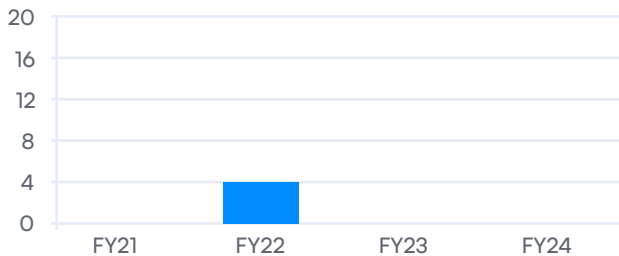
While we are prepared for extraordinary circumstances, we also maintain a host of methods to provide service reliability on a day-to-day basis:

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

Data	FY21	FY22	FY23	FY24
Minutes of downtime per month per customer site	2.1	25.6	0.6	0.9
Total customer downtime in minutes per site	25.5	307.5	7	10.3

Note: AWS suffered three major outages in FY22 and one minor outage in FY24 beyond D2L's control, which unfortunately affected our customers.⁸

Performance issues causing client downtime for 10–30 minutes



Service reliability issues causing client downtime for more than 30 minutes



⁸ AWS suffered three major outages in FY22, which unfortunately affected 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 recur. 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 (IP) 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 IP are critical to our success as a software company.

IP LEADERSHIP

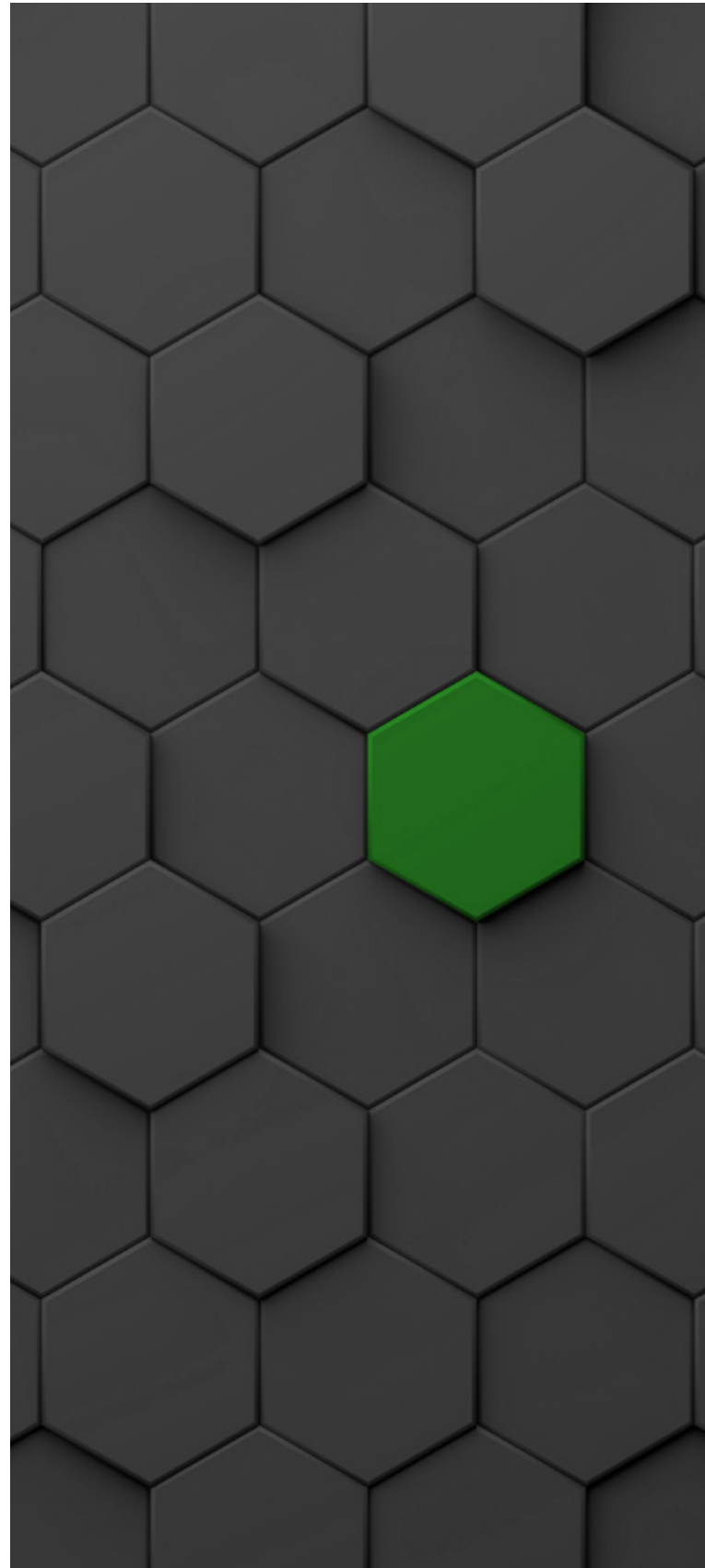
Protection of IP is jointly managed by our Chief Strategy Officer, our Chief Legal Officer and our President.

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 from our employees and external consultants.

D2L holds patents in Australia, Canada and the United States, and trademarks in the United States, Canada, EU, UK, Australia, Singapore, Mexico, Indonesia, South Korea, China, Brazil and India. A list of our [trademarks and patents](#) is publicly available on our website. We maintain Employee Confidentiality, Inventions and Nonsolicitation 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, application programming interfaces ([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.



Interoperability With Other Software Providers

Interoperability of our platforms and products with other software providers is critical to our customers' success. This year we have continued our commitments to interoperability of the ecosystem while making advancements in our extensibility. This year, D2L:

- Continued 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. Collaboration with 1EdTech means that customers can easily connect Brightspace with thousands of products to create a seamless user experience and enhance data privacy.
- Introduced the D2L IntegrationHub, built on LTI 1.3. and launched as a new catalog site that lists partner solutions that are available for integrations with Brightspace. The IntegrationHub makes it easy for Brightspace users to browse D2L's extensive list of integrated technologies and solutions, such as accessibility tools, student information systems, secure proctoring assessment platforms and many other partner solutions.
- Launched D2L Link, which allows our customers to integrate with hundreds of other systems to help automate manual tasks and improve data accuracy. We work with our customers to map an ideal workflow between Brightspace and other tools to help save time and improve business outcomes.

06

Empowering Our People



Empowering Our People

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.

People and Culture

D2L is proud to employ over 1,000 people across several countries. Our skilled and globally diverse team makes it possible to act on our mission to transform the way the world learns through understanding the world around us. Most of our employees are located in Canada, and we have a significant number of employees in the United States, United Kingdom and Australia, with bases in Brazil and Singapore.

	FY21	FY22	FY23	FY24
Total number of employees	More than 1,000	More than 1,000	More than 1,000	More than 1,000
Geographic distribution of employees				
Employees located in North America in FY24				90%
Employees located globally outside of North America in FY24				10%



PEOPLE AND CULTURE LEADERSHIP

Our Chief People Officer (CPO) is responsible for overseeing employee relations, including compensation and benefits, health, safety and well-being, talent attraction and retention, and diversity, equity, inclusion and belonging at D2L. Our CPO reports directly to our CEO.



“One of the major things that I love about D2L is its culture. D2L fosters an environment where we feel heard and supported. We D2Lers feel comfortable bringing our authentic selves, learning from each other and celebrating how unique we can be.”

Eliana Herrea,

Manager, Implementation Services

EMPLOYEE EXPERIENCE

D2L aims to deliver an employee experience that enables our global base of employees to do the best work of their lives and solve critical challenges, contributing to building the future of learning. Our Employee Value Proposition (EVP) highlights the unique aspects of our award-winning culture at D2L. Our EVP has five pillars:

1. We are mission-driven: Our culture is focused on impact, performance and results. We solve challenging problems that make a difference in the world of learning.
2. We have smart and passionate people: Our phenomenally smart employees are passionate about the impactful work they do and take a collaborative approach to solving complex problems.
3. We value diversity, equity, inclusion and belonging: We build and foster a culture where our employees are included, valued, heard and enabled to do the most impactful work of their lives.
4. We value growth and development: We partner with our employees to create opportunities for growth and advancement.
5. Employee well-being is a priority: We focus, support and prioritize the health and well-being of our people so they can bring their full selves to work.

Our employees join D2L and choose to stay because of our flexible and collaborative culture that prioritizes purpose, learning and inclusion.

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

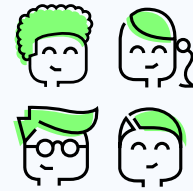
INDUSTRY-LEADING BENEFITS

Employee well-being is a priority for D2L. We believe that a healthy workforce leads to increased productivity, better teamwork and collaboration, and enhanced overall job satisfaction. Compensation and benefits are an important part of the support we provide to our employees. D2L employees are entitled to a comprehensive range of benefits, including medical, vision and dental coverage, mental health support, and well-being workshops. Our coverage includes help with travel and life insurance.⁹ D2L also provides:

- wellness subsidy (covers exercise memberships, certified personal trainers and race fees)
- home internet and mobile subsidy for employees
- retirement contributions
- learning and development support
- referral bonuses
- recognition programs
- Global Mobility Program
- personal and wellness days
- learning days
- volunteer days
- competitive vacation policy
- parental leave

⁹ D2L compensation and benefits differ per region. The majority of our employees are entitled to the benefits listed.

¹⁰ D2L conducted a survey on employee satisfaction in January 2024 that received participation from 87% of employees. The survey addressed a single question: "On a scale of 0–10, how likely are you to recommend D2L as a place to work to others?" Results were calculated using the Employee Net Promoter Score (eNPS), which allows companies to measure employee satisfaction. The method is detailed by Academy to Innovate HR.



Employee engagement

Our most recent Employee Net Promoter Score (eNPS) was

20¹⁰

In FY24, we organized several events for both in-office and remote workers. Our global D2Well Committee of 20 dedicated employees helped organize:

- our Wellness Roadmap, which includes monthly wellness themes, awareness days, live webinars and wellness sessions
- on-site and virtual yoga, Zumba sessions, and an in-office and virtual walk challenge
- a digital cookbook of favorite employee recipes

To close out a great year, D2L offered a Thank You Day to give all D2Lers a free day to prepare for the holiday season.

D2L also provides resources for employees to learn more about mental and physical wellness, like Mental Health and Burnout Prevention Toolkits, and frequent sessions on diverse aspects of well-being. D2L maintains health and wellness policies overseen by our CPO.

Most of our employees worked through hybrid or remote offices in FY24. To support employees' health and safety while working from home, employees can refer to our remote working policy to see if they qualify for financial help for ergonomic workspace setup options.

INVESTING IN OUR PEOPLE

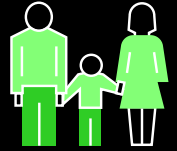
As a learning company, we prioritize skills development for our employees. We offer a generous annual stipend for our employees to use our Wave platform to enhance their skills through leading higher education providers on a wide range of topics like product, strategy and customer success. D2L employees receive two paid days off to complete courses.

We also provide several internal learning and development opportunities to grow our people and help each employee reach their goals.

Some of the ways our employees grow their skills include:

- **D2L Catch the Wave Program:** More than 40% of employees participated in D2L’s upskilling and reskilling Catch the Wave program. Courses range from microcredentials all the way up to transferable degree-earning credits from top-tier education providers.
- **Using Our Learning Software:** Our internal instance of Brightspace allows employees to complete their personalized onboarding and compliance courses, engage in discussions, and access learning and development courses curated by various departments within the organization.
- **Internal Career Fair:** We hold an internal career fair over the course of two days to offer employees an opportunity to learn about different parts of D2L and promote internal mobility opportunities. In FY24, over 25% of employees attended career development talks. One-on-one mentorship relationships were also facilitated by the People and Culture team.

Total number of employees who took parental leave, by gender



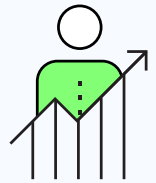
In total, 39 employees were on parental leave in FY24

67%
Women

33%
Men

Over

25%



of all employees earned a promotion or transfer in FY24.

D2L LEADERSHIP PROGRAMS



Learning, Engagement and Development (LEAD)

A nomination-based program that focuses on leadership skills and unlocking the next career level for participating employees.



Quarterly Leadership Speakers Series

These sessions occur quarterly and are an opportunity for our people leaders to gain meaningful insight into leadership from external speakers chosen for their ability and relevance to our leadership audience. Recent sessions have focused on Characteristics of High-Performing Teams and Effective Feedback.



Leadership Is Everyone's Business (LIEB)

This nomination-based program focuses on supporting individual contributors to harness the power of individual leadership and influence. In FY24, we had 56 participants in the LIEB program.



Leadership Community

Occurring on a monthly basis, the Leadership Community sessions provide leaders with the opportunity to learn about key leadership topics and behaviors that align with D2L's high-performance culture roadmap.

OTHER CAREER DEVELOPMENT OPPORTUNITIES

- GROW sessions are regular live learning sessions on a variety of professional development topics
- InFusion is our annual internal conference for technology, engineering and design teams to keep up to date with evolving trends and innovate on our products and services.
- Sales enablement sessions focus on a variety of topics from competitive intelligence to closing deals.
- All leaders are asked to meet quarterly with their direct reports to discuss performance and career development, including goal setting, check-ins and regular feedback.

AWARD-WINNING CULTURE

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

- Forbes and Statista's Canada's Best Employers 2024
- Canada's Best Managed Companies, Platinum Member (2013–2023)
- Canada's Top Employers for Young People (2012–2014, 2018–2024)
- Canada's Best Employer for Recent Graduates (2019–2023)
- Canada's Best Diversity Employers (2023–2024)
- Waterloo Area's Top Employers (2011–2024)
- Southwestern Ontario's Top Employer (2024)
- The Candidate Experience Award (2019–2023)
- Canada's Most Admired Corporate Cultures (2017–2023)
- Canada HR Reporter Innovative HR Teams Award Winner (2023)
- Human Resources Director Canada Innovative HR Teams Award Winner (2023)

Number of employees in our LEAD program in FY24

16 participants

Average hours of training per year per employee in FY24¹¹

63.7 hours / employee

¹¹ Included in this average are the following training opportunities: Onboarding (estimated at 16 hours per employee), employee use of D2L's professional development platform, Wave; D2L's training for employees on our products and services, D2L University; InFusion, LIEB, LEAD, Grow Sessions and Optimization Services Week (estimated at 40 hours per person).

Diversity, Equity, Inclusion and Belonging (DEIB)

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 doing our part, within our sphere of influence, to advance human rights in the workforce.

Our diversity, equity, inclusion and belonging efforts are focused across five action pillars:

1. Collecting diversity data
2. Training and enablement
3. Increasing our ability to attract, hire, develop and keep diverse talent
4. Building awareness
5. Reviewing processes, policies and programs

1. Collecting diversity data

D2L is constantly seeking to learn more about our workforce and our gaps in representation. In FY24 we continued our participation in the **Women in the Workplace Study** conducted by McKinsey & Company in partnership with **LeanIn.Org**. Insights from the report help us identify action areas as well as benchmark ourselves against industry best practices.

Within our significant locations of operation (countries where we have a concentration of employees), we are proud of the progress we are making toward creating greater representation and equality throughout our workforce.

Percentage of gender and racial/ethnic group representation for (1) management, (2) technical staff and (3) all other employees in FY24 ¹²		
Gender	Management	Women - 31% Men - 69%
Technical	Women - 27% Men - 73%	
Other	Women - 53% Men - 47%	
Black, Indigenous, People of Color	Management	Women - 25% Men - 75%
Technical	Identifying - 32% Nonidentifying - 68%	
Other	Identifying - 30% Nonidentifying - 70%	

¹² Only North American employees who elect to self-identify are included in the race/ethnicity data available. Gender data is based on our global workforce.

2. Training and enablement

As a learning organization, we are dedicated to growth and provide several opportunities for our employees to develop their awareness, leadership and self-reflection capabilities—skills that are crucial to a strong DEIB culture. We host regular trainings with employees, annual training for people leaders on anti-harassment and antibias topics, and require DEIB training for new hires.

- All new hires learn about “Diversity, Equity, Inclusion and Belonging at D2L” as part of D2L onboarding, which provides information on our DEIB programs, resources, strategy and policy.
- We host external facilitators in partnership with our Employee Resource Groups on topics like Black Resistance & Black Joy with CultureAlly as well as a Corporate Inclusivity session featuring Get REAL Movement and Truth & Reconciliation workshop with First Peoples Group.
- All employees are required to complete two courses upon joining D2L:
 1. Safe and Inclusive Workspaces: Anti-Harassment Training
 2. 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 DEIB-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 Anti-Harassment, Sexual Harassment, and Bullying Policy and Program, or speak directly to their People and Culture representative.

3. Increasing our ability to attract, hire, develop and keep diverse talent

A strong DEIB culture is pivotal in continuing to build great products, solve important problems and better serve the needs of our global customers. We 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 in hiring teams
- providing training and enablement on inclusive hiring practices
- shifting from a “culture fit” to a “culture add” mindset
- building and exploring partnerships with DEIB groups, associations and job boards to attract and hire talented people who bring diverse perspectives and lived experiences
- attending conferences, webinars and career fairs that represent diverse talent pools to cater to our hiring needs

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

- offer career development workshops to provide visibility into our interview processes
- ensure that internal learning and development opportunities have fair and equitable selection criteria
- 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
- cooperative education and experiential learning programs
- participation in job fairs and involvement with technology-oriented communities

4. Building awareness

Building awareness is critical to creating an inclusive company culture. Besides our training opportunities, we:

- maintain three **Employee Resource Groups** with executive-level oversight and engagement
- Publish a monthly newsletter on DEIB to support employee education and awareness
- Launched the Women and Allies in Leadership Speakers Series, which offers a special space dedicated to sharing stories, discussing pertinent topics, and learning strategies for personal growth.



EMPLOYEE RESOURCE GROUPS (ERGS)

In prioritizing inclusion and building community, we have created several opportunities for employees to connect on their similarities and their differences. Our ERGs provide an advisory role to leadership on topics such as talent attraction, interviewing best practices and inclusive office space design. ERGs share their interests through learning sessions, book clubs, panels and community-building events.



IDEA

With a mandate to actively create a more equitable, inclusive and safe space for all BIPOC employees at D2L, IDEA’s mission is to create awareness of the experiences of BIPOC D2Lers while enabling a culture of allyship that supports equity in the professional growth and development of all D2Lers regardless of race, ethnicity, nationality, and gender or sexual orientation.



D2SLGBTQ+

Dedicated to the creation and maintenance of a safe and positive work environment for all, the committee champions 2SLGBTQ+ needs in the workplace, provides training resources for managers as well as employees and leads social opportunities like lived experience panels and get-togethers.



WOMEN IN ACTION (WIN)

WIN aims to continue to elevate the voices of women and nonbinary folks, provide a safe space to support, build leadership skills and create awareness around opportunities and barriers women face in the workplace so that they can bring their best selves to work and build vibrant edtech careers.

5. Reviewing processes, policies and programs

Our team continuously reviews our people policies, programs and processes with a DEIB lens so that our policies embed belonging and do not pose barriers to any of our employee groups. Our policies are reviewed annually.

- Diversity, Equity, Inclusion and Belonging Policy
- Supplier Diversity Policy and a Supplier Diversity Program
- Whistleblower Policy and Process
- Anti-Violence Policy and Program
- Human Rights and Anti-Discrimination Policy
- Anti-Harassment, Sexual Harassment, and Bullying Policy and Program
- Health and Safety Policy



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 our business targets and our mission.

07

Protecting the Environment



Protecting the Environment

At D2L, we care about the state of the planet. We rely on planetary resources to deliver our services, and our customers, employees and other stakeholders care about the role we play in taking responsibility for our impacts.

As a software provider, we have limited direct impact within our supply chain to lower environmental impacts. However, we cannot ignore the far-reaching impacts of climate change. Climate events such as smog, drought and flooding have affected learners globally by limiting school opening days, buildings and transportation infrastructure, and impacting mental health and well-being.

At the same time, our platforms have the potential to mitigate some of these climate impacts on learners by allowing for continuity in access to education when these climate-related events occur with increasing frequency. We also know that providing education is critically important to equipping future generations with the skills to manage the lasting impacts of the changing climate.

For all of these reasons, D2L takes a proactive stance on managing our climate risks to ensure continuity of service and support for our customers.

Energy intensity and types of energy included in this ratio (fuel, electricity, heating, cooling, steam)

FY23	FY24
Energy intensity per user is 0.000130 MWh	Energy intensity per user is 0.0000506 MWh
Energy intensity per dollar of revenue 0.0000124 MWh	Energy intensity per dollar of revenue 0.0000050 MWh



Monitoring Our Environmental Impact

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

COLLECTING DATA

A sizable portion of D2L's environmental impact is linked to our partnerships with suppliers. One of our largest suppliers is our cloud provider, Amazon Web Services (AWS). Running our services from the cloud has many benefits, one of which is a significant reduction in carbon emissions resulting from our data center usage, compared to on-premises hosting.¹⁵ Amazon, the parent company of AWS, has committed to 100% renewable energy power by 2025 and net-zero carbon emissions by 2040.¹⁴

At D2L, we are also working to minimize the impacts within our own control. While we work with AWS to gain access to a broader range of data related to our usage, we are working on limiting the impacts within our control. Our data and activities are covered below.

Scope 1: Our Scope 1 emissions include the combustion of natural gas for space and water heating at our office locations in Kitchener-Waterloo, Toronto and Winnipeg.

Scope 2: Our Scope 2 emissions include the purchase of grid-fed electricity at all office locations as well as district energy (steam) purchases at our Vancouver and London office locations.

Scope 3: Our Scope 3 emissions include business travel (air, ground and hotels), employee commuting and teleworking, and purchased goods and services in our supply chain.

Data	2019	2020	2021	2022	2023
Total energy consumed (gigajoules) Based on electricity, steam and natural gas consumption within office spaces	12,873	9,988	9,755	7,506	3,296
Scope 1 GHG emissions in tons of CO ₂ e	231	183	192	155	98
Scope 2 GHG emissions in tons of CO ₂ e	128	77	65	53	27
Scope 3 GHG emissions in tons of CO ₂ e	2,177	339	101	1,563	2,594
Total water consumption (m ³)	1,246	841	550	439	1,644

Notes:
Scope 1 & 2 GHG emissions decreased in FY24 due to the new Kitchener-Waterloo headquarters representing a significant downsizing (38,000 square feet (sq ft)) compared to the old Kitchener-Waterloo office. Of the space available in the new office, D2L has only occupied an estimated maximum of 70% of the space since inviting employees back in April 2023. D2L does not operate a dedicated server room at the new Kitchener-Waterloo headquarters, which yielded a significant reduction in electricity usage in FY24.

Scope 2 emissions are reported using the location-based method. D2L does not have a renewable electricity purchasing program and does not operate in grids where supplier-specific electricity factors are readily available. As such, for the purpose of dual reporting, market-based Scope 2 emissions can be considered identical to location-based totals. Decrease in emissions is due to office relocations in both Kitchener-Waterloo and Toronto. Whereas D2L occupied an 8,234 sq ft space in the old Toronto office occupied from 2019 to mid-2022, D2L occupies a 400 sq ft space in the new office.

Scope 3 emissions in FY24 include the employee commuting and purchased goods and services categories, whereas previous Scope 3 totals were limited to business air travel emissions. Employee commuting emissions include physical travel to and from office locations as well as home office teleworking emissions estimates for remote and hybrid employees. Purchased goods and services emissions currently reflect 30% of the company's supply chain, as measured by FY24 operational spend, with ongoing efforts to increase coverage of supply chain emissions in FY25. In FY24, our supply chain efforts focused on including upstream emissions from data / server vendors (AWS and Micro-soft), event venue rentals, workstation technology hardware and promotional products (swag).

Water: 1. Most data points on water consumption were estimated in part or in whole either because of water billing cycles, data availability or lack of separate meters. Water data was not available for our Australia and London, UK, office locations.
2. Winnipeg office relies on at least one water-cooled air conditioner, which causes an increase in water consumption in the summer months.
3. Toronto office numbers are based partially on data from 2022, as 2023 data from August–December was unavailable.
4. Available data reads as 90% less water used at D2L's previous office in Kitchener in 2021 and 2022 than in the company's new office in 2023. This is likely due to COVID-19 regulations restricting in-office work.

¹³ • EU: [451 Research \(2021\)](#) found AWS infrastructure to be 5x more energy-efficient than the average European enterprise data center.
• US: [451 Research \(2019\)](#) study found that AWS was 3.6x more energy-efficient than the median of U.S. enterprise data centers surveyed.
• Asia-Pacific region: [451 Research \(2021\)](#) study surveying organizations in Japan, South Korea, Singapore, Australia and India found that, on average, moving to the cloud is up to 5x more energy-efficient than using on-premises data centers.
¹⁴ Please see AWS' publicly available information on their environmental targets, [available online](#).

EVENT-SPECIFIC DATA

D2L's events allow us to create community among our customers, partners and employees so that we can continue to help our customers solve their toughest challenges, build new relationships and continue to learn together. Of these, our largest event is our annual conference, Fusion, which brings together over 1,000 partners, employees and customers. In FY24, we worked with external consultants to measure the impacts of Fusion.

HOW WE'RE WORKING TO REDUCE THIS IMPACT

Our Global Events team has been hard at work learning about the impacts of our events and what we can do to lower our impacts while still hitting our growth targets. Some of their initiatives in FY24 include:

- integrating sustainability into individual employee key performance metrics
- eliminating several swag items and increasingly selecting swag with sustainability criteria front of mind
- prioritizing sustainability awareness at Global Events through panel discussions and presentations
- making several panels and presentations at Fusion available virtually for guests who prefer not to fly
- requesting water stations at events and encouraging attendees to bring reusable water bottles

For smaller events:

- Working with host locations to divert leftover food from landfill
- Increasingly shifting to QR codes to share information to avoid paper

BUILDING POLICIES AND PROCEDURES

D2L has several policies geared at lowering our environmental impact and ensuring we are acting as responsible stewards of the environment.

- We have established D2L's first Environmental Sustainability Policy to ensure that environmental sustainability is considered in business decisions and considered together with other elements of our culture.
- We use an internal Supplier Code of Conduct to outline social and environmental criteria we expect from our partners.

Engaging Employees

Our employees are passionate about the planet. We have undertaken several initiatives this year to engage employees in environmental sustainability opportunities.

1. Sustainability Ambassadors:

This group of passionate employees lead change through role modeling and education. A few key successes this year include:

- Highlighting sustainable food choices to empower D2Lers to consider sustainability at home and at work through Slack communications, recipe sharing and hosting a lunch and learn.
- Influencing our leadership team to build a community garden at our HQ space. The garden is planned and ready to host teams for team-building activities and produce vegetables throughout the full garden season in 2024.
- Weekly educational posts on Slack to raise awareness and engage D2Lers in discussion on a variety of sustainability issues.
- Leading a local park cleanup.
- Developing a pilot Sustainability Widget in response to customer interest in finding ways to engage their students in on-campus sustainability.

2. Educational Opportunities:

Our People and Culture and Sustainability teams have created many opportunities for D2Lers to learn about how sustainability applies to their roles. Some examples include adding sustainability to onboarding training and external engagement opportunities like Night School.

3. Sustainability at the Office:

While many of our employees are fully remote, a sustainable office space is both important for decarbonization purposes and to signal the increasing importance of sustainability to employees. Some of the ways we aim to make our space more sustainable include:

- Reused furniture from our previous office space
- reusable cutlery, recycling and composting stations in kitchen spaces
- technology to moderate temperatures and optimize light use
- centralized document centers and double-sided printing
- Electric vehicle charging stations
- showers, lockers and bike storage and repair stations
- delivering pay stubs digitally and eliminating most business cards



FINDING ALTERNATIVES TO PROMOTIONAL GOODS

Each year, D2L hosts InFusion, an internal conference for team members across our technology, engineering and design teams to share ideas and learn from others. In FY24, our planning team continued their initiatives to reduce the impacts of event-related marketing swag.

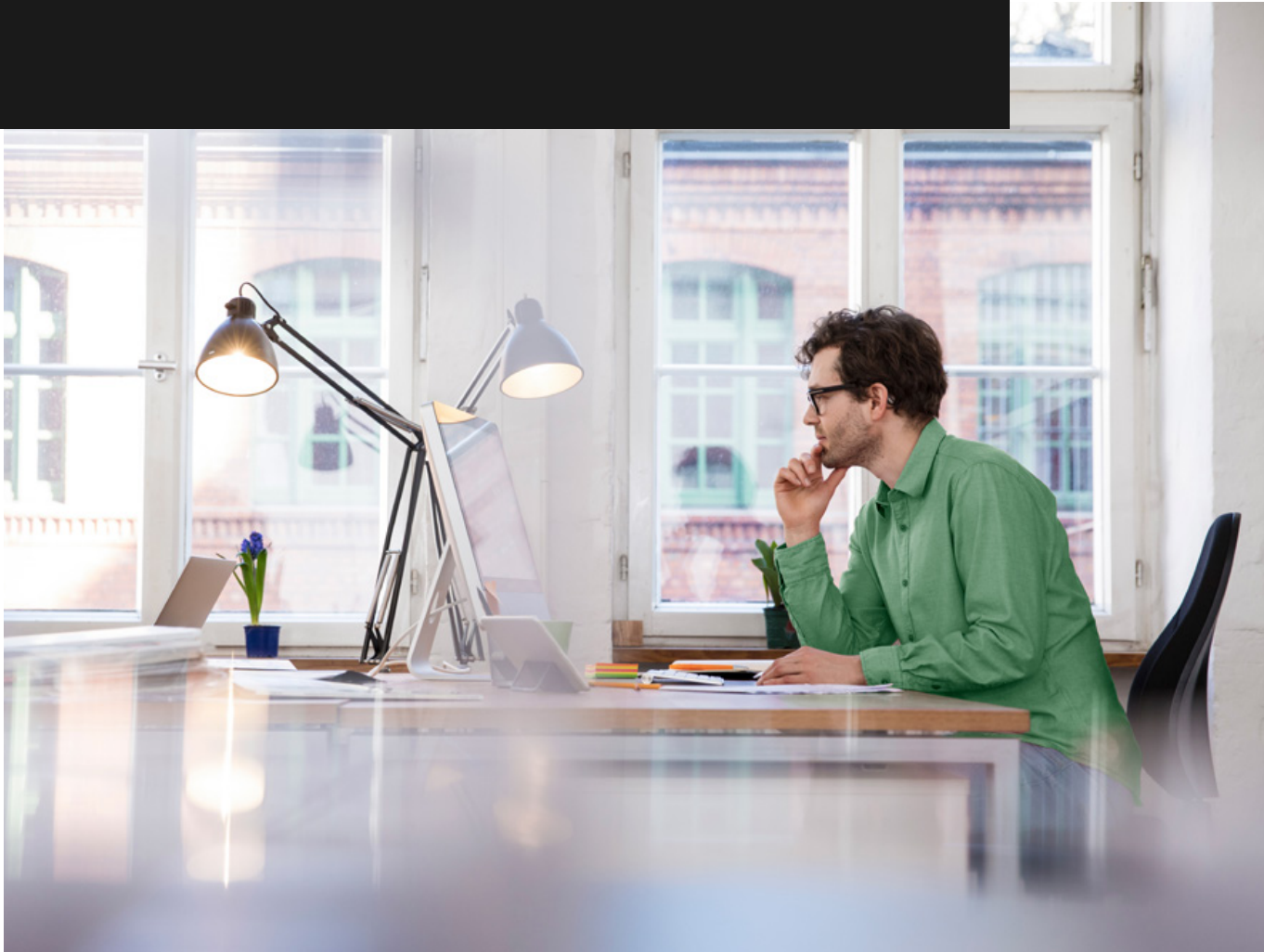
- Provided an explicit “opt-in” button for conference registrants to request swag.
- Localized gift options, as much as possible.
- Prioritized consumable gifts rather than material items.
- Donated remaining budget and funds derived from employees who opted out of their event gifts.

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 further evaluate the ways in which we can contribute to environmental sustainability and continue to work with our suppliers to emphasize sustainability throughout our supply chain.

08

Appendix



REPORTING SCOPE AND METHODOLOGY

This report is D2L Inc.'s (TSX: DTOL) second ESG Sustainability 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. We have included an inaugural reporting against the TCFD framework, omitting the Climate Scenario Analysis.

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 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 it 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 2024

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. 65 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. 66 in the Environment Section. All water withdrawn was consumed. Water data is drawn from our office spaces with the exception of our office in London, UK as data was not available.
	Discussion of the integration of environmental considerations into strategic planning for data center needs	Discussion	TC-SI-130a.3	See p. 52 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. 51–52 in the Data Privacy section.
	Number of users whose information is used for secondary purposes	Number	TC-SI-220a.2	See p. 51 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. 48–50 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	FY24		
				Foreign Nationals	3.99%	4.85%	6.08%	4.10%	
					Located Offshore	1.40%	1.31%	1.58%	1.08%
	Employee engagement as a percentage	Percentage	TC-SI-330a.2	See p. 58 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 ⁷	Percentage	TC-SI-330a.3	Percentage of gender representation for					
				FY21	FY22	FY23	FY24		
				Management	W - 23% M - 77%	W - 23% M - 77%	W - 25% M - 75%	W - 31% M - 69%	
				Technical	W - 22% M - 78%	W - 24% M - 76%	W - 25% M - 75%	W - 27% M - 73%	
				Other	W - 50% M - 50%	W - 53% M - 47%	W - 55% M - 45%	W - 53% M - 47%	
				Percentage of racial / ethnic representation for					
FY21				FY22	FY23	FY24			
Management				N/A	N/A	I - 23% NI - 77%	I - 25% NI - 75%		
Technical			I - 31% NI - 69%	I - 32% NI - 68%					
Other			I - 26% NI - 74%	I - 30% NI - 70%					
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. 52 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. 52 in the Service Reliability section and Data Security section and p. 29, 42, 46 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 1300 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 2023 - 31 January 2024 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. 6 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	Annual report, aligned with financial reporting period. For contact information, see p. 80 (last page of this report).
	2-4 Restatements of information	Please note the restatement of data under SASB TC-SI-330a.3. In FY23, we published the percentage of racial / ethnic representation for management as 14% Identifying, and 86% Non-Identifying, and stated that these numbers were for members of management from a Vice President level and up. In actuality, these data points were for members of management from a Senior Vice President level and up. The correct data points for VP and up for FY23 are updated in the table in the pages above.
	2-5 External assurance	No external assurance has been obtained. Board and Senior Leadership Team review the Sustainability Report prior to publication.
	2-6 Activities, value chain and other business relationships	AIF p. 9–27

GRI STANDARD	DISCLOSURE	LOCATION			
		FY21	FY22	FY23	FY24
GRI 2: GENERAL DISCLOSURES 2021	2-7 Employees	Type of 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%	Permanent: 95% Permanent: 1.2% Temporary: 1.6% Temporary: 0.2% Student: 1.9% Casual: 0.9%
		Gender W - 38% M - 62%	W - 41% M - 59%	W - 44% M - 56%	W - 43% M - 57%
	2-9 Governance structure and composition	See p. 15–18 in the Governance Section, and AIF p. 75–80			
	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. 16 in the Governance section, and AIF p. 75–80.			
	2-12 Role of the highest governance body in overseeing the management of impacts	See p. 12–18 in the Governance section, and our MIC for more details.			
	2-13 Delegation of responsibility for managing impacts	See p. 17 in the Governance section.			
	2-14 Role of the highest governance body in sustainability reporting	See p. 18 in the Governance section.			
	2-15 Conflicts of interest	AIF p. 81			
	2-16 Communication of critical concerns	AIF p. B-7			
	2-17 Collective knowledge of the highest governance body	See p. 15 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. 15 in the Governance section and p. 23–24 in the Materiality Matrix section.			
	2-24 Embedding policy commitments	See p. 15–20 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	See our AIF			
	2-29 Approach to stakeholder engagement	See p. 70–71 '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. 23–24 'Materiality Matrix'.			
	3-2 List of material topics	See p. 23–24 'Materiality Matrix'.			
GRI 201: ECONOMIC PERFORMANCE 2016	3-3 Management of material topics	See p. 23–24 'Materiality Matrix'.			
	201-1 Direct economic value generated and distributed	See p. 12 'Fiscal Year 2023 Highlights' and annual financial statements.			
	201-2 Financial implications and other risks and opportunities due to climate change	AIF p. 29			
	201-3 Defined benefit plan obligations and other retirement plans	See our annual financial statements. 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	FY24
		72%	71%	75%	70%
	201-4 Financial assistance received from government	As of January 31, 2024, 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. 54
	205-2 Communication and training about anti-corruption policies and procedures	See p. 15 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. 53–54 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	Please see our publicly filed financial documents.
GRI 302: ENERGY 2016	302-1 Energy consumption within the organization	See p. 65 in the Environment section.
	302-3 Energy intensity	See p. 65 in the Environment section.
GRI 305: EMISSIONS 2016	305-1 Direct (Scope 1) GHG emissions	See p. 66 in the Environment section.
	305-2 Energy indirect (Scope 2) GHG emissions	See p. 66 in the Environment section.
	305-3 Other indirect (Scope 3) GHG emissions	See p. 66 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. 67 in the Environment section.																									
GRI 401: EMPLOYMENT 2016	401-1 New employee hires and employee turnover	See People and Culture section																									
		New Employee Hires																									
		<table border="1"> <thead> <tr> <th>Data Type</th> <th>FY21</th> <th>FY22</th> <th>FY23</th> <th>FY24</th> </tr> </thead> <tbody> <tr> <td>Total</td> <td>281</td> <td>431</td> <td>316</td> <td>172</td> </tr> <tr> <td>Gender</td> <td>W - 42% M - 58%</td> <td>W - 52% M - 48%</td> <td>W - 41% M - 59%</td> <td>W - 45% M - 55%</td> </tr> <tr> <td>Age¹⁵</td> <td><30 - 33% 30-50 - 56% >50 - 11%</td> <td><30 - 40% 30-50 - 54% >50 - 6%</td> <td><30 - 40% 30-50 - 53% >50 - 7%</td> <td><30 - 34% 30-50 - 54% >50 - 11%</td> </tr> <tr> <td>Regions</td> <td>North America (NA)- 87% Rest of World (RoW) - 13%</td> <td>NA - 91% RoW - 10%</td> <td>NA - 84% RoW - 11%</td> <td>NA - 78% RoW - 22%</td> </tr> </tbody> </table>	Data Type	FY21	FY22	FY23	FY24	Total	281	431	316	172	Gender	W - 42% M - 58%	W - 52% M - 48%	W - 41% M - 59%	W - 45% M - 55%	Age¹⁵	<30 - 33% 30-50 - 56% >50 - 11%	<30 - 40% 30-50 - 54% >50 - 6%	<30 - 40% 30-50 - 53% >50 - 7%	<30 - 34% 30-50 - 54% >50 - 11%	Regions	North America (NA)- 87% Rest of World (RoW) - 13%	NA - 91% RoW - 10%	NA - 84% RoW - 11%	NA - 78% RoW - 22%
		Data Type	FY21	FY22	FY23	FY24																					
		Total	281	431	316	172																					
Gender	W - 42% M - 58%	W - 52% M - 48%	W - 41% M - 59%	W - 45% M - 55%																							
Age¹⁵	<30 - 33% 30-50 - 56% >50 - 11%	<30 - 40% 30-50 - 54% >50 - 6%	<30 - 40% 30-50 - 53% >50 - 7%	<30 - 34% 30-50 - 54% >50 - 11%																							
Regions	North America (NA)- 87% Rest of World (RoW) - 13%	NA - 91% RoW - 10%	NA - 84% RoW - 11%	NA - 78% RoW - 22%																							
Employee Turnover																											
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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. 58 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.																									
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GRI 403: OCCUPATIONAL HEALTH AND SAFETY 2018	403-1 Occupational health and safety management system	See p. 63 in the Empowering our People section.																									
	403-6 Promotion of worker health	See p. 58-59 in the Empowering our People section.																									

¹⁵ Percentages are rounded to the nearest whole number. The sum of these rounded percentages may not always equal 100%. This discrepancy is purely a result of the rounding process and does not indicate any error or inaccuracy in the underlying data.

¹⁶ Same as above.

GRI STANDARD	DISCLOSURE	LOCATION																																
GRI 404: TRAINING AND EDUCATION 2016	404-1 Average hours of training per year per employee	See p. 60 in the Empowering our People section.																																
	404-2 Programs for upgrading employee skills and transition assistance programs	See p. 59–60 in the Empowering our People section.																																
	404-3 Percentage of employees receiving regular performance and career development reviews	See p. 60 in the Empowering our People section.																																
GRI 405: DIVERSITY AND EQUAL OPPORTUNITY 2016	405-1 Diversity of governance bodies and employees	See p. 61 in the Empowering our People section and p. 16 in the Governance section.																																
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GRI 413: LOCAL COMMUNITIES 2016	413-1 Operations with local community engagement, impact assessments, and development programs	See p. 29-41 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. 20 in the Governance 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