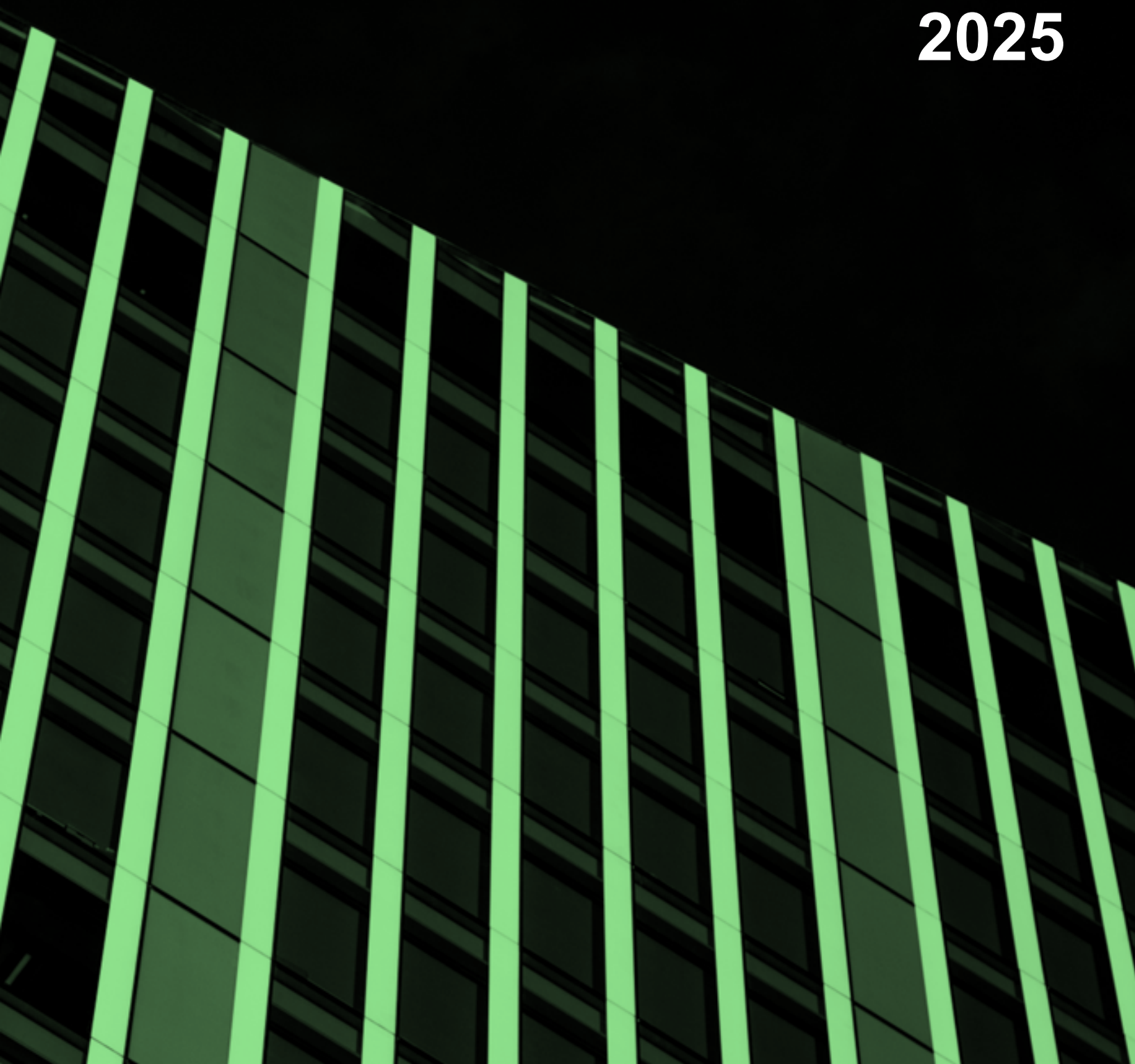


D2L

Modern Slavery Report 2025





Introduction

This report is made on behalf of D2L Family of Companies (“D2L”) pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada), the *Modern Slavery Act 2015* (United Kingdom) and the *Modern Slavery Act 2018* (Australia) (together, “**Modern Slavery Acts**”). For the purposes of this report, “**Modern Slavery**” includes, but is not limited to, forced or compulsory labor, slavery, servitude, child labor and human trafficking.

D2L confirms that no member of its family of companies engages in modern slavery and that it is reviewing its supply chain controls to ensure it is not supporting modern slavery or human trafficking.

D2L has taken the measures described in this report to ensure that modern slavery is not taking place in its business or any part of its supply chain.

Table of Contents

Introduction	1
About Us	2
Our Activities	2
Our Structure	2
Consultation	3
Our Risks	3
Actions Taken	4
Due Diligence	4
Procurement Procedures	4
Our Policies	5
Training	5
Effectiveness	5
Remediation	6
Approval and Attestation	6



About Us

D2L's mission is to transform the way the world learns. We deliver personalized, flexible and modern learning experiences for people of all ages. Our learning technology is powered by more than 25 years of expertise and a vision for the future of work and learning. We focus on creating a unique learner-centric platform, informed by learning science, that holds the capacity to increase adoption, retention, engagement, and learning outcomes.

Our Activities

Our core cloud-based learning innovation platform, Brightspace, serves three distinct markets: kindergarten to grade 12 schools ("K-12"), higher education, and corporate markets. Our technology is easy to use and accessible for people across these markets who use our platform for online learning, supporting learning in the classroom, and for professional development and training. D2L Brightspace Core functionality is extended through Lumi, our human-centered artificial intelligence ("AI") offering; Creator+, our easy-to-use authoring tools; Performance+, our advanced analytics package; Achievement+, which streamlines achievement reporting on learning outcomes; Course Merchant, our storefront for courses; and H5P, for building learning interactives.

Our learning technology leverages intelligent features like AI, smart workflow design and automation to help educators better understand the unique needs, activities, and performance of each learner, and integrates seamlessly with other technologies to enable our customers to deliver individualized and personalized learning programs at scale.

Our Structure

D2L Inc. is listed on the Toronto Stock Exchange (TSX: DTOL) and is incorporated under the laws of Ontario and is the principle governing body of the Reporting Subsidiaries, which consists of the following entities:

Canada

- **D2L Corporation**, a private company and a wholly owned subsidiary of D2L.
- **D2L Commerce Inc.**, a private company and a wholly owned subsidiary of D2L.

United Kingdom

- **D2L Europe Ltd.**, a private company limited by shares and a wholly owned subsidiary of D2L.
- **Connected Shopping Ltd.**, a private company limited by shares and a wholly owned subsidiary of D2L.



Australia

- **D2L Australia Pty Ltd**, a private company limited by shares and a wholly owned subsidiary of D2L.

D2L has subsidiaries outside Canada, the United Kingdom, and Australia. A full list of subsidiaries is available through D2L's Annual Information Form available on [D2L's Investor Relations website](#).

Consultation

To prepare this joint statement, we engaged with each of the reporting entities covered by this statement and consulted the entities we own or control. In addition, D2L Inc. engages in ongoing consultation and direct oversight to assess compliance and risk of modern slavery throughout the organization.

Our Risks

As part of D2L's initiative to identify and mitigate risk within its supply chain, D2L has conducted a supplier risk assessment to identify at-risk relationships. D2L does not manufacture goods or handle raw materials. Our supply chain consists of:

- Third-party providers of hosting services, data storage services, apps, content and add-ons for the D2L Brightspace platform
- Computer software, equipment and office supplies
- Sponsorships, marketing, and trade show services
- Consultancy services including call centres, third party development services
- Professional services from advisors such as background check services, law firms, accounting firms, and other professional services.

D2L's supply chains are primarily comprised of organizations operating in the North American and European markets and who employ skilled workers to perform services.

Overall, D2L has determined that the majority of its supply chain is low risk in terms of modern slavery, trafficking or forced labour measures. D2L recognizes that certain sectors of its supply chain are at a higher risk of modern slavery – such as the food and beverage industry, manufacturing for office equipment and supplies, and outsourced development services.



Actions Taken

For the period covering its most recent financial year ending January 31, 2025, D2L has taken the following steps towards confirming that modern slavery does not exist in any of its supply chains:

1. Due Diligence
2. Review of Procurement Procedures and Standard Contracting Terms
3. Raising Awareness through our Policies

Due Diligence

D2L strives to make ethical business choices when it comes to preventing modern slavery and human trafficking and will not knowingly support or deal with any business that engages in modern slavery or human trafficking.

As part of D2L's due diligence measures, the company has reviewed all active UK vendors within the past 12 months to confirm these vendors are not knowingly or negligently supporting modern slavery or human trafficking. After this review, suppliers in high-risk sectors without a published statement on modern slavery and human trafficking are being sent letters requesting confirmation that the supplier is taking steps to evaluate its business and supply chain and adopting measures to address modern slavery and human trafficking.

Procurement Procedures

All Australian and United Kingdom based vendors are sent a letter to confirm their compliance with modern slavery and human trafficking requirements including having done their own statements or reports. In addition, D2L is currently in the process of implementing a vendor management system which will include ongoing confirmations of compliance via an automated process.

On a go-forward basis, D2L will require high risk suppliers to provide contractual warranties that they do not engage in modern slavery or human trafficking.

D2L has made a policy decision, that if a supplier cannot demonstrate its commitment to anti-slavery or human trafficking obligations, D2L will assess whether it should continue doing business with that vendor.



Our Policies

Policy on Modern Slavery and Human Trafficking

It is our commitment to raise awareness in the organization, D2L has a published Policy on Modern Slavery and Human Trafficking in which all employees must comply. D2L will continue to raise awareness and educate its employees and supply chain through updates and communications about duties and responsibilities to prevent modern slavery and human trafficking.

Code of Business Conduct and Ethics

D2L Code of Business Conduct and Ethics (“Code”) specifically calls out that employees are required to operate in compliance with modern slavery/human trafficking laws. In addition, the Code includes a duty to report any violations of the Code as well as outlining the appropriate reporting venue.

Procurement Policy

D2L’s Procurement Policy requires that the environmental and social impact of any vendor purchases be assessed prior to engagement.

Whistleblower Policy

D2L’s Whistleblower Policy allows for anonymous reporting of any legal violations, including those related to modern slavery/human trafficking. The policy guarantees that all good faith submissions will be protected from retaliation.

Training

All employees are required to complete an annual training on D2L’s policies. New hires undergo training on the Code within 30 days of starting with D2L. D2L is exploring the possibility of implementing training on modern slavery/human trafficking specifically in the future.

Effectiveness

During this reporting period, our focus was to gain a better understanding of our modern slavery risks and how such risks may be present in our operations and supply chains. At this early stage, we are unable to adequately assess the effectiveness of measures we have undertaken. However, we have commenced and will continue to work on developing frameworks and processes to ensure we can review the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains.



Remediation

During this reporting period, to the knowledge of management and the Board no incidents of Modern Slavery have been reported in D2L. Therefore, remediation measures did not need to be taken to correct an incident of Modern Slavery or to compensate for loss of income to vulnerable families. If a situation of non-compliance is discovered or reported in the future, we will investigate and take the appropriate remedial measures to either cease, prevent or mitigate any adverse effects, and improve the enforcement of our policies in our supply chain.

Approval and Attestation

Principle Governing Body Approval

This joint report has been prepared by D2L Inc. in consultation with the senior management of each of the Reporting Subsidiaries. This joint report was approved by the board of D2L Inc. as the parent entity on September 10, 2025.

This statement is signed by John Baker in his role as the director of D2L Inc. on September 10, 2025.

Attestation

I, in the capacity of director, attest that I have reviewed the information contained in the report on behalf of the governing body of the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Modern Slavery Acts, for the reporting year listed within this report.

“John Baker”

John Baker

Director, CEO & Founder
D2L Inc.

I have the authority to bind D2L Inc.