

## Statement on Modern Slavery and Human Trafficking

The D2L Family of Companies ("D2L") has taken the measures described below to ensure that slavery and human trafficking is not taking place in its business or any part of its supply chain.

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.

D2L is a global provider of cloud based software that is used by customers in higher education, K-12, healthcare, government and the enterprise sector. D2L confirms that no member of its family of companies engages in modern slavery or human trafficking and that it is reviewing its supply chain controls to ensure it is not supporting modern slavery or human trafficking.

For the period covering its most recent financial year ending January 31, 2017, D2L has taken the following steps towards confirming that slavery and human trafficking does not exist in any of its supply chains:

- i. Supply Chain Assessment
- ii. Due Diligence
- iii. Review of Procurement Procedures and Standard Contracting Terms
- iv. Raising Awareness

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's supply chains consist of third party providers of hosting services, Apps, content and add-ons for the D2L Brightspace platform. D2L also sources marketing and consultancy services, call centres, third party development services, computer software and equipment, office supplies, and event facility and catering services.

Overall, D2L has determined that the majority of its supply chain is low risk in terms of trafficking or forced labour measures. The company's supply chains are primarily comprised of organizations operating in the North American and European markets and who employ skilled workers to perform services. D2L recognizes that certain sectors of its supply chain are at a higher risk of slavery and human trafficking – such as the food and beverage industry, manufacturing for office equipment and supplies, and outsourced development services.

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. Additionally, 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, to discontinue engagement with any supplier that cannot demonstrate its commitment to anti-slavery or human trafficking obligations.

To raise awareness in the organization, D2L has adopted and published a Policy on Modern Slavery and Human Trafficking and with 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.

D2L is committed to doing its part to develop an appropriate and effective response to prevent the exploitation and social injustices targeting the most vulnerable members of society. To this end, D2L will continue to scrutinize its compliance and revise its assessment approach to better realize its goal of increasing transparency and influencing continuous improvements in its business and supply chain. D2L has designated representatives within its organization to monitor and ensure compliance with the commitments set out in this Statement.

This statement will be reviewed and published annually. This Statement is for the financial year ended January 31, 2017.



John Baker  
President and Chief Executive Officer



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