

# Blackboard®

## Modern Slavery Act Statement

Blackboard is a global provider of education technology solutions. This statement is made pursuant to s.54 of the UK's Modern Slavery Act 2015, and sets out the steps Blackboard has taken or will take to ensure that no modern slavery or human trafficking is taking place in our supply chain or in any part of our business. Blackboard has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure the prevention of modern slavery.

### Purpose

Slavery is a criminal offense under the Modern Slavery Act 2015 (the "Act"). Modern slavery can occur in various forms, including servitude, forced or compulsory labor, and human trafficking, all of which involve the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. This Statement sets out the policy of Blackboard Inc. and its subsidiaries and affiliates (collectively, "Blackboard" or the "Company") with the goal of preventing any form of slavery from occurring within its business or supply chain. This policy's use of the term "modern slavery" has the meaning provided in the Act.

### Our Business and Our Supply Chains

Blackboard Inc. is the parent company of Blackboard (UK) Limited, which is based in London. Blackboard has other subsidiaries both in the US and around the world.

From time to time Blackboard engages vendors or suppliers to purchase goods and services. Blackboard has written contracts with its vendors. Many of our major hardware suppliers have modern slavery act policies in place.

### Steps for the Prevention of Modern Slavery

1. Blackboard is committed to ensuring transparency in our own business and tackling modern slavery in our supply chains, consistent with our disclosure obligations under the Act.
2. Our employees have an obligation to familiarize themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner that does not allow the occurrence of modern slavery.
3. The Procurement team will be trained to ensure they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.
4. Even though we do not control the conduct of individuals and organizations in our supply chains, the following practical steps may be implemented to comply with the Act.
  - a. Communicate our policy to our vendors/suppliers to promote their implementation of procedures to prevent modern slavery.
  - b. Include anti-slavery clauses in contracts with our vendors to confirm their adherence to this policy and solicit the right to audit their activities and relationships for any reason. Reserve the right to terminate the contract at any time should any instances of modern slavery come to light.
  - c. Conduct risk assessments, as appropriate, to determine which parts of our business and which of our vendors are most at risk of modern slavery. If any parts of the business/vendors are at material risk of modern slavery, we will introduce a pre-screening and self-reporting system for such suppliers and a training program if necessary.
5. Ethics Hotline: We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
6. Code of Ethics and Business Conduct: Our Code sets out the manner in which we behave as an organization and how we expect employees and vendors to act.

## **Due Diligence Processes for Slavery and Human Trafficking**

As part of our initiative to identify and mitigate risk Blackboard will work, as appropriate, to gather information from certain vendors and resellers to confirm compliance with the Act.

## **Reporting Modern Slavery or Human Trafficking**

A Blackboard employee or an employee of a vendor/supplier may raise a concern through our ethics hotline if:

- S/he suspects that a person acting on behalf of the Company or one of our businesses is seeking to exploit another person in a way that could amount to modern slavery;
- S/he suspects that a person acting on behalf of one of our suppliers is seeking to exploit another in a way that could amount to modern slavery;
- S/he has been approached by someone acting on behalf of the Company or one of our businesses who has invited him/her to participate in acts that could result in violations of the Act;
- S/he has a good faith belief that a person acting on behalf of the Company or one of its businesses or suppliers is preparing to commit, is committing, or has committed an act inconsistent with the requirements of the Modern Slavery Act 2015.

If s/he knows of or suspects a violation of this Statement, s/he has an obligation to immediately report it to his/her manager, the Legal Department, or the ethics hotline. Notwithstanding the preceding sentence, Blackboard employees located outside the U.S. in countries that prohibit requiring employees to make such reports are encouraged to report such violations but are not required to do so. Once a report is received, Blackboard will investigate it promptly to the extent appropriate. Blackboard expects all employees to cooperate in investigations fully and candidly. Blackboard will take corrective action, as appropriate, based on the findings of the investigation. Blackboard's Compliance Committee will be informed of any confirmed report of a modern slavery offense.

## **Safeguards**

The Company will investigate concerns raised as appropriate given the circumstances. If a concern involves an employee of a vendor/supplier, the vendor/supplier will be given time to investigate if applicable. If Blackboard makes a reasonable conclusion that a violation has occurred, it will handle as appropriate, including but not limited to disciplinary action up to and including termination of employment (if an employee) or termination of contract (if vendor/supplier).

## **Responsibility for the Policy**

Ultimate responsibility for implementing these procedures lies with the Company's leadership. Team members of all levels are responsible for reporting any knowledge of suspicion of activity that may be related to any form of modern slavery.

## **Distribution/Posting of Statement**

This Statement has been approved by the Board of Directors of Blackboard (UK) Ltd. and the Compliance Committee. Blackboard will post this Statement on its website and intranet, and ensure that all current employees and new hires have access to it. Blackboard will also include relevant language in its agreements with applicable vendors and suppliers going forward. This Statement will be updated as appropriate.

---

Bill Ballhaus, President, CEO, and Chair  
Blackboard Inc.

July 2017