

Public Policy and Political Contributions

Public Policy

In all jurisdictions where TD operates, we take an interest in major public policy issues that may impact our business, communities and society. These include issues identified in our annual materiality analysis, such as tax, financial access and inclusion, and affordable housing.

Operating in a highly regulated industry, TD is especially affected by changes in financial services regulations and policies, and we are naturally concerned about building a healthy, sustainable financial marketplace. We are committed to being transparent about our public policy interactions and political contributions, with all of these activities guided by various internal policies and procedures. In addition, the Corporate Governance Committee of the Board oversees the bank's corporate responsibility strategy and management of the principal risks affecting the bank's businesses, including reputational risk, and receives regular reports that would include significant developments arising out of TD's public policy interactions.

TD engages in public policy matters in a variety of ways:

- We monitor government activity, upcoming legislation and regulatory developments to keep abreast of relevant issues.
- We dialogue with elected officials, public servants, regulators and advocacy organizations to engage them on TD's viewpoints.
- We participate in relevant policy development processes (e.g., public/industry consultations) by offering constructive ideas and expertise, with the aim of shaping sound policy solutions.

Government Relations in Canada

In Canada, TD's Government Relations group coordinates the bank's dialogue with politicians and public servants, as well as many of the bank's relationships with industry associations and other advocacy organizations. TD's Regulatory Relations group coordinates the bank's contact with both Canadian regulators and regulators in foreign jurisdictions other than the U.S.

The majority of TD's interactions take place with the federal government, which has jurisdiction over all banking activities and many other financial services. TD's Lobbying Registration Compliance Policy complies with all federal lobbyist-reporting requirements and we report all activities to the Office of the Commissioner of Lobbying, as required.

Government Relations in the U.S.

In the U.S., the Regulatory Relationships and Government Affairs team manages the bank's contact with regulators, elected officials and other government employees at the federal, state and local levels. In addition, the team coordinates the bank's relationships with key trade associations.

TD Bank complies with all reporting requirements related to its interactions with government officials and with all other laws, rules and regulations that govern such interactions. We have a comprehensive Gifts and Entertainment Policy and we provide in-depth ethics training to employees who interact with government officials.

Relevant TD policies

Lobbying Registration Compliance Policy (internal)

Code of Conduct and Ethics (Section K)

Anti-Bribery and Anti-Corruption Policy

Gifts & Entertainment Policy (U.S.)



Public Policy and Political Contributions (continued)

Key public policy positions in 2018

ISSUE	AUDIENCE	KEY DEVELOPMENTS AND TD'S POSITIONS/ACTIVITIES
Regulatory Changes		
Implementation of the Dodd-Frank Act	U.S. Congress and regulators	TD continued to participate in consultation processes related to implementation of the Dodd-Frank Act.
Consumer/Economic Issues		
Payments	Government of Canada	TD is engaging with Payments Canada on an initiative to modernize the systems and rules that are essential to Canada's payments ecosystem.
Cybersecurity	Government of Canada	TD is engaging with the highest levels of government on a comprehensive cyber security strategy to combat cyber threats to the financial services industry.
Bank Act 2019 Review	Government of Canada	TD is working through the Canadian Bankers Association on the provisions relating to permitted activities and investments.
Anti-Money Laundering (AML)	Government of Canada	TD is engaging with Finance Canada on proposed changes to AML regulations to better improve measures to prevent money-laundering and terrorist financing.
Federal Consumer Protection Framework	Government of Canada	TD is working through the Canadian Bankers Association regarding enhancements to consumer protection rules, with a view to providing stability and consumer confidence in the financial services industry
Open Banking	Government of Canada	TD is working with the industry to provide input on the government consultation on Open Banking.
Pay Equity	Government of Canada	TD was supportive of the Government's Pay Equity Act which will apply to employees of the federal government and federally regulated institutions, including the banks.



Public Policy and Political Contributions (continued)

Political Contributions in 2018

Canada

In 2018, TD's political contributions were minimal in Canada. TD donated to both governing and official opposition parties in the provinces that allow corporate donations. Currently, six provinces do not allow political donations – nor are they permitted at the federal level. Our contributions have no political bias, are all on public record and can be accessed at the websites of provincial election offices.

	2018	2017	2016
Federal	n/a	n/a	n/a
Provincial	\$34,000	\$70,250	\$184,235
Municipal	-	\$200	\$300
TOTAL	\$34,000	\$70,450	\$184,535

U.S.

Federal law in the U.S. prohibits corporations, including national banks, from making political contributions to candidates for federal, state or local office. Contributions are allowed, however, from separate segregated funds established by national banks and other corporations. Such funds are known as political action committees or PACs. There are more than 4,000 active PACs in the U.S.

TD Bank has a federal political action committee, established in August 2011, that allows eligible, interested employees to make voluntary personal donations to candidates for federal office who support a strong financial services sector and sound economic policies. TD PAC is non-partisan and funded solely by voluntary contributions from eligible TD employees, facilitated through a voluntary payroll deduction system established by TD Bank.

All contributions from the PAC to federal candidates are reported to the Federal Election Commission and are a matter of public record. Employee contributions to TD PAC that aggregate to \$200 or more each year are reported as part of the public record. More information about TD PAC may be found on the Federal Election Commission database. A board of directors operating according to its articles of association governs TD PAC. This ensures accountability for proper administration and operation of the PAC and reflects the importance of and TD's commitment to strong governance.

During 2018, TD Bank N.A. PAC contributed \$186,500 to 54 U.S. House and U.S. Senate candidates of both major political parties and two financial services industry federal PACs. TD PAC makes political contributions that are allowed by federal law and that are consistent with the bank's strict guidelines for public policy activities and advocacy. No contributions are made to gain an unfair or inappropriate advantage. TD Bank does not independently advocate the election or defeat of specific candidates for federal office.

International

TD did not make any political contributions in international jurisdictions.

