

TD Bank Group: Statement on Human Rights

Introduction

In all of our operations and across our businesses, TD is committed to supporting and respecting the protection of human rights. TD understands the important role that it plays in respecting the human rights of our employees, customers, and the communities in which we operate. This Statement on Human Rights presents our current approach to fulfilling our commitment.

TD's primary businesses are conducted in countries that are governed by strong legal and human rights regulations. We comply with all human rights-related laws in the countries in which we operate. We also share the values reflected in international proclamations about human rights, such as the Universal Declaration of Human Rights.

In addition, we recognize the framework established by the United Nations Guiding Principles on Business and Human Rights (UNGP), which sets out the corporate responsibility to respect human rights. Since 2018, we have been undertaking a review of current practices and procedures and are working towards integrating the UNGP across the bank. We intend to update this Human Rights Statement as necessary to show our progress.

Our Approach

TD has various policies, standards and guidelines that drive our commitment to support and respect human rights.

TD's [Code of Conduct and Ethics](#) (the "Code") establishes the standards that govern the way we deal with our colleagues, customers, shareholders, governments, regulators, suppliers, competitors, the media and the public at large. Complying with the Code is part of the terms and conditions of employment with TD. As a responsible business enterprise and corporate citizen, TD is committed to conducting its affairs to the highest standards of ethics, integrity, honesty, fairness and professionalism. Every employee and member of the Board of Directors of TD is expected and required to assess every business decision and every action on behalf of the organization in light of whether it is right, legal, fair and within our risk appetite. This applies at all levels of the organization, from major decisions made by the Board to day-to-day business transactions.

Customers:

We abide by all legal and regulatory requirements governing the provision of financial services to our customers and strive to deliver exceptional customer service free from discrimination and harassment.

As part of our commitment under the Code, and in compliance with applicable laws, we offer our products and services without regard to any basis protected by law including, but not limited to, race, colour, religion, national origin, sex, sexual orientation, gender identity or expression, marital status and disability. In addition, TD's Respectful Workplace Policy articulates our commitment to provide an environment free from any form of harassment and discrimination, where every customer and client is treated with dignity and respect.

We recognize that access to banking is a critical element for social and economic progress. We continue to remove barriers and help make banking more accessible and inclusive, particularly for vulnerable and underserved populations in the financial system. Through our wide variety of products and services, and by supporting community organizations, we aim to equip our customers with the tools to better protect their finances now and in the future.

TD also has established processes and procedures to address customer concerns. Our three-step process for customer problem resolution, in which concerns can be escalated to the impartial TD Office of the Ombudsman in Canada, as well as our Chairman's Service Center in the U.S., helps ensure that complaints are taken seriously and responded to in a timely manner.

Colleagues:

At TD, we are committed to providing our people with an inclusive environment, an ethical work culture and meaningful work standards and policies. Part of this commitment includes abiding by and in many cases exceeding all applicable labour laws and standards addressing issues such as equal pay, hours of work and child labour.

TD's Respectful Workplace Policy articulates our commitment to provide a work environment free from any form of harassment and discrimination, where every employee and third-party worker is treated with dignity and respect.

We also strive to cultivate a service-oriented, barrier-free and inclusive culture that attracts, invests in and promotes all talent, reflecting the diverse communities we serve. We believe the true essence of Diversity and Inclusion is to provide a safe and productive environment where every individual feels comfortable bringing their whole self to work.

TD provides training to its employees about relevant human rights issues through various programs, including diversity and inclusion training.

Our employees also have several channels through which they can comfortably and safely raise their concerns directly within the organization. TD's [Whistleblower Hotline](#) provides a confidential and anonymous reporting channel to employees, customers, third-party workers and members of the public to report concerns they may have regarding TD without fear of retaliation; they can also report allegations of retaliation for having reported matters in good faith. TD's Whistleblower Hotline is hosted by a third party and is independently managed within TD. TD employees may also contact the Employee Ombudsman (known as the Between Us program).

Business:

While reaching our business goals is critical to TD's success, how we achieve them is equally important. That's why our actions are subject to a number of internal policies, standards and guidelines.



TD Bank Group: Statement on Human Rights (continued)

TD has adopted policies with respect to Anti-Money Laundering and Anti-Terrorist Financing (AML/ATF), and Anti-Bribery and Anti-Corruption to help detect and deter the use of TD products and services for money-laundering and terrorist-financing activities, and to provide principles of conduct to help deter and detect bribery and corruption activities. Additionally, TD's Economic Sanctions Policy supports foreign policy goals including counterterrorism and the promotion of democracy and human rights.

We also have implemented processes within our investment and lending business that support adherence to human rights principles, including:

- We manage environmental and social risk based on a life-cycle approach that begins before our formal engagement with a client and continues throughout our relationship. TD's Non-Retail Environmental and Social Credit Risk Process for Non-Retail Credit Business Lines governs our processes for assessing risk and contains a set of due diligence tools that are applied to all nonretail lending activities, which include general-corporate-purpose, project and fixed-asset financing.
- TD has developed a list of prohibited policies based on environmental and social risks, including those related to human rights. For example, TD does not finance deals that directly relate to the trade in or manufacturing of material for nuclear, chemical or biological weapons or for land mines or cluster bombs, and lending deals that are directly related to the mining of conflict minerals.
- As a signatory to the Equator Principles since 2007, TD follows a structured approach to lending, using a comprehensive set of tools and guidance documents so that EP deals are identified and categorized appropriately.
- TD Asset Management has been a signatory of the UN Principles for Responsible Investing (UN PRI) since 2009.

Suppliers:

TD is committed to source products and services from suppliers who respect human rights, ethics and the environment and have responsible policies and practices. TD's Supplier Code of Conduct reflects and frames the values and standards that TD expects suppliers and their subcontractors to adhere to when engaged in business with TD.

TD extends its responsible procurement agenda further into the supply chain by applying enhanced due diligence to sourcing products and services when social, ethical, environmental and geographical factors suggest higher risk.

We have designed our North American Supplier Diversity Program to promote a level playing field and encourage the inclusion of women, visible minorities, Indigenous Peoples, the LGBTQ2+ community, people with disabilities, veterans and other diverse groups in our procurement selection process.

Communities:

At TD, we value and respect the diverse views held by our customers, shareholders, employees and community partners. We interact with several stakeholder groups on a daily and/or

weekly basis, responding to the issues and concerns brought to our attention. As our vision is to Be the Better Bank, it's critical that we not only hear what stakeholders are saying, but also respond and seek to improve.

We engage proactively with our stakeholders, which enables us to have ongoing dialogue with investors, industry associations, Non-Governmental Organizations (NGOs), and environmental, Indigenous Peoples and community interest groups. As part of our commitment to transparency, we provide annual reporting on stakeholder engagements and dialogues held with various groups.

TD has a longstanding commitment to respect the rights of Indigenous Peoples within North America. The principle of Free, Prior and Informed Consent (FPIC) refers to the rights of Indigenous populations to participate in decisions affecting their lands, resources, livelihoods and communities, particularly relating to natural resource development. This principle is enshrined in the United Nations Declaration on the Rights of Indigenous Peoples. We continue to work to develop and promote understanding of FPIC and its practical application in the responsible development of natural resources. Our commitments are:

- To incorporate assessment of our clients' policies, practices and performance relating to FPIC when relevant as part of TD's Environmental and Social Credit Risk Policy for Non-Retail Lending.
- To actively support the development and dissemination of good practices for the practical implementation of FPIC. We will do this by working with diverse multi-stakeholder groups and by providing objective economic information to support solutions-based dialogue and informed public policy decisions.

Our Approach to Human Rights Governance

At TD, ongoing monitoring of human rights performance is provided through established feedback channels. In 2019, we also established an ESG working committee with cross-business representation to monitor emerging ESG topics. The committee's mandate includes increasing knowledge across various functions on emerging environmental and social risks to help coordinate our assessment and response. Any significant issues are raised at the Corporate Citizenship Council (CCC) and, when necessary, escalated to the Reputational Risk Committee.

This Statement on Human Rights has received approval from senior executives. In addition, TD publishes an annual statement on our efforts to combat modern slavery in compliance with the UK Modern Slavery Act (2015) that is approved by the Board of Directors and signed by our CEO.

We engage with a variety of stakeholders on human rights-related issues, and we report on our progress in our annual ESG Report and on our website: www.td.com/esg.

