



2022 Global Reporting Initiative (GRI) Index

TD has referred to the [Global Reporting Initiative](#) framework for sustainability reporting since 2007.

Legend:

- AR: [TD's 2022 Annual Report](#)
- PC: [TD's 2023 Proxy Circular](#)
- ESG Report: [TD's 2022 ESG Report](#)
- CAR: [TD's 2022 Climate Action Plan: Report on Progress and Update on TCFD](#)
- PAS: [TD's 2022 Public Accountability Statement](#)
- TDRC Report: [2022 TD Ready Commitment Report](#)

Disclosure	References and Responses
GRI 1: Foundation 2021	
Provide a statement of use	TD Bank Group has reported in accordance with the GRI Standards for the period November 1, 2021 to October 31, 2022.
GRI 2: General Disclosures 2021	
The Organization and its Reporting Practices	
2-1 Organizational details	Toronto-Dominion Bank and its subsidiaries are collectively known as TD Bank Group (“TD”, “the Bank”) TD is chartered under the Bank Act (Canada). It was formed on February 1st, 1955 through the amalgamation of The Bank of Toronto, chartered in 1855, and The Dominion Bank, chartered in 1869. TD trades under the symbol ‘TD’ on the Toronto and New York Stock Exchanges. Headquarters: Toronto, Canada Countries of operations: AR page 5, AR page 221 Information on Subsidiaries.
2-2 Entities included in the organization’s sustainability reporting	TD’s ESG Report (page 4) encompasses all of TD’s wholly owned operations and activities. AR pages 132–137 for Management’s Responsibility for Financial Information and Assurance of Financial Statements. TD’s consolidated financial statements encompasses The Toronto-Dominion Bank and its subsidiaries. AR page 221 Information on Subsidiaries.
2-3 Reporting period, frequency and contact point	TD publishes its ESG Report and financial statements on an annual cycle based on its fiscal year. TD’s 2022 ESG Report is for the reporting period November 1, 2021, to October 31, 2022, and was published March 16, 2023. Email address for questions about TD’s ESG Reporting and performance: tdreadycommitment@td.com
2-4 Restatements of information	Restatements of information and reasoning are provided in the text and footnotes of the ESG Report .



Disclosure	References and Responses
<p>2-5 External assurance</p>	<p>Ernst & Young LLP performed various assurance engagements for a selection of TD's ESG disclosures. Ernst and Young LLP is TD's sole independent external financial auditor. The Audit Committee is accountable for supervising the quality and integrity of the Bank's financial reporting and compliance requirements.</p> <p>2022 Assurance Statement for ESG Metrics, Greenhouse Gas Emissions and Carbon Neutral Schedule</p> <p>2022 Assurance Statement for TD Sustainability Bond (2020) Issuance – Use of Proceeds</p> <p>2022 Assurance Statement for TD Green Bond (2021) Issuance – Use of Proceeds</p>
<p>Activities and Workers</p>	
<p>2-6 Activities, value chain and other business relationships</p>	<p>AR page 20 Corporate Overview and page 32 Business Focus</p> <p>AR pages 34–50 Business Segment analyses</p> <p>ESG Report page 60 Responsible Sourcing</p> <p>AR page 20 Significant Events and Pending Acquisitions</p>
<p>2-7 Employees</p>	<p>ESG Report pages 86–88 Diversity and Inclusion</p> <p>ESG Report pages 89-92 Colleague Development, Retention and Well-being</p>
<p>2-8 Workers who are not employees</p>	<p>ESG Report page 89 Employee by Contract Type</p>
<p>Governance</p>	
<p>2-9 Governance structure and composition</p>	<p>PC pages 94–115 Schedule A, Corporate Governance</p> <p>ESG Report pages 19–22 Corporate Governance and Integrity</p> <p>PC pages 12–22 for more information on Board composition and competency</p> <p>Corporate Governance Structure</p> <p>Corporate Governance: Committees of the Board</p>
<p>2-10 Nomination and selection of the highest governance body</p>	<p>PC pages 94–115 Schedule A, Corporate Governance</p>
<p>2-11 Chair of the highest governance body</p>	<p>PC page 95 TD's Chair of the Board is independent.</p>
<p>2-12 Role of the highest governance body in overseeing the management of impacts</p>	<p>ESG Report pages 19–22 Corporate Governance and Integrity</p> <p>ESG Report page 15 Engaging Our Stakeholders and Prioritizing TD's Top ESG Topics</p> <p>ESG Report page 65 How We Listen to Stakeholders</p> <p>Corporate Governance Committee Charter</p> <p>AR pages 113–114 Environmental and Social Risk</p> <p>PC pages 29–30 Board Engagement on ESG Matters</p> <p>PC pages 94–115 Schedule A, Corporate Governance</p>




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<p>2-13 Delegation of responsibility for managing impacts</p>	<p>AR pages pages 82–114 Managing Risk (see Environmental and Social Risk enclosed)</p> <p>CAR pages 9–13</p> <p>PC pages 94–115 Schedule A, Corporate Governance</p> <p>Risk Committee Charter</p>
<p>2-14 Role of the highest governance body in sustainability reporting</p>	<p>TD’s CEO approves the ESG Report.</p> <p>Corporate Governance Committee Charter</p> <p>ESG Reporting Details page 1 Details of TD’s Materiality Assessment Process</p>
<p>2-15 Conflicts of interest</p>	<p>PC pages 94–115 Schedule A, Corporate Governance (see Director Conflicts of Interest enclosed)</p> <p>PC pages 13–20 Director Profiles</p> <p>Corporate Governance Committee Charter</p>
<p>2-16 Communication of critical concerns</p>	<p>Shareholders, employees, and other interested parties may communicate with the Board of Directors through the Board Chair.</p> <p>PC page 116</p> <p>AR page 225 Shareholder and Investor Information</p> <p>Corporate Governance Committee Charter</p>
<p>2-17 Collective knowledge of the highest governance body</p>	<p>ESG Report pages 21–22 Engaging on Environmental and Social (E&S) Matters</p> <p>ESG Report page 3 Performance Highlights for Investors (see Governance)</p> <p>PC pages 29–30 Board Engagement on ESG Matters</p> <p>CAR page 10 Board of Directors Oversight</p>
<p>2-18 Evaluation of the performance of the highest governance body</p>	<p>PC pages 38–48 Compensation Discussion and Analysis and Approach to Executive Compensation</p> <p>PC pages 49–63 2022 Performance and Compensation (see also business performance calculations enclosed)</p>
<p>2-19 Remuneration policies</p>	<p>PC pages 38–48 Compensation Discussion and Analysis and Approach to Executive Compensation</p> <p>PC pages 49–63 2022 Performance and Compensation</p> <p>PC pages 64–79 Alignment to Financial Stability Board Principles and Risk Management Practices</p>
<p>2-20 Process to determine remuneration</p>	<p>PC pages 38–48 Compensation Discussion and Analysis and Approach to Executive Compensation</p> <p>PC pages 49–63 2022 Performance and Compensation</p> <p>PC pages 64–79 Alignment to Financial Stability Board Principles and Risk Management Practices</p> <p>At TD’s Annual General Meeting, shareholders may cast a non-binding advisory vote on executive compensation. The results can be found on our website.</p>
<p>2-21 Annual total compensation ratio</p>	<p>Reason for omission: Confidentiality constraints.</p> <p>This information is considered confidential.</p>



Disclosure	References and Responses
Strategies, Policies and Practices	
2-22 Statement on sustainable development strategy	<p>ESG Report pages 5–6 A Message from our Leadership</p> <p>CAR page 3 Messages From Our Leadership</p>
2-23 Policy commitments	<p>TD Code of Conduct and Ethics</p> <p>TD Bank Group Statement on Human Rights</p> <p>TD Bank Group Slavery and Human Trafficking Statement</p> <p>Supplier Code of Conduct</p> <p>TD Bank Statement on AML/ATF/Sanctions</p> <p>TD's Statement on Anti-Corruption</p> <p>Codes of Conduct and Public Commitments</p> <p>ESG Report pages 19–22 Corporate Governance and Integrity</p> <p>Who we are</p>
2-24 Embedding policy commitments	<p>CAR pages 9–13 TD's Approach to Climate Governance, Board of Directors Oversight, and Management Oversight</p> <p>ESG Report pages 19–22 Corporate Governance and Integrity (see Our Approach, Our Commitment to Human Rights, and Our Approach in Action enclosed)</p> <p>ESG Report pages 9–10 ESG Highlights Across Our Business (see Corporate enclosed for information on supplier attestation)</p> <p>ESG Report page 71 for percentage of eligible employees who completed the Code of Conduct and Ethics and anti-money laundering training</p>
2-25 Processes to remediate negative impacts	<p>ESG Report page 19 Promoting Responsible Conduct (see Between Us: Employee Ombudsman Office)</p> <p>ESG Report page 57 Employee Relations (see Employee Complaint Resolution Process)</p> <p>TD Conduct and Ethics Hotline, managed by an independent third party</p> <p>TD Code of Conduct and Ethics</p> <p>Senior Customer Complaints Office</p>
2-26 Mechanisms for seeking advice and raising concerns	<p>ESG Report page 19 Promoting Responsible Conduct (see Between Us: Employee Ombudsman Office)</p> <p>ESG Report page 57 Employee Relations (see Employee Complaint Resolution Process)</p> <p>TD Conduct and Ethics Hotline, managed by an independent third party</p>
2-27 Compliance with laws and regulations	<p>ESG Report page 71 Responsible Conduct and Compliance Incident Reporting</p>
2-28 Membership associations	<p>CAR pages 23–24 Our Engagement Strategy</p> <p>ESG Reporting Details pages 2–4 Environmental, Social and Governance Stakeholder Engagement</p>



Disclosure	References and Responses
Stakeholder Engagement	
2-29 Approach to stakeholder engagement	<p>ESG Report page 15 Engaging Our Stakeholders and Prioritizing TD's Top ESG Topics</p> <p>ESG Report page 65 How We Listen to Stakeholders</p> <p>ESG Reporting Details pages 2–4 Environmental, Social and Governance Stakeholder Engagement</p>
2-30 Collective bargaining agreements	TD General Insurance has a long-established bargaining unit approximately 0.14% of our total employee population, represented by Teamsters Union at one of our Montreal locations.
GRI 3: Material Topics 2021	
3-1 Process to determine material topics	<p>ESG Reporting Details page 1 Details of TD's Materiality Assessment Process</p> <p>ESG Report page 15 Engaging Our Stakeholders and Prioritizing TD's Top ESG Topics</p>
3-2 List of material topics	<p>ESG Report page 15 Engaging Our Stakeholders and Prioritizing TD's Top ESG Topics. We consider our material topics to be those that are identified as core focus areas and key impact areas of the materiality matrix. Reference response to 3-3.</p> <p>TD's material topics align to the following GRI 3: Material Topics 2021; GRI 201: Economic Performance 2016; GRI 203: Indirect Economic Impacts 2016; GRI 205: Anti-corruption 2016; GRI 302: Energy 2016; GRI 305: Emissions 2016; GRI 401: Employment 2016; GRI 403: Occupational Health and Safety 2018; GRI 404: Training and Education 2016; GRI 405: Diversity and Equal Opportunity 2016; GRI 413: Local Communities 2016; GRI 417: Marketing and Labeling 2016; GRI 418: Customer Privacy 2016</p>
3-3 Management of material topics	<p>TD addresses the nature and impact, and management of its material topics throughout its published ESG Reporting documents; see references given below for each of TD's material topics (in alphabetical order).</p> <ol style="list-style-type: none"> Climate Change: ESG Report pages 40–42 Climate Change; CAR Colleague Health and Well-being: ESG Report pages 56–59 Colleague Development, Retention and Well-being Community Well-being: ESG Report pages 48–49 TD Pathways to Economic Inclusion; TDRC Report Consumer Protection: ESG Report pages 63–64 Product and Service Responsibility and pages 61–62 Customer Experience Corporate Governance: ESG Report pages 19–22 Corporate Governance and Integrity Customer Experience: ESG Report pages 61–62 Customer Experience Data Privacy: ESG Report pages 25–26 Data Security and Privacy Data Security: ESG Report pages 25–26 Data Security and Privacy Diversity and Inclusion: ESG Report pages 53–55 Diversity and Inclusion Environmental and Social Governance and Risk Management: ESG Report pages 23–24 Environmental and Social Risk Management and pages 19–22 Corporate Governance and Integrity Ethics and Integrity: ESG Report pages 19–22 Corporate Governance and Integrity Financial Access and Inclusion: ESG Report pages 51–52 Financial Access and Inclusion Human Rights: ESG Report pages 19–22 Corporate Governance and Integrity (see also locations throughout the report with this icon ) Sustainable Finance: ESG Report pages 27–37 Sustainable Finance Talent Attraction, Development, and Retention: ESG Report pages 56–59 Colleague Development, Retention and Well-being and pages 53–55 Diversity and Inclusion



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GRI Topic Standards	
GRI 201 Economic Performance 2016	
201-2 Financial implications and other risks and opportunities due to climate change	<p>ESG Report pages 40–42 Climate Change</p> <p>CDP Climate Change Questionnaire 2022</p> <p>Environmental and Social Risk Process</p> <p>AR pages 80, 113–114 Environmental and Social Risk</p> <p>CAR</p>
GRI 203: Indirect Economic Impacts 2016	
203-1 Infrastructure investments and services supported	<p>TDRC Report for examples of initiatives TD funded under the TD Ready Commitment</p> <p>ESG Report pages 48–49 TD Pathways to Economic Inclusion</p> <p>ESG Report page 50 Highlight on Affordable Housing</p> <p>ESG Report pages 27–37 Sustainable Finance</p> <p>ESG Report pages 43–45 Responsible Resource Use and Nature-Based Solutions (see What We Did in 2022 enclosed)</p> <p>TD Bank Group's Low-Carbon Economy Progress Report</p> <p>2022 TD Sustainability Bond (2020) Issuance – Use of Proceeds</p> <p>2022 TD Green Bond (2021) Issuance – Use of Proceeds</p>
203-2 Significant indirect economic impacts	<p>TDRC Report for examples of initiatives TD funded under the TD Ready Commitment</p> <p>ESG Report pages 28–30 Sustainable Finance (see jobs supported enclosed)</p> <p>ESG Report pages 48–49 TD Pathways to Economic Inclusion</p> <p>ESG Report pages 51–52 Financial Access and Inclusion</p> <p>ESG Report pages 53–55 Diversity and Inclusion (see information on how we support diverse customers and encourage supply chain diversity)</p> <p>ESG Report pages 83–84 Financial Education and LMI Customer Products</p>
GRI 205: Anti-corruption 2016	
205-2 Communication and training about anti-corruption policies and procedures	<p>TD's Statement on Anti-Corruption Anti-Bribery and Anti-Corruption Program (see annual training requirements enclosed)</p>



Disclosure	References and Responses
GRI 302: Energy 2016	
302-1 Energy consumption within the organization	ESG Report pages 80 Energy Consumption and 79 Notes to GHG Emissions
302-3 Energy intensity	ESG Report page 80 Energy Consumption
302-4 Reduction of energy consumption	ESG Report page 80 Energy Consumption
GRI 305: Emissions 2016	
305-1 Direct (Scope 1) GHG emissions	ESG Report pages 77–79 Greenhouse Gas Emissions and 79 Notes to GHG Emissions
305-2 Energy indirect (Scope 2) GHG emissions	ESG Report pages 77–79 Greenhouse Gas Emissions and 79 Notes to GHG Emissions
305-3 Other indirect (Scope 3) GHG emissions	ESG Report pages 77–79 Greenhouse Gas Emissions and 79 Notes to GHG Emissions
305-4 GHG emissions intensity	ESG Report pages 77–79 Greenhouse Gas Emissions
305-5 Reduction of GHG emissions	CAR pages 45–55 Metrics and Targets ESG Report pages 77–79 Greenhouse Gas Emissions ESG Report pages 16–17 TD Performance Against Goals ESG Report pages 40–42 Climate Change
GRI 401: Employment 2016	
401-1 New employee hires and employee turnover	ESG Report page 89 Investing in Talent ESG Report page 92 Employee Turnover
401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Summary of Benefit Programs All part-time and full-time permanent employees are eligible for the plans enclosed.
GRI 403: Occupational Health and Safety 2018	
403-9 Work-related injuries	ESG Report page 92 Workplace Health and Safety
GRI 404: Training and Education 2016	
404-1 Average hours of training per year per employee	ESG Report page 89 Global Training and Development
404-2 Programs for upgrading employee skills and transition assistance programs	ESG Report pages 56–59 Colleague Development, Retention and Well-being TD's Approach to Total Rewards TD's Approach to Job Transitions



Disclosure	References and Responses
GRI 405: Diversity and Equal Opportunity 2016	
405-1 Diversity of governance bodies and employees	<p>ESG Report pages 86–88 Diversity and Inclusion</p> <p>ESG Report page 59 Total Colleagues, Colleague Age Profile, Colleagues by Region</p> <p>ESG Report page 71 Corporate Governance and Integrity</p> <p>PC page 12 Director Nominees</p>
405-2 Ratio of basic salary and remuneration of women to men	<p>TD's Approach to Total Rewards page 3 Equitable Pay</p>
GRI 413: Local Communities 2016	
413-1 Operations with local community engagement, impact assessments, and development programs	<p>In the U.S., community engagement, impact assessment and development programs are federally legislated by the <i>Community Reinvestment Act</i>.</p> <p>ESG Report pages 48–49 TD Pathways to Economic Inclusion</p> <p>ESG Report page 50 Highlight on Affordable Housing</p> <p>ESG Report pages 51–52 Financial Access and Inclusion</p> <p>ESG Report page 65 How We Listen to Stakeholders</p>
413-2 Operations with significant actual and potential negative impacts on local communities	<p>PAS page 12 Branches Opened, Relocated and Closed in 2022</p>
GRI 417: Marketing and Labeling 2016	
417-1 Requirements for product and service information and labeling	<p>ESG Report pages 63–64 Product and Service Responsibility</p> <p>About TD for a description of products and services by business line</p> <p>Codes of Conduct and Public Commitments</p> <p>To Our Customers</p> <p>Understanding Tied Selling</p> <p>How We Protect You (Security Measures)</p> <p>Our Privacy Commitments</p> <p>PAS pages 17–18 Seniors Code</p>
GRI 418: Customer Privacy 2016	
418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	<p>ESG Report page 72 Data Security and Privacy</p>