

TD Bank Group: Slavery and Human Trafficking Statement¹

Our Commitment to Human Rights

Across our businesses and operations, TD is committed to supporting and respecting the protection of human rights. We understand the important role that we play in respecting the human rights of our employees, customers, and members of the communities in which we operate, and we aim to avoid contributing to adverse human rights impacts through our business activities, including our supply chain.

TD's primary businesses are conducted in countries that are governed by legal and human rights regulations. We comply with applicable local laws, including those related to human rights.

We recognize that slavery and trafficking, in all forms, represent a violation of human rights. As such, TD released a [Statement on Human Rights](#) in 2020 to reaffirm our commitment to support and respect human rights. This commitment is also in accordance with the corporate responsibility to respect human rights as set out in the United Nations Guiding Principles on Business and Human Rights (UNGP) and guided by the values reflected in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Labour Organization's core conventions.

About TD

Headquartered in Toronto, Canada, with more than 90,000 employees in offices around the world, The Toronto-Dominion Bank (which is a federally regulated bank governed by the Bank Act (Canada)) and its subsidiaries (details and locations of which can be found at Note 33 to the Bank's consolidated financial statements for the year ended October 31, 2022) are collectively known as TD Bank Group (TD). TD is the sixth largest bank in North America by total assets and serves more than 27 million customers in four key businesses operating in a number of locations in financial centres around the globe: Canadian Personal and Commercial Banking, U.S. Retail, Wealth Management and Insurance, and Wholesale Banking. TD also ranks among the world's leading online financial services firms, with more than 15 million active online and mobile customers. TD's vision is to be the better bank. Our purpose is to enrich the lives of our customers, communities and colleagues.

TD engages with suppliers in various categories such as Business Operations; HR, Travelling & Marketing; IT & Communications; Professional Services; and Real Estate. Suppliers who provide higher risk products and services are asked to complete detailed questionnaires. As part of this process, we may, where appropriate, apply enhanced due diligence to sourcing products and services identified as higher risk for social, ethical, environmental and geographical elements. TD assesses these responses and engages in dialogue with the supplier to set corrective action if areas of improvement are identified.

Our Policies, Due Diligence Processes and Training Practices

How we achieve our business goals matters as much as our business goals themselves. That's why we have various internal policies, standards and guidelines that cover the conduct of our employees, directors and businesses, and how we select our suppliers.

Our Employees and Business

We abide by and in many cases exceed applicable labour laws and standards addressing issues such as equal pay, hours of work and child labour. Where TD enters into an agreement with a staffing agency for the agency to assign individuals to perform work on TD's behalf, TD requires that the agency represent that all such individuals are eligible and approved to work in the applicable country.

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

Under the [TD Code of Conduct and Ethics](#), every employee and member of the Board of Directors of TD is required to assess whether business decisions and actions on behalf of the organization are right, legal and fair, and within our risk appetite. All employees are required to complete annual Code of Conduct and Ethics training and attest to ongoing compliance.

Eligible employees in the U.S. also attest annually to TD's Anti-Trafficking Policy, adopted in compliance with the U.S. Federal Acquisition Regulation. Among other restrictions, the Anti-Trafficking Policy prohibits trafficking in persons and certain practices with respect to recruitment, including charging employees for recruitment fees and denying them access to their identity documents.

[TD's Conduct and Ethics Hotline](#) provides a confidential and anonymous reporting channel to employees, customers, third-party workers and members of the public to report their concerns regarding TD without fear of retaliation; they can also report allegations of retaliation for having reported matters in good faith. TD's Conduct and Ethics Hotline is hosted by a third-party and is independently managed within TD. TD employees may also contact the Between Us: Employee Ombudsman Office for confidential, informal and impartial guidance on how to report a concern.

TD has adopted policies with respect to anti-money laundering and anti-terrorist financing (AML/ATF; see [TD's Statement on Anti-Money Laundering, Anti-Terrorist Financing and Sanctions](#)), and anti-bribery and anti-corruption (see [TD's Statement on Anti-Corruption](#)). This framework of policies and procedures

¹ This statement is made pursuant to section 54(1) of the United Kingdom *Modern Slavery Act 2015* on behalf of TD Bank Group subject to the Act (The Toronto-Dominion Bank (London Branch) and TD Bank Europe Limited), and excludes TD's investment in The Charles Schwab Corporation (which became effective on October 6, 2020) and TD Ameritrade Holding Corporation (which investment ceased on October 6, 2020). It constitutes TD Bank Group's Slavery and Human Trafficking Statement for the fiscal year ending October 31, 2022.



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is designed to detect and deter the use of TD products and services for money-laundering and terrorist financing activities, comply with AML/ATF laws and regulations, comply with economic sanctions laws, and provide principles of conduct to deter and detect bribery and corruption activities. TD's AML/ATF training program for all employees includes examples that highlight the risk of money laundering transactions relating to human trafficking activities. In addition, TD continues to actively participate in public-private initiatives, such as Project Protect, focused on the detection and prevention of human trafficking.

Environmental and social issues, such as human rights, are also addressed within our business risk frameworks and processes. For example, for non-retail credit lending, TD's Environmental and Social Risk Assessment Tool contains due diligence tools that include human rights considerations. In addition, since 2007, TD subscribes to the Equator Principles, which incorporate requirements for both environmental and social risk considerations in applicable project finance transactions.

Our Suppliers

Our commitment to human rights and combatting modern slavery is also reflected in the suppliers we choose. TD is committed to sourcing 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. Within TD's Supplier Code of Conduct, suppliers are expected to have guidelines, policies and practices that are communicated throughout their organization, upheld by all levels of management, and considered and applied to their own supply chain activities, in relation to the following:

- Protection of human rights;
- Protection of health and safety;
- Fair labour practices;
- Code of conduct and ethics;
- Diversity and inclusion;
- Anti-bribery/anti-corruption;
- Environmental sustainability;
- Legal and regulatory compliance;
- Privacy and confidentiality;
- Accessibility;
- Corporate responsibility; and
- Supplier diversity.

When registering suppliers, we request that they confirm that they operate in accordance with the expectations described in our Supplier Code of Conduct, including protection of human rights.

Within TD's Supplier Code of Conduct, there are six criteria that are related to the issue of modern slavery and human trafficking:

Protection of Human Rights	Respect for basic human rights, including rights to life and liberty, freedom of thought and expression, and equality; no tolerance for and protections against workplace harassment or abuse, violence, and discrimination (including for reasons protected by applicable human rights laws, such as a person's race, colour, sex, sexual orientation, gender identity, national origin, religion, veteran status, marital status or disability).
Protection of Health and Safety	A culture of safety and supporting practices, minimizing risk of injury, illness, or death, and documented safety procedures (including accident reporting and emergency evacuation).
Fair Labour Practices	No tolerance for use of any form of child or forced labour, slavery, or human trafficking, in any operations or facilities; compliance with applicable labour laws, including those relating to wage rates and conditions of employment.
Code of Conduct and Ethics	Guidelines for workplace performance that define organizational expectations in respect of ethical, moral, and legal behaviours.
Legal and Regulatory Compliance	Compliance with applicable laws and regulatory requirements applicable to suppliers, to TD and to goods and services being provided.
Corporate Responsibility	Policies, practices and relevant reporting that demonstrate a commitment to corporate responsibility for environmental, social and ethical matters.



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As part of our responsible sourcing program, the Bank may, where appropriate, apply enhanced due diligence on parts of our supply chain related to certain environmental or social issues. For example, in 2019, as part of our commitment against modern slavery and human trafficking, we engaged over 170 hotels to determine whether they had sufficient staff training and procedures to properly report suspected human trafficking incidences on premises. Since 2020, as a result of our assessment, suppliers in our hotel program have committed to providing adequate training and implementing enhancements where applicable in accordance with international best practices. We are continuing to work with our hotel suppliers on this initiative.

In 2021, we performed an in-depth review of TD's branded merchandise suppliers and consulted with them on topics related to due diligence and social auditing, which included a review of health and safety and social (human and labour rights) and environmental aspects of the manufacturing process. Our Responsible Sourcing Due Diligence Guidelines for TD-branded merchandise vendors came into effect in June 2021 and outlines the requirement to have third-party audits for social issues, such as forced labour, for any promotional products being supplied to TD. These third-party audits are designed to help provide visibility to TD regarding such vendor's adherence to the principles of TD's Supplier Code of Conduct.

Summary

As a responsible business enterprise and corporate citizen, we are committed to conducting our affairs with the highest standards of ethics, integrity, honesty, fairness, and professionalism. We believe TD has the appropriate policies and practices to address the risk of slavery and human trafficking in our business activities and supply chain.

This statement was approved by the Board of Directors on March 2, 2023, and is reviewed and updated annually.



Bharat Masrani, Group President and CEO,
March 2023

