



2023 Global Reporting Initiative (GRI) Index

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

Legend:

- AR: [TD's 2023 Annual Report](#)
- PC: [TD's 2024 Proxy Circular](#)
- Sustainability Report: [TD's 2023 Sustainability Report](#)
- CAR: [TD's Climate Action Plan: 2023 Progress Update](#)
- PAS: [TD's 2023 Public Accountability Statement](#)
- TDRC Report: [2023 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, 2022 to October 31, 2023.
GRI 2: General Disclosures 2021	
The Organization and its Reporting Practices	
2-1 Organizational details	<p>Toronto-Dominion Bank and its subsidiaries are collectively known as TD Bank Group (“TD”, “the Bank”).</p> <p>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.</p> <p>Headquarters: Toronto, Canada</p> <p>Countries of operations: AR (page 5); AR: Information on Subsidiaries (page 220)</p>
2-2 Entities included in the organization’s sustainability reporting	<p>Sustainability Report: Focused on the sustainability-themed activities and operations of TD and its wholly owned subsidiaries and supporting TD’s sustainability strategy (page 3). Further information regarding the activities and operations of TD and its wholly owned subsidiaries more generally is included in TD’s 2023 Annual Report.</p> <p>AR: Management’s Responsibility for Financial Information and Assurance of Financial Statements (pages 133-138). TD’s consolidated financial statements encompasses The Toronto-Dominion Bank and its subsidiaries.</p> <p>AR: Information on Subsidiaries (page 220)</p>
2-3 Reporting period, frequency and contact point	<p>TD publishes its Sustainability Report and financial statements on an annual cycle based on its fiscal year.</p> <p>TD’s 2023 Sustainability Report is for the reporting period November 1, 2022, to October 31, 2023, and was published March 14, 2024.</p> <p>Email address for questions about TD’s sustainability reporting and performance: tdreadycommitment@td.com</p>



Disclosure	References and Responses
2-4 Restatements of information	Restatements of information and reasoning are provided in the text and footnotes of the Sustainability Report .
2-5 External assurance	<p>Ernst & Young LLP performed various assurance engagements for a selection of TD’s sustainability disclosures. Ernst & 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>The LBG (formerly the London Benchmarking Group) Model is a recognized global standard for managing, measuring and reporting community investment. In addition to TD’s own calculations, we ask LBG Canada to calculate our corporate giving and assess our data based on their methodology, which helps to account for the broader impacts of our financial contribution to communities.</p> <p>2023 Assurance Report for Sustainability Metrics</p> <p>2023 Assurance Report for TD Green Bond (2021) Issuance – Use of Proceeds</p> <p>LBG Verification Statement</p>
Activities and Workers	
2-6 Activities, value chain and other business relationships	<p>AR: Corporate Overview (page 21); Business Focus (page 33)</p> <p>AR: Business Segment analyses (pages 33-51)</p> <p>Sustainability Report: Sustainability Highlights Across Our Business – Corporate (page 8)</p> <p>Sustainability Report: Employment Access (pages 49-56)</p> <p>AR: Significant and Subsequent Events (page 20)</p>
2-7 Employees	Sustainability Report : Employment Access (pages 89-95)
2-8 Workers who are not employees	Sustainability Report : Employee by Contract Type (page 93)
Governance	
2-9 Governance structure and composition	<p>PC: Schedule A, Corporate Governance (pages 93-116)</p> <p>PC: Director Nominees (pages 13-24)</p> <p>PC: Strengthening Diversity, Equity and Inclusion (pages 31-32)</p> <p>PC: Approach to Executive Compensation (pages 39-49)</p> <p>Sustainability Report: Corporate Governance and Integrity (pages 17-20)</p> <p>Sustainability Report: Employment Access (pages 49-56)</p> <p>Corporate Governance Structure</p> <p>Corporate Governance: Committees of the Board</p>
2-10 Nomination and selection of the highest governance body	PC : Schedule A, Corporate Governance (pages 93-116)
2-11 Chair of the highest governance body	PC : TD’s Chair of the Board is independent (page 94)



Disclosure	References and Responses
2-12 Role of the highest governance body in overseeing the management of impacts	<p>Sustainability Report: Corporate Governance and Integrity (pages 17-20)</p> <p>Sustainability Report: Engaging Our Stakeholders and Prioritizing TD's ESG Topics (page 15)</p> <p>Sustainability Report: How We Listen to Stakeholders (pages 64-65)</p> <p>Corporate Governance Committee Charter</p> <p>AR: Environmental and Social Risk (pages 114-116)</p> <p>PC: Board Engagement on ESG Matters (pages 30-31)</p> <p>PC: Schedule A, Corporate Governance (pages 93-116)</p>
2-13 Delegation of responsibility for managing impacts	<p>AR: Risk Factors That May Affect Future Results – Environmental and Social Risk (pages 76-82)</p> <p>AR: Environmental and Social Risk – Who Manages Environmental and Social Risk, How TD Manages Environmental and Social Risk (pages 114-116)</p> <p>CAR: Board of Directors Oversight (pages 14-15); Management Oversight (pages 16-17)</p> <p>PC: Schedule A, Corporate Governance (pages 93-116)</p> <p>Risk Committee Charter</p>
2-14 Role of the highest governance body in sustainability reporting	<p>TD's CEO approves the Sustainability Report</p> <p>Corporate Governance Committee Charter</p> <p>Sustainability Reporting Details: Details of TD's Materiality Assessment Process (page 1)</p>
2-15 Conflicts of interest	<p>PC: Schedule A, Corporate Governance – Director Conflict of Interest (page 101)</p> <p>PC: Director Profiles (pages 15-24)</p> <p>Corporate Governance Committee Charter</p>
2-16 Communication of critical concerns	<p>Shareholders, employees and other interested parties may communicate with the Board of Directors through the Board Chair.</p> <p>PC: Shareholder Inquiries (page 117)</p> <p>AR: Shareholder and Investor Information (page 225)</p> <p>Corporate Governance Committee Charter</p>
2-17 Collective knowledge of the highest governance body	<p>Sustainability Report: Engaging on Environmental and Social (E&S) Matters (pages 19-20)</p> <p>Sustainability Report: Performance Highlights – Governance (page 2)</p> <p>PC: Board Engagement on ESG Matters (pages 30-31)</p> <p>CAR: Board of Directors Oversight (pages 14-15)</p>
2-18 Evaluation of the performance of the highest governance body	<p>PC: Director Compensation (pages 25-27)</p> <p>PC: Compensation Discussion and Analysis and Approach to Executive Compensation (pages 38-49)</p> <p>PC: 2023 Performance and Compensation (see also business performance calculations) (pages 50-63)</p>




Disclosure	References and Responses
2-19 Remuneration policies	<p>PC: Compensation Discussion and Analysis and Approach to Executive Compensation (pages 38-49)</p> <p>PC: 2023 Performance and Compensation (pages 50-63)</p> <p>PC: Alignment to Financial Stability Board Principles and Risk Management Practices (pages 64-67)</p> <p>Sustainability Report: Linking ESG Factors in Executive Total Rewards (page 18)</p>
2-20 Process to determine remuneration	<p>PC: Compensation Discussion and Analysis and Approach to Executive Compensation (pages 38-49)</p> <p>PC: 2023 Performance and Compensation (pages 50-63)</p> <p>PC: Alignment to Financial Stability Board Principles and Risk Management Practices (pages 64-67)</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>
2-21 Annual total compensation ratio	<p>Reason for omission: Confidentiality constraints.</p> <p>This information is considered confidential.</p>
Strategies, Policies and Practices	
2-22 Statement on sustainable development strategy	<p>Sustainability Report: A Message From Our Leadership (pages 4-5)</p> <p>CAR: Messages From Our Leadership (page 10)</p>
2-23 Policy commitments	<p>Code of Conduct and Ethics</p> <p>TD Bank Group Statement on Human Rights</p> <p>2023 TD Modern Slavery and Human Trafficking Report</p> <p>Supplier Code of Conduct</p> <p>TD Bank Group Statement on Anti-Money Laundering, Anti-Terrorist Financing and Sanctions</p> <p>TD Bank Group Statement on Anti-Corruption</p> <p>Codes of Conduct and Public Commitments</p> <p>Sustainability Report: Corporate Governance and Integrity (pages 17-20)</p> <p>Sustainability Report: Environmental and Social Risk Management (page 21)</p> <p>Who We Are</p>



Disclosure	References and Responses
2-24 Embedding policy commitments	CAR : Our Approach to Climate Governance, Board of Directors Oversight, and Management Oversight (pages 13-17) Sustainability Report : Corporate Governance and Integrity – Our Approach, Our Commitment to Human Rights, Our Approach in Action (pages 17-20) Sustainability Report : Sustainability Highlights Across Our Business – Corporate for information on supplier attestation (page 8) Sustainability Report : Responsible Conduct – Percentage of eligible employees who completed the Code of Conduct and Ethics and anti-money laundering training (page 75)
2-25 Processes to remediate negative impacts	Sustainability Report : Promoting Responsible Conduct – Between Us: Employee Ombudsman Office (page 17) Sustainability Report : Employee Relations – Employee Complaint Resolution Process (page 55) TD Conduct and Ethics Hotline , managed by an independent third party Code of Conduct and Ethics Senior Customer Complaints Office
2-26 Mechanisms for seeking advice and raising concerns	Sustainability Report : Promoting Responsible Conduct– Between Us: Employee Ombudsman Office (page 17) Sustainability Report : Employee Relations – Employee Complaint Resolution Process (page 55) TD Conduct and Ethics Hotline , managed by an independent third party
2-27 Compliance with laws and regulations	TD does not disclose total instances of non-compliance with laws and regulations. However, TD provides information regarding material legal matters in its Annual Report and applicable securities filings. AR : Note 26: Provisions, Contingent Liabilities, Commitments, Guarantees, Pledged Assets, and Collateral (pages 212-213)
2-28 Membership associations	CAR : Engagement with Industry-led Groups and Public Sector Organizations (pages 41-45) Sustainability Reporting Details : Environmental, Social and Governance Stakeholder Engagement (pages 2-4)
Stakeholder Engagement	
2-29 Approach to stakeholder engagement	Sustainability Report : Engaging Our Stakeholders and Prioritizing TD’s ESG Topics (page 15) Sustainability Report : How We Listen to Stakeholders (pages 64-65) Sustainability Reporting Details : Environmental, Social and Governance Stakeholder Engagement (pages 2-4)
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	Sustainability Reporting Details : Details of TD’s Materiality Assessment Process (page 1) Sustainability Report : Engaging Our Stakeholders and Prioritizing TD’s ESG Topics (page 15)



Disclosure	References and Responses
3-2 List of material topics	<p>Sustainability Report: Engaging Our Stakeholders and Prioritizing TD’s ESG Topics (page 15). 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 sustainability 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: Sustainability Report: Climate Change (pages 42-43); CARColleague Health and Well-being: Sustainability Report: Employment Access (pages 49-56)Community Well-being: Sustainability Report: TD Pathways to Economic Inclusion (pages 47-48); TDRC ReportConsumer Protection: Sustainability Report: Product and Service Responsibility (page 28) and Customer Experience (pages 26-27)Corporate Governance: Sustainability Report: Corporate Governance and Integrity (pages 17-20)Customer Experience: Sustainability Report: Customer Experience (pages 26-27)Data Privacy: Sustainability Report: Data Security and Privacy (pages 24-25)Data Security: Sustainability Report: Data Security and Privacy (pages 24-25)Diversity, Equity and Inclusion: Sustainability Report: Employment Access – Building a Diverse and Inclusive Organization (page 53); Helping Address Barriers to Employment Through Workforce Attraction, Training and Skills Development (page 55); and Encouraging Diversity in Our Supply Chain (page 56)Environmental and Social Governance and Risk Management: Sustainability Report: Environmental and Social Risk Management (page 21) and Corporate Governance and Integrity (pages 17-20)Ethics and Integrity: Sustainability Report: Corporate Governance and Integrity (pages 17-20)Financial Access and Inclusion: Sustainability Report: Financial Access (pages 57-61)Human Rights: Sustainability Report: Corporate Governance and Integrity (pages 17-20); see also locations throughout the report with this icon Sustainable Finance: Sustainability Report: Sustainable Finance (pages 29-40)Talent Attraction, Development, and Retention: Sustainability Report: Employment Access (pages 49-56)



Disclosure	References and Responses
GRI Topic Standards	
GRI 201 Economic Performance 2016	
201-2 Financial implications and other risks and opportunities due to climate change	Sustainability Report : Climate Change (pages 42-43) CDP Climate Change Questionnaire 2023 Environmental and Social Risk Process AR : Environmental and Social Risk (pages 80 and 114-116) CAR
GRI 203: Indirect Economic Impacts 2016	
203-1 Infrastructure investments and services supported	TDRC Report : Examples of TD-funded initiatives under the TD Ready Commitment Sustainability Report : TD Pathways to Economic Inclusion (pages 47-48) Sustainability Report : Sustainability Highlights Across Our Business – Commercial and Business Banking (page 7) Sustainability Report : Housing Access (pages 62-63) Sustainability Report : Sustainable Finance (pages 30-34) Sustainability Report : Nature and Biodiversity – What We Did in 2023 (page 45) TD Bank Group's Low-Carbon Economy Progress Report TD Green Bond (2021) Issuance – Use of Proceeds
203-2 Significant indirect economic impacts	TDRC Report : Examples of TD-funded initiatives under the TD Ready Commitment Sustainability Report : TD Pathways to Economic Inclusion (pages 47-48) Sustainability Report : Financial Access (pages 57-61) Sustainability Report : Employment Access – Encouraging Diversity in Our Supply Chain (page 56) Sustainability Report : Financial Education (page 96)
GRI 205: Anti-corruption 2016	
205-2 Communication and training about anti-corruption policies and procedures	TD Bank Group Statement on Anti-Corruption : Anti-Bribery and Anti-Corruption Program (see training requirements)
GRI 302: Energy 2016	
302-1 Energy consumption within the organization	Sustainability Report : Energy Consumption (page 87); Note to GHG Emissions (page 86)
302-3 Energy intensity	Sustainability Report : Energy Consumption (page 87)
302-4 Reduction of energy consumption	Sustainability Report : Energy Consumption (page 87)



Disclosure	References and Responses
GRI 305: Emissions 2016	
305-1 Direct (Scope 1) GHG emissions	Sustainability Report : Greenhouse Gas Emissions (pages 83-85); Note to GHG Emissions (page 86)
305-2 Energy indirect (Scope 2) GHG emissions	Sustainability Report : Greenhouse Gas Emissions (pages 83-85); Note to GHG Emissions (page 86)
305-3 Other indirect (Scope 3) GHG emissions	Sustainability Report : Greenhouse Gas Emissions (pages 83-85); Note to GHG Emissions (page 86)
305-4 GHG emissions intensity	Sustainability Report : Greenhouse Gas Emissions (pages 83-85)
305-5 Reduction of GHG emissions	CAR : Metrics and Targets (pages 61-90) Sustainability Report : Greenhouse Gas Emissions (pages 83-85) Sustainability Report : TD Performance Against Goals (pages 11-12) Sustainability Report : Climate Change (pages 42-43)
GRI 401: Employment 2016	
401-1 New employee hires and employee turnover	Sustainability Report : Investing in Talent (page 93) Sustainability Report : Employee Turnover (page 95)
401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Summary of Benefit Programs
GRI 403: Occupational Health and Safety 2018	
403-9 Work-related injuries	Sustainability Report : Workplace Health and Safety (page 95) Summary of North American Health and Safety Policy
GRI 404: Training and Education 2016	
404-1 Average hours of training per year per employee	Sustainability Report : Global Training and Development (page 93)
404-2 Programs for upgrading employee skills and transition assistance programs	Sustainability Report : Employment Access, Our Approach In Action – Our Colleague Promise, Impact and Growth (pages 50-53) TD's Approach to Equitable Pay TD's Approach to Job Transitions
GRI 405: Diversity and Equal Opportunity 2016	
405-1 Diversity of governance bodies and employees	Sustainability Report : Employment Access — Total Executive Appointments, Board Diversity, Workforce Diversity (pages 89-91) Sustainability Report : TD's Board of Directors (page 75) PC : Director Nominees (pages 13-24) PC : Strengthening Diversity, Equity and Inclusion (pages 31-32)
405-2 Ratio of basic salary and remuneration of women to men	TD's Approach to Equitable Pay



Disclosure	References and Responses
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>Sustainability Report: Social – Employment Access, Financial Access, and Housing Access (pages 46-63)</p> <p>Sustainability Report: How We Listen to Stakeholders (pages 64-65)</p> <p>Sustainability Report: Engaging Our Stakeholders and Prioritizing TD's ESG Topics (page 15)</p> <p>TDRC Report: Examples of TD-funded initiatives under the TD Ready Commitment</p> <p>The LBG (formerly the London Benchmarking Group) Model is a recognized global standard for managing, measuring and reporting community investment. In addition to TD’s own calculations, we ask LBG Canada to calculate our corporate giving and assess our data based on their methodology, which helps to account for the broader impacts of our financial contribution to communities.</p> <p>LBG Verification Statement</p>
413-2 Operations with significant actual and potential negative impacts on local communities	<p>PAS: Branches Opened, Relocated and Closed in Canada in 2023 (page 11)</p>
GRI 417: Marketing and Labeling 2016	
417-1 Requirements for product and service information and labeling	<p>Sustainability Report: Product and Service Responsibility (page 28)</p> <p>About TD: 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>TD Privacy Policy</p> <p>PAS: Seniors Code (pages 16-17)</p>
GRI 418: Customer Privacy 2016	
418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	<p>Sustainability Report: Data Security and Privacy (page 78)</p>