



# 2023 SASB Index

**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](#)
- TDRS Report: [2023 TD Ready Commitment Report](#)

TD has used the [Sustainability Accounting Standards Board](#) (SASB) for sustainability reporting since 2019. The following index includes the SASB sector standards that we have deemed most relevant to our business activities.

SASB Disclosure	Accounting Metric	2023 Disclosure
<b>Activity Metrics – Asset Management &amp; Custody Activities</b>		
FN-AC-000.A	(1) Total assets under management (AUM)	<a href="#">AR</a> : Table 20 for Canada AUM (page 47) <a href="#">AR</a> : Table 18 for US AUM (page 42) TD does not disclose registered vs. unregistered.
FN-AC-000.B	Total assets under custody and supervision	<a href="#">2023 G-SIB Disclosure Template</a>
<b>Activity Metrics – Commercial Banks</b>		
FN-CB-000.A	(1) Number and (2) value of chequing and savings accounts by segment: (a) personal and (b) small business	<a href="#">2023-Q4 Supplemental Financial Information</a> : Average deposits in Canada and U.S. Retail, breakdown by personal, business and other (pages 9-11) TD does not disclose the number of accounts, or the breakdown of chequing and savings accounts or the amounts specifically related to small business.
FN-CB-000.B	(1) Number and (2) value of loans by segment: (a) personal, (b) small business, and (c) corporate	<a href="#">2023-Q4 Supplemental Financial Information</a> : Average loans in Canadian and U.S. Retail, breakdown by personal and business (pages 9-11) TD does not disclose the number of loans or the breakdown between small business and corporate.
<b>Activity Metrics – Consumer Finance</b>		
FN-CF-000.B	Number of (1) credit card accounts and (2) pre-paid debit card accounts	<a href="#">AR</a> : Table 25: Loans and Acceptances, Net of Stage 3 Allowance for Loan Losses by Industry Sector (Total credit card loans in Canada and U.S.) (pages 55-56) TD does not disclose the number of accounts.



SASB Disclosure	Accounting Metric	2023 Disclosure
<b>Activity Metrics – Mortgage Finance</b>		
FN-MF-000.A	(1) Number and (2) value of mortgages originated by category: (a) residential and (b) commercial	<p><a href="#">AR</a>: Table 25: Loans and Acceptances, Net of Stage 3 Allowance for Loan Losses by Industry Sector (Total residential mortgages in Canada and U.S.) (pages 55-56)</p> <p>TD does not disclose the number of mortgages originated.</p>
FN-MF-000.B	(1) Number and (2) value of mortgages purchased by category: (a) residential and (b) commercial	<p><a href="#">AR</a>: Table 25: Loans and Acceptances, Net of Stage 3 Allowance for Loan Losses by Industry Sector (Total residential mortgages in Canada and U.S.) (pages 55-56)</p> <p>TD does not disclose the number of mortgages originated.</p>
<b>Business Ethics</b>		
FN-AC-510a.1 FN-CB-510a.1 FN-IB-510a.1	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behaviour, market manipulation, malpractice, or other related financial industry laws or regulations	<p><a href="#">AR</a>: Note 26: Provisions, Contingent Liabilities, Commitments, Guarantees, Pledged Assets, and Collateral (page 212), which provides information regarding the Bank’s provisions, as well as reasonably possible losses in its legal and regulatory actions (that is, those which are neither probable nor remote), in excess of provisions, but does not disclose whether such losses are as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations.</p> <p>The Bank provides disclosure regarding the material legal proceedings to which it and its direct and indirect subsidiaries are a party in its annual report to shareholders.</p> <p>TD does not disclose the amount.</p>
FN-AC-510a.2 FN-CB-510a.2 FN-IB-510a.2	Description of whistleblower policies and procedures	<p><a href="#">Sustainability Report</a>: Corporate Governance and Integrity – Promoting Responsible Conduct (page 17)</p> <p><a href="#">TD Conduct and Ethics Hotline</a></p> <p><a href="#">Code of Conduct and Ethics</a></p> <p><a href="#">Raising Conduct and Ethics Concerns (Whistleblower) Procedures (Canada)</a></p> <p><a href="#">Procedures for Raising Conduct and Ethics Concerns (TDGUS)</a></p> <p><a href="#">Raising Conduct and Ethics Concerns Policy</a></p> <p><a href="#">2023 TD Modern Slavery and Human Trafficking Report</a></p>
<b>Systemic Risk Management</b>		
FN-CB-550a.1 FN-IB-550a.1	Global Systemically Important Bank (G-SIB) score, by category	<p><a href="#">2023 G-SIB Disclosure Template</a></p> <p><a href="#">2023-Q1 Quarterly Results Report to Shareholders</a>: Table 25: G-SIB Indicators (page 26)</p>
FN-CB-550a.2 FN-IB-550a.2	Description of approach to incorporation of results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy, and other business activities	<a href="#">AR</a> : Risk Factors and Management — Managing Risk (Stress Testing) (pages 87 and 95)



SASB Disclosure	Accounting Metric	2023 Disclosure
<b>Professional Integrity</b>		
FN-IB-510b.1	(1) Number and (2) percentage of covered employees with a record of investment-related investigations, consumer-initiated complaints, private civil litigations, or other regulatory proceedings	In the ordinary course of business, the Bank and its subsidiaries are involved in various legal and regulatory actions including but not limited to civil claims and lawsuits, regulatory examinations, investigations, audits and requests for information by various governmental regulatory agencies and law enforcement authorities in various jurisdictions. In addition, from time to time, in the ordinary course of business, the Bank and its subsidiaries are assessed for fees or fines by securities regulatory authorities in relation to administrative matters, including late filings or reporting, which may be considered penalties or sanctions pursuant to Canadian securities regulations, but which are not, individually or in the aggregate, material to the Bank. In addition, the Bank and its subsidiaries are subject to numerous regulatory authorities around the world, and fees, administrative penalties, settlement agreements and sanctions may be categorized differently by each regulator. The Bank provides disclosure regarding the material legal proceedings to which it and its direct and indirect subsidiaries are a party in its annual report to shareholders.
FN-IB-510b.2	Number of mediation and arbitration cases associated with professional integrity, including duty of care, by party	In the ordinary course of business, the Bank and its subsidiaries are involved in various legal and regulatory actions including but not limited to civil claims and lawsuits, regulatory examinations, investigations, audits and requests for information by various governmental regulatory agencies and law enforcement authorities in various jurisdictions. In addition, from time to time, in the ordinary course of business, the Bank and its subsidiaries are assessed fees or fines by securities regulatory authorities in relation to administrative matters, including late filings or reporting, which may be considered penalties or sanctions pursuant to Canadian securities regulations, but which are not, individually or in the aggregate, material to the Bank. In addition, the Bank and its subsidiaries are subject to numerous regulatory authorities around the world, and fees, administrative penalties, settlement agreements and sanctions may be categorized differently by each regulator. The Bank provides disclosure regarding the material legal proceedings to which it and its direct and indirect subsidiaries are a party in its annual report to shareholders.
FN-IB-510b.3	Total amount of monetary losses as a result of legal proceedings associated with professional integrity, including duty of care	<p><b>AR:</b> Note 26: Provisions, Contingent Liabilities, Commitments, Guarantees, Pledged Assets, and Collateral (page 212), which provides information regarding the Bank’s provisions, as well as reasonably possible losses in its legal and regulatory actions (that is, those which are neither probable nor remote), in excess of provisions, but does not disclose whether such losses are as a result of legal proceedings associated with professional integrity, including duty of care.</p> <p>The Bank provides disclosure regarding the material legal proceedings to which it and its direct and indirect subsidiaries are a party in its annual report to shareholders.</p> <p>TD does not disclose the amount.</p>
FN-IB-510b.4	Description of approach to ensuring professional integrity, including duty of care	<a href="#">Code of Conduct and Ethics</a>



SASB Disclosure	Accounting Metric	2023 Disclosure
<b>Data Security</b>		
FN-CB-230a.1 FN-CF-230a.1	1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of account holders affected	<p><a href="#">Sustainability Report</a>: Data Security and Privacy (pages 24-25)</p> <p><a href="#">Sustainability Report</a>: Data Security and Privacy (page 78)</p> <p><a href="#">AR</a>: Top and Emerging Risks — Technology and Cyber Security Risk (pages 77-78); Operational Risk — Technology and Cyber Security (page 98)</p> <p>TD does not disclose the number of data breaches, percentage of PII and number of account holders affected.</p>
FN-CB-230a.2 FN-CF-230a.3	Description of approach to identifying and addressing data security risks	<p><a href="#">Sustainability Report</a>: Data Security and Privacy (pages 24-25)</p> <p><a href="#">Sustainability Report</a>: Data Security and Privacy (page 78)</p> <p><a href="#">AR</a>: Top and Emerging Risks — Technology and Cyber Security Risk (pages 77-78); Operational Risk — Technology and Cyber Security (page 98)</p>
<b>Customer Privacy</b>		
FN-CF-220a.1	Number of account holders whose information is used for secondary purposes	<p><a href="#">TD Privacy Policy</a> (policies and procedures about the collection, use and disclosure of customer information)</p> <p>TD does not disclose the number of account holders whose information is used for secondary purposes.</p>
FN-CF-220a.2	Total amount at monetary losses as a result of legal proceedings associated with customer privacy	<p><a href="#">AR</a>: Note 26: Provisions, Contingent Liabilities, Commitments, Guarantees, Pledged Assets, and Collateral (page 212), which provides information regarding the Bank’s provisions, as well as reasonably possible losses in its legal and regulatory actions (that is, those which are neither probable nor remote), in excess of provisions, but does not disclose whether such losses are as a result of legal proceedings associated with customer privacy.</p> <p>The Bank provides disclosure regarding the material legal proceedings to which it and its direct and indirect subsidiaries are a party in its annual report to shareholders.</p> <p>TD does not disclose the amount.</p>



SASB Disclosure	Accounting Metric	2023 Disclosure
<b>Transparent Information &amp; Fair Advice for Customers</b>		
FN-AC-270a.1	(1) Number and (2) percentage of covered employees with a record of investment-related investigations consumer-initiated complaints, private civil litigations, or other regulatory proceedings	In the ordinary course of business, the Bank and its subsidiaries are involved in various legal and regulatory actions including but not limited to civil claims and lawsuits, regulatory examinations, investigations, audits and requests for information by various governmental regulatory agencies and law enforcement authorities in various jurisdictions. In addition, from time to time, in the ordinary course of business, the Bank and its subsidiaries are assessed fees or fines by securities regulatory authorities in relation to administrative matters, including late filings or reporting, which may be considered penalties or sanctions pursuant to Canadian securities regulations, but which are not, individually or in the aggregate, material to the Bank. In addition, the Bank and its subsidiaries are subject to numerous regulatory authorities around the world, and fees, administrative penalties, settlement agreements and sanctions may be categorized differently by each regulator. The Bank provides disclosure regarding the material legal proceedings to which it and its direct and indirect subsidiaries are a party in its annual report to shareholders.
FN-AC-270a.2 FN-IN-270a.1	Total amount at monetary losses as a result of legal proceedings associated with marketing and communication of financial/insurance product-related information to new and returning customers	<p><a href="#">AR</a>: Note 26: Provisions, Contingent Liabilities, Commitments, Guarantees, Pledged Assets, and Collateral (page 212), which provides information regarding the Bank’s provisions, as well as reasonably possible losses in its legal and regulatory actions (that is, those which are neither probable nor remote), in excess of provisions, but does not disclose whether such losses are as a result of legal proceedings associated with marketing and communication of financial/insurance product-related information to new and returning customers.</p> <p>The Bank provides disclosure regarding the material legal proceedings to which it and its direct and indirect subsidiaries are a party in its annual report to shareholders.</p> <p>TD does not disclose the amount.</p>
FN-AC-270a.3 FN-IN-270a.4	Description of approach to informing customers about products and services	<p><a href="#">Sustainability Report</a>: Product and Service Responsibility — Educating Our Customers with Clear Language and Communication (page 28)</p> <p><a href="#">Codes of Conduct and Public Commitments</a></p>
<b>Selling Practices</b>		
FN-CF-270a.5	Total amount of monetary losses as a result of legal proceedings associated with selling and servicing of products	<p><a href="#">AR</a>: Note 26: Provisions, Contingent Liabilities, Commitments, Guarantees, Pledged Assets, and Collateral (page 212), which provides information regarding the Bank’s provisions, as well as reasonably possible losses in its legal and regulatory actions (that is, those which are neither probable nor remote), in excess of provisions, but does not disclose whether such losses are as a result of legal proceedings associated with selling and servicing of products.</p> <p>The Bank provides disclosure regarding the material legal proceedings to which it and its direct and indirect subsidiaries are a party in its annual report to shareholders.</p> <p>TD does not disclose the amount.</p>



SASB Disclosure	Accounting Metric	2023 Disclosure
<b>Lending Practices</b>		
FN-MF-270a.3	Total amount of monetary losses as a result of legal proceedings associated with communications to customers or remuneration of loan originators	<p><a href="#">AR</a>: Note 26: Provisions, Contingent Liabilities, Commitments, Guarantees, Pledged Assets, and Collateral (page 212), which provides information regarding the Bank’s provisions, as well as reasonably possible losses in its legal and regulatory actions (that is, those which are neither probable nor remote), in excess of provisions, but does not disclose whether such losses are as a result of legal proceedings associated with communications to customers or remuneration of loan originators.</p> <p>The Bank provides disclosure regarding the material legal proceedings to which it and its direct and indirect subsidiaries are a party in its annual report to shareholders.</p> <p>TD does not disclose the amount.</p>
<b>Discriminatory Lending</b>		
FN-MF-270b.1	(1) Number, (2) value, and (3) weighted average Loan-to-Value (LTV) ratio of mortgages issued to (a) minority and (b) all other borrowers, by FICO scores above and below 660	<p><a href="#">AR</a>: Table 30: Uninsured Average Loan-To-Value – Newly Originated and Newly Acquired (page 59)</p> <p><a href="#">2023-Q4 Quarterly Results Presentation</a>: U.S. Real Estate Secured Lending Portfolio — Indexed Loan-To-Value (LTV) Distribution and Refreshed FICO Scores (page 64)</p> <p>TD does not disclose the breakdown by minorities or FICO score, and the number of mortgages.</p>
FN-MF-270b.2	Total amount of monetary losses as a result of legal proceedings associated with discriminatory mortgage lending	<p><a href="#">AR</a>: Note 26: Provisions, Contingent Liabilities, Commitments, Guarantees, Pledged Assets, and Collateral (page 212), which provides information regarding the Bank’s provisions, as well as reasonably possible losses in its legal and regulatory actions (that is, those which are neither probable nor remote), in excess of provisions, but does not disclose whether such losses are as a result of legal proceedings associated with discriminatory mortgage lending.</p> <p>The Bank provides disclosure regarding the material legal proceedings to which it and its direct and indirect subsidiaries are a party in its annual report to shareholders.</p> <p>TD does not disclose the amount.</p>
FN-MF-270b.3	Description of policies and procedures for ensuring non-discriminatory mortgage origination	<p><a href="#">Sustainability Report</a>: Product and Service Responsibility — Protecting Our Customers (page 28)</p> <p><a href="#">Code of Conduct and Ethics</a></p> <p><a href="#">TD Bank Group Statement on Human Rights</a></p>



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<b>Financial Inclusion &amp; Capacity Building</b>		
FN-CB-240a.1	(1) Number and (2) amount of loans outstanding qualified to programs designed to promote small business and community development	<a href="#">Sustainability Report</a> : Support for Small Businesses — Small Business Loans (page 98) <a href="#">Sustainability Report</a> : Detailed Breakdown by Program — Community Development Loans (page 97)
FN-CB-240a.3	Number of no-cost retail chequing accounts provided to previously unbanked or underbanked customers	<a href="#">PAS</a> : Access to Banking (page 6) TD does not disclose the number of no-cost retail chequing accounts.
FN-CB-240a.4	Number of participants in financial literacy initiatives for unbanked, underbanked, or underserved customers	<a href="#">Sustainability Report</a> : Financial Education — Number of participants in financial education programs (page 96) <a href="#">Sustainability Report</a> : Financial Education — Number of financial education classes in LMI communities in the U.S. and number of attendees (page 96) TD does not disclose the number of participants in financial literacy initiatives for unbanked, underbanked, or underserved customers.
<b>Incorporation of ESG Factors in Investment Management &amp; Advisory</b>		
FN-AC-410a.1	Amount of assets under management, by asset class, that employ (1) integration of ESG issues, (2) sustainability themed investing, and (3) screening	<a href="#">Sustainability Report</a> : Asset Management (pages 37-38) <a href="#">Sustainability Report</a> : Sustainable Finance (pages 30-34) TD does not disclose amount of assets under management by asset class.
FN-AC-410a.2	Description of approach to incorporation of ESG factors in investment and/or wealth management processes and strategies	<a href="#">Sustainability Report</a> : Asset Management – Our Approach (page 37) <a href="#">Sustainability Report</a> : Sustainable Finance (pages 30-34) <a href="#">2022 TDAM Sustainable Investing Approach</a>
FN-AC-410a.3	Description of proxy voting and investee engagement policies and procedures	<a href="#">TDAM Proxy Voting Guidelines / TDAM Disclosures on Proxy Practices</a> <a href="#">2022 TDAM Sustainable Investing Approach</a> <a href="#">TDAM Sustainable Investing Website</a> <a href="#">2022 TDAM Sustainable Investment Report</a>
<b>Incorporation of ESG Factors in Credit Analysis</b>		
FN-CB-410a.2	Description of approach to incorporation of ESG factors in credit analysis	<a href="#">CAR</a> : Our Climate Risks – Heatmap (pages 52-55) <a href="#">CAR</a> : Carbon-Related Assets (page 52) <a href="#">Sustainability Report</a> : E&S Risk Management in Lending (pages 22-23) <a href="#">Sustainability Report</a> : Sustainable Finance — Our Approach (pages 30-33)



SASB Disclosure	Accounting Metric	2023 Disclosure
<b>Incorporation of ESG Factors in Investment Banking &amp; Brokerage Activities</b>		
FN-IB-410a.2	(1) Number and (2) total value of investments and loans incorporating integration of ESG factors, by industry	<p><a href="#">Sustainability Report</a>: E&amp;S Risk Management in Lending (pages 22-23)</p> <p><a href="#">Sustainability Report</a>: Sustainable Finance — Our Approach (pages 30-33)</p> <p><a href="#">Sustainability Report</a>: Sustainable Finance Highlights — Bond Underwriting (page 36)</p> <p>TD does not disclose the number of investments and loans incorporating integration of ESG factors by industry.</p>
FN-IB-410a.3	Description of approach to incorporation of ESG factors in investment banking and brokerage activities	<p><a href="#">Sustainability Report</a>: Sustainability Highlights Across Our Business — TD Securities (page 8)</p> <p><a href="#">Sustainability Report</a>: Sustainable Finance — ESG Advisory and Client-Focused Solutions - A Spotlight on TD Securities (page 34)</p> <p><a href="#">Sustainability Report</a>: E&amp;S Risk Review (page 77)</p>
<b>Environmental Risk Exposure</b>		
FN-IN-450a.2	Total amount of monetary losses attributable to insurance payouts from (1) modelled natural catastrophes and (2) non-modelled natural catastrophes, by type of event and geographic segment (net and gross of reinsurance)	<p><a href="#">AR</a>: Note 21: Insurance (page 201)</p> <p>TD does not disclose amounts specifically related to catastrophes, modelled or unmodelled. Furthermore, TD does not disclose breakdown by type of events, or geographical segments.</p>
<b>Policies Designed to Incentivize Responsible Behaviour</b>		
FN-IN-410b.2	Discussion of products and/or product features that incentivize health, safety, and/or environmentally responsible actions and/or behaviours	<p><a href="#">Principles for Sustainable Insurance — Annual Disclosure 2023</a></p> <p><a href="#">Sustainability Report</a>: Insurance (pages 39-40)</p> <p><a href="#">Sustainability Report</a>: Product and Service Responsibility (page 28)</p>
<b>Employee Incentives &amp; Risk Taking</b>		
FN-IB-550b.1	Percentage of total remuneration that is variable for Material Risk Takers (MRTs)	<a href="#">PC</a> : Material Risk Takers (page 68)
FN-IB-550b.2	Percentage of variable remuneration of MRTs to which malus or clawback provisions were applied	<a href="#">PC</a> : Reduction, Forfeiture, and Clawback of Variable Compensation (page 66)
FN-IB-550b.3	Discussion of policies around supervision, control, and validation of traders' pricing of Level 3 assets and liabilities	<p><a href="#">AR</a>: Note 5: Fair Value Measurements — Valuation Governance (page 158)</p> <p>TD discusses governance practice around the valuation of its financial instruments in general and not specifically to Level 3 assets and liabilities within the Investment Banking business.</p>
<b>Employee Diversity &amp; Inclusion</b>		
FN-AC-330a.1 FN-IB-330a.1	Percentage of gender and racial/ethnic group representation for (1) executive management, (2) nonexecutive management, (3) professionals, and (4) all other employees	<a href="#">Sustainability Report</a> : TD's Board of Directors (page 75); Employment Access — Total Executive Appointments, Board Diversity, Workforce Diversity (pages 89-91)