

TD Bank Group Statement on Anti-Money Laundering, Anti-terrorist Financing and Sanctions

The Toronto-Dominion Bank and its subsidiaries (collectively known as TD Bank Group or TD) are committed to combatting money laundering, terrorist financing, and sanctions evasion. This commitment is formalized through a risk-based Financial Crime Risk Management (FCRM) Program that is designed to prevent, detect, and report financial crime risk.

TD's FCRM Program is overseen by the Global Head of FCRM, who serves as the Board-approved Chief Anti-Money Laundering Officer (CAMLO) and U.S. Bank Secrecy Act (BSA) Officer. The Program sets clear requirements and minimum standards across the organization and utilizes a "three lines of defence" model to enable robust oversight and accountability for financial crime risks. The first line owns, manages and monitors risks, and implements and executes controls and processes defined by the second line. The second line establishes policies, standards and guidance, oversees program execution, and provides reporting to the Board of Directors. The third line, Internal Audit, independently assesses the effectiveness of policies, procedures, and controls, enabling remediation and transparent reporting to the Board of Directors.

TD's FCRM Program is designed to drive effective risk management and comprehensive coverage of regulatory requirements, including but not limited to:

1. Board and Senior Management oversight of the FCRM Program;
2. Policies and standards that address applicable AML/ATF and sanctions laws, rules, and regulations;
3. Procedures, processes, and systems designed to execute against TD's policies and standards;
4. AML/ATF and Sanctions training for employees, directors, and those who act on behalf of TD;
5. Know Your Customer (KYC) requirements that enable TD to verify the identity of its clients and that provide for ongoing and risk-based client due diligence throughout the client relationship;
6. Risk-based monitoring of clients' transactional activities to detect and report to applicable authorities, instances of suspicious activity, terrorist financing, and transactions or activities prohibited by sanctions;
7. FCRM Risk Assessments based on a methodology to identify and assess money laundering, terrorist financing, and sanctions risk exposure and the effectiveness of controls to mitigate such risks; and
8. Independent testing of the FCRM Program by Internal Audit.
9. TD's FCRM Program is designed to prevent, detect, and report money laundering, terrorist financing, and sanctions evasion and comply with applicable laws, rules, and regulations. The remediation and implementation of an effective and sustainable AML/ATF Program remains TD's top priority.

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