

## Statement on Anti-Corruption

The Toronto-Dominion Bank and all of its subsidiaries (collectively known as “TD”) is committed to conducting its affairs in compliance with all laws and regulations applicable to its operations around the world and to the highest standards of ethics, integrity, honesty, fairness and professionalism. Legislation in Canada and other jurisdictions where TD operates prohibits bribery and corrupt activities. As such, TD implemented an Anti-Bribery and Anti-Corruption program (“Program”) with our global footprint in mind. The legislation and related guidance considered in our Program includes:

- Canada’s *Corruption of Foreign Public Officials Act* and *Criminal Code*;
- The U.S. *Foreign Corrupt Practices Act*; and
- The U.K. *Bribery Act*.

TD has implemented a Board approved global Anti-Bribery Anti-Corruption Policy (“ABAC Policy”) which is reviewed at a minimum, every two years. Responsibility for the ABAC Policy resides with the Global Chief Anti-Money Laundering Officer.

### **Anti-Bribery and Anti-Corruption Program**

Safeguarding TD’s reputation and complying with applicable legal and regulatory requirements is the responsibility of every employee and director. That is why TD’s Program incorporates the following elements:

- Global ABAC Policy and Standards establishing TD’s zero tolerance for bribery and corruption, including the prohibition of facilitation payments;
- Mandatory annual awareness training;
- Internal controls, including but not limited to:
  - Pre-approval requirements for specified gifts and hospitality;
  - Third-party (e.g., vendors and agents) due diligence; and
  - Employee screening.
- Periodic risk assessment to determine risk exposure;
- Internal points of escalation, incident management and reporting, and a confidential whistleblower hotline;
- A Code of Conduct and Ethics, with Anti-Bribery and Anti-Corruption stipulations, requiring an annual attestation by all eligible employees, contract workers and directors; and
- Independent monitoring and periodic review to assess the effectiveness of the Program.

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