

# TD Bank Group: Slavery and Human Trafficking Statement<sup>1</sup>

## Our Commitment to Human Rights

In every country in which TD operates, we support and respect the protection of human rights and comply with applicable local laws, including those related to human rights. We also share the values reflected in international proclamations about human rights, such as the Universal Declaration of Human Rights. We recognize that slavery and trafficking, in all forms, represent a violation of fundamental human rights.

Building on this framework, in 2020, TD released our [Statement on Human Rights](#). The Statement recognizes the framework established by the United Nations Guiding Principles on Business and Human Rights (UNGP), which sets out the corporate responsibility to respect human rights. We also continue to participate in Business for Social Responsibility's (BSR)<sup>2</sup> Human Rights Working Group, which supports companies with implementation.

## About TD

Headquartered in Toronto, Canada, with more than 90,000 employees in offices around the world, The Toronto-Dominion Bank and its subsidiaries are collectively known as TD Bank Group (TD). TD is the fifth largest bank in North America by total assets and serves more than 26 million customers in three key businesses operating in a number of locations in financial centres around the globe: Canadian Retail, U.S. Retail and Wholesale Banking. TD also ranks among the world's leading online financial services firms, with more than 14 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 in business operations, professional services, information and technology, human resources, travel and marketing, and real estate. We apply enhanced due diligence to sourcing products and services that are higher risk for social, ethical, environmental and geographical elements. Suppliers who provide higher risk products and services are asked to complete detailed questionnaires. 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

While reaching our business goals is critical to TD's success, the way by which we achieve them is equally important. 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 adhere to and in many cases exceed all 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 and unlawful discrimination, where every employee, customer, client, and third-party worker is treated with dignity and respect.

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.

Under the [TD Code of Conduct and Ethics](#), every eligible employee and director of TD is expected and required to assess every business decision and every action on behalf of the organization in light of whether it is right, legal and fair and within our risk appetite.

To help us deliver on this commitment, 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 independently managed within TD. TD employees may also contact the Employee Ombudsman (known as the Between Us program) for confidential, informal and impartial guidance on how to report a concern.

In addition, TD has adopted policies with respect to [Anti-Money Laundering and Anti-Terrorist Financing \(AML/ATF\)](#), and [Anti-Bribery and Anti-Corruption](#). This framework of policies and procedures 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, including Project Protect<sup>3</sup> in Canada, to combat human trafficking.

Environmental and social issues, such as human rights, are also addressed within our business risk frameworks. For example, TD's Environmental and Social Risk Assessment Tool includes due diligence tools that include human rights considerations. In addition, TD follows international environmental and social risk management frameworks, such as the Equator Principles.

<sup>1</sup> This statement is made pursuant to section 54(1) of the United Kingdom Modern Slavery Act on behalf of TD Bank Group subject to the Act, 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, 2020.

<sup>2</sup> Business for Social Responsibility (BSR) is a global non-profit organization that works with its network of member companies to build a just and sustainable world. BSR develops sustainable business strategies and solutions through consulting, research and cross-sector collaboration.

<sup>3</sup> Launched in 2016, Project Protect is a public-private partnership between the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) and Canada's major banks to identify financial transactions and patterns of activities that may give rise to suspicions of money laundering related to human trafficking.



## TD Bank Group: Slavery and Human Trafficking Statement (continued)

### Our Suppliers

Our commitment to human rights 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.

Suppliers are expected to have guidelines, policies and practices that are communicated throughout their organization, upheld by all levels of management, and are considered and applied to their own supply chain activities.

These must address 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.

TD's Supplier Code of Conduct establishes our expectations for the minimum performance standards and obligations that suppliers and their subcontractors must meet in order to do business with TD. Within TD's Supplier Code of Conduct, there are six criteria that are related to the issue of modern slavery and human trafficking:

<b>Protection of Human Rights</b>	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 of a person's race, colour, sex, sexual orientation, gender identity, national origin, religion, veteran status, marital status or disability)
<b>Protection of Health and Safety</b>	A culture of safety and supporting practices, minimizing risk of injury, illness, or death, and documented safety procedures (including accident reporting and emergency evacuation)
<b>Fair Labour Practices</b>	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
<b>Code of Conduct and Ethics</b>	Guidelines for workplace performance that define organizational expectations in respect of ethical, moral, and legal behaviours
<b>Legal and Regulatory Compliance</b>	Compliance with applicable laws and regulatory requirements applicable to supplier and to goods and services being provided
<b>Corporate Responsibility</b>	Policies, practices and relevant reporting that demonstrate a commitment to corporate responsibility for environmental, social and ethical matters

TD extends its responsible procurement agenda further into the supply chain by applying enhanced due diligence to sourcing products and services when social, ethical, environmental and geographical factors suggest higher risk.

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. In 2020, as a result of our assessment, suppliers who were shown to not have adequate training in accordance with international best practices have committed to implementing enhancements. Going forward, we continue to work with our hotel suppliers on this initiative.

In 2020, we continued to improve due diligence processes in our supply chain by developing a Responsible Sourcing Due Diligence Guideline for TD-Branded Merchandise Vendors. Effective June 1, 2021, this guideline outlines the requirement to have independent third-party audits for social issues, such as forced labour, for any promotional products being supplied to TD.

### Summary

We are committed to conducting our affairs to the highest standards of ethics and will continue to promote a culture of high integrity at TD. 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 is reviewed and updated annually.



Bharat Masrani, March 2021

