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

The Toronto-Dominion Bank and its subsidiaries, collectively known as TD, are committed to detecting and deterring persons engaged in money laundering or terrorist financing from using TD products or services. TD is equally committed to compliance with economic sanctions laws and regulations. This commitment is honoured through the establishment of an enterprise-wide Anti-Money Laundering / Anti-Terrorist Financing (AML/ATF) and Sanctions risk and compliance management program (Global AML Program) that is designed to detect and report suspected money laundering and terrorist financing and activity prohibited by sanctions.

TD is subject to, and bound to comply with, the AML/ATF and Sanctions laws and regulations in each of the jurisdictions in which it operates. A Chief Anti-Money Laundering Officer (CAMLO) and a Bank Security Act (BSA) Officer, collectively referred to as the Co-Heads AML Compliance, have been appointed and are responsible to Senior Management and the Board of Directors for establishing and maintaining the Global AML Program, which establishes requirements and minimum standards across all TD businesses worldwide.

In accordance with legislative and regulatory requirements, the Global AML Program and supporting policies set out requirements that include:

1. Board and Senior Management oversight of the Global AML Program,
2. Documented policies and procedures that address both enterprise policy and applicable AML/ATF and Sanctions regulatory requirements,
3. Identification of customers,
4. Customer and transaction record keeping,
5. Ongoing monitoring to detect and report suspicious transactions or activities,
6. Customer and transaction screening against terrorist and other sanctions watch-lists,
7. Regulatory reporting of prescribed transactions, including cash transactions, international electronic funds transfers, cross-border movements of cash and monetary instruments, as well as terrorist and other frozen property and rejected transactions,
8. Ongoing training for employees, directors and those who act on behalf of TD,
9. Assessment of money laundering, terrorist financing and sanctions risks; and
10. Independent testing of control effectiveness.

The Global AML Program is routinely evaluated, updated and enhanced in order to reflect changes to TD's business activities, as well as applicable supervisory standards and legal requirements.

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