

TD Bank Group: Slavery and Human Trafficking Statement¹

About TD

Headquartered in Toronto, Canada, with more than 85,000 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 branches 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 13 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.

Our Commitment to Human Rights

In every country in which TD operates, we support and respect the protection of 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 of its forms, represents a violation of fundamental human rights.

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 to work in the applicable country.

TD's Respectful Workplace Policy articulates our commitment to provide a work environment free from any form of 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.

To help us deliver on this commitment, TD's Whistleblower 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 Whistleblower 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).

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 are 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 actively participates in public-private initiatives, including Project Protect² in Canada, to combat human trafficking.

Finally, TD educates employees on relevant human rights issues through various communications and learning programs, including diversity and inclusion training. We view diversity and inclusion as a business imperative and our objective is to be an inclusive bank – one that understands, honours and values the diversity of our customers, employees and the communities in which we live and work. We strive to create and nurture a unique and inclusive employee culture.

Our Suppliers

Our commitment to human rights is also reflected in the suppliers we choose. 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;
- Corporate responsibility; and
- Supplier diversity.

¹ This statement is made pursuant to section 54(1) of the United Kingdom *Modern Slavery Act* on behalf of TD Bank Group and its subsidiaries subject to the Act, and excludes TD's investment in TD Ameritrade. It constitutes TD Bank Group's Slavery and Human Trafficking Statement for the fiscal year ending October 31, 2019.

² 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.



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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.

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:

Protection of human rights:	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 or disability)
Protection of health and safety:	A culture of safety and supporting practices, minimizing risk of injury, illness or death, and documented safety procedures (including accident reporting and emergency evacuation)
Fair labour practices:	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
Code of conduct and ethics:	Guidelines for workplace performance that define organizational expectations in respect of ethical, moral, and legal behaviours
Legal and regulatory compliance:	Compliance with applicable laws and regulatory requirements applicable to supplier, and to goods and services being provided
Corporate responsibility:	Policies and practices that demonstrate a commitment to corporate responsibility for environmental, social and ethical matters

2019 Updates

TD developed an [Inclusive and Sustainable Event Guide](#) to assist TD in meeting its goal of hosting events that have a minimal environmental impact, are inclusive and accessible, and align with TD's values and the TD Ready Commitment. We included specific questions related to human trafficking in our event guide that can be used by TD's event planners when engaging a venue or third-party supplier.

We continue to participate in Business for Social Responsibility's (BSR) Human Rights Working Group which supports companies in implementing the United Nations Guiding Principles on Business and Human Rights.

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 will be reviewed and updated annually.



Bharat Masrani, March 2020

