

## TD Bank Group Statement on Anti-Corruption

The Toronto-Dominion Bank and its subsidiaries (collectively known as TD Bank Group or TD) are committed to conducting their 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 corruption activities. As such, TD implemented a Global Anti-Bribery and Anti-Corruption program (Global ABAC Program) with our global footprint in mind. The legislation and related guidance considered in our Global ABAC 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*.

The Global ABAC Program employs a three lines of defence model that emphasizes and balances strong independent oversight with clear accountabilities for, and ownership of, bribery and corruption risk within TD. The first line of defence is the risk owner, the second line provides risk oversight and the third is internal audit.

TD has a Board of Directors-approved Enterprise Anti-Bribery and Anti-Corruption Policy (ABAC Policy), which is currently reviewed every two years at a minimum. Starting May 2025, the ABAC Policy will be reviewed annually. Responsibility for the ABAC Policy resides with the Chief ABAC Officer.

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

Safeguarding TD's reputation and complying with applicable legal and regulatory requirements are the responsibilities of every employee and director. That is why TD's Global ABAC Program incorporates the following elements:

1. ABAC Policy and Standards establishing TD's zero tolerance for bribery and corruption, including the prohibition of facilitation payments;
2. Ongoing training for colleagues, directors and those who act on behalf of TD;
3. 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;
4. Assessment of bribery and corruption risks;
5. Internal points of escalation, incident management and reporting, and a confidential whistleblower hotline;
6. A Code of Conduct and Ethics, with Anti-Bribery and Anti-Corruption stipulations, requiring an annual attestation by all eligible employees, third-party workers and directors; and
7. Independent testing and periodic review to assess the effectiveness of the Global ABAC Program.

The Global ABAC Program is routinely evaluated, and if appropriate, updated or revised in order to reflect changes to TD's business activities, as well as applicable legal requirements.

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