

## Toronto Dominion (South East Asia) Limited: Modern Slavery Statement

### Introduction

Pursuant to Australia's Commonwealth Modern Slavery Act 2018 ('Act'), Toronto Dominion (South East Asia) Limited ('TDSEA', 'we', 'us' or 'our') provides this statement on the measures taken by TDSEA in the fiscal year ended October 31, 2021, to address the risks of modern slavery in TDSEA's global operations.

### About TDSEA

TDSEA is a limited liability company incorporated and domiciled in Singapore. TDSEA does not own or control other entities.

TDSEA's immediate and ultimate holding company is the Toronto-Dominion Bank, which is incorporated in Canada. The Toronto-Dominion Bank and its subsidiaries are collectively known as TD Bank Group ('TD'). TD's operations are integrated globally, with core risk management policies and procedures established at a global level ('Enterprise Risk Framework'), which are implemented by group companies like TDSEA. TD's Enterprise Risk Framework sets the direction of how TD manages enterprise risk which includes the management of environmental and social risk. TD is not a reporting entity under the Act.

TDSEA is headquartered in Singapore and has approximately 100 employees. TDSEA provides a range of capital markets products and services to corporate, government, and institutional clients.

TDSEA directly engages with a limited number of suppliers ('Suppliers') for services and products in a limited number of categories such as business operations, professional services, information and technology, human resources, travel and marketing, and real estate.

### Risks of Modern Slavery in our Global Operations

TDSEA's workforce is made up of professionally qualified and highly skilled employees located in Singapore. Based on the composition of our workforce, the nature of the industry they work in (i.e., financial services industry), as well as their geographic location, the risk of modern slavery practices within our own global operations is considered low.

Most of TDSEA's Suppliers are providers of professional services located in Singapore. The other few Suppliers are located in the following countries: Japan, Australia, Canada, New Zealand, Hong Kong, United Kingdom, U.S., and Belgium. We recognize that the jurisdictions in which TDSEA's Suppliers are located are not generally identified as high-risk for modern slavery. On that basis, we believe that the risk of modern slavery in our Suppliers' operations are low.

### Our Policies, Due Diligence Processes and Training Practices

TDSEA is committed to supporting and respecting the protection of human rights.

We comply with all human-rights related laws in the countries in which we operate. How we achieve our business goals matters as much as our business goals themselves. 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 abide by all applicable labour laws and standards addressing issues such as equal pay, hours of work and child labour. Where TDSEA enters into an agreement with a staffing agency for the agency to assign individuals to perform work on TDSEA's behalf, TDSEA requires that the agency represent that all such individuals are eligible and approved to work in the applicable country.

TDSEA adheres to TD's Respectful Workplace Policy which articulates a commitment to provide a work environment free from any form of violence, harassment and discrimination, where every employee, customer, client, and third-party worker is treated with dignity and respect.

TDSEA is subject to TD's Code of Conduct and Ethics, under which all covered individuals are required to assess whether business decisions and actions on behalf of the organization are right, legal and fair and within the organization's risk appetite.

To help us deliver on this commitment, TD's Conduct and Ethics Hotline provides a confidential and anonymous reporting channel to our employees, customers, third-party workers, and members of the public to report their concerns regarding our organization 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 is independently managed within TD.

TDSEA employees may also contact the "Between US: Employee Ombudsman Office" for confidential, informal and impartial guidance on how to report a concern.

TDSEA 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 TDSEA's 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. All of our employees participate in TD's AML/ATF training program which includes examples that highlight the risk of money laundering transactions relating to human trafficking activities.

## Our Suppliers

Our commitment to human rights is also reflected in the Suppliers we choose to directly engage with. TDSEA is committed to sourcing products and services from Suppliers who respect human rights, ethics, and the environment and have responsible policies and practices.

We apply TD's Supplier Code of Conduct which reflects and frames the values and standards that we expect suppliers and their subcontractors to adhere to when engaged in business with us. Within TD's Supplier Code of Conduct suppliers are expected to have guidelines, policies and practices in relation to the following:

- Protection of human rights
- Diversity and inclusion
- Privacy and confidentiality
- Protection of health and safety
- Anti-bribery/anti-corruption
- Accessibility
- Fair labour practices
- Environmental sustainability
- Corporate responsibility
- Code of conduct and ethics
- Legal and regulatory compliance
- Supplier diversity



When registering Suppliers, we request that they confirm that they operate in accordance with the expectations described in the TD Supplier Code of Conduct, including protection of human rights.

As part of our responsible sourcing program, we may apply enhanced due diligence on parts of our supply chain that are most relevant to ESG issues.

### **Assessing our Effectiveness**

We recognize that our review and assessment of our actions to identify and address any modern slavery risks in our operations and in those of our Suppliers will be an ongoing and evolving process.

### **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 TDSEA. We believe TDSEA has appropriate policies and practices to address the risk of slavery and human trafficking in its business activities and supply chain.

For purposes of complying with Australia's Commonwealth Modern Slavery Act 2018, this statement constitutes TDSEA's requisite annual "Modern Slavery Statement" for the financial year ended October 31, 2021 and has been approved by the Board of Directors of TDSEA on April 27, 2022 and has been signed on behalf of the Board by Mr. Jayant Jobanputra, Director and Managing Director and Regional Head, Asia Pacific.



Jayant Jobanputra  
Managing Director & Regional Head, Asia-Pacific  
28 April 2022

