



Modern Slavery Statement submitted on behalf of TD Asset Management Inc. and Epoch Investment Partners, Inc.

Introduction

This statement is published under section 14 of Australia's *Modern Slavery Act 2018* (the 'Act') on behalf of TD Asset Management Inc. ('TDAM') and Epoch Investment Partners, Inc. ('TD Epoch') (collectively, 'we', 'us' or 'our'). This statement addresses the approaches and measures taken by these entities' during fiscal year ending October 31, 2024 that help to mitigate risks of modern slavery¹ and human trafficking in their respective businesses and supply chains.

1. Our Structure, Operations and Supply Chains

TDAM is an asset manager based in Canada providing investment solutions to corporations, pension funds, endowments and foundations, and manages assets on behalf of retail investors through affiliated and third-party dealers.

TD Epoch is an asset manager headquartered in New York managing assets on behalf of institutional investors including corporate and state pension funds, endowments, insurance companies and other financial institutions as well as high net worth clients. TD Epoch has a branch office in Australia where one professional is based.

TDAM and TD Epoch are wholly-owned subsidiaries of 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 that are established at a global level (the Enterprise Risk Framework) and implemented by TD subsidiaries such as TDAM and TD Epoch. The TD Enterprise Risk Framework sets the direction for how TD manages enterprise risk, which includes the management of environmental and social risk. TD is not a reporting entity under the Act.

TDAM and TD Epoch directly engage with a limited number of suppliers for services and products in a limited number of categories such as business operations, professional services, information technology and marketing.

Our workforces are comprised mainly of financial services professionals based predominantly in Canada and the United States of America (the 'US').

Our spending on the procurement of goods and services from third-party suppliers goes primarily to suppliers based in Canada and the US. Our suppliers provide a range of goods and services such as IT services, office supplies, consulting and advisory services, and financial transaction services.

2. Modern Slavery Risks in Our Business and Supply Chains

We recognize that human rights observers² have identified the potential for modern slavery and human trafficking in the production of goods and third party services, some of which may exist in our supply

¹ We use the term "modern slavery" to refer to forced labour, child labour and other forms of slavery.

² Based on the higher-risk goods and countries identified in Walk Free's Global Slavery Index, and the US Department of Labor's List of Goods Produced by Child Labor or Forced Labour.



chains, such as electronics, office furniture, and garments; in third-party services such as staffing agencies, offshoring services, and hospitality services; and in the production of materials that may be present in those goods, such as steel, timber, and textiles. There is also a risk that financial services could be used directly or indirectly to support activities related to modern slavery or human trafficking.

3. Measures to Assess and Address Modern Slavery Risks

TDAM and TD Epoch adhere to a number of relevant TD policies, due diligence processes, and training programs that help mitigate the risk of modern slavery and human trafficking in our business and supply chains. These are outlined below in section 3.1.³ We recognize, however, that we can always look for improvements.

3.1 Policies, Training and Due Diligence Processes

Our relevant policies, due diligence processes and training programs can be divided into those concerning our third party suppliers, our employees, and the services we provide to our clients.

Our Third Party Suppliers

New or prospective third party suppliers providing goods or services through TD's centralized Strategic Sourcing Group (SSG) must register through an enterprise procurement system requiring them to represent to TD that they operate in accordance with the expectations described in our Supplier Code of Conduct, including those relating to the protection of human rights and fair labour practices. Our contracting standards for negotiated contracts (generally for transactions that are considered high- or medium-risk based on specified criteria), and contract templates also require third parties to comply with applicable laws and to refrain from engaging in any unfair, deceptive, abusive, or unethical business practices.

The Supplier Code of Conduct reflects and frames the values and standards that we expect third parties and their subcontractors to comply with when engaging in business with us. Specifically, third parties are expected to have guidelines, policies and practices that are communicated throughout their organization, upheld by all levels of management, and considered and applied to their own supply chain activities, which address the following:

- Legal compliance;
- Respect for human rights;
- Fair labour practices;
- Protection of health and safety;
- Code of conduct and ethics;
- Non-discrimination;
- Financial crime;
- Conflicts of interest;
- Sustainability;

³ These policies, due diligence processes, and training programs apply enterprise-wide to TD and the subsidiaries covered by this statement.



- Privacy and confidentiality;
- Accessibility;
- Corporate responsibility;
- Reporting violations;
- Books and records; and
- Supplier diversity.

Within the Supplier Code of Conduct, there are six criteria relevant to the issues of modern slavery:

Legal Compliance	Compliance with applicable laws, regulatory requirements, and contractual obligations applicable to the supplier that relate to the goods and services being provided to TD.
Respect for Human Rights	Respect for internationally recognized human rights, including rights to life and liberty, and security of person, freedom of thought and expression, and equality.
Fair Labour Practices	Compliance with applicable labour and employment laws, including those relating to wage rates and conditions of employment. No tolerance for use of any form of child labour, forced labour, human trafficking or other forms of modern slavery in any operations, facilities or supply chain.
Protection of Health and Safety	Measures that provide and maintain safe and healthy working environments and conditions, and which comply with applicable health and safety laws. A culture that promotes safety practices which aim to minimize risks of accidents, injuries, illnesses, or death. Documented health and safety instructions and measures (including accident reporting and emergency evacuation).
Code of Conduct and Ethics	Guidelines for workplace performance that define organizational expectations in respect of ethical, moral, and legal behaviour.
Corporate Responsibility	Policies, practices and relevant reporting that demonstrate a commitment to corporate responsibility for environmental, social and ethical matters.

We apply a risk-based approach in the ordinary course of making business decisions, including when onboarding third party suppliers. Risk identification and assessment processes are a core part of how TD manages risk and are embedded throughout the organization. With respect to our third party suppliers, we take a measured, risk-based approach to onboarding and make decisions to onboard based on the risks presented by an individual third party and TD's ability to manage those risks.

In fiscal 2024, TD undertook a review of its third party risk management practices with the aim of making risk-based and appropriately calibrated enhancements to our third party risk management processes to assess for the risk of modern slavery in our supply chains. This review resulted in changes to our process to provide more holistic coverage of our third party suppliers, which includes integrating our assessments and monitoring of their current environmental, social and governance (ESG) practices into TD's third party risk management program. This allows for us to move from spot assessments to recurring assessments of particular third parties on a risk-based approach.



Our Employees and Business

We strive to abide by applicable labour laws and standards, addressing issues such as discrimination, equal pay, hours of work and child labour. Where TD enters into agreements with staffing agencies and offshoring services providers to assign individuals to perform work on TD's behalf, TD requires that the third parties represent that all such individuals are eligible and approved to work in the applicable country.

In addition, TD's Respectful Workplace Policy requires that all TD employees, directors and third-party workers performing work for TD treat all third-party workers, or other persons who are in, or are seeking to have, a business relationship with TD, with dignity and respect and without harassment, discrimination, or violence.

Under TD's Code of Conduct and Ethics, every employee and member of the Board of Directors of TD, including directors of wholly-owned TD subsidiaries, is required to assess whether business decisions and actions on behalf of the organization are right, legal and fair and within our risk appetite. The Code of Conduct and Ethics reaffirms the commitments in TD's Statement on Human Rights, as well as the requirements of the Respectful Workplace Policy noted above. All active employees and directors are required to complete annual Code of Conduct and Ethics training and to annually attest to compliance.

Services We Provide to Clients

TD recognizes that the financial system within which we operate in and the services that we provide may be exploited in the pursuit of illegal activities. With a diversity of clients across multiple jurisdictions, we recognize the risks associated with transactions performed by our clients that may be related to modern slavery and human trafficking. TD's anti-money laundering (AML)/Anti-Terrorist Financing (ATF), Sanctions and Anti-Bribery and Anti-Corruption (ABAC) program (the AML Program) is a second line function that develops enterprise standards, policies and procedures designed to: detect and deter the use of TD products and services for money-laundering and terrorist financing activities, including human trafficking, comply with AML/ATF⁴ and economic sanctions laws and regulations, and provide principles of conduct to detect and deter bribery and corruption activities. As part of the AML Program, all TD employees are required to complete annual AML/ATF trainings which include examples highlighting the risk of money laundering transactions relating to human trafficking activities. TD's AML Program defines a risk-based approach for monitoring customer transactions to identify potentially suspicious and/or unusual transactions which are reviewed by TD's Financial Intelligence Unit (FIU) and, if needed, escalated to TD's Finance Crime Risk Management (FCRM) team for further review. Where there are reasonable grounds to suspect that the activity/transaction(s) are related to the commission of a money laundering or terrorist financing offence, FCRM is required to report this to the appropriate authorities in accordance with applicable laws. TD also participates in public-private partnership projects aimed at disrupting financial transactions associated with financial crime including human trafficking.

⁴ TD is undertaking a remediation of its U.S. Bank Secrecy Act (BSA) / AML Program and undertaking several improvements to its enterprise-wide AML Program. Refer to the TD Bank Group 2024 Annual Report for further information on the BSA/AML Program remediation and Enterprise AML Program improvements.



Social issues, which may include human rights considerations, are also addressed within our business risk frameworks and processes. TD's Enterprise Risk Framework outlines how TD governs and manages risk, including social risk, and is supported by frameworks, policies, procedures and practices to identify, assess, measure, control, monitor and report on risks. TD applies a risk-based approach in the ordinary course of making business decisions; risk identification and assessment processes are a core part of how the TD manages risk and these processes are embedded throughout the organization in governance processes, risk programs and practices. As with any other financial or non-financial risk, TD has developed tools to identify, assess, monitor, mitigate and report risks, including social risks.

3.2 Remediation

The TD Conduct and Ethics Hotline provides a confidential and anonymous reporting channel for anyone, both internal and external to TD, to report concerns regarding ethical or legal matters without fear of retaliation. Additionally, concerns may also be reported by contacting:

TDAM clients: The customer service channels outlined on the [Resolving Your Complaints](#) webpage.
TD Epoch clients: Your Relationship Manager.

The Code of Conduct and Ethics requires TD employees and board members to immediately report any conduct of which they are aware, or which they suspect, violates this code. TDAM and TD Epoch employees may contact the Between Us: Employee Ombudsman Office for confidential, informal and impartial guidance on how to report a concern.

TD's contracting standards for negotiated contracts (generally high - or medium-risk transactions based on specified criteria) and contract templates include: (a) an obligation for the third party to comply with applicable laws, notify TD if the third party is subject to an enforcement or other regulatory action or is otherwise charged with a failure to comply with law or regulatory action, and inform TD of its remediation plans; and (b) TD's right to terminate the contract for cause, which would include the third party's failure to comply with applicable laws.

3.3 Assessing the Effectiveness of Our Approach

TD regularly reviews its policies and approaches to risk management in respect of ESG issues, which may include modern slavery and human trafficking, and may make changes where indicators suggest a need for improvement.

Steps taken to assess TD's effectiveness may include monitoring and reporting of any complaints or claims received through TD's reporting channels described under the 'Remediation' section of this statement, findings from TD's internal risk management processes and feedback from internal and external stakeholders.



4. Our Consultation and Governance Process

In order to prepare this statement, we consulted with each covered entity (as well as the entities we own or control) and with key areas of the organization including Environmental and Social Risk Management, Strategic Sourcing, Sustainability & Corporate Citizenship and Legal.

This statement was approved by the Board of Directors of TDAM on April 9, 2025 and by the Board of Directors of TD Epoch on March 19, 2025 and has been signed on behalf of each Board by their respective authorized directors.

TD Asset Management Inc.

A handwritten signature in black ink, appearing to read 'Bruce Cooper', written over a horizontal line.

By: Bruce Cooper

Title: CEO

Date: April 11, 2025

Epoch Investment Partners, Inc.

A handwritten signature in black ink, appearing to read 'Bruce Cooper', written over a horizontal line.

By: Bruce Cooper

Title: CEO

Date: April 11, 2025