



Modern Slavery Statement submitted on behalf of Toronto Dominion (South East Asia) Limited and TD Securities (USA) LLC:

Introduction

Pursuant to Australia's Commonwealth *Modern Slavery Act 2018* (the 'Act'), Toronto Dominion (South East Asia) Limited ('TDSEA') and TD Securities (USA) LLC ('TDS USA') (collectively, 'we', 'us' or 'our') provide this statement on the measures taken by TDSEA and TDS USA in the fiscal year ended October 31, 2022, to address the risks of modern slavery in their global operations.

About TDSEA and TDS USA

TDSEA is a limited liability company incorporated and domiciled in Singapore. TDSEA does not own or control other entities. TDS USA is a limited liability company formed and domiciled in the United States of America and it does not own or control any other entities.

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

TDSEA is headquartered in Singapore and has approximately 110 employees. TDS USA is headquartered in the US and has approximately 1,300 employees in the US. TDSEA and TDS USA provide a range of capital markets products and services to corporate, government, and institutional clients.

We directly engage 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, while the workforce for TDS USA is comprised of professionally qualified and highly skilled employees located in the US. 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 low.

Most of TDSEA's Suppliers are providers of professional services located in Singapore, and TDS USA sources its Suppliers of professional services mainly from the US. The other few Suppliers are in locations such as Canada, United Kingdom and Australia. We recognize that the jurisdictions in which our 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 is low.

Our Policies, Due Diligence Processes and Training Practices

We are committed to supporting and respecting the protection of human rights.



We comply with applicable local laws, including those related to human rights. We also 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 applicable labour laws and standards, addressing issues such as discrimination, equal pay, hours of work and child labour. Where we enter into an agreement with a staffing agency for the agency to assign individuals to perform work on our behalf, we require that the agency represent that all such individuals are eligible and approved to work in the applicable country.

TDSEA and TDS USA adhere to TDBG'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. All employees are also required to complete annual Code of Conduct and Ethics training and attest to ongoing compliance.

TDSEA and TDS USA are subject to TDBG'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.

TDBG'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. TDBG's Conduct and Ethics Hotline is hosted by a third-party and is independently managed within TDBG.

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

We have adopted policies with respect to Anti-Money Laundering and Anti-Terrorist Financing (AML/ATF; see TDBG's Statement on Anti-Money Laundering, Anti-Terrorist Financing and Sanctions), and Anti-Bribery and Anti-Corruption (see TDBG's Statement on Anti-Corruption). This framework of policies and procedures is designed to detect and deter the use of TD'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. TDBG employees must complete annual AML/ATF training which includes examples that highlight the risk of money laundering transactions relating to human trafficking activities.

Our Suppliers

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

We apply TDBG'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 TDBG'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 TDBG Supplier Code of Conduct, including protection of human rights.

As part of our responsible sourcing program, we may, where appropriate apply enhanced due diligence on parts of our supply chain related to certain environmental or social 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.

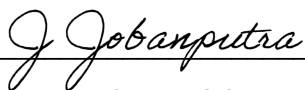
Summary

As a responsible business enterprise and corporate citizen, we are committed to conducting our affairs to the highest standards of ethics, integrity, honesty, fairness, and professionalism. We believe TDSEA and TDS USA have appropriate policies and practices in place, subject to review and continuing assessment as appropriate, 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 TD’s requisite annual “Modern Slavery Statement” for the financial year ended October 31, 2022 and has been approved by the Board of Directors of TDSEA and TDS USA on April 21, 2023, and has been signed on behalf of each Board by their respective authorized officers.

Toronto Dominion (South East Asia) Limited

TD Securities (USA) LLC



By: Jayant Jobanputra
 Title: Managing Director and Regional Head, Asia Pacific
 Date: April 25, 2023



By: Christina Petrou
 Title: Chief Operating Officer
 Date: April 25, 2023