

Market Abuse – Detection and Prevention Statement

May 2024

1. Introduction

This document sets out the arrangements that The Toronto-Dominion Bank (London Branch) and TD Bank Europe Limited (collectively “the Firm”) has in place in connection with the detection and prevention of market abuse and related matters.

2. Scope

The Firm operates in financial markets whose integrity and smooth functioning can be harmed by market manipulation, insider dealing and unlawful disclosure of inside information and other unlawful practices.

3. Detection and Prevention of Market Abuse

The Firm conforms to applicable law and regulations (**Applicable Law**) relating to market abuse, including the Market Abuse Regulation EU 596/2014 (as it forms part of UK domestic law by virtue of the European Union (Withdrawal) Act 2018). The Firm has a zero-tolerance approach to market abuse and has established policies, arrangements, systems and procedures appropriate and proportionate to the scale, size and nature of its business that seek to prevent, detect and report abusive practices or suspicious orders or transactions.

The Firm’s monitoring systems are capable of analysing each and every transaction executed and every order placed, modified, cancelled or rejected, as well as producing alerts against instances which require further analysis. Transactions and orders that have been flagged are subject to further analysis by the Firm’s Compliance function. This will typically include gathering as much relevant information about the trade, including the reasons for the order and any relevant circumstances either in the investment research process, or in news subsequently announced about that issuer and/or financial instrument. The Firm has an open relationship with its regulators, including but without limitation, the Financial Conduct Authority (**FCA**), and liaises with other law enforcement agencies as appropriate. As part of that, Suspicious Transaction and Order Reports (**STORs**) will be submitted to the FCA where appropriate, noting that the following information is required:

- The person submitting (and their capacity in relation to the suspicious trade or order).
- A description of the order or transaction.
- Reasons for suspecting market abuse.
- Identification of any person(s) involved in the suspicious trade (both in the decision to trade and its execution).
- Any other relevant information or supporting documents.

As part of its onboarding and ongoing monitoring requirements, the Firm will request from clients, brokers, and other relevant third parties documentary evidence of adequate surveillance arrangements and a zero-tolerance approach to market abuse.

In ensuring compliance with Applicable Law, the Firm has terminated and will, if appropriate, terminate accounts based on very low thresholds of suspicion of market abuse.