

the Wolfsberg Group

Financial Institution Name:
Location (Country):


The Toronto-Dominion Bank
Canada

No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal name	The Toronto-Dominion Bank (TD)
2	Append a list of foreign branches which are covered by this questionnaire (if applicable)	Refer to Appendix A for full details: Cayman Islands, London, Hong Kong, Singapore, and New York. Refer to Appendix B for a list of subsidiaries also covered by this questionnaire.
3	Full Legal (Registered) Address	66 Wellington Street West, Toronto, Ontario.
4	Full Primary Business Address (if different from above)	66 Wellington Street West, Toronto, Ontario.
5	Date of Entity incorporation/establishment	February 1, 1955
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	Toronto Stock Exchange (TSX:TD) New York Stock Exchange (NYSE:TD)
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	Not Applicable
7	% of the Entity's total shares composed of bearer shares	0
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	Yes
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	The Toronto - Dominion Bank Cayman Islands Branch
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Provide Legal Entity Identifier (LEI) if available	PT3QB789TSUIDF371261
2. AML, CTF & SANCTIONS PROGRAMME		
11	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
11 a	Appointed Officer with sufficient experience/expertise	Yes
11 b	Adverse Information Screening	Yes
11 c	Beneficial Ownership	Yes
11 d	Cash Reporting	Yes
11 e	CDD	Yes
11 f	EDD	Yes

11 g	Independent Testing	Yes
11 h	Periodic Review	Yes
11 i	Policies and Procedures	Yes
11 j	PEP Screening	Yes
11 k	Risk Assessment	Yes
11 l	Sanctions	Yes
11 m	Suspicious Activity Reporting	Yes
11 n	Training and Education	Yes
11 o	Transaction Monitoring	Yes
12	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes
13	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
13 a	If Y, provide further details	See Appendix C
14	Does the entity have a whistleblower policy?	Yes
3. ANTI BRIBERY & CORRUPTION		
15	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
16	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
17	Does the Entity provide mandatory ABC training to:	
17 a	Board and Senior Committee Management	Yes
17 b	1st Line of Defence	Yes
17 c	2nd Line of Defence	Yes
17 d	3rd Line of Defence	Yes
17 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Yes
17 f	Non-employed workers as appropriate (contractors/consultants)	Yes
4. AML, CTF & SANCTIONS POLICIES & PROCEDURES		
18	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
18 a	Money laundering	Yes
18 b	Terrorist financing	Yes
18 c	Sanctions violations	Yes
19	Does the Entity have policies and procedures that:	
19 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
19 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
19 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	No
19 d	Prohibit accounts/relationships with shell banks	Yes
19 e	Prohibit dealing with another Entity that provides services to shell banks	Yes
19 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
19 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
19 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes
19 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
19 j	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes

20	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
21	Does the Entity have record retention procedures that comply with applicable laws?	Yes
21 a	If Y, what is the retention period?	5 years or more
5. KYC, CDD and EDD		
22	Does the Entity verify the identity of the customer?	Yes
23	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes
24	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
24 a	Customer identification	Yes
24 b	Expected activity	Yes
24 c	Nature of business/employment	Yes
24 d	Ownership structure	Yes
24 e	Product usage	Yes
24 f	Purpose and nature of relationship	Yes
24 g	Source of funds	Yes
24 h	Source of wealth	Yes
25	Are each of the following identified:	
25 a	Ultimate beneficial ownership	Yes
25 a1	Are ultimate beneficial owners verified?	No
25 b	Authorised signatories (where applicable)	Yes
25 c	Key controllers	Yes
25 d	Other relevant parties	Yes
26	Does the due diligence process result in customers receiving a risk classification?	Yes
27	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
28	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
29	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
29 a	If yes, select all that apply:	
29 a1	Less than one year	Yes
29 a2	1 – 2 years	Yes
29 a3	3 – 4 years	Yes
29 a4	5 years or more	Yes
29 a5	Trigger-based or perpetual monitoring reviews	Yes
29 a6	Other (please specify)	
30	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
30 a	Arms, Defence, Military	EDD on risk-based approach
30 b	Respondent Banks	EDD on risk-based approach
30 b1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
30 c	Embassies/Consulates	EDD on risk-based approach
30 d	Extractive industries	EDD on risk-based approach
30 e	Gambling customers	EDD on risk-based approach
30 f	General Trading Companies	EDD on risk-based approach
30 g	Marijuana-related Entities	EDD on risk-based approach
30 h	MSB/MVTS customers	EDD on risk-based approach
30 i	Non-account customers	EDD on risk-based approach
30 j	Non-Government Organisations	EDD on risk-based approach
30 k	Non-resident customers	EDD on risk-based approach

30 l	Nuclear power	EDD on risk-based approach
30 m	Payment Service Providers	EDD on risk-based approach
30 n	PEPs	EDD on risk-based approach
30 o	PEP Close Associates	EDD on risk-based approach
30 p	PEP Related	EDD on risk-based approach
30 q	Precious metals and stones	EDD on risk-based approach
30 r	Red light businesses/Adult entertainment	EDD on risk-based approach
30 s	Regulated charities	EDD on risk-based approach
30 t	Shell banks	Prohibited
30 u	Travel and Tour Companies	EDD on risk-based approach
30 v	Unregulated charities	EDD on risk-based approach
30 w	Used Car Dealers	EDD on risk-based approach
30 x	Virtual Asset Service Providers	Do not have this category of customer or industry
30 y	Other (specify)	Examples of Customer Industry types subject to EDD on a Risk Based Approach: Corporations that can Issue Bearer Shares; Foreign Consulates and Embassies; Payday Lenders; White Label ABM Providers. See Appendix C for Q.30(e), 30(g), 30(i)
31	If restricted, provide details of the restriction	TD operates in accordance with jurisdictional requirements. As such, TD restricts the provision of services where there are legal or reputation concerns.
6. MONITORING & REPORTING		
32	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
33	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
33 a	If manual or combination selected, specify what type of transactions are monitored manually	TD deploys automated transaction monitoring solutions across all channels which is further supplemented with additional manual processes as appropriate.
34	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
34 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes
35	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
7. PAYMENT TRANSPARENCY		
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
37	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
37 a	FATF Recommendation 16	Yes
37 b	Local Regulations	Yes
37 b1	If Y, Specify the regulation	Proceeds of Crime (Money Laundering) and Terrorist Financing Act and associated regulations. In addition, TD operates in accordance with jurisdictional requirements. For example, in the U.S., TD complies with the USA PATRIOT Act.
37 c	If N, explain	Not Applicable
8. SANCTIONS		
38	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
39	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes

40	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
41	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
41 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transact
41 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transac
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transac
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transact
41 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transact
41 f	Other (specify)	See Appendix C.
42	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
9. TRAINING & EDUCATION		
43	Does the Entity provide mandatory training, which includes:	
43 a	Identification and reporting of transactions to government authorities	Yes
43 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
43 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
43 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
44	Is the above mandatory training provided to :	
44 a	Board and Senior Committee Management	Yes
44 b	1st Line of Defence	Yes
44 c	2nd Line of Defence	Yes
44 d	3rd Line of Defence	Yes
44 e	Third parties to which specific FCC activities have been outsourced	Yes
44 f	Non-employed workers (contractors/consultants)	Yes
10. AUDIT		
45	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
Signature Page		
Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2)		
The Toronto-Dominion Bank _____ (Financial Institution name)		
I, <u>Herbert Mazariegos, Chief AML Officer</u> (Senior Compliance Manager- Second Line representative), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.		
 Feb 27, 2024 (Signature & Date)		

Wolfsberg FCCQ - Appendix A

Branches of The Toronto-Dominion Bank

Source: List of Branches covered by TD Bank's Global Certification under the USA PATRIOT Act.

Location and name	Address	Banking Authority
Cayman Islands The Toronto-Dominion Bank	Butterfield House 68 Fort Street Georgetown, Grand Cayman Cayman Islands, B.W.I.	Cayman Islands Monetary Authority Office of the Superintendent of Financial Institutions
London The Toronto-Dominion Bank	60 Threadneedle Street London, England United Kingdom EC2R 8AP	Financial Conduct Authority Office of the Superintendent of Financial Institutions
Hong Kong The Toronto-Dominion Bank	Suite 2210, Two Pacific Place 88 Queensway, Hong Kong	Hong Kong Monetary Authority Office of the Superintendent of Financial Institutions
Singapore The Toronto-Dominion Bank	Millenia Tower 1 Temasek Avenue #15-02 Singapore 39192	Monetary Authority of Singapore Office of the Superintendent of Financial Institutions
New York Toronto Dominion Bank NY Branch	31 W 52nd St, New York, NY 10019-6101	Comptroller of the Currency - OCC

Wolfsberg's FCCQ – Appendix B

Subsidiaries of The Toronto-Dominion Bank¹

Subsidiary	Address of Head or Principle Address ²
Meloche Monnex Inc.	Montreal, Québec
Security National Insurance Company	Montreal, Québec
Primum Insurance Company	Toronto, Ontario
TD Direct Insurance Inc.	Toronto, Ontario
TD General Insurance Company	Toronto, Ontario
TD Home and Auto Insurance Company	Toronto, Ontario
TD Wealth Holdings Canada Limited	Toronto, Ontario
TD Asset Management Inc.	Toronto, Ontario
GMI Servicing Inc.	Winnipeg, Manitoba
TD Waterhouse Private Investment Counsel Inc.	Toronto, Ontario
TD Waterhouse Canada, Inc.	Toronto, Ontario
TD Auto Finance (Canada), Inc.	Toronto, Ontario
TD Group US Holdings LLC	Wilmington, Delaware
Toronto Dominion Holdings (U.S.A.) Inc.	New York, New York
Cowen Inc	New York, New York
Cowen Structured Holdings LLC	New York, New York
Cowen Structured Holdings Inc.	New York, New York
ATM Execution LLC	New York, New York
RCG LV Pearl, LLC	New York, New York
Cowen Financial Products LLC	New York, New York
Cowen Holdings, Inc.	New York, New York
Cowen and Company, LLC	New York, New York
Cowen CV Acquisition LLC	New York, New York
Cowen Execution Holdco LLC	New York, New York
Westminster Research Associates LLC	New York, New York
RCG Insurance Company	New York, New York
TD Prime Services LLC	New York, New York
TD Securities Automated Trading LLC	Chicago, Illinois
TD Securities (USA) LLC	New York, New York
Toronto Dominion (Texas) LLC	New York, New York
Toronto Dominion (New York) LLC	New York, New York
Toronto Dominion Capital (U.S.A.) Inc.	New York, New York
Toronto Dominion Investments, Inc.	New York, New York
TD Bank US Holding Company	Cherry Hill, New Jersey
Epoch Investment Partners, Inc.	New York, New York
TD Bank USA, National Association ³	Cherry Hill, New Jersey
TD Bank, National Association	Cherry Hill, New Jersey
TD Equipment Finance, Inc.	Cherry Hill, New Jersey
TD Private Client Wealth LLC	New York, New York
TD Wealth Management Services Inc.	Mt. Laurel, New Jersey
TD Investment Services Inc.	Toronto, Ontario
TD Life Insurance Company	Toronto, Ontario
TD Mortgage Corporation	Toronto, Ontario
TD Pacific Mortgage Corporation	Vancouver, British Columbia
The Canada Trust Company	Toronto, Ontario
TD Securities Inc.	Toronto, Ontario
TD Vermillion Holdings Limited	Toronto, Ontario
TD Financial International Ltd.	Hamilton, Bermuda
TD Reinsurance (Barbados) Inc.	St. James, Barbados
International	
Cowen Malta Holdings Limited	Birkirkara, Malta
Cowen Insurance Company Ltd	Birkirkara, Malta
Ramius Enterprise Luxembourg Holdco S.à.r.l	Luxembourg, Luxembourg
Cowen Reinsurance S.A.	Luxembourg, Luxembourg
TD Ireland Unlimited Company	Dublin, Ireland
TD Global Finance Unlimited Company	Dublin, Ireland
TD Securities (Japan) Co. Ltd.	Tokyo, Japan
Toronto Dominion Australia Limited	Sydney, Australia
TD Bank Europe Limited	London, England
Toronto Dominion International Pte. Ltd.	Singapore, Singapore
Cowen International Limited	London, England
Cowen Execution Services Limited	London, England
Cowen Asia Limited	Central, Hong Kong
Cowen and Company (Asia) Limited	Central, Hong Kong
Toronto Dominion (South East Asia) Limited Singapore	Singapore, Singapore

¹ Source: 2023 TD Bank Annual Report.

² Each subsidiary is incorporated or organized in the country in which its head or principal office is located.

³ Separate CBDDQ exits for TD Bank, National Association

Wolfsberg FCCQ – Appendix C

Additional Information for The Toronto-Dominion Bank

No.	Question	Additional information
13 a	If Y, provide further details	TD may use third parties to perform certain part of its AML,ATF, and Sanctions programme. In instances where third parties are used, formal sourcing agreements, adequate due diligence and controls must be in place. TD ensures that the third party's AML/ATF policies and practices are in line with the guidelines in the Enterprise AML/ATF policy and adhere to all relevant legal and regulatory obligations.
19 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	TD has robust policies and procedures in place to identify, assess, and monitor such clients prior to onboarding and on a continuous basis.
25 d	Other relevant parties	Examples include Directors, third parties, Power of Attorney (POA), guarantors, etc.
30 y	Other (specify)	<p>Comments on the following questions:</p> <p>30(i): Limited services (e.g., low amount FX exchange) are offered to non-account customers.</p> <p>30(e): TD does not knowingly permit relationships with Internet gambling businesses, only licensed/regulated brick and mortar are permitted.</p> <p>30(g): TD maintains a small number of relationships with legal cannabis businesses in Canada that meet industry-specific EDD standards.</p>
41 f	Other (specify)	<p>Singapore:</p> <ul style="list-style-type: none"> • Monetary Authority of Singapore (MAS) Alert list • Terrorism (Suppression of Financing) Act ("TSOFA") List <p>Hong Kong:</p> <p>Hong Kong Monetary Authority lists</p>