

C. COMMUNITY REINVESTMENT GOALS

Financial institution's annual Community Reinvestment Goals should include information on the number of small business loans, home mortgages, home improvement loans, and community development investments to be made within low and moderate- income neighborhoods within the City of Philadelphia.

1. Provide an overview of the financial institution's annual Community Reinvestment Goals and confirm most recent CRA rating.

TD Bank is dedicated to supporting the programs, organizations and people that contribute to the economic vitality, well-being and social equity of our communities. Making a positive impact on the communities where our customers and employees live and work, and inspiring others to join our efforts is a critical element of the TD Bank philosophy.

We believe that creating a socially responsible framework for our activities and working in concert with our neighborhoods, partners, and governmental officials, enhance our collective ability to make a difference. TD Bank reinvests in its local communities through its loan, investment, charitable giving, and employee volunteer programs.

TD Bank establishes annual goals for mortgage, home equity, small business and community development loans and investments in the City of Philadelphia. TD Bank considers a variety of factors in setting goals, including economic conditions, interest rate environment, availability and cost of housing and other market factors and conditions which may impact loan demand or credit quality. TD Bank also considers the opportunity for loan and investment referrals from community-based partners in the City of Philadelphia.

Overall CRA Rating

Institution's CRA Rating: This institution is rated Outstanding.

The major factors that support this rating include:

- The institution demonstrates a high level of qualified investments, community development (CD) loans, and CD services.
- The institution demonstrates occasional use of innovative or complex qualified investments and CD loans.
- The institution exhibits excellent responsiveness to credit and CD needs in its assessment area.

CRA Rating for the Philadelphia MMSA: Outstanding

The major factors that support this rating include:

- The institution demonstrates a high level of qualified investment activity, CD loans, and CD services in the Philadelphia MMSA.
- The institution demonstrates occasional use of innovative or complex qualified investments and CD loans in the Philadelphia MMSA.
- The institution exhibits excellent responsiveness to credit and CD needs in the Philadelphia MMSA.

2. Provide the number of small business loans, home mortgages, home improvement loans, and community development investments to be made within low and moderate-income neighborhoods within the City of Philadelphia.

Type	2022 Goals	2022 Results	2023 Goals
Small Business Loans	240	262	232
Home Mortgages	62	35	46
Home Improvement Loans	59	54	68
Community Development Investments	\$46,097	\$35,581	\$54,551

If applicable, explain why the previous year results did not meet the stated goal.

TD Bank does not set goals at the City or county level.

3. Provide the actual number and dollar amounts of residential mortgages, home improvement loans, community development investments, consumer loans, and small business loans, and other commercial loans made in neighborhoods within the City of Philadelphia.

Calendar Year 2022

Number of Loans by Income

Type	Low	Mod	Mid	Upper	Total
Residential Mortgage	7	28	30	132	197
Home Improvement	9	45	60	81	195
Small Business Loans	56	206	164	273	699
Community Development	6	-	-	2	8
Consumer Loans	NA	NA	NA	NA	NA
Other Commercial Loans	2	5	3	35	45
Total:	80	284	357	523	1144
How many business loans were originated?	NA	NA	NA	NA	NA

Value of Loans (\$) by Income

Type	Low	Mod	Mid	Upper	Total
Residential Mortgage	\$744	\$6,764	\$10,168	\$79,378	\$97,054
Home Improvement	\$859	\$3,753	\$7,685	\$15,009	\$27,306
Small Business Loans	\$1,726	\$3,310	\$3,038	\$6,206	\$14,280
Community Development	\$29,281	-	-	\$129,000	\$158,281
Consumer Loans	NA	NA	NA	NA	NA
Other Commercial Loans	\$2,250	\$31,779	\$4,825	\$179,285	\$218,139
Total:	\$34,860	\$45,606	\$25,716	\$408,878	\$515,060
% of Consumer Loans made through Credit Cards	NA	NA	NA	NA	NA

4. Provide information on other types of community development investments made in neighborhoods within the City of Philadelphia (for example: Grants, Education, Public or related Commercial Development).

Since 2002, the TD Charitable Foundation has contributed over \$295 million to non-profit institutions, fulfilling its mission to support, respect and improve the quality of life in the diverse communities we serve. The TD Charitable Foundation primarily funds programs aligned to one or more of the four drivers of our corporate citizenship platform, the TD Ready Commitment: Better Health, Connected Communities, Financial Security, and Vibrant Planet.

The US Community Giving amount for FY 2022 programs that primarily served Philadelphia is \$3.3 million. Organizations funded in Philadelphia include:

- ADAGP Charitable Foundation
- Affordable Housing Centers of America
- African American Chamber Of Commerce
- After School Activities Partnerships
- Al Día News Inc.
- Alex's Lemonade Stand Foundation
- AMANDLA, Inc
- Arden Theatre Company
- Attic Youth Center
- Boys & Girls Clubs of Philadelphia
- Bringing Hope Home, Inc.
- Broad Street Ministry
- Center City District
- Center City Proprietors Association
- Children First PA
- Coded by Kids
- Community First Fund
- Congreso de Latinos Unidos, Inc.
- Consumer Credit Counseling Service of Delaware Valley
- Cristo Rey Philadelphia High School
- Delaware River Waterfront Corporation
- DiverseForce
- Drexel University
- EducationWorks, Inc.
- Entrepreneur Works Fund
- Fairmount Park Conservancy
- Girl Scouts of Eastern Pennsylvania, Inc
- Greater Philadelphia Cultural Alliance
- Greater Philadelphia YMCA
- Green Philly Company
- Habitat for Humanity Philadelphia, Inc.
- Headstrong Foundation
- HIAS AND Council Migration Service of Philadelphia Inc
- Hispanic Association of Contractors and Enterprises, Inc.
- INDEPENDENCE BUSINESS ALLIANCE
- JDRF International
- Jewish Family and Children's Service of Greater Philadelphia
- Kimmel Center, Inc.
- Mann Center for the Performing Arts
- MANNNA- Metropolitan Area Neighborhood Nutrition Alliance
- March of Dimes
- Mazzoni Center
- Mom Your Business
- Mt. Airy USA
- National Association of Black Accountants, Inc. Philadelphia Chapter
- NATIONAL CONSTITUTION CENTER
- National Liberty Museum
- Old City Community Fund
- Operation Warm, Inc.
- Pennsylvania CDFI Network
- Pennsylvania Economy League, Inc
- Pennsylvania Horticultural Society
- People's Emergency Center
- Philabundance
- PHILADELPHIA ANIMAL WELFARE SOCIETY
- Philadelphia Association of Community Development Corporations
- Philadelphia Chinatown Development Corporation
- Philadelphia Commission for Women
- Philadelphia Gay Mens Chorus, Inc.
- Philadelphia Legal Assistance Center, Inc.
- Philadelphia Mural Arts Advocates
- Philadelphia Museum of Art
- PHILADELPHIA POLICE FOUNDATION
- Philadelphia VIP, Inc
- PIDC Community Capital
- Please Touch Museum
- Police Athletic League of Philadelphia
- Project HOME
- Starfinder Foundation
- Tech Impact
- The Chamber of Commerce for Greater Philadelphia Regional Foundation
- The Colored Girls Museum
- The Rock School for Dance Education
- The Urban League of Philadelphia
- Transplant House
- Turning Points for Children
- United Way of Greater Philadelphia and Southern New Jersey
- University City District
- Uplift Center for grieving Children
- Urban Affairs Coalition
- Valley Youth House Committee
- Veterans Multi-Service Center, Inc.
- Walnut Street Theatre Corp
- Welcoming Center for New Pennsylvanians
- Women's Opportunities Resource Center
- YouthBuild Philadelphia Charter School

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The 16th annual Housing for Everyone grant program, administered through the TD Charitable Foundation, awarded 33 grants, ranging from \$150,000-\$250,000, to organizations across TD's footprint in 2022. The focus of the Housing for Everyone program was to fund capacity building for organizations to address resident services for low- to moderate income individuals and families. In Philadelphia, the Jewish Family and Children's Service of Greater Philadelphia and Valley Youth House Committee were among the approved grantees.

TD Green Space Grants support green infrastructure development, tree planting, forestry stewardship, and community green space expansion as a way to advance environmental and economic benefits toward a low carbon economy. Through the program, municipalities are eligible to receive grants in support of local forestry projects in areas of great need within a community and centered around an annual theme. The 2022 theme for the program was "Supporting communities delivering environmentally equitable solutions." In Philadelphia, Esperanza Housing & Economic Development (\$20,000), Bartram's Garden Connell Park (\$20,000), and Riverfront North Partnership (\$18,000).

5. Briefly describe any lending outreach programs geared toward minorities, low-income individuals, women, or immigrants. This description should include the targeted community, the type of product (i.e. commercial, home lending, unsecured consumer) and any program outcomes.

Right Step Mortgage for LMI Borrowers:

This is a proprietary TD Bank product:

- Up to 97% Loan to Value (LTV) on single family and condo purchases
- 3% minimum borrower contributions for single family and condo purchases
 - o Minimum credit score: 660
 - o Lender Paid Private Mortgage Insurance (PMI)
 - o Income Eligibility: Borrower income must be < 80% of the HUD
- Area Median Income
 - o No income limits if subject property located in a census tract where the tract income is < 80% of the HUD Area Median Income

HomeReady Mortgage for LMI Borrowers

HomeReady offers expanded eligibility for financing homes in designated low-income areas:

Up to 97% LTV on single family and condo purchases

- Fixed interest rate for the entire term
- Provides long-term security and flexibility
- Customers can refinance at any time - no prepayment penalty
- Combined Loan to Value (CLTV) up to 105% with a Community

Second

- Lower MI requirement than standard FNMA loans > 90% LTV
- Minimum credit score as low as 620
- Not limited to first-time buyers
- Homebuyer/Homeowner education required

TD Home Access Mortgage

The TD Home Access Mortgage offers expanded eligibility for financing homes with a \$10,000 lender credit for purchase transactions, helping to support a broad range of borrower credit and income profiles:

- \$5,000 lender credit to all eligible borrowers for purchase transactions
- Fixed interest rate for the entire term
- Up to 97% LTV
- Combined LTV up to 105% with Bank approved Down Payment Assistance/Grant Program
- Minimum credit score as low as 620
- Homebuyer/Homeowner education required

DEPOSIT PRODUCTS

TD Essential Banking

TD Essential Banking is a low-cost, checkless account, ideal for customers who want an everyday bank account without overdraft fees or non-sufficient funds fees:

- \$0 minimum deposit to open the account
- No overdraft fees
- No ATM fee for using TD ATMs in the USA and Canada

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CONVERGENCE Philadelphia

CONVERGENCE Philadelphia is a collective impact initiative led by the Mortgage Bankers Association (MBA) to increase homeownership among Black, Hispanic, and other diverse households in the city. CONVERGENCE Philadelphia seeks to expand homeownership and the wealth-building opportunities that come with it. It engages the public, private, nonprofit, and philanthropic sectors. As of February 2023, TD Bank is one of three Cornerstone Partners for this work – in addition to Wells Fargo and Radian – and TD staff serve as co-leads for the Products and Programs workstream, which will facilitate homeownership gains among consumers through products and programs and create and/or enhance affordable lending programs and products to assist aspiring minority homeowners.

Philadelphia Business Lending Network

The Philadelphia Business Lending Network is an online service of the Department of Commerce in partnership with PBLN lenders to help local businesses thrive with innovative economic opportunities. This service enables business owners to express interest in financing to a group of nonprofit lenders, for profit lenders, and other funders with one form. TD was accepted as a participating organization in April 2023, which also makes select customers eligible to receive the city's Incentive Grant.

Bank On Philadelphia

The City of Philadelphia has partnered with [Bank On](#) to help residents get safe and affordable banking services. By using a Bank On-approved account, residents can avoid costly check-cashing services and unexpected fees. They can also get access to online banking and bill payments. In addition to offering a CFE Certified Bank On Product – TD Essential Banking – TD staff participate in regular meetings of the Bank On Philadelphia Coalition to further the Office of Community Empowerment and Opportunity's work on financial inclusion.

6. **Disparities in Lending: Attach a long-term strategic plan to address disparities in the Bank's or Financial Institution's lending and investment activities that may be indicated in the [City's 2021 annual lending study](#).**

Label this document “Appendix II – Long-Term Strategic Plan.” If disparities are not indicated in the study, then a strategic plan on programs, lending, and branching patterns should be submitted. Label this document “Appendix II – Long-Term Strategic Plan”.

All depositories are required to respond per Chapter 19-200 as referenced:

“Each depository shall also provide the City with a long-term strategic plan to address disparities in its lending and investment activities. The strategic plan shall address how the depository will match or exceed peer lending performance in targeting capital access and credit needs disclosed in disparity studies commissioned by the City.”

**APPENDIX II
LONG-TERM STRATEGIC PLAN**



Policy Name | Fair & Responsible Banking Policy (the "Policy")

Line of Business | TD Bank, America's Most Convenient Bank®
TD Bank, N.A. & TD Bank USA, N.A. (the "Bank")

Corporate Area | Compliance

Effective Date | September 13, 2022

1. Purpose

The Bank has adopted this Fair & Responsible Banking Policy to:

- support its commitment to treating all individuals fairly and equitably in offering and providing banking products and services;
- mitigate Risk to the Consumer;
- prevent discriminatory practices;
- prevent unfair, deceptive, or abusive acts or practices; and
- maintain compliance with applicable federal and state laws and regulations concerning Unfair, Deceptive, or Abusive Acts or Practices (“UDAAP”) and fair lending.

The Bank and its Board of Directors are committed to Fair Banking practices and principles.

- We treat all prospective and existing customers fairly without regard to race, ethnicity, color, religion, creed, national origin, nationality, ancestry, sex, pregnancy, parenthood, childbirth or related medical conditions, the non-use of the surname of a spouse, sexual orientation, gender identity or expression, political affiliation, age (provided that an applicant has the capacity to enter into a binding contract), marital status, familial status or responsibilities, civil union status or domestic partnership status, disability (sensory, physical, or mental), learning disability, actual or perceived personal appearance, genetic information, HIV status, military status (including dishonorable discharge), matriculation, order of protection status, victims of domestic violence, receipt of public assistance, the good faith exercise of any rights under the Consumer Credit Protection Act, or any other basis protected by federal or state law ("prohibited factors"¹).
- We are committed to providing financial products and services to all customers and in all communities with transparency and clear and concise information. Our intent is to be informative and forthright about our products and services and meet the federal and state laws and regulations governing UDAAP and fair lending.
- We will maintain a Fair Banking compliance management system (CMS) suitable to the size and risk profile of the Bank to effectively implement this Policy throughout the Bank's businesses and operations.

¹ See Appendix A for list of "prohibited factors" by source (i.e., ECOA, FHAct, and/or TD Bank Policy).
Fair & Responsible Banking Policy

2. Scope/ Application

This Policy applies to all employees of the Bank and third-party service providers operating on behalf of the Bank who deliver any financial services to TD customers regarding consumer and applicable commercial and small business products and services. Further, this Policy applies to the full life cycle of the lending process, including product design, development, marketing, customer onboarding, product origination, transition processing, product maintenance, loss mitigation & recovery, product termination and customer exit.

The scope of “fair banking” extends beyond lending and includes all consumer financial products or services across the product lifecycle and includes fair lending laws, “risk to the consumer” and UDAP/UDAAP risk. The Bank is committed to mitigating and preventing any “risk to the consumer,” which may arise from an unfair, deceptive, or abusive business act or practice.

The scope of “fair lending” is narrower than the concept of “fair banking.” The Bank is committed to responsible banking practices including providing credit (hereinafter referred to as “lending” or “loans”) in a fair and non-discriminatory manner that meets standards set forth under applicable federal and state laws and regulations. The Bank has established credit policies that set loan parameters within the Bank's credit risk appetite for its consumer, applicable small business, and applicable commercial lending products and services.

3. Policy Details/Requirements

Equal Credit Opportunity Act, Implemented by Regulation B

The Equal Credit Opportunity Act ("ECOA") implemented by Regulation B, requires that we make credit available equally to all qualified borrowers. It applies to all types of credit, including business purpose loans. Business Lines must follow ECOA requirements, such as providing required disclosures and timely notification of credit decisions. ECOA prohibits discrimination based on race, color, religion, national origin, sex, marital status, age (provided that the applicant has the capacity to enter into a binding contract), or the fact that the applicant has in good faith exercised any right under the Consumer Credit Protection Act or any state law for which an exemption has been granted (“protected classes”). We are prohibited from basing any aspect of a credit transaction (products, prices, decisions, or service) on a prohibited basis.

Fair Housing Act

The Fair Housing Act (FHA) prohibits discrimination on the basis of race, color, religion, sex, handicap, familial status, or national origin in any aspect of a housing transaction, including the sale, rental, and financing of housing. FHA protections extend to loan applicants, any person associated with the loan applicant, and any owners, lessees, tenants, or occupants of the dwelling. Business Lines must follow FHA requirements such as offering consistent and standard terms or conditions on a loan, including interest rates, points, or fees for similarly situated customers.

The FHAct is applicable to Consumer/Residential Real Estate Secured Lending and Commercial and Small Business Lending because it regulates business purpose loans for the construction or acquisition of dwellings. Any lender who provides loans for housing is subject to the FHAct. The FHAct impacts Marketing and Retail Operations related to Consumer/Residential Real Estate Secured Lending because its accompanying regulation also requires lenders to place an FHAct poster in all of our store lobbies and because best practices also require national bank lenders to use the FHAct logo in advertisements for housing credit.

Fair Lending - Types of Unlawful Discrimination

- **Overt disparate treatment** – Discrimination through explicit consideration of prohibited factors; for example, specifically excluding individuals with a handicap;
- **Comparative disparate treatment** – Shown by evidence that there are differences in treatment on a prohibited basis that are not fully explained by legitimate non-discriminatory factors. For example, showing that significantly more Policy exceptions are granted to white borrowers than to non-white borrowers; and
- **Disparate impact** – occurs when a lender applies a facially neutral Policy or practice equally to all applicants or borrowers, but the Policy or practice disproportionately excludes or burdens certain persons on a prohibited basis. The fact that a Policy or practice creates a disparity on a prohibited basis is not by itself proof of a violation. Rather, if the Policy or practice is justified by a business necessity and an alternative Policy or practice that could serve the same purpose with less discriminatory effect does not exist, the Policy or practice may not be considered discriminatory under Fair Lending laws.

Unfair or Deceptive Acts or Practices (UDAP)

Unfair, Deceptive, or Abusive Acts or Practices (UDAAP)

Under the Dodd-Frank Act, it is unlawful for any provider of consumer financial products or services, including third party service providers, to engage in unfair, deceptive, or abusive acts or practices. State UDAP and the Federal Trade Commission (FTC) UDAP laws also prohibit unfair or deceptive acts or practices with regard to all products and services offered by the Bank, and to every stage and activity, from product development to the creation and rollout of marketing campaigns, and to servicing and collections. (For purposes of this Policy, "UDAAP" includes state and FTC provisions on UDAP.)

An act or practice is "unfair"² if:

- It causes or is likely to cause substantial injury to consumers;
- The injury is not reasonably avoidable by consumers; and
- The injury is not outweighed by countervailing benefits to consumers or to competition.

A representation, omission, act, or practice is considered "deceptive" when:

- The representation, omission, act, or practice misleads or is likely to mislead the consumer;
- The consumer's interpretation of the representation, omission, act, or practice is reasonable under the circumstances, and;
- The misleading representation, omission, act, or practice is material.

The Dodd-Frank Act makes it unlawful for any covered person or third-party service provider to engage in an abusive act or practice. An act or practice is "abusive" when it:

- Materially interferes with the ability of a consumer to understand a term or condition of a consumer financial product or service; or
- It takes unreasonable advantage of:
 - A lack of understanding by the consumer of a material risk, costs, or conditions of a product or service;
 - The inability of the consumer to protect their interests in selecting or using a consumer financial product or service; or
 - The reasonable reliance of the consumer on a covered person (Bank employee or Third-Party Service Provider) to act in the consumer's interest.

Applicable Business Lines (as listed in section 9) will comply with Fair and Responsible Banking laws, regulations and principles set forth in this Policy. The key areas of Fair and Responsible Banking focus include³:

- The CFPB has expressed its view that discrimination in products and services not covered by ECOA and FHA are considered unfair practices and will be included in examinations based on that interpretation.
- Failure to comply with the technical compliance provisions of applicable law.
- **Accepting Applications** – The Bank must not engage in acts or practices that discourage applicants from making or pursuing an application for TD credit products and services.
- **Disclosures, Commitments and Terms and Conditions** - The Bank must provide clear disclosures, commitments and Terms and Conditions. All such documents must also be on fair terms in accordance with applicable laws, including fair banking laws and regulations.
- **Limited English Proficiency (LEP)** - The Business Lines will take reasonable steps to communicate with persons having LEP. The Bank strives to provide fair access and equal opportunities to obtain financial products and services. TD's account agreements, product and service documentation are negotiated and provided in English for Business Lines that cannot offer end-to-end servicing in alternate languages. The Business Lines must obtain guidance from Compliance and Legal prior to providing customer communications in alternative languages.
- **Loan Decisioning Process** – Standard automated and manual underwriting decisions and underwriting exceptions are monitored for overt discrimination, disparate treatment, and disparate impact. The Bank must provide accurate notices of action taken on loan applications in accordance with the provisions of ECOA/Reg B.

³ Fair and Responsible Banking principles apply to all activities of the Bank and are not limited to the key areas of focus listed herein.

- **Loan Pricing Process** – Pricing exceptions and discretionary pricing are monitored for disparate treatment and disparate impact. Business Lines must implement policies/procedures to monitor pricing exceptions.
- **Loan Servicing, Collections, and Recovery** – The Bank, through its policies, procedures, and processes, must provide equal treatment of all borrowers in the areas of credit reporting, collection, insurance, re-appraisal of collateral, loss mitigation, repossession, and foreclosure. Materials must be clear, conspicuous, and easily understood by the customer. Borrowers must be given the same beneficial presumptions and equal measures of assistance and diligence without regard to any status protected by applicable federal law or regulations.
- **Marketing and Advertising** – The Bank must not engage in marketing or advertising practices that are unfair, deceptive, or abusive to the consumer. The Bank must not engage in marketing or advertising practices that violate fair lending laws and provide unequal access to products or services on any prohibited basis through the use of technology including algorithms or inputs into marketing models. The Bank must not engage in marketing or advertising practices that would discourage, on any prohibited basis, the making or pursuing of an application for credit or other banking services. The Bank must comply with the requirements of applicable laws relating to the non-discriminatory marketing or advertising of products and services. Additionally, the Bank must not engage in steering customers on a prohibited basis.
- **Model Usage** – Models used by the Bank that impact customer access to financial services must not utilize data variables that identify prohibited factors as defined in this Policy or proxies for these prohibited factors. Models are monitored to understand potential disparate impact on a prohibited basis.
- **Operations** – The Bank must not communicate to the consumer any verbal or written statements that are unfair, deceptive, or abusive. Scripts and procedures are reviewed for Fair Banking concerns.
- **Product and Services** – The Bank must not develop or present products or services that are unfair, deceptive, or abusive to the consumer. Furthermore, the Bank must not engage in misleading or unethical sales practices.
- **Redlining and Reverse Redlining** – The Bank must not engage in redlining or reverse redlining activities. The Bank must implement a Redlining Risk Analysis Methodology that describes the Bank's redlining risk management process, purpose, responsibilities, scope, frequency, and reporting requirements for monitoring risks of both redlining and reverse redlining activity. The Methodology must define peer benchmark methodology and will prescribe thresholds for additional analysis, escalation, and corrective action.
- **Third Party Service Providers** – The Bank, through its Third Party Risk Management and Vendor Management programs, provides oversight of third party service providers who deliver financial services on behalf of the Bank to monitor and maintain compliance with consumer protection laws, fair lending laws and this Policy. The Business Line engaging and overseeing the third party is responsible for compliance with this Policy.

4. Monitoring and Control

Oversight Functions

Fair Banking Compliance ("FBC"), under the direction of the Compliance Director, Fair Banking & Compliance Analytics, will be responsible for providing effective Compliance oversight, providing guidance on regulatory matters, and independently assessing the adequacy of, adherence to, and effectiveness of Business Line Fair Banking controls and practices. The Compliance Regulatory Change Office, with input from FBC, is responsible for monitoring and communicating changes in banking industry laws and regulations related to UDAAP, fair lending and Risk to the Consumer. Legal advice and legal interpretations will be obtained from the Legal Department, where appropriate in a manner that preserves attorney-client privilege.

FBC conducts Fair Banking risk assessments to identify potential fair lending and UDAAP risk. The results of the risk assessments are provided to the Business Line, reported to the appropriate governance forum per the risk assessment methodology and procedure and are used for planning monitoring activities. FBC conducts risk-based monitoring and analysis to assess adequacy of Fair Banking controls and to identify and measure Fair Banking risk across the Bank. FBC and control partners engage with the Business Line to take corrective action if concerns are identified.

Management and Board Reporting

Compliance governance standards have been established regarding Management and Board reporting to communicate sufficient, relevant, and timely information regarding compliance risk management effectiveness to Senior Management and the Audit Committee of the Board, to enable them to discharge their duties. The purpose of the reporting is to inform, promote transparency, facilitate dialog, and escalate appropriate information to facilitate Management attention to any corrective or remedial measures or to address any issues, as may be warranted.

Fair Banking Training

Business Line Senior Management is required to ensure there is adequate training in place to educate leadership and staff on fair banking requirements. This includes completing required enterprise wide-Fair Banking training and monitoring for completion rates.

The Fair and Responsible Banking ("FRB") Annual Training Plan Guidance encourages all business lines to develop and document additional fair banking training efforts on an annual basis.

The fair banking training developed by the Business Lines must consider the roles and responsibilities for each employee, assess the employee's current knowledge and skills, determine where any gaps exist, and identify external or internal training resources to address the identified gaps. FBC and Business Line Senior Management may develop training content to address skill and knowledge gaps.

5. Exception Management

Exceptions from the requirements of this Policy require the approval of the U.S Chief Compliance Officer. If the exception request is approved, actions taken in accordance with the approved exceptions are deemed in compliance with this Policy. The granting of an exception does not mean there is a deficiency in policy compliance.

While certain Policy exceptions may be permitted, exceptions from the prohibitions against engaging in unlawful discriminatory lending and unfair, deceptive, or abusive acts or practices are not permitted.

Employees may report concerns relating to fair and responsible banking without fear of retaliation, either Online through the Bank's [Conduct and Ethics Hotline](#) or by calling 1-866-293-2365. For more information, please visit the [Conduct & Ethics Resource Site](#).

6. Ownership and Review

Policy Owner: U.S. Chief Compliance Officer

Policy Approval: Audit Committee of the Board of TD Bank US Holding Company

Committee Review/Endorsement: N/A

Policy Contacts:

Head of U.S. Compliance - Fair and Responsible Banking, CRA Program and Compliance Regulatory Change Office

Compliance Director - Fair Banking and Compliance Analytics

7. Roles and Responsibilities

Role	Responsibility
TDBUSH Audit Committee of the Board of Directors (ACOB)	<ul style="list-style-type: none">• Annual review and approval of this Policy and all substantive revisions to it• Oversees progress in remediating material deficiencies that are reported to the Committee
Enterprise Risk Management Committee (ERMC)	<ul style="list-style-type: none">• Provides oversight by reviewing this Policy• Maintains a general understanding of the scope of this Policy and where required, makes inquiries to Senior Management with respect to the Policy• Oversees progress by Management in remediating material deficiencies that are reported to the Committee

<p>Fair Lending Oversight Committees (FLOCs)</p>	<ul style="list-style-type: none"> • Provide governance, guidance, reporting and oversight to the respective Business Lines by promoting an integrated and effective fair lending and compliance management system and culture within the Bank • Addresses important fair lending concerns that could negatively impact the consumer • A FLOC is established for each of the key lending segments of the Bank: Residential Lending, TD Auto Finance, Credit Card and Unsecured Lending, and Commercial Banking-Small Business. • Membership includes key Business Line personnel, , key Fair Banking Compliance personnel, and Legal representatives • Responsibilities are further defined in the Fair and Responsible Banking Framework and the FLOC Mandates
<p>U.S. Chief Compliance Officer</p>	<ul style="list-style-type: none"> • Policy owner • Annual review and approval of the Policy • Presents the Policy to the Audit Committee • Provides reporting to the Enterprise Risk Management Committee and Audit Committee of the Board • Approves exceptions to the Policy (NOTE: Exceptions to the prohibition against engaging in unlawful discriminatory lending and unfair, deceptive, or abusive acts or practices are not permitted.)
<p>Head of U.S. Compliance - Fair and Responsible Banking, CRA Program and Compliance Regulatory Change Office</p>	<ul style="list-style-type: none"> • Responsible for the development, maintenance, monitoring and reporting with respect to this Policy, and for providing second line risk management and oversight of business lines' implementation of this Policy • Apprises executive management of fair and responsible banking risk and risk management activities
<p>Compliance Director - Fair Banking and Compliance Analytics</p>	<ul style="list-style-type: none"> • Addresses questions regarding the implementation of this Policy or issues of potential non-compliance • Authors and updates the Policy • Answers questions and addresses feedback relative to the Policy • Provides Policy updates to the corporate database • Oversees the Fair Banking Compliance program

Business Line Senior Management	<ul style="list-style-type: none"> • First line of defense business segments are accountable for designing, implementing, and maintaining appropriate processes and controls to achieve and maintain compliance with this Policy, and for assessing the design and effectiveness of those processes and controls. In this regard and with the support of Compliance as requested, the business segment shall: <ul style="list-style-type: none"> ○ Establish and implement policies and procedures incorporating the details/requirements set forth in this Policy; ○ Establish and implement policies and procedures incorporating the Monitoring and Control requirements set forth in this Policy; and ○ Maintain adequate knowledge and understanding of requirements set forth in this Policy, achieved through various methods such as the development of appropriate training, completion of any assigned standard Compliance training issued through TD Bank's Learning Management System or contacting Compliance for assistance when needed.
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8. Policy Review Cycle

Dates/Timing	Details
Approval Date	September 13, 2022
Effective Date	September 13, 2022
Review Frequency	Annually or more frequently if warranted by significant legal or regulatory developments
Next Review Date	September 13, 2023

9. Legal and Regulatory References and Applicability

- Fair Housing Act (FHAct), 42 U.S.C. 3601, 24 CFR 81
- Equal Credit Opportunity Act (ECOA), 15 U.S.C. 1691, 12 CFR 1002 (Regulation B)
- Unfair or Deceptive Acts or Practices (UDAP), 15 USC 45 (section 5 of the FTC)
- Unfair, Deceptive or Abusive Acts or Practices (UDAAP), 12 USC 5531(c) and (d)

Business Lines and Applicable Regulation Summary Table

	FHAct	ECOA	UDAP UDAAP
Commercial Loan Workout	X	X	X
Consumer Deposit Products		X	X
Home Equity (Lines of Credit and Loans)	X	X	X
Marketing	X	X	X
Regional Commercial Bank/ Small Business- Lending	X	X	X
Regional Commercial Bank/ Small Business- Deposits		X	X
Residential Mortgage	X	X	X
Retail Card Services		X	X
Retail Credit Loan Operations and Servicing	X	X	X
Strategic Card- Nordstrom		X	X
Strategic Card- Target		X	X
TD Auto Finance		X	X
Unsecured Lending (TD Fit)		X	X
US Customer Assistance	X	X	X
US Bankcard		X	X

10. Appendix A – List of Prohibited Factors by Source

ECOA

- Race
- Color
- Religion
- National origin
- Sex (Gender)
- Marital status

- Age
- Receipt of Public Assistance
- Good faith exercised right under the Consumer Credit Protection Act

FHAct

- Race
- Color
- Religion
- Sex
- National Origin
- Familial Status
- Disability

TD Fair and Responsible Banking Policy and other laws including Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, and various state sources

- All ECOA and FHAct factors
- Ethnicity
- Creed
- Nationality
- Ancestry
- Pregnancy
- Parenthood
- Childbirth or Related Medical Conditions
- Non-use of spouse's surname
- Sexual orientation
- Gender identity or expression
- Political affiliation
- Civil Union or domestic partnership status
- Disability (sensory, physical, or mental)
- Learning disability
- Actual or perceived appearance
- Genetic information
- HIV Status
- Military status (including dishonorable discharge)
- Matriculation (Status as an enrolled student)
- Order of protection status
- Victims of domestic violence

TD Bank, America's Most Convenient Bank

Philadelphia Outreach Action Plan

Background

TD Bank, America's Most Convenient Bank®, ("TD") received feedback regarding its engagement in the underserved communities in the City of Philadelphia during listening sessions sponsored by the National Community Reinvestment Coalition (NCRC) and the Federal Reserve/Office of the Comptroller Currency (OCC) Public Hearings related to the bank's acquisition of First Horizon Bank. In response, TD Bank's Philadelphia leadership team conducted multiple follow-up meetings with NCRC and its local members to develop an action plan for addressing concerns regarding TD's mortgage origination, small business lending, store network in low-to-moderate (LMI) communities, and overall community engagement with BIPOC communities in Philadelphia. The following Action Plan has been developed in response to community feedback, with the goal of creating meaningful relationships with community groups in Philadelphia.

Community and BIPOC Outreach

TD will increase its community outreach and engagement, particularly in LMI and minority communities within Philadelphia, by:

- Working with community groups to identify community and non-profit boards of directors that do not have, and would value, TD representation for board opportunities.
- Promoting TD's affordable banking products and financial education resources available to community members
- Engaging with and providing outreach to specific BIPOC Communities and holding listening sessions with community organizations such as:
 - Black Community
 - LatinX Community
 - AAPI Community
 - LGBTQ+ Community
- Increasing CRA-focused charitable contributions and including sponsorships

Financial Education

TD will advance a financial education strategy, that will include but not be limited to:

- Conducting classes to increase financial education with a goal to improve mortgage eligibility.
- Seeking to partner with community groups to expand access to financial services and education.
 - Partnering with local community organizations to help facilitate financial intelligence courses ranging from youth education (K-12), credit building, credit repair, credit management, affordable housing, fraud prevention, and small business management workshops.

- Seeking to increase community engagement in financial education.
 - Partnering with community groups to expand access to financial services and education.
 - Seeking feedback about financial education materials from community groups on how to make the language more accessible.
- Offering additional resources, including subject matter experts, to help address the gaps for affordable housing in the city of Philadelphia

Affordable Housing

TD will employ various strategies to promote access to affordable housing, including but not limited to:

- Partner with MLOs and CMLOs.
- Increasing store engagement to enhance LMI and minority mortgage origination.
- Focusing on direct-to-consumer marketing, digital marketing, and LMI and minority-focused realtor events.
- Seeking to expand commercial lending to increase affordable housing inventory in Philadelphia.
- Continuing to pursue investment and lending opportunities to develop for-rent housing, deploying LIHTC investments and originating construction loans.

Store Network

TD will expand its network of stores in Philadelphia, including but not limited to:

- Opening three to five new stores in Philadelphia in LMI and/or Majority-Minority areas, with a goal to open these stores within the next five years.
 - Northern Liberties (4th and Spring Garden) - Opening January 2024
 - Hunting Park Plaza - Opening May 2024
- Developing the "Community Centered Store" format for certain Stores, which is a TD Bank location designed to empower people, provide information about resources and financial health, and grow with the community in real time. In addition to supporting customer's day-to-day banking needs, Community Centered Stores will:
 - Provide financial education resources.
 - Grow local business & encourage entrepreneurship.
 - Stand tall with key community organizations.
 - Provide coaching, mentoring and volunteerism.
- Consulting with NCRC members for input on locations identified by TD to serve targeted communities.
- Seeking to continue to hire a diverse team of employees to staff stores in LMI and minority areas to reflect the demographics of the locations.

Diversely Owned Small Business Support

TD will support small businesses in LMI and minority communities in Philadelphia by:

- Identifying and supporting select Community Development Financial Institutions (CDFI) that are focused on Philadelphia, to help support the Small Business ecosystem in LMI and minority communities through lending, investments, grants, and referral partnerships.

Reporting and Feedback

TD will initiate the following mechanisms for reporting on activities and receiving feedback:

- Establishing a Philadelphia Community Advisory Council (PCAC), inviting representatives from local community groups – as a forum to discuss updates on community outreach and lending initiatives.
 - Representatives of TD Bank's senior Philadelphia executives for retail and commercial banking will attend each meeting with the Regional Market President attending at least twice a year.
- Updating PCAC members on progress and feedback related to outreach initiatives on a quarterly basis for the initial 24-months (January 2023 to December 2024).

All items outlined within TD Bank's Philadelphia Outreach Plan are subject to change and modifications due to impact from changes in economic conditions, regulatory requirements, and/or unanticipated events, including but not limited to changing community needs, revised regulatory expectations, and changing economic conditions. Changes and modifications will be discussed in advance with input from the PCAC.