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. Do not submit* metropolitan statistical *area (MSA) data that includes areas outside of 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

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	2024 Results	2025 Results	2026 Goals
Small Business Loans	381	330	246
Home Mortgages	45	44	38
Home Improvement Loans	54	47	100
Community Development Investments	67,668	71,529	106,953
Other (Please define if include)			

If applicable, please provide context for a decline in actual results from 2024 to 2025 and/or a decline from 2025 results to 2026 goals.

Any decline in CRA lending results due not indicate a reduced commitment to communities but rather reflect external economic conditions and borrower behavior. Community development investments goals are based on a three-year target due to there nature and complexity. Currently TD Bank is on pace to exceed our three-year commitment target. CRA mortgage and small business loans are a percentage of total production in these categories,

3. **Provide the total number (count) and dollar amounts of residential mortgages, home improvement loans, small business loans and community development investments made in the City of Philadelphia.**

Calendar Year 2025

Number of Loans by Income

Type	Low	Mod	Mid	Upper	Total
Residential Mortgage	12	32	24	56	124
Home Improvement	6	20	20	36	82
Small Business Loans	55	196	180	259	690
Community Development					31
Other (please define if include)					0
Total:	73	248	224	351	927

Value of Loans ($) by Income

Type	Low	Mod	Mid	Upper	Total
Residential Mortgage	$ 2,465	$ 6,060	$ 6,613	$ 43,711	$ 58,849
Home Improvement	$ 3,074	$ 1,550	$ 1,742	$ 6,279	$ 12,645
Small Business Loans	$ 1,398	$ 5,046	$ 4,106	$ 15,924	$ 26,474
Community Development					$ 294,969
Other (please define if include)					$ 0
Total:	$ 6,937	$ 12,656	$ 12,461	$ 65,914	$ 392,937

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).**

See attached Appendix: FY25 US Social Impact Facts Philadelphia

5. **Briefly describe any lending outreach programs geared toward low and moderate-income neighborhoods in the City of Philadelphia. This description should include the targeted community, the type of product (i.e. commercial, home lending, unsecured consumer) and any program outcomes.**

HOME LENDING 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

6. **Briefly describe any innovative ways your institution provides outreach or delivers banking services outside of traditional branch locations.**

TD has two community stores in Philadelphia, which are located at 3735 Walnut Street and 700 E Hunting Park Ave. TD's community stores are located in underserved neighborhoods, where access to physical bank locations are scarce. These stores offer dedicated spaces for free community events, financial education, and co-hosted events with local organizations

7. **<u>Disparities in Lending:</u> Attach a long-term strategic plan to address disparities in the Bank's or Financial Institution's lending and investment activities. Please include reference to any products or services offered to address such disparities that may be indicated in the City's most recent 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 <u>long-term strategic plan</u> 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	| May 21, 2024

1. Purpose

The Bank 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;
- 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 ("UDA(A)P")[1] 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, citizenship, immigration status, 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"[2]).
- 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

[1] Throughout this Policy, Unfair, Deceptive, or Abusive Acts or Practices (UDAAP) and Unfair, or Deceptive Acts or Practices (UDAP) are referred to collectively as "UDA(A)P."

[2] See Appendix A for list of "prohibited factors" by source (i.e., ECOA, FHAct, and/or TD Bank Policy).

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laws and regulations governing UDA(A)P and fair lending.

- We are committed to providing access to all our products and services to corporate entities, businesses, nonprofits, or individuals in compliance with federal and state laws.
- We will maintain a Fair Banking Compliance ("FBC") management system suitable to the size and risk profile of the Bank to effectively implement this Policy throughout the Bank's businesses and operations.

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 and/or support consumer and applicable commercial and small business products and services. Further, this Policy applies to the full life cycle of the banking process, including business strategy, 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, and UDA(A)P risk.

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 comply with ECOA requirements, such as providing required disclosures and timely notification of credit decisions. ECOA prohibits discrimination based on race, color, religion, national origin, sex (including gender identity and sexual orientation- also covers discrimination based on actual or perceived nonconformity with traditional sex- or gender-based stereotypes, and discrimination based on an applicant's social or other associations), marital status, age (provided that the applicant has the capacity to enter into a binding contract), the fact that all or part of the applicant's income derives from any public assistance program, 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 (FHAct) prohibits discrimination on the basis of race, color, religion, sex (including gender identity and sexual orientation), disability, familial status, or national origin in any aspect of a housing transaction, including the sale, rental, and financing of housing and the appraising of residential real property. FHAct 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 FHAct 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 is also applicable to 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[3] 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, "UDA(A)P" includes state, Office of the Comptroller of the Currency ("OCC"), and FTC provisions on UDAP.)

[3] The Office of the Comptroller of the Currency (OCC) and Federal Reserve Board may also enforce UDAP.

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An act or practice is "unfair" 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.

The key areas of Fair and Responsible Banking focus include[4]:

- **Compliance –** The bank must comply with the technical compliance provisions of applicable laws governing fair banking.

- **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.

- **Appraisals –** The Bank must not appraise real property using or relying on conclusions based on prohibited factors of the applicant or community.

- **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 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

[4] Fair and Responsible Banking principals apply to all activities of the Bank and are not limited to the key areas of focus listed herein.

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guidance from FBC, 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 potential 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/Regulation B.

- **Loan Pricing Process** – Pricing, pricing exceptions and discretionary pricing are monitored for potential overt disparate treatment, comparative 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. The Bank must not deny financial services to corporate entities, businesses, nonprofits, or individuals on a subjective basis where the applicant meets current bank standards.

- **Redlining and Reverse Redlining** – The Bank must not engage in redlining or reverse redlining activities. The Bank is required to establish a Redlining Risk Analysis Methodology that

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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.

- **Special Purpose Credit Programs**[5] [6] – To meet special credit needs of minority and traditionally underserved communities, Business Lines may establish and administer Special Purpose Credit Programs (SPCPs) to extend credit to individuals who, under the Bank's customary standards of creditworthiness, may not receive such credit or would receive it on less favorable terms than are ordinarily available to other applicants applying to the organization for a similar type and amount of credit. Such programs must comply with the provisions of the Equal Credit Opportunity Act and Regulation B and be reviewed and approved by Fair Banking Compliance and Legal prior to implementation. Any Business Line considering establishing a SPCP must consult with TD Legal . Any SPCP initiative will be prepared at the direction of Legal .

- **Third-Party Service Providers** – The Bank, through its Third-Party Risk Management and Vendor Management programs, provides requirements and 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 and receiving compliance attestations from vendors. Procedures encourage escalation of complex and/or high risk Fair Banking issues to the Fair Banking Compliance Unit. Current Third- Party Risk Management program procedures include the following aspects:
  - Customer facing service providers are assigned an elevated inherent risk level to reflect regulatory risks.
  - Vendor Management Control Assessment and Master Service Agreement (MSA) require fair lending and UDAAP training for customer facing service providers.

4. Monitoring and Control

Oversight Functions

Fair Banking Compliance 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 UDA(A)P and fair lending. Legal advice and legal interpretations will be obtained from the Legal Department, and where appropriate in a manner that preserves attorney-client privilege.

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[5] https://files.consumerfinance.gov/f/documents/cfpb_advisory-opinion_special-purpose-credit-program_2020-12.pdf

[6] https://www.hud.gov/sites/dfiles/FHEO/documents/FHEO_Statement_on_Fair_Housing_and_Special_Purpose_Programs_FINAL.pdf

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FBC conducts Fair Banking risk assessments to identify potential fair lending and UDA(A)P 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 dialogue, 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 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.

Quality Control Testing

Business Line Senior Management is required to confirm that there is adequate testing in place to identify potential fair lending and/ or UDA(A)P risks. Test results provide first line management with information that enables them to assess if fair banking risks are mitigated effectively and to continue to operate within their established risk appetite. The test results provide FBC with direct information upon which to evaluate the effectiveness of the first line's regulatory controls.

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 Annual Review

Policy Owner: U.S. Chief Compliance Officer ("U.S. CCO")

Policy Approval: Audit Committee of the Board of TD Bank US Holding Company ("ACoB") reviews and approves at the discretion of the U.S. CCO. If unchanged or revisions are not material, ACoB delegates authority to the U.S. CCO to approve the Policy. In such case, the U.S. CCO will provide notice to the ACoB with a copy of the revised Policy.

Committee Review/Endorsement: U.S. Enterprise Risk Management Committee ("ERMC") reviews and approves at the discretion of the U.S. CCO. If unchanged or revisions are not material, ERMC delegates authority to the U.S. CCO to approve the Policy. In such case, the U.S. CCO will provide notice to the ERMC with a copy of the revised Policy.

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)	• Reviews this Policy for approval when there are material or significant changes. If unchanged or revisions are not material, ACoB delegates authority to the U.S. CCO to approve the Policy. In such case, the U.S. CCO will provide notice to the ACoB with a copy of the revised Policy • Oversees progress in remediating material deficiencies that are reported to the Committee
U.S. Enterprise Risk Management Committee (ERMC)	• Reviews this Policy for approval when there are material or significant changes. If unchanged or revisions are not material, ERMC delegates authority to the U.S. CCO to approve the Policy. In such case, the U.S. CCO will provide notice to the ERMC with a copy of the revised 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 in remediating material deficiencies that are reported to the Committee
U.S. Compliance Risk Management Committee (CRMC)	• Review of the Fair Banking Programs including governance, strategies, business segment targets, risk assessments, controls, complaints, and examinations • Oversees progress in remediating material deficiencies that are reported to the Committee
Fair Lending Management Subcommittee (FLMC)	• Formal subcommittee of the U.S. CRMC • Oversees compliance with this Policy, Fair Lending Strategic Plans, and the mandates of Business Lines' respective Fair Lending Oversight Councils • Responsible for fair lending risk management activities and includes representation from first, second, and third lines of defense oversight groups • Reviews results of quarterly monitoring of fair lending performance and risk in high-risk Business including the BU Management Response to any related findings, if applicable • Considers and provides feedback on any other fair lending risk mitigation initiatives that require FLMC oversight • Escalates fair lending risks to the U.S. CRMC, the U.S. ERMC, and ACoB, as appropriate • Responsibilities are further defined in the Fair and Responsible Banking Framework and FLMC Mandate
Fair Lending Oversight Councils (FLOCs)	• Councils of the FLMC • 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

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U.S. Chief Compliance Officer (CCO)	• Policy owner • Recommends endorsement by the ERMC and approval by the ACoB • Annual review and approval of the Policy if unchanged or revision are not material • 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.)
Head of U.S. Compliance - Fair and Responsible Banking, CRA Program and Compliance Regulatory Change Office	• 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
Compliance Director - Fair Banking and Compliance Analytics	• 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	• First line of defense business segments are accountable for developing business strategies, 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: o Establish and implement policies and procedures incorporating the details/requirements set forth in this Policy; o Establish and implement policies and procedures incorporating the Monitoring and Control requirements set forth in this Policy; and

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	○ 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

8. Policy Review Cycle

Dates/Timing	Details
Approval Date	May 21, 2024
Effective Date	May 21, 2024
Review Frequency	Annually or more frequently if warranted by significant legal or regulatory developments
Next Review Date	May 21, 2025

9. Legal and Regulatory References

- Fair Housing Act (FHAct), 42 U.S.C. 3601-3619, 24 CFR 100-110
- Equal Credit Opportunity Act (ECOA), 15 U.S.C. 1691 et seq., 12 CFR 1002 (Regulation B)
- Unfair or Deceptive Acts or Practices (UDAP), 15 U.S.C. 45 (Section 5 of the FTC)
- Unfair, Deceptive or Abusive Acts or Practices (UDAAP), 12 U.S.C. 5531

Appendix A – List of Prohibited Factors by Source

ECOA

- Race
- Color
- Religion
- National origin
- Sex (including gender identity and sexual orientation)
- Marital status
- Age
- Receipt of Public Assistance
- Good faith exercised right under the Consumer Credit Protection Act

FHAct

- Race
- Color
- Religion
- Sex (including gender identity and sexual orientation)
- 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
- Citizenship or immigration status

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