



Purpose of the Policy

TD Asset Management Inc. ("TDAM", "we", "us", "our") wants its clients to have the best experience possible when they do business with us. If a client has a problem or concern with the service they have received, we want to address it as quickly and effectively as possible.

This Complaint Examination and Dispute Resolution Policy (the "Policy") has been established to outline the steps TDAM will take when in receipt of a complaint.

Definition of a Complaint

For the purpose of this Policy, a "Complaint" is the expression of at least one of the following three elements, which persist after being considered and examined by our External Distribution - Relationship Management Group:

- a reproach against us or one of our Portfolio Managers;
- the identification of real or potential harm to a client; or
- a request for remedial action.

Informal steps to correct a problem or concern are not considered a Complaint if the problem is resolved in the regular course of business. In the event that a problem or concern is not resolved at the Relationship Management level, the Complaint will be escalated to TDAM's Managing Director, Head of Institutional Distribution.

Complaint Examination Process

Complaints will be investigated within a reasonable period of time and clients will be provided with a written response within 90 days of receipt of the Complaint. Some complex investigations may take longer. If more time is required to complete a thorough investigation, the client will be advised in writing.

Upon review of the written response, if the client is not satisfied with the outcome, the client may choose to contact the TD Ombudsman. The estimated time the TD Ombudsman takes to review and provide a response to matters is 60 days; however complex investigations may take longer to resolve.

Clients located in Quebec also have the option of requesting that the Complaint file be transferred to the AMF for review.

Receipt of a Complaint

Upon receipt of a Complaint, an acknowledgement of receipt will be sent to the client as soon as possible, and no later than 10 calendar days. The acknowledgement of receipt will contain the following information:

- The date the Complaint was registered internally at TDAM in the Complaints register, and the right to examine the Complaint file;
- A description of the Complaint, specifying the real or potential harm, the reproach against TDAM and the requested remedial action;
- The name and contact information of the person in charge of examining Complaints;
- In the case of an incomplete Complaint, a notice requesting more information to which the client must respond within a set timeframe, failing which the Complaint will be deemed to have been abandoned;
- This Policy;
- A notice stating that if the client is not satisfied with the outcome or with the examination of the Complaint, the client can request that the Complaint file be transferred to the AMF. This notice must also mention that the AMF may offer dispute resolution services, if deemed appropriate; and
- A reminder to the client that filing a Complaint with the AMF does not interrupt the prescriptive period for civil remedies against the registrant.

Contents of a Complaint File

A Complaint file will be opened for each Complaint received. The Complaint file will include the following information:

- The Complaint and all documents provided by the client with the Complaint.
- The analysis of the Complaint including any additional information related to the Complaint.
- The written response to the Complaint.

Transferring a Complaint File to the AMF

If the client is not satisfied with the outcome or with the examination of the Complaint, the client can request that the Complaint file be transferred to the AMF. The file must contain all the documents related to the Complaint. Following the transfer, the AMF will examine the Complaint file and, if deemed appropriate, may offer dispute resolution services.

The filing of a Complaint with the AMF does not interrupt the prescriptive period of civil remedies.

Complaint Reporting Obligation

Twice a year, a declaration is filed with the AMF via the Client Reporting System confirming the number and type of Complaints received. A declaration is required even if no Complaints were received within the period. The declaration for the reporting period from January 1st to June 30th is required on or before July 30th. The declaration for the reporting period from July 1st to December 31st is required on or before January 30th.

Individual Complaints will be reported to the AMF via the Client Reporting System within a reasonable timeframe after their receipt but before the end of the applicable reporting period.

Contact Information for Persons Responsible for Examining Complaints

Clients who wish to file a Complaint may send correspondence to the following address:

Mark Cestnik
Managing Director, Head of Institutional Distribution
TD Asset Management Inc.
161 Bay Street, 34th Floor
Toronto, ON M5J 2T2
Phone Number: 416-983-7088
Email: Mark.Cestnik@tdam.com

Clients who wish to escalate unresolved Complaints to the TD Ombudsman can do so at the following address:

TD Ombudsman
P.O. Box 1, TD Centre
Toronto, Ontario M5K 1A2
Phone Number: (888) 361-0319

Email: TD.ombudsman@td.com

Approval & Effective Dates

This Policy was approved by the Policy Oversight Committee in May 2020 and is effective as of May 2020.