

# Statement on Political Contributions and Lobbying

At BMO, we believe engaging responsibly in public policy discussions benefits our customers, shareholders, stakeholders and communities. We maintain the highest ethical standards when participating in these activities—we follow BMO's Code of Conduct, internal policies and procedures, and comply with applicable laws and regulations wherever we operate.

## Corporate Political Contributions

Effective November 1, 2018, BMO does not use corporate funds to make political contributions to political parties or candidates in Canada. Prior to November 1, 2018, all political contributions made in Canada on BMO's behalf complied with applicable laws, and were reported as required (see "Reporting" section below).

In the U.S., BMO does not use corporate funds or resources to contribute to federal, state, or local candidates or party committees. U.S. law prohibits BMO Bank N.A. from contributing to federal, state, and local elections.

## Governance and Management Oversight

BMO's [Code of Conduct](#) governs our political participation and requires us to comply with legal, regulatory, and internal guidelines for political participation, including guidelines about using corporate funds to support political candidates, campaigns, committees, or other political groups. The code makes clear that certain employees may be subject to additional limitations on personal political contributions.

BMO's policies and procedures govern our interactions with public officials, including those relating to gifts and entertainment, political contributions, bribery, and required public disclosures. Our Statement on Anti-Corruption and Anti-Bribery is available on our [website](#).

BMO's Government Relations team manages BMO's lobbyist registrations and tracks lobbying communications between BMO employees and government officials for reporting purposes.

Each year, all employees complete mandatory Code of Conduct training which covers Anti-Bribery and Corruption principles,

including managing conflicts of interest. The training reviews the importance of identifying potential conflicts of interest, including outside activities that involve political participation.

## Political Action Committees (PACs) in the United States

BMO Financial Corp. (BFC, our U.S. bank holding company) sponsors two PACs—these are registered with the U.S. Federal Election Commission: (1) BFC Good Governance Fund: Federal; and (2) BFC Good Governance Fund: General. These PACs are funded by voluntary contributions from eligible employees; both PAC activities are overseen by a board of directors. BFC PACs are bipartisan—their contributions support candidates or political committees that align to BFC priorities not the political preferences or priorities of senior management. BFC is not affiliated with and does not operate or contribute to any "Super PACs."

As required by law, PAC contributions are reported to the Federal Election Commission and applicable state or local election commissions. These are publicly available at the links listed in the Reporting section of this document.

## Lobbying

BMO participates in public policy discussions on issues that affect our business and are important to our shareholders, customers, and employees. Our Government Relations team manages lobbying activity and tracks our engagement with public officials relating to public policy. Reporting on our lobbying activities is governed by our internal policies and procedures, as well as federal, provincial/state and local laws.

We communicate with public officials openly and transparently. We follow the letter and spirit of the law, consistent with our Code of Conduct and Anti-Corruption policy and procedures.

As part of our broader engagement strategy with elected officials and government stakeholders in both Canada and the United States we may engage on climate policy and sustainable finance topics and seek to do so in a manner consistent with the policy objective of net zero global emissions by 2050.

BMO is registered for its lobbying activities in jurisdictions where we are required by law. This requires disclosing topics that may be discussed with public officials and in certain instances disclosing when meetings occur. In Canada we are currently registered to lobby federally, the Province of Ontario, Province of British Columbia, and City of Toronto. BMO is registered for its lobbying activities in U.S. jurisdictions, including federally, the State of California, the State of Illinois, the State of Arizona and the City of Chicago.

In Canada, monthly federal lobbying reports are filed with the Office of the Commissioner of Lobbying of Canada (OCL). A list of our reportable communications can be found on the [OCL website](#). In the U.S., we file federal lobbying disclosure reports as required by law. These reports include quarterly expenditures on lobbying activities, the issues we lobby about and the names of individuals registered to lobby on BMO's behalf. These disclosures can be found at <https://lda.senate.gov/system/public/>.

## Trade Associations and Sponsorships

BMO is a member of industry trade associations that represent financial services and the broader business community. These associations may interact with government officials on public policy matters. Membership in or financial support of these associations does not necessarily mean that BMO supports their positions on certain issues. Where we differ, we voice our concerns as appropriate through our representatives participating in these groups or publicly as necessary. This includes on the topic of climate change, reflecting our support for the aims and objectives of the Paris Agreement.

We disclose our membership in associations engaging in advocacy with annual membership dues of \$50,000 or more, paid by BFC or BMO U.S.<sup>1</sup>:

- American Bankers Association
- Bank Policy Institute
- Business Council of Canada
- California Bankers Association
- Canadian Bankers Association
- Canadian Chamber of Commerce
- Canadian Coalition for Good Governance
- Canadian Cyber Threat Exchange
- Colorado Bankers Association
- Consumer Bankers Association
- Finance Montreal

- Illinois Bankers Association
- Indiana Bankers Association
- Institute of International Bankers
- Institute of International Finance
- International Swaps and Derivatives Association
- Securities Industry and Financial Markets Association
- The Canadian Association of Financial Institutions in Insurance
- The Clearing House
- Toronto Region Board of Trade
- Wisconsin Bankers Association

## Reporting

### a) Annual Reporting

Transparency is critical to maintaining our stakeholders' trust. For political contributions before November 1, 2018, and for lobbying activity, BMO and our affiliates have reported and complied with applicable law. We also produce a Public Accountability Statement (PAS) that includes our contributions to the Canadian economy and society. The PAS and our Sustainability and Climate Reporting summarize our sustainability performance and commitments to our stakeholders.

We continually review our practices and engage with stakeholders to better understand and respond to their requests. We also publicly report in accordance with regulatory requirements in Canada and the U.S. as noted below.

### b) Reporting on Canadian Political Contributions (prior to November 1, 2018)

Historical political contributions (provincial) are available at:

- **British Columbia:** <http://contributions.electionsbc.gov.bc.ca/>
- **Alberta:** Corporate donations not permitted as of June 15, 2015 (contributions from prior years can be found at <http://efpublic.elections.ab.ca/efContributorSearch.cfm?MID=CT>)
- **Saskatchewan:** <https://www.elections.sk.ca/candidates-political-parties/electoral-finance/contributions/>
- **Manitoba:** Corporate donations are not permitted
- **Ontario:** Corporate donations not permitted as of January 1, 2017 (contributions from prior years can be found at <https://www.elections.on.ca/en.html>)
- **Quebec:** Corporate donations are not permitted
- **New Brunswick:** <https://www.electionsnb.ca/content/enb/en.html>
- **Prince Edward Island:** <http://www.electionspei.ca/index.php?number=1046908&lang=E>
- **Nova Scotia:** Corporate donations are not permitted
- **Newfoundland & Labrador:** <https://www.elections.gov.nl.ca/elections/candidates/contributions.html>

### c) Reporting on Canadian Lobbying Activities

- **Federal:** <http://lobbycanada.gc.ca/app/secure/ocl/lrs/do/advSrch?lang=eng>
- **Ontario:** <http://lobbyist.oico.on.ca/Pages/Public/PublicSearch/Default.aspx>
- **British Columbia:** [Lobbyists Registry - Lobbyists Registry - Office of the Registrar of Lobbying of BC](#)
- **Toronto:** <http://app.toronto.ca/lobbyistsearch/disclaimer.do>

### d) Reporting on U.S. Political Contributions

Information on political contributions made through BMO's political action committees is available at:

- **Contributions to Federal Candidates:** [www.fec.gov](http://www.fec.gov)

Contributions to State Candidates:

- **The Illinois State Board of Elections website:** [www.elections.il.gov](http://www.elections.il.gov)
- **Wisconsin Ethics Commission website:** [cfis.wi.gov/](http://cfis.wi.gov/)

### e) Reporting on U.S. Lobbying Activities

- **Federal:** <https://soprweb.senate.gov/index.cfm?event=selectfields>
- **California:** <https://cal-access.sos.ca.gov/lobbying/>
- **Illinois:** <https://apps.ilsos.gov/lobbyistsearch/>
- **Arizona:** <https://seethemoney.az.gov/>
- **City of Chicago:** [https://webapps1.chicago.gov/elf/public\\_search.html](https://webapps1.chicago.gov/elf/public_search.html)

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