

GRI Index

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GRI Disclosure	Description	2020 Location/Commentary/Explanation for Omission
GENERAL DISCLOSURES		
Organizational Profile		
GRI 102-1	Name of the organization.	Bank of Montreal.
GRI 102-2	Activities, brands, products, and services.	Bank of Montreal brands the member companies of the organization as “BMO Financial Group.” As such, in this report, the names BMO and BMO Financial Group mean Bank of Montreal together with its subsidiaries. Further information: pages 15 and 207 of the AR.
GRI 102-3	Location of headquarters.	BMO’s head office is located at 129 rue Saint-Jacques, Montreal, Quebec, H2Y 1L6, and its executive offices are located at 100 King Street West, 1 First Canadian Place, Toronto, Ontario, M5X 1A1.
GRI 102-4	Location of operations.	The topics addressed in the 2020 Sustainability Report and PAS cover our enterprise-wide operations, unless otherwise specified. Further information: page 207 of the AR (Operating and Geographic Segmentation) and page 210 of the AR (Significant Subsidiaries).
GRI 102-5	Ownership and legal form.	Bank of Montreal is a chartered bank under the <i>Bank Act</i> (Canada) and is a public company incorporated in Canada. Our common shares are listed on the Toronto Stock Exchange and New York Stock Exchange. These shares are widely held by institutional and retail shareholders. Further information: page 150 of the AR.

Annual Information Form: <https://www.bmo.com/home/about/banking/investor-relations/annual-reports-proxy-circulars>

BMO Financial Group 2020 Annual Report to Shareholders: <https://www.bmo.com/home/about/banking/investor-relations/annual-reports-proxy-circulars>

2019 Employment Equity Narrative Report: <https://corporate-responsibility.bmo.com/reports/>

2020 Sustainability Report and Public Accountability Statement: <https://corporate-responsibility.bmo.com/reports/>

Notice of Annual Meeting of Shareholders and Management Proxy Circular: <https://www.bmo.com/home/about/banking/investor-relations/annual-reports-proxy-circulars>

GRI Disclosure	Description	2020 Location/Commentary/Explanation for Omission
GRI 102-6	Markets served.	We conduct our business through three operating groups: <ul style="list-style-type: none"> • Personal and Commercial Banking • BMO Wealth Management • BMO Capital Markets Further information: page 207 of the AR.
GRI 102-7	Scale of the organization.	See inside front cover of the 2020 Sustainability Report and PAS (About BMO). Further information: pages 15 and 207 of the AR.
GRI 102-8	Information on employees and other workers.	See page 112 of the 2020 Sustainability Report and PAS (BMO Headcount). Further information: page 5 of the EENR (Highlights of representation for women in 2019).
GRI 102-9	Supply chain.	In 2020, we purchased goods and services in North America with a total cost of approximately CAD\$5.3 billion from approximately 7,903 suppliers. Of that amount, approximately CAD\$3.7 billion was spent through our Canadian operations and approximately CAD\$1.6 billion was spent through our U.S. operations.
GRI 102-10	Significant changes to the organization and its supply chain.	None.
GRI 102-11	Precautionary Principle or approach.	For our approach to risk management in our financing and lending activities, see page 26 of the 2020 Sustainability Report and PAS (Environmental and Social Risk Management). Further information: page 112 of the AR (Environmental and Social Risk) and page 59 of the 2020 Sustainability Report and PAS (Climate Report).
GRI 102-12	External initiatives.	<ul style="list-style-type: none"> • 30% Club • Carbon Disclosure Project • Catalyst Accord • Climate Action 100+ • Equator Principles • ISO 14001 Environmental Management System • Leadership in Energy and Environmental Design (LEED) • Sustainability Accounting Standards Board Financial Industry Advisory Group • Task Force on Climate-related Financial Disclosures (TCFD) • United Nations Environment Programme – Finance Initiative • United Nations Global LGBTI Standards of Conduct for Business • United Nations Principles for Responsible Investing • United Nations Universal Declaration of Human Rights • United Nations Women’s Empowerment Principles • BlackNorth Pledge

GRI Disclosure	Description	2020 Location/Commentary/Explanation for Omission
GRI 102-13	Membership of associations.	<ul style="list-style-type: none"> • American Bankers Association • Bank Policy Institute • Canadian Bankers Association • Chicagoland Chamber of Commerce • Corporate Governance Advisory Committee • Council of Institutional Investors • Finance Montreal • Global Investor Governance Network • Global Network Initiative • Illinois Bankers Association • Illinois Chamber of Commerce • International Swaps and Derivatives Association • Institute of International Bankers • Institutional Investors Group on Climate Change • International Corporate Governance Network • Investment Association • Investor Forum • Information Systems Audit and Control Association (ISACA) • Loan Syndications and Trading Association • Metropolitan Milwaukee Association of Commerce • Mutual Fund Dealers Association of Canada • National Futures Association • Responsible Investment Association (Canada) • Securities Industry and Financial Markets Association • The Canadian Association of Financial Institutions in Insurance • Toronto Finance International • U.K. Sustainable Investment and Finance Association • U.S. Chamber of Commerce • Wisconsin Bankers Association

GRI Disclosure	Description	2020 Location/Commentary/Explanation for Omission
Strategy		
GRI 102-14	Statement from senior decision-maker.	See page 3 of the 2020 Sustainability Report and PAS (Message from the CEO, BMO Financial Group) and page 4 of the 2020 Sustainability Report and PAS (Message from the Chair, BMO Sustainability Council).
GRI 102-15	Key impacts, risks, and opportunities.	<p>For risks related to environmental, social and governance (ESG) practices and activities, see page 112 of the AR (Environmental and Social Risk) and page 113 of the AR (Reputation Risk).</p> <p>For BMO's approach to risks and opportunities related to climate change, see page 59 of the 2020 Sustainability Report and PAS (Climate Report). Interests of our stakeholders are disclosed on pages 11–12 of the 2020 Sustainability Report and PAS (Engaging Our Stakeholders).</p> <p>Our approach to environmental and social risk management is discussed on page 26 of the 2020 Sustainability Report and PAS (Environmental and Social Risk Management).</p> <p>Further information: BMO's 2020 CDP Response BMO's Statement on Human Rights Page 57 of the 2020 Sustainability Report and PAS (Human Rights) BMO's Statement Against Modern Slavery and Human Trafficking</p>
Ethics and Integrity		
GRI 102-16	Values, principles, standards, and norms of behaviour.	<p>See page 48 of the 2020 Sustainability Report and PAS (Business Conduct).</p> <p>Further information: BMO's Code of Conduct BMO's Supplier Code of Conduct BMO Statement on Human Rights BMO's Statement Against Modern Slavery and Human Trafficking</p>
GRI 102-17	Mechanisms for advice and concerns about ethics.	See page 49 of the 2020 Sustainability Report and PAS (Business Conduct (Speak Up!)).
Governance		
GRI 102-18	Governance structure.	<p>Our Board's oversight of issues related to sustainability is discussed on page 51 of the 2020 Sustainability Report and PAS (Corporate Governance). In addition, Board Committee charters are available on BMO's website under Corporate Governance and Board Committees</p> <p>Further information: page 59 of the 2020 Sustainability Report and PAS (Climate Report).</p>
GRI 102-19	Delegating authority.	<p>The CEO has delegated responsibility for sustainability, including climate change, to BMO's General Counsel, who is a member of BMO's Executive Committee and reports directly to the CEO. BMO has appointed a Chief Sustainability Officer (CSO), who is situated in Corporate Affairs and reports to the Corporate Secretary and to the General Counsel.</p> <p>The CSO is responsible for the development and execution of sustainability strategy, including internal advisory and support efforts, stakeholder engagement and disclosure.</p> <p>Further information: page 59 of the 2020 Sustainability Report and PAS (Climate Report).</p>

2020 CDP Response: <https://corporate-responsibility.bmo.com/our-practices/environmental-stewardship/enviro-targets-performances/>
Statement on Human Rights: <http://corporate-responsibility.bmo.com/our-approach/statement-on-current-issues/>
Statement Against Modern Slavery and Human Trafficking: <http://corporate-responsibility.bmo.com/our-approach/statement-on-current-issues>
Code of Conduct: <http://www.bmo.com/home/about/banking/corporate-info/codeofconduct?nav=left>

Supplier Code of Conduct: <http://www.bmo.com/home/about/banking/corporate-information/supplier-information/supplier-code-of-conduct>
Website under Corporate Governance and Board Committees: <http://www.bmo.com/home/about/banking/corporate-governance>

GRI Disclosure	Description	2020 Location/Commentary/Explanation for Omission
GRI 102-20	Executive-level responsibility for economic, environmental, and social topics.	A Sustainability Council was established in 2008, chaired by BMO's General Counsel and composed of senior leaders from across the organization. The Sustainability Council meets quarterly to support and advise on the implementation of BMO's sustainability strategy, and to discuss sustainability topics that include risks, opportunities and disclosures. Further information: page 52 of the 2020 Sustainability Report and PAS (Sustainability Governance).
GRI 102-21	Consulting stakeholders on economic, environmental, and social topics.	See page 10 (Partnerships for the Goals) and pages 11–12 (Engaging Our Stakeholders) of the 2020 Sustainability Report and PAS. See our Shareholder Engagement Policy
GRI 102-22	Composition of the highest governance body and its committees.	See Board of Directors on our website See Board Committees on our website Further information: pages 12–35 of the PC (Directors and Corporate Governance).
GRI 102-23	Chair of the highest governance body.	The Chair of the Board of Directors is not an executive officer.
GRI 102-24	Nominating and selecting the highest governance body.	See our Governance and Nominating Committee Charter, Director Independence Standards and Board Diversity Policy on our website Further information: page 12 of the PC (Directors).
GRI 102-25	Conflicts of interest.	See page 42 of the PC (Ethical Business Conduct).
GRI 102-26	Role of the highest governance body in setting purposes, values, and strategy.	Sustainability issues fall within the mandate of the Board of Directors and several of its committees. Enterprise and group strategies are reviewed with the Executive Committee and the Board of Directors annually in interactive sessions that challenge assumptions and strategies in the context of both the current and the potential future business environment. Further information: page 52 of the 2020 Sustainability Report and PAS (Sustainability Governance) and page 112 of the AR (Strategic Risk).
GRI 102-27	Collective knowledge of highest governance body.	BMO's directors are recruited and evaluated based on a skills matrix that includes experience related to sustainability. Seven of our eleven independent Board members have such experience. New and current Board members receive training on sustainability topics. Training related to climate change risks and disclosure is available to all of BMO's directors. See page 52 of the 2020 Sustainability Report and PAS (Sustainability Governance). Further information: page 24 of the PC (Skills Matrix) and page 59 of the 2020 Sustainability Report and PAS (Climate Report).
GRI 102-28	Evaluating the highest governance body's performance.	The Governance and Nominating Committee of the Board of Directors is responsible for monitoring and evaluating the process for assessing the performance and effectiveness of the Board and committees of the Board (including a self-assessment of this committee), which takes into account the Board Mandate or Board Committee charters as applicable. Further information: Governance and Nominating Committee Charter, available on our website
GRI 102-29	Identifying and managing economic, environmental, and social impacts.	The Executive Committee (EC), composed of our most senior leaders, is responsible for ensuring the overall sound governance and management of all aspects of our operations. The EC also oversees the execution of all strategies and business plans and reviews their effectiveness. Further information: see Other Committees on our website

Shareholder Engagement Policy: <http://www.bmo.com/home/about/banking/corporate-governance/about-us/shareholder-engagement-policy>

Board of Directors: <http://www.bmo.com/home/about/banking/corporate-governance/board-of-directors>

Board Committees: <http://www.bmo.com/home/about/banking/corporate-governance>

Governance and Nominating Committee Charter, Director Independence Standards and Board Diversity Policy: <http://www.bmo.com/home/about/banking/corporate-governance/select-documents>

Other Committees: <https://www.bmo.com/main/about-bmo/corporate-governance/other-committees/>

GRI Disclosure	Description	2020 Location/Commentary/Explanation for Omission
GRI 102-30	Effectiveness of risk management processes.	<p>The Risk Review Committee of the Board of Directors is responsible for assisting the Board in fulfilling its oversight responsibilities regarding BMO's identification and management of risk, adherence to risk management corporate policies and compliance with risk-related regulatory requirements. The Risk Review Committee Charter is available on our website</p> <p>The Risk Management Committee is BMO management's senior risk committee.</p> <p>Further information: page 80 of the AR (Risk Governance Framework).</p>
GRI 102-31	Review of economic, environmental, and social topics.	<p>The Audit and Conduct Review Committee of the Board of Directors meets as frequently as it determines necessary, but not less than once each quarter. The committee is responsible for approving BMO's Sustainability Report prior to disclosure and for assessing the effectiveness of BMO's governance of sustainability issues. The Audit and Conduct Review Committee Charter is available on our website</p> <p>The Risk Review Committee of the Board of Directors meets as frequently as it determines necessary, but not less than once each quarter. The committee has in-depth discussions with management at each committee meeting on risk management and risk strategies related to key businesses and products. For details on identification, analysis and management of risk, see page 35 of the PC (Report of the Risk Review Committee).</p> <p>Further information: page 26 of the 2020 Sustainability Report and PAS (Environmental and Social Risk Management), page 52 of the 2020 Sustainability Report and PAS (Sustainability Governance) and page 59 of the 2020 Sustainability Report and PAS (Climate Report).</p>
GRI 102-32	Highest governance body's role in sustainability reporting.	<p>Board-level oversight of sustainability is embedded in the charter of our Board's Audit and Conduct Review Committee. This committee meets regularly with the Chief Sustainability Officer and the Corporate Secretary and the General Counsel to review and discuss the findings disclosed in the BMO Sustainability Report and to discuss matters related to sustainability, including climate change. In December 2020, the Sustainability Report and climate-related disclosure were reviewed by the full Board of Directors.</p> <p>See page 52 of the 2020 Sustainability Report and PAS (Sustainability Governance).</p> <p>Further information: page 44 of the PC (Audit and Conduct Review Committee), pages 47-48 of the PC (Sustainability) and page 59 of the 2020 Sustainability Report and PAS (Climate Report).</p>
GRI 102-33	Communicating critical concerns.	<p>Critical concerns are reported to the Board of Directors in the form of a report. For example, any non-compliance issues that arise are reported quarterly to the Audit and Conduct Review Committee.</p>
GRI 102-34	Nature and total number of critical concerns.	<p>Not disclosed.</p> <p>Reason for omission: Confidentiality constraints.</p> <p>Explanation: BMO considers this type of information confidential.</p>
GRI 102-35	Remuneration policies.	<p>For BMO's approach to executive compensation and 2019 results and compensation, see page 59 of the PC (Compensation Discussion and Analysis).</p>
GRI 102-36	Process for determining remuneration.	<p>For BMO's approach to executive compensation and 2019 results and compensation, see page 59 of the PC (Compensation Discussion and Analysis).</p>
GRI 102-37	Stakeholders' involvement in remuneration.	<p>See page 66 of the PC (Independent advice).</p>
GRI 102-38	Annual total compensation ratio.	<p>Not disclosed.</p> <p>Reason for omission: Confidentiality constraints.</p> <p>Explanation: For those who are interested, our annual reports and management proxy circulars include the relevant information from which shareholders can calculate the ratio of CEO pay to the average compensation of our full-time equivalent employees.</p>
GRI 102-39	Percentage increase in annual total compensation ratio.	<p>See above.</p>

Risk Review Committee Charter: <http://www.bmo.com/home/about/banking/corporate-governance/select-documents>
Audit and Conduct Review Committee Charter: <http://www.bmo.com/home/about/banking/corporate-governance/select-documents>

GRI Disclosure	Description	2020 Location/Commentary/Explanation for Omission
Stakeholder Engagement		
GRI 102-40	List of stakeholder groups.	See pages 11–12 of the 2020 Sustainability Report and PAS (Engaging Our Stakeholders).
GRI 102-41	Collective bargaining agreements.	Currently, no BMO employees are covered by collective bargaining agreements. For BMO's position on freedom of association and collective bargaining, refer to our website .
GRI 102-42	Identifying and selecting stakeholders.	See pages 11–12 of the 2020 Sustainability Report and PAS (Engaging Our Stakeholders).
GRI 102-43	Approach to stakeholder engagement.	See pages 11–12 of the 2020 Sustainability Report and PAS (Engaging Our Stakeholders). For engagement undertaken specifically as part of the report preparation process, see GRI 102-46 and page 13 of the 2020 Sustainability Report and PAS (Materiality).
GRI 102-44	Key topics and concerns raised.	See pages 11–12 of the 2020 Sustainability Report and PAS (Engaging Our Stakeholders). For a list of priority topics, see page 13 of the 2020 Sustainability Report and PAS (Materiality Matrix).
Reporting Practice		
GRI 102-45	Entities included in the consolidated financial statements.	For information about the inter-corporate relationships between Bank of Montreal and its significant subsidiaries, see page 210 of the AR (Significant Subsidiaries).
GRI 102-46	Defining report content and topic Boundaries.	See page 13 of the 2020 Sustainability Report and PAS (Materiality).
GRI 102-47	List of material topics.	See page 13 of the 2020 Sustainability Report and PAS (Materiality).
GRI 102-48	Restatements of information.	The following information has been restated in this report: <ul style="list-style-type: none"> Enterprise-wide Net Promoter Score – 2019 value has been restated in this report to reflect the final calculated value as disclosed on page 83 of the PC. Open positions filled by internal candidates – in 2020 we updated our methodology to exclude campus interns which by their nature are filled by external candidates. 2018 and 2019 values have been restated.
GRI 102-49	Changes in reporting.	Data in this year's report is enterprise-wide, unless otherwise stated. Where there have been changes in measurement methods, we have identified those changes in a footnote.
GRI 102-50	Reporting period.	BMO's 2020 Sustainability Report and PAS covers our 2020 fiscal year (November 1, 2019 to October 31, 2020).
GRI 102-51	Date of most recent report.	Our most recent previous report is our 2019 Sustainability Report and PAS, published in December 2019.

Statement on freedom of association and collective bargaining: <https://corporate-responsibility.bmo.com/our-approach/statement-on-current-issues/>

GRI Disclosure	Description	2020 Location/Commentary/Explanation for Omission
GRI 102-52	Reporting cycle.	Annual.
GRI 102-53	Contact point for questions regarding the report.	sustainability@bmo.com
GRI 102-54	Claims of reporting in accordance with the GRI Standards.	This report has been prepared in accordance with the GRI Standards: Core option.
GRI 102-55	GRI content index.	This table.
GRI 102-56	External assurance.	See page 109 of the 2020 Sustainability Report and PAS (Independent Limited Assurance Report by KPMG LLP, Bank of Montreal's auditor).

ECONOMIC PERFORMANCE

GRI 103-1	Explanation of the material topic and its Boundary.	See page 7 of the 2020 Sustainability Report and PAS(How We Create Value). Further information: Page 4 of the AR (Chair's Message), page 5 of the AR (Chief Executive Officer's Message), page 2 of the AR (Financial Snapshot) and page 145 of the AR (Consolidated Financial Statements).
GRI 103-2	The management approach and its components.	See above.
GRI 103-3	Evaluation of the management approach.	See above.
GRI 201-1	Direct economic value generated and distributed.	See page 7 of the 2020 Sustainability Report and PAS (How We Create Value). See also BMO's PAS on page 111 of the 2020 Sustainability Report and PAS. See also BMO's Statement on Tax Principles .
GRI 201-3	Defined benefit plan obligations and other retirement plans.	We provide and/or contribute to pension and/or retirement savings plans for eligible employees globally. See page 42 of the 2020 Sustainability Report and PAS (BMO Canada Pension Plan).
GRI 201-4	Financial assistance received from government.	None.

GRI Disclosure	Description	2020 Location/Commentary/Explanation for Omission
MATERIAL ISSUES		
Business Conduct		
GRI 103-1	Explanation of the material topic and its Boundary.	See page 48 of the 2020 Sustainability Report and PAS (Business Conduct). For details on the Boundary of this topic, see page 104 of the 2020 Sustainability Report and PAS.
GRI 103-2	The management approach and its components.	See above.
GRI 103-3	Evaluation of the management approach.	See above.
GRI 412-2	Employee training on human rights policies or procedures.	Annually, BMO employees are required to complete ethics, legal and compliance (ELCT) training, which includes modules on anti-corruption, anti-money laundering and anti-terrorist financing. As part of the ELCT process, employees certify adherence to BMO's Code of Conduct.
GRI 419-1	Non-compliance with laws and regulations in the social and economic area.	See page 78 of the 2020 Sustainability Report and PAS (SASB Disclosures FN-CB-510a.1, FN-CF-220a.2 and FN-AC-270a.2).
Climate Change		
GRI 103-1	Explanation of the material topic and its Boundary.	See page 59 of the 2020 Sustainability Report and PAS (Climate Report). For details on the Boundary of this topic, see page 104 of the 2020 Sustainability Report and PAS.
GRI 103-2	The management approach and its components.	See above.
GRI 103-3	Evaluation of the management approach.	See above.
GRI 201-2	Financial implications and other risks and opportunities due to climate change.	See above.
GRI 302-1	Energy consumption within the organization.	See BMO's Operational Efficiency Report See BMO's 2020 CDP Response
GRI 302-3	Energy intensity.	See BMO's 2020 CDP Response
GRI 302-4	Reduction of energy consumption.	See BMO's Operational Efficiency Report See BMO's 2020 CDP Response See Carbon Neutrality – Achieving Our Goal
GRI 303-1	Interactions with water as a shared resource.	See BMO's Operational Efficiency Report

Operational Efficiency Report: <https://corporate-responsibility.bmo.com/our-practices/environmental-stewardship/enviro-targets-performances/>

2020 CDP Response: <https://corporate-responsibility.bmo.com/our-practices/environmental-stewardship/enviro-targets-performances/>

Carbon Neutrality – Achieving Our Goal: <https://corporate-responsibility.bmo.com/our-practices/environmental-stewardship/>

GRI Disclosure	Description	2020 Location/Commentary/Explanation for Omission
GRI 305-1	Direct (Scope 1) GHG emissions.	See page 14 of the 2020 Sustainability Report and PAS (Sustainability Scorecard – Scope 1 emissions data) and page 59 of the 2020 Sustainability Report and PAS (Climate Report). See BMO's Operational Efficiency Report See BMO's 2020 CDP Response
GRI 305-2	Energy indirect (Scope 2) GHG emissions.	See page 14 of the 2020 Sustainability Report and PAS (Sustainability Scorecard – Scope 2 emissions data) and page 59 of the 2020 Sustainability Report and PAS (Climate Report). See BMO's Operational Efficiency Report See BMO's 2020 CDP Response
GRI 305-3	Energy indirect (Scope 3) GHG emissions.	See page 14 of the 2020 Sustainability Report and PAS (Sustainability Scorecard – Scope 3 emissions data) and page 59 of the 2020 Sustainability Report and PAS (Climate Report). See BMO's Operational Efficiency Report See BMO's 2020 CDP Response
GRI 305-4	GHG emissions intensity.	See page 59 of the 2020 Sustainability Report and PAS (Climate Report). See BMO's Operational Efficiency Report See BMO's 2020 CDP Response
GRI 305-5	Reduction of GHG emissions.	See page 14 of the 2020 Sustainability Report and PAS (Sustainability Scorecard) and page 59 of the 2020 Sustainability Report and PAS (Climate Report). See BMO's Operational Efficiency Report See BMO's 2020 CDP Response See BMO's Environmental Policy and Approach
GRI 307-1	Non-compliance with environmental laws and regulations.	BMO has not paid any significant fines and was not otherwise sanctioned for non-compliance with environmental laws or regulations in fiscal 2020.
Community Impact		
GRI 103-1	Explanation of the material topic and its Boundary.	See page 44 of the 2020 Sustainability Report and PAS (Community Impact). For details on the Boundary of this topic, see page 104 of the 2020 Sustainability Report and PAS.
GRI 103-2	The management approach and its components.	See above.
GRI 103-3	Evaluation of the management approach.	See above.
GRI 203-2	Significant indirect economic impacts.	See page 44 of the 2020 Sustainability Report and PAS (Community Impact). Further information: page 30 of the 2020 Sustainability Report and PAS (Financial Inclusion).

Operational Efficiency Report: <https://corporate-responsibility.bmo.com/our-practices/environmental-stewardship/enviro-targets-performances/>

2020 CDP Response: <https://corporate-responsibility.bmo.com/our-practices/environmental-stewardship/enviro-targets-performances/>

Environmental Policy and Approach: <https://corporate-responsibility.bmo.com/our-practices/environmental-stewardship/environmental-policy-and-approach/>

GRI Disclosure	Description	2020 Location/Commentary/Explanation for Omission
Consumer Protection and Transparency		
GRI 103-1	Explanation of the material topic and its Boundary.	See page 50 of the 2020 Sustainability Report and PAS (Consumer Protection and Transparency). For details on the Boundary of this topic, see page 104 of the 2020 Sustainability Report and PAS.
GRI 103-2	The management approach and its components.	See above.
GRI 103-3	Evaluation of the management approach.	See above.
FS15	Policies for the fair design and sale of financial products and services.	See page 88 of the 2020 Sustainability Report and PAS (SASB Disclosure FN-AC-270a.3 – Description of approach to informing customers about products and services). Further information: Page 48 of the 2020 Sustainability Report and PAS (Business Conduct) and page 50 of the 2020 Sustainability Report and PAS (Consumer Protection and Transparency). BMO Code of Conduct. Voluntary codes of conduct and public commitments regarding fair design and sale of financial products and services on our website What you need to know about Coercive Tied Selling
Corporate Governance		
GRI 103-1	Explanation of the material topic and its Boundary.	See page 51 of the 2020 Sustainability Report and PAS (Corporate Governance). For details on the Boundary of this topic, see page 104 of the 2020 Sustainability Report and PAS.
GRI 103-2	The management approach and its components.	See above.
GRI 103-3	Evaluation of the management approach.	See above.
GRI 405-1	Diversity of governance bodies and employees.	See page 14 of the 2020 Sustainability Report and PAS (Sustainability Scorecard – Women on Board of Directors) and page 15 of the 2020 Sustainability Report and PAS (Sustainability Scorecard – Diversity and Inclusion).
Customer Experience		
GRI 103-1	Explanation of the material topic and its Boundary.	See page 53 of the 2020 Sustainability Report and PAS (Customer Experience). For details on the Boundary of this topic, see page 104 of the 2020 Sustainability Report and PAS.
GRI 103-2	The management approach and its components.	See above.
GRI 103-3	Evaluation of the management approach.	See above.
See GRI 102-43 and GRI 102-44		

Financial products and services on our website: <http://www.bmo.com/home/popups/global/codes-of-conduct>
Coercive Tied Selling: http://www.bmo.com/bmo/files/images/3/1/CoerciveTiedSelling_eng.pdf

GRI Disclosure	Description	2020 Location/Commentary/Explanation for Omission
Data Security		
GRI 103-1	Explanation of the material topic and its Boundary.	See page 55 of the 2020 Sustainability Report and PAS (Data Security). For details on the Boundary of this topic, see page 104 of the 2020 Sustainability Report and PAS.
GRI 103-2	The management approach and its components.	See above.
GRI 103-3	Evaluation of the management approach.	See above.
GRI 418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data.	See page 15 of the 2020 Sustainability Report and PAS (Sustainability Scorecard – Substantiated complaints regarding breaches of customer privacy and losses of customer data).
Diversity and Inclusion		
GRI 103-1	Explanation of the material topic and its Boundary.	See page 38 of the 2020 Sustainability Report and PAS (Diversity and Inclusion). For details on the Boundary of this topic, see page 104 of the 2020 Sustainability Report and PAS.
GRI 103-2	The management approach and its components.	See above.
GRI 103-3	Evaluation of the management approach.	See above.
GRI 405-1	Diversity of governance bodies and employees.	See page 14 of the 2020 Sustainability Report and PAS (Sustainability Scorecard – Women on Board of Directors) and page 15 of the 2020 Sustainability Report and PAS (Sustainability Scorecard – Diversity and Inclusion).
Environmental and Social Risk Management		
GRI 103-1	Explanation of the material topic and its Boundary.	See page 26 of the 2020 Sustainability Report and PAS (Environmental and Social Risk Management). For details on the Boundary of this topic, see page 104 of the 2020 Sustainability Report and PAS.
GRI 103-2	The management approach and its components.	See above.
GRI 103-3	Evaluation of the management approach.	See above.
FS1	Policies with specific environmental and social components applied to business lines.	See above. Further information: page 112 of the AR (Environmental and Social Risk), the Equator Principles Report and page 59 of the 2020 Sustainability Report and PAS (Climate Report).
FS2	Procedures for assessing and screening environmental and social risks in business lines.	See above. Further information: page 112 of the AR (Environmental and Social Risk), the Equator Principles Report and page 59 of the 2020 Sustainability Report and PAS (Climate Report).

GRI Disclosure	Description	2020 Location/Commentary/Explanation for Omission
FS3	Processes for monitoring clients' implementation of and compliance with environmental and social requirements included in agreements or transactions.	See above.
FS4	Process(es) for improving staff competency to implement the environmental and social policies and procedures as applied to business lines.	See above.
FS9	Coverage and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures.	See above.
Employee Experience		
GRI 103-1	Explanation of the material topic and its Boundary.	See page 41 of the 2020 Sustainability Report and PAS (Employee Experience). For details on the Boundary of this topic, see page 104 of the 2020 Sustainability Report and PAS.
GRI 103-2	The management approach and its components.	See above.
GRI 103-3	Evaluation of the management approach.	See above.
See GRI 102-43 and GRI 102-44		
GRI 401-1	New employee hires and employee turnover.	See page 41 of the 2020 Sustainability Report and PAS (Employee Experience). Voluntary turnover rates are provided with a breakdown by gender and region, but not by age. Reason for omission: Information unavailable.
GRI 401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees.	See page 41 of the 2020 Sustainability Report and PAS (Employee Experience).
GRI 404-1	Average hours of training per year per employee.	See page 15 of the 2020 Sustainability Report and PAS (Sustainability Scorecard – Average training hours per full-time equivalent employee) and page 41 of the 2020 Sustainability Report and PAS (Employee Experience). A breakdown of average hours of training by gender and employee category is not disclosed. Reason for omission: Not applicable (training by gender). Explanation: Investments in training are made across the entire employee base (gender does not enter into these determinations).
GRI 404-3	Percentage of employees receiving regular performance reviews.	See page 15 of the 2020 Sustainability Report and PAS (Sustainability Scorecard – Employees receiving annual performance reviews).

GRI Disclosure	Description	2020 Location/Commentary/Explanation for Omission
Financial Inclusion		
GRI 103-1	Explanation of the material topic and its Boundary.	See page 30 of the 2020 Sustainability Report and PAS (Financial Inclusion). For details on the Boundary of this topic, see page 104 of the 2020 Sustainability Report and PAS.
GRI 103-2	The management approach and its components.	See above.
GRI 103-3	Evaluation of the management approach.	See above.
FS13	Access points in low-populated or economically disadvantaged areas by type.	See page 30 of the 2020 Sustainability Report and PAS (Financial Inclusion).
FS14	Initiatives to improve access to financial services for disadvantaged people.	See page 30 of the 2020 Sustainability Report and PAS (Financial Inclusion). BMO is committed to creating specialized products and services that make our offerings more accessible, and making our facilities and services accessible to everyone. Initiatives include level or ramped entries to our branches, lower height of our ATMs, account information and print materials in alternative formats (e.g., large print, Braille, audio or e-text statements), TTY/TTD (teletypewriter device), Bell Relay Service and sign language interpreter (ASL for English and LSQ for French). Further information on our website
FS16	Initiatives to enhance financial literacy by type of beneficiary.	See page 35 of the 2020 Sustainability Report and PAS (Financial Literacy).
Human Rights		
GRI 103-1	Explanation of the material topic and its Boundary.	See page 57 of the 2020 Sustainability Report and PAS (Human Rights). For details on the Boundary of this topic, see page 104 of the 2020 Sustainability Report and PAS.
GRI 103-2	The management approach and its components.	See above.
GRI 103-3	Evaluation of the management approach.	See above.
See GRI 412-2		
Responsible Investing		
GRI 103-1	Explanation of the material topic and its Boundary.	See page 22 of the 2020 Sustainability Report and PAS (Responsible Investing). For details on the Boundary of this topic, see page 104 of the 2020 Sustainability Report and PAS.
GRI 103-2	The management approach and its components.	See above.
GRI 103-3	Evaluation of the management approach.	See above.

Further information on our website: <https://www.bmo.com/home/about/banking/accessibility>

GRI Disclosure	Description	2020 Location/Commentary/Explanation for Omission
GRI 203-1	Infrastructure investments and services supported.	BMO made US\$302.8 million in community development investments in the United States in 2020 (this is included in our sustainable finance tracking on page 18 of the 2020 Sustainability Report and PAS). See also page 22 of the 2020 Sustainability Report and PAS (Responsible Investing).
FS10	Percentage and number of companies held in the institution's portfolio with which the organization has interacted on environmental and social issues.	We disclose the number of companies we engaged with and the number of board-level meetings with companies, but not the percentages. See page 22 of the 2020 Sustainability Report and PAS (Responsible Investing).
FS12	Voting polic(ies) applied to environmental or social issues for shares over which the reporting organization holds the right to vote shares or advises on voting.	See page 86 of the 2020 Sustainability Report and PAS (SASB Disclosure FN-AC-410a.3).

Sustainable Finance

GRI 103-1	Explanation of the material topic and its Boundary.	See page 18 of the 2020 Sustainability Report and PAS (Sustainable Finance). For details on the Boundary of this topic, see page 104 of the 2020 Sustainability Report and PAS.
GRI 103-2	The management approach and its components.	See above.
GRI 103-3	Evaluation of the management approach.	See above.
FS5	Interactions with clients/investees/business partners regarding environmental and social risks and opportunities.	We work with our clients and suppliers to understand and manage social and environmental risks, and to take advantage of opportunities. BMO's Sustainable Finance team is responsible for mobilizing the enterprise to pursue opportunities that involve sustainability with customers across all lines of business, and its mandate includes client advisory. BMO's Responsible Investing team within BMO GAM has an extensive investee engagement program. Further information: page 18 of the 2020 Sustainability Report and PAS (Sustainable Finance) and page 22 of the 2020 Sustainability Report and PAS (Responsible Investing).

ADDITIONAL INFORMATION (not related to the priority topics)

GRI 403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and total number of work-related fatalities.	During fiscal 2020, 87,157 sick days were recorded by our employees in North America. Given the COVID-19 pandemic and BMO's support for employees requiring time off, absences due to sick days declined relative to prior years. COVID-related days away from work for reasons including child and family care, quarantine requirements and illness, were recorded as excused paid days. A breakdown of sick days and work-related fatalities by region or by gender is not disclosed. We did not record any work-related fatalities in fiscal 2020. Reason for omission: Not applicable. Explanation: We do not see any gender or regional differences between our male and female employee populations that would significantly affect risk of injury or illness.
GRI 415-1	Political contributions.	BMO supports efforts to enhance the transparency of the electoral systems in the jurisdictions in which it does business. BMO does not use corporate funds to make donations to political candidates or parties in Canada or the United States. In the United States: There are two Political Action Committees connected with BMO Financial Corp. that are registered with the U.S. Federal Election Commission (FEC): the BMO Financial Corp Good Governance Fund – Federal, and the BMO Financial Corporation Good Governance Fund – General. Over the period from November 1, 2019 to October 31, 2020, these funds contributed a total of US\$102,389 to political candidates and committees in the United States. These contributions were made from the BMO Financial Corp Good Governance Fund – Federal and the BMO Financial Corporation Good Governance Fund – General in the amounts of US\$101,300 and US\$1,089, respectively. Further information: Statement on Political Contributions and Lobbying

Statement on Political Contributions and Lobbying: <https://corporate-responsibility.bmo.com/our-approach/statement-on-current-issues/>

BMO Material Issue	Boundary	
	Internal (within BMO)	External (outside of BMO)
Table for GRI 102-47		
Business Conduct	X	X
Climate Change	X	X
Community Impact	X	X
Consumer Protection and Transparency	X	X
Corporate Governance	X	
Customer Experience		X
Data Security	X	X
Diversity and Inclusion	X	X
Employee Experience	X	
Environmental and Social Risk Management	X	X
Financial Inclusion	X	X
Human Rights	X	X
Sustainable Finance	X	X