

BMO Financial Group

# 2021 GRI Index

The **Global Reporting Initiative (GRI)** is an independent, international organization that provides widely used standards for sustainability reporting – the GRI Sustainability Reporting Standards (GRI Standards). The GRI Standards are intended to be used by organization to report about their impacts on the economy, the environment and/or society.

BMO has used the GRI framework for sustainability reporting since 2008. BMO's 2021 Sustainability Report has been prepared in accordance with the GRI Standards Core option and includes additional information in accordance with the G4 Financial Services Sector Disclosure. This GRI Index satisfies the requirements of GRI Disclosure 102-55. It specifies the GRI Standards used and the GRI Disclosures reported, with reference to other published materials where the information can be found.<sup>1</sup>

## Legend

AR – [BMO Financial Group 2021 Annual Report to Shareholders](#)

Sustainability Report – [2021 Sustainability Report and Public Accountability Statement](#)

Climate Report – [2021 Climate Report](#)

Data Pack – [2021 Sustainability Report Data Pack and Glossary](#)

SASB – [2021 SASB Disclosure](#)

PC – [Notice of Annual Meeting of Shareholders and Management Proxy Circular](#) (for the Annual Meeting held on April 13, 2022)

EENR – [2020 Employment Equity Narrative Report](#)



<sup>1</sup> This GRI Index includes and or refers to voluntary disclosures on sustainability and ESG topics, including climate-related risks and opportunities, that may not be, and are not necessary to be, incorporated into our required disclosures where we use a definition of materiality established under applicable securities laws for the purpose of complying with the disclosure rules and regulations promulgated by applicable securities regulators and applicable stock exchange listing standards.

## GRI Index

GRI Disclosure	Description	2021 Location/Commentary/Explanation for Omission
<b>GENERAL DISCLOSURES</b>		
<b>Organizational Profile</b>		
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: page 20 of the AR (About BMO) and page 207 of the AR (Note 25: Operating and Geographic Segmentation).
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. Further information: page 151 of the AR (Note 1: Basis of Presentation).
GRI 102-4	Location of operations	The topics addressed in the 2021 Sustainability Report cover our enterprise-wide operations, unless otherwise specified. Further information: page 207 of the AR (Note 25: Operating and Geographic Segmentation); and page 210 of the AR (Note 26: Significant Subsidiaries).
GRI 102-5	Ownership and legal form	Bank of Montreal is a chartered bank under the Bank Act (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 151 of the AR (Note 1: Basis of Presentation).
GRI 102-6	Markets served	We conduct our business through three operating groups: <ul style="list-style-type: none"> <li>• Personal and Commercial Banking</li> <li>• BMO Wealth Management</li> <li>• BMO Capital Markets</li> </ul> Further information: page 207 of the AR (Note 25: Operating and Geographic Segmentation).
GRI 102-7	Scale of the organization	See page 6 of the Sustainability Report (Who we are). Further information: page 20 of the AR (About BMO) and 207 of the AR (Note 25: Operating and Geographic Segmentation).
GRI 102-8	Information on employees and other workers	See page 90 of the Sustainability Report (Number of employees). Further information: EENR and page 122 of the AR (Other Statistical Information).
GRI 102-9	Supply chain	In fiscal 2021, we purchased goods and services in North America with a total cost of approximately CAD\$5.3 billion from approximately 6,828 suppliers. Of that amount, approximately CAD\$3.8 billion was spent through our Canadian operations and approximately CAD\$1.5 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 51 of the Sustainability Report (Environmental and social risk management). Further information: page 111 of the AR (Environmental and Social Risk); and page 21 of the Climate Report (Risk Management).

GRI Disclosure	Description	2021 Location/Commentary/Explanation for Omission
<b>GENERAL DISCLOSURES</b> (continued)		
<b>Organizational Profile</b> (continued)		
GRI 102-12	External initiatives	<ul style="list-style-type: none"> <li>• 30% Club</li> <li>• BlackNorth Pledge</li> <li>• Canadian Investor Statement on Climate Change</li> <li>• Canadian Investor Statement on Diversity &amp; Inclusion</li> <li>• Catalyst Accord</li> <li>• CDP</li> <li>• Climate Action 100+</li> <li>• Climate Engagement Canada</li> <li>• Cross-Sector Biodiversity Initiative</li> <li>• Equator Principles Association</li> <li>• Future Workplace Network</li> <li>• Global Network Initiative</li> <li>• Human Capital Management Coalition (U.S.)</li> <li>• Institutional Investors Group on Climate Change</li> <li>• Investor Alliance for Human Rights</li> <li>• ISO 14001 Environmental Management System</li> <li>• ISO Technical Committee 207 on Standardization in the Field of Environmental Management</li> <li>• ISO Technical Committee 322 on Standardization in the Field of Sustainable Finance</li> <li>• Leadership in Energy and Environmental Design (LEED)</li> <li>• Net Zero Asset Managers Initiative</li> <li>• Operating Principles for Impact Management</li> <li>• Partnership for Carbon Accounting Financials</li> <li>• Sustainability Accounting Standards Board (SASB) Financial Industry Advisory Group</li> <li>• Sustainable Finance Action Council</li> <li>• Task Force on Climate-related Financial Disclosures (TCFD)</li> <li>• The Learning Partnership</li> <li>• Transition Pathway Initiative</li> <li>• United Nations-convened Net-Zero Banking Alliance</li> <li>• United Nations Environment Programme – Finance Initiative</li> <li>• United Nations Global LGBTI Standards of Conduct for Business</li> <li>• United Nations Principles for Responsible Banking</li> <li>• United Nations Principles for Responsible Investing</li> <li>• United Nations Universal Declaration of Human Rights</li> <li>• United Nations Women’s Empowerment Principles</li> <li>• World Economic Forum’s SkillsLink Alliance</li> </ul>

GRI Disclosure	Description	2021 Location/Commentary/Explanation for Omission
<b>GENERAL DISCLOSURES</b> (continued)		
<b>Organizational Profile</b> (continued)		
GRI 102-13	Membership of associations	<p>BMO Financial Group is a member of the following associations. The list is not exhaustive, representing associations with annual membership dues exceeding \$50,000 paid by BMO Financial Group or BMO Harris Bank.</p> <ul style="list-style-type: none"> <li>• American Bankers Association</li> <li>• Bank Policy Institute</li> <li>• Business Council of Canada</li> <li>• Canadian Bankers Association</li> <li>• Canadian Chamber of Commerce</li> <li>• Canadian Coalition for Good Governance</li> <li>• Canadian Cyber Threat Exchange</li> <li>• Canadian Life and Health Insurance Association</li> <li>• Consumer Bankers Association</li> <li>• Council of Institutional Investors</li> <li>• Fédération des chambres de commerce du Québec</li> <li>• Finance Montreal</li> <li>• Illinois Bankers Association</li> <li>• Institute of International Bankers</li> <li>• Institute of International Finance</li> <li>• International Capital Market Association</li> <li>• International Corporate Governance Network</li> <li>• International Swaps and Derivatives Association</li> <li>• Investment Company Institute</li> <li>• Metropolitan Milwaukee Association of Commerce</li> <li>• Responsible Investment Association (Canada)</li> <li>• Risk Management Association</li> <li>• Securities Industry and Financial Markets Association</li> <li>• The Canadian Association of Financial Institutions in Insurance</li> <li>• Toronto Finance International</li> <li>• Toronto Region Board of Trade</li> <li>• U.S. Chamber of Commerce</li> <li>• Wisconsin Bankers Association</li> </ul>

GRI Disclosure	Description	2021 Location/Commentary/Explanation for Omission
<b>GENERAL DISCLOSURES</b> (continued)		
<b>Strategy</b>		
GRI 102-14	Statement from senior decision-maker	See page 3 of the Sustainability Report (Message from the CEO); page 4 of the Sustainability Report (Message from the General Counsel and Executive Committee Sponsor for Sustainability); and page 3 of the Climate Report (Message from the Chief Sustainability Officer).
GRI 102-15	Key impacts, risks, and opportunities	<p>For risks related to environmental, social and governance (ESG) practices and activities, see page 74 of the AR (Top and Emerging Risks That May Affect Future Results); page 109 of the AR (Legal and Regulatory Risk); page 111 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 13 of the Climate Report (Strategy).</p> <p>Interests of our stakeholders are disclosed on page 19 of the Sustainability Report (Engaging our stakeholders).</p> <p>Our approach to environmental and social risk management is discussed on page 51 of the Sustainability Report (Environmental and social risk management).</p> <p>Further information: Page 78 of the Sustainability Report (Human rights). <a href="#">BMO's 2021 CDP Response</a> <a href="#">BMO Statement on Human Rights</a> <a href="#">BMO Statement Against Modern Slavery and Human Trafficking</a></p>
<b>Ethics and integrity</b>		
GRI 102-16	Values, principles, standards, and norms of behaviour	<p>See page 76 of the Sustainability Report (Business conduct).</p> <p>Further information: <a href="#">BMO's Code of Conduct</a> <a href="#">BMO's Supplier Code of Conduct</a> <a href="#">BMO Statement on Human Rights</a> <a href="#">BMO Statement Against Modern Slavery and Human Trafficking</a></p>
GRI 102-17	Mechanisms for advice and concerns about ethics	See page 77 of the Sustainability Report (Business conduct – Committed to doing what's right).
<b>Governance</b>		
GRI 102-18	Governance structure	<p>Our Board's oversight of issues related to sustainability is discussed on page 74 of the Sustainability Report (Corporate governance). In addition, Board Committee charters are available on BMO's <a href="#">website</a> under Corporate Governance and Board Committees.</p> <p>Further information: page 10 of the Climate Report (Board oversight).</p>
GRI 102-19	Delegating authority	<p>The CEO has appointed BMO's General Counsel as the Executive Committee sponsor for sustainability. BMO's General Counsel reports directly to the CEO and has accountability for areas such as legal and regulatory risk, reputation risk, business conduct and ethics, and sustainability.</p> <p>BMO's Chief Sustainability Officer (CSO) reports to the General Counsel. The CSO oversees sustainability strategy and leads bank-wide initiatives on environmental and social risk, climate change strategy, investor relations focused on Environment, Social and Governance (ESG) matters, sustainability-related disclosure, operational sustainability, and sustainable finance.</p> <p>Further information: page 75 of the Sustainability Report (Sustainability governance); and page 11 of the Climate Report (Management's role).</p>

GRI Disclosure	Description	2021 Location/Commentary/Explanation for Omission
<b>GENERAL DISCLOSURES</b> (continued)		
<b>Governance</b> (continued)		
GRI 102-20	Executive-level responsibility for economic, environmental, and social topics	<p>A Sustainability Council was established in 2008, chaired by BMO's Special Advisor to the CEO on ESG matters. It is comprised of senior leaders from the lines of business and Corporate Services 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.</p> <p>An ESG Executive Forum was established in 2021, chaired by the General Counsel. It is comprised of members of the Executive Committee, including the Chief Risk Officer, Chief Financial Officer, Chief Strategy and Operations Officer, and CEO BMO Capital Markets, as well as the Special Advisor to the CEO on ESG, and the Chief Sustainability Officer. Other members of the Executive Committee may be invited as appropriate. The ESG Executive Forum discusses new developments, strategy, risk management, policy and resourcing on ESG matters and provides coordination on enterprise-wide ESG initiatives and proposals.</p> <p>Further information: page 75 of the Sustainability Report (Sustainability governance).</p>
GRI 102-21	Consulting stakeholders on economic, environmental, and social topics	<p>See page 19 of the Sustainability Report (Engaging our stakeholders).</p> <p>See our <a href="#">Shareholder Engagement Policy</a>.</p>
GRI 102-22	Composition of the highest governance body and its committees	<p>See Board of Directors on our <a href="#">website</a>.</p> <p>See Board Committees on our <a href="#">website</a>.</p> <p>Further information: pages 8-40 of the PC (About the Nominated Directors and Governance).</p>
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	<p>See our Governance and Nominating Committee Charter, Director Independence Standards and Board Diversity Policy on our <a href="#">website</a>.</p> <p>Further information: page 9 of the PC (Director profiles).</p>
GRI 102-25	Conflicts of interest	See page 18 of the PC (Business Conduct).
GRI 102-26	Role of the highest governance body in setting purposes, values, and strategy	<p>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 and approved annually in interactive sessions that challenge assumptions and strategies in the context of both the current and the potential future business environment.</p> <p>Further information: page 75 of the Sustainability Report (Sustainability governance); and page 111 of the AR (Strategic Risk).</p>
GRI 102-27	Collective knowledge of highest governance body	<p>BMO's directors are recruited and evaluated based on a skills matrix that includes experience related to sustainability. Nine of our thirteen 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.</p> <p>See page 75 of the Sustainability Report (Sustainability governance).</p> <p>Further information: page 27 of the PC (Skills Matrix); and page 9 of the Climate Report (Governance).</p>
GRI 102-28	Evaluating the highest governance body's performance	<p>The Governance and Nominating Committee of the Board of Directors is responsible for developing governance principles and guidelines for BMO, identifying and recommending candidates for election or appointment to the Board, reviewing BMO's process for orientation, and conducting an assessment of the Board, its committees and directors. This committee 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.</p> <p>Further information: Governance and Nominating Committee Charter, available on our <a href="#">website</a>.</p>
GRI 102-29	Identifying and managing economic, environmental, and social impacts	<p>The Executive Committee (EC), comprised 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.</p> <p>Further information: Executive Committee on our <a href="#">website</a>; and Other Committees on our <a href="#">website</a>.</p>

GRI Disclosure	Description	2021 Location/Commentary/Explanation for Omission
<b>GENERAL DISCLOSURES</b> (continued)		
<b>Governance</b> (continued)		
GRI 102-30	Effectiveness of risk management processes	The Risk Review Committee of the Board of Directors is responsible for assisting the Board in fulfilling its oversight responsibilities for 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 <a href="#">website</a> .  The Risk Management Committee is BMO management's senior risk committee.  Further information: page 78 of the AR (Enterprise-Wide Risk Management Framework).
GRI 102-31	Review of economic, environmental, and social topics	The Audit and Conduct Review Committee of the Board of Directors is responsible for approving BMO's Sustainability Report and Public Accountability Statement prior to disclosure; and for assessing the effectiveness of BMO's governance of sustainability issues. The committee meets at least quarterly. The Audit and Conduct Review Committee Charter is available on our <a href="#">website</a> .  Further information: page 51 of the Sustainability Report (Environmental and social risk management); page 75 of the Sustainability Report (Sustainability governance) and page 9 of the Climate Report (Governance).
GRI 102-32	Highest governance body's role in sustainability reporting	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 General Counsel to review and discuss matters related to sustainability, including climate change, as well as on an annual basis to review, discuss and approve the Sustainability Report and the Climate Report and to discuss matters related to sustainability, including climate change. In February 2022, the Sustainability Report and the Climate Report were reviewed by the full Board of Directors and approved by the Audit and Conduct Review Committee.  See page 75 of the Sustainability Report (Sustainability governance).  Further information: pages 36-37 of the PC (Audit and Conduct Review Committee); page 20 of the PC (Sustainability); and page 9 of the Climate Report (Governance).
GRI 102-33	Communicating critical concerns	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.
GRI 102-34	Nature and total number of critical concerns	Not disclosed.  Reason for omission: Confidentiality constraints.  Explanation: BMO considers this type of information confidential.
GRI 102-35	Remuneration policies	For BMO's approach to executive compensation and 2021 results and compensation, see page 41 of the PC (Compensation Discussion and Analysis).
GRI 102-36	Process for determining remuneration	For BMO's approach to executive compensation and 2021 results and compensation, see page 41 of the PC (Compensation Discussion and Analysis).
GRI 102-37	Stakeholders' involvement in remuneration	See page 49 of the PC (Independent Advice).
GRI 102-38	Annual total compensation ratio	Not disclosed.  Reason for omission: Confidentiality constraints.  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 compensation to the average full-time equivalent employee compensation.
GRI 102-39	Percentage increase in annual total compensation ratio	See above.

GRI Disclosure	Description	2021 Location/Commentary/Explanation for Omission
<b>GENERAL DISCLOSURES</b> (continued)		
<b>Stakeholder engagement</b>		
GRI 102-40	List of stakeholder groups	See page 19 of the Sustainability Report (Engaging our stakeholders).
GRI 102-41	Collective bargaining agreements	Currently, none of our employees are covered by collective bargaining agreements. For BMO's position on freedom of association and collective bargaining, refer to our <a href="#">website</a> .
GRI 102-42	Identifying and selecting stakeholders	See page 19 of the Sustainability Report (Engaging our stakeholders).
GRI 102-43	Approach to stakeholder engagement	See page 19 of the Sustainability Report (Engaging our stakeholders). For engagements undertaken specifically as part of the report preparation process, see GRI 102-46 and page 18 of the Sustainability Report (Determining our priority sustainability topics).
GRI 102-44	Key topics and concerns raised	See page 19 of the Sustainability Report (Engaging our stakeholders). For a list of priority topics, see page 18 of the Sustainability Report (Determining our priority sustainability topics).
<b>Reporting practice</b>		
GRI 102-45	Entities included in the consolidated financial statements	For information about the inter-corporate relationships among Bank of Montreal and its significant subsidiaries, see page 210 of the AR (Note 26: Significant Subsidiaries).
GRI 102-46	Defining report content and topic Boundaries	See page 18 of the Sustainability Report (Determining our priority sustainability topics).
GRI 102-47	List of material topics	See page 18 of the Sustainability Report (Determining our priority sustainability topics).
GRI 102-48	Restatements of information	The following information has been restated in the Sustainability Report: <ul style="list-style-type: none"> <li>• Indigenous banking business – the 2019 amount has been restated to include assets held in Indigenous trusts managed by BMO.</li> <li>• Voluntary turnover rate – in 2021, we updated our definition of voluntary turnover to include retirement. Results for 2019 and 2020 have been restated to reflect this change.</li> <li>• Substantiated complaints regarding breaches of customer privacy and losses of customer data – in 2021, we updated the definition of substantiated complaints to include any complaints determined to be well-founded by a privacy regulator. Results for 2019 and 2020 have been restated.</li> <li>• Sustainable finance – the 2019 and 2020 amounts have been restated to reflect new information since the previous disclosure.</li> </ul>
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 2021 Sustainability Report and PAS covers our 2021 fiscal year (November 1, 2020 to October 31, 2021).
GRI 102-51	Date of most recent report	Our most recent previous report is our 2020 Sustainability Report and PAS, published in December 2020.
GRI 102-52	Reporting cycle	Annual.
GRI 102-53	Contact point for questions regarding the report	<a href="mailto:sustainability@bmo.com">sustainability@bmo.com</a>
GRI 102-54	Claims of reporting in accordance with the GRI Standards	The Sustainability 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 pages 84-85 of the Sustainability Report (Independent Limited Assurance Report by KPMG LLP, Bank of Montreal's auditor).



## GRI Index

GRI Disclosure	Description	2021 Location/Commentary/Explanation for Omission
<b>ECONOMIC PERFORMANCE</b>		
GRI 103-1	Explanation of the material topic and its Boundary	See page 8 of the Sustainability Report (BMO's Bold Commitments). Further information: Page 5 of the AR (Chair's Message); page 7 of the AR (Chief Executive Officer's Message); page 2 of the AR (Financial Performance); and page 146 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 8 of the Sustainability Report (BMO's Bold Commitments); page 20 of the Sustainability Report (Tracking our progress – Financial strength); pages 87-95 of the Sustainability Report (BMO's Public Accountability Statements). See also <a href="#">BMO's Statement on Tax Principles</a> .
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.
GRI 201-4	Financial assistance received from government	None.
FS6	Percentage of the portfolio for business lines by specific region, size and by sector	See page 21 of the Sustainability Report (Tracking our progress – Financial inclusion – Small businesses). See page 129 of the AR (Table 9: Net Loans and Acceptances – Segmented Information)
FS7	Monetary value of products and services designed to deliver a specific social benefit for each business line broken down by purpose	See page 33 of the Sustainability Report (Number of clients receiving free or discounted services). The monetary value is not disclosed. Reason for omission: Confidentiality constraints. Explanation: BMO considers this type of information confidential.
<b>PRIORITY SUSTAINABILITY TOPICS</b>		
<b>Business conduct</b>		
GRI 103-1	Explanation of the material topic and its Boundary	See page 76 of the Sustainability Report (Business conduct). For details on the Boundary of this topic, see page 18 of this report.
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 training (ELCT) 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. In 2021, BMO employees also completed Nisitohamwin (Indigenous Perspectives) and <i>Learn from Difference for All</i> learning programs. See page 24 of the Sustainability Report (Tracking our progress – Human rights). See page 19 of the Data Pack (Human rights).

GRI Disclosure	Description	2021 Location/Commentary/Explanation for Omission
<b>PRIORITY SUSTAINABILITY TOPICS</b> (continued)		
<b>Climate change</b>		
GRI 103-1	Explanation of the material topic and its Boundary	See page 45 of the Sustainability Report (Climate change). See page 5 of the Climate Report (How climate aligns with our Purpose). For details on the Boundary of this topic, see page 18 of this report.
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 305-1	Direct (Scope 1) GHG emissions	See page 22 of the Sustainability Report (Tracking our progress – Operational efficiency); and page 47 of the Sustainability Report (Operational efficiency). See page 9 of the Data Pack (Operational efficiency). See page 28 of the Climate Report (Operational greenhouse gas emissions). See <a href="#">BMO's 2021 CDP Response</a> .
GRI 305-2	Energy indirect (Scope 2) GHG emissions	See page 22 of the Sustainability Report (Tracking our progress – Operational efficiency); and page 47 of the Sustainability Report (Operational efficiency). See page 9 of the Data Pack (Operational efficiency); and page 28 of the Climate Report (Operational greenhouse gas emissions). See <a href="#">BMO's 2021 CDP Response</a> .
GRI 305-3	Other indirect (Scope 3) GHG emissions	See page 22 of the Sustainability Report (Tracking our progress – Operational efficiency); and page 47 of the Sustainability Report (Operational efficiency). See page 9 of the Data Pack (Operational efficiency). See page 28 of the Climate Report (Operational greenhouse gas emissions). See page 29 of the Climate Report (Financed emissions). See <a href="#">BMO's 2021 CDP Response</a> .
GRI 305-4	GHG emissions intensity	See page 47 of the Sustainability Report (Operational efficiency). See page 9 of the Data Pack (Operational efficiency). See page 16 of the Climate Report (BMO's operational greenhouse gas emissions graph). See <a href="#">BMO's 2021 CDP Response</a> .
GRI 305-5	Reduction of GHG emissions	See page 22 of the Sustainability Report (Tracking our progress – Operational efficiency); and page 47 of the Sustainability Report (Operational efficiency). See page 9 of the Data Pack (Operational efficiency). See <a href="#">BMO's 2021 CDP Response</a> . See <a href="#">BMO's Environmental Policy and Approach</a> .

GRI Disclosure	Description	2021 Location/Commentary/Explanation for Omission
<b>PRIORITY SUSTAINABILITY TOPICS</b> (continued)		
<b>Community impact</b>		
GRI 103-1	Explanation of the material topic and its Boundary	See page 63 of the Sustainability Report (Community impact). For details on the Boundary of this topic, see page 18 of this report.
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 63 of the Sustainability Report (Community impact). Further information: page 27 of the Sustainability Report (Financial inclusion).
<b>Consumer protection and transparency</b>		
GRI 103-1	Explanation of the material topic and its Boundary	See page 70 of the Sustainability Report (Consumer protection and transparency). For details on the Boundary of this topic, see page 18 of this report.
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 8 the SASB disclosure (FN-AC-270a.3). Further information: Page 76 of the Sustainability Report (Business conduct); and page 70 of the Sustainability Report (Consumer protection and transparency). <a href="#">BMO Code of Conduct</a> Voluntary codes of conduct and public commitments regarding fair design and sale of financial products and services on our <a href="#">website</a> . <a href="#">What you need to know about Coercive Tied Selling</a>
<b>Corporate governance</b>		
GRI 103-1	Explanation of the material topic and its Boundary	See page 74 of the Sustainability Report (Corporate governance). For details on the Boundary of this topic, see page 18 of this report.
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 24 of the Sustainability Report (Tracking our progress – Corporate governance); page 23 of the Sustainability Report (Tracking our progress – Diversity, equity and inclusion); page 55 of the Sustainability Report (Diversity, equity and inclusion); and page 74 of the Sustainability Report (Corporate governance). See page 11 of the Data Pack (Diversity, equity and inclusion); and page 18 of the Data Pack (Corporate governance).

## GRI Index

GRI Disclosure	Description	2021 Location/Commentary/Explanation for Omission
<b>PRIORITY SUSTAINABILITY TOPICS</b> (continued)		
<b>Customer experience</b>		
GRI 103-1	Explanation of the material topic and its Boundary	See page 68 of the Sustainability Report (Community impact). For details on the Boundary of this topic, see page 18 of this report.
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		
<b>Data security</b>		
GRI 103-1	Explanation of the material topic and its Boundary	See page 72 of the Sustainability Report (Data security). For details on the Boundary of this topic, see page 18 of this report.
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 24 of the Sustainability Report (Tracking our progress – Data security).
<b>Diversity, equity and inclusion</b>		
GRI 103-1	Explanation of the material topic and its Boundary	See page 55 of the Sustainability Report (Diversity, equity and inclusion). For details on the Boundary of this topic, see page 18 of this report.
GRI 103-2	The management approach and its components	See above.
GRI 103-3	Evaluation of the management approach	See above.
See GRI 405-1		
<b>Employee experience</b>		
GRI 103-1	Explanation of the material topic and its Boundary	See page 57 of the Sustainability Report (Employee experience). For details on the Boundary of this topic, see page 18 of this report.
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 Index

GRI Disclosure	Description	2021 Location/Commentary/Explanation for Omission
<b>PRIORITY SUSTAINABILITY TOPICS</b> (continued)		
<b>Employee experience</b> (continued)		
GRI 401-1	New employee hires and employee turnover	See page 57 of the Sustainability Report (Employee experience). Total voluntary turnover rate is provided with a breakdown by region. Voluntary turnover rates are provided with breakdowns by region, age, gender, race and seniority.
GRI 401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	See page 58 of the Sustainability Report (Employee experience – Retention).
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 2021, 73,644 sick days were recorded by our employees in North America. We did not record any work-related fatalities in fiscal 2021. A breakdown of sick days and work-related fatalities by region or by gender is not disclosed. Reason for omission: Not applicable. Explanation: We do not see any differences in our male and female employee populations that would significantly affect risk of injury or illness, nor do we see any regional differences.
GRI 404-1	Average hours of training per year per employee	See page 23 of the Sustainability Report (Tracking our progress – Average learning hours per full-time equivalent employee); and page 57 of the Sustainability Report (Employee experience). See page 15 of the Data Pack (Learning and development). 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 23 of the Sustainability Report (Tracking our progress – Employees receiving regular performance reviews). See page 15 of the Data Pack (Learning and development).
<b>Environmental and social risk management</b>		
GRI 103-1	Explanation of the material topic and its Boundary	See page 51 of the Sustainability Report (Environmental and social risk management). For details on the Boundary of this topic, see page 18 of this report.
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 111 of the AR (Environmental and Social Risk); page 7 of the Data Pack (Equator Principles Reporting); and page 21 of the Climate Report (Risk Management).
FS2	Procedures for assessing and screening environmental and social risks in business lines	See above. Further information: page 111 of the AR (Environmental and Social Risk); page 50 of the Sustainability Report (Sustainable procurement); page 7 of the Data Pack (Equator Principles Reporting), and page 23 of the Climate Report (Identifying, assessing, and managing climate-related risks).

GRI Disclosure	Description	2021 Location/Commentary/Explanation for Omission
<b>PRIORITY SUSTAINABILITY TOPICS</b> (continued)		
<b>Environmental and social risk management</b> (continued)		
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.
<b>Financial inclusion</b>		
GRI 103-1	Explanation of the material topic and its Boundary	See page 27 of the Sustainability Report (Financial inclusion). For details on the Boundary of this topic, see page 18 of this report.
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 27 of the Sustainability Report (Financial inclusion).
FS14	Initiatives to improve access to financial services for disadvantaged people	See page 33 of the Sustainability Report (Financial inclusion – Customers with unique needs). 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, lowered height at our ATMs, account information and print materials in alternate formats (e.g., large print, Braille, audio or e-text statements), Telecommunications Relay Service and sign language interpreter (ASL for English and LSQ for French). Further information on our <a href="#">website</a> .
FS16	Initiatives to enhance financial literacy by type of beneficiary	See page 34 of the Sustainability Report (Financial literacy).

GRI Disclosure	Description	2021 Location/Commentary/Explanation for Omission
<b>PRIORITY SUSTAINABILITY TOPICS</b> (continued)		
<b>Human rights</b>		
GRI 103-1	Explanation of the material topic and its Boundary	See page 78 of the Sustainability Report (Human rights). For details on the Boundary of this topic, see page 18 of this report.
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		
<b>Innovation and digitalization</b>		
GRI 103-1	Explanation of the material topic and its Boundary	See page 71 of the Sustainability Report (Innovation and digitalization). For details on the Boundary of this topic, see page 18 of this report.
GRI 103-2	The management approach and its components	See above.
GRI 103-3	Evaluation of the management approach	See above.
BMO metric	Digital adoption and engagement	See page 24 of the Sustainability Report (Tracking our progress - Innovation and digitalization). See 18 of the Data Pack (Innovation and digitalization).
<b>Operational efficiency</b>		
GRI 103-1	Explanation of the material topic and its Boundary	See page 47 of the Sustainability Report (Operational efficiency). See page 16 of the Climate Report. For details on the Boundary of this topic, see page 18 of this report.
GRI 103-2	The management approach and its components	See above.
GRI 103-3	Evaluation of the management approach	See above.
GRI 302-1	Energy consumption within the organization	See page 9 of the Data Pack (Operational efficiency). See <a href="#">BMO's 2021 CDP Response</a> .
GRI 302-3	Energy intensity	See page 9 of the Data Pack (Operational efficiency). See <a href="#">BMO's 2021 CDP Response</a> .
GRI 302-4	Reduction of energy consumption	See page 47 of the Sustainability Report (Operational efficiency). See page 9 of the Data Pack (Operational efficiency). See <a href="#">BMO's 2021 CDP Response</a> .
GRI 303-1	Interactions with water as a shared resource	See page 9 of the Data Pack (Operational efficiency).

GRI Disclosure	Description	2021 Location/Commentary/Explanation for Omission
<b>PRIORITY SUSTAINABILITY TOPICS</b> (continued)		
<b>Operational efficiency</b> (continued)		
GRI 306-2	Management of significant waste-related impacts	See page 49 of the Sustainability Report (Operational efficiency – Working toward zero waste and a circular economy). See page 9 of the Data Pack (Operational efficiency).
GRI 306-3	Waste generated	See page 9 of the Data Pack (Operational efficiency).
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 related to our operations in fiscal 2021.
<b>Sustainable finance</b>		
GRI 103-1	Explanation of the material topic and its Boundary	See page 37 of the Sustainability Report (Sustainable finance). For details on the Boundary of this topic, see page 18 of this report.
GRI 103-2	The management approach and its components	See above.
GRI 103-3	Evaluation of the management approach	See above.
GRI 203-1	Infrastructure investments and services supported	BMO made \$397.6 million in community development investments in fiscal 2021 (this is included in our sustainable finance tracking on page 38 of the Sustainability Report). Community development investments are investments that promote economic development, affordable housing, revitalization/stabilization and community service activities within BMO Financial Group's U.S. footprint to meet the needs of individuals or communities with low to moderate incomes. The total monetary value of investments qualified for recognition under the terms of the Community Reinvestment Act is reported for the specified period, is stated in U.S. dollars, and is reported for the United States only.
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 in these areas. BMO's Sustainable Finance team is responsible for mobilizing sustainable finance opportunities with customers across all lines of business, and for building customer engagement and identifying market opportunities for products and services as the sustainable finance market grows. BMO's Responsible Investing team within BMO GAM helps investors understand and exercise their influence to drive climate action.  Further information: page 37 of the Sustainability Report (Sustainable finance).
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 43 of the Sustainability Report (Sustainable Finance - Responsible investing, Active ownership).
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 7 of the SASB disclosure (FN-AC-410a.3).



GRI Disclosure	Description	2021 Location/Commentary/Explanation for Omission
<b>PRIORITY SUSTAINABILITY TOPICSS</b> (continued)		
<b>Sustainable procurement</b>		
GRI 103-1	Explanation of the material topic and its Boundary	See page 50 of the Sustainability Report (Sustainable procurement). For details on the Boundary of this topic, see page 18 of this report.
GRI 103-2	The management approach and its components	See above.
GRI 103-3	Evaluation of the management approach	See above.
GRI 308-1	New suppliers that were screened using environmental criteria	We have a supplier selection process that, in applicable circumstances, includes assessment of potential new suppliers' practices related to sustainability topics.  The percentage of new suppliers that were screened is not disclosed.  Further information: page 50 of the Sustainability Report (Sustainable procurement).
<b>ADDITIONAL INFORMATION</b> (not related to the priority topics)		
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.  <b>In the United States:</b> Two political action committees connected with BMO Financial Corp. 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, 2020 to October 31, 2021, these funds contributed a total of US\$93,290 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\$91,290 and US\$2,000, respectively.  Further information: <a href="#">Statement on Political Contributions and Lobbying</a> .

BMO Priority Sustainability Topic	2021	
	Boundary	
	Internal (within BMO)	External (outside of BMO)
Table for GRI 102-47		
Business conduct	●	●
Climate change	●	●
Community impact	●	●
Consumer protection and transparency	●	●
Corporate governance	●	
Customer experience		●
Data security	●	●
Diversity, equity and inclusion	●	●
Employee experience	●	●
Environmental and social risk management	●	●
Financial inclusion	●	●
Human rights	●	●
Innovation and digitalization	●	●
Operational efficiency	●	
Sustainable finance	●	●
Sustainable procurement	●	●

Need help?

Email us at: [sustainability@bmo.com](mailto:sustainability@bmo.com)



## BMO's Sustainability Leaders Podcast

BMO's Sustainability Leaders podcast series introduces you to the innovative minds and diverse perspectives that are pushing the boundaries in sustainability good practice.

<https://sustainabilityleaders.bmo.com/en/home/sustainability-leaders-podcast/>

