
BMO Financial Group

2022 Global Reporting Initiative (GRI) Content 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 an organization to report about their significant impacts on the economy, the environment and people, including impacts on their human rights.

BMO has used the GRI framework for sustainability reporting since 2008. BMO has reported in accordance with the GRI Standards for the period November 1, 2021 to October 31, 2022. This GRI Content Index uses GRI 1: Foundation 2021 and specifies the GRI Universal Standards, Topic Standards and additional information from the G4 Financial Services Sector Disclosure to report disclosures, with reference to other published materials where the information can be found.¹

Legend

Annual Report (AR) – [BMO Financial Group 2022 Annual Report to Shareholders](#)

EENR – [2021 Employment Equity Narrative Report](#)

Climate Report – [2022 Climate Report](#)

Data Pack – [2022 Sustainability Report Data Pack and Glossary](#)

Proxy Circular (PC) – [Notice of Annual Meeting of Shareholders and Management Proxy Circular](#)

SASB – [2022 SASB Disclosure](#)

Sustainability Report – [2022 Sustainability Report and Public Accountability Statement](#)

¹ This GRI Content 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 Disclosure	Description	2022 Location/Commentary/Explanation for Omission
GRI 2: GENERAL DISCLOSURES		
The organization and its reporting practices		
2-1	Organizational details	<p>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.</p> <p>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.</p> <p>The topics addressed in the 2022 Sustainability Report cover our enterprise-wide operations, unless otherwise specified. See page 6 of the Sustainability Report (Who we are).</p> <p>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.</p> <p>Further information: page 18 of the AR (About BMO); page 146 of the AR (Note 1: Basis of Presentation); page 206 of the AR (Note 25: Operating and Geographic Segmentation); and page 208 of the AR (Note 26: Significant Subsidiaries).</p>
2-2	Entities included in the organization’s sustainability reporting	For information about the inter-corporate relationships among Bank of Montreal and its significant subsidiaries, see page 208 of the AR (Note 26: Significant Subsidiaries).
2-3	Reporting period, frequency and contact point	<p>BMO’s 2022 Sustainability Report covers our 2022 fiscal year (November 1, 2021 to October 31, 2022), similar to our financial reporting in the AR. The reporting cycle is annual.</p> <p>BMO’s 2022 Sustainability Report was published in March 2023.</p> <p>Contact sustainability@bmo.com for any questions about the report or reported information.</p>
2-4	Restatements of information	<p>The following information has been restated in the Sustainability Report:</p> <ul style="list-style-type: none"> • Employees equipped with future-focused skills – this metric has been broadened to include the range of new learning programs that were launched to target future-focused skills. • Employees enabled to learn from difference – this metric has been broadened to include the range of new learning programs that were launched to target diversity and inclusion learning. • Turnover rate metrics – the 2020 and 2021 values have been restated to reflect changes in the organization’s structure. • Women in executive officer roles – the 2021 value was restated to align with the definition used for the Annual Information Form. • Active digital users and self-serve transactions – the 2020 and 2021 values have been aggregated for North America. • Digital adoption (Canada) – the 2020 and 2021 values have been restated to align with an external benchmark.
2-5	External assurance	See page 91 of the Sustainability Report (Independent Limited Assurance Report by KPMG LLP, Bank of Montreal’s auditor).
Activities and workers		
2-6	Activities, value chain and other business relationships	<p>See page 6 of the Sustainability Report (Who we are).</p> <p>We conduct our business through three operating groups:</p> <ul style="list-style-type: none"> • Personal and Commercial Banking • BMO Wealth Management • BMO Capital Markets <p>Further information: page 18 of the AR (About BMO); and page 206 of the AR (Note 25: Operating and Geographic Segmentation).</p> <p>In fiscal 2022, we purchased goods and services in North America with a total cost of approximately \$6.4 billion from approximately 6,781 suppliers. Of that amount, approximately \$4.5 billion was spent through our Canadian operations and approximately \$1.9 billion was spent through our U.S. operations.</p>

GRI Disclosure	Description	2022 Location/Commentary/Explanation for Omission
GRI 2: GENERAL DISCLOSURES (continued)		
Activities and workers (continued)		
2-7	Employees	<p>See page 97 of the Sustainability Report (Employees and locations), for full-time and part-time employees by region, as a head count for all individuals having an employment relationship with BMO, regardless of employment type.</p> <p>See page 12 of the Data Pack (Diversity, equity and inclusion). This information includes gender breakdown and reflects full-time equivalent number of employees, comprising full-time and part-time employees and adjustments for overtime hours.</p> <p>Total number of non-guaranteed hours employees by gender and by region is not disclosed.</p> <p>Reason for omission: Confidentiality constraints.</p> <p>Explanation: BMO considers this type of information confidential.</p> <p>Further information: EENR and page 122 of the AR (Other Statistical Information).</p>
2-8	Workers who are not employees	<p>Not disclosed.</p> <p>Reason for omission: Confidentiality constraints.</p> <p>Explanation: BMO considers this type of information confidential.</p>
Governance		
2-9	Governance structure and composition	<p>Our board's oversight of issues related to sustainability is discussed on page 80 of the Sustainability Report (Corporate governance). In addition, board committee charters are available on BMO's website under Corporate Governance and Board Committees.</p> <p>See Board of Directors on our website.</p> <p>Further information: page 11 of the Climate Report (Board oversight); page 19 of the Data Pack (Corporate governance); and pages 8-40 of the PC (About the Nominated Directors and Governance).</p>
2-10	Nomination and selection of the highest governance body	<p>See our Governance and Nominating Committee Charter, Director Independence Standards and Board Diversity Policy on our website.</p> <p>Further information: page 9 of the PC (Director profiles); and page 28 of the PC (Skills matrix).</p>
2-11	Chair of the highest governance body	<p>The Chair of the Board of Directors is not a senior executive.</p>
2-12	Role of the highest governance body in overseeing the management of impacts	<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>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>The Risk Review Committee of the Board 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 Management Committee is BMO managements senior risk committee. The Risk Review Committee Charter is available on our website.</p> <p>See page 21 of the Sustainability Report (Engaging our stakeholders); page 82 of the Sustainability Report (Sustainability governance); page 11 of the Climate Report (Board oversight); and page 13 of the Climate Report (Management's role). See our Shareholder Engagement Policy.</p> <p>Further information: page 73 of the AR (Enterprise-Wide Risk Management Framework); and page 109 of the AR (Strategic Risk).</p>

GRI Disclosure	Description	2022 Location/Commentary/Explanation for Omission
GRI 2: GENERAL DISCLOSURES (continued)		
Governance (continued)		
2-13	Delegation of responsibility for managing impacts	<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 leads the Sustainability team and BMO Climate Institute. The CSO oversees sustainability strategy and leads bank-wide initiatives on environmental and social risk, climate change strategy, environment, social and governance (ESG)-focused investor relations, sustainability-related disclosure, operational sustainability and the bank’s own approach to sustainable finance with Treasury and our Sustainable Finance team.</p> <p>An ESG Executive Committee was established in 2022 (building on the previous mandate of the ESG Executive Forum), chaired by the General Counsel. It is comprised of members of the Executive Committee, including our CSO, Chief Risk Officer, Chief Financial Officer and Chief Strategy and Operations Officer, as well as the CEO of BMO Capital Markets and the Special Advisor to the CEO on ESG matters. Other members of the Executive Committee are invited as appropriate. The ESG Executive Committee discusses strategy, risk management, policies, resourcing and new developments related to ESG issues, and helps coordinate enterprise-wide ESG initiatives and proposals.</p> <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>See how we implement our commitment to the Principles for Responsible Banking (PRB) through effective governance and a culture of responsible banking in our PRB 2022 Reporting and Self-Assessment.</p> <p>Further information: page 82 of the Sustainability Report (Sustainability governance); and page 13 of the Climate Report (Management’s role).</p>
2-14	Role of the highest governance body 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 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 2023, the Sustainability Report and the Climate Report were approved by the Board’s Audit and Conduct Review Committee and provided to the full board.</p> <p>See page 82 of the Sustainability Report (Sustainability governance).</p> <p>Further information: pages 36-37 of the PC (Audit and Conduct Review Committee); page 20 of the PC (Sustainability); and page 10 of the Climate Report (Governance).</p>
2-15	Conflicts of interest	See page 18 of the PC (Business Conduct).
2-16	Communication of 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> <p>Nature and total number of critical concerns are not disclosed.</p> <p>Reason for omission: Confidentiality constraints.</p> <p>Explanation: BMO considers this type of information confidential.</p>
2-17	Collective knowledge of the highest governance body	<p>BMO’s directors are recruited and evaluated based on a skills matrix that includes understanding and experience with corporate responsibility practices and the constituents involved in sustainable development practices. 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 provided to all of BMO’s directors.</p> <p>See page 82 of the Sustainability Report (Sustainability governance).</p> <p>Further information: page 28 of the PC (Skills Matrix); and page 10 of the Climate Report (Governance).</p>

GRI Disclosure	Description	2022 Location/Commentary/Explanation for Omission
GRI 2: GENERAL DISCLOSURES (continued)		
Governance (continued)		
2-18	Evaluation of the performance of the highest governance body	The Governance and Nominating Committee of the Board 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. Further information: Governance and Nominating Committee Charter, available on our website .
2-19	Remuneration policies	For BMO's approach to executive compensation and 2022 results and compensation, see page 41 of the PC (Executive Compensation).
2-20	Process to determine remuneration	See page 49 of the PC (Independent Advice). For BMO's approach to executive compensation and 2022 results and compensation, see page 41 of the PC (Executive Compensation).
2-21	Annual total compensation ratio	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.
Strategy, policies and practices		
2-22	Statement on sustainable development strategy	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).
2-23	Policy commitments	BMO's policy commitments are available on our website , including BMO Statement on Human Rights . BMO Statement Against Modern Slavery and Human Trafficking . For our approach to risk management in our financing and lending activities, see pages 54-56 of the Sustainability Report (Environmental and social risk management). Further information: page 85 of the Sustainability Report (Human rights); page 110 of the AR (Environmental and Social Risk); and page 27 of the Climate Report (Risk Management).
2-24	Embedding policy commitments	BMO's policy commitments are available on our website . The process for embedding these commitments is disclosed in the documents. Further information: page 83 of the Sustainability Report (Business conduct); and page 85 of the Sustainability Report (Human rights).
2-25	Processes to remediate negative impacts	See BMO's Statement on Human Rights and BMO's Code of Conduct .
2-26	Mechanisms for seeking advice and raising concerns	See page 83 of the Sustainability Report (Business conduct).

GRI Disclosure	Description	2022 Location/Commentary/Explanation for Omission
GRI 2: GENERAL DISCLOSURES (continued)		
Strategy, policies and practices (continued)		
2-27	Compliance with laws and regulations	<p>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 2022.</p> <p>See page 203 of the AR (Note 24: Commitments, Guarantees, Pledged Assets, Provisions and Contingent Liabilities) that provides information regarding BMO's provisions, contingent liabilities, and legal proceedings. BMO does not disclose any totals in respect of its legal proceedings or related losses, if any.</p> <p>Reason for omission: Confidentiality constraints.</p> <p>Explanation: BMO considers this type of information confidential.</p>
2-28	Membership 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"> • American Bankers Association • Bank Policy Institute • Business Council of Canada • Canadian Bankers Association • Canadian Chamber of Commerce • Canadian Coalition for Good Governance • Canadian Cyber Threat Exchange • Consumer Bankers Association • Finance Montreal • Illinois Bankers Association • Institute of International Bankers • Institute of International Finance • International Swaps and Derivatives Association • Metropolitan Milwaukee Association of Commerce • Responsible Investment Association (Canada) • The Canadian Association of Financial Institutions in Insurance • Toronto Region Board of Trade • Wisconsin Bankers Association
Stakeholder engagement		
2-29	Approach to stakeholder engagement	See page 21 of the Sustainability Report (Engaging our stakeholders).
2-30	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 website .

GRI Disclosure	Description	2022 Location/Commentary/Explanation for Omission
ECONOMIC PERFORMANCE		
3-3	Management of material topics	See page 8 of the Sustainability Report (BMO's Bold Commitments). 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 Performance); and page 141 of the AR (Consolidated Financial Statements).
201-1	Direct economic value generated and distributed	See page 8 of the Sustainability Report (BMO's Bold Commitments for 2025); page 22 of the Sustainability Report (Tracking our progress – Economic value generated and distributed); pages 94-103 of the Sustainability Report (BMO's Public Accountability Statements). See also BMO's Statement on Tax Principles .
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 63 of the Sustainability Report (Total Rewards).
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 23 of the Sustainability Report (Tracking our progress – Financial inclusion – Small businesses). See page 126 of the AR (Table 6: 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 36 of the Sustainability Report (Number of customers receiving complimentary or discounted services). The monetary value is not disclosed. Reason for omission: Confidentiality constraints. Explanation: BMO considers this type of information confidential.
GRI 3: Material topics		
3-1	Process to determine material topics	See page 20 of the Sustainability Report (Determining our priority sustainability topics).
3-2	List of material topics	See page 20 of the Sustainability Report (Determining our priority sustainability topics). There have been no changes to the priority topics.
PRIORITY SUSTAINABILITY TOPICS		
Business conduct		
3-3	Management of material topics	See page 83 of the Sustainability Report (Business conduct).
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 2022, BMO employees also completed Ujima: Understanding the Black Experience, Nisitohamowin (Indigenous Perspectives) and Learn from Difference for All learning programs. See page 26 of the Sustainability Report (Tracking our progress – Human rights). See page 20 of the Data Pack (Human rights).
Climate change		
3-3	Management of material topics	See page 48 of the Sustainability Report (Climate change). See page 6 of the Climate Report (How our response to climate change aligns with our Purpose).
201-2	Financial implications and other risks and opportunities due to climate change	See above.

GRI Disclosure	Description	2022 Location/Commentary/Explanation for Omission
PRIORITY SUSTAINABILITY TOPICS (continued)		
Climate change (continued)		
305-1	Direct (Scope 1) GHG emissions	See page 24 of the Sustainability Report (Tracking our progress – Operational efficiency); and page 50 of the Sustainability Report (Operational efficiency). See page 9 of the Data Pack (Operational efficiency). See page 36 of the Climate Report (Operational greenhouse gas emissions). See BMO's 2022 CDP Response
305-2	Energy indirect (Scope 2) GHG emissions	See page 24 of the Sustainability Report (Tracking our progress – Operational efficiency); and page 50 of the Sustainability Report (Operational efficiency). See page 9 of the Data Pack (Operational efficiency). See page 36 of the Climate Report (Operational greenhouse gas emissions). See BMO's 2022 CDP Response .
305-3	Other indirect (Scope 3) GHG emissions	See page 24 of the Sustainability Report (Tracking our progress – Operational efficiency); and page 50 of the Sustainability Report (Operational efficiency). See page 36 of the Climate Report (Operational greenhouse gas emissions). See page 37 of the Climate Report (Financed emissions). See BMO's 2022 CDP Response .
305-4	GHG emissions intensity	See page 24 of the Sustainability Report (Operational efficiency). See page 9 of the Data Pack (Operational efficiency). See page 36 of the Climate Report (BMO's operational greenhouse gas emissions graph). See BMO's 2022 CDP Response .
305-5	Reduction of GHG emissions	See page 24 of the Sustainability Report (Tracking our progress – Operational efficiency); and page 50 of the Sustainability Report (Operational efficiency). See page 9 of the Data Pack (Operational efficiency). See BMO's 2022 CDP Response . See BMO's Environmental Policy and Approach .
Community impact		
3-3	Management of material topics	See page 67 of the Sustainability Report (Community impact).
203-2	Significant indirect economic impacts	See page 67 of the Sustainability Report (Community impact). Further information: page 29 of the Sustainability Report (Financial inclusion).

GRI Disclosure	Description	2022 Location/Commentary/Explanation for Omission
PRIORITY SUSTAINABILITY TOPICS (continued)		
Consumer protection and transparency		
3-3	Management of material topics	See page 75 of the Sustainability Report (Consumer protection and transparency).
FS15	Policies for the fair design and sale of financial products and services	See page 10 of the SASB disclosure (FN-AC-270a.3). Further information: Page 83 of the Sustainability Report (Business conduct); and page 75 of the Sustainability Report (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		
3-3	Management of material topics	See page 80 of the Sustainability Report (Corporate governance).
405-1	Diversity of governance bodies and employees	See page 26 of the Sustainability Report (Tracking our progress – Corporate governance); page 25 of the Sustainability Report (Tracking our progress – Diversity, equity and inclusion); page 59 of the Sustainability Report (Diversity, equity and inclusion); and page 80 of the Sustainability Report (Corporate governance). See page 12 of the Data Pack (Diversity, equity and inclusion); and page 19 of the Data Pack (Corporate governance).
Customer experience		
3-3	Management of material topics	See page 72 of the Sustainability Report (Customer experience).
See 2-29		
Data security		
3-3	Management of material topics	See page 77 of the Sustainability Report (Data security).
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	See page 26 of the Sustainability Report (Tracking our progress – Data security).
Diversity, equity and inclusion		
3-3	Management of material topics	See page 59 of the Sustainability Report (Diversity, equity and inclusion).
See 405-1		
Employee-centric value proposition		
3-3	Management of material topics	See page 61 of the Sustainability Report (Employee-centric value proposition).
401-1	New employee hires and employee turnover	See page 61 of the Sustainability Report (Employee-centric value proposition). See page 14 of the Data Pack (Employee-centric value proposition). 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 Disclosure	Description	2022 Location/Commentary/Explanation for Omission
PRIORITY SUSTAINABILITY TOPICS (continued)		
Employee-centric value proposition (continued)		
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	See page 61 of the Sustainability Report (Employee-centric value proposition).
403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and total number of work-related fatalities	During fiscal 2022, 90,228 sick days were recorded by our employees in North America. We did not record any work-related fatalities in fiscal 2022. 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 significant differences in our male and female employee populations that would significantly affect risk of injury or illness, nor do we see any significant regional differences.
404-1	Average hours of training per year per employee	See page 25 of the Sustainability Report (Tracking our progress – Average learning hours per full-time equivalent employee); and page 61 of the Sustainability Report (Employee-centric value proposition). See page 16 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).
404-3	Percentage of employees receiving regular performance reviews	See page 25 of the Sustainability Report (Tracking our progress – Employees receiving regular performance reviews). See page 16 of the Data Pack (Learning and development).
See 2-29		
Environmental and social risk management		
3-3	Management of material topics	See page 54 of the Sustainability Report (Environmental and social risk management).
FS1	Policies with specific environmental and social components applied to business lines	See above. Further information: page 110 of the AR (Environmental and Social Risk); page 7 of the Data Pack (Equator Principles reporting); and page 27 of the Climate Report (Risk Management).
FS2	Procedures for assessing and screening environmental and social risks in business lines	See above. Further information: page 110 of the AR (Environmental and Social Risk); page 53 of the Sustainability Report (Sustainable procurement); page 7 of the Data Pack (Equator Principles reporting), and page 29 of the Climate Report (Identifying, assessing, and managing climate-related risks).
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.

GRI Disclosure	Description	2022 Location/Commentary/Explanation for Omission
PRIORITY SUSTAINABILITY TOPICS (continued)		
Environmental and social risk management (continued)		
FS9	Coverage and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures	See above.
Financial inclusion		
3-3	Management of material topics	See page 29 of the Sustainability Report (Financial inclusion).
FS13	Access points in low-populated or economically disadvantaged areas by type	See page 29 of the Sustainability Report (Financial inclusion).
FS14	Initiatives to improve access to financial services for disadvantaged people	See page 34 of the Sustainability Report (Financial inclusion – Serving a diverse range of customers). 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 alternative 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). We are continuously looking for opportunities to enhance our products and services to better support our customers and employees with disabilities. Further information on our website .
FS16	Initiatives to enhance financial literacy by type of beneficiary	See page 37 of the Sustainability Report (Financial literacy).
Human rights		
3-3	Management of material topics	See page 85 of the Sustainability Report (Human rights).
See 412-2		
Innovation and digitalization		
3-3	Management of material topics	See page 76 of the Sustainability Report (Innovation and digitalization).
BMO metric	Digital adoption and engagement	See page 26 of the Sustainability Report (Tracking our progress – Innovation and digitalization). See page 19 of the Data Pack (Innovation and digitalization).
Operational efficiency		
3-3	Management of material topics	See page 50 of the Sustainability Report (Operational efficiency). See page 36 of the Climate Report (Operational greenhouse gas emissions).
302-1	Energy consumption within the organization	See page 9 of the Data Pack (Operational efficiency). See BMO's 2022 CDP Response .
302-3	Energy intensity	See page 9 of the Data Pack (Operational efficiency). See BMO's 2022 CDP Response .

GRI Disclosure	Description	2022 Location/Commentary/Explanation for Omission
PRIORITY SUSTAINABILITY TOPICS (continued)		
Operational efficiency (continued)		
302-4	Reduction of energy consumption	See page 50 of the Sustainability Report (Operational efficiency). See page 9 of the Data Pack (Operational efficiency). See BMO's 2022 CDP Response .
303-1	Interactions with water as a shared resource	See page 9 of the Data Pack (Operational efficiency).
306-2	Management of significant waste-related impacts	See page 52 of the Sustainability Report (Operational efficiency – Working toward zero waste and a circular economy). See page 9 of the Data Pack (Operational efficiency).
306-3	Waste generated	See page 9 of the Data Pack (Operational efficiency).
See 2-27		
Sustainable finance		
3-3	Management of material topics	See page 40 of the Sustainability Report (Sustainable finance).
203-1	Infrastructure investments and services supported	BMO made \$397.6 million in community development investments in fiscal 2022 (this is included in our sustainable finance tracking on page 41 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 <i>Community Reinvestment Act</i> 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 40 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 45 of the Sustainability Report (Sustainable Finance – 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 8 of the SASB disclosure (FN-AC-410a.3).

GRI Disclosure	Description	2022 Location/Commentary/Explanation for Omission
PRIORITY SUSTAINABILITY TOPICS (continued)		
Sustainable procurement		
3-3	Management of material topics	See page 53 of the Sustainability Report (Sustainable procurement).
308-1	New suppliers that were screened using environmental criteria	<p>Our rigorous supplier selection process involves asking questions related to the environmental and social responsibility practices in each company’s business operations. The procurement team works with our Sustainability Office to identify and monitor any exposure to environmental and social risk within BMO’s supply chain.</p> <p>The percentage of new suppliers that were screened is not disclosed.</p> <p>Further information: page 53 of the Sustainability Report (Sustainable procurement).</p>
415-1	Political contributions	<p>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.</p> <p>In the United States:</p> <p>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, 2021 to October 31, 2022, these funds contributed a total of US\$214,750 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\$211,000 and US\$3,750, respectively.</p> <p>Further information: Statement on Political Contributions and Lobbying</p>

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