

BMO Financial Group

# 2023 Global Reporting Initiative (GRI) Content Index

The **Global Reporting Initiative (GRI)** is an independent, international organization that provides standards for sustainability reporting – the GRI Sustainability Reporting Standards (GRI Standards). The GRI Standards are intended for use by organizations that are reporting on economic, environmental and social impacts.

BMO's 2023 GRI Content Index aligns with the GRI 1: Foundation 2021 and GRI Universal Standards (2021), Topic Standards (2016) and sector-specific disclosures from the G4 Financial Services Sector Disclosure (2014)<sup>1</sup> as applicable. Our reporting includes references to other published materials where the information can be found, and covers the year ended October 31, 2023. BMO has been preparing disclosures aligned with the GRI framework since 2008.<sup>2</sup>

## Legend

AR – [BMO Financial Group 2023 Annual Report to Shareholders](#)

Climate Report – [2023 Climate Report](#)

Data Pack – [2023 Sustainability Report Data Pack and Glossary](#)

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

SASB – [2023 SASB Disclosure](#)

Sustainability Report – [2023 Sustainability Report and Public Accountability Statement](#)

<sup>1</sup> We are monitoring the Sector Standards Project for Financial Services process.

<sup>2</sup> This GRI Content Index includes or refers to voluntary disclosures on sustainability topics, including climate-related risks and opportunities, that may not be, and are not necessary to be, incorporated into our required disclosures, in which 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  | 2023 Location/Commentary/Explanation for omission   |
|---|--|---|
| <b>GRI 2: GENERAL DISCLOSURES</b>                   |  |   |
| <b>The organization and its reporting practices</b> |  |   |
| 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 2023 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 22 of the AR (About BMO); page 150 of the AR (Note 1: Basis of Presentation); page 211 of the AR (Note 25: Operating and Geographic Segmentation); and page 213 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 213 of the AR (Note 26: Significant Subsidiaries).  |
| 2-3   | Reporting period, frequency and contact point                    | <p>The BMO 2023 Sustainability Report covers our 2023 fiscal year (November 1, 2022 to October 31, 2023). The reporting cycle is annual.</p> <p>The BMO 2023 Sustainability Report was published in March 2024.</p> <p>Contact <a href="mailto:sustainability@bmo.com">sustainability@bmo.com</a> 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"> <li>• Active digital users – results for this metric in 2021 and 2022 have been restated to reflect a reclassification of the data.</li> <li>• Capital directed to affordable and accessible housing – results for this metric in 2022 was restated to reflect a methodology update to ensure accurate comparison of data over time.</li> <li>• Capital to clients pursuing sustainable outcomes – results for this metric from 2019 to 2022 were restated to reflect an update to our definition of sustainable outcomes.</li> </ul>   |
| 2-5   | External assurance   | See page 93 of the Sustainability Report (Independent Limited Assurance Report by KPMG LLP, Bank of Montreal’s third-party assurance provider).   |
| <b>Activities and workers</b>                       |  |   |
| 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"> <li>• Personal and Commercial Banking</li> <li>• BMO Wealth Management</li> <li>• BMO Capital Markets</li> </ul> <p>Further information: page 22 of the AR (About BMO); and page 211 of the AR (Note 25: Operating and Geographic Segmentation).</p> <p>In fiscal 2023, we purchased goods and services in North America with a total cost of approximately \$8.74 billion from approximately 9,317 suppliers. Of that amount, approximately \$5.06 billion was spent through our Canadian operations and approximately \$3.68 billion was spent through our U.S. operations.</p>  |

| GRI Disclosure                                | Description   | 2023 Location/Commentary/Explanation for omission   |
|---|---|---|
| <b>GRI 2: GENERAL DISCLOSURES</b> (continued) |   |   |
| <b>Activities and workers</b> (continued)     |   |   |
| 2-7   | Employees   | <p>See page 99 of the Sustainability Report (Employees and locations) for breakdowns of full-time and part-time employees by region, as well as a head count for all individuals having an employment relationship with BMO, regardless of employment type.</p> <p>See page 8 of the Data Pack (Diversity, equity and inclusion). This includes a breakdown of the BMO workforce by gender and reflects the number of full-time equivalent employees, comprising full-time and part-time BMO employees with adjustments for overtime hours.</p> <p>A breakdown of the number of employees with non-guaranteed hours by gender and by region is not disclosed.</p> <p>Reason for omission: Confidentiality constraints.</p> <p>Explanation: BMO considers this type of information to be confidential.</p> <p>Further information: page 127 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 to be confidential.</p>   |
| <b>Governance</b>                             |   |   |
| 2-9   | Governance structure and composition  | <p>Our oversight of issues related to sustainability exercised by BMO's Board of Directors is discussed on page 71 of the Sustainability Report (Corporate governance). In addition, the charters of our board committee are available on our <a href="#">website</a> under Corporate Governance and Board Committees.</p> <p>See Board of Directors on our <a href="#">website</a>.</p> <p>Further information: page 11 of the Climate Report (Board oversight); page 14 of the Data Pack (Corporate governance); and pages 10-41 of the PC (About the Nominated Directors and Governance).</p>  |
| 2-10  | Nomination and selection of the highest governance body                     | <p>See the charter of our Governance and Nominating Committee, the BMO Director Independence Standards and the BMO Board Diversity Policy on our <a href="#">website</a>.</p> <p>Further information: page 10 of the PC (Director profiles); and page 29 of the PC (Skills matrix).</p>   |
| 2-11  | Chair of the highest governance body  | The Chair of the Board of Directors is not a senior executive.  |
| 2-12  | Role of the highest governance body in overseeing the management of impacts | <p>Responsibility for the oversight of sustainability is included in the mandates of our Board of Directors and its committees.</p> <p>See page 21 of the Sustainability Report (Engaging third parties); page 72 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 <a href="#">Shareholder Engagement Policy</a>.</p> <p>Further information: page 78 of the AR (Enterprise-Wide Risk Management Framework); and page 115 of the AR (Strategic Risk).</p>  |

| GRI Disclosure                                | Description   | 2023 Location/Commentary/Explanation for omission   |
|---|---|---|
| <b>GRI 2: GENERAL DISCLOSURES</b> (continued) |   |   |
| Governance (continued)                        |   |   |
| 2-13  | Delegation of responsibility for managing impacts               | <p>BMO's General Counsel, who reports to the CEO, is the Executive Committee Sponsor for Sustainability. The General Counsel is accountable for BMO's exposure to legal and regulatory risk and reputation risk, as well as our business conduct and ethics, procurement and sustainability, including climate change.</p> <p>The ESG Executive Committee chaired by the General Counsel, provides oversight and leadership for our sustainability strategy, including our Climate Ambition. The committee provides enterprise coordination that links our climate expertise, risk evaluations and commercialization strategy, enabling an agile and market-responsive approach to risks and opportunities. BMO's Chief Sustainability Officer (CSO) serves as the Secretary of this committee. In addition, BMO has a Sustainability Council, which is a leadership forum for dialogue on our sustainability efforts. Management committees and forums comprised of senior management oversee and support a coordinated enterprise-wide approach to sustainability governance. These include, but are not limited to: Disclosure Committee, Risk Management Committee, Reputation Risk Management Committee, Enterprise Regulatory Committee, Impact Investment Fund Committee, and the BMO Global Asset Management Investment Committee. Additional committees, forums and working groups are established as needed to improve our management of sustainability- and climate-related risks and opportunities and to align our approach across the enterprise.</p> <p>BMO's CSO reports to the General Counsel and leads the Sustainability Office, which includes the BMO Climate Institute. They collaborate with partners across the bank to capitalize on climate-related opportunities and manage risks. They support the General Counsel's mandate and lead sustainability and climate-related strategy development, bank-wide initiatives on environmental and social risk in partnership with Enterprise Risk and Portfolio Management and others, and the climate change commercialization strategy jointly with Corporate Strategy-Enterprise Transformation. The Sustainability Office also leads sustainability-related disclosure, operational sustainability strategy and supports Finance with its sustainability-focused investor relations, and Treasury and our Sustainable Finance teams with our approach to sustainable finance.</p> <p>Details of our performance in relation to the Principles for Responsible Banking (PRB), as well as effective governance and a culture of responsible banking can be found in our <a href="#">PRB 2023 Reporting and Self-Assessment</a>.</p> <p>Further information: page 72 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>Oversight of sustainability at the board level is embedded in the charter of the Audit and Conduct Review Committee of our Board of Directors. The committee meets regularly with the Chief Sustainability Officer and the General Counsel to review and discuss key sustainability-related issues, including climate change. In February 2024, the board's Audit and Conduct Review Committee approved our Sustainability Report and our Climate Report, which were also made available to the full board.</p> <p>See page 72 of the Sustainability Report (Sustainability governance).</p> <p>Further information: pages 37-38 of the PC (Audit and Conduct Review Committee); page 21 of the PC (Sustainability); and page 10 of the Climate Report (Governance).</p>   |
| 2-15  | Conflicts of interest   | See page 19 of the PC (Business Conduct).   |
| 2-16  | Communication of critical concerns                              | <p>Critical concerns are communicated to our 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>The 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 to be confidential.</p>   |

| GRI Disclosure                                | Description  | 2023 Location/Commentary/Explanation for omission  |
|---|--|--|
| <b>GRI 2: GENERAL DISCLOSURES</b> (continued) |  |  |
| <b>Governance</b> (continued)                 |  |  |
| 2-17  | Collective knowledge of the highest governance body          | BMO recruits and evaluates director candidates based on a skills matrix, which includes an understanding of, and experience with, sustainability. Nine of our twelve independent directors have such experience. All new and current board members receive education on sustainability topics.<br><br>See page 72 of the Sustainability Report (Sustainability governance).<br><br>Further information: page 29 of the PC (Skills Matrix); and page 10 of the Climate Report (Governance).   |
| 2-18  | Evaluation of the performance of the highest governance body | The Governance and Nominating Committee of our Board of Directors is responsible for developing governance principles and guidelines, identifying and recommending candidates for election or appointment to the board, reviewing our process for the orientation of new directors, and conducting an assessment of the board, its committees and its directors. The committee is also responsible for monitoring and evaluating our process for assessing the performance and effectiveness of the board and committees of the board (including a self-assessment of this committee), which may include the board mandate or board committee charters.<br><br>Further information: Charter of the Governance and Nominating Committee, available on our <a href="#">website</a> . |
| 2-19  | Remuneration policies  | For our approach to executive compensation at BMO, and results and compensation in fiscal 2023, see page 42 of the PC (Executive Compensation).  |
| 2-20  | Process to determine remuneration                            | See page 49 of the PC (Independent Advice).<br><br>For our approach to executive compensation at BMO, and results and compensation in fiscal 2023, see page 42 of the PC (Executive Compensation).   |
| 2-21  | Annual total compensation ratio                              | Our annual report and management proxy circular include the information from which shareholders can derive the ratio of CEO compensation to the average compensation of a full-time equivalent employee at BMO.  |
| <b>Strategy, policies and practices</b>       |  |  |
| 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 <a href="#">website</a> , including the BMO <a href="#">Statement on Human Rights</a> and the BMO <a href="#">Statement Against Modern Slavery and Human Trafficking</a> .<br><br>For our approach to risk management in our financing and lending activities, see page 73 of the Sustainability Report (Environmental and social risk management).<br><br>Further information: page 82 of the Sustainability Report (Human rights); page 116 of the AR (Environmental and Social Risk); and page 31 of the Climate Report (Risk Management).  |
| 2-24  | Embedding policy commitments                                 | BMO's policy commitments are available on our <a href="#">website</a> . The process for embedding BMO's commitments is disclosed in these documents.<br><br>Further information: page 79 of the Sustainability Report (Business conduct); and page 82 of the Sustainability Report (Human rights).   |
| 2-25  | Processes to remediate negative impacts                      | See BMO's <a href="#">Statement on Human Rights</a> and BMO's <a href="#">Code of Conduct</a> .  |

| GRI Disclosure                                | Description  | 2023 Location/Commentary/Explanation for omission   |
|---|--|---|
| <b>GRI 2: GENERAL DISCLOSURES</b> (continued) |  |   |
| Strategy, policies and practices (continued)  |  |   |
| 2-26  | Mechanisms for seeking advice and raising concerns | See page 79 of the Sustainability Report (Business conduct).  |
| 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 in relation to our business operations in fiscal 2023.</p> <p>Page 208 of the AR (Note 24: Commitments, Guarantees, Pledged Assets, Provisions and Contingent Liabilities) provides information regarding BMO's provisions, contingent liabilities and legal proceedings. BMO does not disclose total amounts in respect of legal proceedings or its related losses, if any.</p> <p>Reason for omission: Confidentiality constraints.</p> <p>Explanation: BMO considers this type of information to be confidential.</p>   |
| 2-28  | Membership associations                            | <p>BMO Financial Group is a member of the following associations.</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>• Consumer Bankers Association</li> <li>• Finance Montreal</li> <li>• Illinois Bankers Association</li> <li>• Institute of International Bankers</li> <li>• Institute of International Finance</li> <li>• International Swaps and Derivatives Association</li> <li>• Metropolitan Milwaukee Association of Commerce</li> <li>• Responsible Investment Association (Canada)</li> <li>• The Canadian Association of Financial Institutions in Insurance</li> <li>• The Clearing House</li> <li>• Toronto Region Board of Trade</li> <li>• Wisconsin Bankers Association</li> </ul> <p>The list is not exhaustive, as it includes only associations with annual membership dues of \$50,000 or more, paid by BMO Financial Group or BMO U.S.</p> |

| GRI Disclosure                                | Description   | 2023 Location/Commentary/Explanation for omission   |
|---|---|---|
| <b>GRI 2: GENERAL DISCLOSURES</b> (continued) |   |   |
| <b>Stakeholder engagement</b>                 |   |   |
| 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 <a href="#">website</a> .  |
| <b>ECONOMIC PERFORMANCE</b>                   |   |   |
| 3-3   | Management of material topics   | See page 8 of the Sustainability Report (BMO's Bold Commitments).<br>Further information: page 6 of the AR (Chair's Message); page 7 of the AR (Chief Executive Officer's Message); page 4 of the AR (Financial Performance); and page 145 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); and pages 96-106 of the Sustainability Report (Bank of Montreal 2023 Public Accountability Statement).<br>See also the BMO <a href="#">Statement on Tax Principles</a> .  |
| 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.<br>See page 62 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).<br>See page 130 of the AR (Table 5: 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 34 of the Sustainability Report (Equitable and accessible banking) and page 35 of the Sustainability Report (Number of customers receiving complimentary or discounted services). Monetary values are not disclosed.<br>Reason for omission: Confidentiality constraints.<br>Explanation: BMO considers this type of information to be confidential. |
| <b>GRI 3: Material topics</b>                 |   |   |
| 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). We have not made any major changes to our list of priority topics.   |

| GRI Disclosure                              | Description  | 2023 Location/Commentary/Explanation for omission   |
|---|--|---|
| <b>PRIORITY SUSTAINABILITY TOPICS</b>       |  |   |
| <b>Business conduct</b>                     |  |   |
| 3-3   | Management of material topics  | See page 79 of the Sustainability Report (Business conduct).  |
| 412-2                                       | Employee training on human rights policies or procedures                       | Every year, BMO employees are required to complete our Ethics, Legal and Compliance Training (ELCT) program, which includes courses on the BMO Code of Conduct, accessibility, anti-bribery, anti-corruption, and anti-money laundering measures, among others. As part of our ELCT program, employees certify adherence to the BMO Code of Conduct. In 2023, BMO employees also completed our <i>Ujima: Understanding the Black Experience</i> , <i>Nisitohtamowin (Indigenous Perspectives)</i> , <i>The Road to Allyship</i> , and <i>Learn from Difference</i> learning programs.<br>See page 82 of the Sustainability Report (Tracking our progress – Human rights).<br>See page 16 of the Data Pack (Human rights). |
| <b>Climate change</b>                       |  |   |
| 3-3   | Management of material topics  | See page 48 of the Sustainability Report (Climate change).<br>See page 16 of the Climate Report (Strategy); page 31 of the Climate Report (Risk Management); and page 41 of the Climate Report (Metrics and targets).   |
| 201-2                                       | Financial implications and other risks and opportunities due to climate change | See above.  |
| 305-1                                       | Direct (Scope 1) GHG emissions   | See page 24 of the Sustainability Report (Tracking our progress – Operational efficiency).  |
| 305-2                                       | Indirect (Scope 2) GHG emissions   | See page 6 of the Data Pack (Operational efficiency).   |
| 305-3                                       | Other indirect (Scope 3) GHG emissions   | See page 43 of the Climate Report (Operational greenhouse gas emissions).   |
| 305-4                                       | GHG emissions intensity  | See the BMO <a href="#">2023 CDP Response</a> .   |
| 305-5                                       | Reduction of GHG emissions   |   |
| <b>Community impact</b>                     |  |   |
| 3-3   | Management of material topics  | See page 66 of the Sustainability Report (Community impact).  |
| 203-2                                       | Significant indirect economic impacts  | See page 66 of the Sustainability Report (Community impact).<br>Further information: page 29 of the Sustainability Report (Financial inclusion).  |
| <b>Consumer protection and transparency</b> |  |   |
| 3-3   | Management of material topics  | See page 87 of the Sustainability Report (Consumer protection and transparency).  |
| FS15  | Policies for the fair design and sale of financial products and services       | See page 11 of the SASB disclosure (FN-AC-270a.3).<br>Further information: page 79 of the Sustainability Report (Business conduct); and page 87 of the Sustainability Report (Consumer protection and transparency).<br>BMO <a href="#">Code of Conduct</a> .<br>Voluntary codes of conduct and public commitments regarding the fair design and sale of financial products and services, available on our <a href="#">website</a> .<br>What you need to know about <a href="#">Coercive Tied Selling</a> .   |



| GRI Disclosure                                    | Description   | 2023 Location/Commentary/Explanation for omission   |
|---|---|---|
| <b>PRIORITY SUSTAINABILITY TOPICS</b> (continued) |   |   |
| <b>Corporate governance</b>                       |   |   |
| 3-3   | Management of material topics   | See page 71 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 57 of the Sustainability Report (Diversity, equity and inclusion); and page 71 of the Sustainability Report (Corporate governance).<br>See page 8 of the Data Pack (Diversity, equity and inclusion); and page 14 of the Data Pack (Corporate governance).  |
| <b>Customer experience</b>                        |   |   |
| 3-3   | Management of material topics   | See page 84 of the Sustainability Report (Customer experience).   |
| <b>Data security</b>                              |   |   |
| 3-3   | Management of material topics   | See page 76 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).   |
| <b>Diversity, equity and inclusion</b>            |   |   |
| 3-3   | Management of material topics   | See page 57 of the Sustainability Report (Diversity, equity and inclusion).   |
| 405-1   | Diversity of governance bodies and employees  | See above.  |
| <b>Our employee value proposition</b>             |   |   |
| 3-3   | Management of material topics   | See page 60 of the Sustainability Report (Our employee value proposition).  |
| 401-1   | New employee hires and employee turnover  | See page 60 of the Sustainability Report (Our employee value proposition).<br>See page 10 of the Data Pack (Our employee value proposition). Total turnover rate is provided with a breakdown by region. Voluntary turnover rates are provided with breakdowns by age, gender, race and seniority.  |
| 401-2   | Benefits provided to full-time employees that are not provided to temporary or part-time employees                                  | See page 60 of the Sustainability Report (Our employee 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 2023, BMO employees in North America recorded 107,554 sick days.<br>We did not record any work-related fatalities in fiscal 2023.<br>A breakdown of sick days and work-related fatalities by region or by gender is not disclosed.<br>Reason for omission: Not applicable.<br>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. |

| GRI Disclosure                                    | Description  | 2023 Location/Commentary/Explanation for omission  |
|---|--|--|
| <b>PRIORITY SUSTAINABILITY TOPICS</b> (continued) |  |  |
| <b>Employee value proposition</b> (continued)     |  |  |
| 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 60 of the Sustainability Report (Our employee value proposition).<br>See page 12 of the Data Pack (Learning and skills development).<br>A breakdown of average hours of training by gender or by employee category is not disclosed.<br>Reason for omission: Not applicable (training by gender).<br>Explanation: Investments in training are made across BMO's workforce (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 who received annual performance reviews).<br>See page 12 of the Data Pack (Learning and skills development).   |
| <b>Environmental and social risk management</b>   |  |  |
| 3-3   | Management of material topics  | See page 73 of the Sustainability Report (Environmental and social risk management).   |
| FS1   | Policies with specific environmental and social components applied to business lines   | See above.<br>Further information: page 116 of the AR (Environmental and Social Risk); page 14 of the Data Pack (Equator Principles reporting); and page 31 of the Climate Report (Risk Management).   |
| FS2   | Procedures for assessing and screening environmental and social risks in business lines  | See above.<br>Further information: page 116 of the AR (Environmental and Social Risk); page 54 of the Sustainability Report (Sustainable procurement); page 14 of the Data Pack (Equator Principles reporting); and page 38 of the Climate Report (Engaging with clients on climate transition readiness).   |
| 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.   |

| GRI Disclosure                                    | Description  | 2023 Location/Commentary/Explanation for omission   |
|---|--|---|
| <b>PRIORITY SUSTAINABILITY TOPICS</b> (continued) |  |   |
| <b>Financial inclusion</b>                        |  |   |
| 3-3   | Management of material topics  | 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 – Equitable and accessible banking).<br>We are committed to developing specialized BMO products and services that make our offerings more accessible and to making our facilities and services accessible for everyone. Initiatives include level or ramped entries to our branches, lowered height at our ATMs, account information and printed materials in alternative formats (e.g., large print, braille, audio or e-text statements), Telecommunications Relay Service and sign language interpretation (ASL for English and LSQ for French). We continually look for opportunities to enhance our products and services in order to better support our customers and employees living with disabilities.<br>Further information: see our <a href="#">website</a> . |
| FS16  | Initiatives to enhance financial literacy by type of beneficiary             | See page 36 of the Sustainability Report (Financial literacy).  |
| <b>Human rights</b>                               |  |   |
| 3-3   | Management of material topics  | See page 82 of the Sustainability Report (Human rights).  |
| 412-2   | Employee training on human rights policies or procedures                     | See above.  |
| <b>Innovation and digitalization</b>              |  |   |
| 3-3   | Management of material topics  | See page 88 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).<br>See page 17 of the Data Pack (Innovation and digitalization).  |
| <b>Operational efficiency</b>                     |  |   |
| 3-3   | Management of material topics  | See page 51 of the Sustainability Report (Operational efficiency).<br>See page 43 of the Climate Report (Operational greenhouse gas emissions).   |
| 302-1   | Energy consumption within the organization                                   | See page 6 of the Data Pack (Operational efficiency).<br>See the BMO <a href="#">2023 CDP Response</a> .  |
| 302-3   | Energy intensity   | See page 6 of the Data Pack (Operational efficiency).<br>See the BMO <a href="#">2023 CDP Response</a> .  |
| 302-4   | Reduction of energy consumption  | See page 51 of the Sustainability Report (Operational efficiency).<br>See page 6 of the Data Pack (Operational efficiency).<br>See the BMO <a href="#">2023 CDP Response</a> .  |

| GRI Disclosure                                    | Description   | 2023 Location/Commentary/Explanation for omission  |
|---|---|--|
| <b>PRIORITY SUSTAINABILITY TOPICS</b> (continued) |   |  |
| <b>Operational efficiency</b> (continued)         |   |  |
| 303-1   | Interactions with water as a shared resource  | See page 6 of the Data Pack (Operational efficiency).  |
| 306-2   | Management of significant waste-related impacts   | See page 53 of the Sustainability Report (Operational efficiency – Working toward zero waste and a circular economy).<br>See page 6 of the Data Pack (Operational efficiency).   |
| 306-3   | Waste generated   | See page 6 of the Data Pack (Operational efficiency).  |
| <b>Sustainable finance</b>                        |   |  |
| 3-3   | Management of material topics   | See page 39 of the Sustainability Report (Sustainable finance).  |
| 203-1   | Infrastructure investments and services supported   | BMO directed funding of \$500.3 million to investments in community development in fiscal 2023 (this information is included in our sustainable finance tracking on page 40 of the Sustainability Report). Investments in community development are investments that promote economic development, affordable housing, revitalization/stabilization and community service activities within the U.S. footprint of BMO Financial Group in order 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 our exposure to social and environmental risks, and to take advantage of opportunities in these areas. The BMO Sustainable Finance team is responsible for mobilizing sustainable finance opportunities with our customers across all lines of business, and for building customer engagement and identifying market-related opportunities for products and services as the sustainable finance market grows. Within BMO BMO Global Asset Management, our Responsible Investing team helps investors understand and exercise their influence to drive climate action.<br><br>Further information: page 39 of the Sustainability Report (Sustainable finance) and page 54 of the Sustainability Report (Sustainable procurement). |
| 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 investee companies we engaged with, and the number of board-level meetings with those companies. However, we do not disclose those numbers as percentages of the total number of our investee companies.<br><br>See page 45 of the Sustainability Report (Sustainable finance – Responsible investing).  |
| FS12  | Voting policy(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 9 of the SASB disclosure (FN-AC-410a.3).  |

| GRI Disclosure                                    | Description   | 2023 Location/Commentary/Explanation for omission   |
|---|---|---|
| <b>PRIORITY SUSTAINABILITY TOPICS</b> (continued) |   |   |
| Sustainable procurement                           |   |   |
| 3-3   | Management of material topics                                 | See page 54 of the Sustainability Report (Sustainable procurement).   |
| 308-1   | New suppliers that were screened using environmental criteria | <p>Our rigorous supplier selection process involves questions related to the environmental and social responsibility practices in a company’s business operations. The BMO Procurement team works with our Sustainability Office to identify and monitor any exposures to environmental and social risk within our supply chain.</p> <p>The percentage of new suppliers that were screened is not disclosed.</p> <p>Reason for omission: Confidentiality constraints.</p> <p>Explanation: BMO considers this type of information to be confidential.</p> <p>Further information: page 54 of the Sustainability Report (Sustainable procurement).</p>  |
| 415-1   | Political contributions                                       | <p>At BMO, we support efforts to enhance the transparency of the electoral systems in the jurisdictions in which we do business. We do not use BMO 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 year ended October 31, 2023, these funds contributed a total of US\$179,000 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\$175,500 and US\$3,500, respectively.</p> <p>Further information: <a href="#">Statement on Political Contributions and Lobbying</a>.</p> |

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## 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/>

