

# BMO's Statement against Modern Slavery and Human Trafficking

The Bank of Montreal ("BMO") (we, us, our) is committed to respecting human rights and stands against all forms of "modern slavery" (a term that includes slavery, servitude, forced or compulsory labour, human trafficking or child labour). BMO's Statement Against Modern Slavery and Human Trafficking (the "Statement") is issued pursuant to section 54 of the United Kingdom Modern Slavery Act 2015 (the "UK Act"), Part 2 of the Australian Modern Slavery Act 2018 (the "Australian Act") and with regards to Section 11 of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, for the financial year ending 31st October 2025. This Statement is on behalf of BMO Capital Markets Limited (ARBN 110 552 513), which is subject to the reporting requirements under the UK Act and the Australian Act by virtue of its consolidated revenue, that meets the statutory threshold and its operations in Australia via its representative office in Melbourne.

This Statement describes elements of our human rights program for our 2025 fiscal year, which incorporates good practices, like those embodied by the United Nations Guiding Principles on Business and Human Rights ("UNGP"). More information about our approach to human rights and sustainability is found in our Statement on Human Rights and our 2025 Sustainability and Climate Reporting and Public Accountability Statement available at <https://our-impact.bmo.com/reports/>.

## Our structure, business, and supply chains

BMO is a highly diversified financial services provider headquartered in Canada with approximately 53,000 employees and total assets of \$1.5 trillion. BMO provides a broad range of personal and commercial banking, wealth management, global markets and investment banking products and services to 13 million clients in Canada, the United States and select markets globally. We operate through four integrated operating segments: Canadian Personal and Commercial Banking, U.S. Banking, Wealth Management and Capital Markets.

Driven by a single purpose, to Boldly Grow the Good in business and life, BMO is committed to driving positive change in the world, and making progress for a thriving economy, sustainable future, and stronger communities.

Capital Markets offers a complete range of financial products and services to corporate, institutional and government clients. BMO Capital Markets employs approximately 2,700 professionals in 30 locations around the world. Capital Market's lines of business include Investment and Corporate Banking, as well as Global Markets. BMO Capital Markets operates in continental Europe through Bank of Montreal Europe PLC, and in the UK through the London Branch of BMO and BMO Capital Markets Limited (a UK broker-dealer and direct subsidiary of BMO). BMO Capital Markets Limited also carries out business in Australia through a representative office located in Melbourne, providing both Investment Banking and Securities Lending services to wholesale clients.

"Third-Party" is defined as any entity with whom BMO enters, or has entered, into a business or strategic relationship, by contract or otherwise, to provide products and/or services to BMO and/or its customers. This applies to all relationships with an individual or entity who is not a customer or employee of BMO including intercompany relationships.

In the 2025 fiscal year, BMO purchased goods and services in North America at a total cost of approximately CAD\$8.4 billion from approximately 7,301 Third Parties.

## UK Operations

Our London Office provides both Investment & Corporate Banking and Global Markets services. It employs or contracts approximately 398 full time, contingent and part time staff covering both client-facing banking roles and corporate support roles (including finance, operations, human resources, legal, risk management and compliance). The UK office is located at: 6th Floor, 100 Liverpool Street, London, EC2M 2AT. During the 2025 fiscal year, our UK operations included the purchase of goods and services at a total cost of approximately £52,540,483.

## Australian Operations

The Capital Markets Australian representative office consists of 10 full time banking staff split between Investment Banking and Securities Lending services, as well as one full time IT support staff. All staff earn above the statutory minimum wage. We conduct an annual benchmarking exercise to help ensure employee pay remains competitive to the market. The Australian Office is located at: 140 William Street, Level 33, Melbourne, VIC, 3000, Australia. Our Melbourne office predominantly relies on the provision of goods and services from a number of internal and external Third Parties, including, but not limited to, cleaning, telecommunications, payroll, financial reporting and regulatory reporting. With the exception of on-site and local services, the vast majority of Third-Party service providers to our Australian Office are engaged via BMO on a global level.

## Modern slavery risks in our operations and supply chains

The following includes steps taken during our 2025 financial year to prevent and reduce modern slavery risks in our business and supply chains.

While BMO receives a limited number of services from countries designated by the Global Slavery Index as having an increased prevalence of modern slavery, we consider the overall risk that our business and supply chains have utilized, caused or contributed to modern slavery to be low. The contributing factors to our low risk assessment are (i) the fact that the majority of our workforce consists of skilled and experienced individuals, and (ii) our robust global codes, policies, directives, programs and procedures, which are described herein.

However, there remains a risk that our operations may be indirectly linked to modern slavery as a result of our business activities. Other risks of modern slavery may exist in the outer tiers of our supply chain supporting the provision of certain product categories, such as the possible use of conflict minerals used in technology hardware and electronics; the potential for modern slavery presence in the production of timber and steel used in office furniture or textiles used in uniforms. In addition, there are potential risks of modern slavery such as debt bondage and deceptive recruiting for sub-contracted labour which supports services provided by Third-Party providers such as cleaning, property maintenance, security, food services, transport, courier services and accommodation. The risk of modern slavery is potentially higher in these industries and may be further increased in countries with a higher prevalence of modern slavery.

## Actions taken to assess and address modern slavery risks

BMO and its subsidiaries adopt and implement the same codes, policies, directives, programs, standards and procedures in all jurisdictions in which we operate, and therefore we have provided a single, consolidated description of actions taken to globally assess and address modern slavery risks in this Part 3.

## Our standards, policies, and codes of conduct relating to modern slavery

Our Corporate Policies and Standards apply globally (and BMO subsidiaries are required to comply with them to the extent they are applicable to their business operations) and outline frameworks and objectives to appropriately identify, assess, manage, monitor and report on our exposure to material risks. Our Corporate Policy and Standard development process is initiated with an assessment that identifies the principles with which the Board of Directors and/or senior management provide oversight over material risks and risk management frameworks. BMO requires Policies and Standards to be assessed at least every two years and updated as necessary. Internal stakeholders provide input during the policy development and update process, as well as when developing supporting documents such as guidelines and directives. In this section, we describe some of the relevant Corporate Policies and Standards that help mitigate, assess and address risks of modern slavery at BMO.

BMO's Human Resources Management Corporate Policy and our recruitment and inclusion guidelines reflect our commitment to ensure that all policies, procedures, programs and practices comply with regulatory and legal requirements in the jurisdictions that we operate in, and formalize our commitment to non-discrimination and equality of opportunity.

BMO's Environmental and Social ("E&S") Risk Corporate Policy came into effect in May 2022, and was updated in November 2024 (the "E&S Risk Policy"). The E&S Risk Policy serves as the foundation for BMO's integration of E&S risk considerations into our existing Enterprise Risk Management Framework ("ERMF"). The E&S Risk Policy defines E&S risk with reference to multiple factors that may give rise to E&S risks, including human rights; talent & inclusion practices; labour standards; and Indigenous Peoples rights. A second-line E&S Risk Management Framework Directive supports the E&S Risk Policy by providing greater clarity and detail regarding the management of E&S risk. The E&S Risk Policy applies to all employees of BMO and its subsidiaries globally. All employees, through their individual roles and responsibilities, contribute to effective management of E&S risk.

BMO's Code of Conduct (the "Code") is our guide for ethical conduct and responsible decision-making. It applies to everyone that works at BMO as well as members of the Boards of Directors of BMO and subsidiaries globally. We do not grant or approve waivers to our Code. Grounded in our values of integrity, empathy, inclusion, and responsibility, the Code calls on us to consider how our business decisions affect others, including our customers, employees, partners, and the communities where we operate. It encourages us to speak up and do what's right, even when we face difficult choices. All employees participate in annual Code training and every officer, employee and director confirms they have read, understood, complied with, and will continue to comply with the Code.

Our Supplier Code of Conduct (the "Supplier Code") outlines the principles our Third Parties are required to follow and support – our standards for integrity, fair dealing and sustainability. Third Parties must comply with the applicable laws and regulations in the jurisdictions in which they operate, including those pertaining to employment standards, labour (for example, those pertaining to wages and hours of work, or the right to join a union), human rights and non-discrimination, workplace health and safety, human trafficking, and child labour. In jurisdictions where employment standards and laws do not address discrimination or human rights, the Supplier Code requires Third Parties to (i) adopt policies and/or codes of conduct that consider the UNGP and (ii) implement similar policies and/or codes of conduct of their own suppliers and subcontractors. We require Third Parties to identify, mitigate and seek to eliminate modern slavery risks in their business or supply chain. Third Parties must report to BMO (through their BMO Supplier Manager), upon request, on any modern slavery risks identified and any actions taken in respect of such risks in any locations in which they or their subcontractors operate. Such reporting obligations support BMO's own transparency, monitoring and compliance with applicable regulations regarding modern slavery on a global scale. In support of the Supplier Code, all of BMO's procurement agreements require a Third-Party to make representations that it is aware, understands, and will comply with the principles of the Supplier Code. At higher levels of risk, additional contractual provisions, warranties and representations will be required of a Third-Party to address the higher potential for modern slavery risks.

BMO has an established Anti-Money Laundering ("AML") Program comprised of policies, procedures, and risk assessments on AML, anti-terrorist financing, and sanctions measures. The AML Program is designed to prevent the use of BMO's financial products and services for the purpose of money laundering, terrorist financing or sanctioned activity. Among other risks, the AML Program seeks to identify the risks associated with modern slavery.

Our Third-Party Risk Management ("TPRM") Directive and corresponding TPRM Operating Program Handbook outline our framework of structures, systems, processes and controls, and technology which we use to engage and manage risks associated with Third Parties throughout the Third-Party Lifecycle. This is the overarching program BMO uses for TPRM which relies on our line of business Supplier Managers to reasonably ensure our Third Parties are adhering to the Supplier Code. The TPRM Program Operating Handbook serves as a manual to understand BMO's TPRM Program to ensure all activities are consistently executed upon the requirements of the TPRM Directive and are further supported by a TPRM training program.

Our Procurement Directive sets out requirements that protect BMO's interests in the acquisition of products and/or services. Its objective is to drive a sustainable competitive advantage in adherence with our Procurement Ethics Guidelines which includes ethical sourcing. The Procurement Directive also sets out Third Party guidance on Sustainable Procurement expectations aligned with the Supplier Code.

## Risk Assessment and Management

### i. Employees

We comply with employment standards and human rights legislation in the jurisdictions in which BMO operates. Our hiring and recruitment procedures comply with applicable legislation to ensure fairness in our approach to hiring.

We value and actively support a workplace culture that embraces individual differences, ensures fairness, and upholds human rights. In particular we:

- recognize gender equality as a fundamental human right;
- support the right to freedom of association and collective bargaining (see BMO Statement on Freedom of Association and Collective Bargaining);
- stand against modern slavery; and
- stand against discrimination in all parts of the employment life cycle, including discrimination on the grounds of ethnicity, race, disability, gender, identity or sexual orientation.

Moreover, we are committed to ensuring equitable access to opportunities and fostering growth for groups currently facing social and economic challenges to inclusion.

We are committed to workplace inclusion, which is one of our core corporate values. We strive to create an environment where all our people can succeed, supporting individual needs by:

- providing an accessible workplace for employees with disabilities with workplace accommodations, technical devices or additional support to succeed at work; and
- making available the tools and resources to assist every employee to contribute to their full potential.

To support our commitment to inclusion, BMO has operating procedures that aim to create a safe workplace for all. These include, but are not limited to, programs regarding health and safety, anti-harassment, bullying and victimization at work, resolution programs and grievance procedures, workplace violence, employee protection plans, drug-free workplace programs, drug and alcohol guidelines, and flexible work arrangements. We also have a Speak Up! whistleblower reporting service (see further details in Part 3(c) below) for anyone inside or outside of BMO to report suspected misconduct about BMO or one of our Third Parties. BMO does not tolerate retaliation against anyone who speaks up to report suspected misconduct.

## ii. Third Parties

The TPRM framework defines how the enterprise governs, identifies, measures, mitigates, monitors, and reports Third-Party risks. As required by the TPRM framework, due diligence is conducted before entering into an arrangement with a new Third-Party, as well as ongoing due diligence with existing Third Parties to ensure they remain compliant with BMO's policies.

We are committed to identifying, mitigating, and addressing the risks of modern slavery within our supply chain. As part of our broader approach to supply chain diversification and responsible sourcing, we conduct ongoing due diligence on human rights matters, including modern slavery. We have embedded continuous monitoring processes to detect and respond to potential modern slavery violations across our Third-Party base. These processes include the use of third-party risk screening tools, Third Party self-assessments, and targeted, risk-based reviews. Our monitoring efforts are designed to surface emerging risks, particularly in industries and geographies with a higher prevalence of modern slavery, while also monitoring over 500 suppliers representing over 85% of our total annual spend through a third-party supplier monitoring tool. To ensure accountability and transparency, we report the outcomes of our monitoring activities both annually and quarterly to internal risk stakeholders. This enables focused attention on the most salient modern slavery risks and supports informed decision-making to strengthen our ethical sourcing practices. To expand our E&S supplier monitoring program we recently onboarded an additional tool, expanding the number of suppliers that will be monitored on an ongoing basis.

## iii. Customers

As a financial services provider with customers in multiple jurisdictions, we recognize the risks associated with transactions that may be related to modern slavery. To address these risks, we have incorporated specific processes into our AML Program to identify risks of modern slavery. Risks are evaluated on various factors, including customer type, geography, industries and products. High-risk customers are subject to enhanced due diligence as per our AML Program.

Our AML Program seeks to identify and verify customer information, monitor customer transactions for unusual activity, and report suspicious activity to the relevant authorities in an effort to identify criminal activities, including threats associated with human trafficking, that may be linked to money laundering, terrorist financing, or financial or trade sanctions.

Since 2016, BMO has participated in Project Protect, the first ever public-private partnership led by the Financial Transactions and Report Analysis Centre of Canada ("FINTRAC"), which is focused on the money laundering aspect of human trafficking by identifying trends related to transactional activity consistent with human trafficking to help banks report suspicious activity to FINTRAC.

In 2019, BMO joined a coalition of banks and survivor organizations to participate in Finance Against Slavery and Trafficking ("FAST") a United Nations initiative. FAST aims to provide financial institutions, service providers, regulators, government agencies and other stakeholders around the world with a framework to match identified survivors to basic financial services. As part of BMO's commitments with these efforts, BMO maintains formal partnerships with several agencies and organizations across North America to help survivors of human trafficking open bank accounts and access essential financial services. As of July 2024, FAST transitioned to the United Nations Development Program ("UNDP"), marking the evolution of the initiative beyond its pilot phase. The UNDP now provides resources to financial service providers and survivor support organizations to independently implement Survivor Inclusion Initiative practices.

BMO continues to support survivors of human trafficking by maintaining strong partnerships with existing organizations and actively seeking new collaborations to expand access to essential financial services for survivors of human trafficking. For example, BMO expanded its collaboration with foundations supporting survivors of human trafficking by establishing new partnerships with organizations in California as part of BMO's acquisition of Bank of the West in 2023. These efforts reflect BMO's longstanding commitment to financial inclusion and firm stance against human trafficking in all forms.

BMO assesses and manages the E&S risks associated with its lending transactions, including human rights matters related to any such transactions where applicable, for example the health and safety of communities, Indigenous rights, workers' rights and community relations. Our Enterprise and Credit Risk Management Frameworks outline our relevant governance structures, including enhanced due diligence policies and processes. We address E&S risk in our lending processes through our Environmental and Social Risk General Financing Guideline, which outlines the bank's Risk Appetite with respect to E&S risk, and helps us identify, assess and manage these risks in the context of wholesale lending. Transactions involving significant environmental or social concerns may be escalated to our Reputation Risk Management Committee for consideration.

## Mechanisms to Report Concerns and Complaints

One of the five commitments in BMO's Code is Speak Up!. We offer a number of channels through which our employees can ask questions, provide feedback and report concerns without fear of retaliation – Employee Relations, Global Investigations, the Ethics Office and our Speak Up! Whistleblower reporting service, among others. There are several internal speak up resources that set out the process, accountabilities and contact details for our reporting channels, as well as BMO's commitment to protect employees from retaliation.

BMO's Ethics Office oversees our Whistleblower channel, which is open to anyone, whether or not they are BMO employees, to report suspicion of misconduct involving BMO or one of our Third Parties. Concerns can be communicated directly to our Ethics Office by email or submitted through our Speak Up! Whistleblower reporting service. The service is operated by an independent company to facilitate secure, confidential and anonymous reporting, 24/7, in multiple languages. Additional information about the service is available in multiple places internally and on our public website, including in the Code, Supplier Code and whistleblower information page: [www.bmo.com/main/about-bmo/corporate-governance/bmo-whistleblower-hotline/](http://www.bmo.com/main/about-bmo/corporate-governance/bmo-whistleblower-hotline/).

Strong ethics and conduct scores in our employee engagement survey highlight employees' confidence that concerns can be safely reported and that BMO will take action as required. This is also demonstrated by the steady number of reports we receive through our Whistleblower channel. Each allegation is reviewed, and if it is confirmed, we take appropriate action, ranging from mandatory coaching sessions to termination. If an allegation is not confirmed, we look for opportunities to reiterate our expectations for ethical conduct or improve our policies and processes.

BMO does not tolerate retaliation against anyone who reports a concern, supports an employee to report a concern, or participates in an investigation. We take a number of steps to protect employees from retaliation, including ongoing training and communications to help managers and employees recognize, avoid and report suspected retaliation.

Stakeholders can also contact BMO to discuss their questions, feedback or concerns through a variety of channels, including the CEO's Office, Investor Relations, Sustainability, Ethics and Corporate Secretary. More information can be accessed here: [www.bmo.com/home/about/banking/corporate-governance/](http://www.bmo.com/home/about/banking/corporate-governance/).

## Measures Taken to Remediate any Modern Slavery

In our 2025 fiscal year, BMO did not identify any occurrences of modern slavery in BMO's business or BMO's supply chains. Consequently, BMO did not take any measures to remediate any adverse impacts of modern slavery nor did it take any measures to remediate the loss of income to families that potentially could have resulted from any measure taken to eliminate the use of modern slavery in BMO's business and BMO's supply chains.

## Training and Awareness

Every year, all BMO employees must complete our Ethics, Legal and Compliance Training ("ELCT"), which covers a range of topics including the Code, Speaking Up, Information Security, AML and Anti-Corruption. The Code training course has a completion rate of over 99%<sup>1</sup> and includes a declaration where employees confirm they will continue to comply with the Code and applicable policies and acknowledge their responsibility for speaking up about potential misconduct and never retaliating against anyone for speaking up. Our Anti-Corruption and Anti-Competition and AML training courses also have completion rates of over 99%.<sup>1</sup> These courses help ensure that everyone is aware of these critical risks and ways to manage and mitigate them. We reinforce this training with ongoing communication to help ensure there is a shared understanding of our collective responsibility to do what's right, and to speak up candidly when we have questions or concerns.

BMO also makes available a stand-alone e-learning course on human trafficking and the associated red flags, designed to help employees identify and escalate potential activity related to human trafficking, including those involving forced labour and sexual exploitation. The training provides comprehensive information on known indicators and typologies of human trafficking, drawing on guidance from regulatory and law enforcement sources. BMO has also established ongoing staff training on human trafficking patterns.

To promote consistency across TPRM activities, BMO offers training sessions and publishes resources for the broader TPRM community. In addition, employees who manage or oversee Third-Party relationships complete annual training. This training is designed to ensure a clear understanding of the principles of BMO's TPRM, the roles and accountabilities within the TPRM framework, and the core stages of the Third-Party lifecycle and related activities.

## Assessing the effectiveness of our actions

As noted in our Statement on Human Rights, we commit to tracking progress and performance, and providing transparency and disclosure. Responsibility for human rights is shared across BMO. We seek to assess the effectiveness of our actions by:

- continued Third-Party screening and an enhanced due diligence process for major and high-risk Third Parties on E&S risk, including on the topic of modern slavery;
- ongoing monitoring of unusual activity reports submitted for internal review relating to modern slavery claims made via our reporting channels, including any suspicious transaction reporting required under applicable AML legislation and in support of Project Protect (see further details in Part 2(b) above);
- reporting internally in our social monitoring program including annual and quarterly reporting cycles, and ongoing monitoring of Third Parties, to help ensure alignment with our ethical standards and support continuous improvement in identifying and mitigating modern slavery risks;
- as it relates to our SpeakUp! process, conducting assessments, peer benchmarking and comparisons with current industry practices; an annual external audit focused on BMO's Sarbanes-Oxley controls related to our Code of Conduct and whistleblower channel; and regular internal audits and employee surveys; and
- engaging with external stakeholders to improve practices to identify and remedy adverse human rights impacts.

## Other information

BMO regularly engages with non-governmental organizations and community groups on various sustainability topics, including potential human rights matters. External stakeholders may also engage with BMO through feedback channels including at [sustainability@bmo.com](mailto:sustainability@bmo.com).

## Process of consultation and approval

Various lines of business and operating groups within BMO were consulted to update this Statement, which is updated on an annual basis, including Legal & Regulatory Compliance, Procurement, Sustainability, Human Resources, Corporate Reporting, Ethics and Conduct, Enterprise and Global Third-Party Risk Management, AML and E&S Risk Management. These groups have global mandates, which includes the subsidiary to which this Statement applies.

This Statement was approved on behalf of the Board of Directors of Bank of Montreal by the duly authorized Audit and Conduct Review Committee of the Board and the Board of Directors of BMO Capital Markets Limited, pursuant to paragraph 54(6)(a) of the UK Act and Chapter 16 of the Australian Act. In accordance with the requirements of the UK Act, and in particular Section 54, and the requirements of the Australian Act and in particular Chapter 16 thereof, I, in the capacity of Chair of the Audit and Conduct Review Committee of the Board of Directors of the Bank of Montreal, attest that I have reviewed the information contained in this Statement, on behalf of the governing body of Bank of Montreal and its subsidiary BMO Capital Markets Limited, with reporting obligations. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Statement is true, accurate and complete in all material respects for the purposes of the UK Act and the Australian Act, for the financial year listed within this report.

This Statement was approved by the Board of Directors of Bank of Montreal.

### Jan Babiak

Chair, Audit and Conduct Review Committee

Dated: April 8, 2026



I have the authority to bind the Bank of Montreal

This Statement was approved by the Board of Directors of BMO Capital Markets Limited.

### Richard Couzens

Director, BMO Capital Markets Limited

Dated: December 16, 2025



I have the authority to bind the Bank of Montreal