June 2026

BMO Capital Markets London – DCM Allocation Policy

Introduction

This debt capital markets ("**DCM**") allocation policy (the "**DCM Allocation Policy**") sets forth policies and principles Bank of Montreal London Branch ("**BMO**") would expect to apply in relation to the marketing, pricing, allocation and distribution of DCM securities offerings (an "**Offering**") for issuer clients (each issuer client being referred to in this DCM Allocation Policy as the "**Issuer**").

BMO will act honestly, fairly and professionally in accordance with the best interests of its Issuer client and in compliance with applicable regulatory requirements.

The key principles of BMO's approach is to ensure that:

- the Issuer is kept fully informed of all relevant aspects of the Offering;
- the Issuer and the investors should be treated fairly; and.
- allocation decisions are made in a consistent, transparent and appropriately documented manner.

Issuer involvement in the allocation process

BMO will agree with the Issuer as early as possible in the allocation process of the Offering:

- the level of involvement of the Issuer in the allocation process;
- the objectives and directions of the Issuer in the allocation process; and
- as set out below, the criteria for judging investors.

The Issuer retains ultimate discretion over allocation decisions, with BMO acting in an advisory capacity unless otherwise agreed.

Approach to allocations

BMO will, upon accepting a mandate for an Offering, discuss the objectives and expectations of the Issuer in relation to the Offering and identify an appropriate pool of target investors (the "**Target Investors**"). BMO will inform the Issuer of the details of the Target Investors to whom the firm intends to offer the financial instruments. To the extent an Offering is substantially the same as a previous Offering for which the Issuer has mandated BMO, it will be understood that the Target Investors will remain substantially the same, unless otherwise agreed. In identifying the Target Investors, BMO will take into account the objectives and expectations of the Issuer, the commercial purpose of the issuance, the behavior of such investors in the debt markets and the participation of investors in other similar Offerings. The Target Investors may be further refined in the course of any marketing or market soundings that are undertaken, and BMO and the Issuer may also take into account any feedback or reverse enquiry provided by an investor during such marketing or market sounds.

This target market assessment will be conducted in compliance with BMO's product governance policies and procedures and will be subject to any instructions, requirements, directions, criteria and/or objectives as may be agreed with the Issuer. BMO will agree the proposed allocation per type of client for the Offering in accordance with this policy.

When recommending specific allocations to the Issuer, BMO will judge each investor against a list of key criteria which will have been pre-agreed with the Issuer. The application of these factors will be dependent on the specific Offering. Unless otherwise agreed with the Issuer, these criteria will include:

1. the perceived quality of the investor;
2. the size of investor demand, particularly in relation to the investor's funds under management and typical order size;
3. the propensity of the investor to hold the securities for the medium to long term;
4. the extent to which the order is consistent with the investor's existing portfolio strategy and/or existing holdings (in particular whether the investor is involved in the broader debt/credit (including loans) market);
5. the type and location of the investor – to ensure targeting of suitable investor types (e.g. specialist funds) and geographical spread, and compliance with any applicable selling restrictions on the Issuer, the Notes and/or BMO;
6. the extent to which the investor has been involved in the product development process;
7. the price leadership and timeliness of the order (particularly in relation to a management meeting);
8. strong issuer/selling securities holder preference for the allocation to the investor; and
9. low execution risk (from knowledge of investor reliability and past behaviour).

In assessing the above criteria, account will be taken of the investor's behaviour in other primary issues. It should also be noted that certain of these criteria will be emphasised depending on the nature of the issuance. For instance, in high yield issuances the criteria of the "extent to which the order is consistent with the investor's existing portfolio strategy and/or existing holdings" will be emphasised due to the specialist nature of the offering, whereas this may not be as important in an Offering deemed to have lower credit risk.

Whilst BMO will intend to allocate securities to investors who are likely to act as long term, supportive holders of the Issuer's debt, provision of liquidity to the aftermarket is an important aspect of any Offering and some allocations will be made to liquidity providers. This may include allocating securities to the market making book of BMO and/or its affiliates.

Allocation will be made at institutional level and not to that institution's underlying accounts. Allocation to investment clients, together with any allocation which may be made to the proprietary account or asset management arm of BMO or its affiliates, could be considered to constitute a conflict of interest. However, recommendations to the Issuer about allocation and pricing will be made to the Issuer solely by personnel from BMO who have no responsibilities for servicing investment clients. To clarify, Allocation decisions will be subject to the segregation of duties, information barriers between sales and allocation personnel, and documented conflict identification, mitigation and approval, where required. In addition, no preference will be given to BMO's affiliates.

Decisions about pricing and specific allocation will be made in consultation with the Issuer. When recommending the pricing of the issue to the Issuer, BMO will draw upon the book of demand generated through the bookbuilding period and take into account feedback provided by investors during the course of the marketing period and the investor education meetings. Updates as to the state of the book of demand will be provided throughout the marketing period, according to the Issuer's requirements and in compliance with the relevant regulatory requirements.

Cooperation with other firms

To the extent that BMO cooperates with other firms in respect of the Issuer's issue, BMO will and the other firms will cooperate on their approach to allocations set out above, and the approach for an Offering may be modified as a result. The allocation approach for any Offering which is syndicated, or which is subject to the allocation policy of one or more additional firms, shall take precedence over, and may supersede and/or differ from the allocation policy described herein as a result.

Prohibited allocation approaches

BMO will not accept any third-payments or benefits unless those payments or benefits comply with the inducements requirements to which BMO is subject.

In accordance with these regulatory requirements, BMO will not engage in the following allocation approaches (amongst others):

- making an allocation to incentivise the payment of disproportionately high fees for unrelated services provided by BMO, such as disproportionately high fees or commissions paid by an investment client, or disproportionately high volumes of business at normal levels of commission provided by the investment client as compensation for receiving an allocation;
- making an allocation to a senior executive or a corporate officer of an existing or potential issuer client, in consideration for the future or past award of corporate finance business;
- making an allocation that is expressly or implicitly conditional on the receipt of future orders or the purchase of any other service from BMO by an investment client, or any entity of which the investor is a corporate officer; or
- any other approaches which are contrary to applicable laws.

Allocation Governance and Record Keeping

BMO will maintain a robust governance and control framework, including:

- documentation of allocation rationale against agreed criteria;
- maintenance of order books;
- evidence of Issuer involvement and approvals;
- documented conflict assessments, if relevant;
- escalation procedures for exceptions or conflicts;
- retention of records in accordance with regulatory requirements.

Monitoring and Review

BMO will perform periodic monitoring and review of allocation activity, including post-transaction reviews where appropriate.

Conflicts of Interest

It is worth noting that BMO has in place more general systems, controls and procedures for identifying and managing conflicts of interest in relation to its DCM business which will not be detailed in this DCM Allocation Policy but BMO maintains systems and controls to identify, manage, record and, where appropriate, disclose conflicts of interest. These measures include conflict identification, escalation and approval procedures, periodic reviews, independent oversight where required and record keeping