

BMO's Supplier Code of Conduct



Doing what's right

BMO's success and reputation are built on the trust we've earned from the people we work with and the customers we serve. Our reputation is one of our greatest assets and everyone associated with our company has a role to play in its protection. We consider the impact our business decisions have on our stakeholders and the communities where we do business and we are committed to always doing the right thing. Our commitment to ethical conduct and sustainability is the foundation of our stakeholders' trust in us and is integral to our Purpose – ***Boldly Grow the Good in business and life.***

BMO's Supplier Code of Conduct (Supplier Code) outlines the principles our suppliers need to support – our standards for integrity, fair dealing, and sustainability.

By working with suppliers who share our commitment to these standards, we seek to:

- maintain a mutually beneficial, long-term relationship with our suppliers; and
- uphold the reputations of both BMO and the suppliers that we engage with.

Complying with this Supplier Code

We expect our suppliers to be aware of, understand, and comply with the principles of this Supplier Code.

These principles are incorporated in our contractual arrangements. A breach of a contractual arrangement may be grounds for termination of a supplier's relationship with us. We will contact law enforcement if laws are broken.

Suppliers must promptly report any potential violations of the Supplier Code to their BMO Supplier Manager or use BMO's Speak Up! whistleblower reporting service ([Speak Up! Service](#)), for secure, confidential, and anonymous reporting 24 hours a day, 7 days a week, in multiple languages. We have zero tolerance for retaliation against anyone who speaks up to report potential violations.



Responsible business practices

Compliance with laws and regulations

Suppliers must comply with the applicable laws and regulations in the jurisdictions in which they operate. This includes not making any express or implicit agreements that violate the letter and spirit of those laws and regulations. As BMO is a regulated financial institution, suppliers must also comply with our Anti-Money Laundering controls and Economic Sanction obligations.

Conflicts of interest

Suppliers must be aware of potential conflicts of interest and use good judgment to avoid them. Suppliers must promptly disclose any perceived, potential, or actual conflicts to their BMO Supplier Manager. This includes situations where a supplier has competing personal or business interests that may compromise or bias their professional judgment, confer an unfair benefit, impact BMO's reputation, or the supplier's ability to carry out their duties for BMO.

Anti-Bribery and Anti-Corruption

Suppliers must never engage in any conduct that would put BMO at risk of violating anti-bribery and anti-corruption laws. Examples of activities which suppliers are prohibited from engaging in include (but are not limited to):

- **Bribery:** providing any item of value (such as a gift, entertainment, favour, or cash) with the intention of influencing a business decision, securing an improper business advantage, obtaining or retaining business or favourable business treatment, or creating a sense of obligation.
- **Facilitating payments:** providing anything of value, including money, to expedite a routine or necessary government service (for example, processing permits).
- **Prohibited gifts and entertainment:** offering or receiving gifts or entertainment that are extravagant, excessive or frequent.

Suppliers must promptly report potentially corrupt practices by a supplier, or within BMO's supply chain to their BMO Supplier Manager or the BMO Anti-Corruption Office at aco@bmo.com. Suppliers can also report through the [Speak Up! Service](#).

Sustainable practices

We trust our suppliers to understand and manage environmental and social risks. These risks include the threat of adverse impacts on climate and the natural environment, as well as risks to labour and human rights, including human trafficking, forced labour and child labour.

BMO partners with the Carbon Disclosure Program (CDP), a globally recognized environmental reporting company, to understand the emissions we enable through our supply chain. At BMO's request, suppliers must disclose their Scope 1 and 2 greenhouse gas emissions via the CDP, or an alternative method determined by BMO.



Responsible treatment of workers

Human rights and employment practices

Suppliers must follow applicable employment laws, 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, suppliers must adopt policies and/or codes of conduct that consider the United Nations Guiding Principles on Business and Human Rights as endorsed by the UN Human Rights Council, and convey these expectations to their own suppliers and subcontractors.

Consistent with [BMO's Statement Against Modern Slavery and Human Trafficking](#), suppliers must not tolerate slavery, servitude, forced or compulsory labour, human trafficking or child labour in their business or supply chain. To support transparency, monitoring and regulations regarding child and forced labour on a global scale, suppliers must report to BMO (through their BMO Supplier Manager) if requested, in respect of all locations in which they or their subcontractors operate (including locations outside of North America).

Suppliers must not tolerate any form of harassment in their workplaces.



Diversity and inclusion

Suppliers must comply with laws that prohibit discrimination based on gender, race, ethnicity, sexual orientation, age, disability, or any other legally protected status.

Workplace safety, security, and health

A safe work environment affects all of us. Suppliers and their workers must adhere to safety laws and regulations and use equipment properly. When accidents occur on BMO's premises or while performing work for BMO, they must be reported immediately to **BMO's Physical Security Contact Centre at 1-800-268-9373**.

Responsible use of information, systems, and other assets

Protecting BMO information and assets

Suppliers must protect and treat BMO's confidential information as agreed to with us. This includes intellectual property, personal employee or customer information, and any data generated or created on BMO's behalf. Suppliers are responsible for protecting BMO's property as well as assets that belong to our clients in accordance with applicable laws, industry practices, and contract terms. Suppliers may use BMO assets (e.g. customer information, systems, equipment, materials, or premises) only for their authorized purpose. Suppliers must notify BMO immediately if they become aware of any security incident, privacy incident or other event that impacts or is likely to impact the confidentiality, integrity, or availability of employee or customer personal information, BMO confidential information, or the systems or services provided by the Supplier to BMO.

Insider trading

While working with BMO, suppliers may become aware of certain non-public "inside information" about BMO or other publicly traded companies. Suppliers must ensure that effective information barriers are in place to prevent buying, selling, or tipping information about securities based on inside information, in breach of securities laws.

Let's connect

Additional information about BMO, including how to contact us, can be found online at [bmo.com](https://www.bmo.com). If you have any questions or concerns related to this Supplier Code, please contact your BMO Supplier Manager. You can also contact BMO's Ethics Office through our confidential and anonymous [Speak Up! Service](#).