

Statement on Anti-Money Laundering, Anti-Terrorist Financing and Sanctions Measures

BMO is committed to meeting the highest standards of compliance with Anti-Money Laundering, Anti-Terrorist Financing and Sanctions Measures (AML). We know this is essential to safeguarding our company, customers, and communities. We believe a robust and effective AML program instills confidence in our customers and stakeholders, giving us a strong foundation to provide a meaningful customer experience.

We strive for effective AML governance through our AML program—the program is designed to be dynamic, adaptable, and address evolving AML risks. BMO’s Chief Anti-Money Laundering Officer (CAMLO) has overall accountability for governance, oversight, and assessment of our AML program. This program is delivered by employees in our AML group, a global team of specialists that use analytics, innovative technology, and professional expertise to deter, detect, and report suspicious activity. The group also supports front-line employees who serve as BMO’s eyes and ears for detecting unusual activity. The CAMLO regularly reports to senior management and our Board of Directors on the effectiveness of our AML program.

Our AML program establishes guidelines and minimum standards for each BMO business across our footprint. We do this to ensure we take all reasonable steps to prevent our products and services from being used for money laundering, terrorist financing, or sanctioned activities. AML program elements include:

- Board and senior management oversight
- Risk assessments of money laundering and terrorist financing risks
- Documented policies and procedures

- Client due diligence
- Enhanced due diligence for higher risk segments
- Mandatory and regulatory reporting
- Employee training
- Self-monitoring and independent review of controls
- Record-keeping and retention
- Independent testing of the AML program’s effectiveness

Issued: October 2011

Updated: February 2022