

# BMO's Supplier Code of Conduct



## Doing what's right

BMO Financial Group's (BMO) success and reputation is built on 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 in its protection. We consider the impact our business decisions have on our stakeholders and the communities where we do business, and 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 BMO expects our suppliers 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 with whom we engage.

### Complying with this Supplier Code

BMO expects employees and suppliers to be aware of, understand, and comply with the principles of the 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 authorities if laws are broken.

## Responsible business practices

### Compliance with laws and regulations

We expect suppliers to 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.

### Conflicts of interest

Be aware of potential conflicts and use good judgment to avoid them. Suppliers must promptly disclose to their BMO supplier manager all matters that could pose a potential, perceived or actual conflict of interest.

### Anti-corruption and anti-money laundering

Suppliers must never engage in any conduct that would put BMO at risk of violating any anti-corruption and anti-money laundering laws. Any potentially corrupt practices occurring within BMO's supply chain should be reported on a confidential, and if preferred, anonymous basis, to BMO through the [Speak Up! reporting service](#) available 24/7 in multiple languages: or promptly contact your supplier manager and/or the BMO Anti-Corruption Office at [aco@bmo.com](mailto:aco@bmo.com).

Important examples include:

- **Bribery:** providing any item of value (such as a gift, favour, or cash sum) that could be viewed as an attempt to influence an individual's actions or decision.
- **Facilitating payments:** providing money often a small amount, and usually cash for government services such as processing permits, providing police protection, or expediting utility services.
- **Gifts and entertainment:** While exchanging customary business courtesies may be appropriate in certain situations, giving or receiving a gift or offer of entertainment is not appropriate if it is extravagant, too frequent, creates a sense of obligation, is done with the intent to influence a business decision or may be perceived as being done with the intent to influence a business decision.

## Sustainable practices

We trust our suppliers to understand and manage environmental and social risks. These risks include the threat of adverse impacts on the natural environment as well as risks to the livelihoods, health and rights of individuals and communities. We expect suppliers to identify, adopt, and integrate environmental and social best practices into their business processes and facilities. Suppliers are also expected to support BMO's efforts to reduce our adverse environmental impacts, where appropriate.

## Responsible treatment of workers

### Human rights and employment practices

Suppliers must abide by applicable employment standards, labour, non-discrimination and human rights legislation. In jurisdictions where employment standards and laws do not address discrimination or human rights, we expect suppliers to do what's right. We encourage suppliers to adopt policies and codes of conduct that consider the United Nations Guiding Principles on Business and Human Rights (UNGP) as endorsed by the UN Human Rights Council, and to convey these expectations to their own suppliers.

Suppliers must not tolerate slavery, servitude, forced or compulsory labour, human trafficking or child labour in their business or supply chain. Harassing conduct – intentional or not – should be prohibited in their workplaces. Suppliers must comply with workers' right to join a trade union, or to have recognized employee representation under local law and follow the applicable wage and hour laws and regulations in the jurisdictions in which they operate.

### Diversity and inclusion

We expect suppliers to observe laws that prohibit discrimination based on gender, race, ethnicity, sexual orientation, age, disability and work style or any other legally protected status.

### Supplier diversity

BMO's goal is to use diverse suppliers for our business needs. BMO believes that including a range of diverse parties is important to an economic and competitive future in our communities. For these reasons, we seek to work with suppliers who perform at a high level and also add a diverse perspective to BMO. We encourage suppliers to identify, adopt, and integrate diversity into their processes.



## Workplace safety, security, and health

A safe work environment affects all of us. We expect suppliers and their workers to 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 BMO generates. Suppliers are responsible for protecting BMO property as well as assets that belong to our clients. Suppliers may use assets (e.g. customer information data, systems, equipment, materials, or premises) only for their authorized purpose.

### Insider trading

As a BMO supplier, you may have access to certain "inside information" about publicly traded companies. Suppliers must ensure that information barriers are in place to prevent buying, selling, or tipping information about securities based on inside information.

## 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 about the Supplier Code please contact your supplier manager. If you have concerns about potential or actual violations of the Supplier Code, contact BMO through the [Speak Up! reporting service](#) available 24/7 in multiple languages, or promptly contact your supplier manager.