



LEA 02	Discretionary	Gateway
<p>Reason for Interaction</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> To support investment decisionmaking in & company related ESG issues <input checked="" type="checkbox"/> To enhance corporate transition or identify the need to transition on ESG issues <input type="checkbox"/> To engage internal ESG disclosure <input type="checkbox"/> Other: specify <input type="checkbox"/> We do not engage via internal staff <input type="checkbox"/> To support investment decisionmaking in & company related ESG issues <input type="checkbox"/> To enhance corporate transition or identify the need to transition on ESG issues <input type="checkbox"/> Other: specify 	<p>Type of engagement</p> <ul style="list-style-type: none"> <input type="checkbox"/> Individual/ internal staff engagements <input type="checkbox"/> Collaborative engagements <input type="checkbox"/> Service provider engagements 	<p>Reason for Interaction</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> To support investment decisionmaking in & company related ESG issues <input checked="" type="checkbox"/> To enhance corporate transition or identify the need to transition on ESG issues <input type="checkbox"/> To engage internal ESG disclosure <input type="checkbox"/> Other: specify <input type="checkbox"/> We do not engage via internal staff <input type="checkbox"/> To support investment decisionmaking in & company related ESG issues <input type="checkbox"/> To enhance corporate transition or identify the need to transition on ESG issues <input type="checkbox"/> Other: specify

RI TRANSPARENCY REPORT

2020

BMO Global Asset Management

About this report

The PRI Reporting Framework is a key step in the journey towards building a common language and industry standard for reporting responsible investment (RI) activities. This RI Transparency Report is one of the key outputs of this Framework. Its primary objective is to enable signatory transparency on RI activities and facilitate dialogue between investors and their clients, beneficiaries and other stakeholders. A copy of this report will be publicly disclosed for all reporting signatories on the [PRI website](#), ensuring accountability of the PRI Initiative and its signatories.

This report is an export of the individual Signatory organisation's response to the PRI during the reporting period specified above. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information.

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

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OO 01.1 Select the services and funds you offer

Select the services and funds you offer	% of asset under management (AUM) in ranges
Fund management	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50%
Fund of funds, manager of managers, sub-advised products	<input type="radio"/> 0% <input checked="" type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Other	<input checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Total 100%	

OO 02.1 Select the location of your organisation's headquarters.

Canada

OO 02.2 Indicate the number of countries in which you have offices (including your headquarters).

1
 2-5
 6-10
 >10

OO 02.3 Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).

1200

OO 02.4 Additional information. [Optional]

Our headquarters are located in Toronto, Ontario, Canada.

OO 03.1 Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.

Yes

OO 03.2 List your subsidiaries that are separate PRI signatories and indicate if you would like to report their RI activities in your organisation's consolidated report.

Name of PRI signatory subsidiary (Up to six subsidiaries may be reported)	RI implementation reported here on a consolidated basis
Pyrford International Limited	<input type="radio"/> Yes <input checked="" type="radio"/> No
<input type="radio"/> Yes <input checked="" type="radio"/> No	
<input type="radio"/> Yes <input checked="" type="radio"/> No	

No

OO 04.1 Indicate the year end date for your reporting year.

31/10/2019

OO 04.2 Indicate your total AUM at the end of your reporting year.

Total AUM
 270,603,251,279 USD
 270603251279 USD

OO 04.3 Indicate the total AUM of subsidiaries you have excluded from your report (as named in OO 03.2 under "No"). Provide this figure based on the end of your reporting year

Total excluded subsidiaries AUM
 10,756,296,533 USD
 10756296533 USD

OO 04.4 Indicate the assets which are subject to an execution and/or advisory approach. Provide this figure based on the end of your reporting year

Not applicable as we do not have any assets under execution and/or advisory approach

OO 05 Mandatory to Report, Voluntary to Disclose Gateway General

OO 05.1 Provide an approximate percentage breakdown of your AUM at the end of your reporting year using the following asset classes and investment strategies:

	Internally managed (%)	Externally managed (%)
Listed equity	10-50%	<10%
Fixed income	10-50%	<10%
Private equity	<10%	<10%
Property	<10%	<10%
Infrastructure	<10%	<10%
Commodities	0	0
Hedge funds	<10%	<10%
Fund of hedge funds	0	0
Forestry	0	0
Farmland	0	0
Inclusive finance	0	0
Cash	<10%	<10%
Money market instruments	0	0
Other (1), specify	<10%	<10%
Other (2), specify	0	0

Internally managed `Other (1)` description

LDI

Externally managed `Other (1)` description

n/a

OO 06 Mandatory Descriptive General

OO 06.1 Select how you would like to disclose your asset class mix.

- as percentage breakdown
- as broad ranges

OO 06.3 Indicate whether your organisation has any off-balance sheet assets [Optional].

- Yes
- No

OO 06.5 Indicate whether your organisation uses fiduciary managers.

- Yes, we use a fiduciary manager and our response to OO 5.1 is reflective of their management of our assets.
- No, we do not use fiduciary managers.

00 07	Mandatory to Report, Voluntary to Disclose	Gateway	General
Private			
00 08	Mandatory to Report, Voluntary to Disclose	Peering	General
Private			
00 09	Mandatory	Peering	General
00 09.1	Indicate the breakdown of your organisation's AUM by market.		
90	Developed Markets		
9	Emerging Markets		
1	Frontier Markets		
0	Other Markets		
00 10	Mandatory	Gateway	General
00 10.1	Select the active ownership activities your organisation implemented in the reporting year.		
Listed equity – engagement			
<input checked="" type="checkbox"/> We engage with companies on ESG factors via our staff, collaborations or service providers. <input type="checkbox"/> We require our external managers to engage with companies on ESG factors on our behalf. <input type="checkbox"/> We do not engage directly and do not require external managers to engage with companies on ESG factors.			
Listed equity – voting			
<input checked="" type="checkbox"/> We cast our (proxy) votes directly or via dedicated voting providers <input type="checkbox"/> We require our external managers to vote on our behalf. <input type="checkbox"/> We do not cast our (proxy) votes directly and do not require external managers to vote on our behalf			
Fixed income SSA – engagement			
<input checked="" type="checkbox"/> We engage with SSA bond issuers on ESG factors via our staff, collaborations or service providers. <input type="checkbox"/> We require our external managers to engage with SSA bond issuers on ESG factors on our behalf. <input type="checkbox"/> We do not engage directly and do not require external managers to engage with SSA bond issuers on ESG factors. Please explain why you do not.			
Fixed income Corporate (financial) – engagement			
<input checked="" type="checkbox"/> We engage with companies on ESG factors via our staff, collaborations or service providers. <input type="checkbox"/> We require our external managers to engage with companies on ESG factors on our behalf. <input type="checkbox"/> We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.			
Fixed income Corporate (non-financial) – engagement			
<input checked="" type="checkbox"/> We engage with companies on ESG factors via our staff, collaborations or service providers. <input type="checkbox"/> We require our external managers to engage with companies on ESG factors on our behalf. <input type="checkbox"/> We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.			
Fixed income Corporate (securitised) – engagement			
<input checked="" type="checkbox"/> We engage with companies on ESG factors via our staff, collaborations or service providers. <input type="checkbox"/> We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.			
00 11	Mandatory	Gateway	General
00 11.1	Select the internally managed asset classes in which you addressed ESG incorporation into your investment decisions and/or your active ownership practices (during the reporting year).		
Listed equity			
<input checked="" type="checkbox"/> We address ESG incorporation. <input type="checkbox"/> We do not do ESG incorporation.			
Fixed income - SSA			
<input checked="" type="checkbox"/> We address ESG incorporation. <input type="checkbox"/> We do not do ESG incorporation.			

	Fixed income - corporate (financial)
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
	Fixed income - corporate (non-financial)
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
	Fixed income - securitised
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
	Private equity
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
	Property
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
	Infrastructure
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
	Hedge funds
<input type="checkbox"/>	We address ESG incorporation.
<input checked="" type="checkbox"/>	We do not do ESG incorporation.
	Cash
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
	Other (1)
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
	Other (1) [as defined in 00 05]
LDI	

00 11.2 Select the externally managed assets classes in which you and/or your investment consultants address ESG incorporation in your external manager selection, appointment and/or monitoring processes.

Asset class	ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes
Listed equity	Listed equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes
	<input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation
Fixed income - SSA	Fixed income - SSA - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes
	<input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation

Fixed income - corporate (financial)	<p>Fixed income - corporate (financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation
Fixed income - corporate (non-financial)	<p>Fixed income - corporate (non-financial) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation
Private equity	<p>Private equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input type="checkbox"/> We incorporate ESG into our external manager appointment process <input type="checkbox"/> We invest only in pooled funds and external manager appointment is not applicable <input type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation
Property	<p>Property - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation
Infrastructure	<p>Infrastructure - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input type="checkbox"/> We incorporate ESG into our external manager appointment process <input type="checkbox"/> We invest only in pooled funds and external manager appointment is not applicable <input type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation
Hedge funds	<p>Hedge funds - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <ul style="list-style-type: none"> <input type="checkbox"/> We incorporate ESG into our external manager selection process <input type="checkbox"/> We incorporate ESG into our external manager appointment process <input type="checkbox"/> We invest only in pooled funds and external manager appointment is not applicable <input type="checkbox"/> We incorporate ESG into our external manager monitoring process <input checked="" type="checkbox"/> We do not do ESG incorporation
Cash	<p>Cash - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input type="checkbox"/> We incorporate ESG into our external manager appointment process <input type="checkbox"/> We invest only in pooled funds and external manager appointment is not applicable <input type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation

Other (1)	Other (1) - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes
	<input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input type="checkbox"/> We incorporate ESG into our external manager appointment process <input type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation

OO 11.3b If your organisation does not integrate ESG factors into investment decisions on your externally managed assets, explain why not.
n/a

OO 11.4 Provide a brief description of how your organisation includes responsible investment considerations in your investment manager selection, appointment and monitoring processes.

Different units across BMO Global Asset Management apply different approaches to including responsible investment considerations in the management of external managers. They range from including ESG-specific questions in RFPs and base the selection process on certain ESG requirements, to working with manager scorecards that incorporate ESG and annual monitoring of ESG performance.

ESG integration forms a key component of our manager selection and monitoring process; we evaluate the ESG credentials of every fund / manager held within our fiduciary portfolios. In the selection and monitoring phase, managers are evaluated on both use of ESG within the portfolio and also the extent to which ESG is embedded in their wider organisation. Scoring of ESG credentials follows the same path as other criteria; ESG (related) topics can also cause reasons to terminate the agreement with the manager.

The key input to our ESG monitoring process is a questionnaire that we send to managers to help us gather facts and identify changes over time. This questionnaire includes explicit questions on ESG related topics including: corporate ESG policy and objectives, ESG integration into investment or asset management processes, approach to engagement and voting, resources for integrating ESG considerations into your investment process and reporting. The questionnaire was developed by the manager selection team in collaboration with BMO's highly experienced Responsible Investment team with input from our Alternatives business to ensure that the questions are relevant for managers in traditional asset classes as well as alternatives.

Reviewing the answers from each manager on a regular basis allows the manager selection team to reappraise our score for each manager on their use of ESG within their process and how ESG is embedded in their organisation.

OO 12	Mandatory	Gateway	General
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OO 12.1 Below are all applicable modules or sections you may report on. Those which are mandatory to report (asset classes representing 10% or more of your AUM) are already ticked and read-only. Those which are voluntary to report on can be opted into by ticking the box.

Core modules

- Organisational Overview
- Strategy and Governance

RI implementation directly or via service providers

Direct - Listed Equity incorporation

- Listed Equity incorporation

Direct - Listed Equity active ownership

- Engagements
- (Proxy) voting

Direct - Fixed Income

- Fixed income - SSA
- Fixed income - Corporate (financial)
- Fixed income - Corporate (non-financial)
- Fixed income - Securitised

Direct - Other asset classes with dedicated modules

- Private Equity
- Property
- Infrastructure

RI implementation via external managers

Indirect - Selection, Appointment and Monitoring of External Managers

- Listed Equities
- Fixed income - SSA
- Fixed income - Corporate (financial)
- Fixed income - Corporate (non-financial)
- Private Equity
- Property
- Infrastructure

	Closing module
	<input checked="" type="checkbox"/> Closing module

OO LE 01	Mandatory to Report, Voluntary to Disclose	Gateway	General
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OO LE 01.1	Provide a breakdown of your internally managed listed equities by passive, active - quantitative (quant), active - fundamental and active - other strategies.
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33	Passive
35	Active - quantitative (quant)
32	Active - fundamental and active - other

OO FI 01	Mandatory to Report, Voluntary to Disclose	Gateway	General
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OO FI 01.1	Provide a breakdown of your internally managed fixed income securities by active and passive strategies
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SSA	11	Passive
	0	Active - quantitative (quant)
	89	Active - fundamental and active - other
Corporate (financial)	10	Passive
	0	Active - quantitative (quant)
	90	Active - fundamental and active - other
Corporate (non-financial)	11	Passive
	0	Active - quantitative (quant)
	89	Active - fundamental and active - other
Securitized	2	Passive
	0	Active - quantitative (quant)
	98	Active - fundamental and active - other

OO FI 03	Mandatory	Descriptive	General
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OO FI 03.1	Indicate the approximate (+/- 5%) breakdown of your SSA investments, by developed markets and emerging markets.
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SSA	94	Developed markets
	6	Emerging markets

OO FI 03.2	Indicate the approximate (+/- 5%) breakdown of your corporate and securitized investments by investment grade or high-yield securities.
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Type	Investment grade (+/- 5%)	High-yield (+/- 5%)	Total internally managed
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Corporate (financial)	<input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%	<input type="radio"/> >50% <input type="radio"/> 10-50% <input checked="" type="radio"/> <10% <input type="radio"/> 0%	100%
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OO SAM 01	Mandatory to Report, Voluntary to Disclose	Gateway	General
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Private

OO PE 01	Mandatory	Descriptive	General
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OO PE 01.1 Provide a breakdown of your organisation's internally managed private equity investments by investment strategy.

Investment strategy	Percentage of your internally managed private equity holdings (in terms of AUM)
Venture capital	<input type="radio"/> >50% <input type="radio"/> 10-50% <input checked="" type="radio"/> <10% <input type="radio"/> 0%
Growth capital	<input type="radio"/> >50% <input checked="" type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%
(Leveraged) buy-out	<input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%
Distressed/Turnaround/Special Situations	<input type="radio"/> >50% <input type="radio"/> 10-50% <input checked="" type="radio"/> <10% <input type="radio"/> 0%
Secondaries	<input type="radio"/> >50% <input checked="" type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%
Other investment strategy, specify (1)	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
Other investment strategy, specify (2)	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
Total 100%	

OO PE 02	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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Private

OO PR 01	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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Private

OO PR 02	Mandatory to Report, Voluntary to Disclose	Gateway	General
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Private

OO PR 03	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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Private

OO INF 01	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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Private

OO INF 02	Mandatory to Report, Voluntary to Disclose	Gateway/Peering	General
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Private

OO INF 03	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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Private

OO HF 01	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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Private

OO Checks			Checks
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If there are any messages below, please review them before continuing. If there are no messages below, please save this page and continue.

SG 01	Mandatory	Core Assessed	General													
SG 01.1	Indicate if you have an investment policy that covers your responsible investment approach.															
<input checked="" type="checkbox"/> Yes																
SG 01.2	Indicate the components/types and coverage of your policy.															
<table border="1"> <thead> <tr> <th>Policy components/types</th> <th>Coverage by AUM</th> </tr> </thead> <tbody> <tr> <td><input checked="" type="checkbox"/> Policy setting out your overall approach</td> <td rowspan="10"> <input checked="" type="checkbox"/> Applicable policies cover all AUM <input type="checkbox"/> Applicable policies cover a majority of AUM <input type="checkbox"/> Applicable policies cover a minority of AUM </td> </tr> <tr> <td><input checked="" type="checkbox"/> Formalised guidelines on environmental factors</td> </tr> <tr> <td><input checked="" type="checkbox"/> Formalised guidelines on social factors</td> </tr> <tr> <td><input checked="" type="checkbox"/> Formalised guidelines on corporate governance factors</td> </tr> <tr> <td><input type="checkbox"/> Fiduciary (or equivalent) duties</td> </tr> <tr> <td><input type="checkbox"/> Asset class-specific RI guidelines</td> </tr> <tr> <td><input type="checkbox"/> Sector specific RI guidelines</td> </tr> <tr> <td><input checked="" type="checkbox"/> Screening / exclusions policy</td> </tr> <tr> <td><input type="checkbox"/> Other, specify (1)</td> </tr> <tr> <td><input type="checkbox"/> Other, specify(2)</td> </tr> </tbody> </table>		Policy components/types	Coverage by AUM	<input checked="" type="checkbox"/> Policy setting out your overall approach	<input checked="" type="checkbox"/> Applicable policies cover all AUM <input type="checkbox"/> Applicable policies cover a majority of AUM <input type="checkbox"/> Applicable policies cover a minority of AUM	<input checked="" type="checkbox"/> Formalised guidelines on environmental factors	<input checked="" type="checkbox"/> Formalised guidelines on social factors	<input checked="" type="checkbox"/> Formalised guidelines on corporate governance factors	<input type="checkbox"/> Fiduciary (or equivalent) duties	<input type="checkbox"/> Asset class-specific RI guidelines	<input type="checkbox"/> Sector specific RI guidelines	<input checked="" type="checkbox"/> Screening / exclusions policy	<input type="checkbox"/> Other, specify (1)	<input type="checkbox"/> Other, specify(2)		
Policy components/types	Coverage by AUM															
<input checked="" type="checkbox"/> Policy setting out your overall approach	<input checked="" type="checkbox"/> Applicable policies cover all AUM <input type="checkbox"/> Applicable policies cover a majority of AUM <input type="checkbox"/> Applicable policies cover a minority of AUM															
<input checked="" type="checkbox"/> Formalised guidelines on environmental factors																
<input checked="" type="checkbox"/> Formalised guidelines on social factors																
<input checked="" type="checkbox"/> Formalised guidelines on corporate governance factors																
<input type="checkbox"/> Fiduciary (or equivalent) duties																
<input type="checkbox"/> Asset class-specific RI guidelines																
<input type="checkbox"/> Sector specific RI guidelines																
<input checked="" type="checkbox"/> Screening / exclusions policy																
<input type="checkbox"/> Other, specify (1)																
<input type="checkbox"/> Other, specify(2)																
SG 01.3	Indicate if the investment policy covers any of the following															
<input checked="" type="checkbox"/> Your organisation's definition of ESG and/or responsible investment and it's relation to investments <input checked="" type="checkbox"/> Your investment objectives that take ESG factors/real economy influence into account <input type="checkbox"/> Time horizon of your investment <input checked="" type="checkbox"/> Governance structure of organisational ESG responsibilities <input checked="" type="checkbox"/> ESG incorporation approaches <input checked="" type="checkbox"/> Active ownership approaches <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Climate change <input type="checkbox"/> Understanding and incorporating client / beneficiary sustainability preferences <input type="checkbox"/> Other RI considerations, specify (1) <input type="checkbox"/> Other RI considerations, specify (2)																
SG 01.4	Describe your organisation's investment principles and overall investment strategy, interpretation of fiduciary (or equivalent) duties, and how they consider ESG factors and real economy impact.															
<p>Investment decisions are always made in the best interests of our clients. Supporting these decisions is our belief that prudent management of environmental, social and governance (ESG) issues can have an important impact on the creation of long-term investor value. Material ESG considerations are, therefore, integrated into our overall investment process for actively managed assets. Our research analysts and portfolio managers follow a process that considers the potential impact of ESG issues related to investments in our portfolios, and we seek partners that do the same. This analysis informs our asset allocation, stock selection, portfolio construction, shareholder engagement and voting.</p>																
<input type="checkbox"/> No																

SG 01 CC	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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Private

SG 02	Mandatory	Core Assessed	PRI 6
SG 02.1	Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document.		
<input checked="" type="checkbox"/> Policy setting out your overall approach			
		URL/Attachment	
<input checked="" type="checkbox"/> URL https://www.bmogam.com/gb-en/intermediary/wp-content/uploads/2019/05/responsible-investment-approach.pdf			
<input type="checkbox"/> Attachment (will be made public)			
<input checked="" type="checkbox"/> Formalised guidelines on environmental factors			
		URL/Attachment	
<input checked="" type="checkbox"/> URL https://www.bmogam.com/gb-en/intermediary/wp-content/uploads/2020/02/climate-change-approach.pdf			
<input type="checkbox"/> Attachment (will be made public)			
<input checked="" type="checkbox"/> Formalised guidelines on social factors			

	URL/Attachment
<input checked="" type="checkbox"/> URL	https://www.bmogam.com/wp-content/uploads/2020/03/expectations-for-social-policies.pdf
<input type="checkbox"/> Attachment (will be made public)	
<input checked="" type="checkbox"/> Formalised guidelines on corporate governance factors	
	URL/Attachment
<input checked="" type="checkbox"/> URL	https://www.bmogam.com/gb-en/intermediary/wp-content/uploads/2019/05/corporate-governance-guidelines.pdf
<input type="checkbox"/> Attachment (will be made public)	
<input checked="" type="checkbox"/> Screening / exclusions policy	
	URL/Attachment
<input checked="" type="checkbox"/> URL	https://www.bmogam.com/gb-en/intermediary/wp-content/uploads/2020/02/responsible-investment-strategies-summary-criteria.pdf
<input type="checkbox"/> Attachment (will be made public)	
<input checked="" type="checkbox"/> Engagement policy	
	URL/Attachment
<input checked="" type="checkbox"/> URL	https://www.bmogam.com/gb-en/intermediary/wp-content/uploads/2018/10/responsible-ownership-policy.pdf
<input type="checkbox"/> Attachment (will be made public)	
<input checked="" type="checkbox"/> (Proxy) voting policy	
	URL/Attachment
<input checked="" type="checkbox"/> URL	https://www.bmogam.com/gb-en/intermediary/wp-content/uploads/2019/05/conflicts-of-interest-policy-%E2%80%93-proxy-voting.pdf
<input type="checkbox"/> Attachment (will be made public)	
<input type="checkbox"/> We do not publicly disclose our investment policy documents	

SG 02.2 Indicate if any of your investment policy components are publicly available. Provide URL and an attachment of the document.

<input checked="" type="checkbox"/> Your organisation's definition of ESG and/or responsible investment and it's relation to investments	
	URL/Attachment
<input checked="" type="checkbox"/> URL	https://www.bmogam.com/gb-en/intermediary/wp-content/uploads/2019/05/responsible-investment-approach.pdf
<input type="checkbox"/> Attachment	
<input checked="" type="checkbox"/> Your investment objectives that take ESG factors/real economy influence into account	
	URL/Attachment
<input checked="" type="checkbox"/> URL	https://www.bmogam.com/gb-en/intermediary/wp-content/uploads/2019/05/responsible-investment-approach.pdf
<input type="checkbox"/> Attachment	
<input checked="" type="checkbox"/> Governance structure of organisational ESG responsibilities	
	URL/Attachment
<input checked="" type="checkbox"/> URL	https://www.bmogam.com/gb-en/intermediary/wp-content/uploads/2019/05/corporate-governance-guidelines.pdf
<input type="checkbox"/> Attachment	
<input checked="" type="checkbox"/> ESG incorporation approaches	
	URL/Attachment
<input checked="" type="checkbox"/> URL	https://www.bmogam.com/gb-en/intermediary/wp-content/uploads/2019/05/responsible-investment-approach.pdf
<input type="checkbox"/> Attachment	
<input checked="" type="checkbox"/> Active ownership approaches	
	URL/Attachment

- URL
<https://www.bmogam.com/gb-en/intermediary/wp-content/uploads/2019/05/corporate-governance-guidelines.pdf>
- Attachment
- Reporting
- Climate change
- We do not publicly disclose any investment policy components

SG 02.3 Additional information [Optional].

Climate Change: <https://www.bmogam.com/gb-en/institutional/wp-content/uploads/2020/02/climate-change-approach.pdf>
 Social practices expectations: <https://www.bmogam.com/wp-content/uploads/2020/03/expectations-for-social-policies.pdf>

SG 03 Mandatory Core Assessed General

SG 03.1 Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.

Yes

SG 03.2 Describe your policy on managing potential conflicts of interest in the investment process.

BMO's Code of Conduct calls for the management of conflicts of interest. The Code of Conduct applies to all directors and employees of BMO Financial Group and its direct and indirect subsidiaries. Specifically, BMO employees are expected to ensure personal and business affairs do not conflict with - or appear to conflict with - BMO's interests or the interests of BMO's current or prospective customers, counterparties and suppliers. The Conflicts of Interest Operating Directive, which every BMO employee has to follow, establishes a common, enterprise wide set of standards, guidance and process for dealing with potential conflicts of interest. We are aware that a conflict of interest may sometimes arise in connection with a responsible investment matter, e.g. engagement or voting. BMO Global Asset Management has a policy that outlines the arrangements in place for preventing or managing conflicts of interest.

No

SG 04 Voluntary Descriptive General

Private

SG 05 Mandatory Gateway/Core Assessed General

SG 05.1 Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad-hoc basis
- It is not set/reviewed

SG 06 Voluntary Descriptive General

Private

SG 07 Mandatory Core Assessed General

SG 07.1 Indicate the internal and/or external roles used by your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for responsible investment.

Roles

- Board members or trustees
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Internal Roles (triggers other options)

Select from the below internal roles

- Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Other Chief-level staff or head of department, specify
 - All direct reports to CIO
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment

- Portfolio managers
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Investment analysts
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Dedicated responsible investment staff
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Investor relations
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Other role, specify (1)
- Other role, specify (2)
- External managers or service providers
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment

SG 07.2 For the roles for which you have RI oversight/accountability or implementation responsibilities, indicate how you execute these responsibilities.

SG 07.3 Indicate the number of dedicated responsible investment staff your organisation has.

17

SG 07 CC	Mandatory to Report, Voluntary to Disclose	Descriptive	General
<i>Private</i>			

SG 08	Voluntary	Additional Assessed	General
<i>Private</i>			

SG 09	Mandatory	Core Assessed	PRI 4,5
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SG 09.1 Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played.

- Principles for Responsible Investment

Your organisation's role in the initiative during the reporting period (see definitions)

Advanced

- Asian Corporate Governance Association

Your organisation's role in the initiative during the reporting period (see definitions)

Moderate

- Australian Council of Superannuation Investors
- AVCA: Sustainability Committee
- France Invest – La Commission ESG
- BVCA – Responsible Investment Advisory Board
- CDP Climate Change

Your organisation's role in the initiative during the reporting period (see definitions)

Moderate

- CDP Forests

Your organisation's role in the initiative during the reporting period (see definitions)

Moderate

- CDP Water

Your organisation's role in the initiative during the reporting period (see definitions)
Moderate
<input type="checkbox"/> CFA Institute Centre for Financial Market Integrity <input checked="" type="checkbox"/> Climate Action 100+
Your organisation's role in the initiative during the reporting period (see definitions)
Advanced
<input type="checkbox"/> Code for Responsible Investment in SA (CRISA) <input checked="" type="checkbox"/> Council of Institutional Investors (CII)
Your organisation's role in the initiative during the reporting period (see definitions)
Advanced
<input checked="" type="checkbox"/> Eumedion
Your organisation's role in the initiative during the reporting period (see definitions)
Moderate
<input type="checkbox"/> Extractive Industries Transparency Initiative (EITI) <input type="checkbox"/> ESG Research Australia <input type="checkbox"/> Invest Europe Responsible Investment Roundtable <input checked="" type="checkbox"/> Global Investors Governance Network (GIGN)
Your organisation's role in the initiative during the reporting period (see definitions)
Basic
<input type="checkbox"/> Global Impact Investing Network (GIIN) <input type="checkbox"/> Global Real Estate Sustainability Benchmark (GRESB) <input checked="" type="checkbox"/> Green Bond Principles
Your organisation's role in the initiative during the reporting period (see definitions)
Moderate
<input type="checkbox"/> HKVCA: ESG Committee <input checked="" type="checkbox"/> Institutional Investors Group on Climate Change (IIGCC)
Your organisation's role in the initiative during the reporting period (see definitions)
Advanced
<input type="checkbox"/> Interfaith Center on Corporate Responsibility (ICCR) <input checked="" type="checkbox"/> International Corporate Governance Network (ICGN)
Your organisation's role in the initiative during the reporting period (see definitions)
Advanced
<input type="checkbox"/> Investor Group on Climate Change, Australia/New Zealand (IGCC) <input type="checkbox"/> International Integrated Reporting Council (IIRC) <input checked="" type="checkbox"/> Investor Network on Climate Risk (INCR)/CERES
Your organisation's role in the initiative during the reporting period (see definitions)
Basic
<input type="checkbox"/> Local Authority Pension Fund Forum <input type="checkbox"/> Principles for Financial Action in the 21st Century <input type="checkbox"/> Principles for Sustainable Insurance <input checked="" type="checkbox"/> Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify US Social Investment Forum, UKSIF
Your organisation's role in the initiative during the reporting period (see definitions)
Moderate
<input type="checkbox"/> Responsible Finance Principles in Inclusive Finance <input checked="" type="checkbox"/> Shareholder Association for Research and Education (Share)
Your organisation's role in the initiative during the reporting period (see definitions)
Moderate
<input checked="" type="checkbox"/> United Nations Environmental Program Finance Initiative (UNEP FI)
Your organisation's role in the initiative during the reporting period (see definitions)
Basic

United Nations Global Compact

	Your organisation's role in the initiative during the reporting period (see definitions)
Basic	

Other collaborative organisation/initiative, specify

Quoted Companies Alliance (QCA)

	Your organisation's role in the initiative during the reporting year (see definitions)
Moderate	

Other collaborative organisation/initiative, specify

The Investment Association

	Your organisation's role in the initiative during the reporting year (see definitions)
Moderate	

Other collaborative organisation/initiative, specify

Workforce Disclosure Initiative

	Your organisation's role in the initiative during the reporting year (see definitions)
Advanced	

Other collaborative organisation/initiative, specify

Responsible Investment Association Canada

	Your organisation's role in the initiative during the reporting year (see definitions)
Moderate	

SG 09.2	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1
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Private

SG 10	Mandatory	Core Assessed	PRI 4
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SG 10.1 Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.

Yes

SG 10.2 Indicate the actions your organisation has taken to promote responsible investment independently of collaborative initiatives. Provide a description of your role in contributing to the objectives of the selected action and the typical frequency of your participation/contribution.

Provided or supported education or training programmes (this includes peer to peer RI support) Your education or training may be for clients, investment managers, actuaries, broker/dealers, investment consultants, legal advisers etc.)

	Description
	Our dedicated Responsible Investment team provides education programmes on a wide range of RI issues for investment teams across the organisation on a monthly basis. The team also records RI webinars that are accessible to clients as well as investee companies.

	Frequency of contribution
<input checked="" type="checkbox"/> Quarterly or more frequently	
<input type="checkbox"/> Biannually	
<input type="checkbox"/> Annually	
<input type="checkbox"/> Less frequently than annually	
<input type="checkbox"/> Ad hoc	
<input type="checkbox"/> Other	

Provided financial support for academic or industry research on responsible investment

Provided input and/or collaborated with academia on RI related work

	Description
	Collaborated with an academic on broader RI and engagement research; academic cooperation on sustainable finance in EM (lecture curriculum), exchanges on corporate diversity, deforestation, and living wage

	Frequency of contribution
<input type="checkbox"/> Quarterly or more frequently	
<input type="checkbox"/> Biannually	
<input checked="" type="checkbox"/> Annually	
<input type="checkbox"/> Less frequently than annually	
<input type="checkbox"/> Ad hoc	
<input type="checkbox"/> Other	

Encouraged better transparency and disclosure of responsible investment practices across the investment industry

Description
Through encouraging the adoption of stewardship principles/codes across various jurisdictions.
Frequency of contribution
<input checked="" type="checkbox"/> Quarterly or more frequently <input type="checkbox"/> Biannually <input type="checkbox"/> Annually <input type="checkbox"/> Less frequently than annually <input type="checkbox"/> Ad hoc <input type="checkbox"/> Other

Spoke publicly at events and conferences to promote responsible investment

Description
Investment managers and members of the Responsible Investment team spoke publicly at industry events/conferences on a wide range of RI issues, including corporate governance, ESG integration, active ownership, ESG/RI/SRI funds and impact investing
Frequency of contribution
<input checked="" type="checkbox"/> Quarterly or more frequently <input type="checkbox"/> Biannually <input type="checkbox"/> Annually <input type="checkbox"/> Less frequently than annually <input type="checkbox"/> Ad hoc <input type="checkbox"/> Other

Wrote and published in-house research papers on responsible investment

Description
Please refer to http://bmogamviewpoints.com/market-perspectives/responsible-investing/?utm_source=GAM%20Website&utm_medium=referral&utm_term=Insights
Frequency of contribution
<input checked="" type="checkbox"/> Quarterly or more frequently <input type="checkbox"/> Biannually <input type="checkbox"/> Annually <input type="checkbox"/> Less frequently than annually <input type="checkbox"/> Ad hoc <input type="checkbox"/> Other

Encouraged the adoption of the PRI

Description
Through engagement with companies which we invest in; in conversation with other investors and our clients
Frequency of contribution
<input type="checkbox"/> Quarterly or more frequently <input type="checkbox"/> Biannually <input type="checkbox"/> Annually <input type="checkbox"/> Less frequently than annually <input checked="" type="checkbox"/> Ad hoc <input type="checkbox"/> Other

Responded to RI related consultations by non-governmental organisations (OECD, FSB etc.)

Description
We contribute to public policy, where we seek to be a constructive investor voice, and to advocate policies that raise the bar for the management of ESG risks faced by the companies in which we invest.
Frequency of contribution
<input checked="" type="checkbox"/> Quarterly or more frequently <input type="checkbox"/> Biannually <input type="checkbox"/> Annually <input type="checkbox"/> Less frequently than annually <input type="checkbox"/> Ad hoc <input type="checkbox"/> Other

Wrote and published articles on responsible investment in the media

	Description
	Various articles, bylines, interviews published over the reporting period by various RI team members, fund managers, sales executives
	Frequency of contribution
	<input checked="" type="checkbox"/> Quarterly or more frequently <input type="checkbox"/> Biannually <input type="checkbox"/> Annually <input type="checkbox"/> Less frequently than annually <input type="checkbox"/> Ad hoc <input type="checkbox"/> Other
	<input checked="" type="checkbox"/> A member of PRI advisory committees/ working groups, specify
	Description
	Member of various working groups - sustainable forests, palm oil, tax, conflict minerals
	Frequency of contribution
	<input checked="" type="checkbox"/> Quarterly or more frequently <input type="checkbox"/> Biannually <input type="checkbox"/> Annually <input type="checkbox"/> Less frequently than annually <input type="checkbox"/> Ad hoc <input type="checkbox"/> Other
	<input type="checkbox"/> On the Board of, or officially advising, other RI organisations (e.g. local SIFs)
	<input type="checkbox"/> Other, specify
<input type="radio"/>	No

SG 11	Voluntary	Additional Assessed	PRI 4,5,6
Private			

SG 12	Mandatory	Core Assessed	PRI 4
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SG 12.1	Indicate whether your organisation uses investment consultants.
	<input type="checkbox"/> Yes, we use investment consultants <input checked="" type="checkbox"/> No, we do not use investment consultants.

SG 13	Mandatory	Descriptive	PRI 1
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SG 13.1	Indicate whether the organisation carries out scenario analysis and/or modelling, and if it does, provide a description of the scenario analysis (by asset class, sector, strategic asset allocation, etc.).
	<input type="checkbox"/> Yes, in order to assess future ESG factors <input checked="" type="checkbox"/> Yes, in order to assess future climate-related risks and opportunities
	Describe
	We are in the process of considering how we implement climate analysis within our investments and have done preliminary research. We also discuss scenarios with companies in our active ownership activities.
	<input type="checkbox"/> No, our organisation does not currently carry out scenario analysis and/or modelling

SG 13.2	Indicate if your organisation considers ESG issues in strategic asset allocation and/or allocation of assets between sectors or geographic markets.
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	We do the following
	<input checked="" type="checkbox"/> Allocation between asset classes <input type="checkbox"/> Determining fixed income duration <input checked="" type="checkbox"/> Allocation of assets between geographic markets <input checked="" type="checkbox"/> Sector weightings <input type="checkbox"/> Other, specify <input type="checkbox"/> We do not consider ESG issues in strategic asset allocation

SG 13 CC	Mandatory to Report, Voluntary to Disclose	Descriptive	General
Private			

SG 14	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1
Private			

SG 14 CC	Voluntary		General
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SG 15	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1
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Private

SG 16	Mandatory	Descriptive	General
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SG 16.1 Describe how you address ESG issues for internally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.

Asset Class	Describe what processes are in place and the outputs or outcomes achieved
Fixed income - Securitised	The securitised fixed income investment team abides by the organisation's approach to managing risk. This effectively means that managers will monitor operational and business risks, and risk at the individual security level, including from ESG factors.
Infrastructure	Our team acknowledges that ESG issues can impact the long term performance and returns of our portfolios. As a result, we consider ESG issues throughout the investment process.
Cash	ESG issues are considered throughout the investment process, as ESG issues can impact the long-term performance and returns of money market portfolios. An extensive engagement program as well as a dedicated ESG weighting strategy has been developed.
Other (1) [as defined in Organisational Overview module]	ESG issues are considered throughout the investment process, as ESG issues can impact the long-term performance and returns of money market portfolios. An extensive engagement program as well as a dedicated ESG weighting strategy has been developed.

SG 17	Mandatory	Descriptive	General
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SG 17.1 Describe how you address ESG issues for externally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.

Asset Class	Describe what processes are in place and the outputs or outcomes achieved
Listed equities - ESG incorporation	We incorporate a number of ESG-related questions during the manager selection process. These include requests for information about governance and RI policies; the incorporation of ESG into investment processes; case studies of successful engagement; and signatory status to standards such as PRI and UNGC.
Listed equities - engagement	We incorporate a number of ESG-related questions during the manager selection process. These include requests for information about governance and RI policies; the incorporation of ESG into investment processes; case studies of successful engagement; and signatory status to standards such as PRI and UNGC.
Listed equities - (proxy) voting	We incorporate a number of ESG-related questions during the manager selection process. These include requests for information about governance and RI policies; the incorporation of ESG into investment processes; case studies of successful engagement; and signatory status to standards such as PRI and UNGC.
Fixed income - SSA	We incorporate a number of ESG-related questions during the manager selection process. These include requests for information about governance and RI policies; the incorporation of ESG into investment processes; case studies of successful engagement; and signatory status to standards such as PRI and UNGC.
Fixed income - Corporate (financial)	We incorporate a number of ESG-related questions during the manager selection process. These include requests for information about governance and RI policies; the incorporation of ESG into investment processes; case studies of successful engagement; and signatory status to standards such as PRI and UNGC.
Fixed income - Corporate (non-financial)	We incorporate a number of ESG-related questions during the manager selection process. These include requests for information about governance and RI policies; the incorporation of ESG into investment processes; case studies of successful engagement; and signatory status to standards such as PRI and UNGC.
Private equity	The Private Equity business actively engages with its underlying fund managers (General Partners or GPs) to encourage them to develop responsible investment policies that address ESG risks, both during the pre-investment due diligence phase and throughout their tenure as shareholders. The team regular surveys all General Partners (GPs) on their approach to integrating ESG factors and publishes client reports on the outcomes of this process.
Property	BMO REP incorporates a number of ESG-related questions during the manager selection process. These include requests for information about governance and RI policies and the incorporation of ESG into investment processes.
Infrastructure	We incorporate a number of ESG-related questions during the manager selection process. These include requests for information about governance and RI policies; the incorporation of ESG into investment processes; case studies of successful engagement; and signatory status to standards such as PRI and UNGC.
Cash	We incorporate a number of ESG-related questions during the manager selection process. These include requests for information about governance and RI policies; the incorporation of ESG into investment processes; case studies of successful engagement; and signatory status to standards such as PRI and UNGC.

Other (1) [as defined in Organisational Overview module]	We incorporate a number of ESG-related questions during the manager selection process. These include requests for information about governance and RI policies; the incorporation of ESG into investment processes; case studies of successful engagement; and signatory status to standards such as PRI and UNGC.
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SG 18	Voluntary	Descriptive	General
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SG 18.1 Indicate whether any specific features of your approach to responsible investment are particularly innovative.

Yes

SG 18.2 Describe any specific features of your approach to responsible investment that you believe are particularly innovative.

New ways of delivering information or reports to clients: We have developed the possibility to report on how our engagement contributes impact to the SDGs, not only on goal but down to target level.

Measuring impact of engagement: In some of our engagement projects we have started to ask whether other investors have spoken about certain topics or encouraged improvements in certain areas with the company before. If not, and within a reasonable timeframe changes have occurred, we are able to allocate respective impact from the investor side to us.

New partnerships: To build the business case for living wages and adequate social benefits we are partnering with a disclosure initiative, a development agency, various companies, and a consultancy to develop a methodology that helps to define and perform social opportunities scenario analysis, i.e. combining social data with financial analysis.

No

SG 19	Mandatory	Core Assessed	PRI 2, 6
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SG 19.1 Indicate whether your organisation typically discloses asset class specific information proactively. Select the frequency of the disclosure to clients/beneficiaries and the public, and provide a URL to the public information.

Listed equity - Incorporation

Do you disclose?

- We do not proactively disclose it to the public and/or clients/beneficiaries
- We disclose to clients/beneficiaries only.
- We disclose it publicly

The information disclosed to clients/beneficiaries is the same

- Yes
- No

Disclosure to public and URL	Disclosure to clients/beneficiaries
<p>Disclosure to public and URL</p> <ul style="list-style-type: none"> <input checked="" type="radio"/> Broad approach to ESG incorporation <input type="radio"/> Detailed explanation of ESG incorporation strategy used 	<p>Disclosure to clients/beneficiaries</p> <ul style="list-style-type: none"> <input type="radio"/> Broad approach to ESG incorporation <input checked="" type="radio"/> Detailed explanation of ESG incorporation strategy used
Annually	Quarterly or more frequently
https://www.bmogam.com/responsible-investment-2019-review/	

Listed equity - Engagement

Do you disclose?

- We do not disclose to either clients/beneficiaries or the public.
- We disclose to clients/beneficiaries only.
- We disclose to the public

The information disclosed to clients/beneficiaries is the same

- Yes
- No

Disclosure to public and URL	Disclosure to clients/beneficiaries

Disclosure to public and URL	Disclosure to clients/beneficiaries
<input checked="" type="checkbox"/> Details on the overall engagement strategy <input type="checkbox"/> Details on the selection of engagement cases and definition of objectives of the selections, priorities and specific goals <input checked="" type="checkbox"/> Number of engagements undertaken <input checked="" type="checkbox"/> Breakdown of engagements by type/topic <input checked="" type="checkbox"/> Breakdown of engagements by region <input type="checkbox"/> An assessment of the current status of the progress achieved and outcomes against defined objectives <input checked="" type="checkbox"/> Examples of engagement cases <input type="checkbox"/> Details on eventual escalation strategy taken after the initial dialogue has been unsuccessful (i.e. filing resolutions, issuing a statement, voting against management, divestment etc.) <input type="checkbox"/> Details on whether the provided information has been externally assured <input checked="" type="checkbox"/> Outcomes that have been achieved from the engagement <input type="checkbox"/> Other information	<input checked="" type="checkbox"/> Details on the overall engagement strategy <input checked="" type="checkbox"/> Details on the selection of engagement cases and definition of objectives of the selections, priorities and specific goals <input checked="" type="checkbox"/> Number of engagements undertaken <input checked="" type="checkbox"/> Breakdown of engagements by type/topic <input checked="" type="checkbox"/> Breakdown of engagements by region <input checked="" type="checkbox"/> An assessment of the current status of the progress achieved and outcomes against defined objectives <input checked="" type="checkbox"/> Examples of engagement cases <input checked="" type="checkbox"/> Details on eventual escalation strategy taken after the initial dialogue has been unsuccessful (i.e. filing resolutions, issuing a statement, voting against management, divestment etc.) <input type="checkbox"/> Details on whether the provided information has been externally assured <input checked="" type="checkbox"/> Outcomes that have been achieved from the engagement <input type="checkbox"/> Other information
Annually	Quarterly or more frequently
https://www.bmogam.com/responsible-investment-2019-review/	

Listed equity – (Proxy) Voting

Do you disclose?

We do not disclose to either clients/beneficiaries or the public.
 We disclose to clients/beneficiaries only.
 We disclose to the public

The information disclosed to clients/beneficiaries is the same

Yes
 No

Disclosure to public and URL
<p>Disclosure to public and URL</p> <input checked="" type="radio"/> Disclose all voting decisions <input type="radio"/> Disclose some voting decisions <input type="radio"/> Only disclose abstentions and votes against management
Quarterly or more frequently
http://vds-staging.issproxy.com/SearchPage.php?CustomerID=3660&StagingPassword=TRITenpXpo

Fixed income

Do you disclose?

We do not disclose to either clients/beneficiaries or the public.
 We disclose to clients/beneficiaries only.
 We disclose to the public

The information disclosed to clients/beneficiaries is the same

Yes
 No

Disclosure to public and URL	Disclosure to clients/beneficiaries
<p>Disclosure to public and URL</p> <input checked="" type="radio"/> Broad approach to RI incorporation <input type="radio"/> Detailed explanation of RI incorporation strategy used	<p>Disclosure to clients/beneficiaries</p> <input type="radio"/> Broad approach to RI incorporation <input checked="" type="radio"/> Detailed explanation of RI incorporation strategy used
Less frequently than annually	Annually

<https://www.bmogam.com/responsible-investment-2019-review/>
<https://www.bmogam.com/wp-content/uploads/2020/01/esg-in-fixed-income.pdf>

Private equity

Do you disclose?

- We do not disclose to either clients/beneficiaries or the public.
- We disclose to clients/beneficiaries only.
- We disclose to the public

Disclosure to clients/beneficiaries

Disclosure to clients/beneficiaries

- ESG information in relationship to our pre-investment activities
- ESG information in relationship to our post-investment monitoring and ownership activities
- Information on our portfolio companies' ESG performance
- Other

Quarterly or more frequently

Property

Do you disclose?

- We do not disclose to either clients/beneficiaries or the public.
- We disclose to clients/beneficiaries only.
- We disclose to the public

The information disclosed to clients/beneficiaries is the same

- Yes
- No

Disclosure to public and URL	Disclosure to clients/beneficiaries
<p>Disclosure to public and URL</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> ESG information on how you select property investments <input checked="" type="checkbox"/> ESG information on how you monitor and manage property investments <input type="checkbox"/> Information on your property investments' ESG performance <input type="checkbox"/> Other 	<p>Disclosure to clients/beneficiaries</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> ESG information on how you select property investments <input checked="" type="checkbox"/> ESG information on how you monitor and manage property investments <input checked="" type="checkbox"/> Information on your property investments' ESG performance <input type="checkbox"/> Other
Annually	Quarterly or more frequently
https://www.bmorep.com/wp-content/uploads/2018/10/cm16109-bmo-rep-responsible-property-investment.pdf https://www.bmogam.com/responsible-investment-2019-review/	

Hedge Funds

Do you disclose?

- We do not disclose to either clients/beneficiaries or the public.
- We disclose to clients/beneficiaries only.
- We disclose to the public

SG Checks

Checks

If there are any messages below, please review them before continuing. If there are no messages below, please save this page and continue.

LEI 01	Mandatory	Gateway	PRI 1
LEI 01.1	Indicate which ESG incorporation strategy and/or combination of strategies you apply to your actively managed listed equities; and the breakdown of your actively managed listed equities by strategy or combination of strategies.		
<input type="checkbox"/> Screening alone (i.e., not combined with any other strategies) <input type="checkbox"/> Thematic alone (i.e., not combined with any other strategies) <input checked="" type="checkbox"/> Integration alone (i.e., not combined with any other strategies)			
		Percentage of active listed equity to which the strategy is applied – you may estimate +/- 5%	96%
<input checked="" type="checkbox"/> Screening and integration strategies			
		Percentage of active listed equity to which the strategy is applied – you may estimate +/- 5%	3%
<input checked="" type="checkbox"/> Thematic and integration strategies			
		Percentage of active listed equity to which the strategy is applied – you may estimate +/- 5%	0.5%
<input checked="" type="checkbox"/> Screening and thematic strategies			
		Percentage of active listed equity to which the strategy is applied – you may estimate +/- 5%	0.5%
<input type="checkbox"/> All three strategies combined <input type="checkbox"/> We do not apply incorporation strategies			
LEI 02	Voluntary	Additional Assessed	PRI 1
Private			
LEI 03	Voluntary	Additional Assessed	PRI 1
Private			
LEI 04	Mandatory	Descriptive	PRI 1
LEI 04.1	Indicate and describe the type of screening you apply to your internally managed active listed equities.		
<input checked="" type="checkbox"/> Negative/exclusionary screening			
<input checked="" type="checkbox"/> Product <input checked="" type="checkbox"/> Activity <input checked="" type="checkbox"/> Sector <input type="checkbox"/> Country/geographic region <input checked="" type="checkbox"/> Environmental and social practices and performance <input type="checkbox"/> Corporate governance			
		Description	
<p>Our range of screened funds has a set of key negative criteria, including for tobacco, gambling, harmful or offensive materials, weapons, nuclear power, and unnecessary exploitation of animals. Additionally, these funds will exclude from their investment universe companies that have consistently poor ESG practices and performance.</p> <p>https://www.bmogam.com/wp-content/uploads/2020/02/responsible-investment-strategies-summary-criteria.pdf</p>			
<input type="checkbox"/> Positive/best-in-class screening			
<input checked="" type="checkbox"/> Norms-based screening			
<input checked="" type="checkbox"/> UN Global Compact Principles <input type="checkbox"/> The UN Guiding Principles on Business and Human Rights <input checked="" type="checkbox"/> International Labour Organization Conventions <input type="checkbox"/> United Nations Convention Against Corruption <input type="checkbox"/> OECD Guidelines for Multinational Enterprises <input type="checkbox"/> Other, specify			
		Description	
<p>We do perform UN GC compliance assessments, and in case breaches are identified an engagement with the company will be effected (unless already taking place).</p> <p>In our responsible strategies range we exclude companies with repeated and significant violations or fines related to the below where there has been inadequate remedial action: • Equal opportunities • Diversity • Health and safety Exclude companies with no evidence of response to repeated allegations of breaches of core ILO conventions on: child labour in its own operations; child labour in its supply chain; forced labour in its operations; forced labour in its supply chain; and international labour standards. https://www.bmogam.com/wp-content/uploads/2020/02/responsible-investment-strategies-summary-criteria.pdf</p>			
LEI 04.2	Describe how you notify clients and/or beneficiaries when changes are made to your screening criteria.		
<p>The Responsible Investment team leads the development and implementation of screening criteria for our range of screened funds. We seek advice from an external advisory body, the Responsible Investment Advisory Council. The Council comprises six experts drawn from a diverse range of fields that meets quarterly to discuss potential changes to the ethical and sustainability criteria and developments in the sustainable investment market. We notify clients on an ongoing basis, via newsletters and through our website about significant changes to the criteria. We have also undertaken consultations with clients as</p>			

we modify or incorporate criteria on issues they assess as particularly relevant

LEI 05	Mandatory	Core Assessed	PRI 1					
LEI 05.1	Indicate which processes your organisation uses to ensure ESG screening is based on robust analysis.							
	<input checked="" type="checkbox"/> Comprehensive ESG research is undertaken or sourced to determine companies' activities and products. <input checked="" type="checkbox"/> Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies. <input checked="" type="checkbox"/> External research and data used to identify companies to be excluded/included is subject to internal audit by ESG/RI staff, the internal audit function or similar. <input checked="" type="checkbox"/> Third-party ESG ratings are updated regularly to ensure that portfolio holdings comply with fund policies. <input checked="" type="checkbox"/> Trading platforms blocking / restricting flagged securities on the black list. <input checked="" type="checkbox"/> A committee, body or similar with representatives independent of the individuals who conduct company research reviews some or all screening decisions. <input checked="" type="checkbox"/> A periodic review of internal research is carried out. <input checked="" type="checkbox"/> Review and evaluation of external research providers. <input type="checkbox"/> Other; specify <input type="checkbox"/> None of the above							
LEI 05.2	Indicate the proportion of your actively managed listed equity portfolio that is subject to comprehensive ESG research as part your ESG screening strategy.							
	<input type="radio"/> <10% <input checked="" type="radio"/> 10-50% <input type="radio"/> 51-90% <input type="radio"/> >90%							
LEI 05.3	Indicate how frequently third party ESG ratings are updated for screening purposes.							
	<input checked="" type="radio"/> Quarterly or more frequently <input type="radio"/> Bi-Annually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually							
LEI 05.4	Indicate how frequently you review internal research that builds your ESG screens.							
	<input checked="" type="radio"/> Quarterly or more frequently <input type="radio"/> Bi-Annually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually							
LEI 06	Voluntary	Additional Assessed	PRI 1					
Private								
LEI 07	Mandatory	Descriptive	PRI 1					
LEI 07.1	Indicate the type of sustainability thematic funds or mandates your organisation manages.							
	<input type="checkbox"/> Environmentally themed funds <input type="checkbox"/> Socially themed funds <input checked="" type="checkbox"/> Combination of themes							
LEI 08	Mandatory	Core Assessed	PRI 1					
LEI 08.1	Indicate the proportion of actively managed listed equity portfolios where E, S and G factors are systematically researched as part of your investment analysis.							
	<table border="1"> <thead> <tr> <th>ESG issues</th> <th>Proportion impacted by analysis</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Environmental</td> <td>Environmental</td> </tr> <tr> <td> <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90% </td> </tr> </tbody> </table>			ESG issues	Proportion impacted by analysis	Environmental	Environmental	<input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90%
ESG issues	Proportion impacted by analysis							
Environmental	Environmental							
	<input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90%							

Social	Social	
	<input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90%	
Corporate Governance	Corporate Governance	
	<input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> 51-90% <input checked="" type="radio"/> >90%	

LEI 09	Mandatory	Core Assessed	PRI 1
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LEI 09.1 Indicate which processes your organisation uses to ensure ESG integration is based on robust analysis.

- Comprehensive ESG research is undertaken or sourced to determine companies' activities and products
- Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- Third-party ESG ratings are updated regularly
- A periodic review of the internal research is carried out
- Structured, regular ESG specific meetings between responsible investment staff and the fund manager or within the investments team
- ESG risk profile of a portfolio against benchmark
- Analysis of the impact of ESG factors on investment risk and return performance
- Other; specify
- None of the above

LEI 09.2 Indicate the proportion of your actively managed listed equity portfolio that is subject to comprehensive ESG research as part your integration strategy.

- <10%
- 10-50%
- 51-90%
- >90%

LEI 09.3 Indicate how frequently third party ESG ratings that inform your ESG integration strategy are updated.

- Quarterly or more frequently
- Bi-Annually
- Annually
- Less frequently than annually

LEI 09.4 Indicate how frequently you review internal research that builds your ESG integration strategy.

- Quarterly or more frequently
- Bi-Annually
- Annually
- Less frequently than annually

LEI 09.5 Describe how ESG information is held and used by your portfolio managers.

- ESG information is held within centralised databases or tools, and it is accessible by all relevant staff
- ESG information or analysis is a standard section or aspect of all company research notes or industry/sector analysis generated by investment staff
- Systematic records are kept that capture how ESG information and research were incorporated into investment decisions
- Other; specify
- None of the above

LEI 10	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 1
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Private

LEI 11	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1
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Private

LEI Checks			Checks
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If there are any messages below, please review them before continuing. If there are no messages below, please save this page and continue.

LEA 01.1 Indicate whether your organisation has an active ownership policy (includes engagement and/or voting).

Yes

LEA 01.2 Attach or provide a URL to your active ownership policy.

Attachment provided:

URL provided:

<http://WWW.BMOGAM.COM/GB-EN/INTERMEDIARY/WP-CONTENT/UPLOADS/2019/05/CORPORATE-GOVERNANCE-GUIDELINES.PDF>

LEA 01.3 Indicate what your active engagement policy covers:

General approach to Active Ownership

- Conflicts of interest
- Alignment with national stewardship code requirements
- Assets/funds covered by active ownership policy
- Expectations and objectives
- Engagement approach

Engagement

- ESG issues
 - Prioritisation of engagement
 - Methods of engagement
 - Transparency of engagement activities
 - Due diligence and monitoring process
 - Insider information
 - Escalation strategies
 - Service Provider specific criteria
 - Other, (specify)
- (Proxy) voting approach

Voting

- ESG issues
 - Prioritisation and scope of voting activities
 - Methods of voting
 - Transparency of voting activities
 - Regional voting practice approaches
 - Filing or co-filing resolutions
 - Company dialogue pre/post-vote
 - Decision-making processes
 - Securities lending processes
 - Other, (specify)
- Other
- None of the above

No

LEA 01.4 Do you outsource any of your active ownership activities to service providers?

Yes

No

LEA 01.6 Additional information [optional]

We are committed to the good stewardship of our clients' investments through our engagement, voting and public policy activities.

Engagement and public policy:

We consider engagement as a cornerstone of our responsible investment approach. Our primary purpose in engagement is to underpin long-term returns and to mitigate risk. We also believe that by encouraging better management of ESG issues by our investee companies we are contributing to a more resilient global economy, which will ultimately underpin our clients' long-term prosperity and security. Our preferred approach to engagement is to use constructive, confidential dialogue, typically working one-to-one with companies, but also taking a collaborative approach where this has more impact and is in line with our objectives. We engage at different levels within companies, depending on the nature of our objectives, including board level, executive management and operational specialists. We will encourage improvement in ESG management should we deem existing practices insufficient to respond to ESG risks and/or opportunities.

Whilst dialogue with companies is essential, we also recognise that action by governments or regulatory intervention is needed to create a level playing field and achieve meaningful results. We contribute to standard setting in public policy, where we seek to be a constructive investor voice. Recent examples include consultations on responsible investment policies, codes and regulation, working with global stock exchanges on listing standards, and advocating

policies that raise the bar for the management of ESG risks faced by the companies in which we invest

Voting:

It is our policy to vote at all shareholder meetings on behalf of our investment clients, and third-party clients where voting is requested. We apply a consistent philosophy and approach to corporate governance and the exercising of voting rights. This approach is embodied in our Global Corporate Governance Guidelines, which are a standard set of guidelines. These are reviewed annually to address developments in international governance practices, and are based on overarching principles that we believe constitute good corporate governance practice.

LEA 02	Mandatory	Core Assessed	PRI 1,2,3
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LEA 02.1 Indicate the method of engagement, giving reasons for the interaction.

Type of engagement	Reason for interaction
Individual / Internal staff engagements	<input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input type="checkbox"/> We do not engage via internal staff
Collaborative engagements	<input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input type="checkbox"/> We do not engage via collaborative engagements
Service provider engagements	<input type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> We do not engage via service providers

LEA 03	Mandatory	Core Assessed	PRI 2
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LEA 03.1 Indicate whether your organisation has a formal process for identifying and prioritising engagements.

✓ Yes

LEA 03.2 Indicate the criteria used to identify and prioritise engagements for each type of engagement.

Type of engagement	Criteria used to identify/prioritise engagements
Individual / Internal staff engagements	Individual / Internal staff engagements
	<input checked="" type="checkbox"/> Geography/market of the companies <input checked="" type="checkbox"/> Materiality of the ESG factors <input checked="" type="checkbox"/> Exposure (size of holdings) <input checked="" type="checkbox"/> Responses to ESG impacts that have already occurred <input type="checkbox"/> Responses to divestment pressure <input checked="" type="checkbox"/> Consultation with clients/beneficiaries <input checked="" type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input checked="" type="checkbox"/> Follow-up from a voting decision <input checked="" type="checkbox"/> Client request <input checked="" type="checkbox"/> Breaches of international norms <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our individual engagements

	Collaborative engagements
Collaborative engagements	<input checked="" type="checkbox"/> Potential to enhance knowledge of ESG issues through other investors <input checked="" type="checkbox"/> Ability to have greater impact on ESG issues <input checked="" type="checkbox"/> Ability to add value to the collaboration <input checked="" type="checkbox"/> Geography/market of the companies targeted by the collaboration <input checked="" type="checkbox"/> Materiality of the ESG factors addressed by the collaboration <input checked="" type="checkbox"/> Exposure (size of holdings) to companies targeted by the collaboration <input checked="" type="checkbox"/> Responses to ESG impacts addressed by the collaboration that have already occurred <input type="checkbox"/> Responses to divestment pressure <input checked="" type="checkbox"/> Follow-up from a voting decision <input checked="" type="checkbox"/> Alleviate the resource burden of engagement <input checked="" type="checkbox"/> Consultation with clients/beneficiaries <input checked="" type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our collaborative engagement providers
<input type="radio"/> No	

LEA 04	Mandatory	Core Assessed	PRI 2
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LEA 04.1	Indicate whether you define specific objectives for your organisation's engagement activities.
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Individual / Internal staff engagements	<input checked="" type="checkbox"/> All engagement activities <input type="radio"/> Majority of engagement activities <input type="radio"/> Minority of engagement activities <input type="radio"/> We do not define specific objectives for engagement activities carried out by internal staff
Collaborative engagements	<input checked="" type="checkbox"/> All engagement activities <input type="radio"/> Majority of engagement activities <input type="radio"/> Minority of engagement activities <input type="radio"/> We do not define specific objectives for engagement activities carried out through collaboration

LEA 05	Mandatory	Core Assessed	PRI 2
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LEA 05.1	Indicate whether you monitor and/or review engagement outcomes.
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Individual / Internal staff engagements	<input checked="" type="checkbox"/> Yes, in all cases <input type="radio"/> Yes, in a majority of cases <input type="radio"/> Yes, in a minority of cases <input type="radio"/> We do not monitor, or review engagement outcomes when the engagement is carried out by our internal staff.
Collaborative engagements	<input checked="" type="checkbox"/> Yes, in all cases <input type="radio"/> Yes, in a majority of cases <input type="radio"/> Yes, in a minority of cases <input type="radio"/> We do not monitor, or review engagement outcomes when the engagement is carried out through collaboration.

LEA 05.2	Indicate whether you do any of the following to monitor and/or review the progress of engagement activities.
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Individual / Internal staff engagements	<input checked="" type="checkbox"/> Define timelines/milestones for your objectives <input checked="" type="checkbox"/> Track and/or monitor progress against defined objectives and/or KPIs <input checked="" type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input checked="" type="checkbox"/> Revisit and, if necessary, revise objectives on a continuous basis <input type="checkbox"/> Other; specify
Collaborative engagements	<input checked="" type="checkbox"/> Define timelines/milestones for your objectives <input checked="" type="checkbox"/> Track and/or monitor progress against defined objectives and/or KPIs <input checked="" type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input checked="" type="checkbox"/> Revisit and, if necessary, revise objectives on a continuous basis <input type="checkbox"/> Other; specify

LEA 06.1 Indicate whether your organisation has an escalation strategy when engagements are unsuccessful.

Yes

LEA 06.2 Indicate the escalation strategies used at your organisation following unsuccessful engagements.

- Collaborating with other investors
- Issuing a public statement
- Filing/submitting a shareholder resolution
- Voting against the re-election of the relevant directors
- Voting against the board of directors or the annual financial report
- Submitting nominations for election to the board
- Seeking legal remedy / litigation
- Reducing exposure (size of holdings)
- Divestment
- Other; specify

No

LEA 07.1 Indicate whether insights gained from your organisation's engagements are shared with investment decision-makers.

Type of engagement	Insights shared
Individual / Internal staff engagements	<input checked="" type="radio"/> Yes, systematically <input type="radio"/> Yes, occasionally <input type="radio"/> No
Collaborative engagements	<input checked="" type="radio"/> Yes, systematically <input type="radio"/> Yes, occasionally <input type="radio"/> No

LEA 07.2 Indicate the practices used to ensure that information and insights gained through engagements are shared with investment decision-makers.

- Involving investment decision-makers when developing an engagement programme
- Holding investment team meetings and/or presentations
- Using IT platforms/systems that enable data sharing
- Internal process that requires portfolio managers to re-balance holdings based on interaction and outcome levels
- Other; specify
- None

LEA 07.3 Indicate whether insights gained from your organisation's engagements are shared with your clients/beneficiaries.

Type of engagement	Insights shared
Individual/Internal staff engagements	<input checked="" type="radio"/> Yes, systematically <input type="radio"/> Yes, occasionally <input type="radio"/> No
Collaborative engagements	<input checked="" type="radio"/> Yes, systematically <input type="radio"/> Yes, occasionally <input type="radio"/> No

LEA 08.1 Indicate whether you track the number of your engagement activities.

Type of engagement	Tracking engagements
Individual/Internal staff engagements	<input checked="" type="radio"/> Yes, we track the number of our engagements in full <input type="radio"/> Yes, we partially track the number of our engagements <input type="radio"/> We do not track

Collaborative engagements	<input checked="" type="radio"/> Yes, we track the number of collaborative engagements in full <input type="radio"/> Yes, we partially track the number of our collaborative engagements <input type="radio"/> We do not track
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LEA 09	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 2
<i>Private</i>			
LEA 10	Voluntary	Additional Assessed	PRI 2
<i>Private</i>			
LEA 11	Voluntary	Descriptive	PRI 2
<i>Private</i>			
LEA 12	Mandatory	Descriptive	PRI 2

LEA 12.1	Indicate how you typically make your (proxy) voting decisions.
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	Approach
<input type="radio"/> We use our own research or voting team and make voting decisions without the use of service providers. <input checked="" type="radio"/> We hire service providers who make voting recommendations and/or provide research that we use to guide our voting decisions.	
	Based on
<input type="radio"/> The service-provider voting policy we sign off on <input checked="" type="radio"/> Our own voting policy <input type="radio"/> Our clients' requests or policies <input type="radio"/> Other (explain)	
<input type="radio"/> We hire service providers who make voting decisions on our behalf, except in some pre-defined scenarios where we review and make voting decisions. <input type="radio"/> We hire service providers who make voting decisions on our behalf.	

LEA 12.2	Provide an overview of how you ensure that your agreed-upon voting policy is adhered to, giving details of your approach when exceptions to the policy are made.
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Our voting process uses a risk-based approach to achieve high quality voting while delivering comprehensive coverage of a wide portfolio of stocks. We deploy our specialist governance team on the most complex and sensitive cases, and work with our voting service provider to deliver voting on the more simple, routine votes through the careful and consistent application of detailed in-house voting policies.

Voters carry out daily and weekly vote audits to ensure that each step in the voting process is followed and that votes are cast in accordance with our policies. In the case of standard votes, our proxy voting advisor will cast the votes in accordance with the relevant BMO Global Asset Management governance policy with oversight from relevant individuals.

Exceptions to the policy can be made, as follows:

If an institutional client instructs us to vote differently from our standard approach, we vote their securities as specifically requested and continue to follow our standard approach for our other clients.

In executing votes, where a company puts forward a strong case for not complying with our policy/guidelines, we consider this and adjust our vote if we believe the company is still acting in the best interests of shareholders.

When we become aware of any vote that presents a conflict of interest, we must vote in the best interests of our clients:

- Voting at a client's meeting: We could vote at a company meeting where the company is a client of, or has another type of business relationship with, BMO Financial Group. We manage this conflict by treating all our clients equally in our voting activities. We do not alter our position on a vote due to a business relationship that a company may have with BMO Financial Group. Unless an institutional client instructs us otherwise, we apply our CGG to all client portfolios in a manner that considers our clients' respective investment objectives and best interests.
- Voting at a BMO meeting (including meetings of investment funds that BMO Global Asset Management manages) or where BMO is a party: We could vote at a company meeting of Bank of Montreal, any of its affiliates, or an investment fund that BMO Global Asset Management manages. We could also vote at a company meeting relating to a corporate action (for example, a merger or acquisition) involving the company (or any of its affiliates) or a member of BMO Financial Group. We manage this conflict by using ISS as our proxy voting administrator, to auto-execute all relevant votes in accordance with the ISS proxy voting policy. ISS executes votes without our further guidance, except where we have specific instructions from a client. This can result, for example, in our votes not supporting specific resolutions at a company meeting of Bank of Montreal. However, for our investment funds that are subject to Canadian securities laws that hold securities of an affiliated investment fund, we will not vote the top fund's holdings in the underlying fund. We may instead arrange for investors in the top fund to vote the securities of the underlying fund. In light of the cost and complexity in doing so, this is not our typical practice.
- Voting at a meeting involving a BMO Global Asset Management officer, director or employee: We could vote at a company meeting where an officer, director or employee of BMO Global Asset Management is nominated for election or serves on the board of that company. We manage this conflict by using this and other BMO policies specifically relating to BMO employees with relationships with companies. For example, BMO's Code of Conduct requires our employees to declare and disclose their outside business interests. In cases where there is a significant conflict, we may determine that it is inappropriate for such employees to direct the voting at meetings of certain companies in which our clients invest. We also manage this conflict the same way as we do for company meetings of Bank of Montreal: we use ISS, as our proxy voting administrator, to auto-execute the vote in accordance with the ISS proxy voting policy, without our further guidance, except where we have specific instructions from a client.
- Voting to favour one client over another: We could vote on a matter at a company meeting with a potential voting outcome that would favour one of our clients over another. We manage this conflict by treating all clients equally in our voting activities. Unless an institutional client instructs us otherwise, we apply our corporate governance guidelines to all client portfolios in a manner that considers our clients' respective investment objectives and best interests. This could result in our voting on a matter the same way or differently for different clients.
- Voting to favour one portfolio manager over another: We could vote at a company meeting where different BMO Global Asset Management portfolio managers prefer different voting outcomes. We manage this conflict by having an internal consultation process where portfolio managers can advocate for their views through our Proxy Working Group (PWG). Its members are experts in governance and sustainable investment within BMO Global Asset Management. The Global Investment Committee (GIC) oversees the PWG. The PWG and the GIC approve the corporate governance

guidelines annually.

This internal consultation process allows divergent views to be considered, but does not occur at the expense of the best interest of our clients. We treat all clients equally in our voting activities. Unless an institutional client instructs us otherwise, we apply our guidelines to all client portfolios in a manner that considers our clients' respective investment objectives and best interests. This could result in our voting on a matter the same way or differently for different clients.

LEA 14	Voluntary	Additional Assessed	PRI 2
Private			
LEA 15	Mandatory	Descriptive	PRI 2
LEA 15.1	Indicate the proportion of votes participated in within the reporting year in which where you or the service providers acting on your behalf raised concerns with companies ahead of voting.		
<input type="radio"/> 100% <input type="radio"/> 99-75% <input checked="" type="radio"/> 74-50% <input type="radio"/> 49-25% <input type="radio"/> 24-1% <input type="radio"/> Neither we nor our service provider(s) raise concerns with companies ahead of voting			
LEA 15.2	Indicate the reasons for raising your concerns with these companies ahead of voting.		
<input checked="" type="checkbox"/> Vote(s) concerned selected markets <input checked="" type="checkbox"/> Vote(s) concerned selected sectors <input checked="" type="checkbox"/> Vote(s) concerned certain ESG issues <input checked="" type="checkbox"/> Vote(s) concerned companies exposed to controversy on specific ESG issues <input checked="" type="checkbox"/> Vote(s) concerned significant shareholdings <input checked="" type="checkbox"/> Client request <input type="checkbox"/> Other			
LEA 16	Mandatory	Core Assessed	PRI 2
LEA 16.1	Indicate the proportion of votes where you, and/or the service provider(s) acting on your behalf, communicated the rationale to companies for abstaining or voting against management recommendations. Indicate this as a percentage out of all eligible votes.		
<input type="radio"/> 100% <input checked="" type="radio"/> 99-75% <input type="radio"/> 74-50% <input type="radio"/> 49-25% <input type="radio"/> 24-1% <input type="radio"/> We do not communicate the rationale to companies <input type="radio"/> Not applicable because we and/or our service providers did not abstain or vote against management recommendations			
LEA 16.2	Indicate the reasons why your organisation would communicate to companies, the rationale for abstaining or voting against management recommendations.		
<input checked="" type="checkbox"/> Vote(s) concern selected markets <input checked="" type="checkbox"/> Vote(s) concern selected sectors <input checked="" type="checkbox"/> Vote(s) concern certain ESG issues <input checked="" type="checkbox"/> Vote(s) concern companies exposed to controversy on specific ESG issues <input checked="" type="checkbox"/> Vote(s) concern significant shareholdings <input checked="" type="checkbox"/> Client request <input type="checkbox"/> Other			
LEA 16.3	In cases where your organisation does communicate the rationale for abstaining or voting against management recommendations, indicate whether this rationale is made public.		
<input checked="" type="radio"/> Yes <input type="radio"/> No			
LEA 16.4	Additional information. [Optional]		
All of BMO GAM's voting records are accessible here: http://vds-staging.issproxy.com/SearchPage.php?CustomerID=3660&StagingPassword=TRITenXpo			
LEA 17	Mandatory	Core Assessed	PRI 2
LEA 17.1	For listed equities in which you or your service provider have the mandate to issue (proxy) voting instructions, indicate the percentage of votes cast during the reporting year.		
<input checked="" type="checkbox"/> We do track or collect this information			
		Votes cast (to the nearest 1%)	

98%

Specify the basis on which this percentage is calculated

- Of the total number of ballot items on which you could have issued instructions
- Of the total number of company meetings at which you could have voted
- Of the total value of your listed equity holdings on which you could have voted
- We do not track or collect this information

LEA 17.2 Explain your reason(s) for not voting on certain holdings

- Shares were blocked
- Notice, ballots or materials not received on time
- Missed deadline
- Geographical restrictions (non-home market)
- Cost
- Conflicts of interest
- Holdings deemed too small
- Administrative impediments (e.g., power of attorney requirements, ineligibility due to participation in share placement)
- Client request
- Other (explain)

LEA 18 Voluntary Additional Assessed PRI 2

LEA 18.1 Indicate whether you track the voting instructions that you or your service provider on your behalf have issued.

- Yes, we track this information

LEA 18.2 Of the voting instructions that you and/or third parties on your behalf have issued, indicate the proportion of ballot items that were:

Voting instructions Breakdown as percentage of votes cast

For (supporting) management recommendations	76.4%
Against (opposing) management recommendations	22.16%
Abstentions	1.4%

- No, we do not track this information

LEA 18.3 In cases where your organisation voted against management recommendations, indicate the percentage of companies which you have engaged.

8

LEA 19 Mandatory Core Assessed PRI 2

LEA 19.1 Indicate whether your organisation has a formal escalation strategy following unsuccessful voting.

- Yes
- No

LEA 19.2 Indicate the escalation strategies used at your organisation following abstentions and/or votes against management.

- Contacting the company's board
- Contacting the company's senior management
- Issuing a public statement explaining the rationale
- Initiating individual/collaborative engagement
- Directing service providers to engage
- Reducing exposure (holdings) / divestment
- Other

LEA 20 Voluntary Descriptive PRI 2

Private

LEA 21 Voluntary Descriptive PRI 2

Private

LEA Checks Checks

- If there are any messages below, please review them before continuing. If there are no messages below, please save this page and continue.

FI 01.1 Indicate (1) Which ESG incorporation strategy and/or combination of strategies you apply to your actively managed fixed income investments; and (2) The proportion (+/- 5%) of your total actively managed fixed income investments each strategy applies to.

SSA	Screening alone	0
	Thematic alone	0
	Integration alone	0
	Screening + integration strategies	0
	Thematic + integration strategies	0
	Screening + thematic strategies	0
	All three strategies combined	100
	No incorporation strategies applied	0
	Corporate (financial)	Screening alone
Thematic alone	0	
Integration alone	0	
Screening + integration strategies	0	
Thematic + integration strategies	0	
Screening + thematic strategies	0	
All three strategies combined	100	
No incorporation strategies applied	0	
Corporate (non-financial)	Screening alone	0
Thematic alone	0	
Integration alone	0	
Screening + integration strategies	0	
Thematic + integration strategies	0	
Screening + thematic strategies	0	
All three strategies combined	100	
No incorporation strategies applied	0	

FI 01.2	Describe your reasons for choosing a particular ESG incorporation strategy and how combinations of strategies are used.
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Integration: BMO Global Asset Management believes integration of ESG factors in the fixed income investment process can help enhance investment performance by providing insight into issuers' creditworthiness, bond prices and ultimately portfolio risk.

Screening: Our BMO Global Asset Management EMEA unit offers an ethically-screened fixed income product, the BMO Responsible Bond Fund. This fund aims to maximise returns through investment primarily in investment grade fixed income securities from a set of ethically screened companies. The fund also follows the ESG integration approach that analysts and portfolio managers across the corporate FI desks have in place.

Thematic: As a key investor in the green bond market with ±350 million dollars invested and committed in dedicated green bond strategies we conduct in depth research and pro-active engagement with green bond issuers before and after the issuance to ensure higher standards in the market

FI 14	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 2
<i>Private</i>			
FI 15	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1,2
<i>Private</i>			
FI 16	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1,2
<i>Private</i>			
FI 17	Mandatory to Report, Voluntary to Disclose	Additional Assessed	General
<i>Private</i>			

PE 01	Voluntary	Descriptive	PRI 1-6
Private			
PE 02	Mandatory	Core Assessed	PRI 2
PE 02.1	Indicate whether your organisation's investment activities are guided by a responsible investment policy / follow responsible investment guidelines.		
<input checked="" type="checkbox"/> Our investment activities are guided by a responsible investment policy			
PE 02.2	Describe how your organisation outlines expectations on staff and portfolio companies' approach towards ESG issues in investment activities.		
<p>At BMO GAM, portfolio investment decisions are always made in the best interests of our clients. Supporting these investment decisions is the belief that prudent management of ESG issues can have an important impact on the creation of long-term investor value. Companies that successfully manage their ESG risks, and proactively follow ESG best practices, may experience risk-adjusted outperformance over the longer-term. This belief underpins our commitment to being a responsible investor. Material ESG considerations are integrated into our overall investment process. Our research analysts and fund managers follow a process that considers the potential impact of ESG issues related to investments in our portfolio, and we seek investment partners (GPs) that do the same. This analysis informs our investment process from pre-investment due diligence through to exit. Our investment process includes assessing ESG policies and practices of our investment partners (GPs) for all investment types. For co-investments we also look at ESG risks and opportunities specific to the company, how the company approaches these, and potential to professionalise or enhance this approach through our period of ownership. While the private equity team is responsible for this assessment it looks to leverage the experience of the dedicated Responsible Investment team.</p>			
<input type="checkbox"/> Our investment activities are not guided by a responsible investment policy <input type="checkbox"/> We do not have a responsible investment policy			
PE 03	Mandatory	Core Assessed	PRI 1,4,6
PE 03.1	Indicate if your most recent fund placement documents (private placement memorandums (PPM) or similar) refer to responsible investment.		
<input checked="" type="checkbox"/> Yes			
PE 03.2	Indicate how your most recent fund placement documents (PPM or similar) refer to the following responsible investment:		
<input type="checkbox"/> Policy and commitment to responsible investment <input checked="" type="checkbox"/> Approach to ESG issues in pre-investment processes <input checked="" type="checkbox"/> Approach to ESG issues in post-investment processes <input checked="" type="checkbox"/> Approach to ESG reporting			
PE 03.3	Describe how your organisation refers to responsible investment in fund placement documents (PPMs or similar). [Optional]		
<p>Pre-investment: When evaluating all the investments the Partnership may make, BMO Private Equity will engage with the lead managers and, if appropriate, the proposed investee company's management with regard to environmental, social and corporate governance ("ESG") matters. The investment proposals have a section on ESG matters, where any material risks are highlighted and discussed within the investment committee.</p> <p>Post-investment: Ongoing monitoring of the investments will include continuing to engage with the lead managers and the management of the companies on their management of ESG matters.</p> <p>Reporting: We conduct annual analysis on responsible/ESG investment processes of our investment partners and produce a report discussing responsible investment trends. Most managers are well advanced or have already explicitly incorporated the management of ESG into their processes and where this is less advanced, BMO PE, supported by BMO Global Asset Management (EMEA)'s Responsible Investment team, works with the relevant manager to achieve compliance.</p>			
<input type="checkbox"/> No <input type="checkbox"/> Not applicable as our organisation does not fundraise			
PE 04	Voluntary	Additional Assessed	PRI 4
Private			
PE 05	Mandatory	Gateway	PRI 1
PE 05.1	During due-diligence indicate if your organisation typically incorporates ESG issues when selecting private equity investments.		
<input checked="" type="checkbox"/> Yes			
PE 05.2	Describe your organisation's approach to incorporating ESG issues in private equity investment selection.		
<p>When evaluating all investments BMO PE may make, we engage with the lead managers and, if appropriate, the proposed investee company's management with regard to environmental, social and corporate governance ("ESG") matters. As a founder signatory to the United Nations Principles of Responsible Investment ("UNPRI"), BMO Global Asset Management is committed to integrating the analysis of ESG matters across all asset classes. In the private equity asset class most managers are making good progress in incorporating the management of ESG into their investment process. Where there is specific over or underperformance, risks or opportunities, we highlight this in the ESG section of our investment proposal documents. This is then discussed among the investment committee when deciding whether to go forward with the investment.</p> <p>For co-investments we will review ESG due diligence conducted on the company and discuss this with the lead manager, due diligence provider and company management as appropriate. We will also look for ESG to be incorporated into the '100 day plan' to ensure that any areas requiring strengthening are addressed quickly post investment.</p>			
<input type="checkbox"/> No			

PE 06	Mandatory	Core Assessed	PRI 1,3
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PE 06.1 Indicate what type of ESG information your organisation typically considers during your private equity investment selection process.

- Raw data from target company
 - Benchmarks against other companies
 - Sector level data/benchmarks
 - Country level data/benchmarks
 - Reporting standards, industry codes and certifications
 - International initiatives, declarations or standards
 - Engagements with stakeholders (e.g. customers and suppliers)
 - Advice from external resources
 - Other, specify
- ESG due diligence provided by specialist advisers
- We do not track this information

PE 06.2 Describe how this information is reported to, considered and documented by the Investment Committee or similar.

We receive information via data room from our investment partners and follow-up where necessary with the manager (for a primary investment) or with company management directly (in the case of a co-investment) if we have any specific ESG questions.

We are also able to use our specialist Responsible Investment team to benchmark companies and get an insight into the key ESG areas impacting sectors.

Where appropriate third party ESG due diligence is also conducted.

PE 07	Voluntary	Additional Assessed	PRI 1,2
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Private

PE 08	Voluntary	Additional Assessed	PRI 1
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Private

PE 09	Mandatory	Gateway/Core Assessed	PRI 2
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PE 09.1 Indicate whether your organisation incorporates ESG issues in investment monitoring of portfolio companies.

Yes

PE 09.2 Indicate the proportion of portfolio companies where your organisation included ESG performance in investment monitoring during the reporting year.

- >90% of portfolio companies
- 51-90% of portfolio companies
- 10-50% of portfolio companies
- <10% of portfolio companies

PE 09.3 Indicate ESG issues for which your organisation typically sets and monitors targets (KPIs or similar) and provide examples per issue.

- Environmental
- Social
- Governance
- We do not set and/or monitor against targets

No

PE 09.4 Additional information. [Optional]

We currently review key ESG risks and specific events for portfolio companies plus progress against agreed plans.

Going forward we are keen to introduce company specific ESG/impact KPIs for specific funds/mandates, as well as monitoring alignment with the UN Sustainable Development Goals.

PE 10	Mandatory	Core Assessed	PRI 2
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PE 10.1 Indicate if your organisation tracks the proportion of your portfolio companies that have an ESG/sustainability-related policy (or similar guidelines).

Yes

PE 10.2 Indicate what percentage of your portfolio companies has an ESG/sustainability policy (or similar guidelines).

- >90% of portfolio companies
- 51-90% of portfolio companies
- 10-50% of portfolio companies
- <10% of portfolio companies
- 0% of portfolio companies

No

PE 10.3 Additional information. [Optional]

As part of our commitment to responsible investment, we produce an annual ESG report discussing the ESG policies and procedures of our private equity investment partners. Within this report we track the proportion of managers that have a formal ESG policy, alongside other important metrics (e.g. who is responsible for implementation of ESG policy, level of ESG training offered, particular sectors presenting ESG risks etc.)

PE 11	Voluntary	Additional Assessed	PRI 2
<i>Private</i>			
PE 12	Voluntary	Descriptive	PRI 2,3
<i>Private</i>			
PE 13	Voluntary	Additional Assessed	PRI 2
<i>Private</i>			
PE 14	Voluntary	Additional Assessed	PRI 1,2
<i>Private</i>			
PE 15	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1,2
<i>Private</i>			
PE 16	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 6
<i>Private</i>			

PR 01	Mandatory	Core Assessed	PRI 1-6
PR 01.1	Indicate if your organisation has a Responsible Property Investment (RPI) policy.		
	<input checked="" type="checkbox"/> Yes		
PR 01.2	Provide a URL or attach the document		
	<input checked="" type="checkbox"/> URL https://www.bmorep.com/wp-content/uploads/2019/01/cm18858-bmo-rep-rpi-statement_update-01_2019.pdf		
	<input type="checkbox"/> Attach Document		
	<input type="radio"/> No		
PR 01.3	Provide a brief overview of your organisation's approach to responsible investment in property, and how you link responsible investment in property to your business strategy. [Optional]		
	<p>BMO Real Estate Partners' ESG policy is articulated through its Responsible Property Investment (RPI) Position Statement and Responsible Property Investment (RPI) Brochure both of which can be viewed at:</p> <p>https://www.bmorep.com/wp-content/uploads/2019/01/cm18858-bmo-rep-rpi-statement_update-01_2019.pdf</p> <p>https://www.bmorep.com/wp-content/uploads/2018/10/cm16109-bmo-rep-responsible-property-investment.pdf</p> <p>These summarise the Manager's attitude to RPI and recognise the dual imperative of managing ESG risk effectively whilst seeking to enhance investment returns through identification and execution of value creation opportunities. The core philosophy is to ensure investment returns and portfolio performance are not compromised by emerging trends, whether they be environmental, social, economic, technological or geopolitical, and to be responsive to market demands by repositioning assets in the context of such trends.</p>		
PR 02	Mandatory	Core Assessed	PRI 1,4,6
PR 02.1	Indicate if your most recent fund placement documents (private placement memorandums (PPMs) or similar) refer to responsible investment aspects of your organisation.		
	<input checked="" type="checkbox"/> Yes		
PR 02.2	Indicate how your fund placement documents (PPMs or similar) refer to the following responsible investment aspects of your organisation:		
	<input checked="" type="checkbox"/> Policy and commitment to responsible investment <input checked="" type="checkbox"/> Approach to ESG issues in pre-investment processes <input checked="" type="checkbox"/> Approach to ESG issues in post-investment processes		
PR 02.3	Describe how your organisation refers to responsible investment for property funds in fund placement documents (PPMs or similar). [Optional]		
	<p>Our latest fundraising activities relate to a UK Housing strategy where the fund will invest in the UK build-to-rent sector and design, build and manage high density apartments and low-density houses across the UK, targeting core city or town centre and suburban locations for the long term (circa 25 years). The fund has partnered with a Registered Social Landlord as its primary development partner. The fund, aimed at a cohort viewed as the 'squeezed middle' being those that are not eligible for social housing but neither can they afford high cost amenity led living, has an innovative flexible rent model that regulates the proportion of market and affordable rents as they vary over time and differing economic conditions. The fund has strong social objectives embedded into the investment philosophy and decision-making process and this is articulated through the fund's ESG Impact policy and measurement system which is referenced in key fund documentation.</p> <p>The consideration of ESG broadly revolves around the evaluation of pipeline proposals against six key specific and weighted criteria, with particular emphasis given to the degree of additionality. The initial and ongoing viability of schemes are impacted by the extent to which the ESG criteria achieve and maintain set minimum thresholds, and these are written into the fund manager's mandate. The mechanism identifies regular ESG touchpoints throughout the lifespan of individual assets, and includes a set protocol for maintaining or re-establishing ESG credentials should market or other externalities make that necessary. The entire methodology is underpinned by a reporting and feedback loop supported by an independent ESG advisory board.</p> <p>The integration of ESG into investment products as described in this latest example is a common feature of other strategies being developed currently. Our principle objective is to create financial products where ESG forms part of the DNA of the fund.</p>		
	<input type="radio"/> No <input type="radio"/> Not applicable as our organisation does not fundraise		
PR 03	Voluntary	Additional Assessed	PRI 4
	Private		
PR 04	Mandatory	Gateway/Core Assessed	PRI 1
PR 04.1	Indicate if your organisation typically incorporates ESG issues when selecting property investments.		
	<input checked="" type="checkbox"/> Yes		
PR 04.2	Provide a description of your organisation's approach to incorporating ESG issues in property investment selection.		
	<p>ESG issues are core considerations during acquisition due diligence. We routinely issue a brief to all our acquisition due-diligence consultants – they consider and report back on potential risks such as those from contamination, susceptibility to climate risks, flood, and regulatory risks posed by issues such as minimum energy performance standards, as well as considering what opportunities may be present to make improvements through interventions. We consider what impact an acquisition might have of overall fund ESG characteristics and profiles. We factor the outputs from such investigations into the decision making process by including a specific section, completed by internal sustainability professionals, into the Investment Committee approval papers.</p>		

PR 04.3	Indicate which E, S and/or G issues are typically considered by your organisation in the property investment selection process, and list up to three examples per issue.
<input checked="" type="checkbox"/> Environmental Contamination Energy efficiency Resilience <input checked="" type="checkbox"/> Social Health, safety and wellbeing Accessibility <input checked="" type="checkbox"/> Governance Anti-bribery & corruption <input type="radio"/> No	

PR 05	Voluntary	Additional Assessed	PRI 1,3
Private			

PR 06	Mandatory	Core Assessed	PRI 1
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PR 06.1	Indicate if ESG issues impacted your property investment selection process during the reporting year.
<input checked="" type="checkbox"/> ESG issues helped identify risks and/or opportunities for value creation <input checked="" type="checkbox"/> ESG issues led to the abandonment of potential investments <input type="checkbox"/> ESG issues impacted the investment in terms of price offered and/or paid <input type="checkbox"/> ESG issues impacted the terms in the shareholder/purchase agreements and/or lending covenants <input checked="" type="checkbox"/> ESG issues were considered but did not have an impact on the investment selection process <input type="checkbox"/> Other, specify <input type="checkbox"/> Not applicable, our organisation did not select any investments in the reporting year <input type="checkbox"/> We do not track this potential impact	

PR 06.2	Indicate how ESG issues impacted your property investment deal structuring processes during the reporting year.
<input type="checkbox"/> ESG issues impacted the investment in terms of price offered and/or paid <input type="checkbox"/> ESG issues impacted the terms in the shareholder/purchase agreements and/or lending covenants <input checked="" type="checkbox"/> ESG issues were considered but did not have an impact on the deal structuring process <input type="checkbox"/> Other, specify <input type="checkbox"/> Not applicable, our organisation did not select any investments in the reporting year <input type="checkbox"/> We do not track this potential impact	

PR 06.3	Additional information.
<p>A potential acquisition in Birmingham was abandoned on the basis of insufficient comfort being established in respect of energy performance ratings and ability to improve to acceptable levels in a commercial context.</p>	

PR 07	Mandatory	Core Assessed	PRI 4
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PR 07.1	Indicate if your organisation includes ESG issues in your selection, appointment and/or monitoring of third-party property managers.
<input checked="" type="checkbox"/> Yes	

PR 07.2	Indicate how your organisation includes ESG issues in your selection, appointment and/or monitoring of third party property managers.
<input type="checkbox"/> Selection process of property managers incorporated ESG issues <input type="checkbox"/> Contractual requirements when appointing property managers includes ESG issues <input checked="" type="checkbox"/> Monitoring of property managers covers ESG responsibilities and implementation	
Types of actions	
<input type="checkbox"/> Performance against quantitative and material environmental / resource targets over specified timeframe. <input checked="" type="checkbox"/> Performance against quantitative and material environmental / resource targets against relevant benchmarks <input type="checkbox"/> Performance against quantitative and qualitative targets to address social impacts of the portfolio/investment, <input type="checkbox"/> Other, explain	
Coverage	
<input checked="" type="radio"/> >75% to 100% <input type="radio"/> >50% to 75% <input type="radio"/> <50%	
<input type="radio"/> No	

PR 07.3	Provide a brief description of your organisations selection, appointment and monitoring of third party property managers and how they contribute to the management of ESG issues for your property investments.
<p>BMOREP predominantly implements fund, asset and property management activities through direct internal resource. Attendance to ESG aspects are included within each professional's performance objectives and annual compensation reviews take account of achievement against goals and targets. In that respect, ESG could be considered as being contractual since the expectation is that staff comply with the reasonable instructions and expectations of the company with failure to do so potentially resulting in disciplinary actions.</p> <p>In limited circumstances, BMOREP will outsource the property management function to external property managing agents, principally driven by geographic coverage and resource pressures. In such cases, external agents will be advised of the expectations in respect of ESG matters and through typically quarterly management review meetings will be required to include ESG in their reporting protocols.</p> <p>Collectively, both internal and external elements will be combined for the purpose of monitoring, management and reporting.</p>	

PR 08	Mandatory	Gateway	PRI 2
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PR 08.1	Indicate if your organisation, and/or property managers, considers ESG issues in post-investment activities relating to your property assets.
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Yes

PR 08.2	Indicate whether your organisation, and/or property managers, considers ESG issues in the following post-investment activities relating to your property assets.
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- We consider ESG issues in property monitoring and management
- We consider ESG issues in property developments and major renovations.
- We consider ESG issues in property occupier engagements
- We consider ESG issues in community engagements related to our properties
- We consider ESG issues in other post-investment activities, specify

PR 08.3	Describe how your organisation, and/or property managers, considers ESG issues in post-investment activities related to your property assets.
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The integration of ESG matters into BMO REP's regular post-investment business practice can be summarised as follows:

ESG Committee - Operating under specific terms of reference, this committee meets quarterly under the chairmanship of the Head of UK operations. This group's principal role is to provide leadership and direction in respect of ESG matters, to anticipate and respond to regulatory pressures and industry sentiment, and to monitor and oversee the implementation of ESG strategy across our property investment funds. The group's composition has representation from our primary property functions and is supplemented by the participation of our parent group's Responsible Investments team as well as our retained external sustainability consultant.

Responsible Property Investment Framework and Appraisal Tool - Our ESG framework provides the structure around which the relationships between our various property functions operate, reinforcing the concept that every individual has a part to play and a contribution to make towards the successful integration of ESG matters into our property investment activities. The RPI Appraisal Tool is a key instrument to support this integration, capturing a range of business critical and other ESG related metrics, from various sources, for ultimate incorporation into individual property asset business plans.

Asset Manager & Property Manager Guidance - These two core documents serve dual purpose insofar as they provide supporting background information and context for key relevant ESG matters as well as detailing our specific policy and procedures against them. They articulate a methodical approach to key stages in the property cycle – from acquisition, management, leasing, capital works and refurbishment, to disposal and suggest a frequency for intervention depending on materiality. These documents cover the familiar issues of energy efficiency, water efficiency, waste management, and associated monitoring and control regimes. This guidance is supplemented with regular training sessions, often with the help of external professionals, and typically involve debate and discussion about the practical integration of ESG into day to day activity.

We aim to maintain optimum environmental performance where we have any degree of direct management control over the property assets, typically through monitoring and benchmarking, but we also look for opportunities to engage and encourage our tenant occupiers to align with such aspirations. We look to improve environmental credentials whenever intervention opportunities arise, such as those presented by refurbishment for which we have a Refurbishment Brief with prescribe targets set against key aspects such as flexibility, materials, recycling and prefabrication, energy, water, waste, social, health and wellbeing, transport, durability and resilience.

We are committed to maintaining safe and secure property assets which are valued by our tenant occupiers and visitors to the premises. Where we have any degree of management control, we implement a robust regime of health and safety auditing and monitoring to ensure the ongoing wellbeing of all building users. We undertake tenant survey to establish sentiment in respect of landlord service provision and this specifically includes ESG aspects.

No

PR 09	Mandatory	Core Assessed	PRI 2,3
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PR 09.1	Indicate the proportion of property assets for which your organisation, and/or property managers, set and monitored ESG targets (KPIs or similar) during the reporting year.
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- >90% of property assets
- 51-90% of property assets
- 10-50% of property assets
- <10% of property assets

PR 09.2	Indicate which ESG targets your organisation and/or property managers typically set and monitor
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Environmental

Target/KPI	Progress Achieved
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<p>energy intensity reduction target of 20% by 2031 from a 2016 baseline for listed UK entities and adopted by non-listed UK entities under management</p> <p>Short term energy consumption reduction targets set for individual assets ranging between 2 and 4% depending on positioning against industry benchmarks</p> <p>Year on year water intensity reduction of 1% across all UK assets</p>	<p>Circa 14% average reduction across the relevant funds</p> <p>49% of sites achieved their individual short term target for 2019</p> <p>Water consumption has increased overall, driven principally by the reduction of voids</p>
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Social

Target/KPI	Progress Achieved
100% of health and safety risk assessments completed to programme and no deaths or reportable incidents encountered	Achieved
Implement independent third party tenant survey exercise in selected properties	Survey undertaken and feedback delivered to professional team

Governance

Target/KPI	Progress Achieved
Year on year improvement in overall GRESB score for participating funds	Circa 45% improvement in overall score achieved for all funds in 2019 survey
Year on year improvement in GRESB Public Disclosure score for UK listed entities	Each listed entity secured improvement in rating in 2019
CDP full tier climate change module: achieve an initial score for UK listed entities under management	Achieved a rating of C in 2019 survey

We do not set and/or monitor against targets

PR 09.3 Additional information. [Optional]

Additional Environmental: Target: 100% of waste is averted from landfill; Progress: Circa 83% of UK sites under operational control achieved this target in 2019

The organisation has not thus far set consolidated house level targets although has ambitions to do so in the short term. However, individual UK portfolios have set both short and long term environmental, social and governance targets as identified above.

PR 10	Voluntary	Descriptive	PRI 2
Private			

PR 11	Mandatory	Core Assessed	PRI 2
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PR 11.1 Indicate the proportion of active property developments and major renovations where ESG issues have been considered.

- >90% of active developments and major renovations
- 51-90% of active developments and major renovations
- 10-50% of active developments and major renovations
- <10% of active developments and major renovations
- N/A, no developments and major renovations of property assets are active

PR 11.2 Indicate if the following ESG considerations are typically implemented and monitored in your property developments and major renovations.

- Environmental site selection requirements
- Environmental site development requirements
- Sustainable construction materials
- Water efficiency requirements
- Energy efficiency requirements
- Energy generation from on-site renewable sources
- Waste management plans at sites
- Health and safety management systems at sites
- Health and wellbeing of residents
- Construction contractors comply with sustainability guidelines
- Resilient building design and orientation
- Other, specify

PR 11.3 Additional information. [Optional]

BMOREP does not currently undertake development work but has performed a handful of significant refurbishments during the reporting year. Every significant refurbishment has the aspiration of achieving a BREEAM rating of at least very good, and the pursuit of that rating will stimulate the consideration of the factors identified in the table above. Smaller refurbishment of existing structures may not warrant formal accreditation but the same factors will be given consideration.

PR 12	Mandatory	Core Assessed	PRI 2
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PR 12.1	Indicate the proportion of property occupiers your organisation, and/or your property managers, engaged with on ESG issues during the reporting year.
<input type="radio"/> >90% of occupiers <input checked="" type="radio"/> 50-90% of occupiers <input type="radio"/> 10-50% of occupiers <input type="radio"/> <10% of occupiers	

PR 12.2	Indicate if the following practises and areas are typically part of your, and/or your property managers', occupier engagements.
<input type="checkbox"/> Distribute a sustainability guide to occupiers <input type="checkbox"/> Organise occupier events focused on increasing sustainability awareness <input type="checkbox"/> Deliver training on energy and water efficiency <input type="checkbox"/> Deliver training on waste minimisation <input type="checkbox"/> Provide feedback on energy and water consumption and/or waste generation <input type="checkbox"/> Provide feedback on waste generation <input checked="" type="checkbox"/> Carry out occupier satisfaction surveys <input type="checkbox"/> Health and wellbeing of residents <input checked="" type="checkbox"/> Offer green leases <input type="checkbox"/> Other, specify	

PR 12.3	Additional information. [Optional]
<p>BMOREP undertook occupier satisfaction surveys on a sample number of sites, based on covering multiple funds and asset types, engaging an independent expert consultant to carry out telephone and face-to-face interviews with ESG forming part of the overall questioning. The output includes obtaining a net promoter score against which improvement can be measured over time.</p> <p>At the beginning of 2018, all UK solicitors engaged by BMOREP were provided with a policy document and instructed to routinely include green lease clauses in all future lease negotiations, subject to commercial requirements .</p>	

PR 13	Voluntary	Additional Assessed	PRI 2
<i>Private</i>			
PR 15	Voluntary	Additional Assessed	PRI 1,2
<i>Private</i>			

CM1 01	Mandatory	Additional Assessed	General
CM1 01.1	Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:		
<input type="checkbox"/> Third party assurance over selected responses from this year's PRI Transparency Report <input type="checkbox"/> Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year <input type="checkbox"/> Third party assurance or audit of the correct implementation of RI processes (that have been reported to the PRI this year) <input checked="" type="checkbox"/> Internal audit of the correct implementation of RI processes and/or accuracy of RI data (that have been reported to the PRI this year) <input checked="" type="checkbox"/> Internal verification of responses before submission to the PRI (e.g. by the CEO or the board) <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Whole PRI Transparency Report has been internally verified <input type="checkbox"/> Selected data has been internally verified <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above			
CM1 02	Mandatory	Descriptive	General
CM1 02.1	We undertook third party assurance on last year's PRI Transparency Report		
<input type="checkbox"/> Whole PRI Transparency Report was assured last year <input type="checkbox"/> Selected data was assured in last year's PRI Transparency Report <input checked="" type="checkbox"/> We did not assure last year's PRI Transparency report <input type="checkbox"/> None of the above, we were in our preparation year and did not report last year.			
CM1 03	Mandatory	Descriptive	General
CM1 03.1	We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:		
<input checked="" type="checkbox"/> We adhere to an RI certification or labelling scheme			
CM1 03.2	Which scheme?		
<input type="checkbox"/> National SRI label based on the EUROSIF Transparency guidelines <input type="checkbox"/> B-corporation <input checked="" type="checkbox"/> UK Stewardship code			
	% of total AUM the scheme applies		
<input type="checkbox"/> < 25% <input type="checkbox"/> 25-50 % <input checked="" type="checkbox"/> 50-70 % <input type="checkbox"/> >75 %			
<input checked="" type="checkbox"/> GRESB			
	% of total AUM the scheme applies		
<input checked="" type="checkbox"/> < 25% <input type="checkbox"/> 25-50 % <input type="checkbox"/> 50-70 % <input type="checkbox"/> >75 %			
<input type="checkbox"/> Commodity type label (e.g. BCI) <input type="checkbox"/> Social label <input type="checkbox"/> Climate label <input type="checkbox"/> RIAA <input type="checkbox"/> Other			
<input type="checkbox"/> We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report <input type="checkbox"/> ESG audit of holdings <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above			
CM1 04	Mandatory	Descriptive	General
CM1 04.1	Do you plan to conduct third party assurance of this year's PRI Transparency report?		
<input type="checkbox"/> Whole PRI Transparency Report will be assured <input type="checkbox"/> Selected data will be assured <input checked="" type="checkbox"/> We do not plan to assure this year's PRI Transparency report			

CM1 06	Mandatory	Descriptive	General
CM1 06.1	Provide details of the third party assurance of RI related processes, and/or details of the internal audit conducted by internal auditors of RI related processes (that have been reported to the PRI this year)		
What RI processes have been assured			
<input checked="" type="checkbox"/> Data related to RI activities <input checked="" type="checkbox"/> RI policies			
Specify			
CG Guidelines, Responsible Investment Approach			
<input checked="" type="checkbox"/> RI related governance <input checked="" type="checkbox"/> Engagement processes <input checked="" type="checkbox"/> Proxy voting process <input type="checkbox"/> Integration process in listed assets <input type="checkbox"/> Screening process in listed assets <input type="checkbox"/> Thematic process in listed assets <input type="checkbox"/> Investment selection process in non-listed assets <input type="checkbox"/> Manager selection process for externally managed assets <input type="checkbox"/> Manager appointment process for externally managed assets <input type="checkbox"/> Manager monitoring process for externally managed assets <input type="checkbox"/> Third party property manager SAM process <input type="checkbox"/> ESG incorporation in selection process for private equity investments <input type="checkbox"/> Post-investment ESG activities for infrastructure and/or property assets <input type="checkbox"/> Other			
When was the process assurance completed(dd/ mm/yy)			
31/12/2019			
Assurance standard used			
<input type="checkbox"/> IIA's International Standards for the Professional Practice of Internal Auditing <input type="checkbox"/> ISAE 3402 <input type="checkbox"/> ISO standard <input type="checkbox"/> AAF 01/06 <input type="checkbox"/> SSE18 <input type="checkbox"/> AT 101 (excluding financial data) <input checked="" type="checkbox"/> Other			
Specify			
own internal audit standards as required by relevant regulators (i.a. UK, Canada, US, HK)			

CM1 07	Mandatory	Descriptive	General
CM1 07.1	Indicate who has reviewed/verified internally the whole - or selected data of the - PRI Transparency Report . and if this applies to selected data please specify what data was reviewed		
<input checked="" type="checkbox"/> CEO or other Chief-Level staff			
Sign-off or review of responses			
<input checked="" type="checkbox"/> Sign-off <input type="checkbox"/> Review of responses			
<input type="checkbox"/> The Board <input type="checkbox"/> Investment Committee <input checked="" type="checkbox"/> Compliance Function <input checked="" type="checkbox"/> RI/ESG Team <input checked="" type="checkbox"/> Investment Teams <input checked="" type="checkbox"/> Legal Department <input checked="" type="checkbox"/> Other (specify)			
specify			
Head of Credit Research			