

Statement on Anti-Corruption and Anti-Bribery

Criminal activity has no place at BMO. Our reputation is based on trust we have earned from the people we work with and the customers we serve. To maintain this trust, we must be alert to corruption and bribery.

Anti-corruption and anti-bribery principles

Our Anti-Corruption Corporate Standard applies to all BMO employees globally. Under our Standard, employees must not:

- take part in bribes or other corrupt activity
- offer, accept, or request gifts, entertainment, or other benefits intended to improperly influence a business decision
- give improper advantage or compromise, or *appear* to compromise, the recipient's or donor's judgment or honest performance of their duties
- directly or indirectly promise, approve, or offer anything of greater than nominal value to a government official or government agency on behalf of BMO

Our standards for suppliers and third parties

We expect our suppliers and third parties to comply with anti-corruption and anti-bribery laws, as well as support our standards for integrity, fair dealing, and sustainability. For more information, see BMO's Supplier Code of Conduct.

Our Anti-Corruption Program

Our Anti-Corruption Program is in place to ensure we follow anti-corruption laws everywhere we operate. As part of this Program, employees receive ongoing training in interpreting and applying our Standard.

Raising concerns

All BMO employees are responsible for doing what's right and raising concerns about corruption. We have various ways for employees to report suspicious conduct.

Issued: October 2011 Updated: April 2016