European SRI Transparency Code

The European SRI Transparency Code (the Code) focuses on SRI funds distributed publicly in Europe and is designed to cover a range of assets classes, such as equity and fixed income.

All information pertaining to the European SRI Transparency Code can be found at the following website: www.eurosif.org. The Code comes with a Guidance Manual for fund managers on how to best use and respond to the Code. The present version of the Code was approved by the Board of Eurosif in February 2018.

Revision of the Code

In 2017 the Code was updated to better reflect the continuing evolution of the European SRI market. A Working Group was set up to facilitate revision of the Code in line with the latest developments in the industry and in view of the latest work carried out by experts at the European and global level.

Applications to sign up to the Code will now be in line with key elements of the recommendations made by the Task Force on Climate-related Financial Disclosures (TCFD), Article 173 of the French TECV Act and the latest recommendations made by the High-Level Group of Experts on Sustainable Finance (HLEG) in its final report published in January 2018. Questions that are specifically designed to reflect those recommendations/legislation are indicated in the Code with footnotes.

Two Key Motivations Underpin This Code

1. The opportunity for retail SRI funds to provide clarification to investors and other stakeholders about their SRI approach in an easily accessible and comparable format.
2. Proactive strengthening of self-regulation to contribute to the development and promotion of SRI funds by setting up a common framework for transparency best practices.

Guiding Principle

Signatories to the Code should be open and honest and should disclose accurate, adequate and timely information to enable stakeholders, especially consumers, to understand the ESG policies and practices of the fund.

Commitments by Signatories

• The order and exact wording of the questions should be followed;
• Responses should be informative and clear, and the resources and methodologies used should be described in as much detail and as precisely as possible;
• Funds should report data in the currency that they use for other reporting purposes;
• Reasons preventing the fund from providing all or part of the information to a given question should be clearly stated and, in such cases, signatories should state when they will be able to answer the question;
• Responses should be updated at least on an annual basis and should have a precise publication date;
• Responses to the Code should be easily accessible from the website of the fund and/or of the fund manager. In any case, signatories should make it clear where to find the information required by the Code;
• Signatories are solely responsible for the answers to the questions, and should state this in their response.

Statement of Commitment

Complete/modify the below section accordingly

Sustainable and Responsible Investing is an essential part of the strategic positioning and behaviour of BMO Global Asset Management. We have been involved in SRI since 1984 and welcome the European SRI Transparency Code. This is our first statement of commitment and covers the period 12 months from approval. Our full response to the European SRI Transparency Code can be accessed below and is available in the annual report of the retail funds and on our website.

Compliance with the Transparency Code

BMO Global Asset Management is committed to transparency and we believe that we are as transparent as possible given the regulatory and competitive environments that exist in the countries in which we operate. BMO Global Asset Management meets the full recommendations of the European SRI Transparency Code.

May 2019

Eurosif classification of Sustainable and Responsible Investment strategies

**Sustainability Themed Investment:** investment in themes or assets linked to the development of sustainability. Thematic funds focus on specific or multiple issues related to ESG. Sustainability Themed Investments inherently contribute to addressing social and/or environmental challenges, such as climate change, eco-efficiency and health. Funds are required to perform an ESG analysis or screening of investments in order to come under this category.

**Best-in-Class Investment Selection:** approach according to which leading or best-performing investments within a universe, category or class are selected or weighted based on ESG criteria. This approach involves the selection or weighting of the best-performing or most improved companies or assets as identified by ESG analysis within a defined investment universe. This approach includes best-in-class, best-in-universe and best-effort.

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1 Sustainable and responsible investment ("SRI") is a long-term oriented investment approach which integrates ESG factors in the research, analysis and selection process of securities within an investment portfolio. It combines fundamental analysis and engagement with an evaluation of ESG factors in order to better capture long-term returns for investors and to benefit society by influencing the behaviour of companies. Ref. Eurosif 2016
Norms-Based Screening: screening of investments according to their compliance with international standards and norms. This approach involves the screening of investments based on international norms or combinations of norms covering ESG factors. International norms on ESG are those defined by international bodies, such as the United Nations (UN).

Exclusion of Holdings from Investment Universe: an approach that excludes specific investments or classes of investment from the investible universe, such as companies, sectors or countries. This approach systematically excludes companies, sectors or countries from the permissible investment universe if they are involved in certain activities based on specific criteria. Common criteria include weapons, pornography, tobacco and animal testing. Exclusions can be imposed at the individual fund or mandate level, but also increasingly at the asset manager or asset owner level, across the entire product range of assets. This approach is also referred to as ethical or values-based exclusion, as exclusion criteria are typically based on the choices made by asset managers or asset owners.

Integration of ESG Factors into Financial Analysis: the explicit inclusion by asset managers of ESG risks and opportunities in traditional financial analysis and investment decisions based on a systematic process and appropriate research sources. This category covers explicit consideration of ESG factors alongside financial factors in the mainstream analysis of investments. The integration process focuses on the potential impact of ESG issues on company financials (positive and negative), which in turn may affect the investment decision.

Engagement and Voting on Sustainability Matters: engagement activities and active ownership through voting of shares and engagement with companies on ESG matters. This is a long-term process that seeks to influence behaviour or increase disclosure. Engagement and voting on corporate governance are necessary, but are not sufficient in themselves for inclusion in this category.

Impact Investing: impact Investments are investments in companies, organisations and funds with the intention of generating a social and environmental impact alongside a financial return. Impact investments can be made in both emerging and developed markets and target a range of returns from below market-to-market rate, depending upon the circumstances\(^2\). Investments are often project-specific and distinct from philanthropy, as the investor retains ownership of the asset and expects a positive financial return. Impact investing includes microfinance, community investing, social business/entrepreneurship funds and French fonds solidaires.

Contents

1. List of funds covered by the Code
2. General information about the fund management company
3. General information about the SRI fund(s) that come under the scope of the Code
4. Investment process
5. ESG controls
6. Impact measures and ESG reporting

1. List of funds covered by the Code

Name of the fund(s): BMO Responsible UK Equity Income, BMO Responsible UK Equity Growth

<table>
<thead>
<tr>
<th>Dominant/preferred SRI strategy (Please choose a maximum of 2 strategies)</th>
<th>Asset class</th>
<th>Exclusions standards and norms</th>
<th>Fund capital as at 31 December</th>
<th>Other labels</th>
<th>Links to relevant documents</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Best-in-Class Investment section</td>
<td>☐ Engagement &amp; Voting</td>
<td>☐ ESG Integration</td>
<td>☒ Exclusions</td>
<td>☐ Impact Investing</td>
<td>☐ Norms-Based Screening</td>
</tr>
<tr>
<td>✓ Leading to exclusions</td>
<td>✓ Leading to risk management analysis/engagement</td>
<td>☐ Sustainability Themed</td>
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<tr>
<td>☒ Passively managed</td>
<td>☐ Passive investing core benchmark: specify the index tracking</td>
<td>☐ Passive investing ESG/SRI benchmark: specify the index tracking</td>
<td>BMO Responsible UK Income: £305.5mn</td>
<td>☐ French SRI label</td>
<td>- (KIID) - Prospectus - Management report - Financial and non-financial reporting - Corporate presentations - Other (please specify)</td>
</tr>
<tr>
<td>☐ Actively managed</td>
<td>☐ Shares in a euro area country</td>
<td>☐ Shares in an EU country</td>
<td>BMO Responsible UK Equity: £377.4mn</td>
<td>☐ French TEEC label</td>
<td>Please refer to Key Documents and Literature via the following link: <a href="https://www.bmoam.com/gb-en/intermediary/capabilities/responsible-investing/">https://www.bmoam.com/gb-en/intermediary/capabilities/responsible-investing/</a></td>
</tr>
<tr>
<td>☐ Shares in an international country</td>
<td>☐ International shares</td>
<td>☐ Bonds and other debt securities denominated in euro</td>
<td></td>
<td>☐ French CIES label</td>
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<tr>
<td>☐ International bonds and other debt securities</td>
<td>☐ Monetary assets</td>
<td>☐ Short-term monetary assets</td>
<td></td>
<td>☐ Austrian Ecolabel</td>
<td></td>
</tr>
<tr>
<td>☐ Structured funds</td>
<td>☐ Controversial weapons</td>
<td>☐ Alcohol</td>
<td></td>
<td>☐ Other (please specify)</td>
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</tr>
<tr>
<td>☐ Genetic Engineering</td>
<td>☐ Deforestation</td>
<td>☐ CO2 intensive (including coal)</td>
<td></td>
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<tr>
<td>☐ Global Compact</td>
<td>☐ OECD Guidelines for MNCs</td>
<td>☐ ILO Conventions</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>☐ Other (Please refer to our Responsible Investment: Summary criteria)</td>
<td>☐ Conflict minerals</td>
<td>☐ Biodiversity</td>
<td></td>
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<td></td>
<td>☐ Human rights</td>
<td>☐ Arms</td>
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<td>☐ Labour rights</td>
<td>☐ Nuclear power</td>
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<td>☐ Gambling</td>
<td>☐ Human rights</td>
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<td>☐ Animal testing</td>
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<td>☐ Conflict minerals</td>
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<td>☐ Labour rights</td>
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<td>☐ ILO Conventions</td>
<td>☐ Gambling</td>
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<td></td>
<td>☐ Other (Please refer to our Responsible Investment: Summary criteria)</td>
<td>☐ Human rights</td>
<td></td>
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</tbody>
</table>

Please refer to Key Documents and Literature via the following link: https://www.bmoam.com/gb-en/intermediary/capabilities/responsible-investing/
2. General information about the fund management company

2.1. Name of the fund management company that manages the applicant fund(s)
BMO Global Asset Management.

2.2. What are the company's track record and principles when it comes to integrating SRI into its processes?

Please provide a hyperlink to any of the company's sustainable investment webpages. [https://www.bmogam.com/gb-en/intermediary/capabilities/responsible-investing/](https://www.bmogam.com/gb-en/intermediary/capabilities/responsible-investing/)

BMO Global Asset Management has been a pioneer and leader in responsible investment for more than three decades. Responsible investment is central to our corporate identity and integral to our overall investment philosophy. We are, therefore, fully committed to integrating ESG factors into our investment processes. We take ESG issues seriously, both as part of our responsibility as an investor and a participant in the global financial system. Importantly, we see the identification and, where possible, mitigation of ESG risks as part of a robust investment process underpinning long-term returns.

Our 16-strong Responsible Investment team is an in-house source of experience and expertise on the implications of ESG issues for investment. Responsible Investment team members and fund managers collaborate closely including through joint company meetings and regular internal seminars discussing key ESG trends such as climate change, bribery and corruption and tax policies, and their relevance to company valuation and active ownership activities.

With regards to integrating ESG factors into our investment analysis across asset classes including equities, corporate credit, sovereign credit, private equity and real estate, we take a tailored approach depending on the nuances of each asset class. Our approach to integration is fund manager-led and based on identifying material ESG issues as part of the standard investment process.

Our research analysts and portfolio managers follow a process that considers the potential impact of ESG issues related to investments in our internally managed portfolios. They have access to a range of ESG data and research, including both third-party data and proprietary information, as well as support in interpreting this information, provided by the specialist Responsible Investment Team. This analysis informs our asset allocation, stock selection, portfolio construction, shareholder engagement and voting.

Our obligations as investors do not end at the point where an investment decision is made. Having identified the issues presenting the greatest threats to long-term investor value, we use in-depth dialogue to encourage investee companies to improve performance and move towards best practice in the management of ESG issues. Our engagement encompasses a broad spectrum of ESG issues, covering companies across sectors and geographies.

We use a range of engagement tools and methods including in-person and phone meetings, written correspondence and emails. We engage at different levels within our investee companies, including board directors, executive management, investor relations and operational specialists. Typically, our engagement is one-to-one with companies, but where we see scope to collaborate with other investors or through stakeholder groups,
we may do so if this is in line with our objectives and will be more effective in achieving the desired outcome. Our approach is based on constructive and confidential dialogue, and on building a relationship of trust, where over time we gain a sound understanding of how key ESG issues fit into companies’ business strategies.

2.3. **How does the company formalise its sustainable investment process?**

*Please provide a link to the sustainable investment policy.*

*Please provide a link to the voting rights policy.*

*Please provide a link to the engagement policy.*

Our approach towards responsible ownership and integrating ESG-criteria in our investment process is described in our [Responsible Ownership Policy](#). These guidelines set out the approach to responsible ownership taken in relation to holdings in funds managed in the Europe, Middle East and Africa (EMEA) region by BMO Global Asset Management. The guidelines cover:

- **ESG integration** - integrating ESG issues into our investment process;
- **Engagement** - engaging in dialogue with companies on significant matters related to ESG issues, so as to reduce risk, improve performance, encourage best practice and underpin long-term investor value;
- **Corporate governance and voting** - voting in line with our [Corporate Governance Guidelines](#) across global holdings; communicating our concerns to companies wherever our votes do not support directors’ recommendations; and
- **Transparency** - Reporting on our voting and engagement to clients and the wider public.

Our [Global Corporate Governance Guidelines](#) establish a consistent philosophy on what we expect of our investee companies in terms of their own corporate governance structure. The document also details guidelines for the exercising of voting rights in line with this philosophy.

Our Global Executive Committee has ultimate responsibility for signing off the responsible investment policies followed by BMO Global Asset Management.

2.4. **How are ESG risks and opportunities - including those linked to climate change - understood/taken into account by company?**

As a long-term investor, we aim to build an understanding of the fundamental factors shaping the risks and opportunities of the companies we invest in. We believe that ESG issues can have a material impact on company performance and on the economy as a whole, and that robust ESG management by companies is an integral part of good risk management.

Companies that neglect ESG issues such as fraud, bribery and corruption, environmental compliance, human rights, labour standards and public health may suffer litigation and operational costs, damage to their reputation and brand value, and sometimes even a threat to their license to operate. Conversely, companies managing these issues well may be better placed to identify and act on ESG trends and turn these into business opportunities.

Portfolio managers, with the support of members of the Responsible Investment team, lead the integration of ESG factors into the investment process

**BMO Global Asset Management’s response to climate change risks**

BMO Global Asset Management, a founder signatory to the UN Principles for Responsible Investment, has a commitment to take financially-material ESG issues – including climate change - into account in all relevant

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3 Reference to Article 173 of the French TECV Act and the HLEG recommendations on INVESTOR DUTIES

4 Reference to Article 173 of the French TECV Act and the TCFD recommendations (risks and opportunities section)
investment strategies. Climate change, however, has particular issues that make it worthy of additional attention beyond our standard ESG integration processes, notably the fact that it’s impact is potentially cross-sectoral, cross-regional and could have systemic implications for financial markets.

BMO Global Asset Management has responded by taking specific steps to address climate risk. These include:

- Integrating ESG factors, including climate change, into the investment analysis process for all relevant asset classes.
- Support for the Task Force on Climate-related Financial Disclosure. Our parent company BMO Financial Group, has formally supported the TCFD recommendations, and this commitment covers BMO Global Asset Management as a subsidiary. BMO Global Asset Management is currently co-chairing a project by the Institutional Investors Group on Climate Change to develop a user guide to scenario analysis for investors, aimed at supporting the implementation of TCFD recommendations.
- Developing investment products which allow investors to avoid exposure to companies with fossil fuel reserves – the Responsible Funds range, which includes products in equity and fixed income, and a Canadian mutual fund, the BMO Fossil Fuel Free Fund.
- Developing investment products which allow investors to direct capital towards climate solutions. These include the Climate Opportunity Partners private equity fund, which is entirely invested in solution providers, and green bonds investments, which include two dedicated mandates for institutional investors.
- Engagement and proxy voting approach aimed at encouraging investee companies to address climate risks. BMO Global Asset Management is an active participant in the US$30trn Climate Action 100+ initiative which aims to improve companies’ governance, strategy and disclosure in relation to climate change.
- Support for public policy statements on climate change, such as the Investor Statement released in 2018, as well as interventions on specific policies such as European emissions trading reforms.
- Transparency, including the publication of carbon footprints for two of our Responsible Funds as part of wider impact reporting. BMO Global Asset Management will also be publishing its own response to the TCFD recommendations.

2.5. How many employees are directly involved in the company’s sustainable investment activity?

The Responsible Investment team is responsible for planning and implementing the firm’s sustainable investment activity, with oversight from the Executive Committee.

Our dedicated in-house Responsible Investment (RI) team is one of the largest and most experienced teams of its kind in Europe. The 16-member team manages our dedicated engagement and voting service reo® and has been instrumental in the integration of ESG related considerations across a wide range of our investment processes. The team is co-led by Claudia Wearmouth and Alice Evans and is the 2018 Investment Week Sustainable & ESG Investment Awards winner for Best ESG Research Team.

The team has extensive experience gained in financial services, charities, the media, consultancy, public policy and industry, and is responsible for all ESG research, engagement and voting activities. The Responsible Investment team forms part of the Investment Management department as we believe the monitoring and analysis of ESG data is a core part of investment processes across our business. The heads of each investment desk, together with their analysts, are responsible for the ultimate implementation of ESG research and data into portfolio construction.

We organise the Responsible Investment team on a matrix structure which includes:
- Experienced **sector specialists** for the highest-risk sectors (including oil & gas, mining, food & beverage, retail, pharmaceuticals and financial services);

- **Regional specialists**;

- **Issue specialists**, covering in particular corporate governance, climate change, human rights, business ethics and labour standards;

- Six members of the team conduct both **governance and voting** – with voting split by regional responsibility.

**BMO Responsible UK Growth Equity/BMO Responsible UK Income Equity Funds**
The funds are managed by three distinct teams with the process led by the UK Equities team, as follows:

**UK Equities team:** Catherine Stanley is the lead manager of the BMO Responsible UK Equity Growth and BMO Responsible UK Equity Income Funds. Catherine manages the funds with the support of Patrick Newens, Peter Ewins, Nish Patel, Gordon Happell and Bradley Walsh. Within ethical constraints, the team identify attractive investment opportunities within a universe set by the Responsible Investment team - in conjunction with input from the Responsible Investment Advisory Council - taking into account their impact on the overall risk profile of the fund.

The 16-strong **Responsible Investment team** undertakes extensive research on ethical and environmental, and social and governance issues for each company proposed for inclusion or actively held within the Fund as outlined above. The Responsible Investment team is then responsible for managing ongoing engagement and proxy voting for all companies owned in the fund.

The independent **Responsible Investment Advisory Council** is a six-member committee of experts, who are leaders in their fields and bring international experience across responsible investment, ethical, environmental and social issues. Their primary role is to provide advice on the ethical criteria for our specialist Responsible Fund range. The Responsible Investment team is also able to draw on their expertise in informing our broader engagement and responsible investment approach.

The Council’s President is the Most Reverend Justin Welby, Archbishop of Canterbury. The Chair, who heads the quarterly meetings, is Howard Pearce, formerly Head of Environmental Finance and Pension Fund Management at the UK’s Environment Agency Pension Fund (EAPF).
2.6. Is the company involved in any RI initiatives?

We are currently members of the organisations in the table below. In addition, we also work collaboratively with other investors and with NGOs on an issue-by-issue basis.

<table>
<thead>
<tr>
<th>Organization / Initiative</th>
<th>Key Areas of Focus</th>
<th>Start date</th>
</tr>
</thead>
<tbody>
<tr>
<td>UN Principles for Responsible Investment (UN PRI)</td>
<td>The world’s leading organization for responsible investors. We were a founder signatory.</td>
<td>2006</td>
</tr>
<tr>
<td>Carbon Disclosure Project (CDP)</td>
<td>Global disclosure system for companies, cities, states and regions to manage their environmental impacts and for investors or purchasers to access environmental information for use in financial decisions.</td>
<td>2000</td>
</tr>
<tr>
<td>Institutional Investors Group on Climate Change (IIGCC)</td>
<td>Provides investors with a collaborative platform to encourage public policies, investment practices, and corporate behaviour that addresses long-term risks and opportunities associated with climate change. Vicki Bakhshi, RI team member, serves on the Board.</td>
<td>2001</td>
</tr>
<tr>
<td>Global Network Initiative (GNI)</td>
<td>GNI seeks to safeguard freedom of expression and personal privacy against government restrictions. The protections are facilitated by a coalition of companies, investors, civil society organizations, academics, and other stakeholders.</td>
<td>2008</td>
</tr>
<tr>
<td>Eumedion</td>
<td>Eumedion is an independent foundation, whose objective is to maintain and further develop good corporate governance in the area of the responsibility of asset owners and asset managers established in the Netherlands.</td>
<td>2009</td>
</tr>
<tr>
<td>International Corporate Governance Network (ICGN)</td>
<td>Key network for monitoring global policy developments and best practice.</td>
<td>2007</td>
</tr>
<tr>
<td>Asian Corporate Governance Association (ACGA)</td>
<td>Essential source of information on Asian corporate governance.</td>
<td>2004</td>
</tr>
<tr>
<td>Global Investor Governance Network (GIGN)</td>
<td>Key network for monitoring global policy developments and best practice.</td>
<td>2006</td>
</tr>
<tr>
<td>Council of Institutional Investors (CII)</td>
<td>Focused on US governance. David Sneyd, RI team member, sits on the CII Corporate Governance Advisory Council.</td>
<td>1996</td>
</tr>
<tr>
<td>The UK Sustainable</td>
<td>Network focused on the UK sustainable investment market. Vicki</td>
<td>2000</td>
</tr>
<tr>
<td><strong>Investment &amp; Finance Association (UKSIF)</strong></td>
<td>Bakhshi, RI team member, chairs the Policy Committee.</td>
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</tr>
<tr>
<td><strong>Investor Forum</strong></td>
<td>Facilitates comprehensive, proactive engagement between companies and investors. The intention is to address mid- to long-term issues at an earlier stage and to identify solutions that enhance value.</td>
<td></td>
</tr>
<tr>
<td><strong>Responsible Investment Association (RIA)</strong></td>
<td>Canada’s membership association for Responsible Investment (RI). Members include mutual fund companies, financial institutions, asset management firms, advisors, consultants, investment research firms, asset owners, individual investors and others interested in RI.</td>
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</tr>
<tr>
<td><strong>Corporate Governance Advisory Committee (QCA)</strong></td>
<td>Independent membership organization comprising corporates and investors that champions the interests of small to mid-size quoted companies.</td>
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</tr>
<tr>
<td><strong>30% Club</strong></td>
<td>Campaigns for greater representation of women on company boards.</td>
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</tr>
<tr>
<td><strong>Investment Association</strong></td>
<td>Member of the Remuneration and Share Schemes Committee.</td>
<td></td>
</tr>
</tbody>
</table>


### 2.7. What is the total number of SRI assets under the company’s management?

€3,408 million as at 31.03.2019 (based on AuM in the Responsible Fund range and other dedicated ESG strategies).

Within the Responsible Fund range, we currently manage €2,755 million (as at 31.03.2019) in the following strategies:

- BMO Responsible Global Equity
- BMO Responsible Global Emerging Market Equity
- BMO Responsible UK Equity
- BMO Responsible UK Income
- BMO Responsible Sterling Corporate Bond
- BMO Responsible Euro Corporate Bond

We also offer the following ESG strategies:

- BMO Sustainable Opportunities Global Equity (AUM: €59 million, as at 31.03.2019)
- BMO Green Bond (AUM: €317 million, as at 31.03.2019)
- BMO Emerging Market Debt – screened (AUM: €88 million, as at 31.03.2019)
- BMO Women in Leadership (AUM: €24 million, as at 31.03.2019)
- BMO SDG Engagement Global Equity (AUM: €165 million, as at 31.03.2019)

### 3. General information about the SRI fund(s) that come under the scope of the Code

#### 3.1. What is (are) the fund(s) aiming to achieve by integrating ESG factors?

By integrating ESG factors, we aim to build an understanding of the fundamental factors across time shaping the risks and opportunities of the companies we invest in.

#### 3.2. What internal or external resources are used for ESG evaluation of the issuers who make
up the investment universe of the fund(s)?

Our in-house Responsible Investment team conducts in-depth research into every company considered for the Fund.

We also use ESG research providers to complement the in-house research. These include

- **MSCI** - MSCI ESG is our primary source for ESG data. We use ESG research providers as a starting point in our analysis, but make sure that our investment desks in collaboration with our ESG experts in the Responsible Investment team verify and complete the data with additional information gathered through in-house research, engagement, participation in industry groups and multiple research providers.

- **Institutional Shareholder Services (ISS)** - ISS supplies us with custom research based on our own in-house corporate governance guidelines (which are updated annually based on country-specific best practice standards). Research provided by ISS is used to inform our vote execution as well as company engagement.

- **Broker Research** – The team uses this content to stay on top of market trends, identify companies for engagement and to inform company, market or topic specific research.

- **Sustainalytics** – We use Sustainalytics for landmine and cluster munition screening.

- **Bloomberg** – Bloomberg terminals are used to perform qualitative as well as quantitative analysis on a multitude of topics. In particular, Bloomberg has proven useful for linking ESG with financial data to determine the materiality of particular ESG issues.

- **Non-Governmental Organisations (NGOs)** – Examples include Transparency International (anti-corruption), Oxfam, CERES and Human Rights Watch.

- **Other** - Our research is also informed by our networks that may provide briefings and publications, including the UN PRI, International Corporate Governance Network (ICGN) and Asian Corporate Governance Association (ACGA)

The Responsible Investment team also draws on an independent Responsible Investment Advisory Council, a group of experts who are leaders in their fields, bringing international experience across responsible investment, environmental, social and ethical issues. The Council is presided over by Justin Welby, Archbishop of Canterbury, and chaired by Howard Pearce, a leading figure in the responsible investment world.

### 3.3. What ESG criteria are taken into account by the fund(s)?

We have developed a detailed policy with product-based and conduct-based criteria to determine if stocks meet the criteria for inclusion in the fund. Each company considered for the portfolio is screened by the Responsible Investment team to ensure it meets our criteria. The Responsible Investment Strategies: Summary criteria outlines our ESG criteria including revenue thresholds and guidance on the positive and negative screens for this fund.

### 3.4. What principles and criteria linked to climate change are taken into account in the fund(s)?

The fund will exclude companies with ownership of geological reserves of oil, gas and coal and/or with involvement in exploration or production activities that have significant environmental impacts (e.g. oil sands) or in areas of high environmental sensitivity (e.g. Arctic)

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5 Reference to Article 173 of the French TECV Act see paragraphs 3 and 4 of Article D.533-16-1 of Chapter III of the French Legal Code):
https://www.legifrance.gouv.fr/affichCodeArticle.do?idTexte=LEGITEXT000006072026&idArticle=LEGIARTI00031793697
It will also exclude companies in high impact sectors that do not have comprehensive climate change strategies
that seek to measure and control their greenhouse gas emissions, as well as those in their supply chains, and
demonstrate an understanding of the impact of climate change on their business strategy.

3.5. What is the ESG analysis and evaluation methodology of the fund manager/fund
management company (how is the investment universe built, what rating scale is used etc.)?

Our investment process is structured so that only companies which have first been considered for investment by
the investment team members are submitted to the Responsible Investment team for screening. If a company is
approved for investment then it will be thoroughly analysed by the investment team. It is the output of our
fundamental analysis which forms the basis of portfolio construction.

All stocks considered for investment first undergo screening by members of the Responsible Investment team, to
determine if they meet the criteria for inclusion in the portfolio. The Responsible Investment team has created a
thorough and robust process to analyse companies to determine whether they meet the fund's criteria:

• The fund will exclude companies with exposure to any business activities deemed to be socially or
environmentally damaging, with particular tolerance thresholds. These excluded activities have adapted
over time with the development of major social and environmental issues.

• The fund will also exclude companies which do not meet sufficiently high standards in how they operate,
based on a detailed assessment of their policies and performance with respect to overall sustainability
management. The focus will vary by sector according to relevance and includes certain absolute
exclusions in company behaviour but is otherwise often a qualitative judgement. In order to make these
assessments, BMO Global Asset Management have established particular positions on a range of
relevant issues, such as climate change and what we consider to be progressive approaches to these
issues by companies. These positions are based on a range of inputs that include evolving international
norms and agreements, extensive primary research, including field visits and the input of our Responsible
Investment Advisory Council.

As a result of the screening process, there are structural biases, such as an underweight position relative to the
benchmark in extractive industries, but we do not consider it necessary to actively monitor the extent to which the
investment universe is restricted as a consequence of our robust investment process incorporating screening as
a key step. We are focused on identifying companies which meet the criteria with proven business models,
delivering consistent returns and stable cash flows, where management team members have proven themselves
to be responsible capital allocators with high standards of sustainability management.

3.6. How often is the ESG evaluation of the issuers reviewed? How are any controversies managed?

The screening criteria evolve over time, and there is not a time period by which the entire screening criteria are
updated in one change. Each criterion may be updated on a case-by-case basis after careful consideration by the
Responsible Investment team, and advice provided by the Responsible Investment Advisory Council. An approved
company is reappraised against the screening criteria through quarterly monitoring, and should a company
subsequently fail the criteria, there is a period of six months during which the portfolio management team must
divest of the holding.

Companies that have cleared the exclusion criteria and are hence acceptable for investment will maintain this
rating for four years. After this time, compliance with the criteria will be reviewed.
The Responsible Investment team has a quarterly monitoring system to identify:

- Changes to business e.g. through mergers and acquisitions
- Whether the criteria continue to be met by the company (ethical, environmental and social)
- Any controversies that may affect the company rating (e.g. mis-selling, environmental damage or corruption).

**Handling controversies**

We engage with companies that are violating the UN Global Compact principles.

The process involves the following steps:

- We analyse our aggregated investment holdings (equity and corporate bonds) list against UNGC, ILO and Human Rights - related research provided by MSCI ESG on a quarterly basis. This flags to us companies which are involved in controversies which breach the UNGC principle according to MSCI ESG’s methodology. Their ESG and norms-related Controversies service provides timely and consistent assessments of ESG controversies involving publicly traded companies and fixed income issuers. The evaluation framework used is designed to be consistent with international norms represented in numerous widely accepted global conventions, including the United Nations Guiding Principles on Business and Human Rights, the ILO Conventions, and the UN Global Compact Principles. MSCI ESG Research analysts investigate and assess controversies involving the impact of company operations and/or products and services that allegedly violate national or international laws, regulations, and/or commonly accepted global norms. This research is conducted through thorough analysis of company public documents, media sources, government data and nongovernmental organization (NGO) publications. MSCI's core Controversy Service covers the ACWI IMI index of approximately 8,500 companies.

- This research is then delivered to BMO Global Asset Management analysts. We use the UNGC principles as a framework, to identify investee companies that may pose significant reputational or regulatory risk. The principles do not cover all environmental, social and ethical risks businesses face, such as product safety and quality, and we therefore also look at whether investee companies are in breach of the International Labour Organisation (ILO) and the Universal Declaration of Human Rights (Human Rights). Companies which are in breach of one or more of the principles are analysed by the Responsible Investment team on a quarterly basis.

- Each company with a controversy flagged as a breach is then analysed individually by sector and theme specialists on the Responsible Investment team. We study the nature of the controversy and its cause. We also look at the scale of the controversy including how many people were affected and the extent of environmental and social damage caused. Above all, our analysis looks at what measures the company has put in place to respond to the issue and ensure a similar incident will not occur again.

- An assessment is then made on whether we classify the controversy as a breach of a UNGC principle from our perspective. Our evaluation seeks to determine whether the company has robust measures in place for dealing with issues that arise, and to guarantee the company is well positioned to avoid breaching the principles in the future. This prepares the ground for deciding what our next steps should be.

- We identify which of these companies breaching UNGC principles merits engagement. A shortlist of engagement opportunities is created. The list is discussed amongst the team and the relevant engagement specialist proposes what methods and tactics to use to best engage the company. This will take into consideration a number of factors such as whether we are already engaging the company on this issue, the extent of client holdings in the company, and the likelihood of engagement success.
4. Investment process

4.1. How are the results of the ESG research integrated into portfolio construction?

The output of the fundamental analysis forms the basis of portfolio construction. The fund management team considers ESG factors directly in the analysis of the business model and in the assessment of management quality, and flex assumptions and discount rates based on these factors where appropriate. Portfolio sizing is driven by combination of risk, conviction, upside and role in portfolio.

4.2. How are criteria specific to climate change integrated into portfolio construction?

The funds will exclude companies with ownership of geological reserves of oil, gas and coal and/or with involvement in exploration or production activities that have significant environmental impacts (e.g. oil sands) or in areas of high environmental sensitivity (e.g. Arctic). As a result of this exclusion policy, we are structurally underweight to extractives.

The funds will also exclude companies in high impact sectors that do not have comprehensive climate change strategies that seek to measure and control their greenhouse gas emissions, as well as those in their supply chains, and demonstrate an understanding of the impact of climate change on their business strategy.

4.3. How are the issuers that are present in the portfolio, but not subject to ESG analysis evaluated (not including mutual funds)?

Please specify how much the funds can hold.

Not applicable. All stocks considered for investment first undergo screening by members of the Responsible Investment team, to determine if they meet the criteria for inclusion in the fund.

4.4. Has the ESG evaluation or investment process changed in the last 12 months?

There have been no material changes in the last 12 months, however do continue to make incremental evolutionary enhancements to the process as a matter of course.

4.5. Is a part of the fund(s) invested in entities pursuing strong social goals/social enterprises?

Yes. We aim to give investors access to an ethical portfolio of high-quality stocks with positive sustainability characteristics. Examples include:

- John Laing: invests in social and environmental infrastructure and renewable energy projects. We like companies that are solution providers.
- Countryside Properties: builds affordable homes in partnership with Housing Associations and Local Authorities.

4.6. Does (do) the fund(s) engage in securities lending activities?

Yes, the fund is permitted to lend securities. Below is a summary of our collateral parameters:

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6 Reference to Article 173 of the French TECV Act and HLEG recommendations on DISCLOSURE
7 Reference to Article 173 of the French TECV Act and the TCFD recommendations (delivering on investor and stakeholder demands for climate-related information)
- Non-Cash Collateral Only
- Governments and Sovereign Debt versus equity loans -105%
- Equity Indices -105% minimum for six main indices (can request a minimum of 108%).
- Fixed income loans versus fixed income collateral (sovereign and corporate debt) – 102% same currency 105% cross currency margin
- All collateral indemnified
- Collateral received against Fixed Income consists of Sovereign debt as per SLAA, Corporate Bonds rated at least Investment Grade (BBB-) and UK Equity FTSE 250 DBV’s.

**If so,**

(i) *is there a policy in place to recall the securities so as to exercise the voting rights?*
Yes. Given sufficient notice (usually 5 days), we can recall the securities in time to exercise voting rights. This timescale is flexible and can be narrowed in times of urgency (AGM / EGM) etc

(ii) *does the process for selecting the counterparty(ies) integrate ESG criteria?*
We have been integrating Responsible Investment into the counterparty risk management process for over 5 years. All new counterparties are subject to a due diligence process in which the counterparties’ legal and regulatory status, financial strength, operational capability and anti-money laundering bona fides are verified and verified. The counterparties’ credit score (as assigned by our Credit Analysts) is also considered. One of the factors considered in the calculation of the credit score is the Environmental Social and Governance (ESG) score. The ongoing collaboration and analysis conducted by the Responsible Investment and Credit team is critical in assigning an ESG score.

Additionally, our Responsible Investment team engages with key counterparties on a regular basis (85+ times in the last 2 years). Topics and themes covered include: governance, culture and business ethics, risk and compliance and AML. Outcomes have included: executive compensation reform, changes in board composition and improvements in risk and compliance mechanism.

4.7. **Does(d) the fund(s) use derivative instruments?**
   If so, please describe
   (i) their nature;
   (ii) their objectives;
   (iii) the potential limits in terms of exposure;
   (iv) if appropriate, their impact on the SRI nature of the fund(s).

   No.

4.8. **Does (d) the fund(s) invest in mutual funds?**
   If so, how do you ensure compatibility between the policy for selecting mutual funds and the SRI policy
5. **ESG controls**

5.1. **What internal and/or external control mechanisms are in place to ensure compliance of the portfolio with the ESG rules on managing the fund(s) as defined in section 4?**

The Responsible Investment team has a quarterly monitoring system to identify:

- Changes to business e.g. through mergers and acquisitions
- Whether the criteria continue to be met by the company (ethical, environmental and social)
- Any controversies that may affect the company rating (e.g. mis-selling, environmental damage or corruption).

The approved list of companies is hard-coded into the dealing system to avoid inadvertently investing in unacceptable securities.

6. **Impact measures and ESG reporting**

6.1. **How is the ESG quality of the fund(s) assessed?**

- We maintain a list of the companies that are acceptable for the fund (i.e. meet the screening criteria) and those that are not.
- On a quarterly basis, the Responsible Investment team produces an ESG portfolio analytics report. This report contains data on:
  - Companies with highest and lowest ESG scores in the universe
  - Largest upward and downward momentum over the previous quarter, including new controversies
  - ESG data on all companies in the universe including Responsible Investment summary analysis paragraph where available
- We map the activities of companies we invest in to the SDGs, using an in-house methodology. We have assessed the connection between our strategy and the Sustainable Development Goals, based on an analysis of the core business mandate of each investee company. Considerations such as revenue, strategy and growth in key business units determined whether a company aligns directly to a specific SDG.

6.2. **What ESG indicators are used by the fund(s)?**

Carbon performance, gender diversity, water consumption

6.3. **What communication resources are used to provide investors with information about the SRI management of the fund(s)?**

As well as regular interactions with our client base, the following documentation is available through our company website ([https://www.bmogam.com/gb-en/intermediary/capabilities/responsible-investing/](https://www.bmogam.com/gb-en/intermediary/capabilities/responsible-investing/)):

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8 Reference to Article 173 of the French TECV Act
9 Reference to Article 173 of the French TECV Act
Annual Responsible Investment Review: This is an annual report (https://www.bmogam.com/wp-content/uploads/2019/04/responsible-investment-2018-review.pdf) which reviews our responsible investment activities and achievements over the year. Topics include:

- Investor engagement and engagement outcomes for the year;
- Voting and corporate governance activity over the year;
- Public policy interactions;
- A discussion of themes to watch in the upcoming year.

Responsible Funds Summary Criteria: Each company considered for the portfolio is screened by the Responsible Investment team to ensure it meets our criteria. This document (https://www.bmogam.com/gb-en/intermediary/wp-content/uploads/2018/11/cm18407-ri-summary-criteria_v2.pdf) outlines our exclusion criteria including revenue thresholds and guidance on the positive and negative screens for this strategy.

Webinars
ESG issues, including engagement insights, are also discussed and tackled during quarterly webinars. Available via our website, last quarters’ webinar, titled ‘Investor engagement: what to expect in 2019’, was hosted by Vicki Bakhshi:

6.4. Does the fund management company publish the results of its voting and engagement policies?10
If so, please include links to the relevant activity reports.

Voting:
We believe in a transparent approach to responsible investment and publish all our voting decisions, as well as the rationale for these. We have been publishing statistics of our annual voting activities for the past 16 years. All of our votes are publicly disclosed on the following webpage the day after the shareholder meeting with voting records available back to 2012:


Engagement:
In support of our engagement activity we publish an annual Responsible Investment Review. The report contains an overview of our engagement activities, outcomes during the year and upcoming themes, and can be found on our website:


PRIVATE AND CONFIDENTIAL
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10 Reference to Article 173 of the French TECV Act and the HLEG recommendations on GOVERNANCE
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