



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 second 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.

June 2021

Eurosif classification of Sustainable and Responsible Investment¹ 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.

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 circumstances². 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

² Global Impact Investing Network (GIIN), "What is Impact Investing?", <http://www.thegiin.org/cgi-bin/iowa/investing/index.html>, 2012

1. List of funds covered by the Code

| Name of the fund(s): BMO Sustainable Multi-Asset Income Fund | | | | | |
|--|---|--|--------------------------------|--|--|
| Dominant/preferred SRI strategy (Please choose a maximum of 2 strategies) | Asset class | Exclusions standards and norms | Fund capital as at 31 December | Other labels | Links to relevant documents |
| <input type="checkbox"/> Best-in-Class Investment section <input checked="" type="checkbox"/> Engagement & Voting <input type="checkbox"/> ESG Integration <input type="checkbox"/> Exclusions <input type="checkbox"/> Impact Investing <input type="checkbox"/> Norms-Based Screening <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Leading to exclusions <input checked="" type="checkbox"/> Leading to risk management analysis/engagement <input checked="" type="checkbox"/> Sustainability Themed | <p>Passively managed</p> <input type="checkbox"/> Passive investing - core benchmark: specify the index tracking <input type="checkbox"/> Passive investing - ESG/SRI benchmark: specify the index tracking | <input checked="" type="checkbox"/> Controversial weapons <input type="checkbox"/> Alcohol <input checked="" type="checkbox"/> Tobacco <input checked="" type="checkbox"/> Arms <input checked="" type="checkbox"/> Nuclear power <input type="checkbox"/> Human rights <input type="checkbox"/> Labour rights <input type="checkbox"/> Gambling <input type="checkbox"/> Pornography <input type="checkbox"/> Animal testing <input type="checkbox"/> Conflict minerals <input type="checkbox"/> Biodiversity <input type="checkbox"/> Deforestation <input checked="" type="checkbox"/> CO2 intensive (including coal) <input type="checkbox"/> Genetic Engineering <input checked="" type="checkbox"/> Global Compact <input type="checkbox"/> OECD Guidelines for MNCs <input type="checkbox"/> ILO Conventions <input type="checkbox"/> Other | €95.9mn | <input type="checkbox"/> French SRI label <input type="checkbox"/> French TEEC label <input type="checkbox"/> French CIES label <input type="checkbox"/> Luxflag Label <input type="checkbox"/> Austrian Ecolabel <input checked="" type="checkbox"/> Other (Towards Sustainability label – Febelfin) | (KIID) Prospectus Management report Financial and non-financial reporting Corporate presentations Other (please specify) Please refer to Key Documents and Literature via the following link: https://www.bmogam.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/>

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 21-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. 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, and 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, and written correspondence and e-mails. 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, so that 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 policy³.

Our approach towards responsible ownership and integrating ESG-criteria in our investment process is described in our [Responsible Ownership Approach](#). The guidelines cover:

- integrating analysis of relevant ESG issues into investment processes, as appropriate
- 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 financial, social and environmental value creation
- voting in line with our corporate governance guidelines across global holdings
- taking a transparent approach to our responsible investment activities, both 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.

All updates to our responsible investment approach and related policies are conducted by the Global Investment Committee (GIC), the members of which include our Global CIO, CIO North America and other senior investment representatives from across BMO Global Asset Management representing our respective regulated entities.

2.4. How are ESG risks and opportunities - including those linked to climate change - understood/taken into account by company?⁴

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 investment strategies.

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

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)

- Publishing our engagement [strategy document](#), summarising our approach to tackling climate change.
- 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** – for example our Responsible Funds range, which includes products in equity and fixed income.
- 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 two dedicated Green Bond 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\$54trn 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 as well as interventions on specific policies such as European emissions trading reforms.
- **Transparency**, including the publication of carbon footprints for our Responsible Funds as part of wider impact reporting. BMO Global Asset Management has published its own TCFD statement.
- BMO GAM has joined the **Net Zero Asset Managers initiative** to target net zero greenhouse gas emissions by 2050 or sooner across all assets under management

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 21-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, 2019 and 2020 Investment Week Sustainable & ESG Investment Awards winner for Best Sustainable & 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 because we believe that 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**; including team members originally from Hong Kong, Continental Europe, Colombia and North America with multiple language capabilities to effectively engage companies internationally.

- **Issue specialists**, covering in particular corporate governance, climate change, human rights, business ethics and labour standards;
- Eight members of the team conduct both **governance and voting** – with voting split by regional responsibility.

BMO Sustainable Multi-Asset Income Fund

The BMO Sustainable Multi-Asset Income Fund is run by our highly experienced, award-winning Multi-Asset team; a team which forms one of the key pillars upon which our business strategy is based, and one that boasts outstanding experience and expertise. The team has strong credentials in strategic and tactical asset allocation, instrument and manager selection, as well as risk and portfolio management.

The lead portfolio manager for the Fund is Simon Holmes, a Director and Portfolio Manager in the Multi-Asset team. The team has managed multi-asset ESG products since launching the Friends Life Stewardship Managed Fund in 1998. More recently the team has developed and now manages several ESG-related funds and mandates, led primarily by Simon and Paul Niven. Beyond BMO, Simon has sat on a CFA committee on Capital Allocation that focused on best practice in stewardship and sustainability in investment. He joined BMO in September 2007. Simon has experience across credit, foreign exchange, fixed income, equities and alternatives. In previous roles, Simon has worked at McKinsey & Co., Salomon Smith Barney, Barclays Capital and Daiwa, after starting his career at Tokyo-Mitsubishi in 1996. He has a BSc (Hons) in Natural Sciences from the University of Durham and an MBA from INSEAD Business School. He is also a CFA charterholder.

The senior members of the team have investment experience across a broad range of asset classes and are able to draw on the resources of our specialist investment teams within BMO Global Asset Management; to ensure breadth and depth of input to our investment process. Specifically, within the team we have experts on risk allocation with specialisms comprising equities, fixed income and alternatives. In addition, we have resources focused on portfolio construction and implementation (covering physical and synthetic investment) as well as macro strategists and portfolio and risk analysts. The UK team is also able to leverage from the expertise of the wider multi-asset capability within the group, consisting of an additional 17 professionals located in Chicago and Toronto. The UK team is outlined in the table below, which includes years of experience and areas of responsibility.

| Name | Title | Years in Industry | Years at the Firm |
|-----------------|---|-------------------|-------------------|
| Paul Niven | Managing Director, Portfolio Manager and Head of Portfolio Management | 25 | 25 |
| Steven Bell | Managing Director, Portfolio Manager & Chief Economist | 37 | 8 |
| Keith Balmer | Director, Product Specialist | 21 | 5 |
| Peter Hewitt | Director, Portfolio Manager | 42 | 21 |
| Simon Holmes | Director, Portfolio Manager | 21 | 14 |
| Robert Plant | Director, Portfolio Manager | 16 | 8 |
| Andrew Smith | Director, Multi-Asset Solutions, Portfolio Manager | 18 | 2 |
| Chris Langford | Senior Associate, Assistant Portfolio Manager | 22 | 22 |
| Eloise Robinson | Associate, Analyst | 4 | 4 |
| Average | | 23 | 12 |

Source: BMO Global Asset Management (EMEA). As at 31 March 2021. Biographies for the team have been included in Appendix 1.

Collaboration with Responsible Investment team

Our award-winning, 21-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 strategy. Furthermore, they work with the Multi-Asset team to fully integrate these risks and opportunities into

the fundamental valuation of each business. The Responsible Investment team is then responsible for managing ongoing engagement and proxy voting for all companies owned in the strategy.

2.6. Is the company involved in any RI initiatives?

| General Initiatives | Environmental/Climate Initiatives | Social Initiatives | Governance Initiatives |
|--|---|--|--|
| <input type="checkbox"/> ECCR - Ecumenical Council for Corporate Responsibility <input type="checkbox"/> EFAMA RI WG <input type="checkbox"/> European Commission's High-Level Expert Group on Sustainable Finance <input checked="" type="checkbox"/> ICCR - Interfaith Center on Corporate Responsibility <input type="checkbox"/> National Asset Manager Association (RI Group) <input checked="" type="checkbox"/> PRI - Principles For Responsible Investment <input checked="" type="checkbox"/> SIFs - Sustainable Investment Fora <input type="checkbox"/> Other (please specify) | <input checked="" type="checkbox"/> CDP - Carbon Disclosure Project (please specify carbon, forest, water etc.) <input type="checkbox"/> Climate Bond Initiative <input checked="" type="checkbox"/> Green Bond Principles <input checked="" type="checkbox"/> IIGCC - Institutional Investors Group on Climate Change <input type="checkbox"/> Montreal Carbon pledge <input type="checkbox"/> Paris Pledge for Action <input type="checkbox"/> Portfolio Decarbonization Coalition <input type="checkbox"/> Other (please specify) | <input checked="" type="checkbox"/> Access to Medicine Foundation <input checked="" type="checkbox"/> Access to Nutrition Foundation <input checked="" type="checkbox"/> Accord on Fire and Building Safety in Bangladesh <input type="checkbox"/> Other (please specify) | <input checked="" type="checkbox"/> ICGN - International Corporate Governance Network <input type="checkbox"/> Other (please specify) |

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.

| Organization / Initiative | Key Areas of Focus | Start date |
|---|---|------------|
| ICCR - Interfaith Center on Corporate Responsibility | Coalition of over 300 global institutional investors currently represents more than \$500 billion in managed assets focusing on shareholder advocacy. | 2020 |
| Investor Alliance on Human Rights | Investor initiative with the focus on development of tools for investors on human and labour rights aspects of investments, as well as engagement working groups | M2020 |
| Platform Living Wage Financials | Coalition of financial institutions that encourages and monitors investee companies to address the non-payment of living wage in global supply chains. | 2020 |
| UN Principles for Responsible Investment (UN PRI) | The world's leading organization for responsible investors. We were a founder signatory. | 2006 |
| Carbon Disclosure Project (CDP) | 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. | 2000 |
| Institutional Investors Group on Climate Change (IIGCC) | 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. | 2001 |
| Global Network Initiative (GNI) | 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. | 2008 |
| Eumedion | 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. | 2009 |

| | | |
|---|---|------|
| International Corporate Governance Network (ICGN) | Key network for monitoring global policy developments and best practice. | 2007 |
| Asian Corporate Governance Association (ACGA) | Essential source of information on Asian corporate governance. | 2004 |
| Global Investor Governance Network (GIGN) | Key network for monitoring global policy developments and best practice. | 2006 |
| Council of Institutional Investors (CII) | Focused on US governance. David Sneyd, RI team member, sits on the CII Corporate Governance Advisory Council. | 1996 |
| The UK Sustainable Investment & Finance Association (UKSIF) | Network focused on the UK sustainable investment market. Vicki Bakhshi, RI team member, chairs the Policy Committee. | 2000 |
| Investor Forum | 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. | 2005 |
| Responsible Investment Association (RIA) | 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. | 2016 |
| Corporate Governance Advisory Committee (QCA) | Independent membership organization comprising corporates and investors that champions the interests of small to mid-size quoted companies. | |
| 30% Club | Campaigns for greater representation of women on company boards. | |
| Investment Association | Member of the Remuneration and Share Schemes Committee. | |

Source: BMO Global Asset Management, 31 March 2021.

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

€9,426 million as at 31.03.2021 (based on AuM in the Responsible Fund range and other dedicated ESG strategies).

Within the Responsible Fund range, we currently manage €5,117 million (as at 31.03.2021) in the following strategies:

- BMO Responsible Global Equity
- BMO Responsible Global Emerging Market Equity
- BMO Responsible UK Equity Growth
- BMO Responsible UK Income
- BMO Responsible Sterling Corporate Bond
- BMO Responsible Euro Corporate Bond
- BMO LGM Responsible China A-Shares Equity Fund
- BMO LGM Responsible Asia Fund

We also offer the following dedicated ESG strategies:

- BMO Sustainable Opportunities Global Equity
- BMO Sustainable Opportunities European Equity
- BMO Sustainable Opportunities Canadian Equity Fund
- BMO Green Bond
- BMO Emerging Market Debt – screened
- BMO Women in Leadership
- BMO SDG Engagement Global Equity

- BMO Sustainable Multi Asset

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?

Sustainable investing is gaining increasing relevance and prominence as investors understand that environmental, social and governance issues can have a material impact on the long-term performance of the companies they invest in. There is a growing awareness of the potential effects of issues such as climate change on companies and markets. While there are increasing risks to be avoided, there are also new opportunities to be captured for those who are more forward thinking in responding to sustainability challenges.

More and more investors want to align financial decisions with their values, as adopting a more sustainable approach makes sense from an investment perspective too. Investors want both positive investments and positive change for the world we all live in. At BMO Global Asset Management, our expertise enables us to offer the best of both worlds.

The BMO Sustainable Multi-Asset Income Fund is designed to offer investors reliable distribution payments together with scope for capital growth through an actively and responsibly managed multi-asset portfolio.

The Multi-Asset team works together with the dedicated environmental, social and governance (ESG) experts on the Responsible Investment team to identify appropriate corporations and policies for the strategy. Like all other Responsible and Sustainable strategies run by BMO Global Asset Management, the fund will map every one of its holdings to the UN Sustainable Development Goals, providing transparency to investor on how the fund is positively aligned.

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 controversial weapons screening.

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

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

The BMO Sustainable Multi-Asset Income Fund aims to deliver a consistent level of income and capital growth through investment in a portfolio of traditional and alternative assets and strategies, by identifying and managing sustainability-related risks and opportunities.

The identification of financially material environmental, social, and governance (ESG) issues forms part of our routine investment analysis (“ESG integration”), helping us to manage risk and support long-term returns. In addition to this, we will also seek to make a positive impact on society and the environment while at least meeting the criteria specified below.

The overarching sustainability philosophy of the fund is to “Avoid; Invest; Improve”:

- **Avoid** – we have a set of exclusion criteria setting threshold standards to avoid investment in socially or environmentally damaging products or unsustainable business practices.
- **Invest** – we invest in companies providing sustainability solutions and/or companies making a positive contribution to society and/or the environment.
- **Improve** – we engage with companies we invest in on significant ESG issues with most relevance to their business, so as to reduce risk, improve performance, encourage best practice and underpin long-term investor value. We believe that this active ownership is part of our duty as an investor acting in the best interests of our clients, and as a participant in the global financial system.

‘Avoid’ (exclusions policy)

Consistent with the goal to seek to make a positive impact on society and the environment, we have developed an exclusion policy to set threshold standards. We apply this policy to all holdings in funds over which we have full discretion. We will monitor the universe of holdings on an ongoing basis, and any position held by a fund that no longer qualifies must be sold within the following six months.

Product-based exclusions⁵

- **Weapons⁶** – We do not invest in companies that manufacture weapons or weapons systems.⁷

⁵ Product-based exclusions are hard exclusions.

⁶ Revenue threshold for controversial weapons is set at 0%, threshold for conventional weapons is 1%, threshold for components is 5%.

⁷ Companies that manufacture weapons, components of weapons, or weapons system, i.e. conventional weapons, biological/chemical weapons systems, blinding laser weapons, depleted uranium weapons, incendiary weapons, non-detectable fragments and nuclear weapons.

- **Tobacco**⁸ – We do not invest in companies producing tobacco or companies that derive more than 5% revenues from products that contain tobacco or from the wholesale trading of tobacco products.
- **Fossil fuels**
 - o We do not invest in companies with fossil fuel reserves, covering metallurgical coal, thermal coal, conventional oil, shale oil, oil sands, natural gas and shale gas.
 - o We exclude electricity utilities with a carbon intensity of **>393 gCO₂/kWh**⁹, independent of its fuel source.
 - o We will exclude electricity utilities with **expansion plans that would increase their negative environmental impact or that are contrary to a below 2 degrees scenario** and electricity utilities **constructing new coal-fired power stations and/or nuclear power stations**.
 - o We exclude operators of nuclear power plants.
 - o We exclude companies with revenues above 5% generated from the production of essential parts for nuclear power plants.
- **Uranium mining**: We exclude all companies operating active uranium mines.
- **Forward contracts on agricultural commodities**: We do not consider these in scope for investment

Conduct-based exclusions

- **UNGC breaches** – We exclude companies with breaches of the UN Global Compact principles¹⁰.
- **Weak corporate ESG performers**¹¹ – Using our in-house ESG rating methodology, we exclude the companies scoring at or below 25/100 in their ESG rating unless sector experts from the Responsible Investment team opine positively on their ESG management¹².

Sustainability in sovereign bonds

- We will exclude countries that:
 - o are classified as “not free” according to the current Freedom House ranking.
 - o are not legally bound by the UN Convention on Biological Diversity.
 - o are not legally bound by the Paris Convention on Climate Change (COP-21).
 - o score below 40/100 in the current Transparency International’s Corruption Perceptions Index.
 - o are not legally bound by the Nuclear Non-Proliferation Treaty.

Further aspects considered:

- **Biodiversity**: We expect companies to minimise negative impact on biodiversity.
- **Water Use**: We expect companies to comply with national regulations and international agreements regarding managing water consumption.
- **Taxation**: We expect companies to pay fair and appropriate taxes, and transparently report their taxes.
- **Oppressive regimes (government and company level)**: We use our country scoring approach, which incorporates political and civil rights, to assess whether a holding is connected to an oppressive regime. See also “Sustainability in sovereign bonds” above.
- **Governments allowing the death penalty**: no specific policy considered.

Currency exposures

- Currency exposures may arise from securities held within the portfolio if not hedged

⁸ Revenue threshold set at 1%.

⁹ This is consistent with a ‘below 2 degrees scenario’. Max. gCO₂/kWh will decrease each year. For 2022 it will be 374 gCO₂/kWh.

¹⁰ The UN Global Compact are 10 principles businesses should follow and incorporate in order to meet their basic responsibilities to people and planet, which fall under 4 broad headings (Human Rights, Labour, Environment and Anti-Corruption). See [here](#) for full details

¹¹ ESG ranking is used as a flag for further qualitative analysis

¹² In-house ESG rating methodology uses third party ESG data as an input.

- Additional currency exposures can be added but must be consistent with the sovereign bond criteria, with the exception of the reserve currencies (Euro, US Dollar, GB Pound, Japanese Yen). This exception will be capped at 30% of the portfolio under normal market conditions, however may be temporarily exceeded under extraordinary market conditions.
- Currency exposures may be taken via currency derivatives (forwards, futures and options) or cash or public debt instruments

'Invest' (targeted investment in sustainability leadership)

Core to all BMO GAM sustainable strategies is the proactive allocation to investments whose activities are oriented to providing sustainability solutions, i.e. with some positive impact on societies and the environment.

The majority of revenues from an issuer held in the portfolio will contribute to key sustainability challenges and opportunities such as:

1. Health and wellbeing:

- o Companies improving the nutritional value of food and drinks
- o Companies improving the quality and/or accessibility of health products and services
- o Companies providing goods and services that promote health and well-being

2. Sustainable Finance

- o Companies improving financial inclusion
- o Companies providing access to finance
- o Companies providing financial services to support SMEs
- o Companies providing insurance services

3. Energy transition

- o Companies providing product/services which reduce fossil fuel dependence
- o Companies increasing renewable energy production
- o Companies enabling transition to EV
- o Companies improving fuel efficiency for transportation vehicles

4. Sustainable cities and infrastructure

- o Companies building and maintaining affordable housing
- o Companies supplying goods and services to enable building and maintaining affordable housing
- o Companies building and maintaining low-carbon commercial buildings
- o Companies enabling the provision of public transport services
- o Companies providing infrastructure to enable access to electricity, telecommunication services
- o Companies supporting economic development, mobility, health and well-being through sustainable infrastructure development

5. Resource efficiency

- o Companies enabling recycling
- o Companies providing products/services which reduce waste
- o Companies with ambitious and leading practices to mitigate their environmental and social impacts
- o Companies improving water quality through water and wastewater treatment
- o Companies providing products and services to increase water-use efficiency
- o Companies enabling the reduction of resources used in the production of products

6. Digital empowerment, connection, and protection

- o Companies providing technologies that empower people to make better decisions for better environmental or societal outcomes
- o Companies providing technologies that democratize digital access
- o Companies providing technologies to improve safety
- o Companies providing technologies to improve connectivity (incl infrastructure)
- o Companies providing technologies to mitigate the environmental impacts of business activities (i.e. improving efficiency)

7. Education

- Companies providing high-quality education and/or professional training
- Companies upgrading education facilities

We also make reference to the framework of the Sustainable Development Goals (SDGs) in identifying investments making a positive impact on society and the environment¹³.

Our 'Invest' approach applies to both traditional assets (e.g. equity and debt securities) and alternative opportunities, which may include areas such as social housing, renewable energy or microfinance. Sovereign bonds are not being evaluated against "invest" themes.

'Improve' (encouraging positive change by active ownership)

All holdings within SMAIF will be engaged based on a prioritisation process established by BMO GAM's Responsible Investment team to improve their environmental, social, and governance performance.

The BMO GAM-wide prioritisation process has three elements:

1. Priority companies: a set of companies assessed as being ESG laggards with enhanced need for engagement.
2. Engagement projects: thematic projects assessed as most relevant in the responsible investment space, with cross-industry engagement over a longer period (1-3years)
3. Event driven engagement: prior to AGMs or as a reaction to current events (money laundering, environmental pollution etc)

For all companies to be engaged, engagement objectives and timelines will be agreed. Escalation strategies, in case objectives are not met in time, will be discussed with FMs.

Engagement will be executed by BMO GAM's Responsible Investment team, by the fund managers, or jointly. Engagements will be documented in an internal data base, and regular reporting to clients on engagement and impact metrics will be made available.

3.4. What principles and criteria linked to climate change are taken into account in the fund(s)?¹⁴

Our investment specialists and Responsible Investment team work together to assess the true sustainable development impact of each business; both positive and negative. The products and services provided to customers are crucial to that assessment but understanding a business's impact on society and the environment goes beyond the products and services. We ensure that we look at contribution to all stakeholders, from their supply chain and direct employees, through to the business' involvement in the industry around them, and the extent to which they are actively progressing ESG issues within the industry.

Within this sustainability analysis we also consider the company's contribution towards the Sustainable Development Goals (SDGs) regarding both product and conduct. The SDGs, developed by the United Nations in 2015 provide a clear framework through which governments, businesses and other stakeholders can view sustainability challenges and how they may be addressed. With these goals, SDG13 is focussed on climate action.

¹³ The 17 SDGs were developed in 2015 by the UN and cross-industry stakeholders and endorsed by all 193 member states. The SDGs set out a roadmap towards a more sustainable global economy and society by 2030. See [here](#) for full details

¹⁴Reference 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?cidTexte=LEGITEXT000006072026&idArticle=LEGIARTI000031793697>

The fund is screened for its carbon intensity, and it is at the fund manager's discretion to adjust stock selection to outperform the carbon intensity of the fund's composite reference benchmark.

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.)?

Within underlying asset classes our investment specialists seek to identify the best opportunities. When picking stocks, they implement clear screening criteria around defined product and conduct-based criteria. As well as avoiding damaging or unsustainable practices they also aim to emphasise those that make a more positive contribution.

Equities

We find a rich source of ideas comes from considering long-term social and environmental themes, and we believe companies that are contributing to solutions to key sustainability challenges and building successful business models around this will see a long-term tailwind to their growth opportunities. The identification of themes helps to focus our analytical efforts rather than imposing a strict thematic structure on the portfolio. Additionally, we try to look for companies that have the potential to show meaningful improvement in how they manage key ESG issues.

Following idea generation, the Global Equities team and Responsible Investment team work together to assess the true sustainable development impact of the business; both positive and negative. The products and services provided to customers are crucial to that assessment but understanding a business's impact on society and the environment goes beyond the products and services. We ensure that we look at contribution to all stakeholders, from their supply chain and direct employees, through to the business' involvement in the industry around them, and the extent to which they are actively progressing ESG issues within the industry.

Within this sustainability analysis we also consider the company's contribution towards the Sustainable Development Goals (SDGs) regarding both product and conduct. The SDGs, developed by the United Nations in 2015 provide a clear framework through which governments, businesses and other stakeholders can view sustainability challenges and how they may be addressed.

The team utilises a number of tools to flesh out key ESG risks and opportunities:

- The primary source of external ESG data is Morgan Stanley Capital International (MSCI) ESG Research ratings and analysis. The MSCI ESG approach identifies key issues by industry for each company and rates companies on environmental, social and governance performance, both in absolute terms and relative to their specific industry. While ESG data quality has improved over time, it is still not perfect. We find the depth of the analysis often lacking, and therefore an insufficient resource on its own.
- The RI team's proprietary BMO ESG score which builds on the MSCI ESG score by correcting some of the fallacies. It applies the team's views on different industries and corrects for environmental and social issues.
- The Global Equity team's own assessment: this is our own fundamental view on material risks and opportunities facing a company, whilst also taking into account the RI team's analysis of ESG considerations and engagement efforts. This analysis is compiled within a "Sustainability Tear Sheet", with insights directly integrated into the fundamental analysis.

The input from the Responsible Investment team, whether through informal conversations or periodical publications such as their 'ESG Viewpoint', provides an additional independent oversight and an objective assessment of the ESG credentials of the company and the industry it operates in.

When it comes to valuation, we place particular emphasis on cash flows as we believe these provide the most rigorous base for analysis of the underlying financial strength, and therefore quality, of any company. Discounted cash flow models (DCFs) are a key component of our valuation work to determine a 'conservative assessment of the intrinsic value' of a share price (CAIV). DCFs are also an important tool to help us determine the margin of safety in a stock by looking at what is implied in the current share price.

Here, ESG factors are considered directly in the analysis of the business model and the assessment of management quality. We factor them into the valuation by flexing assumptions and discount rates as appropriate. For example, we may flex revenue or profitability assumptions across different outcomes. We will also reflect ESG risks and opportunities through our proprietary "alternate weighted average cost of capital" (ALT-WACC) used as a discount rate within our DCF analysis. Within the ALT-WACC, we assess various factors, both operational and ESG, and this provides an aggregate assessment of quality, where higher quality companies warrant a lower discount rate applied to the DCF, which ceteris paribus drives a higher intrinsic valuation.

At the end of this process, a formal investment research note is produced by the analyst and discussed with the wider team. Stocks researched by the team are rated 1 (most positive), 2, or 3 (most negative). The ratings are active with no neutral rating, determined by the combination of margin of safety and upside to their 'intrinsic value' and the level of confidence we have in the quality of the business. Our active universe consists of the stocks rated by the team and portfolios are constructed bottom up from this rated universe.

Fixed Income – Corporate bonds

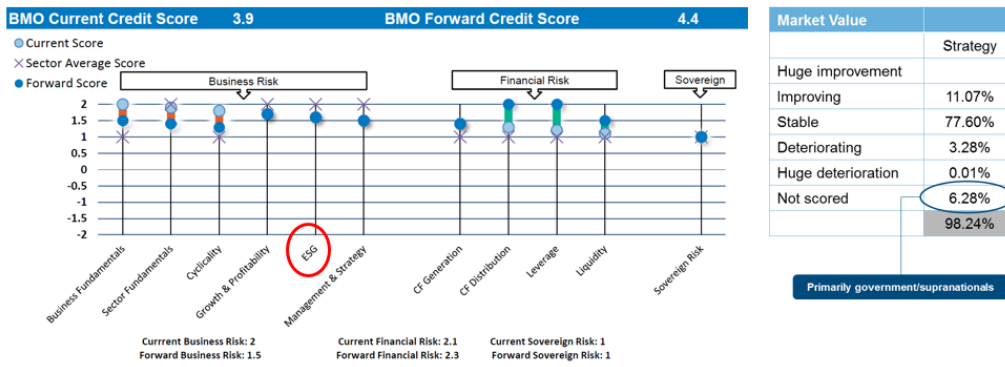
Our approach to ESG integration draws on both information from our third party ESG provider, MSCI, and the expertise of our in-house Responsible Investment team. The team identifies companies with high ESG risk both on an absolute basis and relative to peers by assigning red flags to low scores for each of these factors. The Responsible Investment team then communicates this information to the Credit team.

The ESG profile of each company we look at is assessed as part of the investment process, with a focus on those companies with one or more red flags. This may result in the analyst adjusting the Credit Score and investment recommendation. For example, harmful social or environmental practices could pose a risk to a company's reputation and influence the analyst's view of management and strategy. More directly, the potential for substantial fines could impact the company's ability to service or repay its debt. In some cases, engagement may be the recommended course of action – either to obtain more information on ESG issues from the company or to express any concerns from a credit perspective.

Within the credit scoring process, the credit analyst breaks down risk drivers between financial risk, business risk and sovereign risk. We allocate ESG risk to the business risk category. The graphic below depicts the various inputs into our credit scoring model.

Excerpt from our credit scoring model showing integration of ESG research

Credit views feed directly into portfolio management system



Identify fundamental credit drivers and relative credit risk through deep dive fundamental analysis

- ✓ Top-down and bottom-up perspective, evaluating internal and external drivers using proprietary scoring system
- ✓ Views are forward looking, emphasizing credit risk over the next 12-18 months
- ✓ Analysis leverages broad resources and includes financial statement analysis, meetings with management, and industry specialists and conferences; sell-side and independent third-party research supplement internal analysis
- ✓ Recommendations are independent of rating agencies and supported by a suite of credit deliverables

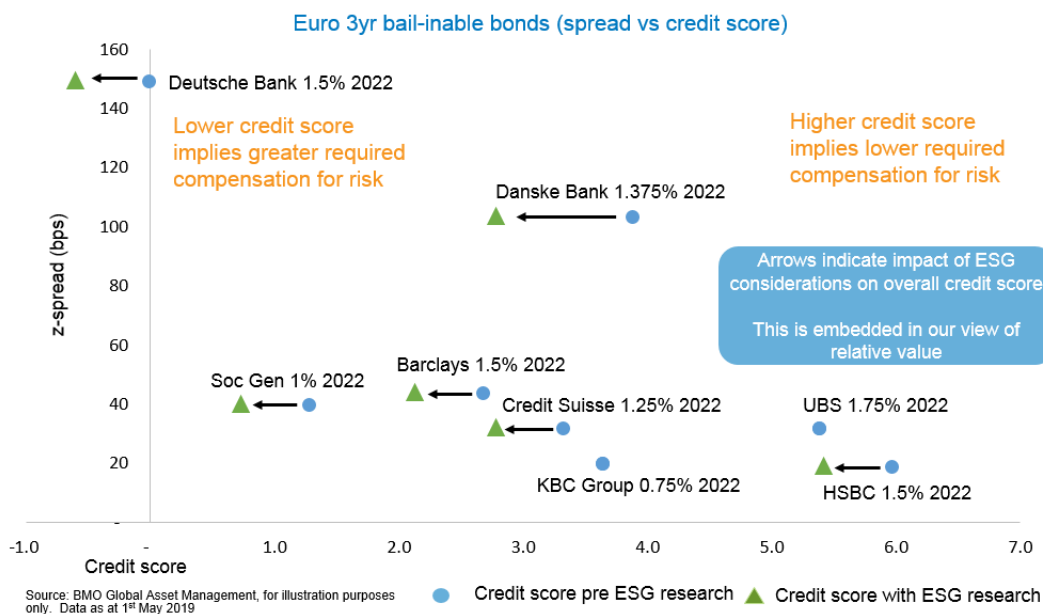
*BMO Credit Score for Corporates is weighted Business Risk Score: Financial Risk Score: Sovereign Risk Score 50:45:5. ESG = Environment, Social & Governance.

ESG research impacts the threshold spread at which we would be willing to participate in any given bond issue. In circumstances where the ESG score is positive, we would demand less compensatory spread for investing while if the ESG score were negative we would demand more compensatory spread. To denote the spread of ESG risk outcomes for credit investors, standardised scores range from +2 (highly favourable) to -2 (highly unfavourable). Within the business risk category, ESG risk is assigned an equal weighting relative to other risk factors such as business fundamentals or management & strategy.

The chart below, which is for illustrative purposes, shows the negative impact of ESG Research on the credit scores of selected financial issuers. ESG research output can either have a positive or a negative impact on the credit score.

Example of impact of ESG research on overall credit scores and relative value

Responsible investment (ESG analysis) is **embedded** within our research



Given the processes we have described, portfolio allocation to names reflects the dovetailing of positive fundamental credit research with attractive valuation metrics. Our portfolio construction process has a bias for those bonds where spreads are higher for the given credit quality taking into account the various additional risk factors such as ESG.

Fixed Income – Government bonds

- We will exclude countries that:
 - o are classified as “not free” according to the current Freedom House ranking.
 - o are not legally bound by the UN Convention on Biological Diversity.
 - o are not legally bound by the Paris Convention on Climate Change (COP-21).
 - o score below 40/100 in the current Transparency International’s Corruption Perceptions Index.
 - o are not legally bound by the Nuclear Non-Proliferation Treaty.

Alternatives

We assess alternative strategies in a similar way to other asset classes. We aim to identify opportunities to invest alongside our sustainability themes in other asset classes than traditional equities and fixed income and / or to add diversification to the portfolio. Examples of alternative assets include renewable energy infrastructure, social / health-related property and insurance linked securities. We apply the same exclusions, as shown below, and send a questionnaire if an external manager is involved to assess their process prior to investing. Post investing, we will resend a similar questionnaire to ensure both continued alignment with our Investment Policy and that we are kept informed of any changes or developments in their process with respect to ESG.

External funds / alternative strategies need to meet the following minimum criteria:

- Exclusion of weapons, tobacco and fossil fuels / power generation as in the Investment Policy
- Commitment to ESG integration
- Commitment to positive sustainable investment trends

The questions sent to the external manager prior to investment are listed below:

- 1.1 Are you signatories to the Principles for Responsible Investment (PRI)? If not, do you intend to be in the near future? If yes, are your latest transparency reports and assessment reports available?
- 1.2 Please list all responsible investment bodies/networks/initiatives you are a member of.

- 1.3 Do you have a corporate ESG policy? If yes, please attach.
- 1.4 Does your company have any sustainability related objectives? If yes, please summarise.
- 1.5 If your ESG policy does not outline your approach to engagement and voting please summarise these. Please indicate if you consider collaborative action in engagement and voting activity and if relevant provide examples of having done this.
- 1.6 If your ESG policy does not outline how you incorporate ESG considerations into your investment / asset / lease management processes, please summarise this.
- 1.7 Does this strategy have any exclusions? If yes, please give details.
- 1.8 Please confirm that none of your existing or future investments/holdings is/would be in breach with our exclusion criteria, which can be found here
- 1.9 Please give an overview of your firm's resources for integrating ESG considerations into your investment process. For example, do you have dedicated staff and committees and/or access external data providers and/or conduct ongoing training. For those with direct responsibilities relating to ESG please summarise their roles and bios.
- 1.10 Please provide an example of how you report to clients on the ESG factors impacting your portfolio, including your engagement efforts. If you don't do this, please can you outline how you may be able to help us monitor any material changes to ESG risks and/or opportunities within your strategy.
- 1.11 Do you enter your fund in any industry surveys, such as the GRESB survey for real asset strategies? If yes, please can you summarise your latest results.

The questions sent to the external manager after a period post investment are listed below:

- 1.1 Since last completing this questionnaire, have there been any changes to the responsible investment bodies/networks/initiatives you are a member of? If yes, please summarise.
- 1.2 Since last completing this questionnaire, have there been any changes to your corporate ESG policy? If yes, please summarise and attach the most recent version.
- 1.3 Since last completing this questionnaire, have there been any changes to any sustainability related objectives your company may have had? If yes, please summarise.
- 1.4 Since last completing this questionnaire, have there been any changes to your approach to ESG practices, including incorporation into investment process or voting and engagement? If yes, please summarise.
- 1.5 Since last completing this questionnaire, have there been any changes to exclusions within the strategy? If yes, please summarise.
- 1.6 Please confirm that none of your existing or future investments/holdings is/would be in breach with our exclusion criteria, which can be found here
- 1.7 Since last completing this questionnaire, have there been any changes to the resources available to the investment team relating to ESG data or staff? If yes, please summarise.
- 1.8 Please provide the most recent example of how you report to clients on the ESG factors impacting your portfolio, including your engagement efforts. If possible, please provide your most recent impact report / impact data covering metrics such as water efficiency, CO2 efficiency etc
- 1.9 Please provide a copy of the latest PRI assessment report.

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

Each quarter we review whether companies continue to meet the criteria, any involvement in recent controversies that might indicate systematic or poor ESG practices; and any merger and acquisition activity that might change our ratings. Furthermore, companies held are monitored quarterly for new or ongoing UN Global Compact breaches. Breaches are assessed on a case-by-case basis, and any security found to be in breach will be engaged as appropriate. Adjustments to the approval status of a security will be made as necessary.

4. Investment process

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

The team actively manages asset class exposures on a strategic and tactical basis. The portfolio is diversified at all times across asset classes, timeframes, geographies and investment styles. The typical asset allocation for the fund will be between 30% and 70% invested in fixed income, between 20% and 50% investment in global equities and a 10% to 30% allocation to alternatives, such as sustainable infrastructure and property, which have links to sustainability or add diversification without breaching any of the fund exclusions.

Within underlying asset classes our investment specialists seek to identify the best opportunities. When picking securities, they implement clear screening criteria around defined product and conduct-based criteria (summarised in question 3.3). As well as avoiding damaging or unsustainable practices they also aim to emphasise those that make a more positive contribution. The portfolio targets predominantly direct holdings to allow high level of engagement.

Within our Global Equities allocation, for example, the output of the fundamental analysis forms the basis of portfolio construction. The Global Equities 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.

The Responsible Investment team and the Global Equities team work together to fully incorporate ESG risks and opportunities into the fundamental valuation of each company. This might come through flexing revenue and profitability assumptions across different “bull/bear” scenario outcomes, or it will be incorporated through our proprietary “alternate weighted average cost of capital” (ALT-WACC) used as a discount rate within our DCF analysis. Within the ALT-WACC, we assess various factors, both operational and ESG, and this provides an aggregate assessment of quality, where higher quality companies warrant a lower discount rate applied to the DCF which ceteris paribus drives a higher intrinsic valuation. Similarly, within relative valuation work, ESG leaders and improves will deserve a premium valuation relative to peers, which again will be reflected in the generated valuation assessment.

Within our credit evaluation process, we assess both the ability and the willingness of an issuer to service and repay its debt, identifying securities where the spread or yield available is not justified based on the issuer’s underlying creditworthiness. In addition to assessing issuer credit risk, capital structure analysis and the shape of an issuer’s spread curve are considered to assess where credit risk is not correctly priced at the security level. The selection process is anchored in comprehensive fundamental analysis and optimized through team integration and quantitative tools. The output of the research process is: 1) the ranking of issuers and issues in terms of relative credit risk, both at the analyst and the team level and 2) the identification of opportunities created where the price of risk is not aligned with risk assessment. Fundamental analysis is the foundation of active coverage and is done from both a top-down and bottom-up perspective, assessing credit risk currently and on a forward-looking 12-18-month basis.

The main drivers of the credit evaluation process fall within the broad headings of “Business Risk” and “Financial Risk”. ESG analysis falls into the former category and can provide insight into inadequate management / business practices or how social and environmental controversies can lead to a deterioration in a company’s credit profile

We consider that higher quality companies will justify a larger active position in the portfolio.

We also utilise risk tools to monitor aggregate exposures and risk at the portfolio level including total risk, beta, active risk and sources of active risk. This prevents unintended and/or overly concentrated exposures. We also monitor portfolio risk and characteristics through time to protect against style drift.

4.2. How are criteria specific to climate change integrated into portfolio construction?¹⁵

We will assess the climate change-related risk and opportunity exposures of each company that we research on a case-by-case basis. This will involve assessing the level to which a company might be exposed to carbon emissions and the potential long-term costs of those carbon emissions relating to regulatory outlook and carbon pricing. Equally, we will also look at how that company might be positively positioned to evolutions in energy production.

We have a comprehensive climate change policy for the fund, which includes exclusion of companies with fossil fuel reserves as detailed in question 3.3, but more importantly, includes positive investment in companies providing solutions to tackling climate change, and finally, engagement to improve conduct and impact on environment as and where is relevant.

Regular carbon intensity screening is also performed to allow for portfolio construction alignments.

4.3. How are the issuers that are present in the portfolio, but not subject to ESG analysis evaluated (not including mutual funds)?¹⁶

Please specify how much the funds can hold.

Not applicable. All stocks, including alternatives, considered for inclusion in the portfolio are subject to ESG analysis and evaluation.

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

No change.

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

Yes. The BMO Sustainable Multi-Asset Income Fund gives investors with an environmental, social and governance (ESG) mindset a single product that they can invest in for capital and income returns.

Like all other Responsible and Sustainable strategies run by BMO Global Asset Management, the RI team will map the Fund holdings to the UN Sustainable Development Goals where possible, providing transparency to the investor on how the fund is positively aligned. The underlying investment philosophy is to deliver a solution to enhance long-term performance and encourage a positive contribution to broader social and environmental issues.

The world faces material and ever-growing challenges largely stemming from living on a planet with growing populations and depleting natural resources. Consequentially, the world faces problems including poverty, inequality and climate change. With such challenges come solutions, and if we can identify and invest in quality

¹⁵Reference to Article 173 of the French TECV Act and HLEG recommendations on DISCLOSURE

¹⁶Reference to Article 173 of the French TECV Act and the TCFD recommendations (delivering on investor and stakeholder demands for climate-related information)

businesses embracing and addressing these challenges then we believe there lies an opportunity for robust long-term risk/reward payoff.

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:

- 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. The counterparties' credit scores (as assigned by our Credit Analysts) are also considered.

Additionally, our Responsible Investment team engages with key counterparties on a regular basis. 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 mechanisms.



4.7. Does(do) 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).*

Yes. Derivatives are permitted within the fund in order to assist with efficient management of overall asset class positions, however positive net exposure to indices is only permitted through ESG based index derivatives or ETFs that comply fully with the fund exclusions described above. We will not use derivatives to indirectly own companies that we could not hold directly without breaching fund exclusions.

4.8. Does (do) 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 of the fund(s)? How many funds can be held?

Yes, the fund can hold external funds up to 10%. External funds / alternative strategies need to meet the following minimum criteria:

- Exclusion of weapons, tobacco and fossil fuels / power generation as defined above
- Commitment to ESG integration
- Commitment to positive sustainable investment trends

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?¹⁷

Each quarter we review whether companies continue to meet the criteria, any involvement in recent controversies that might indicate systematic or poor ESG practices; and any merger and acquisition activity that might change our ratings. Furthermore, companies held are monitored quarterly for new or ongoing UN Global Compact breaches. Breaches are assessed on a case-by-case basis, and any security found to be in breach will be engaged as appropriate. Adjustments to the approval status of a security will be made as necessary.

6. Impact measures and ESG reporting

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

- The Responsible Investment team maintains a list of the companies which are acceptable for the fund (i.e. meet the screening criteria) and those which are not.
- We can use a proprietary system to generate an ESG portfolio analytics report. This report contains information about:

¹⁷Reference to Article 173 of the French TECV Act

- The companies with the highest and lowest ESG scores in the universe
- The largest upward and downward momentum shifts over the previous quarter, including new controversies
- We map the activities of the companies we invest into the underlying targets of the Sustainable Development Goals (SDGs), using an in-house methodology. Considerations such as revenue and strategy determine whether or not we link specific business segments to SDG targets.

6.2. What ESG indicators are used by the fund(s)?¹⁸

Portfolio impact metrics: carbon intensity; water intensity; waste intensity; gender diversity; executive pay; economic development; employment; alignment with the SDGs.

Underlying company ESG Scores (a bespoke analysis method based on third party ESG data) provide industry-specific and relevant environmental, social and governance ratings, that are considered material. See 3.5. regarding their integration into the stock valuation process. In addition, exclusionary screens are applied, such as controversial weapons, tobacco, and fossil fuels.

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/>):

Annual Responsible Investment Review: This is an annual report (<https://www.bmogam.com/gb-en/intermediary/wp-content/uploads/2021/04/bmo-gam-responsible-investment-review-%E2%80%93-full-report.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.

ESG Profile and Impact Report: We see a key current trend as identifying and reporting on impact. We published our first ESG Profile and Impact report for this Fund in 2021 (<https://www.bmogam.com/wp-content/uploads/2021/06/bmo-sustainable-multi-asset-income-fund-impact-report.pdf>). It will provide investors with more information on the ESG performance of this strategy, highlighting leaders and laggards, as well as the impact its holdings are having on the world.

Webinars: ESG issues, including engagement insights, are discussed during regular webinars, which are available via our website (<https://www.bmogam.com/gb-en/intermediary/webinars/>).

6.4. Does the fund management company publish the results of its voting and engagement policies?¹⁹

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 17

¹⁸Reference to Article 173 of the French TECV Act

¹⁹ Reference to Article 173 of the French TECV Act and the HLEG recommendations on GOVERNANCE

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:

<http://vds-staging.issproxy.com/SearchPage.php?CustomerID=3660&StagingPassword=TRiTenpXpo>

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.

PRIVATE AND CONFIDENTIAL

All information provided by BMO Global Asset Management within this document is provided for the attention of the addressee only for the purpose solely of evaluating the investment management services that are available from BMO Global Asset Management. The information is provided by BMO Global Asset Management on the basis that it remains private and confidential between BMO Global Asset Management and the addressee. Accordingly, the addressee is not permitted, in the event that a request for information is made under the Freedom of Information Act 2000, to disclose any of the information provided herein by BMO Global Asset Management, given the duty of confidentiality that exists as between BMO Global Asset Management and the addressee.

CONTRACTUAL AGREEMENT

This document is issued by BMO Global Asset Management, a trading name of BMO Asset Management Limited. In the event that you decide that you wish to receive the services detailed within this document, your contractual agreement would also be with BMO Asset Management Limited.

Past performance should not be seen as an indication of future performance. The value of investments and income derived from them can go down as well as up as a result of market or currency movements and investors may not get back the original amount invested. The information, opinions estimates or forecasts contained in this document were obtained from sources reasonably believed to be reliable and are subject to change at any time.