



### **BMO Capital Markets Corp. SEC Rule 606 Disclosure Statement**

BMO Capital Markets Corp. ("BMO CMC" or "the Firm") is providing this report pursuant to Securities and Exchange Commission ("SEC" or "Commission") Rule 606 ("the Rule"). To obtain information about the rule, you may access the following web site addresses: <http://www.sec.gov/rules/final/34-43590.htm> and <http://www.sec.gov/interp/legal/mrslb13a.htm>.

#### **Information Concerning Venues**

BMO CMC makes a market in numerous equity securities, including those listed on the NASDAQ, NYSE, NYSE ARCA and BATS exchanges. BMO CMC, in its efforts to seek best execution, routes client orders to market centers, including national securities exchanges, alternative trading systems, electronic communication networks and broker/dealers. These market centers may offer credits/rebates or charge fees based upon whether routed orders contribute liquidity to (or remove liquidity from) the market center. In some cases, the credits/rebates offered by a market center may exceed the charges assessed such that a market center may make a payment to BMO CMC in relation to orders directed to such market center (maximum 25 mills per share). BMO CMC may also receive incremental pricing benefits from market centers based upon the aggregate trading volume generated by BMO CMC (including volume not associated with client orders).

BMO CMC may internalize, and trade as principal with, non-directed customer orders in such securities in which it makes a market. Where BMO CMC internalizes non-directed customer orders in those securities in which it makes a market, the Firm stands to share in 100% profits of whatever profits it generates by trading as principal with its customer's orders.

#### **Notes regarding Conflicts of Interest relating to Market Centers Most Often Selected by the Firm**

BMO CMC, in its efforts to seek best execution, selects execution venues for customer orders that have not been specifically instructed to be routed to a specific venue. For such non-directed customer orders, BMO CMC may route such orders to Clearpool Execution Services, LLC, a subsidiary of Clearpool Group, Inc. On January 21, 2020, affiliates of the Firm entered into a definitive agreement to acquire Clearpool Group Inc. The acquisition closed on April 6, 2020. Upon closing, Clearpool Execution Services, LLC, became an affiliate of the Firm. Accordingly, the Firm may share indirectly in any profits that Clearpool Execution Services derives from the execution of the Firm's client orders.

#### **Important Disclaimers**

BMO CMC has supplied this data and prepared these reports solely for informational purposes pursuant to Rule 606 of the Securities Exchange Act of 1934. The information and data provided in the reports is not intended to and do not reflect all factors relevant to an analysis of a broker/dealer's best execution and order routing practices. In accordance with SEC Rule 606, upon written request, BMO CMC will disclose to clients the identity of the venue to which clients orders were routed for execution, whether the orders were directed or non-directed, and the time of the executions, if any, that resulted from such orders from the previous six months.

# BMO Capital Markets Corp. - Held NMS Stocks and Options Order Routing Public Report

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1st Quarter, 2020

January 2020

S&P 500 Stocks

Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non-Directed Orders	Non-Marketable Limit Orders as % of Non-Directed Orders	Other Orders as % of Non-Directed Orders
0.00	0.00	0.00	0.00	0.00

Venues

Venue - Non-directed Order Flow	Non-Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non-Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/Received for Market Orders(cents per hundred shares)	Net Payment Paid/Received for Marketable Limit Orders(USD)	Net Payment Paid/Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Non-Marketable Limit Orders(USD)	Net Payment Paid/Received for Non-Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/Received for Other Orders(cents per hundred shares)

Material Aspects:

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January 2020

Non-S&P 500 Stocks

Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non-Directed Orders	Non-Marketable Limit Orders as % of Non-Directed Orders	Other Orders as % of Non-Directed Orders
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Venues

Venue - Non-directed Order Flow	Non-Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non-Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/Received for Market Orders(cents per hundred shares)	Net Payment Paid/Received for Marketable Limit Orders(USD)	Net Payment Paid/Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Non-Marketable Limit Orders(USD)	Net Payment Paid/Received for Non-Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/Received for Other Orders(cents per hundred shares)	

Material Aspects:

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January 2020





