

Summary of Anti-Money Laundering (AML) and
Anti-Terrorist Financing (ATF) Policies at BMO Financial Group.

BMO Financial Group, through AML Corporate Policy implemented by its parent, Bank of Montreal (BMO), conforms to the requirements of the Proceeds of Crime (Money Laundering) and Terrorist Financing Act and Regulations (PCMLTFA), as well as other legislation respecting anti-money laundering and anti-terrorist financing activities. BMO Financial Group refers to Bank of Montreal and its subsidiaries.

The PCMLTFA established the Financial Transactions Reports Analysis Centre of Canada (FINTRAC) to which financial institutions and other entities provide reports on prescribed transactions, including suspicious transactions (completed as well as attempted), electronic funds transfers, terrorist property, and large cash transactions. The PCMLTFA also sets out customer identification, record retention and other requirements directed at mitigating the risk of money laundering and terrorist financing occurring through financial institutions.

BMO's AML Corporate Policy stipulates that BMO Financial Group's operations will be carried out in conformity with the applicable regulatory requirements of each jurisdiction in which it operates, including AML/ATF legislation and legislation pertaining to sanctions targeting individuals, entities and/or countries.

BMO's Chief Anti-Money Laundering Officer is responsible for the AML/ATF program of BMO Financial Group – including its content, design and implementation – as well the development and oversight of policies, controls and training.

BMO Financial Group's policies reflect the requirements of the PCMLTFA and other legislation pertaining to AML/ATF activities, as well as guidance produced and issued by FINTRAC and the Office of the Superintendent of Financial Institutions of Canada (OSFI).

BMO Financial Group trusts the foregoing satisfactorily answers your questions regarding BMO Financial Group's Anti-Money Laundering and Anti-Terrorist Financing policies.

 Feb. 24, 2020

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