

Since September 11, 2001, the financial community continues to develop new processes, procedures and regulations to improve the resiliency of the financial markets, provide clearer security for customers' assets and reaffirm confidence in the ability to mitigate and/or respond to momentous events.

All members of Self-Regulatory Organizations (SRO's) such as NASD and NYSE are required through FINRA to have a Business Continuity Plan in place and to communicate that information to their customers. BMO Capital Markets Corp. has taken appropriate steps to protect our customers' assets and to comply with all financial market rules and regulations.

BMO Capital Markets Corp. aligns with BMO Financial Group in maintaining business continuity preparedness by developing, testing, and exercising viable recovery strategies and plans. Our Business Continuity Management Program continues to evaluate the threats to our respective business and build upon our strategy to mitigate those threats. Our program incorporates industry sound practices and complies with regulatory guidance applicable to BMO Financial Corp.

BMO Capital Markets Corp.'s Business Continuity objectives include the ability to safeguard the interests and well-being of our clients, customers, and employees in the event of any type of emergency, business disruption, or other unforeseen circumstances. We have established a framework that facilitates the rapid recovery and timely resumption of critical operations following any disruption to business. Our comprehensive business continuity strategy is designed so that critical processes and contracted third party arrangements are effective and compatible.

To ensure that BMO Capital Markets Corp. can continue to function as a broker/dealer and to service our customers following a significant business disruption event, the following are in place:

1. A power generator is installed in our main processing site to mitigate risk during a power outage. This generator was used successfully during the July 2019 Midtown power outage as well as the August 2003 regional power outage. There is also a generator installed at our Harborside NJ building. These generators are tested monthly and checked regularly as part of our infrastructure maintenance
2. A fully-operable back-up facility has been established and is in place outside of New York City. This capability can be activated should a crisis event (a) cause a loss of key services that support our operations in New York City, (b) force the abandonment or evacuation of our New York City location, or (c) render our New York City location inaccessible for our use.
3. We use systems that enable us to access books and records electronically from our back-up facility.
4. We have processes in place so that we can maintain reasonable communications with our customers, vendors, counter-parties, other company locations and regulators, both domestically and internationally.
5. Annually, we participate with the SIFMA and Financial Industry Association sponsored industry-wide tests to ensure that our critical vendors, counter-parties and service providers will continue to provide services we rely upon to perform our business in addition to other pre-scheduled integrated business continuity tests.
6. We conduct automated notification tests of our event notification tool, fire drills, shelter in place drills, and building evacuation drills on an at-least annual basis. Employees are also required to annually complete the Business Continuity Awareness Course online.
7. We coordinate our BCP efforts internally with the Global Continuity and Contingency Management Office in Chicago as well as the Enterprise Business Continuity Management Team in Toronto.
8. In response to pandemic situations, we utilize alternate sites and remote working capabilities for social distancing purposes. This utilization does not impact our ability to conduct essential business activities during a crisis event. We continually update employees on pandemic bulletins and participate in industry-wide Pandemic Exercises sponsored by FEMA, SIFMA and FIA.

Should a catastrophic event cause both the main and back-up facilities of BMO Capital Markets Corp. to be inoperable or inaccessible, our Toronto based, investment banking affiliate within BMO Financial Group, would be capable of fulfilling our broker/dealer role in the administration, safekeeping and processing of BMO Capital Markets Corp.'s customers' assets.

If you have questions about our business continuity planning, you can contact our Compliance Officer:

Name: Michael Forlenza

Phone: +1 212 702 1981