

Item 1 - Cover Page

Firm Brochure (Part 2A of Form ADV)
June 23, 2017

BMO ASSET MANAGEMENT CORP.

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This brochure provides information about the qualifications and business practices of BMO Asset Management Corp. If you have any questions about the contents of this brochure, please contact us at 312-461-7699. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

BMO Asset Management Corp. is a registered investment adviser. Registration of an adviser with the SEC does not imply a certain level of skill or training.

Additional information about BMO Asset Management Corp. also is available on the SEC's website at www.adviserinfo.sec.gov.

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Item 2 - Material Changes

No material updates have been made since our annual update on March 31, 2017.

Pursuant to SEC rules, we will ensure that you receive a summary of any material changes to subsequent brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

Our brochure may be requested, at any time, without charge, by contacting BMO Asset Management Corp. at 312-461-7699.

Additional information about BMO Asset Management Corp. is also available via the SEC's website www.adviserinfo.sec.gov. The SEC's website also provides information about any persons affiliated with BMO AM who are registered, or are required to be registered, as investment adviser representatives of BMO AM.

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Item 4 - Advisory Business

Overview. BMO Asset Management Corp. (“BMO AM”)¹, is a registered investment adviser with the U.S. Securities and Exchange Commission (“SEC”). BMO AM was established in 1989 and is headquartered in Chicago, IL with additional offices in Milwaukee, WI. BMO AM is a wholly-owned subsidiary of BMO Financial Corp., which is in turn a wholly-owned subsidiary of Bank of Montreal, a publicly-held Canadian diversified financial services company.

BMO AM may conduct business under the name BMO Asset Management U.S., BMO Global Asset Management U.S. and/or BMO Global Asset Management.

BMO AM is one of the constituents of BMO Global Asset Management. BMO Global Asset Management (“BMO GAM” or “GAM”) is the brand name for various affiliated entities of BMO Financial Group, that provide trust, custody, securities lending and investment management services. Certain of the products and services offered under the brand name BMO Global Asset Management are designed specifically for various categories of investors in a number of different countries and regions. Those products and services are only offered to such investors in those countries and regions in accordance with applicable laws and regulations. BMO Financial Group is a service mark of Bank of Montreal. Additional information about BMO GAM can be found in Item 10 (Other Financial Industry Activities and Affiliations).

Advisory Services. BMO AM provides discretionary and non-discretionary investment advisory services to: (i) institutions, including pension and other employee benefit plans, trusts, endowments and foundations, investment companies (including mutual funds), private pooled vehicles, insurance companies and corporations; (ii) individuals; (iii) third-party sponsors of, and clients participating in, wrap-fee programs; and (iv) common and collective portfolios for which BMO Harris Bank, N.A. (“BMO Harris Bank”), an affiliate of BMO AM, acts as trustee.

Investment advisory services are provided on a discretionary and non-discretionary basis through separately managed accounts, wrap fee programs, mutual funds and/or private funds. Services provided by BMO AM may include account management within our strategy framework, assistance in establishing investment objectives and guidelines, determining the appropriate asset class and allocation in light of established objectives and guidelines, determining the purchases and sales of securities for client portfolios, monitoring and reviewing holdings and investment performance of portfolios, and providing information on the relative attractiveness of various asset classes, investments and issues.

The investment advice varies depending upon the stated objectives and any restrictions imposed by the client. Such advice generally consists of investment research and portfolio management with respect to equity and fixed income securities and other financial instruments. In some strategies, the investment advice may be based on quantitative analysis, which includes the use of proprietary factor models developed by BMO AM, in the selection of investments for

¹ Formerly Harris Investment Management, Inc. (“HIM”) HIM changed its name to BMO Asset Management Corp. following its merger with M&I Investment Management Corp. (“M&I IMC”) on June 1, 2012. BMO acquired M&I IMC as part of its acquisition of Marshall & Ilsley Corporation (“M&I”) in July 2011. M&I IMC was founded in 1973.

accounts. Clients may impose reasonable restrictions on the management of their accounts, including on investing in certain securities or types of securities.

BMO AM also provides research and non-discretionary investment support to affiliates, including, but not limited to, BMO Harris Bank and BMO Harris Financial Advisors, Inc. (“BHFA”) for the benefit of their respective clients. These services are described in more detail below.

Services to Certain Affiliates. BMO AM provides discretionary and non-discretionary investment advisory and related services to certain affiliates, including BMO Harris Bank and BHFA. Specifically, BMO AM provides discretionary investment advisory services to (i) common and collective portfolios for which BMO Harris Bank acts as trustee; and (ii) to individual or institutional clients of certain affiliates, such as BMO Harris Bank, in the capacity of sub-adviser.

BMO AM also provides research and non-discretionary investment support to certain affiliates, such as BMO Harris Bank and BHFA, for the benefit of their respective clients. The non-discretionary services provided to these affiliates may include the development of asset allocation models and strategies and recommended lists for equity securities, fixed income securities, mutual funds, ETFs, alternative investments and non-affiliated third-party managers. Several of these services are provided by the following BMO AM division:

Multi-Asset Solutions Team. BMO AM’s Multi-Asset Solutions Team (“MAST”) is an investment team that, in addition to portfolio management of client accounts, provides certain BMO affiliates with strategic and tactical asset allocations and research of managers and funds. The asset allocations provided to BMO affiliates are not required to be implemented in the client portfolios of those BMO affiliates. In practice, these recommendations are typically followed. Similarly, the due diligence of managers and funds provided by MAST do not constitute recommendations for investment, although most of the managers and funds for which MAST conducts due diligence are included in MAST’s portfolios.

Alternative Investments Strategies Services. BMO AM has an internal team, Alternative Investments Strategies (“AIS”), devoted to the alternative investments market. AIS’s goal is to serve as a resource to investment professionals within BMO Harris Bank in order to introduce alternative investments as an asset allocation option for high-net-worth and institutional clients.

Investment Companies. BMO AM serves as investment adviser to BMO Funds, Inc. (the “BMO Funds”), a registered open-end investment management company with 44 separate mutual funds (as of December 31, 2016). The BMO Funds are distributed by BMO Investment Distributors, LLC, an affiliated broker-dealer. BMO AM also serves as investment adviser to the BMO LGM Frontier Markets Equity Fund, a non-diversified, closed-end management investment company organized as a Delaware Statutory Trust. BMO AM may also serve as a sub-adviser to certain unaffiliated mutual funds. Please refer to the applicable prospectus and statement of additional information for further information about mutual fund investments.

Wrap Programs. BMO AM may participate in wrap-fee account programs sponsored by broker-dealers and other financial institutions. Generally, under a wrap-fee program, a client of the sponsoring brokerage firm or financial institution will be able to obtain professional investment management and transaction execution for a single fee, based on the amount of assets under management. Each wrap-fee program sponsor sets its own fees for clients participating in the program and will pay BMO AM for its advisory services rendered to the client out of the fees it charges to its clients. The fee that BMO AM receives generally will be negotiated with the program sponsor and may be affected by the size of the accounts being managed and the nature of the investment objectives being utilized by BMO AM in connection with the program. BMO AM's investment advisory services to clients of a wrap-fee program may be based on specific investment styles, objectives or strategies (such as a strategy focusing on stocks issued by small capitalization companies selected for potential capital appreciation), which may differ from one program to another. The same broad range of investment objectives may not be available to wrap-fee program participants that are available to BMO AM's advisory clients outside of a wrap-fee program.

Assets under Management. As of December 31, 2016, BMO AM had \$39.7 billion under management, including \$34.5 billion in assets on a discretionary basis and \$5.3 billion on a non-discretionary basis.

Item 5 - Fees and Compensation

The specific manner in which fees are charged by BMO AM is established in a client's written agreement. Among the factors affecting the level of fees are the size of the account, the composition of the assets, other relationships the client may have with BMO AM and its affiliates, and the complexity of the restrictions and objectives of the client. From time to time, clients may pay for services by means of a combination of performance and asset-based fees as permitted by applicable federal and state regulations as described in Item 6 (Performance-Based Fees and Side-By-Side Management). Clients may be subject to minimum fees ranging typically from \$3,000 to \$75,000, depending upon the investment approach and/or strategy and services provided. BMO AM reserves the right to establish a minimum fee, charge fees below the stated minimum or to otherwise adjust fees, based on client- or account-specific considerations, following discussions with a client or prospective client. Participants in wrap or other programs through which BMO AM provides impersonal advisory services are not subject to BMO AM's minimum fees. All fees are subject to negotiation.

BMO AM will generally bill its fees on a monthly or quarterly basis in arrears. Clients may also elect to be billed directly for fees or to authorize BMO AM to directly debit fees from client accounts. For accounts in which BMO Harris Bank serves as custodian, fees are generally deducted from client assets unless the client requests to be billed separately. Management fees may be prorated for each capital contribution and withdrawal made during the applicable calendar quarter (with the exception of de minimis contributions and withdrawals). Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. In general, contracts are terminable upon 30 to 60 days' prior written notice by either party.

In addition to BMO AM's fees for its services, mutual funds in which a client's assets are invested also pay their own advisory fees and other expenses, as described in each fund's prospectus. These fees will generally include a management fee and may include a distribution fee. Depending on the fund, a client may be able to purchase these investments directly without the services of BMO AM. In that case, a client would not receive the services provided by BMO AM which are designed, among other things, to assist the client in determining which mutual funds are appropriate for a client. BMO AM may use or recommend an affiliated mutual fund. In such situations, BMO AM may retain the fee from the affiliate mutual fund. However, BMO AM will not charge a fee if it is deemed to be result in payment for duplicative services. If the investment in an affiliated mutual fund is deemed to result in a duplicative service, BMO AM, under certain circumstances and at BMO AM's discretion, will either rebate the amount of advisory fees earned by BMO AM as the manager of the affiliated mutual fund or exclude client assets invested in the affiliated mutual fund from BMO AM's account-level management fee.

BMO AM's management fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses that are incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as fees charged by custodial fees, wire transfer fees, and other fees on securities transactions.

Separate Accounts Fee Schedule. BMO AM charges an annual fee based on the type of securities held and the market value of assets under management. BMO AM reserves the right to modify the fee schedule set forth below depending on the size and nature of the client, the services provided and/or other factors. BMO AM also reserves the right to exempt assets from this fee schedule, to provide discounts to this fee schedule and to aggregate accounts for the purposes of applying the fee schedule. Typically, all assets, including dividend accruals, are included in the market value fee.

Equity Strategies	
BMO Disciplined Large-Cap Value	
BMO Disciplined Large Cap Equity	
BMO Disciplined Large-Cap Growth	
BMO Disciplined Dividend Income	
BMO Disciplined Large-Cap Select Equity	
Initial \$25,000,000	0.60%
Next \$75,000,000	0.50%
Next \$100,000,000	0.40%
Thereafter	0.35%
BMO Disciplined U.S. Low Volatility Equity	
BMO Disciplined Tax-Efficient Portfolio	
Initial \$25,000,000	0.45%
Next \$75,000,000	0.35%
Next \$100,000,000	0.25%

Thereafter	0.20%
BMO Disciplined Small/ Mid-Cap Core	
Initial \$25,000,000	0.80%
Next \$75,000,000	0.70%
Next \$100,000,000	0.60%
Thereafter	0.55%
BMO Disciplined Micro-Cap Strategy	
Initial \$25,000,000	1.00%
Next \$75,000,000	0.90%
Next \$100,000,000	0.80%
Thereafter	0.75%
BMO Disciplined Global Low Volatility	
Initial \$25,000,000	0.55%
Next \$75,000,000	0.45%
Next \$100,000,000	0.35%
Thereafter	0.30%
BMO Disciplined International Equity	
BMO Global Long/Short Equity	
BMO Disciplined Mid-Cap Value	
BMO Disciplined Mid-Cap Growth	
Initial \$25,000,000	0.70%
Next \$75,000,000	0.60%
Next \$100,000,000	0.50%
Thereafter	0.45%
BMO Disciplined Small-Cap Growth	
BMO Disciplined Small-Cap Core	
BMO Disciplined Small-Cap Value	
Initial \$25,000,000	0.85%
Next \$75,000,000	0.75%
Next \$100,000,000	0.65%
Thereafter	0.60%
BMO Socially Responsible Investing (SRI)	
Initial \$50,000,000	0.25%
Next \$50,000,000	0.20%
Thereafter	0.15%
Fixed Income Strategies	

BMO Intermediate 1-10 Year Municipal	
BMO Intermediate 1-15 Year Municipal	
Initial \$10,000,000	0.35%
Next \$15,000,000	0.30%
Next \$25,000,000	0.25%
Thereafter	0.20%
BMO Long Tax-Free Strategy	
BMO Short Tax-Free Strategy	
Initial \$10,000,000	0.30%
Next \$15,000,000	0.25%
Next \$25,000,000	0.20%
Thereafter	0.15%
BMO Ultra Short Tax-Free Strategy	
Initial \$10,000,000	0.20%
Next \$15,000,000	0.19%
Next \$25,000,000	0.18%
Thereafter	0.17%
BMO Short Term Bond	
BMO Liquid Cash	
BMO Medium Term Cash	
BMO Short Term Cash	
Initial \$100,000,000	0.14%
Next \$200,000,000	0.13%
Next \$300,000,000	0.12%
Thereafter	0.11%
Collateralized Loan Strategies	
BMO Collateralized Loan Strategy	2.00%
Multi-Asset Strategies	
BMO Diversified Income Strategy	
Initial \$25,000,000	0.55%
Next \$25,000,000	0.50%
Next \$50,000,000	0.45%
Thereafter	0.40%

Please note that not all Strategies maintained by BMO AM are listed above. Legacy clients may be invested in strategies no longer marketed or offered. For fee schedules for any Strategy not listed please contact your Relationship Management professional.

Affiliates Fee Schedule. BMO AM and certain affiliates have agreed to fee and revenue sharing arrangements for services rendered by BMO AM. In these situations, BMO AM is compensated by the affiliate. In certain cases, a client may be charged for asset management services provided by such affiliate and the investment advisory services provided by BMO AM. In that case, the affiliate may, at its discretion, waive or rebate in its client accounts all or a portion of the investment advisory fees charged by BMO AM, including those paid to the BMO Funds. These clients should contact their BMO relationship manager for more information on the fees, including those for BMO AM, charged to their accounts.

Investment Company Fees. BMO AM's fees for its advisory services to the BMO Funds are based on the net asset values of each portfolio, computed daily and payable monthly. These fees range from .15% annually to 1.00% annually. BMO AM may, from time to time, voluntarily waive all or a portion of its advisory fees received from the BMO Funds.

Private Investment Pools. Fees for advisory and other services, including those received by BMO AM and its affiliates, are described in the offering documents of those pools/funds. Please refer to the offering documents for a complete description of the fees associated with such pool/fund.

Wrap Program Fees. The fees BMO AM charges for services under wrap fee programs vary depending on the level of assets and involvement of the wrap program sponsor in providing services to the client. The fees received under the wrap fee programs may vary based upon a number of factors and range from 0.05% to 1.00% of assets under management. Fees charged by BMO Harris Bank for the various components of the MMAS Program are set forth in the MMAS disclosure statement, which also discloses fees charged by the participating managers and by the wrap fee sponsor. In addition to MMAS, BMO AM also participates in a wrap program sponsored by BMO Harris Financial Advisors, Inc., KeyBank National Association (KeyBank Managed Account Services), BMO Nesbitt Burns Inc. (Blueprint Program/Architect), Envestnet (Envestnet – Third Party Models Program) and Placemark (Placemark).

Other Fees. BMO AM and its supervised persons do not accept direct compensation for the sale of securities or other investment products. Certain affiliates and their employees may receive compensation related to the sale of securities or other investment products.

Item 6 - Performance-Based Fees and Side-By-Side Management

From time to time, clients may pay for services by means of a combination of performance and asset-based fees as permitted by applicable federal and state regulations. Generally these fees are based on a share of capital gains or on capital appreciation of a client's assets. This type of fee arrangement may create an incentive for BMO AM to make investments that are riskier or more speculative than would be the case in the absence of a performance fee. In addition, performance fee arrangements may create an incentive for BMO AM to favor those accounts in the timing of trades, security selection or similar methods.

BMO AM utilizes side-by-side management in certain portfolios that utilize a long-short investment strategy, where as part of the portfolio holds long only securities and a portion of the portfolio has sold short securities. In situations such as this, the adviser may hold the same security both long and short in different portfolios and strategies that BMO AM manages.

To minimize the effects of these conflicts of interest, BMO AM has adopted and implemented policies and procedures, including trade aggregation and allocation procedures, that it believes are reasonably designed to mitigate the potential conflicts associated with managing portfolios for multiple clients and seeks to ensure that no one client is favored over time at the expense of another.

Item 7 - Types of Clients

BMO AM provides discretionary investment advisory services for, or provides non-discretionary investment advice to, institutions including pension and other employee benefit plans, trusts, endowments and foundations, investment companies (including mutual funds), insurance companies, corporations, individuals, and third-party sponsors of and clients participating in wrap-fee programs, as well as common and collective portfolios for which BMO Harris Bank, an affiliate of BMO AM, acts as trustee. In addition, BMO AM provides investment advisory services to private pooled vehicles and to affiliates for the benefit of their clients. Certain products and/or services offered by BMO AM may only be available to accredited investor(s) and will have qualified purchaser requirements. This information is available in the offering documents associated with these types of investments.

Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss

Overview. BMO AM employs a variety of security analysis methods in managing client accounts, including fundamental and quantitative (technical) analysis. BMO AM relies on sources of information, such as financial publications, internal and external research, company visits, SEC reports and information from rating services. Investment strategies include both long-term and short-term purchases and option writing.

BMO AM cannot and does not guarantee rates of return on investments for any time period to any client. All clients assume the risk that investment returns may be negative or below the rates of return of other investment advisers, market indices or investment products. You may experience a loss of value in your investments. Past performance does not guarantee future results, and there is no guarantee that a client's investment objectives will be achieved. Investing in securities involves risk of loss that clients should be prepared to bear.

Types of Investments. BMO AM provides advice regarding the following types of securities as part of its principal investment strategies:

- equity securities
- fixed income securities

- commercial paper
- municipal securities
- government securities
- alternatives
- mutual funds
- ETFs
- futures and options contracts
- loans
- private placements

Investment Strategies. BMO AM may offer additional strategies or variations of the strategies described below. Additionally, not all strategies listed may be presently marketed. For additional information on BMO AM's investment strategies, please visit www.bmogamus.com.

INVESTMENT STRATEGIES	PHILOSOPHY AND INVESTMENT PROCESS	BENCHMARK
EQUITY STRATEGIES		
BMO Disciplined Dividend Income	<p><i>Philosophy</i> - The Investment Team (the "Team") pursues competitive long-term returns through an active, risk controlled, quantitative process. The Team believes investing in large-cap, dividend paying stocks can provide enhanced returns and stability while providing a steady income stream and potential tax benefits.</p> <p><i>Investment Process</i> - The Team considers high quality U.S. companies within the S&P 500[®] Index that possess strong dividend histories and screens for the following elements:</p> <ul style="list-style-type: none"> • <u>Dividends</u>. Focus on companies with a dividend yield in excess of 1%. • <u>Quality</u>. Identify companies with strong earnings and dividend histories, high credit ratings, and attractive growth potential. • <u>Suitability</u>. Typically exclude stocks that score poorly on our quantitative assessment or have a low probability of significant share buybacks and special dividends <p>The resulting universe is approximately 250 stocks with strong income and growth potential. The Team then incorporates quantitative factor analysis to construct a portfolio intended to benefit from dividend and value-oriented investment opportunities. The factors include metrics representing attractive valuation, quality/sustainability of fundamentals and improving investor interest.</p>	S&P 500 [®] Index

INVESTMENT STRATEGIES	PHILOSOPHY AND INVESTMENT PROCESS	BENCHMARK
	The Team applies fundamental analysis as an overlay to the quantitative models to provide a more complete assessment.	
BMO Disciplined Tax Efficient Portfolio	<p><i>Philosophy</i> - The Team believes one of the greatest threats to the long-term growth of a portfolio is the impact of taxes. Through combining passive investment management with active tax management, a client's capital gains can be managed to increase after-tax returns.</p> <p><i>Investment Process</i> - The Tax Efficient Portfolio (TEP) is a patent-protected investment strategy designed to perform similarly to the S&P 500[®] Index. The Team combines a passively managed index portfolio with active tax loss harvesting. The Team utilizes their investment technology to construct a passively managed portfolio of generally 240 – 280 stocks with similar characteristics and industry weights to the S&P 500[®] Index.</p> <p>As part of the active tax management process, the Team then applies TEP's unique quantitative investment process to identify specific loss harvesting opportunities at the security and tax lot level. These positions are sold to realize the loss and can be used to offset capital gains in the TEP account, other investment portfolios, or carried forward to offset future capital gains.</p>	S&P 500 [®] Index
BMO Disciplined Large-Cap Equity BMO Disciplined Large-Cap Select BMO Disciplined Large-Cap Growth BMO Disciplined Large-Cap Value	<p><i>Philosophy</i> – The Team invests based on company fundamentals using a disciplined quantitative process. The Team's core belief is that companies that are undervalued relative to their fundamentals, and exhibit improving investor interest, outperform the market over full market cycles. The Team also believes that, over time, the market rewards fact-based investment decisions made without emotional bias. The investment process utilizes proprietary quantitative models to rank stocks to maximize expected returns within a given level of risk. Portfolios are actively managed and are built with risk characteristics similar to the appropriate benchmark.</p>	S&P 500 [®] Index S&P 500 [®] Index Russell 1000 [®] Growth Index Russell 1000 [®] Value Index

INVESTMENT STRATEGIES	PHILOSOPHY AND INVESTMENT PROCESS	BENCHMARK
<p>BMO Disciplined Mid-Cap Value</p> <p>BMO Disciplined Small / Mid-Cap Core</p> <p>BMO Disciplined Small-Cap Growth</p> <p>BMO Disciplined Small-Cap Core</p> <p>BMO Disciplined Small-Cap Value</p> <p>BMO Disciplined Micro-Cap</p>	<p><i>Investment Process</i> – The analytical process begins with a review of all stocks within the capitalization range of the respective universe, screened to eliminate stocks that are considered illiquid or that the Team believes represent unacceptable financial risk. The resulting universe is evaluated by our proprietary multi-factor investment model, which is based on both internal research and extensive academic studies.</p> <p>The goal of the strategy is to exploit inefficiencies across the marketplace by assessing securities on three groups of metrics, representing attractive evaluation, quality/sustainability of fundamentals, and improving investor interest. The model assigns a composite score to each stock and ranks them in order of attractiveness. From this ranking, an optimal portfolio is constructed using highly ranked stocks and benchmark-aware risk controls. The resultant portfolio maximizes expected returns while controlling for a variety of risks.</p> <p>While quantitative analytics drive the process, the Team also uses a qualitative portfolio review to validate trades and check for situations not captured by the model. Any stocks eliminated during the qualitative review are replaced using an iterative optimization process. Once implemented, the Team continually reviews the portfolio to ensure it continues to hold attractive stocks, with systematic replacement of those stocks that have become unattractive. The resulting portfolio is a combination of highly ranked stocks within client constraints and designated risk parameters.</p>	<p>Russell Midcap[®] Value Index</p> <p>Russell 2500[®] Index</p> <p>Russell 2000[®] Growth Index</p> <p>Russell 2000[®] Index</p> <p>Russell 2000[®] Value Index</p> <p>Russell Microcap[®] Index</p>
<p>BMO Disciplined US Low Volatility Equity</p>	<p><i>Philosophy</i> - The product is designed to provide investors with long-term returns similar to U.S. large cap stocks with less volatility. This is achieved by owning a fully invested, actively managed portfolio of low-risk, domestic large-cap stocks. Extensive research suggests that investors exhibit a variety of behavioral biases that result in high volatility stocks being overpriced relative to low volatility stocks. The strategy takes advantage of this behavioral anomaly,</p>	<p>Russell 1000[®] Index</p>

INVESTMENT STRATEGIES	PHILOSOPHY AND INVESTMENT PROCESS	BENCHMARK
	<p>combining it with the Team's long-standing philosophy of favoring stocks with undervalued fundamentals and strong investor interest. The result is a portfolio intended to deliver performance comparable to the benchmark but at much lower risk over full market cycles.</p> <p>Portfolios are actively managed and constructed to provide low absolute risk without regard to benchmark characteristics. This will lead to higher expected tracking error relative to our traditional active equity strategies. Due to the focus on absolute risk, rather than active risk, the performance of this strategy is best measured by its Sharpe ratio rather than its information ratio.</p> <p><i>Investment Process</i> – The investment process begins with a universe of large capitalization U.S. stocks, defined as the Russell 1000[®] Index. The Team then evaluates this universe of stocks with both its multi-factor risk model and its multi-factor alpha model, which are based on internal research, external research, and extensive academic studies.</p> <p>The primary goal of the strategy is to exploit the inefficient pricing of risk in the marketplace by owning low volatility equities. Additionally, using our proprietary alpha model, the Team seeks to exploit inefficiencies related to attractive valuation, quality, and sustainability of fundamentals, as well as investor interest. Finally, the Team will also favor stocks that reduce total portfolio risk due to their attractive diversification properties. The portfolio is constructed by efficiently combining in an optimized portfolio three types of investments: low-risk stocks, stocks with attractive diversification properties, and stocks with attractive alpha scores. The result is a low-risk portfolio with moderate exposure to our alpha model. Additional risk controls are incorporated to ensure no individual security contributes a significant portion of portfolio risk and that no single economic sector dominates the portfolio.</p>	

INVESTMENT STRATEGIES	PHILOSOPHY AND INVESTMENT PROCESS	BENCHMARK
	<p>While quantitative analytics drive most of the process, the Team also incorporates a qualitative portfolio review to validate trades and verify investment suitability. Any stocks eliminated during this review are replaced using an iterative optimization process. Once implemented, the portfolio is continually monitored to ensure it maintains the desired low volatility and attractive alpha positioning.</p>	
<p>BMO Disciplined Global Low Volatility Equity</p>	<p><i>Philosophy</i> - The product is designed to provide investors with long-term returns similar to the global equity market with less volatility. This is achieved by owning a fully invested, actively managed portfolio of low-risk, global all-cap stocks. Extensive research suggests that investors exhibit a variety of behavioral biases that result in high volatility stocks being overpriced relative to low volatility stocks. The strategy takes advantage of this behavioral anomaly, combining it with our long-standing philosophy of favoring stocks with undervalued fundamentals and strong investor interest. The result is a portfolio intended to deliver performance comparable to the benchmark but at much lower risk over full market cycles. Portfolios are actively managed and constructed to provide low absolute risk without regard to benchmark characteristics. This will lead to higher expected tracking error relative to our firm's traditional active equity strategies. Due to the focus on absolute risk, rather than active risk, the performance of this strategy is best measured by its Sharpe ratio rather than its information ratio.</p> <p><i>Investment Process</i> - The investment process begins with a universe of all-capitalization global equities similar in nature to those in the MSCI All Country World (ACWI) Index. We then evaluate this universe of stocks with both our multi-factor risk model and our multi-factor alpha model, which are based on internal research, external research, and extensive academic studies. The primary goal of the strategy is to exploit the inefficient pricing of risk in the marketplace by owning low volatility equities. Additionally, using our proprietary alpha model, we</p>	<p>MSCI ACWI Index</p>

INVESTMENT STRATEGIES	PHILOSOPHY AND INVESTMENT PROCESS	BENCHMARK
	<p>seek to exploit inefficiencies related to attractive valuation, quality and sustainability of fundamentals, as well as investor interest. Finally, we will also favor stocks that reduce total portfolio risk due to their attractive diversification properties. The portfolio is constructed by efficiently combining in an optimized portfolio three types of investments: low-risk stocks, stocks with attractive diversification properties and stocks with attractive alpha scores. The result is a low-risk portfolio with moderate exposure to our alpha model. Additional risk controls are incorporated to ensure no individual security contributes a significant portion of portfolio risk and that no single economic sector, country or geographic regions dominate the portfolio. While quantitative analytics drive most of the process, we also incorporate a qualitative portfolio review to validate trades and verify investment suitability. Any stocks eliminated during this review are replaced using an iterative optimization process. Once implemented, the portfolio is continually monitored to ensure it maintains the desired low volatility and attractive alpha positioning.</p>	
BMO Global Long/Short Equity	<p><i>Philosophy</i> - The Disciplined Equity Team believes that company fundamentals drive stock prices over the long term; in the short term, however, prices often become dislocated from fundamentals due to investors' behavioral biases and emotions such as fear and greed. The team believes that fundamentally strong, attractively valued companies with growing investor interest will outperform over the long run. The team identifies these companies and builds portfolios using a systematic, data-driven process that avoids behavioral biases and grounds all investment decisions in hard data and time-tested investment principles. This approach seeks to deliver consistency and repeatability to our clients.</p> <p><i>Investment Process</i> - The strategy's investable universe encompasses all stocks in the countries included in the MSCI All Country World (ACWI) Index. The team uses a proprietary model to give a score to each company in the investable universe that</p>	MSCI ACWI Index Net

INVESTMENT STRATEGIES	PHILOSOPHY AND INVESTMENT PROCESS	BENCHMARK
	<p>represents how well that stock embodies the team's investment philosophy. Stocks with the highest scores have the highest expected returns, and stocks with the lowest scores have the lowest expected returns. The team next evaluates stocks using multiple risk models and a proprietary tool called Market Monitor, which uses the team's full platform of quantitative data to identify opportunities for alpha generation and risk management based on the current market environment.</p> <p>For long positions, the team focuses on companies that they believe are fundamentally strong, have attractive valuations, possess growing investor interest, and may outperform the overall equity market. For short positions, they focus on companies that they believe are fundamentally challenged, are overvalued, are experiencing deteriorating investor interest, and may underperform the overall equity market. To identify potential short opportunities, the team augments their return model to account for securities that are difficult to short due to size and availability of securities and to eliminate short positions with risk profiles the team considers unattractive.</p> <p>After forecasting stock returns, stock risk and market level opportunities and themes, the team uses an optimizer to construct a well-diversified long/short portfolio that maximizes expected returns subject to a variety of risk considerations. The common-sense limits used during portfolio construction represent another layer of risk management. Finally, the team incorporates a transaction cost model and cost to borrow into the portfolio construction process to explicitly trade off alpha generation and risk management with trading and shorting costs.</p> <p>While quantitative analytics drive most of the process, the team also incorporates a qualitative portfolio review to validate trades and verify investment suitability. Any stocks eliminated during this review are replaced using an iterative optimization process.</p>	

INVESTMENT STRATEGIES	PHILOSOPHY AND INVESTMENT PROCESS	BENCHMARK
BMO Disciplined International Equity	<p><i>Philosophy</i> - We believe that companies that are undervalued relative to their fundamentals, with improving investor interest, should outperform the market over full market cycles. Accordingly, our investment process assesses companies using a disciplined quantitative approach so that we can make fact based investment decisions without emotional bias. Our process combines a proprietary stock ranking model that evaluates every stock's potential return with a risk model to build a portfolio that maximizes expected return under a variety of risk constraints. The resulting portfolio is actively monitored and managed and will have risk characteristics similar to those of the benchmark.</p> <p><i>Investment process</i> - The analytical process begins with a review of all stocks in countries covered by the MSCI EAFE Index. The resulting universe is evaluated by four regional proprietary multi-factor stock ranking models. All factors used in our models have strong financial intuition and are based not only on extensive internal research but academic studies as well. Every model seeks to exploit market inefficiencies by assessing securities on three groups of metrics related to valuation, quality/sustainability of fundamentals and investor interest. The final output of each model is a composite score for each stock representing expected alpha or excess return. The portfolio is built by maximizing its expected return subject to a variety of risk, turnover and client constraints. While quantitative analytics drive the process, we do a hands-on review of every trade to validate it from a fundamental perspective and to check for risks not captured by the model. Any stocks that fail the qualitative review are eliminated and the process is repeated until all trades can be qualitatively validated during the hands-on review. Once implemented, the portfolio is constantly monitored to ensure it continues to hold attractive stocks. As holdings fall in model rank, we systematically sell them to make room for more attractive securities.</p>	MSCI EAFE Index
FIXED INCOME STRATEGIES		

INVESTMENT STRATEGIES	PHILOSOPHY AND INVESTMENT PROCESS	BENCHMARK
<p>BMO Intermediate 1-10 Municipal</p> <p>BMO Intermediate 1-15 Year Municipal</p> <p>BMO Long Tax Free</p>	<p><i>Philosophy</i> - The Team's goal is to generate a high level of tax-free income consistent with capital preservation. The Team believes that over extended periods, income drives total return performance. Yet, over shorter periods the municipal bond market can be very inefficient. These inefficiencies can be exploited through active management, and the benefits of active management can be inversely related to a portfolio's size.</p> <p><i>Investment Process</i> - The Team's active management process includes the following:</p> <ul style="list-style-type: none"> • <u>Security Selection.</u> Identifying undervalued securities, such as shorter maturities of smaller municipal issuers, and improving credit situations. The Team seeks securities with structures that enhance income such as callables, puts and high coupons. The Team will accept credit risk when fairly compensated for that risk, focusing on shorter maturities. • <u>Yield Curve Positioning.</u> Evaluating the current and anticipated slope of the yield curve and employing strategies to capture value among different maturities. • <u>Credit Quality Management.</u> Evaluating economic environment, debt issuance, ratings trends and underlying financial data. Riskier credits are focused on shorter maturities. • <u>Duration Management.</u> Maintaining an average portfolio duration of generally between 80% and 120% of the benchmark. • <u>Sector Allocation.</u> Evaluating relative value opportunities among municipal bond sectors. 	<p>Barclays Capital Municipal Bond Index 1-10 Year Blend</p> <p>Barclay Capital 1-15 Year Muni Blend Index</p> <p>Bloomberg Barclays Capital US Municipal Bond Index</p>
<p>BMO Short-Term Bond</p>	<p><i>Philosophy</i> - The Team's goal is to provide a high level of current income consistent with preservation of capital. The Team believes that divergences within the fixed income markets provide exploitable opportunities. By utilizing a combination of a disciplined top-down and bottom-up approach, performance can be positively impacted through evaluation of risk/return characteristics within the fixed income sectors and credit markets, moderate</p>	<p>Merrill Lynch 1-3 Year U.S. Corporate/ Government Index</p>

INVESTMENT STRATEGIES	PHILOSOPHY AND INVESTMENT PROCESS	BENCHMARK
	<p>interest rate anticipation, and ongoing economic analysis.</p> <p><i>Investment Process</i> - The Team's active management process combines a top-down and bottom-up approach that includes:</p> <ul style="list-style-type: none"> • <u>Security Selection.</u> Investments are analyzed on a relative value basis in terms of spread relationships and return potential versus other eligible securities. Absolute or static spreads and option adjusted spreads are integral in this process. The Team can gain insight from both internal and external sources regarding potential value added opportunities arising from overvalued/undervalued fixed income securities. • <u>Yield Curve Positioning.</u> Evaluating the current and anticipated shape of the yield curve and positioning the portfolio where value added opportunities exist. • <u>Duration Management.</u> Optimal duration management involves strategic steps to shorten or lengthen duration in anticipation of economic cycles. • <u>Sector Allocation.</u> The risk/return profile of each sector in the benchmark is analyzed to strategically over or underweight a sector and exploit opportunities or avoid problems. 	
FIXED INCOME CASH STRATEGIES		
<p>BMO Taxable Cash</p> <p>BMO Government Cash</p> <p>BMO Tax-Free Cash</p>	<p><i>Philosophy</i> - The Team pursues current income with a strategy that combines opportunistic sector and security selection with disciplined risk management, strict credit analysis and thorough analysis of the risk/return structure of eligible money market securities.</p> <p><i>Investment Process</i> - The investment process involves intensive portfolio management, including the identification of investment opportunities across the yield curve, sectors and security types.</p>	<p>Citigroup 3 Month T-Bill Index</p> <p>iMoneyNet Money Fund Report/ Government</p> <p>iMoneyNet Money Fund Report/Tax-Free National</p>

INVESTMENT STRATEGIES	PHILOSOPHY AND INVESTMENT PROCESS	BENCHMARK
<p>BMO Liquid Cash</p> <p>BMO Short Term Cash</p> <p>BMO Medium Term Cash</p>	<p><i>Philosophy</i> - The Team's short duration fixed income philosophy is structured with the belief that alpha is achieved by balancing a set of low-risk, time-tested strategies and by exploiting mispricings in term structure, market sectors and issue valuation.</p> <p><i>Investment Process</i> – The Team believes that the best way to consistently maximize short duration fixed income portfolio returns is to combine a systematic, quantitative approach with the investment expertise that our team of seasoned portfolio managers, sector specialists, and analysts can offer. The fixed income team utilizes a balanced approach that involves security selection, sector allocation and yield curve management.</p> <p><u>Issue Selection</u> is primarily based on interest rate outlook, economic forecasts and supply and demand imbalances. This stage of portfolio management allows the Team to identify relative value opportunities that emerge due to market inefficiencies in pricing credit, structural and technical market factors. Sector expertise and response time are critical determinants (or advantages) in the Team's ability to capitalize on these situations. Credit analysts use proprietary quantitative models that predict cash flows and potential credit changes to evaluate issuers.</p> <p><u>Sector/Quality Spreads</u> are an important source of value added in a fixed income portfolio. This strategy substitutes short government securities with alternative spread products, and is an important source of value added. The Team's in-house analysis of the strategy has historically produced excess returns versus the benchmark with very limited additional risk. The optimal reallocation among spread sectors was derived from our proprietary quantitative research of the individual sectors' risk/reward profiles.</p> <p><u>Interest Rate Risk Management</u> is another contributor to performance, as the Team seeks to maximize yield per unit of risk. The process involves identifying</p>	<p>BofA Merrill Lynch 3 - Month U.S. Treasury Bill Index</p> <p>BofA Merrill Lynch 6 - Month U.S. Treasury Bill Index</p> <p>Static benchmark which has equal weightings of the:</p> <ul style="list-style-type: none"> • BofA Merrill Lynch 3-Month U.S. Treasury Bill index (25%) • BofA Merrill Lynch 6-Month U.S. Treasury Bill index (25%) • BofA Merrill Lynch 1-Year U.S. Treasury Note index (25%) • BofA Merrill Lynch U.S. Treasury 1-3 year index (25%)

INVESTMENT STRATEGIES	PHILOSOPHY AND INVESTMENT PROCESS	BENCHMARK
	<p>yield curve themes and positioning investments optimally along the yield curve. Relative value methodology is used to identify opportunities across maturities and to take advantage of systematic mispricing of certain yield curve sectors.</p> <p><u>Liquidity Premium</u> refers to the ability to achieve higher yields by lengthening maturities in an upwardly sloping yield curve environment.</p>	
COLLATERALIZED LOAN STRATEGIES		
Collateralized Loan	<p><i>Philosophy</i> - The Team's focus is to build diversified portfolios primarily consisting of senior secured broadly syndicated and middle market loans. Such financings typically support the acquisition, recapitalization or refinance of publicly and privately held entities.</p> <p><i>Investment Process</i> - The Team believes a diversified portfolio of investments minimizes exposure to any single issuer, industry, geography or common owner (i.e. equity sponsor). Investments are assessed primarily on the sustainability of the borrower's underlying operating cash flow and fundamental credit attributes with additional consideration provided to the underlying valuation of the borrower.</p>	
ASSET ALLOCATION STRATEGIES		
<p>BMO Managed Asset Allocation Program/Portfolios (MAAP)</p> <ul style="list-style-type: none"> • Fixed Income • Diversified Income • Moderate Balanced • Growth Balanced • Aggressive Balanced • Diversified Stock • Aggressive Stock • Strategic Balanced 	<p>MAAP is designed to allow clients to diversify their investments across a model portfolio. BMO AM provides the model portfolios to its clients who are then responsible for implementing the strategy.</p> <p>The model portfolios contain a mix of mutual funds and ETFs that fit within the objectives of the specific investment strategy selected by its client. The mutual funds and ETFs include, but are not limited to, BMO Funds, a mutual fund family advised by BMO AM. The mutual funds and ETFs included in each MAAP strategy invest in fixed income, equity and/or other securities.</p>	<p>Blended Lipper Funds Averages/Morningstar Category Averages/Lipper Target Funds Averages</p>

INVESTMENT STRATEGIES	PHILOSOPHY AND INVESTMENT PROCESS	BENCHMARK
<ul style="list-style-type: none"> • Strategic Stock • Fixed Income Tax-Advantaged • Diversified Income Tax-Advantaged • Moderate Balanced Tax-Advantaged • Growth Balanced Tax-Advantaged • Aggressive Balanced Tax-Advantaged • Strategic Balanced Tax-Advantaged 	<p>The asset allocations are selected by a team of three senior investment portfolio managers. The Team will continuously monitor the models and may make modifications to either the investment approach or the underlying fund allocations that the Team believes could benefit clients. The Team will also monitor the underlying funds on an ongoing basis and may increase or decrease the program's investment in one or several underlying funds. The underlying fund selections are made based on several considerations, including the fund's investment team expertise, style or asset class exposures, portfolio characteristics, risk profile, and investment process. The Team regularly rebalances the models to align with its tactical and strategic allocations</p> <p>There are currently 15 MAAP risk based model investment strategies having investment objectives that range from fixed income to aggressive growth, including three strategies that exclude large cap stock investments.</p>	
<p>Target Risk Allocation Strategies</p> <ul style="list-style-type: none"> • Conservative Allocation • Moderate Allocation • Balanced Allocation • Growth Allocation • Aggressive Allocation 	<p>The Target Risk Strategies invest primarily in BMO mutual funds representing a variety of asset classes (the underlying funds) according to an asset allocation strategy developed by the BMO AM. BMO AM may add unaffiliated funds to the underlying funds in its discretion and periodically may rebalance or modify the asset mix and change the underlying funds.</p> <p>Each of the Target Risk Strategies is designed for investors based on their own level of investment risk tolerance. If the investor's risk tolerance changes, they can exchange into one of the other Target Risk Strategies. The asset mix changes from predominantly fixed income in the Conservative Allocation to predominantly equities in the Aggressive Allocation.</p> <p>The asset allocations are selected by a team of three senior investment portfolio managers. The team will continuously monitor the strategies and may make</p>	<p>Blended Lipper Funds Averages/Morningstar Category Averages</p>

INVESTMENT STRATEGIES	PHILOSOPHY AND INVESTMENT PROCESS	BENCHMARK
	<p>modifications to either the investment approach or the underlying fund allocations that the team believes could benefit shareholders. The team will also monitor the underlying funds on an ongoing basis and may increase or decrease the fund's investment in one or several underlying funds. The underlying fund selections are made based on several considerations, including the fund's investment team expertise, style or asset class exposures, portfolio characteristics, risk profile, and investment process. The team regularly rebalances the portfolios to align with its tactical and strategic allocations</p>	
<p>Strategic Fund Portfolio Program (the "SFP Program")</p> <ul style="list-style-type: none"> • Maximum Growth • Capital Growth • Balanced • Conservative • Growth • Income • Capital Preservation • Diversified Income Strategy 	<p><i>Philosophy</i> - Proper asset allocation requires deep insight and research into secular trends, economic developments, geopolitical changes, security valuations and market risk. The Team believes that deep analysis of monetary regimes, demographics, political developments and business conditions can generate desired results for investors. Proprietary research and asset allocation investment metrics focus on uncovering and exploiting market mispricing. Within higher volatility portions of the portfolio, risk is mitigated by utilizing the entire market cap spectrum of the U.S equity market in addition to overseas markets. Furthermore, alternatives such as commodities and real estate investment trusts are utilized for similar purposes. Within the more conservative sections of the portfolio, interest rate and inflation risks inherent in investment grade fixed income are hedged by selecting asset classes that we believe are better positioned to withstand such lurking hazards.</p> <p><i>Investment Process</i> - The Team creates a baseline strategic allocation mix based on its assessment of investment conditions over the course of the next generation. The group then analyzes hundreds of metrics it has developed over entire careers to gauge the relative attractiveness of the disparate asset classes in the next 12 to 18 months. Each month the Team reviews its library of charts and models, with all strategists personally addressing every asset class to assure that no single opinion</p>	<p>The Long-Term Benchmark is built using long-term asset classes and allocation weights developed by BMO AM and Active Benchmark is built using the active asset classes and allocation weights developed by BMO AM. The following indices are used to represent each asset class in constructing the Long-Term and Active weighted Benchmarks:</p> <p>Large-Cap Stocks - S&P 500; Small Cap Stocks - Russell 2000; International - MSCI EAFE (net dividends); Emerging Markets - MSCI Emerging Markets Free (net</p>

INVESTMENT STRATEGIES	PHILOSOPHY AND INVESTMENT PROCESS	BENCHMARK
	<p>dominates. When investment changes are proposed by one of the managers, another team member plays the role of “devil’s advocate,” assuring that all perspectives have been placed on the table before confirming that portfolio maneuvers are prudent and justifiable.</p> <p>The portfolio is well diversified by asset class, generally holding 15-30 exchange traded funds that cover fixed income, equities, commodities, real estate investment trusts and hybrids of those asset classes. Securities are liquidated when an asset class’s investment metrics deteriorate. Decisions are driven by a combination of fundamental valuations, economics, momentum, sentiment and liquidity factors.</p>	<p>dividends); Taxable Bonds - Barclays Capital Intermediate Gov/Credit; Tax-exempt Bonds - Barclays Capital Municipal 5 year, Commodities - Dow Jones-UBS Commodity; REITs – FTSE NAREIT Equity REITs; Taxable Cash - Lipper Money Market Funds; Tax-Exempt Cash - Lipper Tax-Exempt Money Market Funds; Bank Loans – Credit Suisse Leveraged Loan; Opportunistic High Volatility – split evenly between the Gateway Fund (GTEYX) and the Pyxis Long Short Equity Fund (HEOZX). Historical returns from time to time have included the MFR Taxable 1st Tier Institutional and MFR Tax-free Institutional indices.</p>

Multi-Asset Solutions Team. MAST maintains updated information on proprietary mutual funds, unaffiliated funds, ETFs and third party investment managers through routine due diligence efforts. BMO proprietary products undergo the same due diligence as the unaffiliated products. MAST may initiate due diligence for products and managers by request. MAST due diligence research is not meant to serve as an investment recommendation.

Alternative Investment Services. BMO AM performs thorough due diligence and on-going, unbiased analysis on as many areas of the third party as possible, such as firm background, investment methodology, investment performance, and compensation/fee structures. As part of the due diligence process and for operational efficiency, Alternative Investment Services maintains on-going communications with sub-advisers.

Other. The methods of analysis that BMO AM employs for registered investment company clients are described in the applicable fund prospectus. Methods of analysis that BMO AM employs for private investment pools/funds and alternative investment clients are described in offering materials relating to the product.

Material Risks

Investing in securities involves risk of loss that clients should be prepared to bear. The list of risk factors below is not a complete enumeration or explanation of the risks involved in portfolios managed by BMO AM or the securities in those portfolios.

General Risks

Management and Strategy Risk. The ability of a portfolio to meet its investment objective is directly related to BMO AM's investment strategies for portfolios. The investment process used by BMO AM could fail to achieve client investment objective and cause investments to lose value.

Issuer Risk. An issuer may perform poorly, and therefore, the value of its securities may decline, which would negatively affect the portfolio's performance. Poor performance may be caused by poor management decisions, competitive pressures, breakthroughs in technology, reliance on suppliers, labor problems or shortages, corporate restructurings, fraudulent disclosures or other events, conditions or factors.

Portfolio Turnover Risk. The portfolio manager may actively and frequently trade securities in the portfolio to carry out its principal strategies. A high portfolio turnover rate increases transaction costs, which may increase the portfolio's expenses. Frequent and active trading may also cause adverse tax consequences for investors in the portfolio due to an increase in short-term capital gains.

Market Sector Risk. BMO AM's investment strategy may result in significantly over or under exposure to certain industries or market sectors, which may cause a portfolio's performance to be more or less sensitive to developments affecting those industries or sectors.

Non-Diversification/Concentration. In certain cases, client accounts may be concentrated in a small number of issuers. Accordingly, a client's portfolio may be subject to more rapid change in value than would be the case if BMO AM elected not to concentrate on certain issuers or maintained a wider diversification among industries, geographic areas, types of investments and issuers.

Market Volatility Risk. The value of the securities in which a strategy invests may go up or down in response to the prospects of individual companies and/or general economic conditions. Price changes may be temporary or may last for extended periods. Instability in the financial markets has led to volatile financial markets that expose a portfolio to greater market and liquidity risk and potential difficulty in valuing portfolio instruments that it holds.

Equity Securities

Generally, prices of equity securities are more volatile than those of fixed income securities. Risks associated with investing in equity securities include and are not limited to the following:

Stock Market Risks. Investments in equity securities are subject to fluctuations in the stock market, which has periods of increasing and decreasing values. Stocks are more volatile than debt securities.

Growth Style Risks. Due to their relatively high valuations, growth stocks are typically more volatile than value stocks. Further, growth stocks may not pay dividends or may pay lower dividends than value stocks. This means they depend more on price changes for returns and may be more adversely affected in a down market compared to value stocks that pay higher dividends.

Value Style Risks. Investments in value stocks are subject to the risk that their intrinsic values may never be realized by the market, that a stock judged to be undervalued may actually be appropriately priced, or that their prices may decline, even though in theory they are already undervalued. Value stocks can react differently to issuer, political, market and economic developments than the market as a whole and other types of stocks (e.g., growth stocks).

Company Size Risks. Generally, the smaller the market capitalization of a company, the fewer the number of shares traded daily, the less liquid its stock and the more volatile its price. Companies with smaller market capitalizations also tend to have unproven track records, a limited product or service base and limited access to capital. These factors increase risks and make these companies more likely to fail than companies with larger market capitalizations.

Quantitative Model Risk. Securities selected using quantitative methods may perform differently from the market as a whole for many reasons, including the factors used in building the quantitative analytical framework, the weights placed on each factor, and changing sources of market returns, among others. In some instances, a quantitative methodology may only have been tested using historical market data. There can be no assurance that these methodologies will enable the portfolio to achieve its objective.

Fixed Income Securities

Fixed income securities are subject to various risks, the most prominent of which are credit risk and interest rate risk. These risks can affect a security's price volatility to varying

degrees, depending upon the nature of the instrument. Risks associated with investing in fixed income securities include and are not limited to the following:

Credit Risks. Credit risk is the possibility that an issuer or counterparty will default on a security or repurchase agreement by failing to pay interest or principal when due. If an issuer defaults, the client's portfolio holding securities of that issuer may lose money. Lower credit ratings correspond to higher credit risk. Bonds rated BBB or Baa have speculative characteristics.

Interest Rate Risks. Prices of fixed income securities rise and fall in response to changes in the interest rate paid by similar securities. Generally, when interest rates rise, prices of fixed income securities fall. Changes in a debt instrument's value usually will not affect the amount of interest income paid, but will affect the value of the security. Interest rate changes have a greater effect on the price of fixed income securities with longer maturities. Certain securities pay interest at variable or floating rates. Variable rate securities reset at specified intervals, while floating rate securities reset whenever there is a change in a specified index rate. In most cases, these reset provisions reduce the effect of changes in market interest rates on the value of the security. However, some securities do not track the underlying index directly, but reset based on formulas that can produce an effect similar to leveraging; others may also provide for interest payments that vary inversely with market rates. The market prices of these securities may fluctuate significantly when interest rates change. An investment offering a lower yield, and therefore it might not benefit from any increase in value as a result of declining interest rates.

Call Risks. If the fixed income securities in which a portfolio managed by BMO AM invests are redeemed by the issuer before maturity (or "called"), the portfolio may have to reinvest the proceeds in securities that pay a lower interest rate, which may decrease the portfolio's overall yield. This will most likely happen when interest rates are declining.

Long-Term Maturities/Durations Risk. Fixed income securities with longer maturities or durations may be subject to greater price fluctuations due to interest rate, tax law, and general market changes than securities with shorter maturities or durations.

Liquidity Risks. Liquidity risk refers to the possibility that the client's portfolio may not be able to sell or buy a security or close out an investment contract at a favorable price or time. Consequently, the portfolio may have to accept a lower price to sell a security, sell other securities to raise cash or give up an investment opportunity, any of which could have a negative effect on the portfolio's performance. Infrequent trading of securities also may lead to an increase in their price volatility.

Asset-Backed/Mortgage-Backed Securities Risks. Asset-backed and mortgage-backed securities are subject to risks of prepayment. A portfolio's yield will be reduced if cash from prepaid securities is reinvested in securities with lower interest rates. The risk of prepayment also may decrease the value of mortgage-backed securities. Asset-backed securities may have a higher level of default and recovery risk than mortgage-backed securities. Both of these types of securities may decline in value because of mortgage foreclosures or defaults on the

underlying obligations. Credit risk is greater for mortgage-backed securities that are subordinate to another security.

Government Obligations Risks. No assurance can be given that the United States government will provide financial support to United States government-sponsored agencies or instrumentalities where it is not obligated to do so by law. As a result, there is risk that these entities will default on a financial obligation.

High Yield Securities Risks. High yield securities tend to be more sensitive to economic conditions than are higher-rated securities and generally involve more credit risk than securities in the higher-rated categories. The risk of loss due to default by an issuer of high yield securities is significantly greater than issuers of higher-rated securities because such securities are generally unsecured and are often subordinated to other creditors. A portfolio may have difficulty disposing of certain high yield securities because there may be a thin trading market for such securities.

Municipal Securities Risks. Certain types of municipal bonds are subject to risks based on many factors, including economic and regulatory developments, changes or proposed changes in the federal and state tax structure, deregulation, court rulings and other factors. The value of municipal securities may be affected more by supply and demand factors or the creditworthiness of the issuer than by market interest rates. Repayment of municipal securities depends on the ability of the issuer or project backing such securities to generate taxes or revenues. There is a risk that the interest on an otherwise tax-exempt municipal security may be subject to federal income tax.

Municipal Sector Risks. BMO AM may invest in municipal securities that finance similar projects, such as those relating to education, health care, transportation and utilities. To the extent an account is invested in a particular sector, the account's performance may be more susceptible to any economic, business or other developments that generally affect that sector.

Collateralized Loan Obligations

Interests in Non-Investment Grade Middle Market Loans. Non-investment grade middle market loans are subject to liquidity, market value, credit, interest rate, reinvestment and certain other risks. In addition, there can be no assurance that the BMO AM will correctly evaluate the nature and magnitude of the various factors that could affect the value and return of the loan obligations or purchase loan obligations that can generate sufficient returns. It is anticipated that the collateral generally will be subject to greater risks than investment grade corporate obligations. These risks could be exacerbated to the extent that the portfolio may be concentrated in one or more particular types of loan obligations.

Prices of the collateral may be volatile and will generally fluctuate due to a variety of factors that are inherently difficult to predict, including but not limited to changes in interest rates, prevailing credit spreads, general economic conditions, financial market conditions, domestic and international economic or political events, developments or trends in any particular industry, and the financial condition of the obligors of the collateral. In particular, the market

for non-investment grade middle market loans has experienced periods of severe price volatility and reduced liquidity. Additionally, loans have significant liquidity and market value risks since they are not generally traded in organized exchange markets but are traded by banks and other institutional investors in privately negotiated transactions. Because loans are privately syndicated and loan agreements are privately negotiated and customized, loans are not purchased or sold as easily as publicly traded securities. In addition, historically the trading volume in the loan market has been small relative to the high-yield debt securities market.

The obligors of the loan obligations comprising the collateral will primarily be middle market businesses, the majority of which will be privately owned. There is generally no publicly available information about these businesses. Some obligors may not meet net income, cash flow and other coverage tests typically imposed by lenders. Numerous factors may affect an obligor's ability to repay its related loan obligations, including the failure to meet its business plan, a downturn in its industry or continuing negative economic conditions. Deterioration in an obligor's financial condition and prospects may be accompanied by deterioration in the collateral securing the loan obligation. Such deterioration might impair the ability of the obligor thereof to obtain refinancing or force it to seek to have the loan obligation restructured.

A non-investment grade middle market loan is generally considered speculative in nature and may become a defaulted obligation for a variety of reasons. A defaulted obligation may become subject to either substantial workout negotiations or restructuring, which may entail, among other things, a substantial reduction in the interest rate, a substantial write-down of principal, and a substantial change in the terms, conditions and covenants with respect to such defaulted obligation. In addition, such negotiations or restructuring may be quite extensive, protracted and costly over time, and therefore may result in substantial uncertainty with respect to the ultimate recovery on such defaulted obligation. The liquidity of defaulted obligations may be limited, and to the extent that defaulted obligations are sold, it is highly unlikely that the proceeds from such sale will be equal to the amount of unpaid principal and interest thereon.

Non-investment grade loans to middle market businesses may carry more inherent risks than non-investment grade loans to larger, publicly traded entities. These companies generally have more limited access to capital and higher financing costs, may be in a weaker financial position, may need more capital to expand or compete, and may be unable to obtain financing from public capital markets or from traditional sources, such as commercial banks. Accordingly, loans made to middle market companies involve higher risks than loans made to companies that have larger businesses, greater financial resources or are otherwise able to access traditional credit sources. Middle market businesses typically have narrower product lines and smaller market shares than large businesses. Therefore, they tend to be more vulnerable to competitors' actions and market conditions, as well as general economic downturns. These businesses may also experience substantial variations in operating results. Typically, the success of a middle market business also depends on the management talents and efforts of one or two persons or a small group of persons. The death, disability or resignation of one or more of these persons could have a material adverse impact on the

obligor and its ability to repay its obligations. In addition, middle market businesses often need substantial additional capital to expand or compete and will often have borrowed money from other lenders and may need additional capital to survive any economic downturns. Accordingly, loans made to middle market companies involve higher risks than loans made to companies that have larger businesses, greater financial resources or are otherwise able to access traditional credit sources.

Middle-market and leveraged loans have historically experienced greater default rates than has been the case for investment grade and larger loans. There can be no assurance as to the levels of defaults or recoveries that may be experienced on the loan obligations, and an increase in default levels or decrease in recovery rates could adversely affect payments on the account.

Loan Obligations Illiquidity. Many of the loan obligations purchased will have no, or only a limited, trading market. An investment in illiquid loan obligations may restrict BMO AM's ability to dispose of investments in a timely fashion and for a fair price, as well as its ability to take advantage of market opportunities. Illiquid loan obligations may trade at a discount from comparable, more liquid investments. The secondary market for middle market loans is smaller and may be less liquid than the market for broadly-syndicated loans made to larger obligors. The prices realized from the sale of loan obligations could be less than those originally paid or less than what may be considered the fair value of such debt obligations.

Other

Alternative Investment Risks. Alternative investments are not suitable for all clients, and intended for qualified and sophisticated investors who are willing to bear the high economic risks of the investment. Alternative investment returns can be volatile. Investors may lose all or a substantial portion of the investment due to leveraging, short-selling or other speculative investment practices. Alternative investments can be highly illiquid in that there may be no secondary market for the investment. In addition, there may be restrictions on transferring interests. There is manager risk, as well as a potential lack of diversification and resulting higher risk due to concentration of trading authority with a single manager. Alternative investment products are often not subject to the same regulatory requirements as registered products; may have higher fees than mutual funds, which may offset trading profits; there may be an absence of information regarding valuations and pricing; and in many cases the underlying investments are not transparent and are known only to the investment manager. Alternative investments may involve complex tax structures and delays in tax reporting.

Derivatives Risks. Certain strategies may use derivatives. Derivatives, including forward currency contracts, futures, options and swaps, may be more volatile than investments directly in the underlying securities. Derivatives may expose the strategy to liquidity, leverage and credit risk, and could result in losses that exceed the original amount invested. Derivatives also expose the strategy to counterparty risk (the risk that the derivative counterparty will not fulfill its contractual obligations), including the credit risk of the derivative counterparty. Derivatives may not perform as expected, so the strategy may not realize the intended benefits. In addition, the value of a derivative may not correlate perfectly

to the underlying financial asset, index or other investment or overall securities markets; and, given their complexity, derivatives expose the strategy to the risk of mispricing or valuation risk.

Short Selling Risks. Unlike purchasing a security long, short selling (“shorting” or “short”) a security comes with its own unique risks. The loss on a short is theoretically unlimited, as a short sale loses value if a security’s price appreciates. The adviser must pay margin interest on securities sold short where the position is kept open, thus potentially limiting the upside potential of the short. Short sellers are also responsible for making any dividend payments on the shorted stock to the entity from whom the stock has been borrowed.

Commodity or Commodity-Related Equity Risks. Prices may fluctuate widely over short time periods in commodities. Investing in commodities or related equities expose investors to currency, political, accounting, economic and market risk. Because the strategy is heavily weighted in specific sectors, it will be impacted by sector performance more than a strategy with broader sector diversification. A non-diversified portfolio may be more susceptible to any single economic, political or regulatory event affecting an issuer than is a diversified portfolio. Lack of liquidity in an ETF could result in its value being more volatile than the underlying portfolio of securities.

Foreign Investing Risks. Investing in securities of non-U.S. companies involves special risks and considerations not typically associated with investing in U.S. companies, and the values of non-U.S. securities may be more volatile than those of U.S. securities. The values of non-U.S. securities are subject to economic and political developments in countries and regions where the issuers operate or are domiciled, or where the securities are traded, such as changes in economic or monetary policies. Values may be affected by restrictions on receiving the investment proceeds from a non-U.S. country. In general, less information is publicly available about non-U.S. companies than about U.S. companies. Non-U.S. companies also are generally not subject to the same accounting, auditing and financial reporting standards as are U.S. companies. Certain foreign issuers classified as passive foreign investment companies may be subject to additional taxation risk. Because the foreign securities in which a strategy invests generally trade in currencies other than the U.S. dollar, changes in currency exchange rates will affect the value of dividends and interest earned, and gains and losses realized on the sale of securities. Generally, a strong U.S. dollar relative to such other currencies will adversely affect the value of holdings in foreign securities.

For shareholders or potential shareholders in the investment companies (mutual funds) portfolios managed by BMO AM, please refer to the prospectuses and statements of additional information of those funds for a complete description of risks associated with the mutual funds. For investors or potential investors in private investment pools/funds, please refer to the offering documents of those pools/funds for a complete description of the risks associated with such pool/fund.

Item 9 - Disciplinary Information

There have been no legal or disciplinary events involving BMO AM or any of our employees involving investments or otherwise material to a client's evaluation of our advisory business or the integrity of our management.

Item 10 - Other Financial Industry Activities and Affiliations

BMO Global Asset Management is the brand name for various affiliated entities of BMO Financial Group, that provide trust, custody, securities lending, and investment management services. Certain of the products and services offered under the brand name BMO Global Asset Management are designed specifically for various categories of investors in a number of different countries and regions. Those products and services are only offered to such investors in those countries and regions in accordance with applicable laws and regulations. BMO Financial Group is a service mark of Bank of Montreal (BMO).

BMO Global Asset Management includes BMO AM, BMO Asset Management (Canada) ®, BMO Global Asset Management (Europe) Limited, BMO Trust and Custody Services (a division of BMO Harris Bank, N.A.), and BMO's specialized investment boutiques: Monegy, Inc. ®, Pyrford International Ltd, Lloyd George Management, and Taplin, Canida & Habacht, LLC. BMO Asset Management (Canada) ® includes BMO Asset Management Inc. Lloyd George Management consists of the subsidiaries of LGM (Bermuda) Ltd. and BMO Global Asset Management (Europe) Limited. BMO Global Asset Management (Europe) Limited is a wholly owned subsidiary of the Bank of Montreal and consists of a number of affiliated investment firms in the F&C Group, including F&C Management Limited, which are held in common ownership by F&C Asset Management plc. BMO Global Asset Management is part of the BMO Financial Group, a service mark of Bank of Montreal.

When appropriate, employees of BMO AM may provide information, marketing materials and disclosure documents to clients or potential clients of companies that are constituents of BMO Global Asset Management in a number of different countries and regions. These products or services are only offered to such investors in those countries and regions in accordance with applicable laws and regulations. Alternatively, other constituents of BMO Global Asset Management may provide information, marketing materials and disclosure documents with respect to such constituents' products and services to clients or potential clients of BMO AM.

Investment products are not FDIC insured, have no bank guarantee and may lose value.

BMO AM is registered as a Commodity Trading Adviser and Commodity Pool Operator with the Commodity Futures Trading Commission ("CFTC"), and is a member of the National Futures Association ("NFA").

See Item 14 (Client Referrals and Other Compensation) for additional information on client referrals and other compensation between BMO AM and its affiliates.

BMO AM clients, regardless of their advisory relationship, are under no obligation to use BMO Harris Bank, N.A., or any other BMO Financial Group affiliate as custodian of their assets.

BMO AM serves as investment adviser to the BMO Funds, a series of registered investment companies, and also to the BMO LGM Frontier Markets Fund. BMO AM, or an affiliate, also manage private investment pools. Information about each such private investment pools follows.

BMO AM is the general partner of *M&I Investment Partners I, Limited Partnership*, which invests in another private equity investment fund that, in turn, invests in undermanaged middle market companies. BMO AM provides investment advisory services to the Fund.

BMO AM is the general partner of *M&I Investment Partners III, Limited Partnership*, which invests in another private equity investment fund that, in turn, focuses on buyout and control-oriented investments in lower middle market companies located in the Midwestern United States, particularly family-owned businesses and orphaned divisions of larger corporations. BMO AM provides investment advisory services to the Fund.

BMO AM is the general partner of the *Diversified Real Estate Income Fund L.P.*, which invests in a multi-manager pooled fund that will invest in open and closed end funds in the real estate sector. BMO AM provides investment advisory services to the Fund.

BMO Harris Bank, an entity under common control with BMO AM is the manager of the *BMO Securities Lending Fund, LLC*, which has been established for the investment and reinvestment of cash collateral on behalf of clients of BMO Harris Bank who participate in its securities lending program as lenders. BMO Harris Bank has hired BMO AM to provide investment advisory services to the Fund.

BMO AM is the Manager and Investment Adviser, and CTCmyCFO, LLC (F/K/A/Harris myCFO, LLC), an affiliate, is the Investment Subadviser, to the *Real Asset Access Fund, LLC*, which primarily invests in real asset strategies by purchasing interests of actively and passively managed long-only portfolios, separately managed accounts, exchange traded funds (“ETFs”) and structured products, as well as limited and general partnerships, unit trusts, other investment entities commonly referred to as “hedge funds” and public investment funds (i.e. mutual funds). Prior to January 1, 2014, CTC myCFO, LLC, served as Investment Adviser.

BMO AM is the Manager and Investment Adviser, and CTC myCFO, LLC is the Investment Subadviser, to the *Porthos Hedged Fund of Funds, LLC*, which allocates its assets for investments in other portfolio funds managed by portfolio managers that pursue alternative investment strategies, commonly referred to as “hedge funds.” Prior to January 1, 2014, CTC myCFO, LLC, an affiliate, as successor to CTC Consulting LLC, served as Investment Adviser.

BMO AM is the Manager and Investment Adviser of International Stock Fund, LLC, which invests in the equities of companies with a minimum stock market capitalization of

U.S. \$300 million and that are listed, traded, or dealt in on any stock exchange or regulated market, with a particular emphasis on stock exchanges and regulated markets in countries located in the MSCI EAFE Developed Countries.

BMO AM is the Manager and Investment Adviser of Global Low Volatility Equity Fund, LLC, which invests primarily in the equities of low risk companies (where risk is measured by price volatility) with a minimum stock market capitalization of U.S. \$300 million and that are listed, traded, or dealt in on any stock exchange or regulated market in the developed and emerging market countries making up the MSCI All Country World Index.

BMO AM is the Investment Manager of the Pyrford International Trust. Prior to July 22, 2014, Pyrford International, Ltd., an affiliate, served as Investment Manager. The Trust invests primarily in equity securities issued by companies organized or having substantial operations outside the United States, but may also invest a portion of its assets in U.S. debt securities from time to time.

BMO AM is the manager of the F&C Commingled Fund II Limited, which is an umbrella fund that invests in companies that contribute to or benefit from the sustainable economic development of the emerging markets countries. Prior to November 30, 2015, F&C Fund Management Limited served as the investment manager to the Fund. BMO AM provides certain portfolio management, risk management, marketing and other services to the Fund.

BMO AM is the Asset Manager for the Great Lakes CLO 2012-1 LTD, the Great Lakes CLO 2014-1 LTD and the Great Lakes CLO 2015-1 LTD which are secured portfolios consisting of primarily senior secured middle market loans. BMO AM provides portfolio management, advisory and administrative functions with respect to the funds' assets.

Money, Inc., ("Money") is a wholly owned subsidiary of BMO AM. BMO AM provides compliance, accounting, operations, marketing, and management services to Money. Money may provide investment advisory and research services to BMO AM. BMO AM and Money receive fees at prevailing market rates for such services. Money looks to its Investment Policy Committee to oversee general portfolio management and general investment advice to Money. Certain individuals of BMO AM are regular members of Money's Investment Policy Committee and Board of Directors.

Taplin, Canida & Habacht, LLC ("TCH"), is a wholly owned subsidiary of BMO AM. BMO AM provides research services, compliance, marketing, and human resource services to TCH. TCH may provide investment advisory and research services to BMO AM. BMO AM and TCH receive fees at prevailing market rates for such services. Certain individuals of BMO AM are members of TCH's Management Committee. Certain individuals of TCH may also be dual officers of BMO AM for the purpose of providing portfolio management services.

BMO Harris Bank provides services to the BMO Funds and to other accounts managed by BMO AM such as custodian and securities lending agent. BMO AM and BMO Harris Bank use a common trading desk and have shared arrangements with investment research vendors.

In certain circumstances, BMO AM employees are registered representatives of an affiliated broker-dealer, including BMO Investment Distributors, LLC or BHFA.

BMO AM does not, with respect to any of the services it provides, trade with BHFA or any other affiliated broker-dealer. BMO AM serves as shareholder servicing agent and administrator for BMO Funds. BMO AM provides performance measurement services to BMO Harris Bank for the benefit of its clients.

Furthermore, BMO AM may have common management and officers with some of its affiliates, including with affiliated investment advisers. BMO AM shares facilities with affiliates and relies on BMO, BMO Financial Corp. and other affiliates such as BMO Harris Bank, for various administrative support, including information technology, human resources, business continuity, legal, compliance, finance, enterprise risk management, internal audit, and general administrative support.

These affiliations can create potential conflicts of interest. BMO AM seeks to mitigate these potential conflicts of interests through a governance committee structure and by maintaining policies and procedures, including a code of ethics, custody and trading.

BMO AM does not receive compensation from other investment advisers recommended or selected for clients. BMO AM has hired affiliated managers to sub-advise certain of the BMO Funds. BMO AM's management teams and the Board of Directors of BMO Funds regularly review the performance and activities of these firms.

From time to time, BMO AM also may recommend third party investment advisers who also sub-advise products that BMO AM offers. BMO AM does not receive compensation for making these recommendations. As this represents a potential conflict of interest, BMO AM maintains policies, procedures and controls which it believes are reasonably designed to ensure such conflicts are addressed.

Item 11 - Code of Ethics, Participation or Interests in Client Transactions and Personal Trading

Code of Ethics. BMO AM's supervised persons may purchase or sell securities that are also recommended for purchase or sale by BMO AM in client accounts. BMO AM maintains a Code of Ethics pursuant to which all of its supervised persons are required to adhere to the highest duty of trust and fair dealing and to place the interests of the clients and the shareholders of the registered investment company clients ahead of their own personal interests or the interests of others. Under the Code of Ethics, all supervised persons owe a fiduciary duty to, among others, the shareholders of each registered investment company advised by BMO AM and all other clients of BMO AM to conduct their personal securities transactions in a manner that

neither interferes with any client's portfolio transactions nor otherwise takes unfair or inappropriate advantage of an employee's relationship to such client. The Code of Ethics, which includes BMO AM's policies that address matters relating to compliance with laws, conflicts of interest, client gifts and entertainment, and personal trading and reporting and insider trading, is intended to assist employees in carrying out their duties as fiduciaries to clients. A copy of BMO AM's Code of Ethics is available upon request.

A related person of BMO AM may from time to time own securities which BMO AM recommends to clients or invest in investment vehicles which BMO AM recommends to clients. Any related person is subject to BMO AM's Insider Trading Policy which prohibits trading on material, non-public information and BMO AM's Code of Ethics which restricts personal securities transactions by BMO AM's related persons and any supervised person (as defined in the Code of Ethics).

The Code of Ethics provides for the imposition of sanctions against those persons who violate the Code. Compliance personnel oversee the Code of Ethics' operation, review holdings reports, and review personal securities transaction reports.

Investment in Companies with Common Directors. From time to time, BMO AM may invest client assets in equity or debt securities issued by a publicly held company with an executive officer or director who serves as a director of BMO, BMO Financial Corp. or other affiliates. Such investments will occur when BMO AM determines that the nature of the investment (including, in the case of debt instruments, available yield, credit quality and terms when compared to other available debt instruments), is consistent with the best interests of the client. Such investments may occur in open market transactions or in transactions negotiated directly with the issuer.

Certain Investments. From time-to-time, BMO AM personnel may invest client assets in, or recommend that clients invest in, shares of mutual funds for which BMO AM and its affiliates provide investment management, custodial, administrative, shareholder support and other services in exchange for fees and direct or indirect benefits. BMO AM may also recommend that clients invest in the private limited partnerships described in Item 10 (Other Financial Industry Activities and Affiliations) in which BMO AM or an affiliate serves as general partner and receives fees or other direct or indirect benefits. Such investments may present a conflict of interest because BMO AM or a related person has a financial interest in the transaction. BMO AM maintains policies, procedures and controls which it believes are reasonably designed to ensure such conflicts are addressed.

Investments in BMO Securities. BMO AM generally does not purchase Bank of Montreal securities on behalf of client accounts. However, from time-to-time, clients may direct BMO AM to purchase Bank of Montreal securities. The client's direction must be in writing. Bank of Montreal is BMO AM's parent company.

Participation in Client Transactions. BMO AM does not generally engage in principal or agency cross transactions or trading with affiliates. BMO AM would seek permission from the client prior to engaging in such transaction.

If permitted by a client's investment objectives, and subject to compliance with applicable law, regulations and exemptions, BMO AM may purchase securities for client accounts during an underwriting or other offering of such securities in which a broker-dealer affiliate of BMO AM acts as a manager, co-manager, underwriter or placement agent. Although BMO AM will not purchase any securities directly from its affiliate, BMO AM's affiliate may receive a benefit in the form of management, underwriting or other fees in connection with its participation in the offering. Typically, the "manager's account" of BMO AM's affiliate will not be credited with the any purchase on behalf of BMO AM's clients.

Item 12 - Brokerage Practices

Broker Selection and Soft Dollar Practices. BMO AM may exercise discretion to select and establish securities quantities and process transactions through one or more securities brokerage firms. Allocation of portfolio brokerage transactions, including their frequency, to various brokers and dealers is determined by BMO AM in its best judgment and in a manner deemed fair and reasonable to clients. The primary consideration in selecting broker-dealers is best execution – *e.g.*, the prompt and efficient execution of orders in an effective manner at the most favorable price. In some instances, the clients direct BMO AM to place trades through or with a particular broker or dealer. In such cases, BMO AM cannot necessarily obtain best pricing or execution.

In approving broker-dealers for its clients' trades, BMO AM considers, among other factors, their financial and operational integrity and the quality and reliability of their execution. BMO AM selects broker-dealers for each trade based on its criteria for "best execution." These include, among other considerations, commissions, price impact under conditions prevailing at the time of the trade, size of the order, difficulty of execution, speed of execution, and capital commitments by the broker-dealer. Client referrals are not a factor in selecting broker-dealers.

Subject to its duty to seek best execution, BMO AM may place trades through and with broker-dealers who also provide BMO AM with research and brokerage services (as defined by Section 28(e) of the Securities Exchange Act of 1934, as amended), so-called "soft dollar" arrangements. These services must provide lawful and appropriate assistance to BMO AM in carrying out its investment decision-making responsibilities or trade execution processes. Such services may include: databases, data services, analytical services and publications that provide advice as to the value of securities; the advisability of investing in, purchasing or selling securities; the availability of securities or purchasers or sellers of securities; furnishing analysis and reports concerning issues, industries, securities, economic factors and trends, portfolio strategy and performance of accounts; communications services related to the execution, clearing, and settlement of securities transactions; and other functions incidental to effecting securities transactions; and other similar services. The provision for such services is taken into account in broker selection and, in exchange for these services, BMO AM may pay higher commissions than would otherwise be charged (*i.e.*, "pay up"). Before effecting any such transaction, BMO AM determines in good faith that the amount of such commission is reasonable in relation to the value of the brokerage and research services provided by such brokers, viewed in terms of either that particular transaction or BMO AM's overall responsibilities to all of its clients.

Due to the nature of soft dollar arrangements, BMO AM may obtain services from brokerage commissions charged to client's account that may not directly benefit such client at that particular time. Similarly, clients may benefit from soft-dollar research even if trades placed on their behalf did not contribute to the compensation of the broker-dealer providing such research. While BMO AM does not seek to allocate soft dollar benefits to client accounts proportionately to the soft dollar credits the accounts generated, BMO AM endeavors to ensure that, over time, all clients receive the benefit of services purchased with brokerage commissions charged to their accounts and to the accounts of its other clients.

In addition, BMO AM may receive certain brokerage and research products and services, some of which are permitted under soft dollar arrangements and some of which are not (so-called "mixed-use" products and services). In these instances, BMO AM uses client brokerage commissions to pay for the eligible portions and pays the ineligible portions with its own funds. Although this allocation between eligible and ineligible items is made in accordance with BMO AM's overall fiduciary responsibilities, clients should be aware of the potential conflicts of interest created by the use and allocations of soft dollar arrangements. Although the allocation between soft dollars and cash is not always capable of precise calculation, BMO AM makes a good faith effort to allocate such items reasonably, and records of such allocations are kept.

When BMO AM accepts these "soft dollar" benefits, it does not have to produce or pay for research, other products, or services acquired with soft dollars. BMO AM may therefore have a conflict of interest because it may have an incentive to select broker-dealers based on its interest in receiving research or other products or services rather than on its clients' interest in obtaining the most favorable execution.

BMO AM regularly monitors and evaluates soft dollar benefits gained from client transactions. As such, BMO AM has adopted policies and procedures that are used to determine whether the amount of commissions paid to broker-dealers is reasonable in relation to the value of the research or brokerage products or services received.

Additional information in accordance with the CFA Institute's Soft Dollar Standards concerning BMO AM's soft dollar arrangements is available on request, including (i) a description by broker of the products and services on a firm-wide basis that BMO AM received from brokers, whether proprietary or through a third party research arrangement, and (ii) a report on the total amount of commissions generated for the requesting client account through soft dollar arrangements by broker, as well as the total amount of brokerage directed by the requesting client through directed brokerage arrangements.

Commission Rates. In executing securities transactions, BMO AM will seek to obtain the best combination of price and execution available with respect to each transaction, in light of the overall quality of brokerage and research services provided to it or its clients. The best price means the best net price without regard to the mix between purchase or sale price and commissions, if any. While BMO AM seeks reasonably competitive commission rates, the accounts do not necessarily pay the lowest available commission. Receipt of products or services other than brokerage or research is not a factor in allocating brokerage.

Trade Aggregation and Allocation. BMO AM manages accounts with both similar and different investment strategies all of which may trade in the same securities. BMO AM, upon receiving incoming orders of similar purchases and sales of securities for clients, determines the sequencing of such orders among clients. BMO AM attempts to coordinate the timing of orders to prevent BMO AM from “bidding against itself” on such orders.

BMO AM may aggregate orders for more than one client’s account to form a “block” order for the purpose of seeking a better price and execution. BMO AM may allocate transactions in securities among clients on such basis as BMO AM determines to be reasonable, including a determination that some clients may not purchase or sell the securities at the same time as others; subsequently, BMO AM may not obtain the same commission rates or execution prices for all clients. However, BMO AM typically allocates to each customer’s position within the block on a pro rata basis. When an aggregated order is filled, as ordered, clients receive an average execution price, share transaction costs, and receive pro rata shares. When an aggregated order is only partially filled, the securities are typically allocated on a pro rata basis to each account participating in the aggregated order based upon the initial amount requested for the account, subject to certain exceptions, and each participating account will participate at the average execution price for the aggregated order.

Notwithstanding the foregoing, if an aggregated order involves fixed income securities, the order may be allocated based on the needs of the underlying client accounts. In addition, BMO AM for fixed income securities may, from time to time, depending upon circumstances such as account guidelines, objectives, or cash-flow characteristics, place a trade prior to an actual trade allocation being determined. In those instances where an order is only partially filled or when a security is acquired prior to determining the allocation, the portfolio manager and/or trader ultimately allocates the trade in a manner that is fair and equitable to all affected accounts over time. Furthermore, the portfolio manager and/or trader may also seek bonds with similar characteristics, such as credit name, structure, call/put options, credit rating, sector, etc., trading in the market at the time, in such situations.

Orders for directed brokerage clients are sequenced behind orders for non-directed brokerage clients, depending upon factors such as the number of other orders awaiting execution, the type of order, the liquidity of the order, and clients’ cash positions. Wrap accounts participate in a separate sequencing and rotation schedule apart from BMO AM’s separately managed accounts in order that no such account, client type, or strategy is systematically favored or disadvantaged.

In order to start a new strategy, BMO AM may establish an account with funds provided by BMO AM or an affiliate. This account is managed along with other client accounts in such a way that the “proprietary” account does not receive favorable treatment over other client accounts. BMO AM personnel may be investors in certain pooled vehicles for which BMO AM acts as adviser. Such investment vehicles are treated as clients and are not subject to the personal trading restrictions of the Code as described in Item 11 (Code of Ethics, Participation or Interests in Client Transactions and Personal Trading). Orders for such pooled vehicles will be aggregated with orders for other client accounts for purposes of trade execution.

IPO Allocations. New issues (“New Issues”), including initial public offerings (“IPO”), are typically allocated on a pro-rata basis across eligible accounts. Not all clients are eligible to participate in New Issues. New Issues may be limited to the clients of one or more of BMO AM’s investment strategies. In addition, some clients may be limited or restricted in their ability to participate in a particular IPO or any IPO due to certain restrictions, such as client guidelines or IPO allocation rules issued by the Financial Industry Regulatory Authority, Inc. (“FINRA”). Furthermore, the availability of IPO securities, especially those of so-called “hot issues,” is typically limited and BMO AM may receive only a de minimis allocation. Such de minimis allocations may be insufficient to allow a pro rata allocation to all participating accounts. This may result in some clients not being able to fully participate, or to participate at all, in such opportunities. When BMO AM receives a de minimis allocation of an IPO, BMO AM may allocate shares only investment companies managed by BMO AM, such as the BMO Funds, and not to other accounts or may use another method to allocate shares to accounts that does not systematically favor or disadvantage clients. De minimis allocations refer to IPO allocations received from the broker-dealer that are, as determined by BMO AM, significantly less than the initial order of indication or represent a small percentage of the assets in the BMO Fund(s) participating in such IPO. If the New Issue involves fixed income securities, the order may be allocated based on the needs of the underlying client accounts, as described under Trade Aggregation and Allocation section above. Clients who direct BMO AM to use a particular broker to execute trades for their accounts will generally be unable to participate in IPOs.

If permitted by a client’s investment objectives, and subject to compliance with applicable law, regulations and exemptions, BMO AM may purchase securities for client accounts during an underwriting or other offering of such securities in which a broker-dealer affiliate of BMO AM acts as a manager, co-manager, underwriter or placement agent. Although BMO AM will not purchase any securities directly from its affiliate, BMO AM's affiliate may receive a benefit in the form of management, underwriting or other fees in connection with its participation in the offering. Typically, the “manager’s account” of BMO AM’s affiliate will not be credited with the any purchase on behalf of BMO AM's clients.

Directed Brokerage. BMO AM may permit directed brokerage (situations where clients direct or restrict brokerage for their accounts) on an exception basis, subject to specific terms and limitations, and if such use complies with applicable law and governing instruments. Clients who utilize directed brokerage have the ability to direct all or a portion of their brokerage to a specific broker-dealer, if such use complies with applicable law and governing instruments. BMO AM attempts to fulfill client-directed brokerage subject to achieving best execution. However, the client-directed broker may not offer the lowest commission rate nor obtain the same execution price and efficiency as that obtained by BMO AM for its non-directed account trades. By utilizing directed brokerage for transactions, the client acknowledges that BMO AM is not able to freely negotiate commission rates or spreads or to commingle or group orders with those for other accounts managed by BMO AM. Directed brokerage account trades are handled as separate orders. These orders are placed subsequent to those for BMO AM’s participating non-directed trades, and trades are rotated among these directed accounts to help to ensure that no such account is systematically favored or disadvantaged. For clients who direct only a portion of their transactions, the non-directed portion will be commingled or grouped for the purpose of execution for the same securities for other accounts managed by BMO AM.

Stepout Transactions. BMO AM in certain limited instances engages in “stepout” brokerage transactions to meet the requirements of certain client agreements. When engaging in a stepout transaction, BMO AM will direct a trade to a broker-dealer who executes the transaction, while a second broker-dealer clears and settles the transaction. The first broker-dealer then shares all or part of its commission with the second broker-dealer, who actively participates in the transaction. BMO AM engages in stepout transactions under the belief that doing so will be in the client’s best interest (and/or undertaken as required under the client(s) agreement), however, there can be no assurance that we will be able to step-out transactions, or, if we are able to step-out the transactions, that we will be able to obtain more favorable execution than if we had not stepped-out the transactions.

Cross Trades. BMO AM may cross transactions between accounts of different clients only if such transactions are fair to both clients, are not prohibited by law or the instruments governing the relationships, and provide no benefits to BMO AM. For all such transactions, evidence of an independent valuation source will be maintained. For example, before executing a cross trade, the trader or portfolio manager may solicit a competitive bid and offer to determine price. Cross trades involving securities held by a mutual fund client must comply with the requirements applicable to joint transactions under the Investment Company Act of 1940, as amended. Crossing transactions between client accounts may cause BMO AM to have a conflict of interest between two client accounts since it is recommending that one client purchase a security it has recommended be sold by another.

Principal transactions are generally defined as transactions for which an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise when an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer. BMO AM does not engage in principal or agency cross transactions.

Trading Errors. During the course of BMO AM’s daily securities order processing activities for client accounts, trading errors may inadvertently occur. BMO AM will take steps to correct the error as soon as practicable. In taking corrective action, BMO AM seeks to ensure that all BMO AM accounts negatively impacted by the error are placed back in the same position they would have been had the error not occurred. Any gains resulting from these transactions will be left to the client’s account and any losses, including transaction costs to correct the trade, will be promptly reimbursed to the client’s account. Correcting transactions that yield both gains and losses may be netted and BMO AM will reimburse any net loss.

Item 13 - Review of Accounts

BMO AM employs various pre- and post-trade controls and monitoring techniques through automated and manual procedures in an effort to ensure that portfolios are managed in accordance with client-specific guidelines or restrictions.

Separately Managed Accounts. Portfolio managers review the securities and assets held in each client's account no less frequently than monthly. Portfolio managers are instructed to notify designated senior officers of the Investment Committee of any irregularities or unusually poor performance with respect to a client's account.

Prior to acceptance of a new account, BMO AM conducts an initial review of the account's investment objectives. Thereafter, in addition to the monthly portfolio manager reviews, BMO AM formally reviews each account no less frequently than annually.

In general, clients receive a quarterly report that summarizes the performance of their account during the immediately preceding quarter. Clients also meet with relationship managers and/or portfolio managers on a quarterly, semi-annual, or annual basis as agreed by the client and the assigned portfolio manager. During such meetings, the relationship managers and/or portfolio managers review with the client relevant objectives, guidelines, securities in the client's account, investment performance and current investment strategy. Moreover, the relationship manager and/or portfolio managers provide a report at such meetings and will occasionally modify the format or information contained in the reports to meet the needs of individual clients. In addition, each client's qualified custodian maintains the official book and record for the account and independently delivers statements to the client and/or client's designated agent. In addition to BMO AM's review and reconciliation, clients should also independently review and reconcile their qualified custodian's records.

Mutual Fund Clients. BMO AM submits quarterly reports to the board of directors of any mutual fund to which it provides investment management services. The reports generally contain information about the fund's holdings, current market and economic conditions, and investment techniques used to implement such fund's investment strategy. In addition, BMO AM provides fund shareholders an annual report, which discusses investment performance and relevant market and economic conditions affecting the fund, and fund holdings. Additional information on fund investments is also available to shareholders in such fund's semi-annual report. Furthermore, for such funds, a complete schedule of portfolio holdings for the first and third fiscal quarters is filed with the SEC on Form N-Q.

Item 14 - Client Referrals and Other Compensation

As noted in Item 12 (Brokerage Practices), BMO AM receives a variety of services (soft dollar services) from third parties that are paid for by the use of clients' commissions (soft dollars).

BMO AM compensates its employees for client referrals. It also may enter into an arrangement whereby payments are made to Bank of Montreal, BMO Harris Bank, or other affiliates of BMO AM for clients referred to BMO AM by those affiliates. Such payments are made at BMO AM's expense and do not result in any additional fee to advisory clients. Related persons of BMO AM may receive incentive compensation for the introduction of new client accounts or the retention of existing clients. Alternatively, officers and employees of BMO AM may market products and services of its financial institution and investment advisory affiliates under solicitation agreements with those affiliates, and such persons receive incentive compensation related to such activities.

As noted in Item 4 (Advisory Business) BMO AM provides services to affiliates including BMO Harris Bank, BHFA, the BMO Funds, BMO Investment Distributors, LLC, and Third Party Wrap Programs sponsored by broker-dealers and other non-affiliated financial institutions. BMO AM will receive compensation for providing these services and participating in Third Party Wrap Platforms.

BMO AM has also entered into certain solicitation agreements with unrelated third parties. Pursuant to these solicitation arrangements, the solicitor receives a fee equal to a percentage of the overall client fees payable to BMO AM. In no instances do any sharing/compensation arrangements increase the costs or fees to clients above what they would have been in the absence of such arrangements. Details of the referral agreement are fully disclosed in a written disclosure statement provided to the client prior to such client's entry into an investment advisory agreement with BMO AM. All solicitation agreements comply with Rule 206(4)-3 under the Investment Advisers Act of 1940, as amended.

Item 15 - Custody

BMO AM may be deemed to have custody of client assets in instances where (i) an affiliated qualified custodian, such as BMO Harris Bank maintains custody of client accounts or (ii) BMO AM serves as general partner for a pooled investment vehicle, described in Item 10 (Other Financial Industry Activities and Affiliations). BMO AM clients, regardless of their advisory relationship, are under no obligation to use BMO Harris Bank, or any other BMO Financial Group affiliate as custodian of their assets.

Clients are responsible for selecting the qualified custodian at which their assets will be maintained. All clients for whom BMO AM is deemed to have custody receive quarterly account statements directly from the qualified custodian. **Please compare the information in BMO AM's client statements with the information in account statements provided by the custodian.** In addition, the pooled investment vehicles' financial statements are audited by a Public Company Accounting Oversight Board registered accounting firm and distributed to investors in the vehicles.

Item 16 - Investment Discretion

BMO AM performs its advisory services by exercising full discretionary authority with respect to its discretionary accounts. In general, there is no limitation on BMO AM's or any of its portfolio managers' authority to select specific securities or the amount of securities to purchase or sell. BMO AM usually receives discretionary authority to select the identity and amount of securities to be bought or sold for an account through the client's written agreement with BMO AM at the outset of an advisory relationship. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment guidelines for the client's account.

When selecting securities and determining amounts, BMO AM observes the investment guidelines, limitations and restrictions of the clients it advises. For registered investment companies, BMO AM's authority to trade securities may also be limited by certain federal

securities and tax laws that require diversification of investments and favor the holding of investments once made.

Clients may impose reasonable restrictions on the management of their accounts. Investment guidelines and restrictions must be provided to BMO AM in writing. Additionally, a client may be permitted to direct certain investment decisions in accordance with the client's written agreement with BMO AM.

In those instances where BMO AM provides non-discretionary or impersonal advisory services, such arrangements and limitations are outlined in the investment management agreement.

BMO AM may, from time-to-time depending upon account guidelines, objectives, cash-flow characteristics, brokerage direction, and other criteria, give advice to some clients or effect securities transactions for the accounts of some clients that may be similar to, or differ from, the advice given to or actions taken on behalf of other clients.

Item 17 - Voting Client Securities

BMO AM has developed joint proxy-voting policies with certain of its affiliates (together and individually, the "BMO Organization"). When acting as a fiduciary, the BMO Organization votes proxies in the sole interest of its fiduciary clients. Unless the client has directed otherwise, the BMO Organization generally votes proxies for securities held in client accounts and has adopted policies and procedures designed to help ensure that those proxies are voted in the best interests of fiduciary clients.

Proxy Advisory Committee (PAC) of the BMO Organization. The PAC establishes general policies and guidelines for proxy voting. The PAC has the authority to vote proxies of companies whose securities are held in more than one fiduciary account (or related groups of accounts) managed by BMO AM and certain other members of the BMO Organization.

How We Vote Proxies. The PAC's guiding principle is to vote proxies in the interest of the beneficiaries, both current and future, with a view to enhancing the value of securities held for the benefit of our clients. The PAC utilizes the services of a proxy voting agent ("Agent") to provide research on particular corporate issuers and to assist in voting proxies in accordance with BMO's proxy voting policies. If a proxy issue is not addressed by the PAC's voting policies or requires further review, the Agent forwards the proxy to the PAC along with a recommendation on how to vote the proxy. Upon review of the issue and taking into consideration the Agent's recommendation as well as analysis by the various committee members, the PAC directs the Agent how to vote. If the Agent is unable to provide a recommendation, the PAC will review the issue based on the best available information and direct the Agent how to vote. If an issue arises which is expected to recur frequently, the PAC develops a policy on that issue and transmits the policy to the Agent. The PAC currently uses Institutional Shareholder Services Inc. as the Agent.

Mutual Fund Proxies. When mutual funds are held in client accounts, proxy issues involving the fund's fundamental investment policies are voted on by the Agent on a case-by-case basis according to the PAC's policies. Certain other issues (*e.g.*, increases in investment

management fees, selection of investments advisers, changes in investment objectives, changes in strategy that increase portfolio risk) are also evaluated and voted on by the Agent on a case-by-case basis. To the extent that legally permissible proposals seek to eliminate shareholder voting on changes to these types of matters, they are opposed. All other proposals are to be voted on in accordance with existing proxy voting policy. Proxy proposals relating to those funds for which BMO AM acts as sub-adviser are governed by the policy concerning conflicts of interest.

Conflicts of Interest. The Agent votes on most proxy matters in accordance with the PAC's procedures, independently of any interest the BMO Organization may have in the proposal. A conflict of interest may exist, however, if, the Agent has referred a proxy question to the PAC as otherwise required by proxy procedures, and BMO AM or an affiliated entity has a business relationship with (or is actively soliciting business from) either the company soliciting the proxy or a third party that itself has either a material interest in the outcome of a proxy vote or is actively lobbying for a particular outcome of a proxy vote. Individual conflicts of interest also may arise if, a member of the PAC holds a position in a security that is the subject of a proxy vote. When a PAC member is conflicted, he is expected to recuse himself. When the BMO Organization is conflicted, various procedures may be followed to avoid impropriety, including, as appropriate, retaining the Agent or some other independent third party to vote the proxy in accordance with the shareholders' interests.

Clients may expressly retain the right and obligation to vote any proxies relating to securities held by/in their account(s) by providing prior written notice to BMO AM. Any changes to a client's proxy voting instructions must be received in writing. Clients may obtain a copy of BMO AM's complete proxy voting policies and procedures upon request, and may request and receive information about how BMO AM voted any proxies on behalf of their account.

Item 18 - Financial Information

BMO AM does not have any financial condition reasonably likely to impair its ability to meet contractual commitments to clients and has not been the subject of a bankruptcy proceeding. A balance sheet is not required to be provided because BMO AM does not require prepayment of more than \$1,200 in fees per client six months or more in advance.

Additional Information

Privacy Policy. BMO AM's Privacy Notice, which includes information about the collection and sharing of client information by BMO AM (including, the sharing of information with affiliates and third parties), is available upon request.

Anti-Money Laundering.

To help the government fight the funding of terrorism and money laundering activities, federal law requires all financial institutions to obtain, verify, and record information that identifies each person who or business entity that opens an account.

When you open an account, we will ask for your name, address, date of birth, and other information that will allow us to identify you. We may also ask you to provide a copy of your driver's license or other identifying documents.

A corporation, partnership, trust or other legal entity may need to provide other information, such as its principal place of business, local office, employer identification number, certificate of incorporation, government-issued business license, partnership agreement, trust agreement, or other identifying documents.

The information you provide in this form may be used to verify your identity by using internal sources and third party vendors. If the requested information is not provided within thirty (30) calendar days, the account will be subject to closure.

BMO AM may be required to disclose information collected in accordance with our Anti-Money Laundering Program pursuant to applicable laws, rules or regulations, but that information will otherwise be retained in confidence according to BMO AM's privacy policy.