

BMO DIRECT INVEST INC.

CUSTOMER RELATIONSHIP SUMMARY FORM

INTRODUCTION

BMO Direct Invest Inc. (BDI) is an investment adviser registered with the Securities and Exchange Commission and does not provide broker-dealer (“brokerage”) services. It is important for our customers to understand that investment advisory services and fees differ from brokerage. This summary provides disclosure for the BMO Smart Portfolio Wrap Fee Program available to certain retail customers. You can find free and simple tools at the Commission’s website, www.Investor.gov/CRS, to research firms and financial professionals, and explore educational materials about investment advisers and investing.

WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

Overview of services: We provide digital hybrid portfolio management wrap fee accounts to individual retail investors via our online investment services platform called BMO Smart Portfolio provided by BNY Mellon Advisers Inc. (“BNYMA”). Clients also have access to interact with an investment adviser representative (“Smart Portfolio Advisor”) via telephone to assist Clients by answering questions regarding BMO Smart Portfolio, their Investment Proposal, the Models, the Risk Tolerance Questionnaire (RTQ), requested restrictions related to the management of their account, other account related questions, or regarding our financial planning services (see below). Our recommendation process begins with Clients completing the online RTQ and an investor profile which determines the Client’s financial needs and investment objectives by gathering and analyzing Client investor profile and risk tolerance information. The RTQ scores the Clients Investor Profile to recommend one of five categories of model portfolio investment strategies (“Model” or “Model Portfolios”) which the Client may select for purposes of managing trading in their accounts: Conservative Income, Conservative Growth, Balanced, Capital Growth and Maximum Growth. In addition to our digital portfolio management accounts, financial planning services are also available to interested clients in the BMO Smart Portfolio Program, subject to account minimum asset requirements that BDI requires in its discretion. For more detail on our Advisory Services see BDI’s ADV Part 2A Appendix 1 Brochure (“Brochure”).

Monitoring: Clients will receive quarterly and annual notices prompting them to update any changes to their Investment Profile and whether they wish to impose or modify reasonable restrictions on the management of their account. BNYMA acts as discretionary Portfolio Manager for accounts and monitors your account for drift from the target asset allocations for your Model and will rebalance individual ETF positions as needed. BDI does not monitor financial plans, which are complete upon delivery of the plans, unless we agree to update your plan.

Investment authority: When a Client establishes an account, it grants Portfolio Manager limited discretionary trading authority with respect to assets in the Client’s account, which includes the authority to implement, in its discretion, Model changes received from the Model Provider, and to rebalance the account in accordance with target allocations and program trading parameters established by BDI. The Portfolio Manager will, in its discretion, implement and manage Client accounts based on the selected Model for a Client’s account.

Limited investment offerings: We only offer Model Portfolios created by our affiliate BMO Bank N.A. (“Model Provider”). We do not offer non-affiliate model portfolios. Model portfolio strategies are constructed based on non-proprietary Exchange Traded Funds (ETFs) and money market funds.

Account minimums and other requirements: Our account minimum is \$5,000. Clients must also have online access, consent to electronic delivery and use of electronic signatures. Clients must be a personal banking (retail) customer of BMO Bank N.A. and enrolled in BMO Digital Banking. Once the BMO Smart Portfolio account is open, the client can choose to close their personal banking (retail) account of BMO Bank N.A. BMO Smart Portfolio only offers individual and joint accounts, as well as individual IRA, Roth IRA, and Rollover IRA accounts. All Clients must also maintain a custodial account with Pershing Advisor Solutions, LLC (PAS).

Additional Information: A copy of this form and additional information about the firm and its services are available in our Brochure at www.bmo.com/smartportfolio.

Conversation Starters:

- Given my financial situation, should I choose an investment advisory service? Why or why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

FEES, COSTS, CONFLICTS, AND STANDARDS OF CONDUCT

What fees will I pay? Clients pay an annual wrap, or bundled, fee of 0.60%, calculated as a percentage of your account assets, and deducted from your account on a monthly basis. Asset-based fees associated with the wrap fee program include not only investment adviser fees but also most transactions costs and fees paid to a broker-dealer (PAS) and custodian (Pershing LLC) that has custody of these assets, and therefore are higher than a typical asset-based advisory fee. There is also an annual Portfolio Platform Access Fee totaling \$48 and deducted at \$4 per month. Fees charged to an account are negotiable, flat or blended, or discounted at BDI’s sole and absolute discretion so that fees among individual clients vary. We have an incentive to encourage you to invest more funds because the higher the value of your advisory account, the more you will pay in wrap fees. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. Our current annual Fee Schedule is available in our Form ADV Part 2A Brochure.

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What third-party costs or other charges will I incur? Clients also pay administrative fees charged by PAS and Pershing for various functions including but not limited to delivery of checks, fund wires, account closing, and paper statements. These fees are outlined in the Fee Schedule posted on our website. The ETFs and money market fund in the model portfolios charge underlying fees and expenses that are separate and apart from the Advisory Fee charged by BDI. When assessing a wrap fee program's cost, clients should consider the amount of trading activity they anticipate, other wrap fee programs, and factors such as commission rates, their investment experience and knowledge, and their availability to monitor and rebalance investments themselves.

Questions to Ask:

- Help me understand how these fees and costs might affect my investments.
- If I give you \$5,000 to invest, how much will go to fees and costs, and how much will be invested for me?

WHAT ARE YOUR LEGAL OBLIGATIONS TO ME WHEN ACTING AS MY INVESTMENT ADVISER?

When we act as your investment adviser, we have to act in your best interest and not put our interests ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Below are some examples to help you understand what this means.

HOW ELSE DOES YOUR FIRM MAKE MONEY AND WHAT CONFLICTS OF INTEREST DO YOU HAVE?

We make money from the advisory fees we charge you. We offer model portfolios created by our affiliate BMO Bank N.A. Details regarding our conflicts are generally stated in our Form ADV, Part 2A Brochure include:

Service Agreement with Affiliate BMO Bank N.A. as Model Provider

BDI hired its affiliate BMO Bank N.A. as the Model Provider to develop the Model Portfolios. BMO Bank N.A. is compensated under a services agreement. BDI and BMO Bank N.A. are both wholly owned subsidiaries of BMO Financial Corp. BDI has a conflict of interest in hiring BMO Bank N.A. and using its models for its clients instead of recommending non-affiliated model providers and models.

BDI is a Related Adviser of Affiliate BMO Family Office (BMOFO)

BDI is permitted to register with the SEC because BDI and BMOFO are under common control of BMO Financial Corp. and have the same principal office and place of business as BMOFO. BMOFO provides research to BMO Bank N.A. which is a conflict of interest in using the Models based in part on research provided by BMOFO.

REFERRALS FROM BMO BANK N.A.

We receive client referrals from BMO Bank N.A. for which BMO Bank N.A. pays a nominal referral to BMO Bank N.A. employees for client referrals to BDI.

COMMON MANAGEMENT AND OFFICERS WITH SOME OF OUR AFFILIATES

We rely on BMO BANK N.A. and BMO Financial Corp. for various support functions.

Conversation Starters:

- Who is my primary contact person?
- Is he or she an investment advisor?
- Who can I talk to if I have concerns about how the person is treating me?

HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY? Our financial professionals are paid an annual salary and discretionary bonus.

DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

No. You may visit [Investor.gov/CRS](https://www.investor.gov/crs) for a free and simple search tool to research us and your financial professionals. You may also verify that a CFP's certification is in good standing on the CFP Board's "Find a Certified Financial Professional" page

www.letsmakeaplan.org/choose-a-cfp-professional/find-a-cfp-professional.

WHO IS MY PRIMARY CONTACT PERSON?

Any Smart Portfolio Advisor in our Smart Portfolio Advisor Contact Center 877-685-9057, 8AM – 7PM CT will be your primary contact person. Smart Portfolio Advisors are a registered representative of BDI.

IS HE OR SHE A REPRESENTATIVE OF AN INVESTMENT ADVISOR? WHO CAN I TALK TO IF I HAVE CONCERNS ABOUT HOW THE PERSON IS TREATING ME? You can contact BDI's Smart Portfolio Manager or a member of the Management Team if you have any concerns about a Smart Portfolio Advisor. Contact information for these individuals is listed on our website at

www.bmo.com/smartportfolio.

For more information about our advisory services or to obtain a copy of this form, contact us at 877-685-9057. We are available from 8AM – 7PM CT. Our address is 320 S. Canal Street, 12th Floor, Chicago, IL 60606 and on our website www.bmo.com/smartportfolio.