

BMO Investments Inc.  
First Canadian Place  
100 King Street West, 43<sup>rd</sup> Floor  
Toronto, ON M5X 1A1

January 29, 2021

British Columbia Securities Commission  
Alberta Securities Commission  
Financial and Consumer Affairs Authority of Saskatchewan  
The Manitoba Securities Commission  
Ontario Securities Commission  
Autorité des marchés financiers (Québec)  
Financial and Consumer Services Commission (New Brunswick)  
Nova Scotia Securities Commission  
Office of the Superintendent of Securities, Service Newfoundland & Labrador  
Office of the Superintendent of Securities, Government of Prince Edward Island  
Office of the Superintendent of Securities, Northwest Territories  
Office of the Yukon Superintendent of Securities  
Nunavut Securities Office

FROM: BMO Investments Inc. (BMOII) (The Distributor)

**RE: Compliance Report on National Instrument 81-102 for the year ended October 31, 2020**

**For: BMO Mutual Funds** *(As listed on Appendix A - Collectively referred to as the Funds)*

Dear Sir or Madam

We hereby confirm that we have complied with the applicable requirements of Parts 9, 10, and 11 of National Instrument 81-102 in respect of the Funds for the period from November 1, 2019, to October 31, 2020, except as follows:

With respect to Companion Policy 81-102CP recommendations concerning the operating procedures suggested for mutual funds trust accounts: due to a timing difference between the settlement of redemption orders and the movement of monies from the custodian, certain of the trust accounts were periodically overdrawn. The Manager paid any interest charged on the overdrafts.

**BMO Investments Inc.**

(signed) "Ross Kappelé"

Ross Kappelé  
Head and Ultimate Designated Person  
Investment Fund Manager Line of Business  
BMO Investments Inc.

## Appendix A

### BMO Mutual Funds (As at October 31, 2020)

BMO Ascent™ Balanced Portfolio  
 BMO Ascent™ Conservative Portfolio  
 BMO Ascent™ Equity Growth Portfolio  
 BMO Ascent™ Growth Portfolio  
 BMO Ascent™ Income Portfolio  
 BMO Asian Growth and Income Class  
 BMO Asian Growth and Income Fund  
 BMO Asset Allocation Fund  
 BMO Balanced ETF Portfolio  
 BMO Balanced ETF Portfolio Class  
 BMO Bond Fund  
 BMO Canadian Equity Class  
 BMO Canadian Equity ETF Fund  
 BMO Canadian Equity Fund  
 BMO Canadian Large Cap Equity Fund  
 BMO Canadian Small Cap Equity Fund  
 BMO Canadian Stock Selection Fund  
 BMO Concentrated Global Balanced Fund  
 BMO Concentrated Global Equity Fund  
 BMO Concentrated U.S. Equity Fund  
 BMO Conservative ETF Portfolio  
 BMO Core Bond Fund  
 BMO Core Plus Bond Fund  
 BMO Covered Call Canada High Dividend ETF Fund  
 BMO Covered Call Canadian Banks ETF Fund  
 BMO Covered Call Europe High Dividend ETF Fund  
 BMO Covered Call U.S. High Dividend ETF Fund  
 BMO Crossover Bond Fund  
 BMO Diversified Income Portfolio  
 BMO Dividend Class  
 BMO Dividend Fund  
 BMO Emerging Markets Bond Fund  
 BMO Emerging Markets Fund  
 BMO Enterprise Fund  
 BMO Equity Growth ETF Portfolio  
 BMO Equity Growth ETF Portfolio Class  
 BMO European Fund  
 BMO Fixed Income ETF Portfolio  
 BMO Floating Rate Income Fund  
 BMO FundSelect® Balanced Portfolio  
 BMO FundSelect® Equity Growth Portfolio  
 BMO FundSelect® Growth Portfolio  
 BMO FundSelect® Income Portfolio  
 BMO Global Balanced Fund  
 BMO Global Dividend Class  
 BMO Global Dividend Fund  
 BMO Global Energy Class  
 BMO Global Equity Class  
 BMO Global Equity Fund  
 BMO Global Growth & Income Fund  
 BMO Global Infrastructure Fund  
 BMO Global Low Volatility ETF Class  
 BMO Global Monthly Income Fund  
 BMO Global Multi-Sector Bond Fund  
 BMO Global Small Cap Fund  
 BMO Global Strategic Bond Fund  
 BMO Greater China Class  
 BMO Growth & Income Fund  
 BMO Growth ETF Portfolio  
 BMO Growth ETF Portfolio Class  
 BMO Growth Opportunities Fund  
 BMO Income ETF Portfolio  
 BMO Income ETF Portfolio Class  
 BMO International Equity ETF Fund  
 BMO International Equity Fund  
 BMO International Value Class  
 BMO International Value Fund  
 BMO Japan Fund  
 BMO LifeStage Plus 2022 Fund  
 BMO LifeStage Plus 2025 Fund  
 BMO LifeStage Plus 2026 Fund  
 BMO LifeStage Plus 2030 Fund  
 BMO Low Volatility Canadian Equity ETF Fund  
 BMO Low Volatility U.S. Equity ETF Fund  
 BMO Money Market Fund  
 BMO Monthly Dividend Fund Ltd.  
 BMO Monthly High Income Fund II  
 BMO Monthly Income Fund  
 BMO Mortgage and Short-Term Income Fund  
 BMO Multi-Factor Equity Fund  
 BMO North American Dividend Fund  
 BMO Precious Metals Fund  
 BMO Preferred Share Fund  
 BMO Resource Fund  
 BMO Retirement Balanced Portfolio  
 BMO Retirement Conservative Portfolio  
 BMO Retirement Income Portfolio  
 BMO Risk Reduction Equity Fund  
 BMO Risk Reduction Fixed Income Fund  
 BMO SelectClass® Balanced Portfolio  
 BMO SelectClass® Equity Growth Portfolio  
 BMO SelectClass® Growth Portfolio  
 BMO SelectClass® Income Portfolio  
 BMO SelectTrust® Balanced Portfolio  
 BMO SelectTrust® Conservative Portfolio  
 BMO SelectTrust® Equity Growth Portfolio  
 BMO SelectTrust® Fixed Income Portfolio  
 BMO SelectTrust® Growth Portfolio  
 BMO SelectTrust® Income Portfolio  
 BMO SIA Focused Canadian Equity Fund  
 BMO SIA Focused North American Equity Fund  
 BMO Sustainable Balanced Portfolio (formerly BMO Principle Balanced Portfolio)  
 BMO Sustainable Conservative Portfolio (formerly BMO Principle Conservative Portfolio)  
 BMO Sustainable Growth Portfolio (formerly BMO Principle Growth Portfolio)  
 BMO Sustainable Income Portfolio (formerly BMO Principle Income Portfolio)  
 BMO Sustainable Opportunities Canadian Equity Fund  
 BMO Sustainable Opportunities Global Equity Fund (formerly BMO Fossil Fuel Free Fund)  
 BMO Tactical Balanced ETF Fund  
 BMO Tactical Dividend ETF Fund  
 BMO Tactical Global Asset Allocation ETF Fund  
 BMO Tactical Global Bond ETF Fund  
 BMO Tactical Global Equity ETF Fund  
 BMO Tactical Global Growth ETF Fund  
 BMO Target Education 2025 Portfolio  
 BMO Target Education 2030 Portfolio  
 BMO Target Education 2035 Portfolio  
 BMO Target Education 2040 Portfolio  
 BMO Target Education Income Portfolio  
 BMO U.S. Dividend Fund  
 BMO U.S. Dollar Balanced Fund  
 BMO U.S. Dollar Dividend Fund  
 BMO U.S. Dollar Equity Index Fund  
 BMO U.S. Dollar Money Market Fund  
 BMO U.S. Dollar Monthly Income Fund  
 BMO U.S. Equity Class  
 BMO U.S. Equity ETF Fund  
 BMO U.S. Equity Fund  
 BMO U.S. Equity Plus Fund  
 BMO U.S. High Yield Bond Fund  
 BMO U.S. Small Cap Fund  
 BMO USD Balanced ETF Portfolio  
 BMO USD Conservative ETF Portfolio  
 BMO USD Income ETF Portfolio  
 BMO Women in Leadership Fund  
 BMO World Bond Fund