



Product/Area	Commitment																				
<b>Mortgage Lending Quantitative Goals</b>	<p><b>Approx. 26% Increase in lending to LMI borrowers, LMI communities, and communities of color, valued at \$5.1 Billion</b></p> <p><b>12,432 unique CRA qualified mortgage Home Purchase and Home Improvement originations:</b></p> <p>Home Purchase and Home Improvement Goals</p> <table border="0"> <thead> <tr> <th></th> <th style="text-align: right;"><u>2023-2027 Target</u></th> </tr> </thead> <tbody> <tr> <td>Borrowers of Color<sup>1</sup></td> <td style="text-align: right;">6,523</td> </tr> <tr> <td>Low-to-Moderate Income Borrowers</td> <td style="text-align: right;">1,464</td> </tr> <tr> <td>Low-to-Moderate Income Census Tracts</td> <td style="text-align: right;">3,478</td> </tr> <tr> <td>Majority-Minority Census Tracts</td> <td style="text-align: right;">9,412</td> </tr> </tbody> </table> <p><b>12,998 unique CRA qualified mortgage refinancing originations:</b></p> <table border="0"> <thead> <tr> <th></th> <th style="text-align: right;"><u>2023-2027 Target</u></th> </tr> </thead> <tbody> <tr> <td>Borrowers of Color<sup>2</sup></td> <td style="text-align: right;">7,257</td> </tr> <tr> <td>Low-to-Moderate Income Borrowers</td> <td style="text-align: right;">3,267</td> </tr> <tr> <td>Low-to-Moderate Income Census Tracts</td> <td style="text-align: right;">3,210</td> </tr> <tr> <td>Majority-Minority Census Tracts</td> <td style="text-align: right;">9,567</td> </tr> </tbody> </table> <ul style="list-style-type: none"> <li>• <b>\$125 million for a Special Purpose Credit Program and allocation of \$125 million to increase homeownership among BIPOC individuals in San Jose and San Francisco</b></li> <li>• <b>Commitment to increase lending to all sub/disaggregated racial groups as reported in HMDA (Black, Asian, Latinx, Native American, and disaggregated Asian American and Hawaiian/ or Pacific Islander). If no increase after two years, agreement to meet with community representatives to find solutions to increasing mortgage goals for a specific group</b></li> <li>• <b>Commit to assist in origination of at least 125 mortgages on Tribal Trust Land over a period of 3 years</b></li> <li>• Will use a mortgage volume index to adjust mortgage goals relative to changing interest rates and market conditions</li> </ul>		<u>2023-2027 Target</u>	Borrowers of Color <sup>1</sup>	6,523	Low-to-Moderate Income Borrowers	1,464	Low-to-Moderate Income Census Tracts	3,478	Majority-Minority Census Tracts	9,412		<u>2023-2027 Target</u>	Borrowers of Color <sup>2</sup>	7,257	Low-to-Moderate Income Borrowers	3,267	Low-to-Moderate Income Census Tracts	3,210	Majority-Minority Census Tracts	9,567
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<sup>2</sup> Subgoals for specific demographics may have overlap across multiple categories and therefore will not add up to the goal of 12,998 unique originations.



<p><b>Mortgage Lending Qualitative Goals</b></p>	<ul style="list-style-type: none"> <li>• Will partner with, and expand its network of, non-profits, urban leagues and CDFIs to provide training, financial education and resources to mortgage loan applicants. BMO Harris will also partner with CDFIs to increase access to affordable mortgage loans</li> <li>• Offer financial education and literacy classes in partnership with key community partners (non-profits, housing agencies, and local realtors)</li> <li>• Increase partnership efforts with housing counseling organizations</li> <li>• Within first year, evaluate the possibility and develop a formal plan to support shared equity models of homeownership (community land trusts, co-ops) through product development, seed money, and capacity building</li> <li>• Within first year of plan, will evaluate feasibility of participation in HUD Section 184 Indian Home Loan Guarantee Program, the USDA RD 502 and the VA Direct Loan</li> <li>• Continue existing BMO foreclosure prevention/loss mitigation strategies, including participation in Homeowner’s Assistance Fund and California Mortgage Relief program.</li> <li>• BMO Harris will finalize anti-displacement guidance with respect to single family rental financing, including provisions on enhanced due diligence to assess and mitigate social and ethical concerns related to potential transactions. BMO Harris commits to being unreceptive to clients whose activities include wrongful evictions, single family property flipping, poorly managed properties, and other problematic behavior.</li> </ul>
<p><b>Small Business Lending Numeric Goals</b></p>	<p><b>\$16.5 billion</b> nationally, including at least <b>\$5.3 billion</b> in CA over five years; representing approximately a 7-8% increase over baseline performance using 2019 and 2021 lending data.</p> <p>CA Goals:</p> <ul style="list-style-type: none"> <li>• \$2.4 billion in lending to businesses with up to \$1 million in gross annual revenue;</li> <li>• \$1.9 billion in lending to businesses in LMI census tracts; and</li> <li>• \$4.4 billion in majority-minority census tracts</li> <li>• Will target originating 50% of its CRA-eligible small business loan units to companies with gross revenues of \$1 million or less</li> <li>• BHB will target originating 50% of its CRA-eligible small business loan units for loan sizes of \$150,000 or less</li> </ul>
<p><b>Small Business Qualitative Goal Highlights</b></p>	<ul style="list-style-type: none"> <li>• Will expand network of non-profits, urban leagues and CDFIs to provide training, financial education and resources to small business applicants, and to develop referral relationships</li> </ul>



	<ul style="list-style-type: none"> <li>• <b>Nationwide commitment of \$200 million for Special Purpose Credit Programs for Black &amp; Latinx and women-owned small businesses.</b> Will expand to Native American-owned businesses; will evaluate possibility of expanding program to underserved disaggregated AAPI subgroups</li> <li>• Will evaluate participation in BIA Indian Loan Guarantee and Insurance Program, state Small Business Credit Initiatives programs and California state-guarantee loan program</li> <li>• Will explore development of a product to help small business owners purchase their building as a wealth building and anti-displacement measure</li> </ul>
<p><b>CDLI Numeric Goals</b></p>	<p><b>\$5.7 Billion in CDLI for CA</b></p> <ul style="list-style-type: none"> <li>• \$4.2 Billion for CD Lending <ul style="list-style-type: none"> <li>○ \$400 million for government, non-profit, and middle market lending for infrastructure buildout, broadband and digital equity initiatives, etc.</li> </ul> </li> <li>• \$1.5 Billion for CD Investments <ul style="list-style-type: none"> <li>○ \$750 million targeted to affordable housing and LIHTC</li> </ul> </li> <li>• \$300 million of flexible capital to use for either CD lending or Investment</li> </ul>
<p><b>CDLI Highlights</b></p>	<ul style="list-style-type: none"> <li>• <b>\$60 million CA allocation of Community Impact Fund</b> to provide funding and financing such New Market Tax Credits and EQ2 funding to community development entities, other CD borrowers</li> <li>• Will target \$150 million of CD investments to funds or CDFI's led by women or people of color, nationally</li> <li>• Will evaluate the possibility of a SPCP for funds and/or non-profit developers led by women or people of color</li> <li>• \$3 million national Native Community Housing Fund to be used by Native CDFI's or other Native-led non-profits to fund down payment and closing cost assistance for originations on tribal land</li> </ul>
<p><b>CRA Eligible Philanthropy</b></p>	<p><b>\$50 Million in philanthropy for California</b></p> <ul style="list-style-type: none"> <li>• Commits to at least 10 new philanthropic partnerships in CA by end of plan</li> <li>• Will work to increase the average size of CRA-qualified grants from an average of approximately \$32,000 to an average of \$40,000-50,000 by the end of the Plan Period.</li> <li>• <b>\$7 million in CA, and \$3 million specifically for rural communities nationally</b> over five years to support women, BIPOC-led and serving nonprofits working in housing counseling, housing preservation, legal aid and fair housing.</li> <li>• <b>\$1.5 million</b> for technical assistance, capacity-building for CDFI's led and serving women and people of color</li> </ul>



	<ul style="list-style-type: none"> <li>• <b>\$5 million national commitment for Native-led organizations and/or initiatives</b>, such as those supporting small businesses, affordable homeownership, access to broadband, etc.</li> <li>• Will strive to provide grants to nonprofits that offer culturally and/or linguistically appropriate products and services to limited English proficient populations.</li> </ul>
<p><b>Retail</b></p>	<ul style="list-style-type: none"> <li>• BMO announced that it is eliminating both non-sufficient funds (“NSF”) and overdraft transfer fees and significantly reducing overdraft fees.</li> <li>• Continue offering Bank On certified checking account</li> <li>• Will provide financial literacy classes and educations about financial products in multiple languages to help reach unbanked and underbanked limited English proficient populations.</li> <li>• Exploring automated solutions for linguistic access</li> </ul>
<p><b>Branches and staffing</b></p>	<ul style="list-style-type: none"> <li>• <b>No closures for 3 years; no closures in LMI communities or communities of color for plan period</b></li> <li>• <b>Commitment to open 5 new branches or financial services offices</b> in LMI or majority minority tracts in CA, at least two full-service <ul style="list-style-type: none"> <li>○ Financial Services Offices typically involve a partnership with a local and established community group to build a BMO office within their space. These offices are staffed with a banker and/or mortgage specialist and provide day-to-day banking services with a full-service ATM that provides 24/7 access, when possible</li> </ul> </li> </ul>
<p><b>Staffing and Workforce Diversity</b></p>	<ul style="list-style-type: none"> <li>• Will double the number of CRA mortgage bankers serving LMI communities and communities of color</li> <li>• Will double branch ambassador network</li> <li>• Will increase CRA relationship managers by 50% to ensure adequate service in expanded footprint</li> <li>• Will strive to recruit and hire bilingual employees who speak languages relevant to branches’ neighborhoods</li> <li>• Plans to retain front-line workers and will increase minimum base pay from \$18 to \$20 an hour</li> <li>• Goal for at least 30% of BMO US senior leadership to be BIPOC; 40 – 60% to be women</li> <li>• Will begin annually disclosing EEO-1 employment data</li> </ul>
<p><b>Supplier Diversity</b></p>	<ul style="list-style-type: none"> <li>• Plans to grow its enterprise-wide diverse spend by 40% by end of plan period</li> <li>• Will strengthen granular reporting and impact analysis capabilities over coming years</li> </ul>



<p><b>CBA Governance and Accountability</b></p>	<ul style="list-style-type: none"> <li>• Will form a Community Advisory Council with 12 representatives and convene semiannually to review and discuss Plan’s progress.</li> <li>• Will work with the CAC, NCRC, and CRC to develop a reporting progress format</li> <li>• As a part of the CAC, the bank will form a Native Land Advisory Group</li> <li>• Will form a special working group to evaluate and respond to the needs of Black, Latinx, Indigenous, Asian American/Pacific Islanders</li> <li>• Will form a special working group to evaluate and respond to the affordable housing needs of rural, low income and communities of color within the footprint including issues surrounding community land trusts and the need for rehabilitation.</li> <li>• Implemented the Finance Against Slavery and Trafficking (FAST) framework; will report annually on progress in meeting FAST goals</li> </ul>
<p><b>Environmental Stewardship</b></p>	<ul style="list-style-type: none"> <li>• Will quantify and disclose scope 3 category 15 financed emissions, supply chain initiatives</li> <li>• Will seek input from NCRC, CRC, other relevant organizations and community groups to refine climate disclosures and practices</li> <li>• Community Impact Fund will support climate resiliency initiatives</li> </ul>