## Supplement to Annual Funding Notice

of

## BMO U.S. Pension Plan (PLAN)

for

## Plan Year Beginning January 1, 2024 and Ending December 31, 2024 (Plan Year)

This is a temporary supplement to your annual funding notice which is required by the Moving Ahead for Progress in the 21st Century Act, the Highway and Transportation Funding Act of 2014, the Bipartisan Budget Act of 2015, the American Rescue Plan Act of 2021, and the Infrastructure Investment and Jobs Act of 2021. These federal laws changed how pension plans calculate their liabilities. The purpose of this supplement is to show you the effect of these changes.

Prior to 2012, pension plans determined their liabilities using a two-year average of interest rates. Now pension plans also must take into account a 25-year average of interest rates. This means that interest rates likely will be higher and plan liabilities lower than they were under prior law. As a result, your employer may contribute less money to the plan at a time when market interest rates are at or near historical lows.

The "Information Table" compares the impact of using interest rates based on the 25-year average (the "adjusted interest rates") and interest rates based on a two-year average on the Plan's: (1) Funding Target Attainment Percentage, (2) Funding Shortfall, and (3) Minimum Required Contribution. The funding target attainment percentage is a measure of how well the plan is funded on a particular date. The funding shortfall is the amount by which liabilities exceed net plan assets. The minimum required contribution is the amount of money an employer is required by law to contribute to a plan in a given year. The following table shows this information determined with and without the adjusted interest rates. The information is provided for the Plan Year and for each of the two preceding plan years, if applicable.

	2024		2023		2022	
	With Adjusted Interest Rates	Without Adjusted Interest Rates	With Adjusted Interest Rates	Without Adjusted Interest Rates	With Adjusted Interest Rates	Without Adjusted Interest Rates
Funding Target Attainment Percentage	100.74%	95.65%	101.41%	81.38%	118.56%	87.97%
Funding Shortfall	\$0	\$52,739,330	\$0	\$191,028,247	\$0	\$131,596,199
Minimum Required Contribution	\$0	\$8,918,333	\$0	\$24,368,053	\$0	\$17,841,122

## **Information Table**

# Notice of Estimate Availability

This information is being provided as a requirement of the Pension Protection Act of 2006 (PPA). You continue to have the right to request a statement of your benefit in paper once in any 12-month period. This statement will be provided to you free of charge.

Contact the **Human Resources Centre** (HRC) with Pension or Supplemental Plan questions at **1-888-927-7700** and say *Pension*.

#### Workday – your online pension benefits resource

The **My Benefits and Retirement** site is available from Workday for current employees and offers online capabilities, with access to information about the BMO U.S. Pension Plan.

#### From the My Benefits and Retirement site you can...

- project a detailed pension calculation,
- compare my various pension payment options,
- initiate payment of my pension benefit at retirement, or
- **update** your beneficiary designation.

#### To access and use the My Benefits and Retirement website features:

- Open Workday
- **Select** the "My Benefits and Retirement" application
- Select the option of "on-network" or "off-network" access
- Select the "Project Your Retirement Income" tile to navigate to the screen pictured below
- Enter the requested information and click "Project Pension Benefit" to run your pension estimate

## ANNUAL FUNDING NOTICE For BMO U.S. Pension Plan

## Introduction

This notice provides key details about your pension plan (the "Plan") for the plan year beginning January 1, 2024 and ending December 31, 2024 (the "Plan Year").

## This is an informational notice. You do not need to respond or take any action.

This notice includes:

- Information about your Plan's funding status.
- Details on your benefit payments guaranteed by the Pension Benefit Guaranty Corporation (PBGC), a federal insurance agency.

## What if I have questions about this notice or my Plan?

Contact your plan administrator at:

- Alight Solutions Human Resources Centre (HRC)
- **Phone:** 1-888-927-7700
- Address: Human Resources Centre DEPT 09282 PO Box 299090 Lewisville, TX 75029-90904

To better assist you, provide your plan administrator with the following information when you contact them:

- Plan Number: 002
- Plan Sponsor Name: BMO Financial Corp.
- Employer Identification Number: 51-0275712.

## What if I have questions about PBGC and the pension insurance program guarantees?

Visit <u>www.pbgc.gov/generalfaqs</u> for more information. For specific information about your pension plan or pension benefits, you should contact your employer or plan administrator as PBGC does not have that information.

Federal law requires all traditional pension plans, also known as defined benefit pension plans, to provide this notice every year regardless of funding status. This notice does not mean your Plan is terminating.

## How Well Funded Is Your Plan

The law requires the plan administrator to explain how well the Plan is funded, using a measure called the "funded percentage." The funded percentage is calculated by dividing Plan assets by Plan liabilities. In general, the higher the funded percentage, the better funded the plan. Plan liabilities are the present value of the benefits promised by the Plan, determined using a market-related interest assumption. The chart below shows the Plan's funded percentage for the Plan Year and the two preceding plan years. It also lists the value of the Plan's assets and liabilities for those years. Plan liabilities for the 2024 Plan Year in Line 3 of the chart reflect the plan administrator's reasonable, good faith estimate.

		2024	2023	2022
1.	Last day of relevant plan year	December 31	December 31	December 31
2.	Plan assets	\$1,144,301,022	\$1,215,859,266	\$842,955,270
3.	Plan liabilities	\$1,112,588,991	\$1,148,133,946	\$845,778,618
4.	Funded percentage (Line 2 ÷ Line 3)	103%	106%	100%

## **Funded Percentage**

If the Plan terminates, the Plan's liabilities calculated by PBGC may be greater than the Plan liabilities shown in the above chart. When PBGC takes over a terminated plan as trustee, it guarantees benefits up to a legal limit. See the section of this notice titled "Benefit Payments Guaranteed by PBGC" for additional information.

## **Participant and Beneficiary Information**

The following chart shows the number of participants and beneficiaries covered by the Plan on the last day of the Plan Year and the two preceding years. The numbers for the 2024 Plan Year reflect the plan administrator's reasonable, good faith estimate.

Number of participants and beneficiaries on last day of relevant plan year		2024	2023	2022
1.	Last day of relevant plan year	December 31	December 31	December 31
2.	Participants currently employed	6,270	6,469	5,727
3.	Participants and beneficiaries receiving benefits	4,303	4,303	1,623
4.	Participants and beneficiaries entitled to future benefits (but not receiving benefits)	7,625	8,027	4,208
5.	Total Number of covered participants and beneficiaries (Lines 2 + 3 + 4 = 5)	18,198	18,799	11,558

## **Funding & Investment Policies**

## **Funding Policy**

Every pension plan must establish a funding policy to meet its objectives. The funding policy relates to how much money is needed to pay promised benefits. The Plan's funding policy is to contribute the ERISA minimum required contribution, plus an added contribution as necessary to avoid benefit restrictions on payment of lump sum distributions to plan participants. Additional contributions are determined based on such factors as current benefit obligations, actual return on plan assets and the current funded position.

## **Investment Policy**

Pension plans also have investment policies that provide guidelines for making investment management decisions. The Plan's investment policy is a target allocation of 12.0% developed global equities and 88.0% investment grade bonds with a policy range of +/- 2.5% from target.

As of the end of the Plan Year, the Plan's assets were allocated among the following investment categories as percentages of total assets:

Asset Allocation	Percentage
Public equity	15.1%
Private equity	0.0%
Investment grade debt instruments	82.4%
High-yield debt instruments	0.0%
Cash and cash equivalents	2.5%
Real Estate	0.0%
Other	0.0%

The average return on assets for the Plan Year was 1.40%.

## **Right to Request a Copy of the Annual Report**

Pension plans must file an annual report, called the **Form 5500**, with the U.S. Department of Labor. The Form 5500 includes financial and other information about these pension plans.

You can get a copy of your Plan's Form 5500:

- **Online:** Visit <u>www.efast.dol.gov</u> to search for your plan's Form 5500, or you may view a copy online at <u>https://bmousbenefits.com</u>.
- By Mail: Submit a written request to your plan administrator.
- **By Phone:** Call (202) 693-8673 to speak with a representative of the U.S. Department of Labor, Employee Benefits Security Administration's Public Disclosure Room.

The Form 5500 does not include personal information, such as your accrued benefits. For details about your accrued benefits, contact your plan administrator.

## **Termination Rules for Single-Employer Plans**

Federal law outlines specific rules for terminating a pension plan. There are three types of terminations:

#### **Standard Termination**

An employer can end a plan through a standard termination. However, the plan administrator must prove to PBGC that the plan has enough money to pay all benefits owed to participants.

Under a standard termination, the plan must provide your benefits through one of the following methods:

- **Periodic benefits:** The plan buys an annuity from an insurance company, ensuring you receive regular, generally monthly, retirement payments for life. Before purchasing the annuity, your plan administrator will notify you about the selected insurance company.
- **Lump-sum payment:** If the plan allows, you may elect a lump-sum payment that covers your entire benefit.

PBGC's guarantee ends once an annuity is purchased, or a lump-sum is paid. If the insurance company providing the annuity becomes unable to pay your benefits, the applicable state guaranty association will step in, guaranteeing the annuity to the extent authorized by state law.

## **Distress Termination**

If a plan is not fully funded, the employer may apply for a distress termination. The employer must demonstrate financial distress and prove to either a bankruptcy court or PBGC that the employer's business cannot survive unless the plan is terminated. If approved for a distress termination, PBGC will manage the plan as trustee, allocate the plan's assets based on statutory priority categories, and pay guaranteed benefits up to the legal limits, using the plan's assets and PBGC guarantee funds.

#### **Involuntary Termination**

PBGC can terminate a plan on its own in certain situations, such as to protect plan participants or PBGC's insurance program. In these cases, PBGC is appointed trustee and assumes responsibility for the plan.

Learn more about single-employer plan terminations in PBGC's Pension Plan Termination Fact Sheet at <u>https://www.pbgc.gov/about/factsheets/page/termination</u>.

## Benefit Payments Guaranteed by PBGC

When PBGC takes over a single-employer plan, it pays pension benefits through its insurance program. Only vested benefits – those you've earned and cannot forfeit – are guaranteed. Most participants and beneficiaries receive their full pension benefits, but some people may lose some, or all, non-guaranteed benefits.

#### What PBGC Guarantees

PBGC guarantees the following "basic benefits" up to limits set by law:

- Pension benefits at normal retirement age.
- Most early retirement benefits.
- Annuity benefits for survivors of plan participants.
- Disability benefits for disabilities that occurred before the earlier of the date the plan terminated or the sponsor's bankruptcy date.

#### What PBGC Does Not Guarantee

PBGC does not guarantee certain types of benefits, including:

- Non-vested benefits, which depend on meeting specific age, service, or other eligibility requirements.
- Benefit increases and new benefits in place for less than one year before a plan's termination date, while those in place for less than five years are only partly covered.
- Early retirement payments that exceed normal retirement payments, such as supplemental benefits that end when you become eligible for Social Security.
- Non-pension benefits, such as health insurance, life insurance, death benefits, vacation pay, or severance pay.
- Lump-sum payments exceeding \$7,000.

#### **Determining Guarantee Amounts**

The amount PBGC guarantees is determined as of the plan's termination date. If the plan terminates during the plan sponsor's bankruptcy, the guarantee amount is determined as of the date the sponsor entered bankruptcy.

The maximum benefit PBGC guarantees is set by law and updated annually. Participants and beneficiaries may receive benefits above the PBGC guaranteed amount, but only if the plan has enough funds to pay them.

For a plan with a termination date or sponsor bankruptcy date, as applicable in 2025, the maximum guarantee is \$7,431.82 per month, or \$89,181.84 per year, for a benefit paid to a 65-year-old retiree with no survivor benefit. If a plan terminates during a plan sponsor's bankruptcy, the maximum guarantee is fixed as of the calendar year in which the sponsor entered bankruptcy.

If benefits begin:

- Before age 65, the maximum guarantee is lower, reflecting the longer expected payment period for younger retirees.
- After age 65, the maximum guarantee is higher.

The guaranteed amount is reduced if a benefit will be paid to a survivor upon the participant's death. Maximum guarantee amounts by age can be found on the PBGC's website, <u>https://www.pbgc.gov/wr/benefits/guaranteed-benefits/maximum-guarantee</u>.

In determining whether the plan has enough assets to pay benefits above the guaranteed amount, PBGC uses different assumptions than those used to calculate the funded percentage shown in the "**How Well Funded Is Your Plan?**" section of this notice. As a result, the additional benefits participants receive may not align with the Plan's reported funded percentage. For example, a plan that reports 80 percent funding based on its own calculations does not mean its participants will receive 80 percent of their vested benefits.