

BANK OF AMERICA CORPORATION

2019 Sustainability Accounting Standards Board (SASB) Index

SASB Index

This Index reflects our report in accordance with Industry Standards Version 2018-10 issued by the Sustainability Accounting Standards Board (SASB). Our disclosures under those standards are based on the five SICS industries within the Financials sector that are most closely aligned with our mix of businesses: Asset Management & Custody Activities (FN-AC), Commercial Banks (FN-CB), Consumer Finance (FN-CF), Investment Banking & Brokerage (FN-IB) and Mortgage Finance (FN-MF). Unless otherwise noted, all data and descriptions are reported for Bank of America Corporation on a consolidated basis where applicable, and not just the businesses or segments relevant to the particular industry. We do not currently disclose all metrics included in the standards for these five SICS industries, but will continue to evaluate them in the future. Our commitment is to provide investors with useful, relevant and meaningful sustainability information and we may evolve our disclosures on these SASB topics over time. All reported data is as of and for the year ended December 31, 2019, unless otherwise noted.

Sustainability Accounting Metrics				
Industry	Accounting Metric	Category	Code	Response
Topic: Data Security				
CB, CF	Description of approach to identifying and addressing data security risks	Discussion and Analysis	FN-CB-230a.2 FN-CF-230a.3	Refer to Information Security and Privacy Policies found on the Governance page within the What Guides Us section of our corporate website and the Risk Factors: Business Operations section on pages 11-14 of the 2019 10-K for detail on our approach to data security risks.
Topic: Financial Inclusion & Capacity Building				
CB	(1) Number and (2) amount of loans outstanding qualified to programs designed to promote small business and community development	Quantitative	FN-CB-240a.1	Refer to page 6 of our 2019 Environmental, Social, and Governance (ESG) Performance Data Summary .
CB	Number of no-cost retail checking accounts provided to previously unbanked or underbanked customers	Quantitative	FN-CB-240a.3	Refer to page 7 of our 2019 ESG Performance Data Summary for our disclosure of the number of Advantage SafeBalance Checking accounts. The Advantage SafeBalance checking account program is a low-cost deposit service provided to our customers. Students under age 24 are eligible for a waiver of the monthly maintenance fee. Additionally, no overdraft fees are assessed for this service.
CB	Number of participants in financial literacy initiatives for unbanked, underbanked, or underserved customers	Quantitative	FN-CB-240a.4	We provide financial literacy to all of our customers through the Better Money Habits financial education platform. Better Money Habits is a resource that helps individuals and families build know-how on topics ranging from budgeting and saving to home ownership and retirement – designed for the way people want to learn today.
Topic: Incorporation of Environmental, Social, and Governance Factors in Credit Analysis				
CB	Commercial and industrial credit exposure, by industry	Quantitative	FN-CB-410a.1	Refer to the Industry Concentrations subsection on pages 64-65 of the 2019 10-K for further details.
AC, CB, IB	Description of approach to incorporation of environmental, social, and governance (ESG) factors in credit analysis, in investment banking and brokerage activities and in wealth management processes and strategies	Discussion and Analysis	FN-CB-410a.2 FN-IB-410a.3 FN-AC-410a.2	Refer to the Bank of America Corporation Environmental and Social Risk Policy Framework for details on our approach to incorporating ESG factors into our risk management activities.

Industry	Accounting Metric	Category	Code	Response
IB	(1) Number and (2) total value of investments and loans incorporating integration of environmental, social, and governance (ESG) factors, by industry	Quantitative	FN-IB-410a.2	Refer to pages 5-8 of the 2019 ESG Performance Data Summary for detail on our investment in Economic and Social Progress and Environmental Sustainability.
AC	Amount of assets under management, by asset class, that employ (1) integration of environmental, social, and governance (ESG) issues, (2) sustainability themed investing, and (3) screening	Quantitative	FN-AC-410a.1	As of December 31, 2019, Bank of America had \$25.11 billion of client balances in Sustainable & Impact Investments which we define as investment strategies that intentionally integrate environmental, social or governance factors in order to avoid harm by reducing negative social or environmental effects or managing risk by limiting certain exposures, benefit stakeholders by supporting positive social or environmental practices, or contribute to solutions that address specific and measurable sustainability outcomes or impact.
AC	Description of proxy voting and investee engagement policies and procedures	Discussion and Analysis	FN-AC-410a.3	<p>Merrill Lynch and Merrill Private Wealth Management clients enrolled in our investment advisory programs directly determine how to vote their proxies. Through our investment advisory agreement, clients may delegate proxy voting authority directly to institutional shareholder services (ISS) or elect to vote proxies themselves. As part of delegating to ISS, clients may, at their discretion, choose among the ISS Benchmark, ISS Socially Responsible Investing, and ISS Catholic proxy voting guidelines.</p> <p>Managed Account Advisors (MAA) and Merrill Lynch, Pierce, Fenner & Smith (MLPF&S) perform due diligence on ISS to determine that it has the capacity and competency to adequately analyze proxy issues and can make such voting recommendations in an impartial manner and in the best interests of clients.</p> <p>For matters over which ISS has a conflict or is otherwise unable to vote (called Specified Investments), the proxy committee of MAA or MLPF&S, as applicable, will have the authority to vote proxies in accordance with its proxy voting policies and procedures. MAA or MLPF&S does not assume proxy voting authority for securities except with respect to Specified Investments. For proxies neither covered by ISS nor included as Specified Investments, the client will retain the right to vote those proxies.</p> <p>Bank of America Private Bank clients delegate authority to the Private Bank to vote proxies on their behalf. The Private Bank has a fiduciary focused proxy voting policy and custom guidelines and employs Glass Lewis to execute the votes. Clients may also withhold this delegation and vote themselves if they choose to do so.</p>

Industry	Accounting Metric	Category	Code	Response
Topic: Business Ethics				
AC, CB, IB	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations	Quantitative	FN-CB-510a.1 FN-IB-510a.1 FN-AC-510a.1	For disclosure of material legal proceedings, refer to Note 13 on pages 129-134 of the 2019 10-K .
AC, CB, IB	Description of whistleblower policies and procedures	Discussion and Analysis	FN-CB-510a.2 FN-IB-510a.2 FN-AC-510a.2	Page 13 of our Code of Conduct outlines policies and procedures related to reporting ethical misconduct.
Topic: Systemic Risk Management				
CB, IB	Global Systemically Important Bank (G-SIB) score, by category	Quantitative	FN-CB-550a.1 FN-IB-550a.1	Our G-SIB buffer is 2.5%. Refer to the Regulatory Capital subsection on pages 46-48 of the 2019 10-K for further detail. Additionally, refer to our Banking Organization Systematic Risk Report FR Y-15 filing for further information that factors into our calculation.
CB, IB	Description of approach to incorporation of results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy, and other business activities	Discussion and Analysis	FN-CB-550a.2 FN-IB-550a.2	We conduct various scenario analyses, included as part of the Comprehensive Capital Analysis and Review (CCAR) and Dodd-Frank Act Stress Tests, as well as our resolution and recovery planning. For more information, see the Capital Management section on pages 45-50 of the 2019 10-K .
AC	Total exposure to securities financing transactions	Quantitative	FN-AC-550a.3	Refer to Note 11 on pages 126-128 of the 2019 10-K for our exposures to securities financing transactions. Additionally, refer to Note 13 on pages 129-134 for more on our commitments and contingencies.
AC	Net exposure to written credit derivatives	Quantitative	FN-AC-550a.4	Refer to Note 3 on pages 102-108 of the 2019 10-K which includes our exposures to written credit derivatives.
Topic: Employee Diversity & Inclusion				
AC, IB	Percentage of gender and racial/ethnic group representation for (1) executive management, (2) non-executive management, (3) professionals, and (4) all other employees	Quantitative	FN-IB-330a.1 FN-AC-330a.1	Refer to pages 4-5 of the 2019 ESG Performance Data Summary for details on employee diversity and inclusion metrics.

Industry	Accounting Metric	Category	Code	Response
Topic: Professional Integrity				
IB	Description of approach to ensuring professional integrity, including duty of care	Discussion and Analysis	FN-IB-510b.4	Refer to our Code of Conduct for further details on professional integrity. Additionally, refer to the What Guides Us section of the Corporation's website, in particular the Responsible Growth and our Business Practices sections.
IB	Total amount of monetary losses as a result of legal proceedings associated with professional integrity, including duty of care	Quantitative	FN-IB-510b.3	For disclosure of material legal proceedings, refer to Note 13 on pages 129-134 of the 2019 10-K .
Topic: Employee Incentives & Risk Taking				
IB	Percentage of total remuneration that is variable for Material Risk Takers (MRTs)	Quantitative	FN-IB-550b.1	Variable incentive remuneration awards (both annual and deferred) are subject to distinct features that can result in the awards being cancelled or prior payments being clawed back in the event of certain detrimental conduct or financial losses. We believe these features encourage appropriate behavior and manage risk in our compensation program. For individual Material Risk Takers in the Investment Bank & Brokerage sector, 100% of deferred variable compensation is subject to clawback. For compensation related to 2019, approximately 77% of total remuneration was variable, of which 65% was deferred and therefore subject to clawback.
IB	Percentage of variable remuneration of Material Risk Takers (MRTs) to which malus or clawback provisions were applied	Quantitative	FN-IB-550b.2	
IB	Discussion of policies around supervision, control, and validation of traders' pricing of Level 3 assets and liabilities	Discussion and Analysis	FN-IB-550b.3	Refer to the Complex Accounting Estimates section on pages 77-79 and Notes 1 and 21 of the 2019 10-K on pages 93-100 and 145-154.
Topic: Customer Privacy				
CF	Number of account holders whose information is used for secondary purposes	Quantitative	FN-CF-220a.1	Refer to the information security and privacy policies sections found on the Governance page within the What Guides Us section of our corporate website for detail on information security policies and the Risk Factors: Business Operations section on pages 11-14 of the 2019 10-K for detail on our approach to data security risks.
CF	Total amount of monetary losses as a result of legal proceedings associated with customer privacy	Quantitative	FN-CF-220a.2	For disclosure of material legal proceedings, refer to Note 13 on pages 129-134 of the 2019 10-K .

Industry	Accounting Metric	Category	Code	Response
Topic: Lending Practices				
MF	Total amount of monetary losses as a result of legal proceedings associated with communications to customers or remuneration of loan originators	Quantitative	FN-MF-270a.3	For disclosure of material legal proceedings, refer to Note 13 on pages 129-134 of the 2019 10-K .
MF	Description of remuneration structure of loan originators	Discussion and Analysis	FN-MF-270a.4	<p>Bank of America's compensation policies are governed through our Compensation Governance Policy, which is reviewed and approved by our Board of Directors' Compensation and Human Capital Committee. Compensation plans are comprised of an appropriate mix of salary, benefits and incentives paid over time that properly align employee and stockholder interests and align with our business strategy.</p> <p>Loan Originators are paid based on a combination of client care performance, loan production, loan quality and compliance.</p>
Topic: Selling Practices				
CF	Percentage of total remuneration for covered employees that is variable and linked to the amount of products and services sold	Quantitative	FN-CF-270a.1	Employees in financial centers are paid primarily in salary, with average incentive for employees in primary sales roles being approximately 10-15% of total remuneration. Incentives are tied to a balanced mix of relationship deepening (tied to demonstrated client usage), client care and operational excellence.
CF	Total amount of monetary losses as a result of legal proceedings associated with selling and servicing of products	Quantitative	FN-CF-270a.5	For disclosure of material legal proceedings, refer to Note 13 on pages 129-134 of the 2019 10-K .
Topic: Discriminatory Lending				
MF	Total amount of monetary losses as a result of legal proceedings associated with discriminatory mortgage lending	Quantitative	FN-MF-270b.2	For disclosure of material legal proceedings, refer to Note 13 on pages 129-134 of the 2019 10-K .
MF	Description of policies and procedures for ensuring nondiscriminatory mortgage origination	Discussion and Analysis	FN-MF-270b.3	Refer to pages 18-19 of the Bank of America Corporation Environmental and Social Risk Policy Framework for details of our fair lending practices.

Industry	Accounting Metric	Category	Code	Response
Topic: Environmental Risk to Mortgaged Properties				
MF	(1) Number and (2) value of mortgage loans in 100-year flood zones	Quantitative	FN-MF-450a.1	As of December 31, 2019, the Corporation had 53,341 loans with a book value of \$12.3 billion in 100-year flood zones according to the FEMA definition.
MF	(1) Total expected loss and (2) Loss Given Default (LGD) attributable to mortgage loan default and delinquency due to weather related natural catastrophes, by geographic region	Quantitative	FN-MF-450a.2	<p>The Corporation currently does not have a process in place to estimate losses specific to natural catastrophes. We have monitored natural disasters in the last few years and given our robust insurance requirements, client selection process and portfolio asset quality (borrower's equity), we have experienced no material losses. We understand this may change based on severity and location of future events. As such we are engaged with industry and stakeholder groups, are performing pilot studies and have ongoing internal working groups dedicated to developing methodologies and data systems that will provide valuable insight in this area.</p> <p>See the Physical Risk and Stress Testing sections of our Task Force on Climate related Financial Disclosures (TCFD) report for details on scenario analysis and stress testing related to the potential impact of climate-related natural hazards on our mortgage portfolio.</p>
MF	Description of how climate change and other environmental risks are incorporated into mortgage origination and underwriting	Qualitative	FN-MF-450a.3	For acute physical risk, which are event-driven extreme weather events such as cyclones, hurricanes, or floods, the Corporation follows Federal flood insurance regulations and the industry's mortgage hazard insurance (including fire/wind coverage) during underwriting. Flood insurance requirements are based on flood zones determined by the Federal Emergency Management Agency (FEMA). Insurance coverage amounts require replacement value of property with policy parameters following industry standards for minimum/maximum.
Topic: Transparent Information & Fair Advice for Customers				
AC	Total amount of monetary losses as a result of legal proceedings associated with marketing and communication of financial product related information to new and returning customers	Quantitative	FN-AC-270a.2	For disclosure of material legal proceedings, refer to Note 13 on pages 129-134 of the 2019 10-K .
AC	Description of approach to informing customers about products and services	Discussion and Analysis	FN-AC-270a.3	<p>Refer to the following Client Focus page within the What Guides Us section of our corporate website for the Corporation's approach to serving its clients. In addition, see the link to "What Can an Advisor Do for Me?" page that outlines our approach to serving clients in our Global Wealth & Investment Management business. This website includes links to important legal information available to our clients as well as fee schedules for products offered.</p> <p>Further, refer to our Business Standards Report that outlines our focus on making financial lives better and how, since the financial crisis, our company today is more straightforward, less risky, and built on a stronger foundation that lives up to our purpose.</p>

Activity Metrics:

CB	(1) Number and (2) value of checking and savings accounts by segment: (a) personal and (b) small business	Quantitative	FN-CB-000.A	At December 31, 2019, the Corporation had 53.4 million consumer checking and savings accounts with balances of \$691.8 billion. Additionally, we had 3.7 million small business checking and savings accounts with deposit balances of \$98.9 billion.
CB	(1) Number and (2) value of loans by segment: (a) personal, (b) small business, and (c) corporate	Quantitative	FN-CB-000.B	Refer to Note 5 on pages 112-120 of the 2019 10-K for disclosure of our Loans and Leases.
IB	(1) Number and (2) value of (a) underwriting, (b) advisory, and (c) securitization transactions	Quantitative	FN-IB-000.A	Refer to the Global Investment Banking section on page 38 of the 2019 10-K for disclosure of our Investment Banking activity and Note 7 on pages 121-124 of the 2019 10-K for disclosure of our securitization transactions.
IB	(1) Number and (2) value of market making transactions in (a) fixed income, (b) equity, (c) currency, (d) derivatives, and (e) commodity products	Quantitative	FN-IB-000.C	Refer to the Global Markets tables and discussion on pages 39 - 40, and the Sales and Trading Revenue table on page 106 of the 2019 10-K for disclosure of the financial results associated with the Corporation's market making transactions.
MF	(1) Number and (2) value of mortgages originated by category: (a) residential and (b) commercial	Quantitative	FN-MF-000.A	Refer to the Credit Quality Indicators subsection of Note 5 of the First Quarter 2020 10-Q for disclosure of 2019 residential and commercial real estate mortgage originations.
MF	(1) Number and (2) value of mortgages purchased by category: (a) residential and (b) commercial	Quantitative	FN-MF-000.B	The Corporation purchased \$2.4 billion of residential mortgage loans and \$7.8 million of commercial mortgage loans during 2019.
AC	(1) Total registered and (2) total unregistered assets under management (AUM)	Quantitative	FN-AC-000.A	Refer to the Corporation's Global Wealth & Investment Management Key Indicators and Metrics on page 36 of the 2019 10-K for our total Assets Under Management. Additionally, refer to the same table and the Client Balances subsection for further detail on the Corporation's client balances under management.
AC	Total assets under custody and supervision	Quantitative	FN-AC-000.B	Refer to the Corporation's Global Wealth & Investment Management Key Indicators and Metrics on page 36 of the 2019 10-K for our total Assets Under Management. Additionally, refer to the same table and the Client Balances subsection for further detail on the Corporation's client balances under management.