

BANK OF AMERICA CORPORATION

2021 Environmental, Social & Governance Performance Data Summary and Global Reporting Initiative Index

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Measuring Progress Against Our Environmental, Social, and Governance Goals

The Bank of America Environmental, Social, and Governance (ESG) approach is integrated into each of our eight lines of business and helps define how we pursue business opportunities and manage risk. In 2021, our longstanding commitment to racial equality*, a low-carbon transition and community support was reinforced by our Net Zero announcement and deployment of \$250 billion toward a \$1.5 trillion Sustainable Finance goal. In the following pages, we report progress towards our efforts to make our operations more sustainable, support our employees and invest in communities – increasing prosperity and resiliency and driving progress that addresses climate change.

This year we integrated our Global Reporting Initiative index (GRI) into this ESG Performance Data Summary report, and added alignment of various performance metrics to the United Nations' Sustainable Development Goals (SDGs). Refer to our [2021 Annual Report](#) for our second disclosure against the World Economic Forum International Business Council stakeholder capitalism metrics, and more information about our ESG commitments.

PEOPLE

PEOPLE	UNITS	2019	2020	2021
GRI 2-7: Employees	See 2021 Annual Report , Human Capital Management Update for workforce, gender, and diversity data.			
Employee volunteer hours	# in millions	2.1	1.1	1.6
Employee funds directed to communities through individual giving and matching gifts program	\$ USD in millions	77	65	72
Veterans, national guard and reservists hired	% total # total to date	11 10,109	6.68 10,983	12 12,658
GRI 401-1: New employee hires and employee turnover	See 2021 Annual Report , Human Capital Management update for new employee hires. We report new employee hires and turnover for the whole company.			
Training				
Diversity, inclusion and aspects of human rights total training hours	# hours	90,575	108,535	158,580
Unique employees and contractors trained on the enterprise Risk Framework, including information about the Bank of America Corporation Environmental and Social Risk Policy Framework (ESRPF)**	# trained	-	58,000	46,400
Voluntary completions of climate risk and sustainable investing training materials as part of new ESG, Climate and Sustainable Finance College (launched in 2021)	# completions	-	-	5,000
GRI 404-1: Average hours of training per year per employee	Our company. Business practices Working here. Being a great place to work. Recognizing and rewarding performance			
Employee Benefits and Health				
GRI 401-2: Benefits provided to full-time employees that are not provided to temporary or part-time employees	Working here. Being a great place to work. Wellness & benefits Working here. Being a great place to work. Recognizing and rewarding performance			
GRI 401-3: Parental leave	Working here. Being a great place to work. Wellness & benefits			

*This commitment increased to \$1.25 billion as of March 2021.

**The company has established an enterprise Risk Framework training, which is required for all employees and contractors and provides an in-depth overview of how we manage risk. This includes background on the types of risks we face and presents awareness on the different programs and processes we have in place to help mitigate these risks, including the ESRPF.

GRI 403-1: Occupational health and safety management system

See the Human Capital Management content in the [2021 Annual Report](#) (pages 38-41) for information on how Bank of America supports employee safety and health throughout the pandemic, and for examples of safety processes implemented based on CDC guidance. In addition, Bank of America's Enterprise Occupational Safety & Health Policy complies with relevant statutory requirements relating to health, safety and the physical environment, as they affect employees, suppliers, clients and the public. Bank of America Corporation is committed to providing a safe working environment for its employees, customers, third party suppliers and any others operating within Company premises or at the behest of the Company. a. Bank of America maintains a global safety program that aligns with applicable laws, rules and regulations and is supplemented by regional safety and health systems that support the Bank's policy. b. The Bank's Safety Program covers all employees, workplaces, and activities conducted on behalf of the Bank. The Bank's Safety Program incorporates the following statement: Safety is everyone's responsibility. Supporting workplace safety assures your own protection and the protection of other employees, customers, contractors/suppliers and the general public.

GRI 403-2: Hazard identification, risk assessment, and incident investigation

The Bank's Occupational Safety & Health Council advises on direction and changes of the Enterprise Occupational Safety & Health Policy. It reviews the safety and health metric dashboard and corresponding action plans quarterly in line with Policy objectives and resolves issues and risks that have been escalated. a. Objective of the Bank of America Safety Program is to provide a safe work environment and to identify, correct and eliminate workplace hazards. Employees may raise issues regarding workplace health or safety to the 24/7 security hotline. Additionally, workplace hazards should be reported to an appropriate member of management, the site safety coordinator (if applicable), Corporate Workplace (Facility Management) or anonymously through the Ethics and Compliance Hotline. b. Bank of America's Employee Handbook states the following: "All employees have the right to raise issues or file a workplace health or safety complaint without fear of retaliation. To anonymously report any complaints, contact the Ethics and Compliance Hotline..." Additionally, there are numerous Whistleblower Policies in place across the globe.

GRI 403-3: Occupational health services

See the [2021 Annual Report](#) (pages 38-41) for information on how Bank of America supports employee safety and health throughout the pandemic. In addition, the Bank ensures the availability of health services for all employees who require consultations and/or care related to a workplace hazard or incident, including dedicated Life Events Services or Employee Assistance Program resources as needed to facilitate a smooth transition back to work. Our Life Safety team facilitates the Occupational Safety & Health Council at an enterprise level, ensuring multiples lines of business work together to identify and minimize risk across their functions and our global footprint. Regionally-based security/safety managers proactively assess and mitigate many situational and physical risks while also responding to workplace safety concerns escalated through our numerous reporting channels (24/7 Security Hotline, See Something Say Something anonymous reporting, direct engagement, etc.). The Bank has further prioritized the safety and health of our employees in direct response to the coronavirus.

GRI 403-4: Worker participation, consultation, and communication on occupational health and safety

The Bank engages in a variety of consultation and communication activities dependent upon sizes of offices ranging from direct senior management face to face meetings through to health and safety committees and works councils at which employee representatives are attendees. The Bank's Occupational Safety & Health Council advises on direction and changes of the Enterprise Occupational Safety & Health Policy. It reviews the safety and health metric dashboard and corresponding action plans quarterly in line with Policy objectives and resolves issues and risks that have been escalated to the Council. See also the [Bank of America Annual Report](#) (page 38-41).

GRI 403-5: Worker training on occupational health and safety	Annual safety related enterprise training is required of all employees and is compliant with applicable laws, rules and regulations. Additionally, safety and health training is provided for specific work environment hazards/risks in accordance with laws, rules and regulations (i.e., Chemical Inventory and Material Safety Data Sheets and Powered Industrial Truck Operator Training Assessment and Asset Inventory). See also the Bank of America Annual Report (pages 38-41, 120) for information on well-being-related trainings and other expanded resources.
GRI 403-6: Promotion of worker health	Throughout 2021, we supported our employees as they adapted to the developing global health crisis. We expanded our health and wellness programs, increased benefits for child and adult care, provided flexible time off and offered free COVID-19 testing as well as vaccine clinics in some of our workspaces. Please refer to our Annual Report (pages 38-41) for additional worker health programs.
GRI 403-7: Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Where the Bank does not own the building, we manage safety and health risk through contractual agreements, and relationships with landlords and third party suppliers to identify and resolve unfavorable safety and health conditions in the workplace. Suppliers are bound by contract to adhere to Bank policies and standards while performing services for or on behalf of Bank of America and/or when on Bank premises. Customers, employees and visitors are required to adhere to all posted safety signage, including, but not limited to mask use and social distancing (compliance with which is monitored daily), no smoking, firearms prohibitions, etc. Also refer to our Annual Report (pages 38-41) for additional COVID response information.
GRI 403-8: Workers covered by an occupational health and safety management system	As mentioned previously, all employees are covered under the Bank's Enterprise Safety Program. The Bank has 212,505 employees and 53,414 non-employees for an Enterprise total of 265,919. Note non-employee number includes contractors, consultants, outsourced/access only and joint venture. Bank of America's Safety Program is subject to the Bank's internal Audit process as well as Federal OSHA and state and local safety and health agency inspections.
GRI 404-2: Programs for upgrading employee skills and transition assistance programs	Working here, Being a great place to work, Wellness & benefits Working here, Being a great place to work, Recognizing and rewarding performance
GRI 404-3: Percentage of employees receiving regular performance and career development reviews	Working here, Being a great place to work, Wellness & benefits Omission - Part of Disclosure Omitted: Percentage of employees receiving regular performance and career development reviews Reason for Omission: Not applicable. The percentage of completed reviews does not necessarily speak to our overall pay-for-performance methodology, and this detail has not been included in the past for ESG purposes.
GRI 405-1: Diversity of governance bodies and employees	Working here, Being a great place to work, Diversity & inclusion
GRI 405-2: Ratio of basic salary and remuneration of women to men	2022 Proxy Statement, 2021 Annual Report

PLANET: GOALS AND PERFORMANCE



GOAL (2010 BASELINE)	UNITS	2030 target	2019	2020	2021
Greenhouse Gases/Energy					
Maintain carbon neutrality for operations (Scope 1 and 2)	% reduction	Carbon Neutral	100%	100%	100%
Reduce location-based GHG emissions by 75% (Scope 1 and 2)	% reduction	75%	56%	61%	63%
Reduce energy use	% reduction	55%	42%	45%	47%
Purchase 100% zero carbon electricity	% renewable	100%	107%	109%	101%
Green Building					
LEED certification (or comparable) in owned and leased space	% certified	40%	25%	24%	25%
Water					
Reduce potable water use	% reduction	55%	45%	50%	53%
Waste (2011 Baseline)					
Divert construction and demolition waste from the landfill	% reduction	75%	63%	70%	73%
Dispose of electronic waste using certified responsible suppliers	% disposed	100%	100%	100%	100%
Paper					
Paper from certified sources	% from certified sources	100%	99.3%	99.3%	98.6%
Supplier Engagement					
Assessment of global suppliers, by current year spend, for ESG risks as outlined by the company's Vendor Code of Conduct	% of spend	90%	-	-	63%
Ensure global suppliers, by spend*, set GHG emissions reduction or renewable energy targets	% of spend	70%	44%	59%	61%
Sustainable Aviation Fuel (SAF)					
Mobilize Sustainable Finance investment for the production of SAF and other low-carbon aviation solutions*	\$ USD in billions	2	-	-	SAF goals are new and will begin reporting in 2023.
Support production and use of SAF	# of gallons in billions	1	N/A	N/A	
Utilize SAF for annual corporate and commercial jet fuel usage	% of jet fuel usage	20%	-	-	
Housing					

Goal: Help 60,000 LMI individuals and families achieve homeownership through the \$15 billion Bank of America Community Homeownership Commitment

*Assessed against previous year spend

Please see [Making an impact, Environmental sustainability](#) on www.bankofamerica.com to read more about our environmental efforts. More performance data is also listed below in the Planet section.

PRINCIPLES OF GOVERNANCE



GOVERNANCE	UNITS	2019	2020	2021
ESG Committee meetings held	# of meetings	6	7	9
National Community Advisory Council meetings held	# of meetings	2	3	4
Customers/prospects who participated in customer and client satisfaction surveys	# in millions	14.808	14.932	14.416
GRI 2-9: Governance structure and composition	Bank of America investor relations, Corporate governance, Management Team & Directors Bank of America investor relations, Corporate governance, Board committees			
GRI 2-10: Nomination and selection of the highest governance body	Our Board seeks directors whose complementary knowledge, experience, and skills provide a broad range of perspectives and leadership expertise in financial services and other global, highly complex and regulated industries, strategic planning and business development, business operations, marketing and distribution, technology/ cybersecurity, risk management and financial controls, human capital management, corporate governance, public policy, and other areas important to our company's strategy and oversight. Additional information is available in our 2022 Proxy Statement in the Corporate Governance Section.			
GRI 2-11: Chair of the highest governance body	Our company, Business practices Making an impact, Key governance topics Bank of America Investor Relations, Corporate Governance, Management Team & Directors 2022 Proxy Statement			
GRI 2-12: Role of the highest governance body in overseeing the management of impacts	Our company, Business practices; Making an impact, Key governance topics ESRPF 2022 Proxy Statement			
GRI 2-13: Delegation of responsibility for managing impacts	Our company, Business practices; Making an impact, Key governance topics			
GRI 2-14: Role of the highest governance body in sustainability reporting	Our company, Business practices; Making an impact, Key governance topics The Global ESG Committee reports to the Board-level Corporate Governance, Environment and Sustainability Committee. A new ESG Disclosure Committee was convened in Q1 2022 which is a sub-committee to the Global ESG Committee.			
Other				
GRI 2-15: Conflicts of interest	Bank of America's Code of Conduct guides all staff and management on conflicts of interest.			
GRI 2-16: Communication of critical concerns	Code of Conduct Our company, Business practices Making an impact, Key governance topics			
GRI 2-17: Collective knowledge of the highest governance body	Our company, Business practices Making an impact, Key governance topics			

GRI 2-18: Evaluation of the performance of the highest governance body	2022 Proxy Statement
GRI 2-19: Remuneration policies	2022 Proxy Statement , Compensation governance and risk management Working here, Being a great place to work, Recognizing and rewarding performance
GRI 2-20: Process to determine remuneration	2022 Proxy Statement , Compensation governance and risk management Working here, Being a great place to work, Recognizing and rewarding performance
GRI 2-21: Annual total compensation ratio	2022 Proxy Statement ; 2021 Annual Report
GRI 2-22: Statement on sustainable development strategy	2021 Annual Report , A letter from Chairman and CEO Brian Moynihan
GRI 2-23: Policy commitments	Our company, Business practices, responsible growth ; Vendor Code of Conduct ; Code of Conduct We apply the precautionary approach to identifying and addressing longer-term environmental issues that may impact our business, clients and communities, including global climate change. Our commitment to specific policies, industry best practices and collaboration with external experts helps to inform our risk assessments in this area.
GRI 2-24: Embedding policy commitments	Our company, Business practices, responsible growth , Vendor Code of Conduct ; Code of Conduct
GRI 2-25: Processes to remediate negative aspects	We encourage our employees and vendor employees to speak up, without retaliation, about any concerns they may have, including through our grievance channels. Through our Ethics and Compliance hotline, our employees and our vendor employees can report complaints or possible violations regarding ethical issues or other inappropriate activity, including adverse impacts on human rights. For additional information, see our Code of Conduct .
GRI 2-26: Mechanisms for seeking advice and raising concerns	Code of Conduct ; Making an impact, Key governance topics
GRI 2-27: Compliance with laws and regulations	Our 2021 Environmental operations data, Environmental Spend
GRI 2-28: Membership associations	Bank of America investor relations, Political Activities Archive
GRI 2-29: Approach to stakeholder engagement	Our company, business practices Making an impact, Key governance topics 2021 Annual Report
GRI 2-30: Collective bargaining agreements	Direct response: No U.S.-based employees are subject to collective bargaining agreements.
GRI 205-1: Operations assessed for risks	Business units are routinely analyzed for risks related to corruption.
GRI 205-2: Communication and training about anti-corruption policies and procedures	Bank of America employees are regularly trained in anti-corruption policies as part of our Code of Conduct training.

GRI 415-1: Political contributions [Bank of America investor relations, Political Activities Archive](#)

GRI 417-1: Requirements for product and service information and labeling [Our company, What we offer, Enabling financial health](#)

GRI 417-2: Incidents of non-compliance concerning product and service information and labeling We report material non-compliance incidents according to SEC standards.

GRI 417-3: Incidents of non-compliance concerning marketing communications We report material non-compliance incidents according to SEC standards.

GRI 418-1: Substantiated complaints concerning breaches of customer privacy and losses of [Our company, Business practices](#)
[Making an impact, Key governance topics](#)

PROSPERITY



	UNITS	2019	2020	2021
Women supported through ESG programs and partnerships (e.g. Cornell, Tory Burch Foundation, Cherie Blair, Kiva)*	# of women	19,000+	50,000+	75,000+
Countries represented by those enrolled in the Bank of America Institute for Women's Entrepreneurship at Cornell*	# of countries	65+	85	116
Philanthropic giving to support economic mobility	\$ USD in millions	250	350	370
Economic Opportunity for Communities of Color				
2021 equity investments and philanthropic commitments toward our five-year, \$1.25 billion racial equality and economic opportunity initiative:			\$450 USD in millions	
Organizations supported in communities of color**	# organizations	-	-	896
Minority-focused equity funds supported**	# funds	-	-	104
Minority Depository Institutions (MDIs) supported**	# institutions supported	-	-	22
Workforce development and education grants	\$ USD in millions	59	68	94
Community development grants	\$ USD in millions	52	62	87
Basic needs grants	# of women	46	125	81
Giving to support the arts	\$ USD in millions	36	50	52
Arts organizations supported	# of organizations	2,300	1,850	1750
Art conservation projects funded***	# of projects	22	-	23
Countries with funded art conservation projects***	# of countries	9	-	13
GRI: 203-1: Infrastructure investments and services supported				
Our company , What we offer , Enabling financial health ; Small business ; Homeownership				
Affordable housing units financed by Community Development Banking	# of units	8,200	13,000	11,600

*Cumulative values expressed within this report leverage historic methods to derive and / or estimate values. Methodologies and internal control frameworks regarding value reporting continue to evolve.

**Tracking for these data points began in 2021 as it relates to the five-year, \$1.25 billion commitment to racial equality and economic opportunity.

***No grants awarded in 2020 as funds were reallocated to support the critical operating needs for arts partners.

	UNITS	2019	2020	2021
Total Community Development Financial Institutions (CDFIs) with loans, investments, deposits and/or capital grants as of year-end	# of CDFIs	254	256	252
CDFI loans, investments, deposits and/or capital grants that closed during the year	\$ USD in millions	337	394	400
Total CDFI loans, investments, deposits and capital grants as of year-end	\$ USD in billions	1,700	1,800	2,200
Green, Social and Sustainability bonds issued – cumulative since 2013*	\$ USD in millions # bonds	6,850 6	9,850 8	11,900 9
Tax Equity renewable energy portfolio size – cumulative since 2007*	\$ USD in millions	8,500	10,100	12,328
Renewable energy installed through tax equity investments – cumulative since 2007*	# in Megawatts	24,916	33,163	37,940
GRI: 413-1: Operations with local community engagement, impact assessments, and development programs	Our company , What we offer , Enabling financial health ; Small business ; Homeownership			
Branches located in LMI geographies	% of branches	29.4%	29.5%	29.9%
Community Development Banking Investments to help build strong, sustainable communities by financing affordable housing and economic development across the country – including lending, equity investments and debt commitments	\$ USD in millions	4,880	5,870	6,600
Value of first mortgages extended to U.S. homeowners	\$ USD in millions	72,478	69,053	79,684
Value of first mortgages to LMI customers	\$ USD in millions	7,956	9,829	10,731
Total first mortgage customers	# of customers % of customers	135,900 50.1	135,598 56.2	141,098 61.9
LMI first mortgage customers	# of customers % of customers	30,999 22.8	38,662 28.5	39,193 27.8
Value of home equity lines of credit extended to LMI customers	\$ USD in millions	1,987	1,403	734
Total credit to small business owners (new and renewal)	\$ USD in millions	38,900	50,300	34,800
New credit to small business owners	\$ USD in millions	9,185	5,058	9,333

*Cumulative values expressed within this report leverage historic methods to derive and / or estimate values. Methodologies and internal control frameworks regarding value reporting continue to evolve.

	UNITS	2019	2020	2021
LMI loans extended to small businesses*	\$ USD in millions # of loans	7,668 435,691	14,650 445,007	11,836 600,959
Small business loans that are LMI loans	% of small business loans	71	65	77
Small business clients**	# clients in millions	-	-	10,520
GRI 201-1: Direct economic value generated and distributed	Financial Statements within 2021 Annual Report			
GRI 203-2: Significant indirect economic impacts	Our company. What we offer. Enabling financial health. Small business Prosperity, Enabling financial health 2021 Annual Report			
GRI 201-2: Financial implications and other risks and opportunities due to climate change	2021 CDP Climate Change Report; 2020 TCFD Report			
GRI 201-3: Defined benefit plan obligations and other retirement plans	Working here. Being a great place to work. Wellness & benefits 2021 Annual Report , Note 17, Pension and Postretirement Plans			
GRI 201-4: Financial assistance received from government	Bank of America did not benefit from any direct capital or liquidity assistance from the U.S. government in 2021.			
GRI 407-1: Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	With respect to our operations, no U.S.-based employees are subject to collective bargaining agreements. For our supply chain, we do not collect this data.			
GRI 412-1: Operations that have been subject to human rights reviews or impact assessments	HR Statement , Vendor Code of Conduct and Modern Slavery Act Statement			
GRI 414-1: New suppliers that were screened using social criteria	As part of our supply chain monitoring process, all suppliers receive our Vendor Code of Conduct , which sets forth our expectations for human rights, labor and environmental standards throughout our global supply chain. We monitor compliance with the code using a risk-based approach, which includes assessing our largest suppliers for ESG risk prior to contracting. Our contract templates include terms to ensure that our suppliers are obligated to comply with the expectations set forth in our code.			

*PPP contributed to higher loan balance extensions in 2020.

**Methodology used to determine this metric changed in 2021, so data prior to this period would not be comparable.

ENABLING FINANCIAL HEALTH (PROSPERITY)	UNITS	2019	2020	2021
Visits to Better Money Habits – English	# in millions	5.3	6	6.1
Visits to Better Money Habits - Spanish	# in thousands	448	1,000	1,500
Total SafeBalance accounts as of year-end	# in thousands	1,604	2,345	3,200
Consumer demand deposit accounts (DDAs) opened during the year that were SafeBalance Banking accounts	% of consumer DDAs	32	36	37
Total DDAs that are SafeBalance accounts	% of consumer DDAs	5	7	9
Mobile banking users added during the year	# in thousands	2,740	1,609	2,197
Total mobile banking users as of year-end	# in thousands	29,173	30,782	32,980
Global Wealth & Investment Management client balances and assets invested in a strategy with a clearly defined investment ESG approach	\$ USD in millions	25,100	36,800	55,600

Planet, people and prosperity:

Sustainable finance

At Bank of America, sustainability guides how we conduct our business and operations as well as how we pursue Responsible Growth across core lending and investments, equity and debt capital markets activities, advisory services, supply chain financing and management, daily operations and engagement with internal teammates.

The Global Sustainable Finance Group works with our Management Team and partners across 8 lines of business to establish our firmwide sustainable finance strategy, sets firmwide capital deployment and mobilization goals (such as our \$1.5 trillion sustainable finance commitment by 2030), drives thought leadership across international alliances and taskforces, helps expand existing sustainable finance activities across LOBs and innovates in new areas of decarbonization financing and investments (such as green project finance and catalytic blended finance structures for emerging markets). We focus on delivering a consistent framework on taxonomy, process and impact evaluation across the firm, and stay laser focused on enterprise goals of achieving net zero emissions before 2050 and ensure in all of our businesses and communities, we deliver for the 17 United Nations Sustainable Development Goals.

The two main pillars of the Sustainable Finance business focus are:

Environmental Transition

Address climate change and promote the circular economy including solutions for renewable energy, energy efficiency, clean transportation, water & sanitation, recycling, sustainable agriculture, and carbon capture & sequestration



Inclusive Social Development

Advance community development, affordable housing, healthcare, education, financial inclusion, and gender/racial equality



Segmentation	Environmental Transition (\$ USD MM)	Social Inclusive Development (\$ USD MM)	Total 2021 Activity (\$ USD MM)
Global Corporate and Investment Bank: Advisory, lending, leasing and capital markets activity for clients and activity aligned with the SDGs	109,804	48,904	158,708
Global Markets: Capital markets advisory, underwriting and distribution for municipal and corporate clients and activity aligned with the SDGs	28,727	19,328	48,055
Global Commercial Banking: Advisory, lending, leasing and capital markets activity for clients and activity aligned with the SDGs	1,997	9,725	11,722
Business Banking: Lending to clients aligned with the SDGs	12	238	250
Retail and Preferred: Hybrid/Electric Vehicle lending, LMI lending for homeownership and small business	1,127	7,395	8,522
Merrill and Private Bank: Increase in client assets with a clearly defined ESG investment approach	12,531	6,265	18,796
All Other	3,126	2,484	5,610
Total	157,324	94,339	251,663



ENVIRONMENTAL SUSTAINABILITY	UNITS	2019	2020	2021
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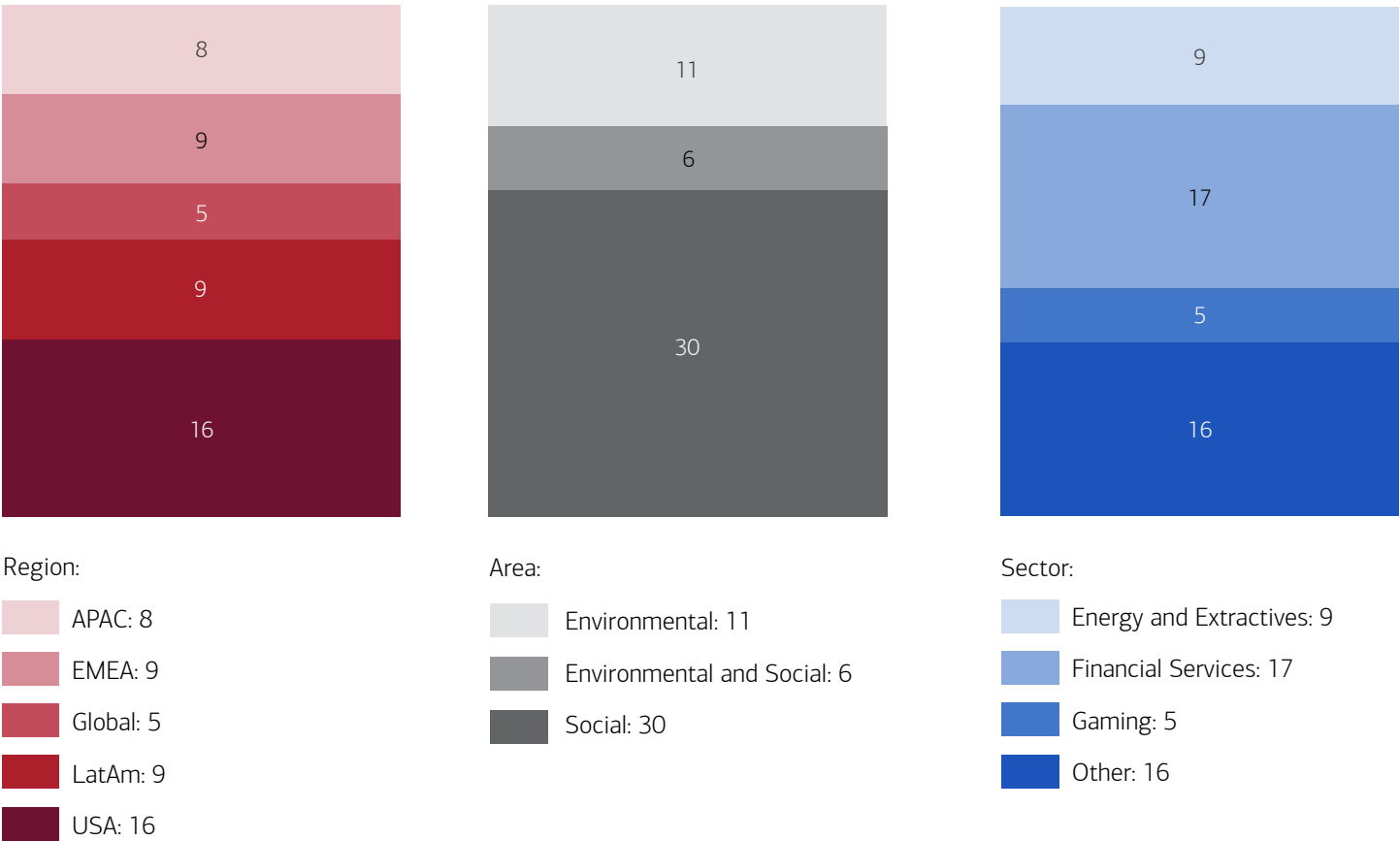
Environmentally-focused giving	\$ USD in millions	24	20.1	20.1
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ENVIRONMENTAL AND SOCIAL RISK

Indicator	Response	Year
# of transactions subject to the Equator Principles	2 Category B transactions in the power generation sector (United States)	2016
	2 Category B transactions in the oil & gas sector (United States)	2017
	1 Category B transaction in the petrochemicals sector (United States)	2018
	1 Category A transaction, 1 Category B transaction, both in the oil and gas sector (United States).	2019
	1 Category B transaction in the oil & gas sector (Canada)	2020
	2 Category B transactions: one in the oil & gas sector (Canada) and one in the power generation sector - wind (USA)	2021
Examples of transactions requiring additional review	<p>Examples of transactions requiring additional review:</p> <ol style="list-style-type: none"> 1. Bank of America was invited to support advisory services and a capital markets opportunity for a commercial agricultural company in a developing part of the world. Bank of America consulted with an independent consultant on the various ESG risks faced by this firm, specific to their geography of operations and in their supply chain. As a condition of our involvement and the capital markets opportunity, the company committed to a number of improvements on transparency, managing supply chain traceability, and on better ways to address human rights issues. 2. Bank of America was approached by a company with international operations in the chemicals sector to provide financial products and services to the firm. Bank of America ESG subject matter experts conducted an enhanced review of the firm's ESG performance. The review included direct engagement with senior and executive staff from the firm on various aspects of their performance on environmental, social, and governance concerns. The bank's ESG subject matter experts represented these risks to an internal Bank of America review committee to discuss the history of issues at this firm and their trajectory of improved performance. After this review, Bank of America decided to move forward on engagement with the firm. 3. Bank of America was asked by a company in the steel processing and mining sector to help underwrite an opportunity in the capital markets. Bank of America retained a consultant to conduct an independent review of the firm's ESG performance. Using the independent review as a guideline, Bank of America subject matter experts engaged with senior and executive staff from the company to further evaluate the company's public commitments and goals on ESG issues. Bank of America moved forward with providing products and services to the firm and will continue to monitor the firm's improvement on ESG issues including climate change related goals and targets, improved community engagement and environmental risk management at mining operations. 	2021

Environmental and Social Risk Policy Framework Reporting

Environmental and Social Risk Policy Framework (ESRPF) related items, relationships and transactions discussed by the responsible risk committees in 2021.



In 2021, we continued our process of tracking ESRP Framework related items, relationships and transactions reviewed by the responsible risk committees. Our front-line units have primary responsibility for evaluating and managing all risks, including the environmental and social risks inherent within their businesses. Through this process of due diligence, many issues are resolved and do not need to be escalated to risk review committee. The chart above represents only those items, relationships or transactions related to environmental or social risk that were discussed by the responsible risk committees. For more information about our governance structure or risk framework, see the Business Standards report or the ESRP Framework.

About Our 2021 Environmental Operations Data

We continue to track and manage the environmental impacts of our operations and refine our methodology in order to most accurately collect and report on these data. Our 2021 environmental activities are reported here using the Global Reporting Initiative Standards, as well as its Financial Services Sector Disclosure.

GREENHOUSE GAS EMISSIONS	UNITS	2010 (baseline)	2019	2020	2021
Scope 1 and location-based Scope 2 emissions					
Scope 1 direct emissions	Metric tons CO ₂ e	106,870	62,639	53,390	57,076
Location-based Scope 2 indirect emissions	Metric tons CO ₂ e	1,678,547	722,188	650,553	601,906
Total Scope 1 and location-based Scope 2 emissions	Metric tons CO ₂ e	1,785,417	784,826	703,943	658,982
Reduction in total Scope 1 and location-based Scope 2 emissions	Percent decrease from base year	-	56%	61%	63%
Scope 1 and market-based Scope 2 emissions					
Scope 1 direct emissions	Metric tons CO ₂ e	106,870	62,639	53,390	57,076
Market-based Scope 2 indirect emissions	Metric tons CO ₂ e	1,644,068	17,520	7,645	13,886
Total gross Scope 1 and market-based Scope 2 emissions	Metric tons CO ₂ e	1,750,939	80,159	61,035	70,963
Carbon offsets retired	Metric tons CO ₂ e	0	80,159	61,035	70,963
Total net Scope 1 and market-based Scope 2 emissions	Metric tons CO ₂ e	1,750,939	0	0	0
GRI: 305-1: Direct (Scope 1) GHG emissions; Reduction in total Scope 1 and market-based Scope 2 emissions	Percent decrease from base year	-	100%	100%	100%
GRI: 305-2: Energy indirect (Scope 2) GHG emissions		See above; more background on Making an impact, Environmental sustainability; 2021 CDP Climate Change Report			
Scope 3 indirect emissions					
Category 1 - purchased goods and services	Metric tons CO ₂ e	-	1,864,660	1,613,395	1,436,100
Category 2 - capital goods	Metric tons CO ₂ e	-	122,210	86,252	46,183
Category 3 - fuel- and energy-related activities	Metric tons CO ₂ e	325,236	143,002	123,011	141,748
Category 4 - upstream transportation and distribution	Metric tons CO ₂ e	243,881	140,215	116,149	124,780
Category 5 - waste (traditional disposal)	Metric tons CO ₂ e	-	22,326	15,850	11,757

GREENHOUSE GAS EMISSIONS		UNITS	2010 (baseline)	2019	2020	2021
Scope 3 indirect emissions						
Category 6	Business travel*	Metric tons CO ₂ e	195,126	161,748	31,481	18,822
	Business travel carbon offsets retired	Metric tons CO ₂ e	0	0	31,482	18,823
	Total net Scope 3 business travel emissions	Metric tons CO ₂ e	195,126	161,748	0	0
Category 7 - employee commuting**		Metric tons CO ₂ e	675,193	378,088	126,066	144,625
Category 8 - upstream leased assets		Metric tons CO ₂ e	Not relevant	Not relevant	Not relevant	Not relevant
Category 9 - downstream transportation and distribution		Metric tons CO ₂ e	-	1,400,000	1,200,000	1,000,000
Category 10 - processing of sold products		Metric tons CO ₂ e	Not relevant	Not relevant	Not relevant	Not relevant
Category 11 - use of sold products		Metric tons CO ₂ e	—	4,000	3,000	3,000
Category 12 - end of life treatment of sold products		Metric tons CO ₂ e	—	16,000	12,000	9,000
Category 13 - downstream leased assets		Metric tons CO ₂ e	Not relevant	Not relevant	Not relevant	Not relevant
Category 14 - franchises		Metric tons CO ₂ e	Not Relevant	Not Relevant	Not Relevant	Not Relevant
Category 15 - investments***		Metric tons CO ₂ e	-	-	-	-
GRI: 305-3: Other indirect (Scope 3) GHG emission		See above and also: Making an impact, Environmental sustainability; 2021 CDP Climate Change Report				
GRI 305-5: Reduction of GHG emission						

We follow the WRI and WBCSD Greenhouse Gas Protocol Corporate Accounting and Reporting Standard to calculate Scope 1, 2 and 3 emissions. We use an operational control approach to define our boundary. The base year for emissions reductions is 2010; the rationale for choosing 2010 as the base year is that 2010 is the earliest year with complete, high quality data. Scope 1 and 2 calculations are based on site-specific data for fuel consumed and utilities purchased, applying published emissions factors and global warming potentials (GWPs). Scope 3 calculations are based on data for the relevant activity, applying published emissions factors and GWPs. Where actual data is not available, estimates are made based on actual data collected in prior years. The gases included in the calculation of Scope 1, 2 and 3 emissions are CO₂, CH₄, N₂O, HFCs and PFCs. Our market-based greenhouse gas emissions include the impact of renewable energy certificates (RECs) purchased in the U.S., Renewable Energy Guarantees of Origin (REGOs) purchased in the U.K., Guarantees of Origin (GOs) purchased in Spain and Ireland, J-Credits purchased for Japan, PowerPlus purchased for India, and International RECs (I-RECs). All U.S. RECs purchased by Bank of America are Green-e certified. Emissions reflect supplier-specific emission rates where available, all of which comply with Scope 2 Guidance criteria. Emissions reflect residual mix factors for European facilities. Residual mix factors are not currently available for facilities outside of Europe. Location-based emission factors are used to quantify electricity-related Scope 3 emissions.

Emissions are recalculated back to the base year when a change to a prior inventory would result in a change in emissions of 0.5% or greater. Therefore, prior year values shown in the current year of this report may not match the values published in prior reports.

Impact of greenhouse gas emissions	The societal impact of Scope 1, Scope 2 (location-based) and Scope 3 (categories 1-7, 9, 11-12) emissions in 2021 was estimated to be \$183,345,000. This figure was calculated using the EPA's 2020 cost of carbon of \$51 / metric ton CO ₂ (3% discount rate, reported in 2020 USD).
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*Impacted by the health and humanitarian crisis.

**Calculated commuting emissions also include employee use of laptops and monitors at home due to the virtual posture in 2021.

***Relevant financed emissions will be published in our 2021 TCFD Response which will be released in September 2022.

CARBON OFFSETS PROJECT/PRODUCT	Country	Registry	Vintage	Type	Quantify Applied			
					2010	2019	2020	2021
GreenTrees Reforestation Project	United States	American Carbon Registry	2015	Removal	-	15,000	15,000	17,000
Cordillera Azul REDD+ Project	Peru	IHS Markit	2015-2016	Avoidance	-	24,337	47,557	17,000
TIST Small Group Tree Planting: Kenya, Uganda	Uganda, Kenya	Verra	2016-2017	Removal	-	20,000	15,000	19,000
Katingan Peatland Restoration and Conservation Project	Indonesia	Verra	2017-2018	Avoidance	-	20,000	15,000	36,786

Offsets are sourced from four projects: GreenTrees Reforestation Project, Cordillera Azul REDD+ Project, TIST Small Group Tree Planting: Kenya, Uganda, and the Katingan Peatland Restoration and Conservation Project. Offset retirements are subtracted from gross Scope 1 and market-based Scope 2 emissions, resulting in net Scope 1 and market-based Scope 2 emissions of zero. Offsets are also applied to Scope 3 Business Travel emissions, resulting in net Business Travel emissions of zero.

Table represents sum of all offsets retired per year, which represents Scope 1, Scope 2, and Scope 3 Business Travel emissions.

GREENHOUSE GAS EMISSIONS BY REGION	Units	2021 GROSS LOCATION-BASED EMISSIONS			2021 GROSS MARKET-BASED EMISSIONS		
		Scope 1 direct emissions	Scope 2 indirect emissions	Total Scope 1 and Scope 2 emissions	Scope 1 direct emissions	Scope 2 indirect emissions	Total Scope 1 and Scope 2 emissions
U.S. & Canada	Metric tons CO ₂ e	52,853	507,856	560,709	52,853	5,479	58,332
Asia Pacific	Metric tons CO ₂ e	645	73,813	74,458	645	7,718	8,363
Europe, Middle East and Africa (EMEA)	Metric tons CO ₂ e	3,552	18,700	22,251	3,552	444	3,996
Latin America	Metric tons CO ₂ e	27	1,538	1,565	27	245	272
GREENHOUSE GAS EMISSIONS BY COUNTRY							
United States	Metric tons CO ₂ e	52,829	507,706	560,535	52,829	5,479	58,308
India	Metric tons CO ₂ e	363	46,028	46,391	363	230	593
United Kingdom	Metric tons CO ₂ e	2,500	15,716	18,216	2,500	0	2,500
China	Metric tons CO ₂ e	150	10,912	11,062	150	234	384
Southeast Asia - Singapore, Malaysia, Philippines, Thailand, and Indonesia	Metric tons CO ₂ e	26	6,473	6,499	26	5,532	5,557
Japan	Metric tons CO ₂ e	30	4,895	4,924	30	1	31
Australia	Metric tons CO ₂ e	1	1,984	1,986	1	0	1

GREENHOUSE GAS EMISSIONS BY REGION	Units	2021 GROSS LOCATION-BASED EMISSIONS			2021 GROSS MARKET-BASED EMISSIONS		
		Scope 1 direct emissions	Scope 2 indirect emissions	Total Scope 1 and Scope 2 emissions	Scope 1 direct emissions	Scope 2 indirect emissions	Total Scope 1 and Scope 2 emissions

GREENHOUSE GAS EMISSIONS BY COUNTRY							
Ireland	Metric tons CO ₂ e	506	728	1,234	506	0	506
South Korea	Metric tons CO ₂ e	75	1,073	1,148	75	1,073	1,148
Taiwan	Metric tons CO ₂ e	8	1,092	1,100	8	642	650
Canada	Metric tons CO ₂ e	24	150	174	24	0	24
Rest of World	Metric tons CO ₂ e	565	5,149	5,714	565	696	1,260

Table shows the top 10 countries plus Canada with the highest total gross scope 1 and location-based scope 2 emissions.

NOx, SOx, AND OTHER SIGNIFICANT AIR EMISSIONS FROM DIRECT COMBUSTION	Units	2010 (baseline)	2019	2020	2021
SOx	Metric tons	17	1	1	1
NOx	Metric tons	44	20	19	19
CO	Metric tons	56	32	27	27
VOC	Metric tons	7	2	2	2
PM	Metric tons	4	3	3	3
Ozone depleting substances	Metric tons CFC-11e	3	2	3	3
Impact of air pollution	\$ USD	-	-	135,000	134,000
GRI 305-6: Emissions of ozone-depleting substances (ODS) GRI 305-7: Nitrogen oxides (NO _x), sulfur oxides (SO _x), and other significant air emissions	See above and 2021 CDP Climate Change Report: Making an impact, Environmental sustainability				

Data are sourced from the Scope 1 and 2 inventory and records kept through our compliance program. Significant air emissions are calculated based on site-specific data and published emission factors. We use the same boundary in calculating these air emissions as in our greenhouse gas emissions calculations. R-22 is an ozone depleting substance with a high global warming potential. BAC destroys R-22 from our operations when we decommission equipment instead of re-selling to encourage the complete phase out of R-22 from the market.

The impact of air pollution (SOx, NOx, CO, VOCs, and PM) is calculated using social cost factors of each pollutant as reported in the World Resources Institute's Transport Emissions & Social Cost Assessment Tool v 1.0.

DIRECT AND INDIRECT ENERGY CONSUMPTION	Units	2010 (baseline)	2019	2020	2021
Electricity	Gigajoules	11,889,018	6,906,976	6,581,843	6,348,311
Other indirect (purchased steam and cooling)	Gigajoules	200,907	153,249	155,049	151,197
Natural gas	Gigajoules	1,488,556	894,254	752,984	758,595
Other direct (fuel oil, jet fuel, gasoline, diesel fuel, propane)	Gigajoules	337,952	161,827	105,860	165,529
Total energy	Gigajoules	13,916,433	8,116,305	7,595,737	7,423,632
Reduction in total energy GRI 302-4: Reduction of energy consumption	Percent decrease from base year	-	42%	45%	47%

GRI: 302-1: Energy consumption within the organization

See above. More info on [Making an impact. Environmental sustainability; 2021 CDP Climate Change Report.](#)

Data are sourced from utility bills where possible. Where utility bills are not available (such as in a leased property), we estimate based on internal estimation intensities by building type. These estimation intensities are calculated annually based on actual data. We use the same boundary in calculating energy consumption as in our greenhouse gas emissions calculations.

ELECTRICITY FROM RENEWABLE SOURCES	Units	2010 (baseline)	2019	2020	2021
Electricity consumption	MWh	3,302,505	1,918,604	1,828,290	1,763,420
Total renewable electricity procured	MWh	39,598	2,054,300	1,994,293	1,780,488
% of electricity from renewable sources	% of electricity	1%	107%	109%	101%

Bank of America adheres to certification, geography, technology, and project age standards when purchasing Renewable Energy Certificates (RECs), Renewable Energy Guarantees of Origin (REGOs), Guarantees of Origin (GOs), J-Credits, PowerPlus, and International RECs (I-RECS).

REDUCTIONS IN GREENHOUSE GAS EMISSIONS AND ENERGY CONSUMPTION	Units	2010 (baseline)	2019	2020	2021
Projected annual emissions savings from reduction initiatives	Metric tons CO ₂ e	-	2,933	3,670	10,994
Projected annual savings from energy efficiency measures	Gigajoules	-	33,762	39,788	109,467

GRI 302-5: Reductions in energy requirements of products and services

See above; for more visit [Making an impact, Environmental sustainability](#)

Data are sourced from records kept by Real Estate Services, which records each project undertaken and relevant details, including project annual electricity or fuel savings and projected annual monetary savings. Energy savings are estimated based on projections of project performance.

Destroying R-22

Bank of America has made the decision to destroy R-22 from our operations when we decommission equipment instead of re-selling to encourage its complete phase out from the market. R-22 is an ozone depleting substance with a high global warming potential.

CLIMATE-RELATED CAPITAL EXPENDITURE	Units	2010 (baseline)	2019	2020	2021
Projected annual monetary investment on climate-related capital expenditure	\$ USD in thousands	-	-	-	92,948

Includes capital expenditure on onsite solar panels and energy and water savings projects. Savings estimated based on projections of project performance and average cost of energy and water at sites where projects are implemented.

INDIRECT ENERGY CONSUMPTION BY FUEL MIX	Units	2010 (baseline)	2019	2020	2021
Coal	% of mix	35%	19%	17%	14%
Petroleum	% of mix	3%	1%	1%	1%
Natural gas	% of mix	30%	42%	44%	46%
Nuclear	% of mix	23%	23%	22%	22%
Renewable	% of mix	9%	15%	16%	17%

These data represent the mix of primary energy consumed to produce the intermediate energy (electricity, steam, chilled water) used. They represent primarily the mix of grid electricity sources provided by electricity suppliers, and thus are distinct from the above tracking of electricity from renewable sources, which represent the bank's proactive purchase and implementation of renewable electricity.

INDIRECT ENERGY CONSUMPTION BY PRIMARY FUEL SOURCE	Units	2010 (baseline)	2019	2020	2021
Coal	Gigajoules	13,024,897	4,192,337	3,448,427	2,830,605
Petroleum	Gigajoules	791,057	184,799	114,594	112,612
Natural gas	Gigajoules	8,357,102	6,395,315	6,412,249	6,530,861

These data represent total source energy consumed to produce the intermediate energy (electricity, steam, chilled water) used.

RENEWABLE MATERIAL USAGE - PAPER	Units	2010 (baseline)	2019	2020	2021
	Metric tons	65,501	39,262	28,594	26,788
	Percent decrease from base year	-	40%	56%	59%
Total usage	Recycle input materials by weight	8%	15%	14%	15%
	Certified input materials by weight	-	99.3%	99.3%	98.6%

GRI 301-1: Materials used by weight
or volume

GRI 301-2: Recycled input
materials used

[Making an impact, Environmental sustainability](#). Also: in 2022, we announced that we will use 80% recycled plastic in credit and debit card production. For more, see newsroom.bankofamerica.com.

Paper is purchased from external suppliers. Data are sourced from direct measurements based on invoices from our paper vendors. Purchased paper includes copy paper, commercial paper, paper office supplies, and janitorial paper. Janitorial paper included for the first time in 2021. We have a commitment to the procurement of environmentally and socially sustainable paper products. Details can be found in our Paper Procurement Policy.

WATER	Units	2010 (baseline)	2019	2020	2021
Total water withdrawals	Billion US gallons Megaliters	3.54 13,410	1.99 7,517	1.77 6,689	1.67 6,325
Total potable water withdrawals GRI 303-3: water withdrawal	Billion US gallons Megaliters	3.52 13,331	1.95 7,398	1.74 6,599	1.64 6,223
Reduction in potable water withdrawals	% decrease from base year	-	45%	50%	53%
Water withdrawals by source – Third- Party (municipal)	Megaliters % withdrawals	13,410 100%	7,423 98.8%	6,624 99.0%	6,243 98.7%
Water withdrawals by source - Groundwater	Megaliters % withdrawals	- -	14 0.2%	16 0.2%	- -
Water withdrawals by source – Surface Water (rainwater)	Megaliters % withdrawals	- -	80 1.1%	48 0.7%	83 1.3%
Total water consumption GRI 303-5: water consumption	Billion US gallons Megaliters	0.57 2,149	0.43 1,615	0.39 1,492	0.39 1,492
Estimated annual savings from water reduction projects	Thousand US gallons	-	46,303	23,913	8,455
GRI: 303-1: Interactions with water as a shared resource	Water is withdrawn from municipal sources (except for a small amount of rainwater) and discharged to municipal sewer systems and their associated treatment facilities. For more: Making an impact, Environmental sustainability; 2021 CDP Climate Change Report				
Third-party withdrawals and consumption from regions with high or extremely high baseline water stress	Megaliters withdrawals			2,625	2,571
	Megaliters consumption	-	-	619	680
	% withdrawals			40%	41%
	% consumption			41%	46%

Data for water withdrawals are sourced from utility bills where possible. Where utility bills are not available (such as in a leased property), we estimate based on internal estimation intensities by building type. These estimation intensities are calculated annually based on actual data. We use the same boundary in calculating water withdrawals as in our greenhouse gas emissions calculations. Water is withdrawn from municipal sources (except for a small amount of rainwater) and discharged to municipal sewer systems. Water consumption is equal to water used for irrigation. Data for groundwater and rainwater are sourced from meter readings for the systems in place.

Potable water is defined as water treated to levels that meet state and federal standards for consumption. For BAC, this includes all water except grey water used for irrigation, untreated groundwater, and reclaimed water.

Water values are recalculated back to the base year when a change to a prior inventory would result in a change in water values of 0.5% or greater. Therefore, prior year values shown in the current year of this report may not match the values published in prior reports.

Baseline water stress is determined according to the WRI Aqueduct Water Risk Atlas tool.

WASTE	UNITS	DISPOSAL METHOD	2011 (baseline)	2019	2020	2021
E-waste disposed through certified vendors	Percent certified		68%	100%	100%	100%
Non-hazardous waste (office, confidential, construction and demolition, electronic, and other)	Metric tons	Landfill & incineration	60,370	43,032	29,115	21,957
	Metric tons	Recycling, compost & remarketing	68,217	59,929	47,126	44,818
	Diversion rate		53%	58%	62%	67%
Hazardous waste	Metric tons	Landfill & incineration	3	0.5	0.7	0.5
	Metric tons	Recycling, reuse & salvage	334	466	511	507
	Diversion rate		99.2%	99.9%	99.9%	99.9%
Construction & Demolition Waste	Metric tons	Landfill & incineration	12,523	12,860	7,939	5,478
	Metric tons	Recycling, reuse & salvage	18,046	21,781	18,969	14,654
	Diversion rate		59%	63%	70%	73%
Total waste GRI: 306-1: Waste generation and significant waste-related impacts GRI: 306-2: Management of significant waste-related impacts GRI: 306-3: Waste generated	Metric tons	Landfill & incineration	60,373	43,033	29,115	21,957
	Metric tons	Recycling & other diversion	68,551	60,395	47,637	45,325
	Metric tons	Total waste	128,924	103,428	76,752	67,282
	Waste to landfill percent decrease from base year		N/A	29%	52%	64%
	Diversion rate		53%	58%	62%	67%

The base year for waste data is 2011. Data are sourced where possible from vendors that provide waste removal services. Where weight data are not available (such as in a leased property), we estimate based on internal intensities by building type which were developed using actual data. We use the same boundary in calculating waste as in our greenhouse gas emissions calculations. The waste disposal method was determined from data provided by the waste vendors. Numbers may not sum exactly due to rounding. Regulated waste is reported on a 1-year lag, so the 2021 waste data includes regulated waste from 2020.

Waste values are recalculated back to the base year when a change to a prior inventory would result in a change in water values of 0.5% or greater. Therefore, prior year values shown in the current year of this report may not match the values published in prior reports.

FACILITIES	UNITS	2010 (baseline)	2019	2020	2021
LEED® (or comparable) certifications	Net square feet	12,537,553	18,972,322	17,822,422	17,882,033
	Percent of total square footage	10%	25%	24%	25%
Land use and ecological sensitivity – U.S. GRI 304-1: Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Sites that intersected with areas protected for biodiversity	-	-	9	10
	Area of buildings (square meters)	-	-	6,900	7,120

FOOD	UNITS	(baseline)	2019	2020	2021
Cool Food Pledge Emissions	Metric tons CO ₂ e		-	-	4,403
Cool Food Pledge - reduction in total food-related emissions	% reduction in total food-related emissions	Not Available – this initiative launched in 2021	-	-	44%
Food Donations	lbs	-	-	-	26,401

Bank of America is part of the World Resources Institute (WRI) Cool Food Pledge, where companies pledge to provide delicious food that is better for the planet and commit to a collective target of reducing GHG emissions associated with the food they provide by 25% by 2030, relative to 2015. Emissions are calculated by WRI based on food types and amounts submitted by Bank of America.

TRANSPORTATION	UNITS	2010 (baseline)	2019	2020	2021
Electric vehicle charging	Sites with charging stations	-	57	57	56
	Charging stations	-	213	240	254
Support production and use of one billion gallons of SAF by 2030	# of gallons	-	N/A	N/A	N/A

Total charging stations installed at Bank of America sites includes the cumulative number of global charging stations active in the reporting year.

COMPLIANCE	UNITS	2010 (baseline)	2019	2020	2021
Non-compliance with environmental regulations	Value of monetary fines in \$ USD	23,854	657	2,700	-
	Non-monetary violations	9	1	1	2
Reportable spills	# of spills	2	0	3	1
	Volume – US gallons	3	0	41	60

ENVIRONMENTAL SPEND	UNITS	2010 (baseline)	2019	2020	2021
Total environmental protection spend	Value of spend (\$ USD in millions)	-	15.1	14.5	15.8
GRI 307-1: Non-compliance with environmental laws and regulations.	Refer to the disclosure of significant litigation, regulatory matters and material legal proceedings in Note 12 on pages 173–177 of the 2021 Financial Review (2021 Annual Report) .				

Data are sourced from our compliance management system, in which we record all instances of non-compliance with environmental regulations and spills; and spend with select third-party suppliers on environmental protection and compliance.

SUPPLIER ENGAGEMENT	UNITS	2010 (baseline)	2019	2020	2021
Suppliers invited to CDP Supply Chain	# of suppliers	89	191	197	210
Spend invited to CDP Supply Chain information requests	% of previous year's spend	-	73%	75%	75%
Response rate to our CDP Supply Chain information requests	% responded	84%	92%	90%	91%
Suppliers reporting GHG emissions as part of CDP Supply Chain information requests	% reporting emissions	-	83%	86%	88%
Suppliers reporting greenhouse gas or renewable energy targets as part of BAC CDP Supply Chain information requests	% reporting targets	-	65%	71%	73%
Spend with suppliers who report GHG or renewable energy targets	% of previous year's spend	-	44%	59%	61%
Spend with suppliers assessed for ESG risks as outlined by our Vendor Code of Conduct	% of current year spend	-	-	-	63%
GRI: 308-1: New suppliers that were screened using environmental criteria					
GRI 308-2: Negative environmental impacts in the supply chain and actions taken	We sent the CDP (formerly Carbon Disclosure Project) Supply Chain Climate Questionnaire to 210 suppliers, which collectively represented 75% of our supply chain spend. 91% of these suppliers responded to the questionnaire. Additionally, as part of our supply chain monitoring process, all suppliers receive our Vendor Code of Conduct , which sets forth our expectations for human rights, labor and environmental standards throughout our global supply chain. We monitor compliance with the code using a risk-based approach, which includes assessing our largest suppliers for ESG risk prior to contracting. Our contract templates include terms to ensure that our suppliers are obligated to comply with the expectations set forth in our code.				

Our selection process for inviting suppliers to the CDP Supply Chain survey takes into account both the environmental impact and spend with the supplier. Percent of spend metrics for greenhouse gas emissions reporting and greenhouse gas or renewable energy targets include information from both CDP and supplier-provided public reports.



Diverting plastic waste

In 2022, we became the first U.S.-based bank to commit to transition all plastic consumer and commercial credit and debit cards to at least 80% recycled plastic starting in 2023.

GRI Content Index

Bank of America has reported the information cited in this GRI content index for the period January 1 - December 31, 2021 with reference to the GRI Standards.

Disclosure	Page Location/Response
2-1 Organizational details	Bank of America Corporation 2021 Annual Report, Financial highlights, About Bank of America- Our People, Our Passion, Our Purpose Direct Response ; Certificate of Incorporation available at bankofamerica.com/investor
2-2 Entities included in the organization's sustainability reporting	2021 Annual Report, Business segment operations
2-3 Reporting period, frequency and contact point	Making an impact, Find resources , ESG reporting questions regarding the ESG content in our ESG reporting should be directed to ESG_Information@bofa.com . All other questions should be directed to Investor Relations
2-4 Restatements of information	Re-statements are clearly marked throughout our reporting content
2-5 External assurance	Environmental and Social Assurance Statement
2-6 Activities, value chain and other business relationships	2021 Annual Report, Business overview
2-7 Employees	3
2-8 Workers who are not employees	Bank of America does not publicly disclose details on our contractors or the work they perform.
2-9 Governance structure and composition	7
2-10 Nomination and selection of the highest governance body	8
2-11 Chair of the highest governance body	7
2-12 Role of the highest governance body in overseeing the management of impacts	7
2-13 Delegation of responsibility for managing impacts	7
2-14 Role of the highest governance body in sustainability reporting	7
2-15 Conflicts of interest	7
2-16 Communication of critical concerns	7

Disclosure	Page Location/Response
2-17 Collective knowledge of the highest governance body	7
2-18 Evaluation of the performance of the highest governance body	8
2-19 Remuneration policies	8
2-20 Process to determine remuneration	8
2-21 Annual total compensation ratio	8
2-22 Statement on sustainable development strategy	8
2-23 Policy commitments	8
2-24 Embedding policy commitments	8
2-25 Processes to remediate negative impacts	8
2-26 Mechanisms for seeking advice and raising concerns	8
2-27 Compliance with laws and regulations	8
2-28 Membership associations	8
2-29 Approach to stakeholder engagement	9
2-30 Collective bargaining agreements	9
3-1 Process to determine material topics	Making an impact, Find resources, ESGReporting, Materiality, Definition of Issues
3-2 List of material topics	Making an impact, Materiality . Any significant changes are noted alongside data within our reporting content
3-3 Management of material topics	We apply the precautionary approach to identifying and addressing longer-term environmental, social and governance issues that may impact our business, clients and communities, including global climate change and racial equality. Our commitment to specific policies, industry best practices and collaboration with external experts helps to inform our risk assessments in these areas.

Disclosure	Page Location/Response
201-1 Direct economic value generated and distributed	12
201-2 Financial implications and other risks and opportunities due to climate change	12
201-3 Defined benefit plan obligations and other retirement plans	12
201-4 Financial assistance received from government	12
202-1 Ratios of standard entry level wage by gender compared to local minimum wage	N/A or omitted
202-2 Proportion of senior management hired from the local community	N/A or omitted
203-1 Infrastructure investments and services supported	10
203-2 Significant indirect economic impacts	12
204-1 Proportion of spending on local suppliers	N/A or omitted
205-1 Operations assessed for risks related to corruption	9
205-2 Communication and training about anti-corruption policies and procedures	9
205-3 Confirmed incidents of corruption and actions taken	N/A or omitted
206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	N/A or omitted
207-1 Approach to tax	N/A or omitted
207-2 Tax governance, control, and risk management	N/A or omitted
207-3 Stakeholder engagement and management of concerns related to tax	N/A or omitted
207-4 Country-by-country reporting	N/A or omitted
301-1 Materials used by weight or volume	23
301-2 Recycled input materials used	23
301-3 Reclaimed products and their packaging materials	N/A or omitted
302-1 Energy consumption within the organization	21
302-2 Energy consumption outside of the organization	N/A or omitted
302-3 Energy intensity	N/A or omitted
302-4 Reduction of energy consumption	21
302-5 Reductions in energy requirements of products and services	22

Disclosure	Page Location/Response
303-1 Interactions with water as a shared resource	N/A or omitted
303-2 Management of water discharge-related impacts	N/A or omitted
303-3 Water withdrawal	24
303-4 Water discharge	N/A or omitted
303-5 Water consumption	24
304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	26
304-2 Significant impacts of activities, products and services on biodiversity	N/A or omitted
304-3 Habitats protected or restored	N/A or omitted
304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	N/A or omitted
305-1 Direct (Scope 1) GHG emissions	17
305-2 Energy indirect (Scope 2) GHG emissions	17
305-3 Other indirect (Scope 3) GHG emissions	18
305-4 GHG emissions intensity	N/A or omitted
305-5 Reduction of GHG emissions	18
305-6 Emissions of ozone-depleting substances (ODS)	20
305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	20
306-1 Waste generation and significant waste-related impacts	25
306-2 Management of significant waste-related impacts	25
306-3 Waste generated	25
306-4 Waste diverted from disposal	N/A or omitted
306-5 Waste directed to disposal	N/A or omitted
308-1 New suppliers that were screened using environmental criteria	27
308-2 Negative environmental impacts in the supply chain and actions taken	27
401-1 New employee hires and employee turnover	3

Disclosure	Page Location/Response
401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	3
401-3 Parental leave	3
402-1 Minimum notice periods regarding operational changes	N/A or omitted
403-1 Occupational health and safety management system	4
403-2 Hazard identification, risk assessment, and incident investigation	4
403-3 Occupational health services	4
403-4 Worker participation, consultation, and communication on occupational health and safety	4
403-5 Worker training on occupational health and safety	5
403-6 Promotion of worker health	5
403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	5
403-8 Workers covered by an occupational health and safety management system	5
403-9 Work-related injuries	N/A or omitted
403-10 Work-related ill health	N/A or omitted
404-1 Average hours of training per year per employee	5
404-2 Programs for upgrading employee skills and transition assistance programs	5
404-3 Percentage of employees receiving regular performance and career development reviews	5
405-1 Diversity of governance bodies and employees	5
405-2 Ratio of basic salary and remuneration of women to men	5
406-1 Incidents of discrimination and corrective actions taken	N/A or omitted
407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	12
408-1 Operations and suppliers at significant risk for incidents of child labor	2021 Modern Slavery Act Statement
409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	2021 Modern Slavery Act Statement
410-1 Security personnel trained in human rights policies or procedures	2021 Modern Slavery Act Statement

Disclosure	Page Location/Response
411-1 Incidents of violations involving rights of indigenous peoples	N/A or omitted
413-1 Operations with local community engagement, impact assessments, and development programs	11
413-2 Operations with significant actual and potential negative impacts on local communities	N/A or omitted
414-1 New suppliers that were screened using social criteria	12
414-2 Negative social impacts in the supply chain and actions taken	2021 Modern Slavery Act Statement
415-1 Political contributions	9
416-1 Assessment of the health and safety impacts of product and service categories	N/A or omitted
416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	N/A or omitted
417-1 Requirements for product and service information and labeling	9
417-2 Incidents of non-compliance concerning product and service information and labeling	9
417-3 Incidents of non-compliance concerning marketing communications	9
418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	9