

Bank of America 2025 CDP Corporate Questionnaire (2024 data)

Submitted November 19, 2025; Published December 18, 2025



Important: this export excludes unanswered questions

This document is an export of your organization's CDP questionnaire response. It contains all data points for questions that are answered or in progress. There may be questions or data points that you have been requested to provide, which are missing from this document because they are currently unanswered. Please note that it is your responsibility to verify that your questionnaire response is complete prior to submission. CDP will not be liable for any failure to do so.

[Terms of disclosure for corporate questionnaire 2024 - CDP](#)

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C1. Introduction

(1.1) In which language are you submitting your response?

Select from:

☒ English

(1.2) Select the currency used for all financial information disclosed throughout your response.

Select from: ☒ USD

(1.3) Provide an overview and introduction to your organization.

(1.3.1) Type of financial institution

Select from: ☒ Bank

(1.3.2) Organization type

Select from: ☒ Publicly traded organization

(1.3.3) Description of organization

Bank of America Corporation (BoFA) is a financial institution serving consumers, small businesses and large corporations with a range of banking, investing/trading and other financial and risk management products and services. We're guided by a common purpose to help make financial lives better through the power of every connection. At BoFA, we set a goal to achieve net zero greenhouse gas (GHG) emissions across our financing activities, operations and supply chain before 2050 and established interim 2030 GHG targets to help us monitor near-term progress. We continue to pursue these goals by advising clients on climate-related risks and opportunities, supporting clients seeking to minimize their own impact on the environment and providing financing for society's ongoing transition to a more sustainable economy. The Company has a long track record of providing the advice, perspective and capital to help our clients – whether they are individuals, businesses, or institutional investors – and our communities address these societal and environmental changes to grow and succeed. In April 2021, the Company announced a goal to mobilize and deploy more than \$1.5 trillion in sustainable finance by 2030 - \$1 trillion of which is to accelerate the environmental transition. As of December 31, 2024, we have mobilized and deployed more than \$741 billion in sustainable finance across sectors and geographies.

Cautionary Information/Forward-Looking Statements: Responses to this survey may contain statements and opinions, including aspirations, targets, goals, efforts, programs, metrics, cumulative values and sustainability objectives regarding sustainability, including the environment (Sustainability Information or SI). SI may be based on current or historic aspirations, targets, goals, efforts, programs, estimates, assumptions, standards, metrics, methodologies and internal control frameworks and currently available data, which continue to evolve and develop. Any statements related thereto are not guarantees or promises any particular outcome will occur. SI is as of the submission date, subject to change without notice.

SI may also include the use of financial/nonfinancial metrics and other information that vary in source, quality, timeliness and completeness and are subject to significant measurement uncertainties and updates, which may include methodology, collection and verification of complex data, estimates, judgments and assumptions and underlying data obtained from multiple third parties, often which we cannot independently verify. Certain CDP statements may also constitute "forward-looking statements" (FLS) within the meaning of the Private Securities Litigation Reform Act of 1995, such as our goal to achieve net zero greenhouse gas (GHG) emissions before 2050 in our financing activities, operations and supply chain, interim 2030 GHG targets including financed emissions targets and sustainable finance goal, which may evolve over time and may be the subject of proposed legislative and regulatory changes across jurisdictions, that may have a significant impact on our future measurement and reporting, as well as results of the efforts and programs set forth in this survey. FLS are not based on historical facts, but reflect management's current expectations, plans or forecasts, do not guarantee future results or performance, involve certain known and unknown risks, uncertainties and assumptions that are difficult to predict and often beyond BoFA's control and are inherently uncertain. You should not place undue reliance on any FLS. Actual outcomes and results may differ materially from those expressed in, or implied by any FLS due to a variety of factors, including global sociodemographic and economic trends, energy prices, technological innovations and advances, climate-related conditions and weather events, legislative and regulatory changes, public policies, client/supplier/investor/government/other stakeholder engagement, the quality and availability of third-party data, including data measured, tracked and provided by data providers, our clients and other stakeholders, our ability to gather and verify data, successfully implementing sustainability-related initiatives under expected timeframes, third-party expectations, policies and procedures and other unforeseen events or conditions. Discussion of additional factors, including uncertainties and risks can be found in BoFA's 2024 Annual Report, on Form 10-K and subsequent U.S. Securities and Exchange Commission filings. FLS speak only as of the date they are made, and BoFA undertakes no obligation to update or revise any FLS.

(1.4) State the end date of the year for which you are reporting data. For emissions data, indicate whether you will be providing emissions data for past reporting years.

(1.4.1) End date of reporting year

12/31/2024

(1.4.2) Alignment of this reporting period with your financial reporting period

Select from: ☒ Yes

(1.4.3) Indicate if you are providing emissions data for past reporting years

Select from: ☒ No

(1.5) Provide details on your reporting boundary.

	Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?
	Select from: <input checked="" type="checkbox"/> Yes

(1.6) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

	Does your organization use this unique identifier?	Provide your unique identifier
Ticker symbol	Select from: <input checked="" type="checkbox"/> Yes	BAC

(1.7) Select the countries/areas in which you operate.

Select all that apply

- | | | |
|--|---|--|
| <input checked="" type="checkbox"/> Peru | <input checked="" type="checkbox"/> Turkey | <input checked="" type="checkbox"/> Australia |
| <input checked="" type="checkbox"/> Japan | <input checked="" type="checkbox"/> Greece | <input checked="" type="checkbox"/> Switzerland |
| <input checked="" type="checkbox"/> Chile | <input checked="" type="checkbox"/> Belgium | <input checked="" type="checkbox"/> Indonesia |
| <input checked="" type="checkbox"/> Colombia | <input checked="" type="checkbox"/> Israel | <input checked="" type="checkbox"/> Saudi Arabia |
| <input checked="" type="checkbox"/> Qatar | <input checked="" type="checkbox"/> Germany | <input checked="" type="checkbox"/> Singapore |
| <input checked="" type="checkbox"/> China | <input checked="" type="checkbox"/> Mexico | <input checked="" type="checkbox"/> South Africa |
| <input checked="" type="checkbox"/> Spain | <input checked="" type="checkbox"/> Ireland | <input checked="" type="checkbox"/> Taiwan, China |
| <input checked="" type="checkbox"/> India | <input checked="" type="checkbox"/> Sweden | <input checked="" type="checkbox"/> Republic of Korea |
| <input checked="" type="checkbox"/> Brazil | <input checked="" type="checkbox"/> Malaysia | <input checked="" type="checkbox"/> Hong Kong SAR, China |
| <input checked="" type="checkbox"/> Italy | <input checked="" type="checkbox"/> Thailand | <input checked="" type="checkbox"/> United Arab Emirates |
| <input checked="" type="checkbox"/> Canada | <input checked="" type="checkbox"/> Netherlands | <input checked="" type="checkbox"/> United States of America |
| <input checked="" type="checkbox"/> France | <input checked="" type="checkbox"/> Argentina | <input checked="" type="checkbox"/> United Kingdom of Great Britain and Northern Ireland |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> Philippines | |

(1.9) What was the size of your organization based on total assets value at the end of the reporting period?

3261519000000

(1.10) Which activities does your organization undertake, and which industry sectors does your organization lend to, invest in, and/or insure?

Banking (Bank)

(1.10.1) Activity undertaken

Select from: ☒ Yes

(1.10.6) Type of clients

Select all that apply

- | | |
|---|--|
| <input checked="" type="checkbox"/> Asset owners | <input checked="" type="checkbox"/> Government / sovereign / quasi-government / sovereign wealth funds |
| <input checked="" type="checkbox"/> Corporate and institutional clients (companies) | <input checked="" type="checkbox"/> Institutional investors |
| <input checked="" type="checkbox"/> Retail clients | <input checked="" type="checkbox"/> Business and private clients (banking) |

☒ Family offices / high network individuals

(1.10.7) Industry sectors your organization lends to, invests in, and/or insures

Select all that apply

☒ Retail

☒ Fossil Fuels

☒ Apparel

☒ Manufacturing

☒ Services

☒ Infrastructure

☒ Materials

[Fixed row]

☒ Power generation

☒ Hospitality

☒ International bodies

☒ Transportation services

☒ Food, beverage & agriculture

☒ Biotech, health care & pharma

C4. Governance

Climate change

(4.12) Have you published information about your organization's response to environmental issues for this reporting year in places other than your CDP response?

Select from:

☒ Yes

(4.12.1) Provide details on the information published about your organization's response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.

(4.12.1.1) Publication

Select from: ☒ In voluntary communications

(4.12.1.3) Environmental issues covered in publication

Select all that apply

☒ Climate change

☒ Water

☒ Biodiversity

(4.12.1.4) Status of the publication

Select from: ☒ Underway - previous year attached

(4.12.1.5) Content elements

Select all that apply

☒ Risks & Opportunities

☒ Emissions figures

☒ Strategy

☒ Emission targets

(4.12.1.6) Page/section reference

Whole document

(4.12.1.8) Comment

Voluntary reporting of 2024 fiscal year data can found in the 2025 Sustainability at Bank of America document (will be published in December), please refer to www.bankofamerica.com/sustainabilityreports .

C5. Business strategy

(5.11) Do you engage with your value chain on environmental issues?

	Engaging with this stakeholder on environmental issues	Environmental issues covered
Clients	Select from: <input checked="" type="checkbox"/> Yes	N/A
Suppliers	Select from: <input checked="" type="checkbox"/> Yes	Select all that apply <input checked="" type="checkbox"/> Climate change

(5.11.7) Provide further details of your organization's supplier engagement on environmental issues.

(5.11.7.2) Action driven by supplier engagement

Select from: ☒ Emissions reduction

(5.11.7.4) Upstream value chain coverage

Select from: ☒ Tier 1 suppliers

(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

Information collection: In 2024, we requested climate disclosures from 375 suppliers. Our goal is to encourage 70% of global suppliers, by spend, set GHG emissions reduction or renewable energy targets by 2030. As of 2024, we exceeded that goal with suppliers representing 76% of our global spend having greenhouse gas emissions reduction or renewable electricity procurement goals.

Capacity Building: In addition to achieving net zero in our operations, we are working to reach net zero across our supply chain. We set environmental expectations of our suppliers through our Supplier Expectations, to which we expect suppliers to adhere while conducting business with or on behalf of the Company. Our expectations, including those related to climate, are also reiterated in our contract templates, designed to foster supplier accountability. Additional approvals are required if suppliers wish to negotiate any changes to these terms. We monitor adherence with our Supplier Expectations by using a risk-based approach—reviewing policies and procedures of our highest spend suppliers prior to awarding and/or renewing contracts. Lines of business are accountable for selecting suppliers that can adhere to our Supplier Expectations. As a founding member of the CDP (formerly Carbon Disclosure Project) supply chain program, we have asked suppliers to respond to the CDP survey since 2009. This helps us understand the climate change impacts on our suppliers' businesses and associated risks related to our global supply chain. The data received from suppliers is used to monitor high spend suppliers' emissions and targets, calculate our supply chain emissions and track our progress toward net zero. To educate, upskill and support our suppliers in calculating and reporting emissions data and setting ambitious climate targets, we offer a variety of free resources, including webinars and individualized advisory services. We also provide suppliers with individualized feedback regarding their CDP survey response to facilitate an ongoing dialogue and promote collaboration.

(5.13) Has your organization already implemented any mutually beneficial environmental initiatives due to CDP Supply Chain member engagement?

	Environmental initiatives implemented due to CDP Supply Chain member engagement
	Select from: <input checked="" type="checkbox"/> No, and we do not plan to within the next two years.

C6. Environmental Performance - Consolidation Approach

(6.1) Provide details on your chosen consolidation approach for the calculation of environmental performance data.

Climate change

(6.1.1) Consolidation approach used

Select from: ☒ Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

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.

C7. Environmental performance - Climate Change

(7.1) Is this your first year of reporting emissions data to CDP?

Select from: ☒ No

(7.1.1) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

Has there been a structural change?
Select all that apply <input checked="" type="checkbox"/> No

(7.1.2) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

(7.1.2.1) Change(s) in methodology, boundary, and/or reporting year definition?

Select all that apply ☒ No

(7.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.

Select all that apply

- ☒ The Greenhouse Gas Protocol: Scope 2 Guidance
- ☒ The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard
- ☒ The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)
- ☒ US EPA Center for Corporate Climate Leadership: Indirect Emissions From Purchased Electricity
- ☒ US EPA Center for Corporate Climate Leadership: Direct Emissions from Mobile Combustion Sources
- ☒ US EPA Center for Corporate Climate Leadership: Direct Emissions from Stationary Combustion Sources
- ☒ US EPA Center for Corporate Climate Leadership: Direct Fugitive Emissions from Refrigeration, Air Conditioning, Fire Suppression, and Industrial Gases

(7.3) Describe your organization's approach to reporting Scope 2 emissions.

Scope 2, location-based	Scope 2, market-based
Select from: <input checked="" type="checkbox"/> We are reporting a Scope 2, location-based figure	Select from: <input checked="" type="checkbox"/> We are reporting a Scope 2, market-based figure.

(7.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure?

Select from: ☒ No

(7.5) Provide your base year and base year emissions.

Scope 1

(7.5.1) Base year end
12/31/2010

(7.5.2) Base year emissions (metric tons CO₂e)
106870

Scope 2 (location-based)

(7.5.1) Base year end
12/31/2010

(7.5.2) Base year emissions (metric tons CO₂e)
1678547

Scope 2 (market-based)

(7.5.1) Base year end
12/31/2010

(7.5.2) Base year emissions (metric tons CO₂e)
1644068

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.5.1) Base year end
12/31/2010

(7.5.2) Base year emissions (metric tons CO₂e)
341783

Scope 3 category 4: Upstream transportation and distribution

(7.5.1) Base year end
12/31/2010

(7.5.2) Base year emissions (metric tons CO₂e)
243881

Scope 3 category 6: Business travel

(7.5.1) Base year end
12/31/2010

(7.5.2) Base year emissions (metric tons CO₂e)
189977

Scope 3 category 7: Employee commuting

(7.5.1) Base year end
12/31/2010

(7.5.2) Base year emissions (metric tons CO₂e)
675193

Scope 3 category 9: Downstream transportation and distribution

(7.5.1) Base year end
12/31/2010

(7.5.3) Methodological details

Base year emissions Not Available

Scope 3 category 11: Use of sold products

(7.5.1) Base year end
12/31/2010

(7.5.3) Methodological details

Base year emissions Not Available

Scope 3 category 12: End of life treatment of sold products

(7.5.1) Base year end
12/31/2010

(7.5.3) Methodological details

Base year emissions Not Available

(7.6) What were your organization's gross global Scope 1 emissions in metric tons CO₂e?

	Gross global Scope 1 emissions (metric tons CO ₂ e)	End date
Reporting year	65,763	12/31/2024

(7.7) What were your organization's gross global Scope 2 emissions in metric tons CO₂e?

	Gross global Scope 2, location-based emissions (metric tons CO ₂ e)	Gross global Scope 2, market-based emissions (metric tons CO ₂ e) (if applicable)	End date
Reporting year	617,413	16,587	12/31/2024

(7.8) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.

Purchased goods and services

(7.8.1) Evaluation status

Select from: ☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO₂e)

1,625,076

(7.8.3) Emissions calculation methodology

Select all that apply: ☒ Supplier-specific method ☒ Spend-based method

(7.8.5) Please explain

Cradle-to-gate emissions from our purchased goods and services were calculated using a combination of two approaches. The first approach uses supplier-specific emission factors developed based on supplier emissions disclosures from CDP (reported Scopes 1, 2, & 3 emissions per company revenue). These factors were multiplied by BofA's spend with the supplier to calculate Scope 3 emissions. The second approach aggregates our total spend data into standard supplier sector categories. The spend in each category is multiplied by sector-specific cradle-to-gate emission factors. Emissions factors are from the US EPA Environmentally-Extended Input-Output (EEIO) database. GWPs are IPCC Fifth Assessment Report (AR5 - 100 year).

Capital goods

(7.8.1) Evaluation status

Select from: ☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO₂e)

35,375

(7.8.3) Emissions calculation methodology

Select all that apply: ☒ Supplier-specific method ☒ Spend-based method

(7.8.5) Please explain

Cradle-to-gate emissions from our capital goods were calculated using a combination of two approaches. The first approach uses supplier-specific emission factors developed based on supplier emissions disclosures from CDP (reported Scopes 1, 2, & 3 emissions per company revenue). These factors were multiplied by BofA's spend with the supplier to calculate Scope 3 emissions. The second approach aggregates our total spend data into standard supplier sector categories. The spend in each category is multiplied by sector-specific cradle-to-gate emission factors. Emissions factors are from the US EPA Environmentally-Extended Input-Output (EEIO) database. GWPs are IPCC Fifth Assessment Report (AR5 - 100 year).

Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.8.1) Evaluation status

Select from: ☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO₂e)

150,799

(7.8.3) Emissions calculation methodology

Select all that apply: ☒ Fuel-based method

(7.8.5) Please explain

The activity data used to quantify these activities' emissions are the quantity consumed of each energy type, such as electricity or natural gas. Consumption by fuel type is then multiplied by emission factors for each of the three activities included in this category. Emission factors for upstream emissions of purchased fuels are based on life-cycle analysis software. Emission factors for upstream emissions of purchased electricity are based on life-cycle analysis software for the U.S., and on International Energy Agency for other countries. Emission factors for transmission and distribution losses are location-based

and taken from EPA's eGRID database for the U.S., and on IEA for other countries. GWPs are IPCC Fifth Assessment Report (AR5 - 100 year).

Upstream transportation and distribution

(7.8.1) Evaluation status

Select from: ☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO₂e)

147,437

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Supplier-specific method

☒ Fuel-based method

☒ Average data method

☒ Distance-based method

☒ Spend-based method

(7.8.5) Please explain

This figure encompasses emissions from armored cars, check couriers, freight shipments, mail and express shipments, and vehicles owned by our facility management partners that are dedicated to serving our facilities. Activity data for the emission sources are obtained from the internal group that manages this transportation. Emissions were calculated using EPA Emission Factors for Greenhouse Gas Inventories and Climate Leaders Mobile Source Guidance. GWPs are IPCC Fifth Assessment Report (AR5 - 100 year).

Waste generated in operations

(7.8.1) Evaluation status

Select from: ☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO₂e)

19,090

(7.8.3) Emissions calculation methodology

Select all that apply: ☒ Waste-type-specific method

(7.8.5) Please explain

This figure represents emissions associated with waste disposed of via landfilling, incineration, composting, and recycling. It does not include wastewater treatment. Data on waste quantity, composition, and disposal method are obtained by our waste management providers. Emissions from waste are calculated using methodologies and emission factors from the EPA's Waste Reduction Model (WARM). This model calculates emissions based on a life-cycle analysis, including emissions from the long-term decomposition of waste in a landfill or from upstream sources/sinks. GWPs are IPCC Fifth Assessment Report (AR5 - 100 year).

Business travel

(7.8.1) Evaluation status

Select from: ☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO₂e)

96,359

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Supplier-specific method

☒ Fuel-based method

☒ Distance-based method

(7.8.5) Please explain

Business travel includes air and rail travel, rental cars, contracted black cars, and hotel stays. Air and rail travel activity data were obtained from the bank's travel agency. Rental car and contracted black car activity data is provided by rental car and contracted black car providers. Hotel data are aggregated by bank staff. Emissions were calculated using emission factors and methodologies from the Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting, EPA Emission Factors for Greenhouse Gas Inventories, Climate Leaders Mobile Source Guidance, Climate Leaders Business Travel and Commuting Guidance, and hotel brand specific emission factors. GWPs are IPCC Fifth Assessment Report (AR5 - 100 year).

Employee commuting

(7.8.1) Evaluation status

Select from: ☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO₂e)

314,706

(7.8.3) Emissions calculation methodology

Select all that apply: ☒ Distance-based method

(7.8.5) Please explain

Commuting emissions include emissions from employees' personal vehicles and from shuttles that transport employees to and from work. Commuting emissions for US and UK employees are based on calculations of distance from employees' homes to primary work location. US and UK averages were applied to other regions. The modes of transportation are based on employee surveys and on publicly available information. Shuttle emissions are calculated based on the miles travelled per shuttle type, amount of fuel consumed, and MPG when the amount of fuel was not available. Total emissions for each mode of transportation, plus the shuttle emissions, were calculated using emission factors and methodologies from EPA Emission Factors for Greenhouse Gas Inventories, Climate Leaders Mobile Source Guidance, Climate Leaders Business Travel and Commuting Guidance, and Guidelines to Defra / DECC's GHG Conversion Factors for Company Reporting. GWPs are IPCC Fifth Assessment Report (AR5 - 100 year). Commuting emissions also include work from home emissions. Calculations were completed using the number of employees working from home and the average electricity consumption of the models of laptops and monitors most frequently distributed to employees. Total emissions associated with laptops and monitors were calculated using the US average electricity emission factor from EPA eGRID.

Upstream leased assets

(7.8.1) Evaluation status

Select from: ☒ Not relevant, explanation provided

(7.8.5) Please explain

Under the operational control approach of defining our inventory boundary, emissions from all upstream leased assets are included in our Scope 1 and Scope 2 emissions.

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from: ☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO₂e)

1,000,000

(7.8.3) Emissions calculation methodology

Select all that apply: ☒ Distance-based method

(7.8.5) Please explain

This figure represents emissions associated with client travel to and from retail financial centers and ATMs. It currently does not include client travel to wealth management facilities or other facilities. Activity data used to quantify these emissions includes measured data on the number of teller and ATM visits and the average distance travelled to financial centers and ATMs. The mode of travel was assumed based on the availability of parking at facilities. Data were used to calculate total miles and gallons of gasoline consumed. Emissions were calculated using emission factors and methodologies from the EPA Emission Factors for Greenhouse Gas Inventories and Climate Leaders Mobile Source Guidance. GWPs are IPCC Fifth Assessment Report (AR5 - 100 year).

Processing of sold products

(7.8.1) Evaluation status

Select from: ☒ Not relevant, explanation provided

(7.8.5) Please explain

We have no emissions in this category because we do not sell intermediate products that require processing into final products.

Use of sold products

(7.8.1) Evaluation status

Select from: ☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO₂e)

2,000

(7.8.3) Emissions calculation methodology

Select all that apply: ☒ Average data method

(7.8.5) Please explain

This figure represents emissions associated with client use of computers and smartphones for mobile and online banking. The activity data used to quantify these emissions include tracking data on the number and length of online and mobile banking sessions. Based on research, assumptions were developed for the mix of laptop and desktop computers as well as tablets and smartphones. The total online time is used to calculate the amount of total electricity consumed, which is multiplied by the U.S. average eGRID location-based emission factor for electricity. Computer wattage values are based on data from the EPA and industry sources. GWPs are IPCC Fifth Assessment Report (AR5 - 100 year).

End of life treatment of sold products

(7.8.1) Evaluation status

Select from: ☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO₂e)

10,000

(7.8.3) Emissions calculation methodology

Select all that apply: ☒ Waste-type-specific method

(7.8.5) Please explain

This figure represents emissions associated with the disposal of credit and debit cards and client mailings. Activity data used to quantify emissions include the number and weight of cards issued and the total weight and type of paper for mailings. This figure represents emissions associated with waste disposed via landfilling, incineration, and recycling. Emissions from waste are calculated using methodologies and emission factors from the EPA's Waste Reduction Model (WARM). This model calculates emissions based on a life-cycle analysis, including emissions from the long-term decomposition of waste in a landfill or from upstream sources/sinks. GWPs are IPCC Fifth Assessment Report (AR5 - 100 year).

Downstream leased assets

(7.8.1) Evaluation status

Select from: ☒ Not relevant, explanation provided

(7.8.5) Please explain

Emissions in this category are insignificant, because we have an inconsequential amount of owned spaced that is leased to others.

Franchises

(7.8.1) Evaluation status

Select from: ☒ Not relevant, explanation provided

(7.8.5) Please explain

We do not operate any franchises.

(7.9) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	Select from: <input checked="" type="checkbox"/> Third-party verification or assurance process in place.
Scope 2 (location-based or market-based)	Select from: <input checked="" type="checkbox"/> Third-party verification or assurance process in place.
Scope 3	Select from: <input checked="" type="checkbox"/> Third-party verification or assurance process in place.

(7.9.1) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

(7.9.1.1) Verification or assurance cycle in place

Select from: ☒ Annual process

(7.9.1.2) Status in the current reporting year

Select from: ☒ Complete

(7.9.1.3) Type of verification or assurance

Select from: ☒ Reasonable assurance

(7.9.1.5) Page/section reference

Environmental assurance statement can be found at www.bankofamerica.com/sustainabilityreports.

(7.9.1.6) Relevant standard

Select from: ☒ ISEA 3000

(7.9.1.7) Proportion of reported emissions verified (%)

100

(7.9.2) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.

(7.9.2.1) Scope 2 approach

Select from: ☒ Scope 2 location-based

(7.9.2.2) Verification or assurance cycle in place

Select from: ☒ Annual process

(7.9.2.3) Status in the current reporting year

Select from: ☒ Complete

(7.9.2.4) Type of verification or assurance

Select from: ☒ Reasonable assurance

(7.9.2.6) Page/ section reference

Environmental assurance statement can be found at www.bankofamerica.com/sustainabilityreports.

(7.9.2.7) Relevant standard

Select from: ☒ ISEA 3000

(7.9.2.8) Proportion of reported emissions verified (%)

100

(7.9.2.1) Scope 2 approach

Select from: ☒ Scope 2 market-based

(7.9.2.2) Verification or assurance cycle in place

Select from: ☒ Annual process

(7.9.2.3) Status in the current reporting year

Select from: ☒ Complete

(7.9.2.4) Type of verification or assurance

Select from: ☒ Reasonable assurance

(7.9.2.6) Page/ section reference

Environmental assurance statement can be found at www.bankofamerica.com/sustainabilityreports.

(7.9.2.7) Relevant standard

Select from: ☒ ISEA 3000

(7.9.2.8) Proportion of reported emissions verified (%)

100

(7.9.3) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.

(7.9.3.1) Scope 3 category

Select all that apply

☒ Scope 3: Investments

☒ Scope 3: Processing of sold products

☒ Scope 3: Capital goods

☒ Scope 3: Purchased goods and services

☒ Scope 3: Business travel

☒ Scope 3: Waste generated in operations

☒ Scope 3: Employee commuting

☒ Scope 3: End-of-life treatment of sold products

☒ Scope 3: Use of sold products

☒ Scope 3: Upstream transportation and distribution

☒ Scope 3: Downstream transportation and distribution

☒ Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)

(7.9.3.2) Verification or assurance cycle in place

Select from: ☒ Annual process

(7.9.3.3) Status in the current reporting year

Select from: ☒ Complete

(7.9.3.4) Type of verification or assurance

Select from: ☒ Limited assurance

(7.9.3.6) Page/section reference

Environmental assurance statement can be found at www.bankofamerica.com/sustainabilityreports.

(7.9.3.7) Relevant standard

Select from: ☒ ISEA 3000

(7.9.3.8) Proportion of reported emissions verified (%)

100

(7.10) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Select from: ☒ Decreased

(7.10.2) Are your emissions performance calculations in 7.10 and 7.10.1 based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Select from: ☒ Market-based

(7.23) Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?

Select from: ☒ No

(7.27) What are the challenges in allocating emissions to different customers, and what would help you to overcome these challenges?

(7.27.1) Allocation challenges

Select from: ☒ Other, please specify: We utilize revenue to allocate emissions which is the most appropriate approach

(7.28) Do you plan to develop your capabilities to allocate emissions to your customers in the future?

(7.28.1) Do you plan to develop your capabilities to allocate emissions to your customers in the future?

Select from: ☒ No

(7.28.4) Explain why you do not plan to develop capabilities to allocate emissions to your customers
We anticipate that the economic allocation approach that we currently use to allocate emissions to clients will be the most appropriate approach for the foreseeable future.

(7.30) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired electricity	Select from: <input checked="" type="checkbox"/> Yes

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of purchased or acquired steam	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired cooling	Select from: <input checked="" type="checkbox"/> Yes

(7.30.1) Report your organization's energy consumption totals (excluding feedstocks) in MWh.

	MWh from renewable sources	MWh from non-renewable sources	Total (renewable and non-renewable) MWh
Consumption of purchased or acquired electricity	1,826,919	0	1,826,919

(7.53) Did you have an emissions target that was active in the reporting year?

Select all that apply: ☒ Absolute target ☒ Portfolio target

(7.53.1) Provide details of your absolute emissions targets and progress made against those targets.

(7.53.1.1) Target reference number

Select from: ☒ Abs 1

(7.53.1.5) Date target was set

09/19/2016

(7.53.1.6) Target coverage

Select from: ☒ Organization-wide

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☒ Carbon dioxide (CO₂)

☒ Nitrous oxide (N₂O)

☒ Methane (CH₄)

☒ Hydrofluorocarbons (HFCs)

(7.53.1.8) Scopes

Select all that apply: ☒ Scope 1 ☒ Scope 2

(7.53.1.9) Scope 2 accounting method

Select from:

☒ Market-based

(7.53.1.11) End date of base year

12/31/2010

(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO₂e)

106870

(7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO₂e)

1,644,068

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO₂e)

0.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO₂e)

1750939.000

(7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

1
100

(7.53.1.34) Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2

2

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

(7.53.1.54) End date of target

12/31/2030

(7.53.1.55) Targeted reduction from base year (%)

100

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO₂e)

0.000

(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO₂e)

0

(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO₂e)

0

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO₂e)

0.000

(7.53.1.78) Land-related emissions covered by target

Select from: ☒ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.1.79) % of target achieved relative to base year

100.00

(7.53.1.80) Target status in reporting year

Select from: ☒ Underway

(7.53.1.82) Explain target coverage and identify any exclusions

In 2019, we reached our goal of becoming carbon neutral for Scope 1 and 2 emissions, one year ahead of our plan. We have now extended this goal to maintain carbon neutrality through 2030. In addition, as of 2020, we have offset our Scope 3 GHG emissions from business travel.

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

To reach this goal, we started by reducing our location-based emissions by 62% since 2010. Second, we have focused on purchasing renewable energy 102% in a way that supports new solar and wind. This is achieved by generating renewable electricity onsite and by engaging in long-term agreements to procure renewable electricity. Finally, for residual emissions we purchased high quality, certified carbon credits in each region in which we operate.

(7.53.1.1) Target reference number

Select from: ☒ Abs 2

(7.53.1.5) Date target was set

02/11/2021

(7.53.1.6) Target coverage

Select from: ☒ Organization-wide

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

☒ Carbon dioxide (CO₂)

☒ Nitrous oxide (N₂O)

☒ Methane (CH₄)

☒ Hydrofluorocarbons (HFCs)

(7.53.1.8) Scopes

Select all that apply: ☒ Scope 1 ☒ Scope 2

(7.53.1.9) Scope 2 accounting method

Select from: ☒ Location-based

(7.53.1.11) End date of base year

12/31/2010

(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO₂e)

106870

(7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO₂e)

1678547

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO₂e)

0.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO₂e)

1785417.000

(7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope

1

100

(7.53.1.34) Base year Scope 2 emissions covered by target as % of total base year emissions in Scope

2

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

(7.53.1.54) End date of target

12/31/2030

(7.53.1.55) Targeted reduction from base year (%)

75

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO₂e)

446354.250

(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO₂e)

65,763

(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO₂e)

617,413

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO₂e)

683,176

(7.53.1.79) % of target achieved relative to base year

Auto-calculated 82.314

(7.53.1.80) Target status in reporting year

Select from: ☒ Underway

(7.53.1.82) Explain target coverage and identify any exclusions

In tandem with the carbon neutrality goal, we have a goal to reduce our location-based emissions by 75% by 2030.

(7.53.1.83) Target objective

To reach this goal, we started by reducing our location-based emissions by 62% since 2010. Second, we have focused on purchasing renewable electricity in a way that supports new solar and wind. This is achieved by generating renewable electricity onsite and by engaging in long-term agreements to procure renewable electricity.

(7.54) Did you have any other climate-related targets that were active in the reporting year?

Select all that apply

☒ Targets to increase or maintain low-carbon energy consumption or production

☒ Net-zero targets

☒ Other climate-related targets

(7.54.1) Provide details of your targets to increase or maintain low-carbon energy consumption or production.

(7.54.1.1) Target reference number

Select from: ☒ Low 1

(7.54.1.2) Date target was set

09/19/2016

(7.54.1.3) Target coverage

Select from: ☒ Organization-wide

(7.54.1.4) Target type: energy carrier

Select from: ☒ Electricity

(7.54.1.5) Target type: activity

Select from: ☒ Consumption

(7.54.1.6) Target type: energy source

Select from: ☒ Low-carbon energy source(s)

(7.54.1.7) End date of base year

12/31/2010

(7.54.1.8) Consumption or production of selected energy carrier in base year (MWh)

3302505

(7.54.1.9) % share of low-carbon or renewable energy in base year

1

(7.54.1.10) End date of target

12/31/2030

(7.54.1.11) % share of low-carbon or renewable energy at end date of target

100

(7.54.1.12) % share of low-carbon or renewable energy in reporting year

100

(7.54.1.13) % of target achieved relative to base year

100

(7.54.1.14) Target status in reporting year

Select from: ☒ Underway

(7.54.1.17) Is this target part of an overarching initiative?

Select all that apply: ☒ No, it's not part of an overarching initiative

(7.54.1.19) Explain target coverage and identify any exclusions

Purchase 100% of electricity globally from zero-carbon sources.

(7.54.1.21) Plan for achieving target, and progress made to the end of the reporting year

We have focused on purchasing zero-carbon electricity in a way that supports solar and wind development. In 2019 we reached this goal, one year ahead of our plan, and have extended this target through 2030. This is achieved by generating renewable electricity onsite and by engaging in long-term agreements to procure renewable electricity. We have executed a variety of deals across the U.S. We partnered with Duke Energy, NRG Energy, 3Degrees, Pine Gate Renewables, NativeEnergy and Birdseye Renewable Energy to support 10 new utility-scale solar projects across three states, including North Carolina, home to the company's headquarters. Additionally, we plan to require that any new solar deals support enhanced perennial vegetation that facilitates increased ecological services and environmental benefits including healthy habitats for pollinators.

(7.54.2) Provide details of any other climate-related targets, including methane reduction targets.

(7.54.2.1) Target reference number

Select from: ☒ Oth 1

(7.54.2.2) Date target was set

02/11/2021

(7.54.2.3) Target coverage

Select from: ☒ Organization-wide

(7.54.2.4) Target type: absolute or intensity

Select from: ☒ Absolute

(7.54.2.5) Target type: category & Metric (target numerator if reporting an intensity target)

Energy consumption or efficiency: ☒ GJ

(7.54.2.7) End date of base year

12/31/2010

(7.54.2.8) Figure or percentage in base year

13916433

(7.54.2.9) End date of target

12/31/2030

(7.54.2.10) Figure or percentage at end of date of target

6262395

(7.54.2.11) Figure or percentage in reporting year

7,710,631

(7.54.2.12) % of target achieved relative to base year

Auto-calculated 81.0787979

(7.54.2.13) Target status in reporting year

Select from: ☒ Underway

(7.54.2.15) Is this target part of an emissions target?

Abs2

(7.54.2.16) Is this target part of an overarching initiative?

Select all that apply: ☒ No, it's not part of an overarching initiative

(7.54.2.18) Please explain target coverage and identify any exclusions

Reduce energy use by 55% by 2030 from a 2010 baseline.

(7.54.2.20) Plan for achieving target, and progress made to the end of the reporting year

We have reduced our energy use by 45% since 2010. We expect to implement a combination of site upgrades, adopt more efficient technologies and systems, and continue to integrate energy efficiency into new facilities.

(7.54.2.1) Target reference number

Select from: ☒ Oth 2

(7.54.2.2) Date target was set

02/11/2021

(7.54.2.3) Target coverage

Select from: ☒ Organization-wide

(7.54.2.4) Target type: absolute or intensity

Select from: ☒ Absolute

(7.54.2.5) Target type: category & Metric (target numerator if reporting an intensity target)

Low-carbon buildings

☒ Percentage of buildings with a green building certificate

(7.54.2.7) End date of base year

12/31/2010

(7.54.2.8) Figure or percentage in base year

10

(7.54.2.9) End date of target

12/31/2030

(7.54.2.10) Figure or percentage at end of date of target

40

(7.54.2.11) Figure or percentage in reporting year

33%

(7.54.2.12) % of target achieved relative to base year

Auto-calculated 76.6666667

(7.54.2.13) Target status in reporting year

Select from: ☒ Underway

(7.54.2.15) Is this target part of an emissions target?

No

(7.54.2.16) Is this target part of an overarching initiative?

Select all that apply: ☒ No, it's not part of an overarching initiative

(7.54.2.18) Please explain target coverage and identify any exclusions

Manage facilities responsibly and achieve LEED certification (or comparable) for 40% of building space. This target covers all our global operations.

(7.54.2.20) Plan for achieving target, and progress made to the end of the reporting year

As of 2024, we have reached 33% of our portfolio with LEED or comparable certifications.

(7.54.2.1) Target reference number

Select from: ☒ Oth 3

(7.54.2.2) Date target was set

02/11/2021

(7.54.2.3) Target coverage

Select from:

☒ Organization-wide

(7.54.2.4) Target type: absolute or intensity

Select from: ☒ Absolute

(7.54.2.5) Target type: category & Metric (target numerator if reporting an intensity target)

Engagement with suppliers

☒ Other engagement with suppliers, please specify : Goal to encourage 70% of global suppliers, by spend, set GHG emissions reduction or renewable energy targets.

(7.54.2.7) End date of base year

12/31/2019

(7.54.2.8) Figure or percentage in base year

44

(7.54.2.9) End date of target

12/31/2030

(7.54.2.10) Figure or percentage at end of date of target

70

(7.54.2.11) Figure or percentage in reporting year

76%

(7.54.2.12) % of target achieved relative to base year

Auto-calculated 123.0769231

(7.54.2.13) Target status in reporting year

Select from: ☒ Underway

(7.54.2.15) Is this target part of an emissions target?

No

(7.54.2.16) Is this target part of an overarching initiative?

Select all that apply

☒ No, it's not part of an overarching initiative

(7.54.2.18) Please explain target coverage and identify any exclusions

Encourage 70% of global suppliers, by spend, set GHG emissions reduction or renewable energy targets

(7.54.2.20) Plan for achieving target, and progress made to the end of the reporting year

We have achieved 76% of our supply chain spend with suppliers who report GHG or renewable energy targets.

(7.54.3) Provide details of your net-zero target(s).

(7.54.3.1) Target reference number

Select from: ☒ NZ1

(7.54.3.2) Date target was set

02/11/2021

(7.54.3.3) Target Coverage

Select from: ☒ Organization-wide

(7.54.3.4) Targets linked to this net zero target

Select all that apply: ☒ Abs1 ☒ Abs3

(7.54.3.5) End date of target for achieving net zero

12/31/2050

(7.54.3.8) Scopes

Select all that apply

☒ Scope 1

☒ Scope 2

☒ Scope 3

(7.54.3.9) Greenhouse gases covered by target

Select all that apply

☒ Carbon dioxide (CO₂)

☒ Nitrous oxide (N₂O)

☒ Methane (CH₄)

☒ Hydrofluorocarbons (HFCs)

(7.54.3.10) Explain target coverage and identify any exclusions

To further guide our work, the company set a goal to achieve net zero emissions across our financing activities, operations and supply chain before 2050 and established interim 2030 targets to help us monitor near-term progress. Over the past decade, the company has set 2030 operational targets and has developed approaches to manage and reduce the environmental impacts of our activity across all scopes and categories of GHG emissions. The company has set voluntary 2030 physical unit emissions intensity targets for financing activity for the following sectors: auto manufacturing, aviation, cement, energy, iron & steel, maritime shipping, and power generation.

(7.54.3.12) Do you intend to neutralize any residual emissions with permanent carbon removals at the end of the target?

Select from: ☒ Yes

(7.54.3.17) Target status in reporting year

Select from: ☒ Underway

(7.73) Are you providing product level data for your organization's goods or services?

Select from: ☒ No, I am not providing data

(7.79) Has your organization canceled any project-based carbon credits within the reporting year?

Select from: ☒ Yes

(7.79.1) Provide details of the project-based carbon credits canceled by your organization in the reporting year.

(7.79.1.3) Project description

Credits are sourced from a variety of projects: Uberlandia I and II Landfill Gas Project in Brazil, Bondhu Chula Cookstoves and Gas Distribution Leak Reduction in Bangladesh, India Green Bricks for Residential and Commercial Buildings in India, Northern Kenya Grasslands in Kenya, Advanced Refrigeration in the United States, Delta Blue Carbon in Pakistan, Ciudad Juarez Landfill Gas in Mexico, Comunidad San Jeronimo Coatlan in Mexico, Indigo Soil Carbon in the United States, Clean Ethanol in Kenya, and Bonos Comunitarios CO2-El Naranjal in Mexico.

C13. Further information & sign off

(13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?

Other environmental information included in your CDP response is verified and/or assured by a third party
Select from: <input checked="" type="checkbox"/> Yes

(13.1.1) Which data points within your CDP response are verified and/or assured by a third party, and which standards were used?

(13.1.1.1) Environmental issue for which data has been verified and/or assured

Select all that apply: ☒ Climate change

(13.1.1.2) Disclosure module and data verified and/or assured

- | | |
|--|---|
| <input checked="" type="checkbox"/> Environmental performance – Climate change | <input checked="" type="checkbox"/> Other data point in module 7, please specify :Volume withdrawn from areas with water stress (megaliters) Water consumption– total volume Water withdrawals– total volumes |
| <input checked="" type="checkbox"/> Electricity/Steam/Heat/Cooling consumption | |
| <input checked="" type="checkbox"/> Fuel consumption | |
| <input checked="" type="checkbox"/> Renewable Electricity/Steam/Heat/Cooling consumption | |
| <input checked="" type="checkbox"/> Waste data | |

(13.1.1.3) Verification/assurance standard

Climate change-related standards: ☒ ISAE 3000

(13.1.1.4) Further details of the third-party verification/assurance process

We receive an annual verification of sustainability metrics for our environmental reporting.

(13.3) Provide the following information for the person that has signed off (approved) your CDP response.

(13.3.1) Job title: Chief Sustainability Officer (CSO)

(13.3.2) Corresponding job category

Select from: ☒ Chief Sustainability Officer (CSO)