

ENVIRONMENTAL ASSURANCE STATEMENTS: OPERATIONS AND FINANCED EMISSIONS

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ENVIRONMENTAL ASSURANCE STATEMENT

INDEPENDENT REASONABLE AND LIMITED ASSURANCE STATEMENT

To: The Stakeholders of Bank of America

Introduction and objectives of work

Apex Companies, LLC (Apex) has been engaged by Bank of America to provide assurance of selected environmental data reported in its 2025 Sustainability at Bank of America document (the Report). This assurance statement applies to the Subject Matter included within the scope of work described below.

The Subject Matter information and its presentation in the 2025 Sustainability at Bank of America document are the sole responsibility of the management of Bank of America. Apex was not involved in the drafting of the Report. Our sole responsibility was to provide independent assurance on the accuracy of the Subject Matter. This is the tenth year in which we have provided assurance over Bank of America's selected environmental data.

Scope of work

The scope of our work was limited to assurance over the following information included within the Report for the period of January 1, 2024 through December 31, 2024 (the 'Subject Matter'):

- Reasonable Assurance of the environmental data and information included in the Report for the calendar year 2024 reporting period, specifically:
 - Materials (Total quantities procured and percentage of recycled input materials - paper)
 - Energy (Direct and Indirect consumption; Energy saved due to conservation; Initiatives to provide energy-efficient or renewable energy-based products; Carbon neutrality; and initiatives to reduce indirect energy consumption)
 - Water (Total withdrawal and volume recycled; initiatives to reduce consumption, withdrawal and consumption from water stressed areas)
 - Air Emissions (Greenhouse Gas (GHG) emissions: Direct Scope 1 and Indirect Scope 2 emissions by weight, by country and by region; Emissions of ozone-depleting substances by weight; Initiatives to reduce greenhouse gas emissions and reductions achieved; Nitrous Oxides (NOx) emitted; Sulfur Oxides (SOx) emitted; and other significant air emissions)
 - Waste quantities and disposition
 - Total number and volume of significant spills
 - Compliance (Monetary value of significant fines for non-compliance with environmental laws and regulations and amount spent on environmental compliance)
 - Transport (Significant environmental impact of transporting products and other goods and materials used for the organization's operations, and transporting members of the workforce)
- Limited Assurance of Scope 3 GHG emissions and select environmental data and information included in the Report for the calendar year 2024 reporting period, specifically:

- Optional Scope 3 GHG emissions related to purchased goods and services; capital goods; fuel and energy related activities; upstream transportation and distribution; waste disposal; business travel; employee commuting; downstream transportation and distribution; use of sold products; and end of life treatment of sold products
- Other Metrics (Societal impacts of air pollution and GHG emissions, Sustainable Aviation Fuel (SAF) usage and investment, Supplier CDP Engagement and sites in areas protected for biodiversity)
- Appropriateness and robustness of underlying reporting systems and processes, used to collect, analyze and review the information reported;
- Evaluation of the reported data against the principles of the Global Reporting Initiative (GRI) Reporting Framework as defined in the GRI Sustainability Reporting Standards, Core Option.

Reporting Criteria

The Subject Matter needs to be read and understood together with the Bank of America's Inventory Management Plan which is based on the Global Reporting Initiative (GRI) Standards, descriptions of the Subject Matter in the Report and the GRI Standards.

Limitations and Exclusions

Excluded from the scope of our work is any assurance of information relating to:

- Activities outside the defined assurance period;
- Text or other written statements associated with the Report; and
- Financial information that is audited by others.

This limited and reasonable assurance engagement relies on a risk based selected sample of sustainability data and the associated limitations that this entails. This independent statement should not be relied upon to detect all errors, omissions or misstatements that may exist.

Responsibilities

The preparation and presentation of the Subject Matter in the Report are the sole responsibility of the management of Bank of America.

Apex was not involved in the drafting of the Report or of the Reporting Criteria. Our responsibilities were to:

- Obtain limited or reasonable assurance about whether the Subject Matter has been prepared in accordance with the Reporting Criteria;
- Form an independent conclusion based on the assurance procedures performed and evidence obtained; and
- Report our conclusions to the Directors of Bank of America.

Assessment Standards

We performed our work in accordance with Apex’s standard procedures and guidelines for external Assurance of Sustainability Reports and International Standard on Assurance Engagements (ISAE) 3000 Revised, Assurance Engagements Other than Audits or Reviews of Historical Financial Information (effective for assurance reports dated on or after Dec. 15, 2015), issued by the International Auditing and Assurance Standards Board. A materiality threshold of ±5-percent was set for the assurance process.

Summary of Work Performed

As part of our independent assurance, our work included:

- 1. Assessing the appropriateness of the Reporting Criteria for the Subject Matter;
- 2. Conducting interviews with relevant personnel of Bank of America, their contractors and consultants;
- 3. Reviewing the data collection and consolidation processes used to compile the Subject Matter, including assessing assumptions made, and the data scope and reporting boundaries;
- 4. Reviewing documentary evidence provided by Bank of America, their contractors and consultants;
- 5. Agreeing a selection of the Subject Matter to the corresponding source documentation;
- 6. Reviewing Bank of America systems for quantitative data aggregation and analysis;
- 7. Assessing the disclosure and presentation of the Subject Matter to ensure consistency with assured information;
- 8. Conducting a review during a meeting with Bank of America headquarters personnel and consultants in Charlotte, North Carolina to review methods for Subject Matter compilation and management;
- 9. Reperforming a selection of aggregation calculations of the Subject Matter; and
- 10. Comparing the Subject Matter information to the prior year amounts taking into consideration changes in business activities, acquisitions and disposals.

Conclusion

On the basis of our methodology and the activities described above, it is our opinion that:

- Bank of America’s Scopes 1 and 2 (location- and market-based) GHG emissions, water, waste and other information subject to reasonable assurance is presented in accordance with the Reporting Criteria and is, in all material respects, fairly stated (Reasonable);
- Nothing has come to our attention to indicate that the Scope 3 GHG emissions, environmental and other information subject to limited assurance are not fairly stated in all material respects (Limited); and
- It is our opinion that Bank of America has established appropriate systems for the collection, aggregation and analysis of Subject Matter (e.g., quantitative data including Scope 1, Scope 2, and Scope 3 GHG emission, and other select environmental and sustainability metrics).

The assured information is summarized in the attached table.

Statement of Independence, Integrity and Competence

Apex is an independent professional services company that specializes in Health, Safety, Social and Environmental management services including assurance with over 30 years history in providing these services.

Apex has implemented a Code of Ethics across the business to maintain high ethical standards among staff in their day-to-day business activities.

No member of the assurance team has a business relationship with Bank of America, its Directors or Managers beyond that required of this assignment. We have conducted this assurance independently, and there has been no conflict of interest.

The assurance team has extensive experience in conducting assurance over environmental, social, ethical and health and safety information, systems and processes, has over 20 years combined experience in this field and an excellent understanding of Apex’s standard methodology for the assurance of sustainability related assertions.



John A. Rohde, Lead Verifier
Apex Companies, LLC
Lakewood, Colorado



David Reilly, Technical Reviewer
Apex Companies, LLC
Santa Ana, California

November 21, 2025

This assurance statement, including the opinion expressed herein, is provided to Bank of America and is solely for the benefit of Bank of America in accordance with the terms of our agreement. We consent to the release of this statement by you to the public or other organizations, but without accepting or assuming any responsibility or liability on our part to any other party who may have access to this statement.

ASSURED DATA CALENDAR YEAR 2024

Energy		
Electricity	6,576,907	GJ
Other Indirect (purchased steam and cooling)	114,032	GJ
Natural Gas	640,398	GJ
Other Direct (fuel oil, jet fuel, gasoline, diesel fuel, propane)	379,294	GJ
Total Energy	7,710,631	GJ
Energy Saved Due to Conservation (Projected)	38,966	GJ
Electricity From Renewable Sources		
Total Renewable and Non-Renewable Electricity Consumption	1,826,919	MWh
Total Renewable Electricity Procured	1,869,208	MWh
% of Total Electricity Procured From Renewable Sources	102	%
Water		
Total Withdrawal	1.59	Billion US Gallons
Total Potable Water Withdrawal	1.57	Billion US Gallons
Total Consumption	0.37	Billion US Gallons
Total Withdrawal in Water-stressed Areas	3,242	Megaliters
Total Consumption in Water-stressed Areas	746	Megaliters
Water Saved Due to Conservation (Projected)	10,354	Thousand US Gallons
Waste Quantities and Disposition		
e-Waste Disposed through Certified Suppliers	100	%
Non-Hazardous Waste (Landfill & Incineration)	30,910	Metric Tons
Non-Hazardous Waste (Recycling & Compost)	54,853	Metric Tons
Construction & Demolition Waste (Landfill & Incineration)	5,359	Metric Tons
Construction & Demolition Waste (Recycling, Reuse & Salvage)	17,247	Metric Tons
Construction & Demolition Waste - Landfill Diversion Rate	76	%
Hazardous, Universal, Used Oil & Asbestos Waste (Landfill & Incineration)	0.025	Metric Tons
Hazardous, Universal, Used Oil & Asbestos Waste (Recycling, Reuse & Salvage)	765	Metric Tons
Total Waste	86,528	Metric Tons

NOx, SOx, and Other Significant Air Emissions from Direct Combustion		
Emissions of Ozone-Depleting Substances	2	Metric tons CGC-11e
Nitrous Oxides (NOx)	16	Metric Tons
Sulfur Oxides (SOx)	1	Metric Tons
Volatile Organic Compounds (VOCs)	2	Metric Tons
Particulate Matter (PM)	2	Metric Tons
Carbon Monoxide (CO)	23	Metric Tons
Valued Societal Impact of Air Pollution	\$113,000	USD
Facilities		
LEED® (or comparable) certifications	21,423,471	Net square feet
LEED® (or comparable) certifications percent of total square footage	33	%
Sites in areas protected for biodiversity	8	Sites
Area of buildings in areas protected for biodiversity	6,580	Square meters

Greenhouse Gas Emissions by Region					
Region	Scope 1 Direct Emissions (tCO ₂ e)	Scope 2 Indirect Emissions Location-Based (tCO ₂ e)	Scope 2 Indirect Emissions Market-Based (tCO ₂ e)	Total Scope 1 and 2 Emissions Location-Based (tCO ₂ e)	Total Scope 1 and 2 Emissions Market-Based (tCO ₂ e)
U.S. and Canada	62,095	485,498	4,190	547,592	66,284
Asia Pacific	838	110,470	12,162	111,308	13,000
EMEA	2,783	20,141	235	22,924	3,018
Latin America	48	1,304	-	1,351	48
Country					
United States	61,981	485,364	4,190	547,345	66,171
India	511	81,455	355	81,965	866
United Kingdom	1,925	17,337	-	19,261	1,925
China	87	9,231	267	9,318	354
Japan	54	5,683	-	5,736	54
Singapore	40	7,303	7,303	7,343	7,343
Australia	14	1,970	1,028	1,984	1,042
Taiwan	20	1,916	1,916	1,936	1,936
South Korea	65	1,270	1,270	1,335	1,335
Ireland	558	647	0	1,205	558

Materials - Paper		
Total Paper	25,719	Metric Tons
Recycled Input Materials by Weight	15	%
Certified Materials by Weight	98.3	%
Transportation		
Support Production and Use of SAF (Cumulative since 2022)	6.9	Million Gallons
Percent of jet fuel usage utilizing SAF for annual corporate and commercial jet fuel usage	33	%
Mobilize sustainable finance investment for the production of SAF and other low-carbon aviation (Cumulative since 2022)	\$0.4	Billion USD
Supplier Engagement		
Response rate to climate disclosure requests	91	%
Suppliers asked to disclose climate data	375	
% of spend with suppliers who report GHG or renewable energy targets	76	%
Spend with suppliers assessed for risks as outlined by our Supplier Expectations	89	%
Compliance		
Monetary value of significant fines for non-compliance with environmental laws and regulations	\$0	USD
Non-monetary Violations	1	
Total Environmental Protection Spend	\$22,100,000	USD
Carbon Credits		
Avoidance Carbon Credits Retired	102,340	tCO ₂ e
Removal Carbon Credits Retired	76,369	tCO ₂ e
Total Carbon Credits Retired	178,709	tCO ₂ e
Valued Societal Impact of GHG Emissions	775,964,000	USD

Total Number and Volume of Significant Releases		
Number of Releases	1	Qty
Volume of Reportable Releases (Petroleum Products)	0	Gallons
Amount of Reportable Releases (Refrigerant)	114	lbs
Emissions		
Scope 1 GHG Emissions	65763	tCO ₂ e
Scope 2 GHG Location-Based Emissions	617413	tCO ₂ e
Scope 2 GHG Market-Based Emissions	16587	tCO ₂ e
Scope 1 and 2 Carbon Credits Retired	82350	tCO ₂ e
Total Net Scope 1 and Market-Based Scope 2 Emissions	0	tCO ₂ e
Scope 3 GHG Emissions		
Purchased Goods and Services	1625076	tCO ₂ e
Capital Goods	35375	tCO ₂ e
Fuel- and Energy-Related Activities	150799	tCO ₂ e
Upstream Transportation and Distribution	147437	tCO ₂ e
Waste (Traditional Disposal)	19090	tCO ₂ e
Gross Business Travel	96359	tCO ₂ e
Business Travel Carbon Credits Retired	96359	tCO ₂ e
Net Business Travel	0	tCO ₂ e
Employee Commuting	314706	tCO ₂ e
Downstream Transportation and Distribution	1000000	tCO ₂ e
Use of Sold Products	2000	tCO ₂ e
End of Life Treatment of Sold Products	10000	tCO ₂ e



FINANCED EMISSIONS VERIFICATION STATEMENT

VERIFICATION OPINION DECLARATION GREENHOUSE GAS EMISSIONS

To: The Stakeholders of Bank of America,

Apex Companies, LLC (Apex) was engaged to conduct an independent verification of the greenhouse gas (GHG) emissions reported by Bank of America for the period stated below. This verification opinion declaration applies to the related information included within the scope of work described below.

The determination of the GHG emissions is the sole responsibility of Bank of America. Bank of America is responsible for the preparation and fair presentation of the GHG emissions statement in accordance with the criteria. Apex’s sole responsibility was to provide independent verification on the accuracy of the GHG emissions reported and on the underlying systems and processes used to collect, analyze and review the information. Apex is responsible for expressing an opinion on the GHG emissions statement based on the verification.

Boundaries of the reporting company GHG emissions covered by the verification:

- Operational Control
- Financed Emissions (auto manufacturing, aviation, cement, energy, iron and steel, maritime [asset specific] and power sectors utilized amounts only)
- Physical Intensities (auto manufacturing, aviation, cement, energy, iron and steel and power sectors committed amounts)

Type of GHGs: CO₂, N₂O, CH₄, Refrigerants

GHG Emissions Statement:

- Scope 3 – Investments:

Category	Units	Utilized	Data Quality
Absolute Total Financed Emissions (Auto Manufacturing)	Thousand Metric tons CO ₂ e	694	2.0* 2.0**
Absolute Total Financed Emissions (Aviation includes Scope 1)	Thousand Metric tons CO ₂ e	3,749	2.8
Absolute Total Financed Emissions (Cement includes Scope 1 and 2)	Thousand Metric tons CO ₂ e	1,678	2.3
Absolute Total Financed Emissions (Energy - Oil and Gas Refiners and Producers includes Scope 1 and 2)	Thousand Metric tons CO ₂ e	1,595	2.7

Absolute Total Financed Emissions (Energy - Oil and Gas Refiners and Producers includes Scope 3.11)	Thousand Metric tons CO ₂ e	16,671	3.3
Absolute Total Financed Emissions (Energy - Other includes Scope 1 and 2)	Thousand Metric tons CO ₂ e	2,111	3.7
Absolute Total Financed Emissions (Iron and Steel includes Scope 1 and 2)	Thousand Metric tons CO ₂ e	2,218	2.3
Absolute Total Financed Emissions (Power Generation - Scope 1 only)	Thousand Metric tons CO ₂ e	4,100	2.6

*Scope 1 and 2
**Scope 3

Category	Units	Portfolio Alignment Score	Data Quality
Vessel – Level Commercial Shipping (Scope 1 CO ₂) ¹	Well-Wake, Minimum / Well-Wake, Striving	14%/21%	2.0

¹ Poseidon Principles via 2023 Initial IMO GHG Strategy

Category	Units	Utilized
Economic Intensity (Auto Manufacturing includes Scope 1, 2 and 3)	Metric tons CO ₂ e/ Million USD exposure	734
Economic Intensity (Aviation includes Scope 1)	Metric tons CO ₂ e/ Million USD exposure	848
Economic Intensity (Cement includes Scope 1 and 2)	Metric tons CO ₂ e/ Million USD exposure	2,865
Economic Intensity (Energy - Oil and Gas Refiners and Producers includes Scope 1, 2 and 3)	Metric tons CO ₂ e/ Million USD exposure	2,936
Economic Intensity (Energy – Other includes Scope 1 and 2)	Metric tons CO ₂ e/ Million USD exposure	462
Economic Intensity (Iron and Steel includes Scope 1 and 2)	Metric tons CO ₂ e/Million USD exposure	1,959
Economic Intensity (Power Generation - Scope 1 only)	Metric tons CO ₂ e/ Million USD exposure	193

Category	Units	Intensity
Physical Intensity (Auto Manufacturing)	g CO ₂ e/km	184.5
Physical Intensity (Aviation includes Scope 1)	gCO ₂ e/RTK	832.6
Physical Intensity (Cement includes Scope 1 and 2)	tCO ₂ e/tCP	0.660
Physical Intensity (Energy – Oil and Gas Refiners and Producers includes Scope 1, 2)	g CO ₂ e/MJ	5.8
Physical Intensity (Energy – Oil and Gas Refiners and Producers includes Scope 3)	g CO ₂ /MJ	59.5
Physical Intensity (Iron and Steel includes Scope 1 and 2)	tCO ₂ e/t crude steel	1.45
Physical Intensity (Power Generation – Scope 1 only)	kg CO ₂ /MWh	181.6

Data and information supporting the Scope 3 GHG emissions statement were in some cases estimated rather than historical in nature.

¹ Calendar Year 2024 Exposure Data and Calendar Year 2023 Emissions Data

Period covered by GHG emissions verification:

- January 1, 2024 to December 31, 2024¹

Criteria against which verification was conducted:

- WRI/WBCSD Greenhouse Gas Protocol Corporate Value Chain Accounting and Reporting Standard (Scope 3)
- Partnership for Carbon Accounting Financials (PCAF) Global GHG Accounting and Reporting Standard for the Financial Industry
- Bank of America’s Internal Protocol for calculating Financed Emissions

Reference Standard:

- ISO 14064-3 Second edition 2019-04: Greenhouse gases -- Part 3: Specification with guidance for the verification and validation of greenhouse gas statements

Level of Assurance and Qualifications:

- Limited
- This verification used a materiality threshold of ±5% for aggregate errors in sampled data for each of the above indicators.

GHG Verification Methodology:

Evidence-gathering procedures included but were not limited to:

- Interviews with relevant personnel of Bank of America and their consultant;
- Review of documentary evidence produced by Bank of America;
- Review of Bank of America data and information systems and methodology for collection, aggregation, analysis and review of information used to determine GHG emissions; and
- Audit of a sample of data used by Bank of America to determine GHG emissions.

Verification Opinion:

Based on the process and procedures conducted, there is no evidence that the Scope 3 GHG emissions statement shown above:

- is not a fair representation of the GHG emissions data and information; and
- has not been prepared in accordance with the WRI/WBCSD Greenhouse Gas Protocol Corporate Value Chain Accounting and Reporting Standard (Scope 3).

It is our opinion that Bank of America has established appropriate systems for the collection, aggregation and analysis of quantitative data for determination of these GHG emissions for the stated period and boundaries.

Statement of independence, impartiality and competence

Apex is an independent professional services company that specializes in Health, Safety, Social and Environmental management services including assurance with over 30 years history in providing these services.

No member of the verification team has a business relationship with Bank of America, its Directors or Managers beyond that required of this assignment. We conducted this verification independently and to our knowledge there has been no conflict of interest.

Apex has implemented a Code of Ethics across the business to maintain high ethical standards among staff in their day-to-day business activities.

The verification team has extensive experience in conducting assurance over environmental, social, ethical and health and safety information, systems and processes, has over 20 years combined experience in this field and an excellent understanding of Apex’s standard methodology for the verification of greenhouse gas emissions data.

Attestation:



John A. Rohde, Lead Verifier
Principal Consultant
Apex Companies, LLC



Trevor Donaghu, Technical Reviewer
ESG Director
Apex Companies, LLC

October 7, 2025
This verification opinion declaration, including the opinion expressed herein, is provided to Bank of America and is solely for the benefit of Bank of America in accordance with the terms of our agreement. We consent to the release of this declaration to the public or other organizations for reporting and/or disclosure purposes, without accepting or assuming any responsibility or liability on our part to any other party who may have access to this declaration.



Verification Opinion Declaration Greenhouse Gas Emissions

To: The Stakeholders of Bank of America,

Apex Companies, LLC (Apex) was engaged to conduct an independent verification of the greenhouse gas (GHG) emissions reported by Bank of America for the period stated below. This verification opinion declaration applies to the related information included within the scope of work described below.

The determination of the GHG emissions is the sole responsibility of Bank of America. Bank of America is responsible for the preparation and fair presentation of the GHG emissions statement in accordance with the criteria. Apex’s sole responsibility was to provide independent verification on the accuracy of the GHG emissions reported and on the underlying systems and processes used to collect, analyze and review the information. Apex is responsible for expressing an opinion on the GHG emissions statement based on the verification.

Boundaries of the reporting company GHG emissions covered by the verification:

- Operational Control
- Financed Emissions (auto manufacturing, aviation, cement, energy, iron and steel, maritime [asset specific] and power sectors utilized amounts only)
- Physical Intensities (auto manufacturing, aviation, cement, energy, iron and steel and power sectors committed amounts)

Type of GHGs: CO₂, N₂O, CH₄, Refrigerants

GHG Emissions Statement:

- Scope 3 – Investments:

Category	Units	Utilized
Absolute Total Financed Emissions (Auto Manufacturing)	Thousand Metric tons CO ₂ e	414
Absolute Total Financed Emissions (Aviation includes Scope 1)	Thousand Metric tons CO ₂ e	4,192
Absolute Total Financed Emissions (Cement includes Scope 1 and 2)	Thousand Metric tons CO ₂ e	1,927
Absolute Total Financed Emissions (Energy - Oil and Gas Refiners and Producers includes Scope 1 and 2)	Thousand Metric tons CO ₂ e	1,488
Absolute Total Financed Emissions (Energy - Oil and Gas Refiners and Producers includes Scope 3.11)	Thousand Metric tons CO ₂ e	14,783

Absolute Total Financed Emissions (Energy - Other includes Scope 1 and 2)	Thousand Metric tons CO ₂ e	2,282
Absolute Total Financed Emissions (Iron and Steel includes Scope 1 and 2)	Thousand Metric tons CO ₂ e	1,302
Absolute Total Financed Emissions (Power Generation - Scope 1 only)	Thousand Metric tons CO ₂ e	4,002

Category	Units	Portfolio Alignment Score
Vessel – Level Commercial Shipping (Scope 1 CO ₂)*	Well-Wake, Minimum / Well-Wake, Striving	19%/24%

*Poseidon Principles via 2023 Initial IMO GHG Strategy

Category	Units	Intensity
Physical Intensity (Auto Manufacturing)	g CO ₂ e/km	186.2
Physical Intensity (Aviation includes Scope 1)	gCO ₂ e/RTK	864.5
Physical Intensity (Cement includes Scope 1 and 2)	tCO ₂ e/tCP	0.648
Physical Intensity (Energy – Oil and Gas Refiners and Producers includes Scope 1, 2)	g CO ₂ e/MJ	6.4
Physical Intensity (Energy – Oil and Gas Refiners and Producers includes Scope 3)	g CO ₂ /MJ	59.7
Physical Intensity (Iron and Steel includes Scope 1 and 2)	tCO ₂ e/t crude steel	1.39
Physical Intensity (Power Generation – Scope 1 only)	kg CO ₂ /MWh	160.4

Data and information supporting the Scope 3 GHG emissions statement were in some cases estimated rather than historical in nature.

Period covered by GHG emissions verification:

- January 1, 2023 to December 31, 2023²

Criteria against which verification was conducted:

- WRI/WBCSD Greenhouse Gas Protocol Corporate Value Chain Accounting and Reporting Standard (Scope 3)
- Partnership for Carbon Accounting Financials (PCAF) Global GHG Accounting & Reporting Standard for the Financial Industry
- Bank of America’s Internal Protocol for calculating Financed Emissions

Reference Standard:

- ISO 14064-3 Second edition 2019-04: Greenhouse gases -- Part 3: Specification with guidance for the verification and validation of greenhouse gas statements

Level of Assurance and Qualifications:

- Limited
- This verification used a materiality threshold of ±5% for aggregate errors in sampled data for each of the above indicators.

GHG Verification Methodology:

Evidence-gathering procedures included but were not limited to:

- Interviews with relevant personnel of Bank of America and their consultant;
- Review of documentary evidence produced by Bank of America;
- Review of Bank of America data and information systems and methodology for collection, aggregation, analysis and review of information used to determine GHG emissions; and
- Audit of a sample of data used by Bank of America to determine GHG emissions.

Verification Opinion:

Based on the process and procedures conducted, there is no evidence that the Scope 3 GHG emissions statement shown above:

- Is not a fair representation of the GHG emissions data and information; and
- Has not been prepared in accordance with the WRI/WBCSD Greenhouse Gas Protocol Corporate Value Chain Accounting and Reporting Standard (Scope 3).

It is our opinion that Bank of America has established appropriate systems for the collection, aggregation and analysis of quantitative data for determination of these GHG emissions for the stated period and boundaries.

Statement of independence, impartiality and competence

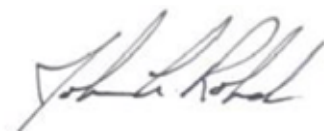
Apex is an independent professional services company that specializes in Health, Safety, Social and Environmental management services including assurance with over 30 years history in providing these services.

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Attestation:



John A. Rohde, Lead Verifier
Principal Consultant
Apex Companies, LLC



Trevor Donaghu, Technical Reviewer
ESG Director
Apex Companies, LLC

October 7, 2025

This verification opinion declaration, including the opinion expressed herein, is provided to Bank of America and is solely for the benefit of Bank of America in accordance with the terms of our agreement. We consent to the release of this declaration to the public or other organizations for reporting and/or disclosure purposes, without accepting or assuming any responsibility or liability on our part to any other party who may have access to this declaration.

² Calendar Year 2023 Exposure Data and Calendar Year 2023 Emissions Data