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 2026 Sustainability at Bank of America 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 2026 Sustainability at Bank of America report 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.

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, 2025 through December 31, 2025 (the 'Subject Matter'):

- Reasonable Assurance of the environmental data and information included in the Report for the calendar year 2025 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; Nitrogen Oxides (NOx) emitted; Sulfur Oxides (SOx) emitted; and other significant air emissions)
  - Waste quantities and disposition
  - Total number and volume of significant releases
  - Compliance (Monetary value of significant fines for non-compliance with environmental laws & regulations)
  - 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 2025 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, 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.

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 December 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 emissions, 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.

Sophie Friets

David Reilly

Sophie Friets, Lead Verifier
Apex Companies, LLC
Rockville, Maryland

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

October 15, 2026

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 2025

Energy

Electricity	6,009,083	GJ
Other Indirect (purchased steam and cooling)	142,694	GJ
Natural Gas	600,641	GJ
Other Direct (fuel oil, jet fuel, gasoline,diesel fuel, propane)	344,821	GJ
Energy Saved Due to Conservation (Projected)	73,576	GJ
Emissions Saved Due to Conservation (Projected)	6,042	tCO_2e
Total Energy	7,097,239	GJ

Electricity from Renewable Sources

Total Renewable and Non-Renewable Electricity Consumption	1,669,190	MWh
Total Renewable Electricity Procured	1,818,772	MWh
% of Total Electricity Procured from Renewable Sources	109	%

Water

Total Withdrawal	1.47	Billion US gallons
Total Potable Water Withdrawal	1.46	Billion US Gallons
Total Consumption	0.29	Billion US Gallons
Total Withdrawal in Water-stressed Areas	2,340	Megaliters
Total Consumption in Water-stressed Areas	636	Megaliters
Water Saved Due to Conservation (Projected)	6,902	Thousand US gallons

Waste Quantities and Disposition

e-Waste Disposed through Certified Suppliers	100	%
Non-Hazardous Waste (Landfill & Incineration)	30,207	Metric tons
Non-Hazardous Waste (Recycling & Compost)	51,272	Metric tons
Construction & Demolition Waste (Landfill & Incineration)	4,847	Metric tons
Construction & Demolition Waste (Recycling, reuse & salvage)	14,571	Metric tons
Construction & Demolition Waste - Landfill Diversion Rate	75	%
Hazardous, Universal, Used Oil, and Asbestos Waste (Landfill & Incineration)	0.027	Metric tons
Hazardous, Universal, Used Oil, and Asbestos Waste (Recycling, Reuse & Salvage)	520	Metric tons
Total Waste	81,999	Metric tons

Materials

Paper		
Total Paper	25,644	Metric tons
Recycled Input Materials by weight	15	%
Certified Materials by weight	97.2	%

Transportation

Support Production and Use of SAF (Cumulative since 2022)	9.95	million gallons
Percent of jet fuel usage utilizing SAF for annual corporate and commercial jet fuel usage	32	%
Mobilize sustainable finance investment for the production of SAF and other low-carbon aviation solutions (Cumulative since 2022)	$0.35	Billion USD

Supplier Engagement

Response rate to climate disclosure requests	91	%
Suppliers asked to disclose climate data	377	
% of spend with suppliers who report GHG or renewable energy targets	77	%
% of spend with suppliers assessed for ESG risks as outlined by our Supplier Code of Conduct	91	%

Compliance

Monetary value of significant fines for non-compliance with environmental laws & regulations	$21,273	USD
Non-Monetary Violations	2	

Total Number and Volume of Significant Releases

Number of Releases	2	qty
Volume of Reportable Releases (Petroleum & Chemical Products)	240	gallons
Amount of Reportable Releases (Refrigerant)	-	lbs

Emissions

Scope 1 GHG Emissions	61,365	tCO_2e
Scope 2 GHG Location-Based Emissions	532,195	tCO_2e
Scope 2 GHG Market-Based Emissions	12,617	tCO_2e
Scope 1 and Scope 2 Carbon Credits Retired	73,982	tCO_2e
Total Net Scope 1 and Market-Based Scope 2 Emissions	-	tCO_2e

Scope 3 GHG Emissions

Purchased Goods and Services	1,957,718	tCO_2e
Capital Goods	35,530	tCO_2e
Fuel- and Energy-Related Activities	129,177	tCO_2e
Upstream Transportation and Distribution	151,426	tCO_2e
Waste (Traditional Disposal)	18,254	tCO_2e
Gross Business Travel	100,584	tCO_2e
Business Travel Carbon Credits Retired	100,584	tCO_2e
Net Business Travel	-	tCO_2e
Employee Commuting	320,834	tCO_2e
Downstream Transportation and Distribution	900,000	tCO_2e
Use of Sold Products	2,000	tCO_2e
End of Life Treatment of Sold Products	10,000	tCO_2e

Greenhouse Gas Emissions by Region

Region	Scope 1 direct emissions (tCO_2e)	Scope 2 indirect emissions - location-based (tCO_2e)	Scope 2 indirect emissions market-based (tCO_2e)	Total Scope 1 and Scope 2 emissions - location-based (tCO_2e)	Total Scope 1 and Scope 2 emissions - market-based (tCO_2e)
U.S. & Canada	58,933	449,720	2,797	508,653	61,730
Asia Pacific	618	63,517	9,570	64,135	10,188
EMEA	1,790	17,821	247	19,611	2,037
Latin America	24	1,138	3	1,162	28
Country					
United States	58,854	449,533	2,797	508,388	61,651
India	254	34,753	2,352	35,007	2,606
United Kingdom	1,093	15,256	-	16,349	1,093
China	69	8,675	259	8,744	328
Singapore	38	7,160	3,428	7,198	3,466
Japan	62	5,945	1	6,008	63
Taiwan	14	2,162	2,162	2,176	2,176
Australia	7	1,870	-	1,877	7
South Korea	97	1,347	1,347	1,445	1,445
Ireland	366	563	-	930	366

Carbon Credits

Avoidance Carbon Credits Retired	107,935	tCO_2e
Removal Carbon Credits Retired	66,631	tCO_2e
Total Carbon Credits Retired	174,566	tCO_2e

NOx, SOx, and Other Significant Air Emissions from Direct Combustion

Emissions of Ozone-Depleting Substances	0.04	Metric tons CFC-11e
Nitrogen Oxides (NO_x)	16	Metric tons
Sulfur Oxides (SO_x)	1	Metric tons
Volatile Organic Compounds (VOCs)	1	Metric tons
Particulate Matter (PM)	2	Metric tons
Carbon Monoxide (CO)	22	Metric tons
Valued Societal Impact of Air Pollution	$114,000	USD

Facilities

LEED (or comparable) certifications	21,938,065	Net square feet
LEED (or comparable) certifications percent of total square footage	35	%
Sites in areas protected for biodiversity	7	Sites
Area of buildings in areas protected for biodiversity	6,753	Square meters