

BANK OF AMERICA CORPORATION

# 2019 GRI Content Index

# GRI Content Index

The 2019 Bank of America Environmental, Social and Governance (ESG) reporting practices align with the GRI Standards framework set forth by the Global Reporting Initiative (GRI). In addition, Bank of America also uses the Financial Sector Supplement to address topics specific to our sector. The chart below outlines which disclosures are included in the report and where they are located. The report follows GRI 101 Foundation (2016). This report has been prepared in accordance with the GRI Standards: Core option. For the Materiality Disclosures Service, GRI Services reviewed that the GRI content index is clearly presented and the references for Disclosures 102-40 to 102-49 align with appropriate sections in the body of the report. For more detailed highlights, read our [2019 Annual Report](#). For the most recent ESG data, read our [2019 ESG Performance Data Summary](#).

GRI Standard	GRI Disclosure	URL(s)
GRI 101 Foundation (2016)		
ORGANIZATIONAL PROFILE		
GRI 102: General Disclosures 2016		
102-1	Name of the organization	Direct Response: Bank of America Corporation
102-2	Activities, brands, products, and services	<a href="#">2019 Annual Report</a> , Business overview, pages 43-44
102-3	Location of headquarters	<a href="#">2019 Annual Report</a> , Financial highlights, page 40
102-4	Location of operations	<a href="#">Who we are, Where we are</a>
102-5	Ownership and legal form	Direct Response: Certificate of Incorporation available at <a href="#">bankofamerica.com/investor</a>
102-6	Markets served	<a href="#">2019 Annual Report</a> , Financial highlights, page 40 <a href="#">2019 Annual Report</a> , Business segment operations, page 53
102-7	Scale of the organization	<a href="#">2019 Annual Report</a> , Business overview, pages 43-44 <a href="#">2019 Annual Report</a> , Financial highlights, page 40
102-8	Number of employees	<a href="#">2019 ESG Performance Data Summary</a> , ESG performance data, Our people, page 4
102-9	Supply chain	<a href="#">What guides us, Our business practices, Vendor management</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG performance data, Our business practices and vendor engagement, pages 3, 7 and 18
102-10	Significant changes to the organization and its supply chain	<a href="#">2019 Annual Report</a> , A letter from Chairman and CEO Brian Moynihan, pages 1-6
102-11	Precautionary principle or approach	Direct Response: We apply the precautionary approach to identifying and addressing longer-term environmental issues that may impact our business, clients and communities, including global climate change. Our commitment to specific policies, industry best practices and collaboration with external experts helps to inform our risk assessments in this area.
102-12	External initiatives	<a href="#">What guides us, Our business practices, Governance</a> <a href="#">Vendor Code of Conduct</a> <a href="#">Human Rights Statement</a> <a href="#">Coal Policy</a>
102-13	Membership of associations	<a href="#">Bank of America investor relations, Corporate governance, Trade association memberships</a>

GRI Standard	GRI Disclosure	URL(s)
<b>STRATEGY</b>		
102-14	Statement from senior decision-maker	<a href="#">2019 Annual Report</a> , Q&A with Anne Finucane, Addressing society's biggest challenges, pages 24-26 <a href="#">2019 Annual Report</a> , A letter from Chairman and CEO Brian Moynihan, pages 1-6
102-15	Key impacts, risks, and opportunities	<a href="#">What guides us, Reporting, Materiality</a>
<b>ETHICS AND INTEGRITY</b>		
102-16	Values, principle, standards and norms of behavior	<a href="#">Who we are, Our company, Our values</a> <a href="#">Who we are, Our company, Our strategy</a> <a href="#">What guides us, Responsible growth</a> <a href="#">Vendor Code of Conduct</a> <a href="#">Bank of America investor relations, Code of Conduct</a>
102-17	Mechanisms for advice and concerns about ethics	<a href="#">What guides us, Our business practices, Risk management</a> <a href="#">What guides us, Our business practices, Governance</a> <a href="#">Bank of America investor relations, Code of Conduct</a>
<b>GOVERNANCE</b>		
102-18	Governance structure	<a href="#">Bank of America investor relations, Corporate governance</a> <a href="#">Bank of America investor relations, Corporate governance, Board of Directors</a>
102-19	Delegating authority	<a href="#">What guides us, Our business practices, Governance</a> <a href="#">What guides us, Our business practices, Risk management</a>
102-20	Executive-level responsibility for economic, environmental, and social topics	<a href="#">What guides us, Our business practices, Governance</a> <a href="#">What guides us, Our business practices, Risk management</a>
102-21	Consulting stakeholders on economic, environmental, and social topics	<a href="#">What guides us, Our business practices, Governance</a> <a href="#">What guides us, Our business practices, Risk management</a>
102-22	Composition of the highest governance body and its committees	<a href="#">What guides us, Our business practices, Governance</a> <a href="#">Bank of America investor relations, Corporate governance</a> <a href="#">Bank of America investor relations, Board of Directors</a> <a href="#">2020 Proxy Statement</a> , Director independence, page 17
102-23	Chair of the highest governance body	<a href="#">What guides us, Our business practices, Governance</a> <a href="#">Bank of America investor relations, Corporate governance, Board of Directors</a>
102-24	Nominating and selecting the highest governance body	Direct Response: Our Board seeks directors whose complementary knowledge, experience, and skills provide a broad range of perspectives and leadership expertise in financial services and other global, highly complex and regulated industries, strategic planning and business development, business operations, marketing and distribution, technology/ cybersecurity, risk management and financial controls, human capital management, corporate governance, public policy, and other areas important to our company's strategy and oversight. Additional information is available in our <a href="#">2020 Proxy Statement</a> in the Corporate Governance Section.
102-25	Conflicts of interest	Direct Response: Bank of America's Code of Conduct guides all staff and management on conflicts of interest.
102-26	Role of highest governance body in setting purpose, values and strategy	<a href="#">What guides us, Our business practices, Governance</a> <a href="#">What guides us, Our business practices, Risk management</a>

GRI Standard	GRI Disclosure	URL(s)
102-27	Collective knowledge of highest governance body	<a href="#">What guides us, Our business practices, Governance</a> <a href="#">What guides us, Our business practices, Risk management</a>
102-28	Evaluating the highest governance body's performance	<a href="#">What guides us, Our business practices, Governance</a> <a href="#">What guides us, Our business practices, Risk management</a>
102-29	Identifying and managing economic, environmental, and social impacts	<a href="#">What guides us, Our business practices, Governance</a> <a href="#">What guides us, Our business practices, Risk management</a> <a href="#">2019 ESG Performance Data Summary</a> , Environmental and social risk, pages 9-10
102-30	Effectiveness of risk management processes	<a href="#">What guides us, Our business practices, Governance</a> <a href="#">What guides us, Our business practices, Risk management</a>
102-31	Review of economic, environmental, and social topics	<a href="#">What guides us, Our business practices, Governance</a> <a href="#">What guides us, Our business practices, Risk management</a> <a href="#">2019 ESG Performance Data Summary</a> , Environmental and social risk, pages 9-10
102-32	Highest governance body's role in sustainability reporting	<a href="#">What guides us, Our business practices, Governance</a> <a href="#">What guides us, Reporting, ESG Reporting Frameworks</a>
102-33	Communicating critical concerns	<a href="#">Bank of America investor relations, Code of Conduct</a> <a href="#">What guides us, Our business practices, Governance</a> <a href="#">What guides us, Our business practices, Risk management</a>
102-35	Remuneration policies	<a href="#">2020 Proxy Statement</a> , Compensation governance and risk management, pages 26-28 <a href="#">What guides us, Our people, Recognizing &amp; rewarding performance</a>
102-36	Process for determining remuneration	<a href="#">2020 Proxy Statement</a> , Compensation governance and risk management, pages 26-28 <a href="#">What guides us, Our people, Recognizing &amp; rewarding performance</a>
102-37	Stakeholders' involvement in remuneration	<a href="#">2020 Proxy Statement</a> , Shareholder engagement, pages 29-31 <a href="#">What guides us, Our people, Recognizing &amp; rewarding performance</a>

## STAKEHOLDER ENGAGEMENT

102-40	List of stakeholder groups	<a href="#">What guides us, Our business practices, Governance, Stakeholder engagement</a>
102-41	Collective bargaining agreements	Direct Response: No U.S.-based employees are subject to collective bargaining agreements.
102-42	Identifying and selecting stakeholders	<a href="#">What guides us, Our business practices, Governance, Stakeholder engagement</a>
102-43	Approach to stakeholder engagement	<a href="#">What guides us, Our business practices, Governance, Stakeholder engagement</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG performance data, Employee engagement, page 4
102-44	Key topics and concerns raised	<a href="#">What guides us, Our business practices, Governance, Stakeholder engagement, National Community Advisory Council</a> <a href="#">What guides us, Our business practices, Risk management</a>

GRI Standard	GRI Disclosure	URL(s)
<b>REPORTING PRACTICE</b>		
102-45	Entities included in the consolidated financial statements	<a href="#">2019 Annual Report</a> , Business segment operations, page 53
102-46	Defining report content and topic boundaries	<a href="#">What guides us, Reporting, Introductory paragraph</a> <a href="#">What guides us, Reporting, Materiality, Definitions of issues</a>
102-47	List of material topics	<a href="#">What guides us, Reporting, Materiality</a>
102-48	Restatements of information	Direct Response: Re-statements are clearly marked throughout our reporting content.
102-49	Changes in reporting	Direct Response: Any significant changes are noted alongside data within our reporting content.
102-50	Reporting period	<a href="#">What guides us, Reporting</a>
102-51	Date of most recent report	<a href="#">What guides us, Reporting, Report Center</a>
102-52	Reporting cycle	<a href="#">What guides us, Reporting</a>
102-53	Contact point for questions regarding the report	Direct Response: Questions regarding the ESG content in the <a href="#">2019 Annual Report</a> should be directed to ESG_Information@bofa.com. All other questions should be directed to Investor Relations.
102-54	Claims of reporting accordance with the GRI Standards	<a href="#">What guides us, Reporting, ESG Reporting Frameworks</a>
102-55	GRI content index	<a href="#">What guides us, Reporting, ESG Reporting Frameworks</a>
102-56	External Assurance	<a href="#">What guides us, Reporting, ESG Reporting Frameworks</a>

GRI Standard	GRI Disclosure	URL(s)
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## MATERIAL TOPICS

### Environment

#### Financing Transition to Low-Carbon Economy

#### GRI 103: Management Approach Disclosures 2016

103-1	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Environmental sustainability</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Environmental sustainability</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

#### Financial Services Sector Specific Aspect: Product Portfolio

FS6	Percentage of the portfolio for business lines by specific region, size (e.g. micro/ sme/large) and by sector	<a href="#">2019 Annual Report</a> , pages 3-6, 40, and 53
FS7	Monetary value of products and services designed to deliver a specific social benefit for each business line broken down by purpose	<a href="#">What guides us, Making an impact, Enabling financial health, Impact investing</a> <a href="#">What guides us, Making an impact, Enabling financial health, Homeownership</a>
FS8	Monetary value of products and services designed to deliver a specific environmental benefit for each business line broken down by purpose	<a href="#">What guides us, Making an impact, Environmental sustainability, Business and partners</a> <a href="#">What guides us, Making an impact, Enabling financial health, Impact investing</a>

### Natural Resource Management in Operations and Supply Chain

#### GRI 103: Management Approach Disclosures 2016

103-1:	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2:	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Environmental sustainability</a> <a href="#">2018 CDP Climate Change</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3:	Evaluation of the management approach	<a href="#">What guides us Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Environmental sustainability</a> <a href="#">2018 CDP Climate Change</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

GRI Standard	GRI Disclosure	URL(s)
<b>GRI 301: Materials 2016</b>		
301-1:	Materials used by weight or volume	<a href="#">What guides us, Making an impact, Environmental sustainability, Operations and employees</a> <a href="#">2019 ESG Performance Data Summary</a> , About our 2019 environmental operations data, Renewable material usage – paper, page 16
301-2:	Recycled input materials used	<a href="#">What guides us, Making an impact, Environmental sustainability, Operations and employees</a> <a href="#">2019 ESG Performance Data Summary</a> , About our 2019 environmental operations data, Renewable material usage – paper, page 16
<b>GRI 302: Energy 2016</b>		
302-1:	Energy consumption within the organization	<a href="#">What guides us, Making an impact, Environmental sustainability, Operations and employees</a> <a href="#">2019 ESG Performance Data Summary</a> , About our 2019 environmental operations data, Direct and indirect energy consumption data tables, page 14 <a href="#">2018 CDP Climate Change</a>
302-4:	Reduction of energy consumption	<a href="#">What guides us, Making an impact, Environmental sustainability, Operations and employees</a> <a href="#">2019 ESG Performance Data Summary</a> , About our 2019 environmental operations data, Direct and indirect energy consumption data tables, page 14
302-5:	Reductions in energy requirements of products and services	<a href="#">What guides us, Making an impact, Environmental sustainability, Business and partners</a>
<b>GRI 303: Water 2016</b>		
303-1:	Water withdrawal by source	<a href="#">What guides us, Making an impact, Environmental sustainability, Operations and employees</a> <a href="#">2019 ESG Performance Data Summary</a> , About our 2019 environmental operations data, Water, page 16 <a href="#">2018 CDP Climate Change</a>
303-3:	Water recycled and reused	<a href="#">What guides us, Making an impact, Environmental sustainability, Operations and employees</a> <a href="#">2019 ESG Performance Data Summary</a> , About our 2019 environmental operations data, Water, page 16 <a href="#">2018 CDP Climate Change</a>
<b>GRI 305: Emissions 2016</b>		
305-1:	Direct (Scope 1) GHG emissions	<a href="#">What guides us, Making an impact, Environmental sustainability, Operations and employees</a> <a href="#">2019 ESG Performance Data Summary</a> , About our 2019 environmental operations data, Greenhouse Gas emissions, Scope 1 and 2 emissions, page 11 <a href="#">2018 CDP Climate Change</a>
305-2:	Energy indirect (Scope 2) GHG emissions	<a href="#">What guides us, Making an impact, Environmental sustainability, Operations and employees</a> <a href="#">2019 ESG Performance Data Summary</a> , About our 2019 environmental operations data, Greenhouse Gas emissions, Scope 1 and 2 emissions, page 11 <a href="#">2018 CDP Climate Change</a>

GRI Standard	GRI Disclosure	URL(s)
305-3:	Other indirect (Scope 3) GHG emissions	<a href="#">What guides us, Making an impact, Environmental sustainability, Operations and employees</a> <a href="#">2019 ESG Performance Data Summary</a> , About our 2019 environmental operations data, Scope 3 emissions, page 12 <a href="#">2018 CDP Climate Change</a>
305-5:	Reduction of GHG emissions	<a href="#">What guides us, Making an impact, Environmental sustainability, Operations and employees</a> <a href="#">2019 ESG Performance Data Summary</a> , About our 2019 environmental operations data, Greenhouse Gas emissions, page 12 <a href="#">2018 CDP Climate Change</a>
305-6:	Emissions of ozone-depleting substances (ODS)	<a href="#">What guides us, Making an impact, Environmental sustainability, Operations and employees</a> <a href="#">2019 ESG Performance Data Summary</a> , About our 2019 environmental operations data, NO <sub>x</sub> , SO <sub>x</sub> and other significant air emissions from direct combustion, page 14 <a href="#">2018 CDP Climate Change</a>
305-7:	Nitrogen oxides (NO <sub>x</sub> ), sulfur oxides (SO <sub>x</sub> ), and other significant air emissions	<a href="#">What guides us, Making an impact, Environmental sustainability, Operations and employees</a> <a href="#">2019 ESG Performance Data Summary</a> , About our 2019 environmental operations data, NO <sub>x</sub> , SO <sub>x</sub> and other significant air emissions from direct combustion, page 14 <a href="#">2018 CDP Climate Change</a>

### GRI 306: Effluents and Waste 2016

306-1:	Water discharge by quality and destination	Direct response: Water is withdrawn from municipal sources (except for a small amount of rainwater) and discharged to municipal sewer systems and their associated treatment facilities.
306-2:	Waste by type and disposal method	<a href="#">What guides us, Making an impact, Environmental sustainability, Operations and employees</a> <a href="#">2019 ESG Performance Data Summary</a> , About our 2019 environmental operations data, Waste, page 17
306-3:	Significant spills	<a href="#">2019 ESG Performance Data Summary</a> , About our 2019 environmental operations data, Compliance, page 18

### GRI 307: Environmental Compliance 2016

307-1:	Non-compliance with environmental laws and regulations	<a href="#">2019 ESG Performance Data Summary</a> , About our 2019 environmental operations data, Environmental spend, page 18
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### GRI 308: Supplier Environmental Assessment 2016

308-2:	Negative environmental impacts in the supply chain and actions taken	Direct Response: We sent the CDP (formerly Carbon Disclosure Project) Supply Chain Climate Questionnaire to 191 third parties, which collectively represented 71% of our supply chain spend in 2019. 92% of these third parties responded to the questionnaire. Additionally, as part of our supply chain monitoring process, all third parties receive our Vendor Code of Conduct, which sets forth our expectations for human rights, labor and environmental standards throughout our global supply chain. Our contract templates include terms to ensure that our third parties use socially and environmentally beneficial practices relevant to and in line with best practices in their particular industry.
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GRI Standard	GRI Disclosure	URL(s)
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## GHG/Non GHG Emissions in Internal Operations and Supply Chain

### GRI 103: Management Approach 2016

103-1:	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2:	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Environmental sustainability</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3:	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Environmental sustainability</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

## Social

### Consumer Financial Health

#### GRI 103: Management Approach 2016

103-1	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Enabling financial health</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Enabling financial health</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

#### GRI 417: Marketing and Labeling 2016

417-1	Requirements for product and service information and labeling	<a href="#">What guides us, Making an impact, Enabling financial health, Responsible products &amp; services</a>
417-2	Incidents of non-compliance concerning product and service information and labeling	Direct Response: We report material non-compliance incidents according to SEC standards.
417-3	Incidents of non-compliance concerning marketing communications	Direct Response: We report material non-compliance incidents according to SEC standards.

GRI Standard	GRI Disclosure	URL(s)
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## Community Investment

### GRI 103: Management Approach 2016

103-1	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Driving economic &amp; social progress</a> <a href="#">What guides us, Making an impact, Enabling financial health</a> <a href="#">2019 ESG Performance Data Summary, ESG goals &amp; progress, pages 2-3</a>
103-3	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Driving economic &amp; social progress</a> <a href="#">What guides us, Making an impact, Enabling financial health</a> <a href="#">2019 ESG Performance Data Summary, ESG goals &amp; progress, pages 2-3</a>

### GRI 413: Local Communities 2016

413-1	Operations with local community engagement, impact assessments, and development programs	<a href="#">What guides us, Making an impact, Enabling financial health, Small businesses</a> <a href="#">What guides us, Making an impact, Enabling financial health, Homeownership</a> <a href="#">What guides us, Making an impact, Enabling financial health, Responsible products &amp; services</a> <a href="#">What guides us, Making an impact, Enabling financial health, Impact investing</a>
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### GRI 203: Indirect Economic Impacts 2016

203-1	Infrastructure investments and services supported	<a href="#">What guides us, Making an impact, Enabling financial health, Small businesses</a> <a href="#">What guides us, Making an impact, Enabling financial health, Homeownership</a> <a href="#">What guides us, Making an impact, Enabling financial health, Impact investing</a>
203-2	Significant indirect economic impacts	<a href="#">What guides us, Making an impact, Enabling financial health, Responsible products &amp; services</a> <a href="#">What guides us, Making an impact, Enabling financial health, Homeownership</a> <a href="#">What guides us, Making an impact, Enabling financial health, Impact investing</a> <a href="#">2019 ESG Performance Data Summary, ESG goals &amp; progress, Driving economic and social progress, Enabling financial health, pages 2-3, 5 and 7</a>

### Financial Services Sector Specific Aspect: Local Communities

FS13	Access points in low-populated or economically disadvantaged areas by type	<a href="#">What guides us, Making an impact, Enabling financial health, Responsible products &amp; services</a> <a href="#">What guides us, Making an impact, Enabling financial health, Homeownership</a> <a href="#">What guides us, Making an impact, Enabling financial health, Small businesses</a>
FS14	Initiatives to improve access to financial services for disadvantaged people	<a href="#">What guides us, Making an impact, Enabling financial health, Responsible products &amp; services</a> <a href="#">What guides us, Making an impact, Enabling financial health, Homeownership</a> <a href="#">What guides us, Making an impact, Enabling financial health, Small businesses</a> <a href="#">What guides us, Making an impact, Enabling financial health, Impact investing</a>

GRI Standard	GRI Disclosure	URL(s)
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## Wealth Inequality

### GRI 103: Management Approach 2016

103-1	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Driving economic &amp; social progress 2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Driving economic &amp; social progress 2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

### GRI 201: Economic Performance 2016

201-1	Direct economic value generated and distributed	<a href="#">What guides us, Making an impact, Enabling financial health, Small businesses</a> <a href="#">What guides us, Making an impact, Enabling financial health, Homeownership 2019 ESG Performance Data Summary</a> , ESG goals & progress, Driving economic and social progress, Enabling financial health, pages 2-3, 5 and 7 <a href="#">2019 Annual Report</a> , Financial Highlights, page 40
201-2	Financial implications and other risks and opportunities due to climate change	<a href="#">2018 CDP Climate Change</a>
201-3	Defined benefit plan obligations and other retirement plans	<a href="#">What guides us, Making an impact, Our people, Wellness 2019 Annual Report</a> , Note 18, Pension and Postretirement Plans, pages 160-164
201-4	Financial assistance received from government	Direct Response: Bank of America did not benefit from any direct capital or liquidity assistance from the U.S. government in 2019.

## Consumer Financial Protection

### GRI 103: Management Approach 2016

103-1	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Enabling financial health 2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Enabling financial health 2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

### GRI 418: Customer Privacy 2016

418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	<a href="#">What guides us, Our business practices, Governance</a> <a href="#">What guides us, Our business practices, Risk management</a>
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GRI Standard	GRI Disclosure	URL(s)
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## Retail Branch Strategy/Presence

### GRI 103: Management Approach 2016

103-1	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">Who we are, Our company, Our businesses</a> <a href="#">What guides us, Making an impact, Enabling financial health</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">Who we are, Our company, Our businesses</a> <a href="#">What guides us, Making an impact, Enabling financial health</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

## Access to Finance

### GRI 103: Management Approach 2016

103-1	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Driving economic &amp; social progress</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Driving economic &amp; social progress</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

## Responsible Sourcing

### GRI 103: Management Approach 2016

103-1	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Enabling financial health</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Enabling financial health</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

GRI Standard	GRI Disclosure	URL(s)
<b>Human Rights Practices</b>		
<b>GRI 103: Management Approach 2016</b>		
103-1	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Our business practices</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Our business practices</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
<b>GRI 407: Freedom of Association and Collective Bargaining 2016</b>		
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Direct Response: With respect to our operations, no U.S.-based employees are subject to collective bargaining agreements. For our supply chain, we do not collect this data.
<b>GRI 408: Child Labor 2016</b>		
408-1	Operations and suppliers at significant risk for incidents of child labor	<a href="#">Human Rights Statement</a>
<b>GRI 409: Forced or Compulsory Labor 2016</b>		
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	<a href="#">Human Rights Statement</a>
<b>GRI 410: Security Practices 2016</b>		
410-1	Security personal trained in human rights policies or procedures	<a href="#">Human Rights Statement</a>
<b>GRI 412: Human Rights Assessment 2016</b>		
412-1	Employee training on human rights policies or procedures	<a href="#">What guides us, Making an impact, Our people, Attracting &amp; developing talent</a> <a href="#">Human Rights Statement</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG performance data, Training hours, page 4
<b>GRI 414: Supplier Social Assessment 2016</b>		
414-2	Negative social impacts in the supply chain and actions taken	Direct Response: We performed a risk assessment to identify industry sectors at high risk of Modern Slavery. Due diligence is performed on new third parties providing products or services linked to these industry sectors. We also perform daily negative news monitoring to help ensure that issues reported by the media are identified and addressed quickly. Twelve third party issues were identified and investigated in 2019. Additionally, all third parties receive our Vendor Code of Conduct, which sets forth our expectations for human rights, labor and environmental standards throughout our global supply chain. Our contract templates specifically prohibit third parties from engaging in any practice that could reasonably be considered as employing or encouraging child labor, forced labor, slavery or human trafficking.

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## Investor Activism and Proxy Voting

### GRI 103: Management Approach 2016

103-1	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Our business practices</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Our business practices</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

## People

### Employee Diversity

#### GRI 103: Management Approach 2016

103-1	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Our people</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Our people</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

#### GRI 405: Diversity and Equal Opportunity 2016

405-1	Diversity of governance bodies and employees	<a href="#">What guides us, Making an impact, Our people, Diversity &amp; inclusion</a> <a href="#">What guides us, Making an impact, Our people, Our global workforce</a>
405-2	Ratio of basic salary and remuneration of women to men	Omission: Confidentiality Constraints: Data that is intended for limited disclosure on a need-to-know basis and where unauthorized disclosure, loss or corruption of these data elements would cause serious or high-degree of damage, reputational risk or penalties to Bank of America, its customers, partners or employees, etc. Reasons for limiting disclosure include, but are not limited to, government regulations, legal or contractual agreements and competitive advantage for the company.

### Talent Attraction and Retention

#### GRI 103: Management Approach 2016

103-1	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Our people</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Our people</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

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## GRI 401: Employment 2016

401-1	New employee hires and employee turnover	Direct Response: We report new employee hires that are part of our Pathways, Campus and Military hiring programs, and turnover for the whole company. This information can be found in our <a href="#">2019 ESG Performance Data Summary</a> on page 2.
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	<a href="#">What guides us, Making an impact, Our people, Wellness</a> <a href="#">What guides us, Making an impact, Our people, Attracting &amp; developing talent</a> <a href="#">What guides us, Making an impact, Our people, Recognizing &amp; rewarding performance</a>
401-3	Parental leave	<a href="#">What guides us, Making an impact, Our people, Wellness</a>

## GRI 404: Training and Education 2016

404-1	Average hours of training per year per employee	<a href="#">What guides us, Our business practices, Risk management</a> <a href="#">What guides us, Making an impact, Our people, Attracting &amp; developing talent</a>
404-2	Programs for upgrading employee skills and transition assistance programs	<a href="#">What guides us, Making an impact, Our people, Wellness</a> <a href="#">What guides us, Making an impact, Our people, Attracting &amp; developing talent</a>
404-3	Percentage of employees receiving regular performance and career development reviews	<a href="#">What guides us, Making an impact, Our people, Recognizing &amp; rewarding performance</a> Omission: Not Applicable: The percentage of completed reviews does not necessarily speak to our overall pay-for-performance methodology, and this detail has not been included in the past for ESG purposes.

## Employee Knowledge of ESG Issues

## GRI 103: Management Approach 2016

103-1	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Our company</a> <a href="#">What guides us, Making an impact, Our people</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Our company</a> <a href="#">What guides us, Making an impact, Our people</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

## GRI 205: Anti-corruption 2016

205-1	Operations assessed for risks related to corruption	Direct Response: 100% of business units are analyzed for risks related to corruption.
205-2	Communication and training about anti-corruption policies and procedures	Direct Response: 100% of Bank of America employees are required to take training of the anti-bribery and anti-corruption policies as part of Bank of America's Code of Conduct training.

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## Equal Pay and Wage Gap

### GRI 103: Management Approach 2016

103-1	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Our people</a> <a href="#">What guides us, Our business practices</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Our people</a> <a href="#">What guides us, Our business practices</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

## Employee Practices and Benefits

### GRI 103: Management Approach 2016

103-1	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Our people</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Our people</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

### GRI 403: Occupational Health and Safety 2016

403-1	Workers representation in formal joint management-worker health and safety committees	<a href="#">What guides us, Our business practices, Risk management</a>
403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	Omission: Confidentiality Constraints: Data that is intended for limited disclosure on a need-to-know basis and where unauthorized disclosure, loss or corruption of these data elements would cause serious or high-degree of damage, reputational risk or penalties to Bank of America, its customers, partners or employees, etc. Reasons for limiting disclosure include, but are not limited to, government regulations, legal or contractual agreements and competitive advantage for the company.
403-3	Workers with high incidence of high risk of disease related to their occupation	<a href="#">What guides us, Making an impact, Our people, Wellness</a>



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## Employee Volunteerism

### GRI 103: Management Approach 2016

103-1	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Our people</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Our people</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

## Workforce Reductions

### GRI 103: Management Approach 2016

103-1	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Our people</a> <a href="#">What guides us, Our business practices</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Our people</a> <a href="#">What guides us, Our business practices</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

## Governance

### Employee Incentives and Risk Culture

### GRI 103: Management Approach 2016

103-1	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Our people</a> <a href="#">What guides us, Our business practices</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Making an impact, Our people</a> <a href="#">What guides us, Our business practices</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

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## Ethical Behavior

### GRI 103: Management Approach 2016

103-1	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">Who we are, Our company</a> <a href="#">What guides us, Our business practices</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">Who we are, Our company</a> <a href="#">What guides us, Our business practices</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

## Data Privacy and Security

### GRI 103: Management Approach 2016

103-1	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Our business practices</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Our business practices</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

## Systemic Risk Management

### GRI 103: Management Approach 2016

103-1	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Our business practices</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Our business practices</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

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## Financial Services Sector Specific Aspect: Active Ownership

FS10	Percentage and number of companies held in the institution's portfolio with which the reporting organization has interacted on environmental or social issues	Omission: Information Unavailable: While we engage with companies on environmental and social issues, we do not currently track the percentage and number.
FS11	Percentage of assets subject to positive and negative environmental or social screening	<a href="#">What guides us. Making an impact. Enabling financial health. Impact investing</a>

## ESG Integration in Financial Analysis

### GRI 103: Management Approach 2016

103-1	Explanation of the material topic and its boundary	<a href="#">What guides us. Reporting. Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us. Reporting. Materiality</a> <a href="#">What guides us. Responsible growth</a> <a href="#">2019 Annual Report</a> , Q&A with Anne Finucane, Addressing society's biggest challenges; pages 24-26 <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us. Reporting. Materiality</a> <a href="#">What guides us. Responsible growth</a> <a href="#">2019 Annual Report</a> , Q&A with Anne Finucane, Addressing society's biggest challenges; pages 24-26 <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

## Operating Within the Legal and Regulatory Environment

### GRI 103: Management Approach 2016

103-1	Explanation of the material topic and its boundary	<a href="#">What guides us. Reporting. Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us. Reporting. Materiality</a> <a href="#">Who we are. Our company</a> <a href="#">What guides us. Our business practices</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us. Reporting. Materiality</a> <a href="#">Who we are. Our company</a> <a href="#">What guides us. Our business practices</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

## Financial Services Sector Specific Aspect: Audit

	Coverage and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures	<a href="#">Bank of America Corporation Environmental and Social Risk Policy Framework</a>
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## Transparency, Accountability, and Reporting

### GRI 103: Management Approach 2016

103-1	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">Who we are, Our company</a> <a href="#">What guides us, Our business practices</a> <a href="#">What guides us, Reporting</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">Who we are, Our company</a> <a href="#">What guides us, Our business practices</a> <a href="#">What guides us, Reporting</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

## Zero-Tolerance Conduct/Grievance Mechanisms

### GRI 103: Management Approach 2016

103-1	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">Who we are, Our company</a> <a href="#">What guides us, Our business practices</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">Who we are, Our company</a> <a href="#">What guides us, Our business practices</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

## Lobbying and Public Policy Engagement

### GRI 103: Management Approach 2016

103-1	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Our business practices</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">What guides us, Our business practices</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3

GRI Standard	GRI Disclosure	URL(s)
<b>GRI 415: Public Policy 2016</b>		
415-1	Political contributions	<a href="#">Bank of America investor relations, Political activities</a>
<b>Board Diversity and Independence</b>		
<b>GRI 103: Management Approach 2016</b>		
103-1	Explanation of the material topic and its boundary	<a href="#">What guides us, Reporting, Materiality</a>
103-2	The management approach and its components	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">Who we are, Our leadership</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3
103-3	Evaluation of the management approach	<a href="#">What guides us, Reporting, Materiality</a> <a href="#">Who we are, Our leadership</a> <a href="#">2019 ESG Performance Data Summary</a> , ESG goals & progress, pages 2-3