Code of Conduct: our foundation for success

To my teammates:

Every day, we work hard to drive responsible growth — this means growing and winning in the marketplace, focusing on the client in everything we do, managing risk well and making sure our growth is sustainable.

Our Code of Conduct helps guide us in how we do these things, living our values and delivering on our purpose to make clients, financial lives better, and doing it the right way.

To keep all of this top of mind, we are each required annually to review, acknowledge and understand our Code of Conduct. Thank you for doing so, and for upholding our ethical standards and commitment to our values in all you do every day for our clients, teammates and communities.

Brian Moynihan
Chief Executive Officer Bank of America
At Bank of America, we ask the question “What would you like the power to do?” every day of all those we serve. It is at the core of how we live our values, deliver our purpose and achieve responsible growth.

Our purpose

We are guided by a common purpose to help make financial lives better through the power of every connection.

Driving responsible growth

We deliver on our purpose through a focus on responsible growth. By investing in the success of our employees, helping to create jobs, develop communities, foster economic mobility and address society’s biggest challenges — while managing risk well and providing a return to our clients and our business — we are driving growth and ensuring our long-term success. To drive responsible growth:

- We must grow and win in the market — no excuses
- We must grow with our customer-focused strategy
- We must grow within our risk framework
- We must grow in a sustainable manner
Our values

Our purpose and values form the foundation of our culture—a culture that is rooted in integrity, disciplined risk management and teamwork to better serve our customers and clients, strengthen our communities and deliver value to our shareholders.

Deliver together
We believe in the importance of treating each customer, client and teammate as an individual and treating every moment as one that matters. We strive to go the distance to deliver with discipline and passion. We believe in connecting with people person-to-person with empathy and understanding. We believe everything we do for customers, clients, teammates and the communities we serve is built on a solid business foundation that delivers for shareholders.

Act responsibly
We believe that integrity and the disciplined management of risk form the foundation of our business. We are aware that our decisions and actions affect people’s lives every day. We believe in making decisions that are clear, fair and grounded in the principles of shared success, responsible citizenship and community building.

Realize the power of our people
We strive to help all employees reach their full potential. We believe that diverse backgrounds and experiences make us stronger. We respect every individual and value our differences—in thought, style, culture, ethnicity and experience.

Trust the team
We believe that the best outcomes are achieved when people work together across the entire company. We believe great teams are built on mutual trust, shared ownership and accountability. We act as one company and believe when we work together, we best meet the full needs of our customers and clients.
Our culture

Our culture comes from how we run the company every day, by acting responsibly and managing risk well, which includes our commitments to honest and ethical behavior, acting with integrity, and complying with applicable laws, rules, regulations and policies. We recognize that cultivating a strong culture is an ongoing effort, fostered day after day in both formal and informal ways. Building a unified culture requires thoughtful, purposeful action, and we do this by ensuring all of our employees — from different businesses, companies, and countries — are aligned to our purpose of making financial lives better ...through the power of every connection.
Notice to employees

Nothing in this Code prohibits or limits any employee or his/her counsel from initiating communications directly with, responding to any inquiry from, volunteering information to, or providing testimony before, the Securities and Exchange Commission, the Department of Justice, Financial Industry Regulatory Authority, Inc., any other self-regulatory organization or any other governmental, law enforcement, or regulatory authority, in connection with any reporting of, investigation into, or proceeding regarding suspected violations of law, and no employee is required to advise or seek permission from the company before engaging in any such activity. In connection with any such activity permitted above, employees should identify any information that is confidential and ask the government agency for confidential treatment of such information. Despite the foregoing, employees are not permitted to reveal to any third party, including any governmental, law enforcement or regulatory authority, information employee came to learn during the course of employee’s employment with the company that is protected from disclosure by any applicable privilege, including but not limited to the attorney-client privilege, attorney work product doctrine and/or other applicable legal privileges. The company does not waive any applicable privileges or the right to continue to protect its privileged attorney-client information, attorney work product, and other privileged information. Additionally, employees recognize that employees’ ability to disclose information may be limited or prohibited by applicable law and the company does not consent to disclosures that would violate applicable law. Such applicable laws include, without limitation, laws and regulations restricting disclosure of confidential supervisory information or disclosures subject to the Bank Secrecy Act (31 U.S.C. §§ 5311-5330), including information that would reveal the existence or contemplated filing of a suspicious activity report.

Confidential supervisory information includes any information or materials relating to the examination and supervision of the company by applicable bank regulatory agencies, company materials responding to or referencing nonpublic information relating to examinations or supervision by bank regulatory agencies and correspondence to or from applicable banking regulators.

The terms “Bank of America,” “the Bank,” “the Company,” “corporation” and “company” refer to Bank of America Corporation and each of its direct and indirect subsidiaries. For convenience, we use these terms because various companies within Bank of America use this document. The use of these terms here or in other publications does not mean you are an employee of Bank of America Corporation. The use of these terms or issuance of this document does not change your existing at-will employee status. Employees remain employed at will, and the at-will employment relationship can only be changed by an authorized company representative in writing. Similarly, the use of these terms or the requirement to read and adhere to this Code does not change your employment status of the employees of the company’s third parties or contractors. The term “associate,” “employee,” “teammate” or “you” refers to any Bank of America director, officer or employee. The 2020 Code of Conduct supersedes and replaces any prior communications, policies, rules, practices, standards and/or guidelines that are less restrictive or to the contrary, whether written or oral. To the extent there are any conflicts with the Employee Handbook in the U.S. and in countries with an Employee Handbook, the language of this Code supersedes the Employee Handbook in the U.S. and in countries with an Employee Handbook. If any provision of this Code conflicts with your local law, the provisions of your local law apply.
Our Code of Conduct

Bank of America is committed to the highest standards of ethical and professional conduct. The Code of Conduct (the “Code of Conduct” or the “Code”) provides basic guidelines of business practice, professional and personal conduct that we are expected to adopt and uphold as Bank of America employees. The Code of Conduct contains the following key themes consistent with our values:

We honor our Code
- Making good responsible decisions
- Fair dealing and responsibilities
- Conduct management
- Observing the Code of Conduct and annual training
- Code waivers
- Special obligations of managers
- Reporting conduct complaints and possible violations
- Non-retaliation

We manage risk well

We act ethically
- Conflicts of interest
- Anti-bribery and anti-corruption (ABAC)
- Gifts and entertainment
- U.S. political contributions and activities
- Interactions with government employees
- Personal relationships among employees
- Gifts among employees
- Outside business activities
- Activities outside of work
- Interactions with third parties
- Charitable contributions
- Corporate opportunities

We are fair and honest in our communications
- Responding to media inquiries
- Electronic communications and social media
- Duty to cooperate
- Duty to report arrests

We safeguard information
- Customer information
- Supervisory information received from regulatory authorities
- Bank of America information
- Employee information
- Third-party information
- Intellectual property of others

We will not misuse information
- Restrictions on trading in securities or financial instruments
- What is MNPI or Material, Nonpublic Information

We protect Bank of America assets
- Bank of America intellectual property

We conduct our financial affairs responsibly
- Personal borrowing and lending
- Business expenses
- Personal accounts and fees

We comply with laws and regulations
- Anti-money laundering and economic sanctions
- Facilitation of tax evasion
- Books and records

We value each and every teammate
- Diversity & inclusion
- Discrimination and harassment
- Workplace violence
- Domestic violence
- Workplace safety
- Business continuity

We focus on growing responsibly
- Environmental, Social and Governance
- Human Rights
Our Code of Conduct

Our Code applies to all employees of Bank of America. In addition to employees, this Code defines our expectations of everyone who acts on our behalf, including, but not limited to, consultants, third parties and contractors. All who act on our behalf are expected to embrace the spirit of this document and to behave with the highest level of integrity.

Your manager or Compliance and Operational Risk officer will provide you with access to any manuals, policies, procedures and training related to your specific job. You should refer to the Employee Handbook in the U.S. and in countries with their own Employee Handbook for additional information on employee conduct. The company may publish additional policies as deemed necessary or appropriate. You are expected to follow this Code, other policies referred to in the Code, additional policies that apply to your specific job and the spirit and letter of all applicable laws and regulations. Violation of the Code of Conduct or other policies, procedures, laws and regulations will be dealt with promptly and constitutes grounds for disciplinary action, including termination of employment and possible legal action.
We honor our Code

Making good, responsible decisions

Every decision we make as an institution and as employees has the potential to impact not only the company and our teammates, but our customers, clients, shareholders and communities as well. We all strive to make good, responsible decisions and to do the right thing. However, making decisions is not always easy. Keep the following in mind to help you make informed, thoughtful decisions:

- Make sure you have the relevant facts.
- Take into account relevant laws, rules, regulations and policies.
- Consider competing interests.
- Identify potential options and their consequences.
- Uphold Bank of America values.

Ethical decision-making tree

- Is it legal?
  - YES
  - NOT SURE
    - Contact the Legal department for guidance.
- Is it in accordance with Bank of America’s policies?
  - YES
  - NOT SURE
    - Review the Global Policy Source or contact your Compliance and Operational Risk Officer.
- Does it reflect Bank of America’s core values?
  - YES
  - NOT SURE
    - Review the Bank of America values in the Code of Conduct for guidance.
- Could it adversely impact our customers or stockholders?
  - NOT SURE
    - Seek guidance from your manager or your Compliance and Operational Risk Officer.
  - NO
- Could it be a concern if this decision would appear in the news or social media?
  - NOT SURE
    - Seek guidance from your manager or your Compliance and Operational Risk Officer.
  - NO
- The decision to move forward seems appropriate.
Fair dealing and responsibilities

At Bank of America, we are expected to deal fairly with our employees, customers, suppliers, competitors and other third parties:

- You must not take unfair advantage of any employee, customer, supplier, competitor or other third party through manipulation, concealment, misuse of proprietary and/or confidential information, known misrepresentation of facts or any other unfair business practice.
- You must not give or accept bribes, kickbacks, unauthorized promises or preferential extensions of credit.
- You must approve or award orders, contracts and commitments based on objective business standards to avoid favoritism or perceived favoritism.
- You must not conspire or collude in any way with competitors.
- You must not access a customer’s account except for appropriate business purposes.
Conduct management

Bank of America recognizes the importance of complying with the legal and regulatory requirements in the jurisdictions where it does business and the risks of improper and unethical conduct. The Conduct Risk Management Program document provides a detailed overview of Bank of America’s approach to managing conduct risk.

The Ethics Oversight Committee is responsible for providing oversight and enforcement of the Bank of America Code of Conduct. This includes reviewing and assisting with the resolution of issues, including strategies to prevent violations and certain exceptions, and reviewing information from the Ethics and Compliance Hotline. The committee includes the company’s general auditor, global general counsel, chief risk officer, global compliance & operational risk executive, global human resources executive and deputy general counsel.

Observing the Code of Conduct and annual training

As a Bank of America employee or contractor, you are required to adhere to the Code of Conduct and take Code of Conduct training, which includes an acknowledgment, on an annual basis.

Code waivers

The board of directors must approve any waiver of the Code of Conduct for the chief executive officer, the chief financial officer, the chief accounting officer and any executive officer or director. The company will promptly disclose any such waiver on the Investor Relations portion of its website or through a press release or other public filing as required by applicable law, rule or regulation.
Special obligations of managers

As a manager, you have key obligations to help create a work environment where conduct issues are actively discussed. These obligations include:

• Leading by example: “Set the tone at the top,” actively practice ethical behavior, manage risks in accordance with the company’s Risk Framework and the Conduct Risk Management Program and live the standards of our Code and our values.

• Holding others accountable for acting in accordance with our values, our Code and our Risk Framework and our Conduct Risk Management Program.

• Making sure that individuals under your supervision are aware of our Code and related policies and procedures.

• Maintaining a workplace environment that encourages candid discussions about ethics issues with no fear of reprisal.

• Refraining from conduct that could be considered an abuse of your position or influence (such as improperly pressuring teammates for personal benefit).

• Treating all reports and ethics complaints confidentially and consistently following company policies and procedures for handling them.

• Reporting and/or escalating concerns of misconduct to the Ethics and Compliance Hotline or Employee Relations.
Reporting conduct complaints and possible violations

Subject to the Notice to Employees in this Code, you must promptly report any knowledge or information about conduct by anyone in the company that you reasonably believe to be:

• A crime or illegal act.
• A violation of law or regulation or policy, including this Code.
• A dishonest act or unethical act, including misappropriation of funds or anything of value from Bank of America, or the improper recording of the company’s assets or liabilities.

You also must report any other circumstances or activities that may conflict with the Code of Conduct.

If you have any questions or concerns regarding the Code of Conduct:

• Consult your manager or Compliance and Operational Risk officer.
• Refer to the Risk & Compliance website for additional information and contacts.
• Contact Employee Relations.

To report complaints or possible violations regarding ethical issues or other inappropriate activity, call the Ethics and Compliance Hotline:

• Employees in the U.S., Puerto Rico and U.S. Virgin Islands call toll-free 888.411.1744.
• For other international employees, toll-free dialing instructions will vary by location. Please see the International Ethics and Compliance instructions.
• All employees can submit a report online at bankofamerica.ethicspoint.com.

Please note that complaints or possible violations can be submitted anonymously and in complete confidence.

Non-retaliation

Bank of America values clear and open communications and respects the contributions of all employees.

You will not be retaliated against for reporting, in good faith and in accordance with this Code, information that you reasonably believe relates to possible misconduct, unethical acts and/or violations of law.

Retaliatory conduct includes discharge, demotion, suspension, threats, harassment and any other manner of discrimination in the terms and conditions of employment because of any lawful act performed in connection with such reporting.

Bank of America takes seriously claims of retaliation against those who report possible misconduct. We will investigate allegations of retaliation, and anyone found responsible for retaliating against anyone who reported possible misconduct to the Ethics and Compliance Hotline or any other channel is subject to disciplinary action, up to and including termination of employment and possible legal action.

Due to strict data privacy laws, particularly in the European Union, employees working outside the U.S. may be subject to certain limitations on reporting to the Ethics and Compliance Hotline. If you are outside the U.S. and are seeking to report issues which the Ethics and Compliance Hotline is not permitted to receive, you will be notified accordingly and advised of alternative ways to raise your concerns. If you would like further guidance on this, consult your local policies and procedures on reporting, or contact your local Compliance and Operational Risk department, and they will be able to advise on the rules applicable to you and appropriate local reporting channels.

For individuals in the UK, concerns of inappropriate activity by the Bank or its employees can be reported directly to the Financial Conduct Authority (FCA) or the Prudential Regulation Authority (PRA) or the Central Bank of Ireland (CBI). Reporting to the FCA/PRA/CBI is not conditional on a report first being made internally.

It is possible to report internally and to the FCA/PRA/CBI (simultaneously or consecutively). For more information, please refer to the UK Whistle-blowing Policy and the Ireland Whistle-blowing Protection Policy. Finally, employee should also be aware that it is possible to report certain breaches of European Union law to the European Central Bank (ECB) via its whistleblowing platform.
We manage risk well

Managing risk is central to everything we do. That’s why, no matter where we work in the organization, managing risk well is foundational to fulfilling our purpose and values — and delivering responsible growth.

Our Risk Framework provides an understanding of our approach to risk management and each employee’s responsibilities for managing risk, promoting a culture that:

- Instills the importance of managing risk well.
- Ensures appropriate focus on risk in all activities and that risk is everyone’s responsibility.
- Encourages the necessary mindset and behavior to enable effective risk management.
- Promotes sound risk-taking within our risk appetite.

Individual accountability means understanding the risk and reward in all we do to ensure we are there for our customers, clients, communities and shareholders — in good and bad times. We do this by:

- **Taking ownership** — Hold yourself and each other accountable to live our values, act responsibly and be proactive in finding and fixing issues. Make decisions as if your own reputation were on the line.
- **Using your voice** — Speak up and foster an environment where others feel comfortable sharing their concerns. Encourage and recognize those who bring attention to potential risks. Employees are encouraged to notify their managers immediately upon identifying a potential risk. They can also share any risk-related concerns with those above their managers or with their partners in Global Risk Management or Corporate Audit.
- **Being intellectually curious** — Openly and regularly engage colleagues in conversations about risks. Challenge one another, think objectively and work together to make smart decisions.

When we all take personal ownership of risk management, it contributes to the strength and sustainability of our company and supports the work we do to serve our customers, clients, communities, shareholders and employees. For more information, please refer to the Risk Framework.
We act ethically

Sustaining our culture of managing risk well throughout the company is critical to our success and our efforts to drive responsible growth. Growing responsibly is supported by our commitment to act responsibly, which means that as we help make financial lives better for our customers and clients, we must always conduct ourselves with fairness, honesty and integrity.

Conflicts of interest

Bank of America’s employees face actual, potential and perceived conflicts of interest on a regular basis during the normal course of business. A conflict of interest may occur when your personal interests, or the activities you perform on behalf of the company, interferes or appears to interfere with the company’s, shareholder’s or a client’s best interest. A conflict can arise when you take action or have interests that make it difficult to perform your company work objectively. We must take reasonable steps to identify, mitigate, disclose or restrict business activities or practices that may pose a conflict. Some of the potential conflicts of interest that you must be aware of are:

- Bribery and Corruption
- Gifts and entertainment
- U.S. political contributions and activities
- Personal relationships among employees
- Gifts among employees
- Interactions with government employees (Federal, State and Municipal)
- Outside business activities
- Activities outside of work
- Interaction with third parties
- Charitable contributions (personal or company-funded)
- Corporate opportunities

Considerations for identifying potential conflicts of interest:

You are responsible for identifying, managing and escalating (to your manager or Compliance and Operational Risk officer) actual, potential or perceived conflict in accordance with applicable regulatory requirements and Bank of America policies, including this Code. For additional information, refer to the Conflicts of interest — Enterprise policy. Some general considerations for identifying potential conflicts of interest:

- **Perception:** Could the activity or transaction be perceived as a potential conflict by others?
- **Intent:** Is the offer or request an attempt to influence the recipient’s or your judgment?
- **Impact:** Will the company, its employees, its shareholders or its customers be disadvantaged or negatively impacted if you participate in the activity?
- **Objectivity:** Will your participation in the activity affect a customer’s or your judgment or your ability to be objective with regard to any business decision?
- **Time considerations:** Will the time required by an outside business activity or outside interest interfere with your ability to effectively carry out your job responsibilities to the company, its shareholders or its customers?
Bribery and Corruption
You may not give, promise or offer money or anything of value to any customer, government employee or any other person for the purpose of improperly influencing a decision, securing an advantage or obtaining or retaining business. If you engage in such behavior, you expose yourself and the company to potential regulatory, civil and/or criminal liability and significant reputational harm, and you undermine the trust of our customers, shareholders and communities.

Gifts and entertainment
Providing gifts and entertainment, including promotional items, is often customary in the financial services industry; however, many countries have rules that regulate these activities. You must adhere to such rules to avoid impropriety or the appearance of impropriety that could expose Bank of America to civil or criminal liability or threaten the public’s trust in Bank of America.

A conflict of interest may arise when you give or receive gifts or entertainment to or from clients, prospects or third parties. You must ensure that the exchange of gifts or entertainment is reasonable and for a legitimate business purpose (unless personal in nature), and is in compliance with our enterprise and local policies.

You are prohibited from providing or receiving gifts or entertainment that are so lavish, frequent, or excessive that could be perceived as improper. Your gift and entertainment activities may be restricted to specific dollar limits (or local currency equivalents) and/or subject to certain preapproval thresholds. Please confirm your obligations with your Compliance and Operational Risk officer and refer to the ABAC Gifts and Entertainment — Enterprise Policy for specific requirements.

U.S. political contributions and activities
In general, you may make personal political contributions, within applicable legal limits, to candidates, parties and committees. Because of industry regulations and federal, state or local laws, employees of particular businesses, or who have certain coverage responsibilities, may be restricted from making some political contributions or engaging in certain political activities. Please confirm with your Compliance and Operational Risk officer and refer to the ABAC — U.S. Political Activities — Enterprise policy for additional information.

Under no circumstance may you coerce or pressure other employees to make political contributions. Employees may not make use of any company assets or personnel to engage in political fundraising or solicitation activities on company premises. For more information, visit the Anti-Bribery and Anti-Corruption website.

You can also visit the Gifts and Entertainment FAQ page and the U.S. Political Activities FAQ page to browse answers to frequently asked questions.
Interactions with government employees

You must not offer, give or promise to give money or anything of value to any employee of any government, agency, state-owned or controlled enterprise, political party or candidate for political office if it could be perceived as a conflict of interest or suggestion of a quid pro quo. Interactions with government entities and their employees may expose the company and its employees to various public policy, legal and compliance risks. You must obtain preapproval from your manager and Compliance and Operational Risk officer for any gifts and entertainment provided to government officials.

Please review the ABAC Gifts and Entertainment — Enterprise Policy for additional information including types of government entities/employees covered under the policy. You are expected to be particularly vigilant when interacting with government employees and must not engage in behavior that could be seen as being intended to improperly influence a Bank of America business relationship.

Nothing in this section is intended to prohibit employees from filing a complaint with governmental agencies such as the Securities and Exchange Commission, the Financial Industry Regulatory Authority, Inc., the National Labor Relations Board (NLRB), the Occupational Safety and Health Administration (OSHA), and similar regulatory entities. Refer to the Notice to Employees in this Code for further guidance.

Personal relationships among employees

While you may have a personal relationship with someone who also works at Bank of America, it is important that hiring decisions, reporting relationships and other terms and conditions of employment (e.g., granting time off, adjusting schedules or other potentially favorable work arrangements) avoid any conflict of interest, or the appearance of a conflict of interest.

A real or perceived conflict of interest may arise if you have a personal relationship with another employee where either party has direct or indirect influence over the other party’s employment, compensation, approval authority, chain of custody or work conditions. Examples of personal relationships include, but are not limited to, those of a family member, close friend, intimate or romantic partner, roommate, babysitter and/or renter/landlord. Further, you must avoid workplace relationships that would create a conflict of interest. For example, managers are prohibited from dating or having a sexual relationship with subordinates, or anyone in the their chain of command. Escalate to your manager and HR or Employee Relations if you have a personal relationship that could create such a conflict, or if you are unsure whether a particular personal relationship creates a conflict.

Note: Merrill Lynch Wealth Management follows line-of-business-specific guidelines regarding employment of relatives. Please contact your manager, Employee Relations or Advisory Online for additional information.

1 For the purposes of this Code, “family member” includes a spouse or domestic partner, child (including by adoption), parent, grandparent, grandchild, cousin, aunt, uncle, sibling, parent-in-law, brother-in-law or sister-in-law of the employee or the employee’s spouse or domestic partner, step relationships of the aforementioned or individuals residing in an employee’s home.
Gifts among employees

A conflict of interest may arise when you provide or receive gifts to or from another employee, and especially when gifts are exchanged among employees in the same reporting line or in positions of influence. Employees must exercise good judgment to ensure that any gift is reasonable for the occasion, and is not lavish or so frequent to create any appearance of a conflict of interest or be perceived as compensation or reward for job performance.

Note that you may provide gifts in connection with life events (e.g., weddings, birthdays, births) where the circumstances make it clear that it is the life events — rather than Bank of America’s employment relationships — that are the motivating factors for giving the gifts.

Outside business activities

A conflict of interest or other risk may arise from activities, employment or other relationships conducted outside your role with Bank of America. You must not act on behalf of or appear to represent the company in any business transaction outside your role and responsibilities with Bank of America. You must inform your manager and obtain all required approvals prior to engaging in an outside business activity.

You are permitted limited use of Bank of America resources while pursuing such outside business activities and relationships (including but not limited to physical space, supplies, communication methods or time). However, you must not allow any outside business, civic or charitable activities to interfere with your job performance. With few exceptions, Bank of America generally discourages employees from serving on a board of a for-profit organization in a personal capacity, particularly the board of a public company, and additional approvals are required.

For more information, and to review disclosure and approval requirement related to outside business activities or outside directorships, please visit the Outside Business Activities website or any applicable line-of-business-specific guidelines.

Q: I would like to work part time on the weekends at a local department store to make extra money for the holidays. Is this a conflict?

A: Before starting a second job, you must obtain your manager’s approval. Additional approval and reporting may also be required. For additional information and guidance, please visit the Outside Business Activities website. The second job must not interfere in any way with your job performance at the company.

Q: I’ve been asked to serve on the board of a local nonprofit organization. Do I need to report this?

A: You must obtain approval from your manager before serving on a board of an organization, whether a for-profit or a nonprofit entity. Additional approval and reporting may also be required. For additional information and guidance, please visit the Outside Business Activities website.
Activities outside of work

We are all expected to act in a manner consistent with high standards of professional conduct that merits public trust and confidence.

You must be aware that your actions outside of work have the potential to impact Bank of America’s reputation/brand, customer relationships, co-worker relationships or your role. If your actions outside of work are associated with Bank of America, even if the association is unintended, a real or perceived conflict of interest or conduct issue may arise, especially if the actions conflict with our values or this Code of Conduct.

Actions outside of work that create a real or perceived conflict of interest, excluding protected speech involving terms and conditions of employment, could lead to disciplinary action up to and including termination.

Interactions with third parties

A conflict of interest may arise from relationships with third parties or other service providers. If you are authorized to approve or award orders, contracts, commitments or engagements to third parties of goods or services, you must do so based on objective business standards to avoid any real or perceived favoritism. Interactions between employees of Bank of America and third parties, who may also be Bank of America clients, must be conducted in accordance with all applicable Bank of America policies and principles of arm’s-length transactions.

Charitable contributions

A conflict of interest may arise from a contribution made to a charitable organization at the request of a client or vendor as a means to maintain or induce business, or when an employee asks a client or vendor to give to a charitable organization in exchange for reduced fees, favorable terms, products or services. A perceived conflict can also occur when a contribution is made by an employee to a charitable organization that is a direct client and/or a charity board member who is a direct client of the employee, or a charitable organization that is associated with a government employee.

Corporate opportunities

You also have a duty to the company to advance its legitimate interests when the opportunity to do so arises. Accordingly, you must not deprive the company of an opportunity by:

• Competing with the company or using corporate property, information or your position for personal gain.
• Taking for yourself an opportunity that is discovered through the use of corporate property or belongs to the company, or helping others do so, if they are in a position to divert a corporate opportunity for their own benefit.

Q: I have given a yearly donation to the local chapter of my favorite charity for the past five years. I just learned that one of my clients has been asked to join the board of directors. Can I continue to give to this charity?
A: Yes. You have a history of giving to this charity prior to your client joining the board of directors.

Q: My client is starting a new charity and has asked for a donation of $500. Can I give to this charity?
A: Possibly. The facts and circumstance of the request and the size of the donation should be reviewed with your manager and/or Compliance and Operational Risk officer prior to the donation.
We are fair and honest in our communications

Responding to media inquiries

We work to both advance and protect the Bank of America brand through engagement with the news media as part of our larger marketing, communications, public policy and corporate affairs activities. If you are contacted or approached by a reporter or member of the media and asked to speak on behalf of the company, you should direct them to the Journalist Resources section of the Bank of America newsroom. Only employees designated by Bank of America’s Media Relations staff are authorized to speak with the media as spokespersons for and on behalf of the company.

If you anticipate speaking or communicating with the media on behalf of the company, including social media, you must obtain approval from a member of the Media Relations team and comply with applicable line-of-business-specific policies and procedures.

This includes requests for information or comments on behalf of the company about company business, plans or strategy, organizational or administrative matters, results of operations, or information about the company’s performance. This also includes requests for comments or information on behalf of the company either on an “on-the-record”, “off-the-record,” or “background” basis. Employees acting on behalf of the company are prohibited from giving members of the media access to or a summary of company confidential or proprietary information, such as internal conference calls, webcasts, and internal emails or other written materials or presentations, without prior involvement and approval of the Media Relations Team and the Legal department. These policies are not intended to infringe upon or violate your rights protected under applicable employment, securities, or other applicable laws, rules and regulations. However, you may not disclose proprietary and confidential information learned in the course of employment with the company or any confidential customer or client information, except as specifically provided in the company’s policies or as described in the Notice to Employees in this Code. If you are contacted by the media regarding non-company issues where the situation could reflect negatively on the company as your employer or result in high-profile media attention, you must alert your manager and Media Relations. While these situations don’t directly involve the company, the media could highlight your affiliation with the company, resulting in questions for you and Media Relations, and create reputational risk to the company.
Electronic communications and social media

Electronic communications help us improve overall business efficiency and are an important part of how Bank of America does business. Adhering to all applicable electronic communications policies preserves customer trust, protects our brand and minimizes risk.

We are all responsible for utilizing approved communication devices and applications for sharing company information, including information that may be material, nonpublic, confidential or private.

All electronic communications activities (e.g., email, text, instant messaging, voice, video, collaboration tools and web conferencing) using internal and external systems, devices, tools and applications are, to the fullest extent permissible by law, subject to monitoring and retention by or on behalf of Bank of America.

You are permitted limited personal use of company-managed devices and applications, the internet and email for personal communications. The use of the resources may be monitored and inspected to ensure productivity is not negatively impacted. Maintain the integrity of the systems (e.g., monitoring for the introduction of malware or inappropriate data transmissions) and avoid activities that may give rise to company liability or risk (e.g., claims of unlawful harassment or conduct). However, all employees are prohibited from using digital text (e.g., non-company-approved mobile applications, instant messaging, SMS text and iMessage) for company business activities on personal devices as the Bank cannot monitor, secure or retain business communications sourced from personal devices.

All electronic communications and social media use (both internal and external) must adhere to the standards of this Code and the Employee Handbook in the U.S. and in countries with an Employee Handbook, as applicable. As with any communication about the Bank, you are reminded to act ethically when using social media. Your behavior on social media can not only affect your personal and professional brand, but also the company’s brand. Social media posts or other content that includes discriminatory remarks, harassment and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject employees to disciplinary action up to and including termination. Additionally, you should be aware of any line-of-business-specific social media policies and other restrictions that you may be subject to due to regulatory requirements. For more information on engaging in social media and other related policies, visit Social media at Bank of America on Flagscape, the “Working at Bank of America” section of the Employee Handbook, as well as the Electronic Communications Retention — Enterprise policy and Electronic Communications Guide.

Q: Are there any restrictions on voice communications?

A: Voice communications on a personal device are permissible provided that the employee is not subject to any voice recording requirements or obligations. Employees subject to any voice recording requirements must be on company-managed devices and should refer to their specific line-of-business requirements.

In the United States and other countries, where permissible, based on local laws and regulations, as applicable, employees should have no expectation of privacy with respect to electronic communications that are transmitted or stored on systems, platforms, hardware or software that are controlled by the company or that are publicly available, including any publicly available social media, whether or not controlled by the company. For questions regarding local laws and restrictions, employees should contact their local Compliance and Operational Risk officer or legal department.
Duty to cooperate

You must fully and truthfully cooperate with any internal or external investigation or audit, or any regulatory examination or request for information. You need to be aware of and comply with any applicable business-specific policies and procedures regarding contact with regulators, which, among other things, may require you to report such contact to either your manager and/or Compliance and Operational Risk officer and/or Global Regulatory Relations. Additionally, you must immediately inform your manager if you are the subject of an external investigation unless laws, regulations or the investigating authority prohibit you from doing so.

Duty to report arrests

All Bank of America applicants are required to pass a criminal background check as a condition of employment. Background checks are conducted only after an applicant receives a conditional offer of employment. As a federally regulated financial institution, Bank of America is prohibited from employing individuals whose criminal history does not meet applicable legal and financial industry rules. Bank of America also conducts an individualized review of criminal history focused on maintaining the safety and soundness of the company. To ensure continuing compliance with these laws and standards, Bank of America may conduct additional criminal background checks at any time during employment. In addition to complying with any line-of-business specific guidelines or industry requirements, unless prohibited by law, you are required to inform the company of any arrest or criminal investigation that arises during your employment, for any offense other than a minor traffic violation, by email addressed to codeofconduct@bofa.com. Arrests and charges will be considered only as required or permitted by applicable law, and disclosure of a pending arrest or charge or resulting conviction will not necessarily disqualify you from employment. If you have any questions regarding compliance with this requirement, you should contact Employee Relations.
We safeguard information

Except as permitted by applicable company policies and subject to the Notice to Employees in this Code, we must keep the following information confidential and secure:

**Customer information**

You must not access or use customer information except for appropriate business purposes, and you must protect the confidentiality and security of the customer information. Our internal privacy and information security enterprise policies and standards provide additional details on your duty to protect and secure customer information, as well as its appropriate use. You should also be familiar with the “Need to Know” principle for all confidential information, including material, nonpublic information (MNPI) related to our corporate clients.

For more information, including guidance on different classifications of data, please visit the Information Security website and the Privacy website under Risk & Compliance on Flagscape and read the Privacy and Cross Border Data Movement — Enterprise Policy, Information Security — Enterprise Policy and Information Wall — Enterprise Policy.

**Supervisory information received from regulatory authorities**

Supervisory information³ received from our regulatory authorities must be treated as confidential. Depending on the agency, such material may be deemed government property that Bank of America is not authorized to share or disseminate without express written consent. Information received from regulatory authorities should be kept secure and not disseminated outside of Bank of America without proper authorization. Such information should only be shared within the company with other employees who “need to know” the information. Consult Global Regulatory Relations if you have questions about these restrictions.

**Bank of America information**

You must keep secure and not disclose confidential or proprietary information about Bank of America, such as business plans, market conditions that may be of use by competitors or harmful to the company or its customers if disclosed, and third party information. Such information should only be shared within the company with other employees who “need to know” the information to perform their duties. Consult your manager if you have questions about sharing information about Bank of America on a “need to know” basis.

**Employee information**

You must not access another employee’s information or use another employee’s information except for appropriate business purposes, and you must protect the confidentiality and security of such information. The Commitment to Protecting Employee Information — Enterprise Policy establishes requirements for how employees, managers and third parties must treat U.S. employee information. Outside the U.S., country-specific Data Protection Notices (DPNs) are in place, which can be provided by your local HR partner or Compliance and Operational Risk officer.

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³ Supervisory information includes any information or materials relating to the examination and supervision of the company by applicable bank regulatory agencies, company materials responding to or referencing nonpublic information relating to examinations or supervision by bank regulatory agencies and correspondence to or from applicable banking regulators.
Third-party information

You must keep confidential and secure any information about the company’s purchase of products or services or other information received by Bank of America from a third party. Sharing such information could result in competitive harm to a third party, provide an improper advantage to a third party’s competitor and violate agreements that Bank of America has with a third party. In some instances, it also might violate the ”Need to Know” principle for MNPI. For more information, please visit Third-Party Management on Flagscape.

Intellectual property of others

We respect the intellectual property rights of others. You must not obtain, use, sell or distribute the intellectual property of others in violation of confidentiality obligations or intellectual property law. Additional information is available on the Intellectual Capital & Property website.
We will not misuse information

Restrictions on trading in securities or financial instruments

If you are in possession of MNPI of any company, you are prohibited from buying, selling, recommending or trading — either personally or on behalf of someone else — securities or financial instruments of that company. Under the securities laws, such activities may constitute insider trading because they involve fraud on securities markets by illegally permitting an individual or company to profit from information not available to the public.

In addition, you must not communicate or disclose such information to others who may misuse it, including family members. Doing so would not only be a violation of your duty of trust or confidence, but also may be a violation of U.S. federal and state laws, as well as the laws of many countries.

You must be familiar, understand and comply with the Information Wall — Enterprise policy and all other policies and procedures that relate to your area of responsibility, paying attention to specific guidance relating to restrictions on the trading of securities and other activities in the event that MNPI is received.

As an employee, you have additional restrictions on trading in Bank of America securities, including:

- If you are a Bank of America director or executive officer or have been designated as an “insider” (“Designated Insider”) by the company, you must obtain approvals before trading in Bank of America securities.

- Bank of America directors, executive officers and Designated Insiders may not engage in hedging, speculative trading or trading in derivative securities with respect to Bank of America securities. This prohibits short sales and trading in puts, calls, prepaid variable forward contracts, equity swaps, collars or exchange funds and other options or derivatives with respect to Bank of America securities.

- Other Bank of America employees must not engage in speculative trading of Bank of America securities. This prohibits short sales and trading in puts, calls and other options or derivatives with respect to such securities, unless such transaction is a bona fide hedge against an existing long position in Bank of America securities (e.g., writing a covered call or purchasing a covered put).

If you have questions regarding the potential speculative nature of your transaction, please talk with your manager, Compliance and Operational Risk officer or legal representative.

For more information, please refer to Additional Guidance While Trading in Bank of America Securities.

What is MNPI or Material, Nonpublic Information?

The definition of MNPI is broad. You should consider information to be material if a reasonable investor would consider it important in making an investment decision (for example, any information that likely would affect the market price of a security or financial instrument if made public). Examples include merger-and-acquisition information, leadership or board-of-director changes, significant cybersecurity breaches and earnings-related and other significant financial information. You should consider information nonpublic if it is not generally available to the investing public.

In other jurisdictions, MNPI is often referred to as “inside information” or “price-sensitive information.” While MNPI and “inside information” or “price-sensitive information” are similar, they are not identical. You should be familiar with applicable business-specific or jurisdiction-specific policies and procedures, and, if in doubt, consult with your Compliance and Operational Risk officer.
We protect Bank of America assets

We must properly care for and protect Bank of America property and assets from theft, loss, carelessness, waste and cybersecurity threats. The Bank’s property and assets should be used efficiently and for legitimate business purposes only.

You must not:

• Steal, embezzle or misappropriate money, funds or anything of value from Bank of America. Doing so subjects you to potential legal or disciplinary action, according to the law and Bank of America policy.

• Use Bank of America assets for personal gain or advantage. This includes personal use of confidential or proprietary information that you learn through your employment.

• Remove Bank of America assets from the facilities unless you are authorized to do so or have your manager’s approval.

• Use official Bank of America stationery, the corporate brand, documents or the Bank of America name for commercial gain.

• Misuse your internet, phone or email privileges. See the Electronic communications and social media section of this Code for additional information.

You are expected to safeguard company-issued hardware, software and devices against theft, loss or unauthorized use. You must protect your login credentials and use caution when opening email attachments or clicking on links as these can introduce significant malware risk to the company. You should promptly report to Infosafe any of the following incidents, whether suspect or actual:

• Data compromises, misdirected emails or lost documents

• Unauthorized attempts to access our network or workspaces

• Lost or stolen electronic equipment or badges, including permitted personal devices used to conduct business (e.g., smartphone)

• Social engineering, such as impersonation of a customer or employee

• Unauthorized access or upload of confidential or proprietary data

• Unusual database or system log anomalies
Bank of America assets include, but are not limited to:

- Computer hardware and software innovations
- Data processing systems
- Equipment
- Files

- Customer lists or information
- Money and funds
- Reference materials
- Supplies

- Intellectual property
- Databases
- Furnishings
- Ideas
- Technology

- Records
- Reports
- Equipment
- Reference materials
- Files

- Information about Bank of America’s business, including corporate or customer transactions
- The company’s information systems and private computer systems, including your email and your internet access

Bank of America intellectual property

In accordance with the Proprietary Rights and Information Agreement, any and all assets you create for Bank of America or while using Bank of America resources are the company’s property, and remain its property even if you leave Bank of America.

For additional information, visit:

- Intellectual Capital & Property
- Records Management

Q: Can I leverage materials from my previous employer at Bank of America?

A: You may not use, reference or distribute any materials from prior employers at Bank of America. Examples include, but are not limited to, playbooks, manuals, software code, analytical models, and any other non-public information. You also cannot leverage Bank of America materials at any future employers. For additional information and guidance, please visit the Proprietary Rights & Information Agreement.
We conduct our financial affairs responsibly

You should conduct your personal financial affairs responsibly and keep your business expenses in order. You are responsible for your financial activities in the following areas:

**Personal borrowing and lending**

To avoid potential conflicts of interest, you may not personally borrow money from or lend money to customers or vendors, unless the loan is a transaction with an institution normally in the business of lending and is obtained in non-preferential terms.

In addition, borrowing money from or lending money to other employees (unless they are family members) is not permitted. The occasional loan of nominal value (such as for lunch, dinner or a social event that is promptly reimbursed) is acceptable, as long as no interest is charged.

**Business expenses**

You must report your business expenses accurately and in a timely manner. You also must not use business credit cards for any purpose other than appropriate business expenses.

You may not make business purchases directly from or (unless specifically authorized) enter into contracts on behalf of the company with third parties, because the company has established requirements for efficient and compliant purchasing, contracting and payments for products and services acquired from third parties.

More information on appropriate business expenses and purchasing channels is available in the Employee-Initiated Expense — Enterprise Policy, the Third Party — Enterprise policy, Employee Expense Reimbursement Standard and the Purchasing and Payments Compliance Standard Operating Procedure.

**Personal accounts and fees**

Misuse of Bank of America personal accounts and banking services (e.g., personal debit or credit cards issued through the bank), as outlined in the Employee Handbook, is prohibited. Additionally, you may not process transactions (e.g., refunding fees) unless you are permitted under existing policies to do so. Further, accepting personal fees or commissions for any transaction on behalf of Bank of America unless you are specifically authorized to do so is prohibited.
We comply with laws and regulations

You must not take any action, either personally or on behalf of Bank of America that violates any law, rule, regulation or internal company policy or procedure.

Anti-money laundering and economic sanctions

Money laundering is the process by which criminals attempt to make “dirty” money (derived from unlawful activities) look “clean” (as if from legitimate sources) by moving it through a financial institution.

Economic sanctions are foreign policy tools that impose strict limits on a range of activities, including providing financial services or conducting transactions. They are imposed by governments or international bodies to try to isolate or impede a specified individual, entity or jurisdiction for some specified purpose or activity.

These rules target people such as criminals who engage in activities that harm us and our communities (e.g., human trafficking, corruption, drug trafficking, fraud, wildlife trafficking and financing terrorism), as well as those who threaten national security.

We all have a role to play in helping to prevent criminals and targets of sanctions from using Bank of America’s products and services. This includes an obligation to know our customers, identify and escalate suspicious activity, and escalate transactions with sanctioned countries, people or businesses. Learn how to do your part by visiting Financial Crimes under Risk & Compliance on Flagscape.

We must comply with anti-money laundering rules and economic sanctions, as we have an important role in allowing investigators to follow the money and to prevent criminals and sanctions targets from being able to access their funds.

Regulators around the globe have fined financial institutions billions of dollars for failing to meet their obligations under these rules.

Q: Where can I find information about identifying and reporting unusual or potentially suspicious activity?

A: Learn more about financial crimes on the Financial Crimes page under Risk and Compliance on Flagscape and about how to report potentially suspicious activity through The Referral Management System (TRMS).
Facilitation of tax evasion

Bank of America may be exposed to reputational harm, or potential civil and criminal liability, if those providing services (e.g., employees, agents, service providers and vendors) facilitate the evasion of taxes while working on behalf of the company.

Tax evasion is dishonest non-compliance with tax rules (e.g., intentionally or recklessly not reporting income or capital gains, or not paying taxes owed). This should be distinguished from “tax planning,” which involves neither dishonest conduct nor non-compliance.

Facilitation of tax evasion may occur where you become aware that a client (a corporate entity or an individual) dishonestly intends to evade paying the correct amount of tax and, either through your own conduct (such as the advice you give) or by intentionally turning a blind-eye to dishonest conduct, you knowingly assist the evasion of taxes. This situation could arise in several ways but, as examples: as part of your role in structuring a transaction or setting up accounts you assist someone to evade payment of tax; or you are asked to remit money in an unusual way for the purpose of evading required tax obligations.

You are expected to be informed of and alert to this issue to ensure that you do not knowingly assist the evasion of taxes. Questions or concerns regarding the possible facilitation of tax evasion should be raised with your Compliance and Operational Risk officer, and any knowledge or suspicion of tax evasion must be reported to Global Financial Crimes.

4 The U.K. government, for example, has created offenses for corporate entities, such as the Bank and its subsidiaries, which make an entity criminally liable if someone acting on its behalf facilitates the evasion of taxes (wherever globally they may be payable).
Books and records

Accurate record keeping and reporting reflects on our reputation, our integrity and our credibility, each of which promotes the interests of our shareholders. You must maintain accurate books and records including, but not limited to, any system of record for customer transactions, bank financial records, etc., consistent with business needs and legal requirements. See the Global Records Management—Enterprise Policy and the Global Records Management Standards for additional information.

All employees responsible for the preparation of the company’s financial statements, or who provide information as part of that process, must maintain and adhere to internal accounting and operating controls and procedures so that all underlying transactions, both within Bank of America and with third parties, are properly documented, recorded and reported.

In addition, we all have the responsibility to promote full, fair, accurate, timely and understandable disclosure in reports and documents that Bank of America files with or submits to regulators or other public communications.
We value each and every teammate

Diversity & inclusion

Our commitment to diversity and inclusion helps make our company a great place to work. The diversity of our employees — in thought, style, age, sexual orientation, gender, gender identity, race, culture, disability, religion and experience — makes us stronger, and is essential to our ability to serve our clients, fulfill our purpose and drive responsible growth.

Our diversity also provides fresh ideas and perspectives and, when coupled with inclusion, results in an innovative environment where employees can bring their whole selves to work, build careers and contribute to the responsible growth of our business.

We are honored to be recognized as a leader in diversity and inclusion, for our representation, progressive workplace practices and initiatives to promote inclusion. Visit Diversity and Inclusion on Flagscape for more information.
Discrimination and harassment

At Bank of America, we are committed to promoting an inclusive and respectful work environment. Discrimination and harassment are unacceptable and contrary to the company’s values. The bank does not tolerate unlawful discrimination or harassment of any kind, including but not limited to verbal, physical, visual, sexual and abusive conduct (bullying) as outlined in our Harassment and Discrimination Prevention Policy.

These expectations apply in the workplace, which includes events sponsored by the company or when you are engaged in business on behalf of the company or at other outside activities with a connection to employment or work (e.g., social activities with teammates, or recognition events), whether during or after normal business hours. Outside business activities, including entertainment, must not be conducted at establishments where sexually explicit or other inappropriate entertainment is offered.

You should not tolerate discrimination or harassment and should report any such conduct experienced or observed to your manager, Human Resources/Employee Relations and/or the Ethics and Compliance hotline. Reported incidents of prohibited behavior and/or retaliation will be investigated. Investigations are conducted thoroughly and in as discreet a manner as is possible based on the situation. If the company finds violations of this policy or other inappropriate conduct of a sexual, discriminatory or retaliatory nature has occurred, disciplinary action up to and including immediate termination from employment may result.
Workplace violence

Bank of America strives to provide a safe work environment in which employees treat each other with courtesy and respect and resolve any differences in a professional, non-abusive and non-threatening manner. Workplace violence is prohibited and includes acts or threats of physical violence, but it also can include abusive conduct or behavior, such as harassment and bullying. Possessing weapons, whether licensed or not, in the workplace or while engaged in business on behalf of the company is prohibited. We are all responsible for our behavior and for understanding how our conduct both inside and outside the workplace may impact others. We all have a responsibility to report inappropriate behavior before it escalates to violence in the workplace—if we see something, we say something. Please contact Human Resources if you need assistance.

Additional information can be found within the Violence-Free Workplace Policy.

Domestic violence

Bank of America is committed to supporting employees experiencing difficulties because of domestic violence. Domestic violence is a pattern of abusive behavior that is used by one partner to gain or maintain power and control of another intimate partner. Employees who require assistance in dealing with the impacts of domestic violence are encouraged to contact Human Resources, including the Life Event Services Domestic Violence Support Team, or Corporate Security. The company also prohibits the misuse of company property, vehicles, telephones, computers or the assistance of another employee to commit acts of domestic violence, including stalking, harassment or threats. Employees may contact the U.S. Life Event Services Domestic Violence team for support at lifeeventsupport@bankofamerica.com and learn more about Life Event Services on HR Connect. Additional information can be found within the Violence-Free Workplace Policy.

Workplace safety

We are committed to the safety and security of our teammates around the globe. In order to avoid risk to yourself or those around you, you must follow all applicable safety and security procedures, as well as applicable laws and regulations. You should report unsafe working conditions to your manager or Compliance and Operational Risk officer. For additional information, visit the Safety and Security website.
Business continuity

Our business continuity program focuses on placing the highest priority on the physical safety and security of our customers and employees, while preparing for loss of facilities and technologies. The goal is to provide uninterrupted service to customers and clients by recovering critical business functions and applications. For additional information, please visit the Business continuity and recovery website.

Safety and business continuity is everyone’s responsibility. You must:

• Know the emergency response procedures for your building.
• Keep your personal contact information updated within Workday.
• Talk with your manager before a business interruption occurs so you understand your role in recovery. Stay in contact with your manager during and after disaster events.
• Maintain personal awareness and readiness for disaster events that may affect your area. Follow directions from local authorities during disaster events.
• Keep key contact information readily available at all times.
• Save Emergency Notification and Associate Communication Tool (ENACT) as a contact on your mobile phone(s) and respond appropriately to ENACT messages (you may be asked for your Person Number).
• Call the 24/7 security hotline (SOACC) to report life safety and security incidents, robberies, building security issues or any suspicious activity.
We focus on growing responsibly

At Bank of America, we are driving responsible growth with a strong focus on Environmental, Social and Governance (ESG) leadership. This enables us to serve clients, deliver long-term value through sustainable results to our shareholders, and address some of society’s greatest challenges. Our focus on ESG enables us to drive opportunities and manage risks across our company, helps us define how we mobilize our capital and resources, and informs our business practices and how and when we use our voice in support of our values. Through our commitment to ESG principles, we build trust and credibility as a company people want to work for, invest in and do business with.

Integrated across our eight lines of business, our ESG focus reflects our values, ensures we are holding ourselves accountable, presents tremendous business opportunity, and allows us to create shared success with our clients and communities.

For additional information on our ESG initiatives, visit the Environmental, Social and Governance website in Flagscape, our Annual Report and Proxy Statement.

Human rights

Bank of America is committed to respecting human rights and demonstrates leadership in responsible workplace practices across our enterprise and in all regions where we conduct business. We aim to align our company’s policies and practices with international standards. Our commitment to fair, ethical and responsible business practices, as we engage with our employees, clients, vendors and communities around the world, is embodied in our values and Code of Conduct. For additional information, please read our Human Rights Statement.
In conclusion

Thank you for taking the time to review our Code of Conduct. Remember, the decisions you make on a daily basis can make an impact on our reputation. Please use this Code as a guide to help uphold our ethical standards. If you have questions about our Code or policies or need additional guidance, please reach out to your manager or contact your Compliance and Operational Risk officer or Employee Relations.

Policy and resource closer look

See below for an alphabetical list of the policies and resources referenced in this Code:

Policies

ABAC Gifts and Entertainment — Enterprise policy
ABAC U.S. Political Activities — Enterprise policy
Commitment to Protecting Employee Information — Enterprise policy
Electronic Communications Retention — Enterprise policy
Employee Initiated Expense — Enterprise Policy
Global Records Management — Enterprise Policy
Harassment and Discrimination Prevention — Enterprise Policy
Information Security — Enterprise Policy
Information Wall — Enterprise Policy
Ireland Whistle-blowing Protection Policy
Privacy and Cross Border Data Movement — Enterprise Policy
Third Party — Enterprise Policy
UK Whistle-blowing Policy
Violence Free Workplace — Enterprise Policy

Other Resources

Additional Guidance While Trading in Bank of America Securities
Annual Report
Anti-Bribery and Anti-Corruption site
Bank of America newsroom
Business continuity and recovery
Central Bank of Ireland (CBI)
Code of Conduct mailbox
Conduct Risk Management Program
Conflicts of Interest — Enterprise Policy
Data Protection Notices (DPNs)
Diversity and Inclusion site
Electronic Communications Guide
Employee Expense Reimbursement Standard
Employee Handbook
Employee Relations site
Environmental, Social and Governance site
Ethics and Compliance Hotline: bankofamerica.ethicspoint.com
European Central Bank (ECB)
Financial Conduct Authority (FCA)
Financial Crimes site
Global Records Management Standards
Global Regulatory Relations site
HR Connect
Human Rights Statement
Information Security site
Infosafe site
Intellectual Capital & Property site
International Ethics and Compliance Hotline
Life Event Support
Media Relations Contacts
Outside Business Activities site
Privacy site
Prudential Regulation Authority (PRA)
Purchasing and Payments Compliance Standard Operating Procedure
Risk & Compliance site
Risk Framework
Records Management site
Safety and Security site
Security Operations Analysis Command Center (SOACC)
Social media at Bank of America
The Referral Management System (TRMS)
Third Party Management site
Workday