Country by Country Reporting

Bank of America Merrill Lynch International Designated Activity Company

Year ended December 2018

Country by Country Reporting – Bank of America Merrill Lynch International Designated Activity Company

Nature of activities and geographical location

Country by Country Report of Bank of America Merrill Lynch International Designated Activity Company ("Bank of America Merrill Lynch International DAC", "BAMLI DAC", the "Company") for the year ended 31 December 2018.

The Company is a registered bank in the Republic of Ireland which is authorised and regulated by the Central Bank of Ireland ("CBI"). The Company is a wholly owned subsidiary of Bank of America, National Association (“BANA”) and the ultimate parent of the Company is Bank of America Corporation (NYSE:BAC) ("BAC").

On 1 December 2018, BANA, the immediate parent company of both Bank of America Merrill Lynch International Limited ("BAMLI Ltd"), and BAMLI DAC, merged BAMLI Ltd into BAMLI DAC by means of ‘merger by acquisition’ (Irish Merger Regulations), utilising the European Union (“EU”) Cross Border Merger Directive (the "CBM”) to create a scalable EU-domiciled credit institution owned by BANA. The merger was undertaken as part of the BAC response to the expected 2019 UK exit from EU membership.

Prior to the merger, BAMLI DAC operated its head office in Dublin and a single branch in London. The merger resulted in the addition of seven branches across Europe (Frankfurt, Amsterdam, Brussels, Paris, Zurich, Madrid and Milan) and ownership of a subsidiary in the UK, Merrill Lynch (Camberley) Limited.

The principal activity of the subsidiary is to be an owner of a data centre.

Registered address of BAMLI DAC : Two Park Place, Hatch Street, Dublin 2, Ireland. Contact Number: +353 1 243 8500

Country by Country reporting for the year ended December 2018

Jurisdiction	Net operating income	Profit/ (Loss) before tax	Total Tax paid	Corporation tax paid	Social security paid	Irrecoverable VAT	Average number of employees
2018	$000's	$000's	$000's	$000's	$000's	$000's	
Republic of Ireland	45,714	(12,675)	2,496	0	2,175	322	72
United Kingdom (including subsidiaries)	192,817	89,705	18,469	7,815	4,524	6,130	351
France	4,281	(7,073)	1,040	0	1,040	0	8
Germany	1,698	441	1,431	1,302	103	26	7
Netherlands	2,090	412	42	0	34	7	2
Spain	5,120	2,529	277	128	77	73	5
Italy	2,401	293	146	0	50	95	5
Switzerland	2,595	2,985	0	0	0	0	3
Belgium	490	99	31	0	18	13	1
Consolidated	(5,116)	(628)	0	0	0	0	0
BAMLI Consolidated Total	252,090	76,088	23,932	9,245	8,021	6,667	454

Notes relating to the above table are included on page 4.

Basis of preparation

The table above contains the following for BAMLI DAC for the year ending 31 December 2018:

- BAMLI DAC prepares its financial statements in accordance with Irish law and regulations. Irish company law requires the directors to prepare the financial statements for each financial year. Under the law, the directors have elected to prepare the financial statements in accordance with the Companies Act 2014 and Financial Reporting Standard 101 'Reduced Disclosure Framework'.

- CBCR has been prepared in accordance with Country by Country Reporting requirements under the Capital Requirements Directive ("CRD IV") which have been transposed into Irish legislation as Regulation 77 of Statutory Instrument 158 of 2014.

  Regulation 77 requires each institution to disclose annually, specifying, by Member State and by third country in which it has an establishment, the following information on a consolidated basis for the financial year:
  a) Name(s), nature of activities and geographical location;
  b) Turnover;
  c) Number of employees on a full time equivalent basis (FTE);
  d) Profit or loss before tax;
  e) Tax on profit or loss; and
  f) Public subsidies received.

Notes to the Country by Country Report

- Total tax paid shows the total tax BAMLI DAC paid, suffered or were refunded in each country in 2018. The above columns analyse this total into its components.

    - Turnover represents the total operating income, which consists of net interest income, net fees and commissions, dealing profits and losses and other operating income.
    - Corporation tax, Irrecoverable VAT ('Value Added Tax') and social security represent the actual payments or refunds made to the tax authorities during 2018. An element of the payments will relate to prior years and therefore the figures will not represent taxes charged in the period.
    - Corporation tax is lower in certain territories owing to the receipt of tax exempt income and the availability of losses.
    - Social security paid represents the payroll taxes paid or borne by BAMLI DAC based on individual country rules.
    - Irrecoverable VAT suffered has been calculated on the basis of the amounts accrued in the income statement for the period. This is considered to be an appropriate representation of cash paid by the entity. Irrecoverable VAT is the cost borne by BAMLI DAC of only being able to reclaim a proportion of the VAT we incur. The numbers do not include any element of VAT collected from others or reclaimed.

- The average number of employees is an average of monthly total full time equivalent employees, based on employees legally employed by BAMLI DAC excluding contractors and therefore includes only one month of employee data post the CBM. The financial statements include contractors.

- The Profit before tax in Switzerland is higher than Net operating income due to the booking of year end pension adjustments

Independent Auditors' Report to the directors of Bank of America Merrill Lynch International Designated Activity Company in connection with the Country by Country Reporting Schedule for the year ended 31 December 2018

To the Directors of Bank of America Merrill Lynch International Designated Activity Company

Our opinion

In our opinion, the financial information of Bank of America Merrill Lynch International Designated Activity Company (the "Company") as included in the Country by Country Reporting Schedule for the year ended 31 December 2018, is prepared, in all material respects, in accordance with the Basis of Preparation.

We have audited the accompanying financial information of the Company which comprises the Country by Country Reporting Schedule including the Basis of Preparation for the year ended 31 December 2018. The Country by Country Reporting Schedule for the year ended 31 December 2018 has been prepared by management of the Company in accordance with management's basis of preparation (the "Basis of Preparation").

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the financial information section of our report.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Independence

We are independent of the Company in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants (IESBA Code) that are relevant to our audit of the financial information in Ireland. We have fulfilled our other ethical responsibilities in accordance with the IESBA Code.

Emphasis of Matter - Basis of preparation and restriction on distribution and use

We draw attention to the Basis of Preparation of the financial information. The Country by Country Reporting Schedule is prepared to assist the directors to meet the requirements of the Capital Requirements (Country-by-Country Reporting) Regulations 2013. As a result the financial information may not be suitable for another purpose. Our opinion is not modified in respect of this matter.

Our report is intended solely for the benefit of the directors. We do not accept or assume any responsibility or liability to any other party save where terms are agreed between us in writing.

The financial information does not comprise a full set of financial statements prepared in accordance with Generally Accepted Accounting Practice in Ireland (accounting standards issued by the Financial Reporting Council of the UK, including Financial Reporting Standard 101 "Reduced Disclosure Framework", and promulgated by the Institute of Chartered Accountants in Ireland and Irish law).

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Chartered Accountants

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Reporting on other information

The other information comprises all of the information in the Country-by-Country Reporting other than the Country-by-Country Reporting Schedule and our auditors' report thereon. The directors are responsible for the other information. Our opinion on the Country-by-Country Reporting Schedule does not cover the other information and, accordingly, we do not express an audit opinion or any form of assurance thereon.

In connection with our audit of the Country-by-Country Reporting Schedule, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the Country-by-Country Reporting Schedule or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If we identify an apparent material inconsistency or material misstatement, we are required to perform procedures to conclude whether there is a material misstatement of the Country-by-Country Reporting Schedule or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report based on these responsibilities.

Responsibilities for the Country-by-Country Reporting Schedule and the audit

Responsibilities of the directors for the Country-by-Country Reporting Schedule

The directors are responsible for the preparation of the Country-by-Country Reporting Schedule and for the appropriateness of the basis of preparation. The directors are also responsible for such internal control as they determine is necessary to enable the preparation of country-by-country reporting schedule that is free from material misstatement, whether due to fraud or error.

In preparing the Country-by-Country Reporting Schedule, the directors are responsible for assessing the Company's ability to continue as a going concern, disclosing as applicable, matters related to going concern and using the going concern basis of accounting unless the directors either intend to liquidate the Company or to cease operations, or have no realistic alternative but to do so.

Auditors' responsibilities for the audit of the country-by-country reporting schedule

It is our responsibility to report on whether the Country-by-Country Reporting Schedule has been properly prepared in accordance with the Basis of Preparation.

Our objectives are to obtain reasonable assurance about whether the Country-by-Country Reporting Schedule as a whole is free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (Ireland) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of this Country-by-Country Reporting Schedule.

A further description of our responsibilities for the audit of the Country-by-Country Reporting Schedule is located on IAASA's website at: https://www.iaasa.ie/getmedia/b2389013-1cf6-458b-9b8f-a98202dc9c3a/Description_of_auditors_responsibilities_for_audit.pdf. This description forms part of our auditors' report.

Use of this report

This report, including the opinion, has been prepared for and only for the Company's directors. We do not, in giving this opinion, accept or assume responsibility for any other purpose or to any other person to whom this report is shown or into whose hands it may come, save where expressly agreed by our prior consent in writing.

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PricewaterhouseCoopers
Chartered Accountants and Statutory Auditors
Dublin
25 March 2019