

Further information about reporting concerns for individuals outside the U.S.

Due to strict data privacy laws, particularly in the European Union (EU), individuals 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. For additional guidance on local reporting requirements, please consult the applicable local policies in place (including the Australia Whistleblowing Policy, France Whistleblowing Policy, Germany Ethics & Compliance Hotline Notice, Ireland Whistleblowing Policy, India Whistleblowing Policy, Italy Whistleblowing Policy, MLIQ Whistleblowing Policy, Dubai Whistleblowing Policy and the UK Whistleblowing Policy – links below).

Further, it is important to note that the obligation on individuals to report concerns and possible violations is subject to all applicable laws and all data will be dealt with in accordance with the applicable data privacy notices and data privacy legislation (including GDPR).

UK

For individuals in the U.K., please note that concerns of inappropriate activity by the company or its workers 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 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 Whistleblowing Policy and the Ireland Whistleblowing Policy.

Reports to the ECB

Please also note that it is possible to report certain breaches of EU law to the European Central Bank (ECB) via its whistleblowing platform. For further information on when this might be appropriate and how to do it, please refer to the ECB's website.

EU

For individuals in the EU, please note the following:

- You may request an in-person meeting (or a video-conference) to raise your concerns by emailing employeerelationsoperations@bofa.com. In Spain, such meeting will be held within 7 days of your request. You may be asked for your consent to record the meeting so that a formal transcript can be prepared or for notes to be taken of it
- If you are in the Netherlands and would prefer to raise your concerns locally, you should contact David Vanparys (david.vanparys@bofa.com) in the local C&OR team. In addition, you may, at any time before or after you've raised a concern, contact Sylvia Sieber (sylvia.sieber@bofa.com) in the local HR team, for confidential advice and guidance on your concern
- If you are in Greece and would prefer to raise your concerns locally, you may contact the Officer Responsible for the Receipt and Follow-up on Reports for Greece (Carolina Lenis - c.lenis@bofa.com) (the Officer)
- If you are in Italy and would prefer to raise your concerns locally, you should contact your local HR partner

- Receipt of your concerns will be acknowledged within 7 days (unless acknowledging receipt could compromise the confidentiality of the concern, if you are in Spain)
- Where you have submitted your concerns orally, you may be asked to sign off on any notes taken of those concerns (or any transcript if the meeting or call has been recorded) to confirm you are comfortable with their accuracy
- Subject to applicable laws, where your concerns require investigation, that will be conducted by the company's Internal Enterprise Investigations team, the Regulatory Inquiries Group or Employee Relations (as appropriate). In Italy, local HR will be involved in the process. Note that in Italy, individuals may choose to have their concerns investigated locally (with IEI oversight). Confidentiality will be respected during the investigation and at all times as appropriate in accordance with applicable law
- As part of any investigation, you may be asked further questions and/or to provide additional information. Other relevant parties may also be asked further questions or to provide information. Should you wish to provide any further information, this can be done at any time, as can any other relevant party
- During any investigation, the presumption of innocence will be respected for all parties
- If you are affected by an investigation in Spain, you will have the right to be informed of the actions or omissions attributable to you and to be heard at any time. This will happen at the right time and in a way that ensures the investigation's success, not necessarily at the beginning
- In France, Germany, Italy and Spain, local HR (Anne-Sophie Saulnier, Sylvia Sieber, Elena Rosaschino and Natalia Albert respectively) have overall responsibility for the company's whistleblowing arrangements (including the reporting and investigation processes). In Greece, the Officer has overall responsibility for the receipt of reports and will oversee the investigation and reporting process to the extent required. In case another function receives a report, they are required to forward it without undue delay to the Officer, without any modification to its content or disclosure of information that could lead to the identification of the reporting person or any third party mentioned in the report
- In Italy, where a company function other than local HR receives a report of whistleblowing, that company function must: (i) forward the report to local HR within 7 days, (ii) immediately delete the concern received, and (iii) inform the whistleblower that the report has been forwarded to local HR. The person who has received the concern must keep the concern strictly confidential. Failure to comply with these reporting and confidentiality obligations may lead to disciplinary action
- If concerns are raised to any individual or manager, they should be escalated immediately by that individual/manager to local HR (or via the Hotline if appropriate in the jurisdiction). Confidentiality should be appropriately maintained. For any questions regarding whether to escalate something, please contact local HR or local C&OR for guidance
- We will endeavour to provide appropriate feedback on your concerns. If feedback is required by local law, it will be provided within the prescribed timeframes (and in writing if required). In most cases, it will be provided within 3 months (although for example, in Spain, if the investigation is complex, this may be extended to 6 months)
- You may also raise your concerns (simultaneously or consecutively) directly to the relevant competent authorities/applicable regulators (please refer to your local whistleblowing policy for details where applicable). Reporting to the competent authorities/regulators is not conditional on a report being made internally
- Concerns falling within Italian Legislative Decree 231/2001 (including any breach of the Organizational Model implemented in accordance with that decree) must be reported to the 231 Supervisory Body by email, by post or via the Ethics and Compliance Hotline. For any questions on this, please contact local C&OR

- For the Netherlands, please note that the Dutch Central Bank and the Financial Markets Authority have also set up external reporting channels through which any employees, directors and agents of the bank can report directly to them in writing or via telephone. More information on this can be found on their websites (www.dnb.nl; www.afm.nl). This is in addition to any other competent authorities as stipulated by local law
- For Spain, please note that reports can be made to the Independent Authority for Whistleblower Protection at any time (or to the equivalent regional authorities) where permitted by local law
- In Spain, where the matter could constitute a criminal offence, it will be notified to the Public Prosecutor's Office immediately. If the matter affects the financial interests of the EU, it will be referred to the European Public Prosecutor's Office
- In Italy, individuals are encouraged by law to use internal reporting channels for submitting their reports. Reports can be made externally to the National Anti-Corruption Authority (ANAC), or publicly or to the competent judicial authority only where permitted by local law. The Italian Central Bank (ICB) has also set up external reporting channels through which anyone can report directly to them in writing or via telephone. Please refer to ANAC's and ICB's websites for details
- In Greece, reports can be made to the National Transparency Authority or to such other prescribed persons who are the competent authority based on the subject matter of the report. The Bank of Greece has set up external reporting channels through which individuals may submit reports relating to breaches of Regulation (EU) 575/2013 (on prudential requirements for credit institutions and investment firms) and of the Greek Law transposing Directive 2013/36/EU (on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms). This can be done via email or by post.

Country Whistleblowing Policies

- [Australia Whistleblowing Policy](#)
- [Dubai Whistleblowing Policy](#)
- [France Whistleblowing Policy](#)
- [Germany Ethics & Compliance Hotline Notice](#)
- [India Whistleblowing Policy](#)
- [Ireland Whistleblowing Policy](#)
- [MLIQ Whistleblowing Policy](#)
- [UK Whistleblowing Policy](#)
- [Italy Whistleblowing Policy](#)

External Resources

- [Bank of Ireland \(CBI\)](#)
- [European Central Bank \(ECB\)](#)
- [Financial Conduct Authority \(FCA\)](#)

- [Prudential Regulation Authority \(PRA\)](#)
- [Greek National Transparency Authority](#)
- [Bank of Greece](#)
- [Italian National Anti-Corruption Authority](#)
- [Italian Central Bank](#)
- [Dutch Financial Markets Authority](#)
- [Dutch Central Bank](#)
- [Spain](#) Independent Authority for Whistleblower Protection (AAI)