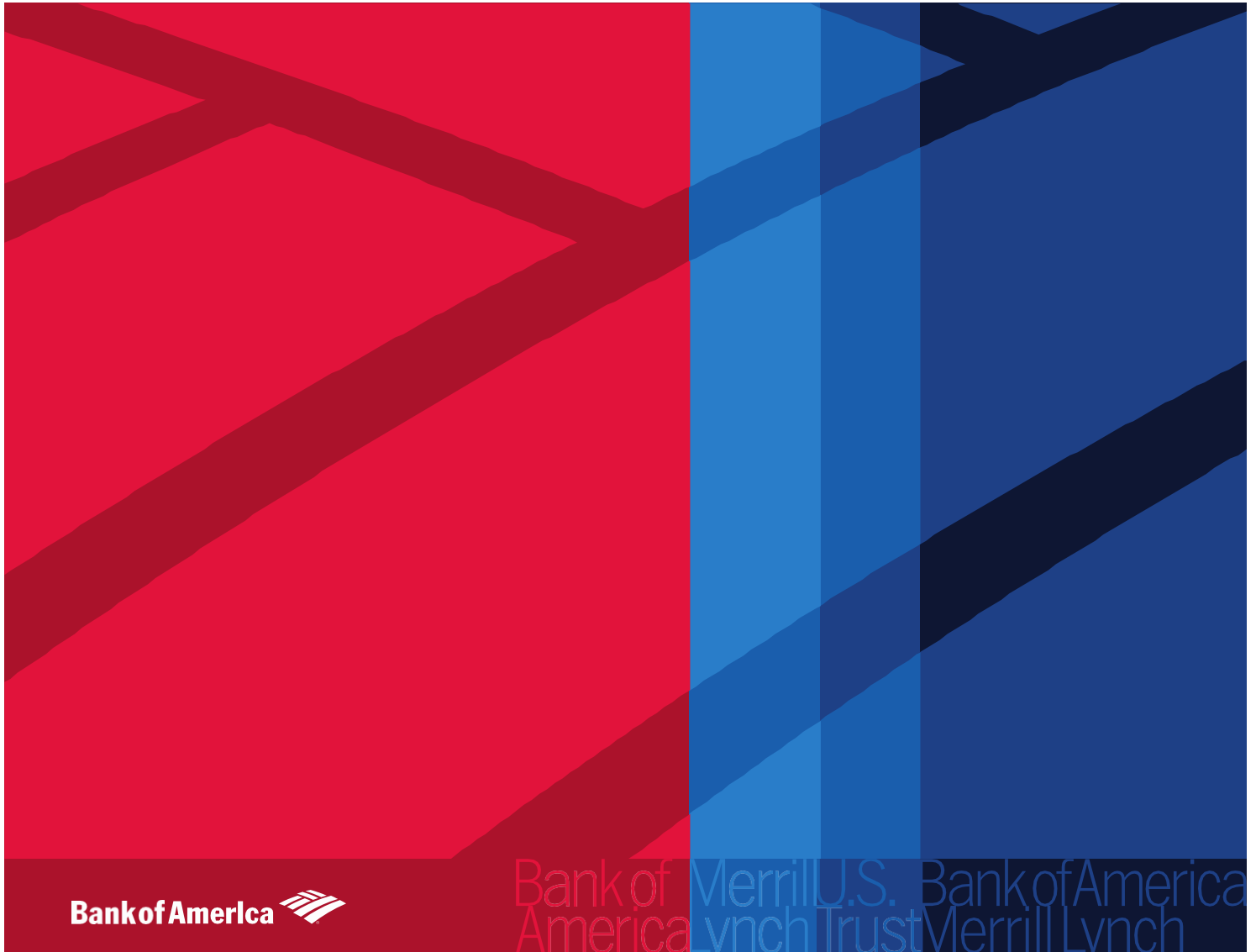


Bank of America Vendor Code of Conduct

Date of Revision: January 3, 2018



Purpose

With a global workforce in more than 40 countries, workplace safety, respect, diversity and inclusion are good for business and enable our company to better serve our customers, clients and shareholders and communities. Likewise, Bank of America (“BAC” or “the company”) expects its vendors to demonstrate their commitments to basic working conditions and ethical business practices.

Operating a responsible and transparent business is critical to BAC’s strength and stability as a company, and is a core obligation to our customers, clients, employees, shareholders and communities. BAC’s management processes, structures and policies help to ensure compliance with local laws and regulations, and provide clear lines of sight for decision making and accountability. Our values and Code of Ethics are designed to foster a culture of openness, in which healthy debate is encouraged, risk is rigorously managed and employees are expected and required to report improper activity.

This vendor code of conduct (“code”) sets forth BAC’s expectations for human rights, labor, and environmental standards throughout our global operations and vendor value chain. The principles contained within this code are guided by the United Nations’ Universal Declaration of Human Rights and the International Labor Organization’s Fundamental Conventions.

Local legal requirements, labor law, and other contractual arrangements with vendors inform the specific applications of this code. In the event of conflict between the terms of a vendor’s contract with BAC and the provisions of this code, the contract terms will prevail.

BAC expects its vendors to conduct their operations in accordance with this code and to enact and enforce policies in support of these principles. Vendors whose policies are in alignment with this code are considered more favorably during the vendor selection process. The elements of the Bank of America Vendor Code of Conduct are as follows:

Governance and Ethical Business Practices

We expect our vendors to aspire to the highest standards of integrity in their business dealings. This includes refraining from any and all forms of illegal or improper activity including corruption, misrepresentation, extortion, embezzlement and/or bribery. We also expect our vendors to disclose any potential conflicts of interest prior to initiating their relationship with Bank of America, or as soon as a vendor becomes aware of a conflict after initiating a relationship, and we expect fair competition among our potential vendors, contractors and subcontractors.

No payments should be made to Bank of America employees or representatives in an effort to influence actions or gain an advantage with the company. Bank of America does not tolerate acts that would be or would be perceived to be bribery or corruption in any form. We expect our vendors to comply with all federal, country, state, provincial and municipal laws including all anti-trust and fair trade policies.

Vendors should not give or offer anything of value to employees, government officials, or other corporate representatives. As well, Bank of America employees are prohibited from soliciting or encouraging gifts from vendors.

Political contributions must not be made on behalf of or as a representative of Bank of America, in an effort to influence a business relationship, or to request influence of a political figure in favor of the company. Vendors must not finance terrorists or those engaged in illicit activities to include money launderers, international narcotics traffickers, and those engaged in activities related to the proliferation of weapons of mass destruction. Vendors must comply with anti-money laundering and anti-terrorist financing laws, rules and regulations.

Supplier Diversity

At Bank of America our commitment to diversity and inclusion is at the core of who we are. The company actively encourages supplier diversity through the use of diverse businesses, based on the categories of goods and services we purchase in the communities we serve. Examples of diverse vendors include: minorities, individuals with disabilities, veterans, women, lesbian, gay, and bi-sexual or transgender. Vendors are expected to integrate and utilize equivalent standards of vendor diversity in their operations and in their subcontractor decisions.

Labor, Human Rights and Social Responsibility

Our success as a company is driven by the people supporting our customers and clients each day. We have set out our Human Rights commitments in the bank's [Human Rights Statement](#).

Bank of America strives to work with vendors whose policies and practices regarding human rights are consistent with our own. We expect our vendors to treat their employees with respect and dignity and protect their human rights. We expect vendors to offer equal employment opportunity to all, to not tolerate discrimination or harassment, and to support diversity and inclusion. We also expect vendors and their contractors and subcontractors to abide by labor laws and regulations in the regions where they conduct business including those that address child labor, forced labor, slavery, human trafficking, equal pay and nondiscrimination in their workforce and not to engage in any practice that could reasonably be considered as employing or encouraging child labor, forced labor, slavery or human trafficking. While Bank of America does not mandate the hourly rate or salaries which our vendors must pay their employees, it encourages our vendors to adopt policies and business practices that are consistent with our core values, including Bank of America's commitment to pay an economically viable wage to its employees. And in all cases, vendors are expected to be in compliance with all federal, state, and local wage and hour laws.

Compliance with Health and Safety Laws

Vendors will provide and maintain for all personnel and stakeholders a work environment that meets or exceeds applicable federal, country, state, provincial and municipal laws regulating occupational safety and health.

Environmental Policy

At Bank of America, we believe environmental stewardship is essential to the sustainability of our business and to the health of the communities where we live and serve. We expect our vendors to operate with this principle in mind, and to measure, reduce and mitigate the environmental impacts of their operations, especially in the areas of energy, water and paper usage, greenhouse gas (GHG) emissions and waste generation.

Vendors should conduct their operations in a manner that protects the environment, to include Bank of America workspaces when providing products and services to our company. Our vendors must also comply with all applicable environmental laws and regulations. If requested by the company, we expect our vendors to make their best efforts to disclose GHG emissions.

As is reflected in our Climate Policy, vendors should incorporate responses to climate change into their core corporate strategies by taking concrete steps to establish and meet GHG emission reduction targets, and/or invest in low and zero GHG products, practices and technologies.

Bank of America strongly encourages our vendors to join us in implementing systems designed to minimize their impact on the environment. We greatly value business relationships with vendors who have developed and implemented internal programs fostering a culture of sustainability and increasing environmental stewardship in their local communities.