

**Bank of America Europe Designated Activity Company**

# **Pillar 3 Disclosure**

For the Half Year Ended 30 June 2022

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# Bank of America Europe Designated Activity Company Pillar 3 Disclosure for the Half Year Ended 30 June 2022

## 1. Overview and Purpose of Document

This document contains the Pillar 3 disclosures as at 30 June 2022 in respect of the capital, leverage and liquidity of Bank of America Europe Designated Activity Company, ("BofA Europe"), an Irish credit institution. This document provides detail on BofA Europe's available Capital Resources ("Capital Resources") and regulatory defined Pillar 1 Minimum Capital Requirement and also details on the MREL and COVID-19 requirements. It demonstrates that BofA Europe has capital resources in excess of these requirements.

In accordance with Article 433a (2) of the EU's Capital Requirements Regulation 2 ("CRR"), BofA Europe is required to disclose the key metrics referred to in Article 447 of CRR on a semi-annual basis.

For further information on BofA Europe's risk management objectives and policies, please refer to BofA Europe's annual Pillar 3 disclosure for the year ended 31 December 2021 on Bank of America's corporate website:

[Pillar 3 report - December 2021](#)

## 2. BofA Europe

BofA Europe is a registered credit institution in the Republic of Ireland which is authorised and regulated by the Central Bank of Ireland ("CBI") and supervised under the Single Supervisory Mechanism ("SSM") by the European Central Bank ("ECB"). BofA Europe is classified as an Other Systemically Important Institution ("O-SII"). BofA Europe's Legal Entity Identifier ("LEI") is EQYXK86SF381Q21S3020.

BofA Europe is a wholly owned subsidiary of Bank of America N.A. ("BANA") and the ultimate parent continues to be Bank of America Corporation ("BAC").

BofA Europe is headquartered in Republic of Ireland with branches in the United Kingdom ("U.K."), Belgium, France, Germany, Greece, Italy, the Netherlands, Spain, Sweden, and Switzerland.

As at 30 June 2022, BofA Europe was rated by Fitch Ratings, Inc ("Fitch") (AA / F1+) and by S&P Global ("S&P") (A+/A-1).

## 3. Basis of Preparation

The Basel Capital Accords provides a series of international standards for bank regulation commonly known, most recently, as Basel III. Basel III was implemented in the European Union through the Capital Requirements Directive and the Capital Requirements Regulation (amended by the Capital Requirements Regulation 2 ("CRR")).

This legislation consists of three pillars. Pillar 1 is defined as 'Minimum Capital Requirement,' Pillar 2 'Supervisory Review Process,' and Pillar 3 'Market Discipline.' Pillar 3 aims to promote market discipline through regulatory disclosure requirements. These requirements enable market participants to access key information relating to a bank's regulatory capital and risk exposures in order to increase transparency and confidence about a bank's exposure to risk and overall adequacy of its regulatory capital.

The information contained in these disclosures are in line with the disclosure requirements as laid down in Part Eight of the CRR, including recent amendments, for the purpose of explaining the basis on which BofA Europe has prepared and disclosed certain information about the application of regulatory capital adequacy rules and concepts. It therefore does not constitute any form of financial statement on BofA Europe, or of the wider Enterprise, and as such, is not prepared in accordance with International Financial

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Reporting Standards ("IFRS") or International Accounting Standards ("IAS"). Therefore the information contained in these Pillar 3 disclosures may not be directly comparable with the Annual Report and Financial Statements, and the disclosure is not required to be audited by external auditors.

In addition, the report does not constitute any form of forward looking record or opinion on BofA Europe. Although the Pillar 3 disclosure is intended to provide transparent information on a common basis, the information contained in this document may not be directly comparable with the information provided by other banks. Any financial information included herein is unaudited.

BofA Europe's financial statements have been prepared in accordance with the Companies Act 2014, Financial Reporting Standard 100 ("FRS 100") - Application of Financial Reporting Requirements and Financial Reporting Standard 101 ("FRS 101") - Reduced Disclosure Framework. In accordance with these it applies the recognition, measurement and disclosure requirements of International Financial Reporting Standards that have been adopted in the EU ("EU-adopted IFRS").

This Pillar 3 disclosure is published on BAC's corporate website: <http://investor.bankofamerica.com>.

## **Transitional Impact of IFRS 9**

BofA Europe adopted IFRS 9 for the accounting of financial instruments on 1 January 2018. The introduction of the expected credit loss ("ECL") model did not result in a material adjustment to equity as at the date of adoption of IFRS 9. For this reason, BofA Europe is not applying the transitional arrangements for IFRS 9 as specified in Article 473a of the CRR. BofA Europe's own funds, capital and leverage ratios already reflect the full impact of IFRS 9.

## **CRR 'Quick Fix'**

On 26 June 2020, Regulation (EU) 2020/873 (CRR 'quick fix') was published in the Official Journal of the EU, amending Regulations (EU) No 575/2013 and (EU) 2019/876 as regards certain adjustments in response to the novel coronavirus (COVID-19) pandemic. The CRR 'quick fix' is part of a series of measures taken by European institutions to mitigate the impact of the COVID-19 pandemic on institutions across EU Member States. In addition to the flexibility already provided in the existing rules, the CRR 'quick fix' introduces certain adjustments to the CRR, including temporary measures, intended, inter alia, to enhance credit flows to companies and households, thereby supporting the EU's economy.

BofA Europe has chosen not to apply the temporary treatment available in Article 468, or any of the other CRR 'quick fix' articles.

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## 4. Key Metrics

The following table shows a summary of BofA Europe's key capital, leverage and liquidity metrics as at 30 June 2022

Table 1. EU KM1 – Key Metrics Template

<i>(Euros in Millions)</i>		Q2 2022	Q4 2021	Q2 2021
	<b>Available own funds (amounts)</b>			
1	Common Equity Tier 1 (CET1) capital	11,840	10,976	9,944
2	Tier 1 capital	11,840	10,976	9,944
3	Total capital	13,766	12,742	11,627
	<b>Risk-weighted exposure amounts</b>			
4	Total risk-weighted exposure amount	54,414	46,681	44,691
	<b>Capital ratios (as a percentage of risk-weighted exposure amount)</b>			
5	Common Equity Tier 1 ratio (%)	21.76%	23.51%	22.25%
6	Tier 1 ratio (%)	21.76%	23.51%	22.25%
7	Total capital ratio (%)	25.30%	27.30%	26.02%
	<b>Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)</b>			
EU 7a	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	2.20%	2.30%	2.30%
EU 7b	of which: to be made up of CET1 capital (percentage points)	1.24%	1.29%	1.29%
EU 7c	of which: to be made up of Tier 1 capital (percentage points)	1.65%	1.73%	1.73%
EU 7d	Total SREP own funds requirements (%)	10.20%	10.30%	10.30%
	<b>Combined buffer requirement (as a percentage of risk-weighted exposure amount)</b>			
8	Capital conservation buffer (%)	2.50%	2.50%	2.50%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	-%	-%	-%
9	Institution specific countercyclical capital buffer (%)	0.06%	0.05%	0.05%
EU 9a	Systemic risk buffer (%)	-%	-%	-%
10	Global Systemically Important Institution buffer (%)	-%	-%	-%
EU 10a	Other Systemically Important Institution buffer	0.75%	0.75%	0.50%
11	Combined buffer requirement (%)	3.31%	3.30%	3.05%
EU 11a	Overall capital requirements (%)	13.51%	13.60%	13.35%
12	CET1 available after meeting the total SREP own funds requirements (%)	7,677	7,370	6,492
	<b>Leverage ratio</b>			
13	Total exposure measure	95,784	78,648	83,932
14	Leverage ratio (%)	12.36%	13.96%	11.85%
	<b>Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)</b>			
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)	-%	-%	-%
EU 14b	of which: to be made up of CET1 capital (percentage points)	-%	-%	-%
EU 14c	Total SREP leverage ratio requirements (%)	3.00%	3.00%	3.00%
	<b>Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)</b>			
EU 14d	Leverage ratio buffer requirement (%)	-%	-%	-%
EU 14e	Overall leverage ratio requirements (%)	3.00%	3.00%	3.00%
	<b>Liquidity Coverage Ratio</b>			
15	Total high-quality liquid assets (HQLA) (Weighted value - average)	24,809	24,603	21,435
EU 16a	Cash outflows - Total weighted value	23,109	21,608	18,572
EU 16b	Cash inflows - Total weighted value	6,564	5,721	4,977
16	Total net cash outflows (adjusted value)	16,546	15,887	13,595
17	Liquidity coverage ratio (%)	150.19%	154.96%	158.00%
	<b>Net Stable Funding Ratio</b>			
18	Total available stable funding	52,714	41,881	45,097
19	Total required stable funding	33,317	26,412	25,289
20	NSFR ratio (%)	158.22%	158.57%	178.33%

## 5. Minimum Requirements for Own funds and Eligible Liabilities (MREL)

As part of amendments to the CRR which were published in the official Journal of the EU as Regulation (EU) 2019/876, the international standard to meet a minimum amount of Total Loss absorbing Capacity ("TLAC") became effective for certain types of Investment Firms and Credit Institutions in June 2019. In the CRR, this is referred to as Minimum Requirements for Own Funds and Eligible Liabilities ("MREL"). Firms that are material subsidiaries of non EU Global Systematically Important Institutions ("G-SIIs") per CRR definition are required to hold a minimum amount of MREL. BAC is a non-EU G-SII and as at 30 June 2022 BofA Europe did not meet the definition of a material subsidiary, as per Art 4(135) of CRR.

BofA Europe does meet the definition of a Relevant Legal Entity as set out in the Single Resolution Board's ("SRB") MREL Policy published in May 2021. Furthermore, for BofA Europe, the institution specific internal MREL requirement has been set by the SRB and provisions applicable from 1 January 2022 continue to be met.

MREL resources are comprised of qualifying own funds and eligible liabilities. In order for liabilities that are not capital resources to qualify as eligible they must meet certain criteria, such as having remaining maturity of at least one year and being subordinated to other operating liabilities.

Table 2 – Key Metrics – MREL Requirements

(Euros in Millions)

	Q2 2022	Q4 2021
Total MREL Resources Available	15,691	14,508
Total RWA	54,414	46,681
MREL as a percentage of RWA	28.84%	31.08%
Leverage Ratio Exposure Measure	95,784	78,647
MREL as a percentage of Leverage Ratio Exposure Measure	16.38%	18.45%
Excluded Liabilities	57,967	43,877

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Table 3 discloses the eligible liabilities, the total risk exposure amount and the total exposure amount, the ratio of own funds and eligible liabilities and the requirements.

Table 3.1 – EU ILAC Internal Loss Absorbing Capacity: Internal MREL and, where applicable, Requirement for Own Funds and Eligible Liabilities for Non-EU G-SIIs

(€ in Millions)	Q2 2022	Minimum Requirement for Own Funds and Eligible Liabilities (Internal MREL)	Non-EU G-SII Requirements for Own Funds and Eligible Liabilities (Internal TLAC)	Qualitative Information
<b>Applicable requirement and level of application</b>				
EU-1	Is the entity subject to a Non-EU G-SII Requirement for own funds and eligible liabilities? (Y/N)			N
EU-2	If EU 1 is answered by 'Yes', is the requirement applicable on a consolidated or individual basis? (C/I)			
EU-2a	Is the entity subject to an internal MREL requirement? (Y/N)			N
EU-2b	If EU 2a is answered by 'Yes', is the requirement applicable on a consolidated or individual basis? (C/I)			
<b>Own funds and eligible liabilities</b>				
EU-3	Common Equity Tier 1 capital (CET1)	11,840		
EU-4	Eligible Additional Tier 1 instruments	-		
EU-5	Eligible Tier 2 instruments	1,925		
EU-6	Eligible own funds	13,766		
EU-7	Eligible liabilities	1,925		
EU-8	Of which permitted guarantees	-		
EU-9a	(Adjustments)	-		
EU-9b	Own funds and eligible liabilities items after adjustments	15,691		
<b>Total risk exposure amount and total exposure measure</b>				
EU-10	Total risk exposure amount	54,414		
EU-11	Total exposure measure	95,784		
<b>Ratio of own funds and eligible liabilities</b>				
EU-12	Own funds and eligible liabilities (as a percentage of TREA)	28.84 %		
EU-13	of which permitted guarantees	- %		
EU-14	Own funds and eligible liabilities (as a percentage of leverage exposure)	16.38 %		
EU-15	of which permitted guarantees	- %		
EU-16	CET1 (as a percentage of TREA) available after meeting the entity's requirements	0.76 %		
EU-17	Institution-specific combined buffer requirement			
<b>Requirements</b>				
EU-18	Requirement expressed as a percentage of the total risk exposure amount	21.00 %		
EU-19	of which may be met with guarantees	- %		
EU-20	Internal MREL expressed as percentage of the total exposure measure	5.88 %		
EU-21	of which may be met with guarantees	- %		
<b>Memorandum items</b>				
EU-22	Total amount of excluded liabilities referred to in Article 72a(2) CRR			



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Table 3.2 – Prior EU ILAC Internal Loss Absorbing Capacity: Internal MREL and, where applicable, Requirement for Own Funds and Eligible Liabilities for Non-EU G-SIIs

(€ in Millions)	Q4 2021	Minimum Requirement for Own Funds and Eligible Liabilities (Internal MREL)	Non-EU G-SII Requirements for Own Funds and Eligible Liabilities (Internal TLAC)	Qualitative Information
<b>Applicable requirement and level of application</b>				
EU-1	Is the entity subject to a Non-EU G-SII Requirement for own funds and eligible liabilities? (Y/N)			N
EU-2	If EU 1 is answered by 'Yes', is the requirement applicable on a consolidated or individual basis? (C/I)			
EU-2a	Is the entity subject to an internal MREL requirement? (Y/N)			N
EU-2b	If EU 2a is answered by 'Yes', is the requirement applicable on a consolidated or individual basis? (C/I)			
<b>Own funds and eligible liabilities</b>				
EU-3	Common Equity Tier 1 capital (CET1)	10,976		
EU-4	Eligible Additional Tier 1 instruments	-		
EU-5	Eligible Tier 2 instruments	1,766		
EU-6	Eligible own funds	12,742		
EU-7	Eligible liabilities	1,766		
EU-8	Of which permitted guarantees	-		
EU-9a	(Adjustments)	-		
EU-9b	Own funds and eligible liabilities items after adjustments	14,508		
<b>Total risk exposure amount and total exposure measure</b>				
EU-10	Total risk exposure amount	46,681		
EU-11	Total exposure measure	78,648		
<b>Ratio of own funds and eligible liabilities</b>				
EU-12	Own funds and eligible liabilities (as a percentage of TREA)	31.08 %		
EU-13	of which permitted guarantees	- %		
EU-14	Own funds and eligible liabilities (as a percentage of leverage exposure)	18.45 %		
EU-15	of which permitted guarantees	- %		
EU-16	CET1 (as a percentage of TREA) available after meeting the entity's requirements	1.44 %		
EU-17	Institution-specific combined buffer requirement			
<b>Requirements</b>				
EU-18	Requirement expressed as a percentage of the total risk exposure amount	21.00 %		
EU-19	of which may be met with guarantees	- %		
EU-20	Internal MREL expressed as percentage of the total exposure measure	5.88 %		
EU-21	of which may be met with guarantees	- %		
<b>Memorandum items</b>				
EU-22	Total amount of excluded liabilities referred to in Article 72a(2) CRR			

CET1 as a percentage of TREA available after meeting the entity's requirements was restated for prior period.



## 6. Additional details relating to COVID-19

On 2<sup>nd</sup> April 2020, the EBA issued its Guideline on legislative and non-legislative moratoria on loan repayment applied in light of the COVID-19 crisis. Member States have introduced legislative moratoria on loan repayments and various forms of public guarantees to be applied to new lending, amongst other measures.

Information on loans and advances subject to legislative and non-legislative moratoria template, Breakdown of loans and advances subject to legislative and non-legislative moratoria by residual maturity of moratoria template and Information on newly originated loans and advances provided under newly applicable public guarantee schemes introduced in response to COVID-19 crisis template are included in EBA /GL/2020/07 publication. Member States have introduced legislative moratoria on loan repayments and various forms of public guarantees to be applied to new lending, amongst other measures. These measures do not automatically trigger forbearance classification or do not automatically lead to the classification of default.

# Bank of America Europe Designated Activity Company Pillar 3 Disclosure for the Half Year Ended 30 June 2022

Table 4.1 – Information on Loans and Advances Subject to Legislative and Non-Legislative Moratoria

	Gross carrying amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk						Gross carrying amount	
	Performing			Non performing			Performing			Non performing			Inflows to non-performing exposures	
	Of which: exposures with forbearance measures	Of which: Instruments with significant increase in credit risk since initial recognition but not credit-impaired (Stage 2)		Of which: exposures with forbearance measures	Of which: Unlikely to pay that are not past-due or past-due <= 90 days		Of which: exposures with forbearance measures	Of which: Instruments with significant increase in credit risk since initial recognition but not credit-impaired (Stage 2)		Of which: exposures with forbearance measures	Of which: Unlikely to pay that are not past-due or past-due <= 90 days			
(€ in Millions) Q2 2022														
Loans and advances subject to moratorium	-	-	-	-	-	-	-	-	-	-	-	-	-	-
of which: Households	-	-	-	-	-	-	-	-	-	-	-	-	-	-
of which: Collateralised by residential immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	-
of which: Non-financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-
of which: Small and Medium-sized Enterprises	-	-	-	-	-	-	-	-	-	-	-	-	-	-
of which: Collateralised by commercial immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	-

# Bank of America Europe Designated Activity Company Pillar 3 Disclosure for the Half Year Ended 30 June 2022

Table 4.2 – Prior Information on Loans and Advances Subject to Legislative and Non-Legislative Moratoria

	Gross carrying amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk						Gross carrying amount	
	Performing			Non performing			Performing			Non performing			Inflows to non-performing exposures	
	Of which: exposures with forbearance measures	Of which: Instruments with significant increase in credit risk since initial recognition but not credit-impaired (Stage 2)		Of which: exposures with forbearance measures	Of which: Unlikely to pay that are not past-due or past-due <= 90 days		Of which: exposures with forbearance measures	Of which: Instruments with significant increase in credit risk since initial recognition but not credit-impaired (Stage 2)		Of which: exposures with forbearance measures	Of which: Unlikely to pay that are not past-due or past-due <= 90 days			
(€ in Millions) Q4 2021														
Loans and advances subject to moratorium	-	-	-	-	-	-	-	-	-	-	-	-	-	-
of which: Households	-	-	-	-	-	-	-	-	-	-	-	-	-	-
of which: Collateralised by residential immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	-
of which: Non-financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-
of which: Small and Medium-sized Enterprises	-	-	-	-	-	-	-	-	-	-	-	-	-	-
of which: Collateralised by commercial immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	-

# Bank of America Europe Designated Activity Company Pillar 3 Disclosure for the Half Year Ended 30 June 2022

Table 5.1 – Breakdown of Volume of Loans and Advances Subject to Legislative and Non-Legislative Moratoria by Residual Maturity of Moratoria

	Number of obligors	Gross carrying amount							
			Of which: Legislative Moratoria	Of which: Expired	Residual Maturity of Moratoria				
					<= 3 months	> 3 months <= 6 months	> 6 months <= 9 months	> 9 months <= 12 months	> 1 year
<i>(€ in Millions) Q2 2022</i>									
Loans and advances for which moratorium was offered	-	-	-	-	-	-	-	-	-
Loans and advances subject to moratorium (granted)	-	-	-	-	-	-	-	-	-
<i>of which: Households</i>	-	-	-	-	-	-	-	-	-
<i>of which: Collateralised by residential immovable property</i>	-	-	-	-	-	-	-	-	-
<i>of which: Non-financial corporations</i>	-	-	-	-	-	-	-	-	-
<i>of which: Small and Medium-sized Enterprises</i>	-	-	-	-	-	-	-	-	-
<i>of which: Collateralised by commercial immovable property</i>	-	-	-	-	-	-	-	-	-



# Bank of America Europe Designated Activity Company Pillar 3 Disclosure for the Half Year Ended 30 June 2022

Table 5.2 – Prior Breakdown of Volume of Loans and Advances Subject to Legislative and Non-Legislative Moratoria by Residual Maturity of Moratoria

	Number of obligors	Gross carrying amount							
			Of which: Legislative Moratoria	Of which: Expired	Residual Maturity of Moratoria				
					<= 3 months	> 3 months <= 6 months	> 6 months <= 9 months	> 9 months <= 12 months	> 1 year
<i>(€ in Millions) Q4 2021</i>									
Loans and advances for which moratorium was offered	-	-							
Loans and advances subject to moratorium (granted)	-	-	-	-	-	-	-	-	-
<i>of which: Households</i>		-	-	-	-	-	-	-	-
<i>of which: Collateralised by residential immovable property</i>		-	-	-	-	-	-	-	-
<i>of which: Non-financial corporations</i>		-	-	-	-	-	-	-	-
<i>of which: Small and Medium-sized Enterprises</i>		-	-	-	-	-	-	-	-
<i>of which: Collateralised by commercial immovable property</i>		-	-	-	-	-	-	-	-

# Bank of America Europe Designated Activity Company Pillar 3 Disclosure for the Half Year Ended 30 June 2022

Table 6.1 – Information on Newly Originated Loans and Advances Provided under Newly Applicable Public Guarantee Schemes Introduced in Response to COVID-19 Crisis

	Gross carrying amount		Maximum amount of the guarantee that can be considered	Gross carrying amount
		of which: forborne	Public guarantees received	Inflows to non-performing exposures
<i>(€ in Millions) Q2 2022</i>				
Newly originated loans and advances subject to public guarantee schemes	71	35	59	0.20
of which: Households	-	-	-	-
<i>of which: Collateralised by residential immovable property</i>	-	-	-	-
of which: Non-financial corporations	36	-	29	0.20
<i>of which: Small and Medium-sized Enterprises</i>	-	-	-	-
<i>of which: Collateralised by commercial immovable property</i>	-	-	-	-

Table 6.2 – Prior Information on Newly Originated Loans and Advances Provided under Newly Applicable Public Guarantee Schemes Introduced in Response to COVID-19 Crisis

	Gross carrying amount		Maximum amount of the guarantee that can be considered	Gross carrying amount
		of which: forborne	Public guarantees received	Inflows to non-performing exposures
<i>(€ in Millions) Q4 2021</i>				
Newly originated loans and advances subject to public guarantee schemes	74	8	62	0.32
of which: Households	-	-	-	-
<i>of which: Collateralised by residential immovable property</i>	-	-	-	-
of which: Non-financial corporations	36	-	29	0.22
<i>of which: Small and Medium-sized Enterprises</i>	-	-	-	-
<i>of which: Collateralised by commercial immovable property</i>	-	-	-	-

As at 30 June 2022, BofA Europe does not have any loans and advances subject to legislative and non-legislative moratoria as shown in the nil disclosure in Tables 4.1 and 5.1.

BofA Europe has €71M of newly originated loans and advances under applicable public guarantee schemes which are presented under Table 6.1.



## CFO Attestation

Bank of America Europe Designated Activity Company Pillar 3 Disclosures Senior Management Attestation

“I attest that the disclosures provided in the BofA Europe Q2 2022 Pillar 3 disclosure have been prepared in accordance with the internal control processes detailed in the BofA Europe Pillar 3 Disclosure Policy, which has been approved at the management body level as amended for non-material changes.”

The BofA Europe Pillar 3 Disclosures have been attested by:

BofA Europe Chief Financial Officer and Member of the Board:

Jonathan Lee