

## Drug-free workplace and alcohol policy

Bank of America aims to create a workplace free from the dangers and resulting consequences of illegal and illicit drug use and alcohol abuse. The Drug-Free Workplace and Alcohol Policy (“Policy”) establishes requirements to prevent the presence or use of illegal or illicit drugs or unauthorized alcohol on Bank of America premises and to provide a safe work environment.

### Basic Policy

Bank of America strives to provide a safe, productive workplace for its employees and customers, free of behaviors and problems associated with the use and abuse of illegal or illicit drugs and unauthorized use and possession of alcohol. Substance abuse subjects Bank of America to unacceptable risks of workplace accidents, errors or other failures that would undermine the company’s ability to operate effectively and efficiently.

For purposes of this Policy, the term “illegal drug,” as defined by applicable laws, includes any substance that is prohibited by either federal, state or local law where the employee works and/or resides or any other applicable law or any substance that may be legally available, but has been illegally obtained or any substance that is being used in a manner or for a purpose other than as prescribed. Drugs that are legal in states where the employee works and/or resides, but are still illegal under federal or other state laws, such as marijuana, are considered to be an “illicit drug” for purposes of this policy.

Bank of America strictly prohibits the use or possession of illegal and illicit drugs, including the sale, purchase, transfer, transport, manufacture, distribution or dispensation by anyone on work time, on company premises, at work sites where employees may be assigned, while conducting company business or in a company vehicle. Violation of this Policy is grounds for disciplinary action up to and including termination or, in the case of job applicants, ineligibility for hire.

The company does not allow unauthorized use or possession of alcoholic beverages on company premises or at company-sponsored events off company premises. Use or possession of alcoholic beverages on company premises may be approved by the appropriate level manager only for entertainment of clients or special business-related events. However, even when the consumption of alcohol is approved, employees must still behave in a professional manner and maintain conduct appropriate for the workplace or offsite event location. Violation of this Policy is grounds for disciplinary action up to and including termination or, in the case of job applicants, ineligibility for hire.