

# BofA Securities Europe Société Anonyme

## Pillar 3 Remuneration Disclosure

Performance Year Ended 31 December 2024

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## Introduction

The following remuneration disclosure sets forth a summary of the remuneration principles and programmes executed by BofA Securities Europe Société Anonyme (“BofASE”) as at 31 December 2024. Additionally, the disclosure sets forth information regarding the remuneration of staff identified as Material Risk Takers (“MRTs”) for BofASE, taking into account the qualitative and quantitative criteria to identify categories of staff whose professional activities may have a material impact on a firm’s risk profile contained in article L. 511-71 of the French *Code Monétaire et Financier* implementing the Capital Requirement Directive 2013/36/EU as amended by Directive 2019/878/EU (“CRD V”) and Commission Delegated Regulation (EU) No 2021/923 (the “RTS”).

This document therefore incorporates the qualitative disclosure requirements under Article 450(1) and 450(2) of the Capital Requirements Regulation (Regulation (EU) No 575/2013 as amended, including by Directive 2019/876/EU (“CRR II”), and the quantitative disclosure requirements under paragraphs (g) to (i) of Article 450(1) of the CRR II, as well as corresponding guidance as set out in the 2021 European Banking Authority Guidelines on Sound Remuneration Policies (the “EBA Guidelines”) as applicable.

BofASE is a wholly owned indirect subsidiary of Bank of America Corporation (the “Company” or “Bank of America”), a corporation organised and existing under the laws of the United States of America. BofASE therefore falls within Bank of America Corporation’s global remuneration governance framework and global remuneration policies, in addition to operating a local remuneration governance framework and the BofASE Remuneration Policy Statement (the “RPS”).

## I. REMA – Remuneration Policy

### Governance and the Decision-making Process for Determining the Remuneration Policy

As a U.S.-based firm, Bank of America’s primary regulator is the U.S. Board of Governors of the Federal Reserve System (the “Federal Reserve”). The Company’s remuneration programmes and practices are consistent with the Federal Reserve’s requirements, in addition to those of other regulators globally, including the Autorité de Contrôle Prudentiel et de Résolution (the “ACPR”) and the European Central Bank (the “ECB”). Additionally, shares of the Company’s common stock are traded on the New York Stock Exchange (the “NYSE”) and, as such, the Company is subject to requirements imposed by the NYSE, including those specified in the NYSE Listed Company Manual. The NYSE Listed Company Manual provides that the Company’s Board of Directors Compensation and Human Capital Committee (“CHCC”) is responsible for recommending to the Company’s Board of Directors the approval of incentive and equity-based compensation plans that are subject to the Company’s Board approval.

The Company therefore designs and governs its remuneration programmes on a global basis so that its programmes are consistent with the Company’s Global Compensation Principles as described in the Company’s Compensation Governance Policy (“CGP”) and sound risk management practices as well as compliant with applicable laws and regulations. The CHCC has adopted and annually reviews the CGP (most recently in June 2024) to govern incentive remuneration decisions and define the framework for design oversight of incentive remuneration programmes across the Company, including BofASE. The CGP is designed to be consistent with global regulatory initiatives so that the Company’s incentive remuneration plans do not encourage excessive risk-taking.

Bank of America's remuneration policies and processes, including those in operation within BofASE, are gender-neutral, complement Responsible Growth, and assist the Company and BofASE in achieving its strategic objectives, creating long-term value, maintaining our culture of compliance and contributing to our environmental, social and governance activities.

In order to provide an appropriate balance of risk and reward, incentive remuneration plans are developed in accordance with the Company's Global Compensation Principles, which are applicable to all entities including BofASE:

Principle 1. Compensation should be comprised of an appropriate mix of salary, benefits and incentives paid over time that properly aligns employee and stockholder interests.

Principle 2. Criteria for payment of incentive compensation should take into account Company-wide, business unit and individual factors.

Principle 3. Compensation should be determined on the basis of a combination of financial and non-financial factors that reflect both the current period and a longer period.

Principle 4. Compensation programmes should incorporate appropriate governance processes and procedures.

Bank of America applies prudent risk management practices to its incentive remuneration programmes across the enterprise, and is committed to a remuneration governance structure that effectively contributes to the Company's overall risk management policies. BofASE is part of Bank of America's remuneration governance process and the following bodies are responsible for the governance of BofASE's remuneration plans:

- The BofASE Management Team and the BofASE Chief Executive Officer (the "BofASE CEO"),
- the BofASE Remuneration Committee (the "Committee") and the BofASE Board of Directors,
- line of business management and independent control functions aligned to the line of business,
- the Management Compensation Committee (the "MCC"),
- the CHCC, which is wholly made up of independent directors and functions as the Company's global Remuneration Committee, and
- the Company's Board of Directors.

The intention of the above governance process is to drive debate, encourage consistency and calibrate across lines of business, countries and legal entities. This allows for a greater focus on the correlation and consistency of remuneration recommendations at a global and local level, and ensures that Responsible Growth, including conduct, are considered throughout the remuneration process.

BofASE effectively governs and aligns remuneration with prudent risk taking, considering the business strategy, objectives, values and long term interests of BofASE, and provides an appropriate local level of responsibility for the preparation and review of decisions regarding remuneration. The Committee is responsible for local remuneration governance, as necessary, to address local issues.

The role of the Committee, in accordance with Paragraphs 57 and 58 of the EBA Guidelines and article L. 511-102 of the French *Code Monétaire et Financier*, is to assist the BofASE Board of Directors in fulfilling its oversight responsibility relating to matters of corporate governance and implementation of the

remuneration policies and practices, as reflected in the BofASE RPS, in particular the policies and practices which have an impact on the risk profile and risk management of BofASE. The Committee is responsible for the governance and oversight of remuneration decisions for BofASE employees in accordance with the Committee Charter. The Committee collaborates with other committees of the BofASE Board of Directors, as well as the CHCC.

The Committee is charged with oversight of the development and implementation of BofASE's remuneration policies and practices. The RPS sets forth the overall approach to the execution of BofASE's remuneration philosophy and the operation of its remuneration programmes, including BofASE's approach to complying with the remuneration requirements applicable to BofASE. In accordance with CRD V, the RPS may be updated periodically and as required to reflect changes with BofASE's remuneration processes and practices and/or changes with remuneration regulation. The Committee reviews the RPS annually or more frequently as necessary (most recently in September 2024), and recommends it to the BofASE Board of Directors for approval.

BofASE benefits from being part of the Company's global remuneration governance framework by aligning its RPS with the CGP, which provides dual oversight of remuneration processes and practices within BofASE. The Committee has a direct connection and open flow of communication with the CHCC, allowing any escalation of concerns and changes required relating to the operation of the Company's remuneration system for BofASE.

During performance year 2024, the Committee held five (5) meetings. Discussions covered a number of topics, including how BofASE complies with applicable rules and aligns remuneration to the Company's commitment to Responsible Growth and environmental, social and governance considerations through its remuneration policies and practices.

It is critical to the effective implementation of the CGP and RPS that the independent control functions operate independently from the lines of business they support. To this end, independent control functions operate as separate functional lines, and therefore the remuneration of independent control function employees (including salary levels and incentive awards) is independently determined and is not based on the financial performance of the individual lines of business they support.

As part of its governance routine, the CHCC meets with the heads of the Company's independent control functions (including the Chief Risk Officer ("CRO")) and lines of business to discuss their feedback on the pay-for-performance process, including their experience managing risk and conduct matters. In addition, the Company's CRO also certifies all incentive plans across the Company as part of the MCC's governance process. The Committee considers risk and conduct matters as relevant and appropriate through the performance year and interacts with the BofASE CRO, the BofASE CEO and other local Board committees, including the BofASE Board Risk Committee, regarding the operation of the Company's remuneration system as applicable to BofASE. In line with CRD V, as notably implemented in article L. 511-74 of the French *Code Monétaire et Financier*, the Company's Corporate Audit performs an annual review of BofASE's remuneration processes. The scope of each annual audit is determined by applicable regulatory requirements for audit coverage as well as assessment of potential areas of key risk within the remuneration processes. The BofASE Head of Corporate Audit annually updates the Committee on the results of the review.

As a result of these processes and reviews, and in combination with the risk management and malus and clawback features of the Company's remuneration programmes, BofASE believes that its remuneration policies and practices appropriately balance risk and reward in a way that does not encourage excessive or imprudent risk-taking or create risks that are reasonably likely to have a material adverse effect on BofASE or the Company. Moreover, oversight by the CHCC, MCC, the Committee, independent control functions, and line of business management helps the Company maintain a remuneration programme that is intended to mitigate the potential for conflicts of interest.

The Committee has the authority to obtain, at its discretion, advice and assistance from internal or external advisors as appropriate and/or necessary. The CHCC's independent remuneration consultant, Semler Brossy Consulting Group LLC, meets regularly with the CHCC outside the presence of management and alone with the CHCC Chair, and also reviews management's incentive plan certifications with the CHCC.

### **The Link between Pay and Performance**

The cornerstone of Bank of America's remuneration philosophy across all lines of business is to pay for performance ("P4P") – Bank of America, BofASE, line of business and individual performance. BofASE does not remunerate or assess employees' performance in a way that encourages employees to act in a manner that is contrary to our risk management strategy and/or creates conflicts of interest.

Through the Company's Performance Management process, employees understand performance expectations for their role through ongoing dialogue with their manager. The Performance Management process is designed and monitored by the Global Talent function in Human Resources. This process is reviewed periodically so that it meets the needs of managers to assess and communicate performance expectations. Throughout the year, employees receive coaching on their performance and ultimately receive a rating for their full year of performance based upon their achievement of goals for their job.

Each employee's performance is assessed on quantitative and qualitative objectives as well as specific behaviours, and performance is factored into each employee's incentive remuneration award. Depending on the employee, performance objectives may be focused on the following:

- Quantitative performance objectives may be focused on a combination of BofASE, Bank of America, line of business, and individual results, and based on factors such as business performance, profit/loss, new client relationships, and operational excellence.
- Qualitative performance objectives may include quality and sustainability of earnings, successful implementation of strategic initiatives, broader contribution to Bank of America and/or BofASE, contribution to Responsible Growth, leadership, teamwork, adherence to the Code of Conduct and other core values of Bank of America and BofASE.

In addition to the above, all employees receive Risk Management performance objectives, such as adoption of risk culture and managing risk, in alignment with the Risk Framework and BofASE's Risk Appetite Statement. To support Responsible Growth, all employees receive a Great Place to Work performance objective.

Managers receive additional performance objectives, such as management effectiveness, data ownership, business results or culture / leadership objectives.

Employees receive two ratings – a Result rating, which measures what the employee achieves, and a Behaviour rating, which measures the behaviours demonstrated to achieve results. The scale for both ratings is Exceeds Expectations, Meets Expectations, and Does Not Meet Expectations. Both the Result and Behaviour ratings are used in determining employees' remuneration.

As a result, an employee's remuneration can be influenced both by what the employee achieves and how the employee achieves it. Where performance is not sufficiently strong, the employee may receive no variable.

### **Risk Management and Incentive Plans**

Risk is inherent in every material business activity that the Company and BofASE undertake. BofASE's business exposes it to strategic, credit, market, liquidity, compliance, operational and reputational risks, which incorporate climate and environmental-related risks, social, and governance considerations.

BofASE must manage these risks to maximize its long-term results by ensuring the integrity of its assets and the quality of its earnings. To support Responsible Growth and BofASE's corporate goals and objectives, risk appetite, and business and risk strategies, BofASE maintains a governance structure that delineates the responsibilities for risk management activities, as well as governance and oversight of those activities, by management and the BofASE Board of Directors.

The BofASE Board of Directors has adopted the Company's Risk Framework which defines the accountability of the Company, its subsidiaries and its employees in managing risk, as well as the BofASE Risk Appetite Statement. BofASE's Risk Appetite Statement defines the parameters under which it will take risk. Bank of America has also established the Environmental and Social Risk Policy Framework and the Climate Risk Framework which are aligned to the Company's Risk Framework and provide clarity and transparency around how the Company approaches climate-related and environmental risks as well as social considerations.

Management monitors, and the BofASE Board oversees (directly and through its committees, including the Committee as applicable), BofASE's financial performance, execution against the strategic and financial operating plans, compliance with the risk appetite metrics and the adequacy of internal controls.

The Company continually evaluates the design of its remuneration programmes in accordance with the Risk Framework. The CHCC and the Committee are committed to a remuneration governance structure that effectively contributes to the Company's broader risk management policies, including those applicable to BofASE.

The Company's incentive plans, as applicable to BofASE, are designed to compensate employees based on their performance ratings for results against their individual performance plan and behaviours, as well as overall Company and line of business performance.

Annual budgets for incentive pools are established as part of the overall financial planning process so that planned incentives align to the overall anticipated performance and risk appetite of the Company and BofASE. Incentive pools are based on a combination of financial, risk and non-financial measures and performance. The determination of incentive pools is also subject to management discretion, taking into account overall performance, inclusive of risk, of the Company, BofASE, and/or specific lines of business and other factors including the achievement of strategic objectives and a qualitative assessment of the

quality and sustainability of earnings over time. Incentive pools may be adjusted to reflect long-term risk arising through line of business and sub-line of business performance.

When determining variable remuneration, BofASE considers the impact of variable remuneration on the maintenance of a sound capital base together with the impact on liquidity and, where appropriate, the likelihood and timing of earnings. BofASE complies with local regulatory requirements to monitor and maintain sufficient capital and liquidity ratios and continues to monitor the regulatory requirements in this area. The BofASE capital planning process is designed to assess BofASE's risk profile with regard to legal, regulatory and internal requirements. The approach also applies an appropriate stress test to assess the impact on internal capital demand and supply and liquidity.

Ex ante risk is taken into account through the determination of incentive pools, which takes into account current and future performance and risk factors, including current and future economic context. Bank of America and BofASE continue to ensure that incentive pools and individual outcomes are aligned to performance, risk, conduct and the Company's culture.

Ex post risk is taken into account and managed in connection with incentive remuneration programmes through arrangements permitting performance adjustment of deferred variable remuneration. Employees in positions where the greatest risk is being taken are generally subject to higher levels of deferral and potential performance adjustments.

### **Employee Pay**

BofASE compensates its employees using a balanced mix of fixed remuneration, annual cash incentives and deferred incentives that are risk-adjusted, pay over time, and align employee and stockholder interests. Incentives are delivered in equity, equity-based instruments or cash. In general, the higher an employee's management level or amount of incentive compensation award, the greater the proportion of incentive compensation should be (i) subject to deferral and (ii) delivered in the form of equity-based compensation.

Fixed remuneration mainly consists of base salary, benefits and, for certain employees, fixed role-based allowances. Base salary and fixed role-based allowance levels reflect each employee's scope of responsibility, experience, market pressures and accountability within the Company and are intended to be part of a competitive total remuneration package. Benefits, including non-discretionary pension, align to local market practice and legal requirements.

The portion of employees' remuneration that is variable, i.e., annual cash incentives and deferred incentives, as a percentage of total remuneration, generally increases for more senior positions. The remuneration mix is reviewed annually so that BofASE operates a balanced and market-competitive programme whilst in compliance with local and European regulations. Additionally, Bank of America and BofASE continually evaluate and enhance their compensation, benefits and resource offerings to employees and their families.

Equity-based awards are the simplest, most direct way to align employee interests with those of stockholders. This serves two key objectives, which are to focus employees on long-term sustainable results and to subject remuneration awards to risk over an appropriate time horizon that can be easily communicated and understood.

For individuals receiving variable compensation above the value of an internally defined threshold, a



portion of incentive awards is provided as a deferred incentive that, for performance year 2024, generally becomes earned and payable over a period of four years after grant, increasing to longer periods for certain MRTs to reflect local regulatory requirements as described below. Deferred incentives will be cancelled in case of detrimental conduct and, where applicable, may also be cancelled if the Company, line of business or business unit (as applicable) fails to remain profitable during the vesting period.

BofASE offers guaranteed incentive awards only in exceptional circumstances to new hires, limited to the first year of employment. Where required, BofASE may offer and structure retention awards in line with applicable regulatory requirements. Severance payments are structured in line with relevant employment law and regulatory requirements, do not provide for a disproportionate reward, and do not reward failure or misconduct. Additionally, variable pay may be awarded to employees of BofASE as part of special remuneration programmes introduced by Bank of America from time to time. All remuneration programmes are designed to be compliant with relevant remuneration regulation locally and globally.

### **Commitment to Equal Pay for Equal Work and Responsible Growth**

Bank of America's and BofASE's commitment to Responsible Growth starts at the top with the Board, which oversees the Company's culture and holds management accountable in fulfilling the Company's commitment to Responsible Growth, including being a great place to work.

The pay-for-performance approach strives to recognize and reward performance. Robust policies and practices are in place which are designed to achieve compliance with applicable local labour law requirements. Remuneration is regularly benchmarked against other companies as relevant and appropriate.

The Company undertakes annual pay equity analyses including equal pay reviews, minimum wage reviews and gender pay disclosures.

### **Material Risk Taker Pay**

BofASE operates an MRT Identification Framework that is compliant with EU and local regulatory requirements and is overseen by the Committee as appropriate. MRTs are employees whose professional activities have a material impact on the risk profile of BofASE's operations. BofASE applies the qualitative and quantitative criteria outlined in article L. 511-71 of the French *Code Monétaire et Financier* implementing CRD V and the RTS for the identification of MRTs as well as additional criteria identified by BofASE through internal governance routines. BofASE MRTs are determined based on the role and activities of the employee taking into consideration the size, internal organization and nature, scope and complexity of BofASE's activities.

BofASE MRTs are subject to the remuneration requirements provided in the French provisions implementing CRD V, the EBA Guidelines and related guidance as applicable (together the "MRT Remuneration Rules"). In accordance with CRD V and with article L. 511-78 of the French *Code Monétaire et Financier*, BofASE has obtained approvals from relevant shareholders to increase the maximum ratio of variable to fixed compensation to 2:1 for BofASE MRTs. This was passed unanimously by relevant group holding companies in October 2019.

Variable remuneration for BofASE MRTs is structured per the requirements outlined in the MRT Remuneration rules and generally consists of a mixture of upfront (delivered in cash or restricted stock units ("RSUs")) and deferred payments. In accordance with article L. 511-81 of the French *Code Monétaire*

*et Financier*, the equity-based component is a minimum of 50% of variable remuneration, made up of deferred and immediately vested remuneration. Deferred awards are delivered in the form of equity-based awards, typically in the form of RSUs which, for performance year 2024, become earned and payable over a period of four or five years after grant (as appropriate) and will be at least 40% or 60% of the total incentive award, as required under article L. 511-82 of the French Code Monétaire et Financier. Variable remuneration delivered in immediately vested or deferred equity-based awards for BofASE MRTs is subject to an appropriate holding period after vesting, which generally will be one year. Deferred awards do not carry dividends or dividend equivalents during the deferral period, as required under relevant regulations.

BofASE may apply individual proportionality concessions as appropriate under the MRT Remuneration Rules.

Deferred awards will be cancelled in specific circumstances including, but not limited to, cases of detrimental conduct, conduct resulting in significant losses for Bank of America or BofaSE and may also be cancelled if the Company, line of business or business unit (as applicable) fails to remain profitable during the vesting period. If risks taken as part of approved business strategies do not result in sustainable profits, or if the employee fails to behave according to Company standards or fails to meet the criteria set out in articles L. 511-84 and R. 511-24 of the French *Code Monétaire et Financier* implementing CRD V and related guidance, the value of the deferred equity award may be impacted or adjusted downwards, and/or vested amounts may be clawed back. In the case of BofASE MRTs, 100% of total variable remuneration (whether upfront or deferred) is subject to malus and/or clawback arrangements.

By combining deferred awards with appropriate malus and clawback provisions, including the criteria set out in the MRT Remuneration Rules, BofASE considers that it places a strong focus on sustainable long-term results and appropriate behaviours.

The total remuneration composition for performance year 2024 was reviewed by the BofASE CEO and the Committee in January 2025. The recommendations for performance year 2024 incentive awards for BofASE MRTs were reviewed by the Committee and the CHCC in January 2025.

## II. Disclosure Tables

This section contains the aggregated quantitative information required under Article 450 of the CRR II and related guidance as set out in the EBA Guidelines, in relation to performance year 2024, as applicable to MRTs of BofASE.

All remuneration data is shown in EUR 000s using the exchange rate specified by the EU Commission.

### REM1 – Remuneration awarded for the financial year<sup>1 2 3 4</sup>

		MB Supervisory function	MB Management function	Other senior management	Other identified staff
Fixed Remuneration	Number of identified staff <sup>1</sup>	7	2	14	168
	Total fixed remuneration <sup>4</sup>	790	2,290	10,982	65,763
	Of which: cash-based	790	2,234	10,656	61,526
	Of which: shares or equivalent ownership interests	-	-	-	-
	Of which: share-linked instruments or equivalent non-cash instruments	-	-	-	-
	Of which: other instruments	-	-	-	-
	Of which: other forms	-	56	326	4,237
Variable Remuneration	Number of identified staff <sup>1</sup>	7	2	14	168
	Total variable remuneration	-	3,368	9,507	61,136
	Of which: cash-based	-	162	1,148	8,733
	<i>Of which: deferred</i>	-	-	-	-
	Of which: shares or equivalent ownership interests	-	3,044	7,211	45,434
	<i>Of which: deferred</i>	-	3,044	7,211	45,434
	Of which: share-linked instruments or equivalent non-cash instruments	-	162	1,148	6,969
	<i>Of which: deferred</i>	-	-	-	-
	Of which: other instruments	-	-	-	-
	<i>Of which: deferred</i>	-	-	-	-
	Of which: other forms	-	-	-	-
	<i>Of which: deferred</i>	-	-	-	-
Total remuneration		790	5,658	20,489	126,899

## REM2 - Guaranteed variable remuneration and severance payments

	MB Supervisory function	MB Management function	Other senior management	Other identified staff
<b>Guaranteed variable remuneration awards</b>				
Number of identified staff	-	-	-	-
Total amount	-	-	-	-
Of which guaranteed variable remuneration awards paid during the financial year, that are not taken into account in the bonus cap	-	-	-	-
<b>Severance payments awarded in previous periods, that have been paid out during the financial year</b>				
Number of identified staff <sup>1</sup>	-	-	-	-
Total amount	-	-	-	-
<b>Severance payments awarded during the financial year</b>				
Number of identified staff	-	-	-	1
Total amount	-	-	-	561
Of which paid during the financial year	-	-	-	561
Of which deferred	-	-	-	-
Of which severance payments paid during the financial year, that are not taken into account in the bonus cap	-	-	-	561
Of which highest payment that has been awarded to a single person	-	-	-	561

## REM3 - Deferred remuneration<sup>5</sup>

	Total amount of deferred remuneration awarded for previous performance periods	<i>Of which due to vest in the financial year</i>	<i>Of which vesting in subsequent financial years</i>	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the financial year	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in future performance years	Total amount of adjustment during the financial year due to ex post implicit adjustments	Total amount of deferred remuneration awarded before the financial year actually paid out in the financial year	Total of amount of deferred remuneration awarded for previous performance period that has vested but is subject to retention periods
<b>MB Supervisory function</b>	-	-	-	-	-	-	-	-
Cash-based	-	-	-	-	-	-	-	-
Shares or equivalent ownership interests	-	-	-	-	-	-	-	-
Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
Other instruments	-	-	-	-	-	-	-	-
Other forms	-	-	-	-	-	-	-	-
<b>MB Management function</b>	<b>8,588</b>	<b>1,643</b>	<b>6,945</b>	-	-	<b>2,796</b>	<b>1,278</b>	<b>1,287</b>
Cash-based	-	-	-	-	-	-	-	-
Shares or equivalent ownership interests	8,588	1,643	6,945	-	-	2,796	1,278	1,287
Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
Other instruments	-	-	-	-	-	-	-	-
Other forms	-	-	-	-	-	-	-	-
<b>Other senior management</b>	<b>26,866</b>	<b>5,351</b>	<b>21,515</b>	-	-	<b>8,745</b>	<b>4,336</b>	<b>4,335</b>
Cash-based	-	-	-	-	-	-	-	-
Shares or equivalent ownership interests	26,866	5,351	21,515	-	-	8,745	4,336	4,335
Share-linked instruments or equivalent non-cash instruments	-	-	-	-	-	-	-	-
Other instruments	-	-	-	-	-	-	-	-
Other forms	-	-	-	-	-	-	-	-
<b>Other identified staff</b>	<b>108,584</b>	<b>20,364</b>	<b>88,219</b>	-	-	<b>35,156</b>	<b>18,359</b>	<b>12,023</b>
Cash-based	583	140	443	-	-	-	140	-
Shares or equivalent ownership interests	105,128	19,212	85,916	-	-	34,221	17,510	11,454
Share-linked instruments or equivalent non-cash instruments	2,873	1,012	1,860	-	-	935	709	569
Other instruments	-	-	-	-	-	-	-	-
Other forms	-	-	-	-	-	-	-	-
<b>Total amount</b>	<b>144,038</b>	<b>27,358</b>	<b>116,679</b>	-	-	<b>46,697</b>	<b>23,973</b>	<b>17,645</b>

## REM4 – Remuneration of 1 million EUR or more per year

EUR	Identified staff that are high earners as set out in Article 450(i) CRR
1 000 000 to below 1 500 000	22
1 500 000 to below 2 000 000	10
2 000 000 to below 2 500 000	2
2 500 000 to below 3 000 000	3
3 000 000 to below 3 500 000	2
3 500 000 to below 4 000 000	2
4 000 000 to below 4 500 000	-
4 500 000 to below 5 000 000	1
5 000 000 to below 6 000 000	1
6 000 000 to below 7 000 000	1

## REM5 - Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff)<sup>1 2 3 4</sup>

	Management Body			Business areas						Total
	MB Supervisory function	MB Management function	Total MB	Investment banking	Retail banking	Asset management	Corporate functions	Independent internal control functions	All other	
<b>Total number of identified staff<sup>1</sup></b>										<b>191</b>
Of which: members of the MB	7	2	9							
Of which: other senior management				8	-	-	2	4	-	
Of which: other identified staff				86	-	-	58	24	-	
<b>Total remuneration of identified staff</b>	<b>790</b>	<b>5,658</b>	<b>6,448</b>	<b>115,747</b>	-	-	<b>22,035</b>	<b>9,606</b>	-	
Of which: variable remuneration	-	3,368	3,368	60,597	-	-	7,129	2,917	-	
Of which: fixed remuneration <sup>4</sup>	790	2,290	3,080	55,150	-	-	14,906	6,689	-	

### Notes

1. The BofASE MRT population includes staff of BofASE as well as staff of other European entities whose professional activities have been identified as potentially having a material impact on the risk profile of BofASE's operations. BofASE MRTs may also be MRTs of other European entities and could therefore additionally be reflected in relevant regulatory reports for these entities. Year-over-year changes to the BofASE MRT population reflect employee movement and role/responsibility changes. BofASE MRT numbers based on employees active as of 31<sup>st</sup> of December 2024 at Bank of America.
2. Where applicable, for employees who are BofASE MRTs for part of the year, the relevant portions of performance year 2024 remuneration within the scope of this disclosure are shown.
3. This table includes 50 individuals who met the criteria set out in point in Article 94(3)(b) of CRD V in 2024, and to each of whom points (l), (m), and (o) of Article 94(3)(b) of CRD therefore do not apply. The 2024 aggregate total remuneration population for this population was 9.2m EUR, which included 7.7m EUR of fixed remuneration and 1.5m EUR of variable remuneration.
4. Fixed remuneration comprises base salaries, fixed allowances and estimated pensions, benefits and on-going international mobility-related allowances, as relevant. Variable remuneration comprises upfront awards (cash and equity-based awards) and deferred equity-based awards. Remuneration is included on a basis consistent with values used in complying with the maximum permitted ratio of fixed to variable pay where applicable.
5. All amounts of deferred remuneration granted in prior performance years are shown in full for individuals who held a BofASE MRT role during performance year 2024. Deferred remuneration in the form of shares or share-linked instruments is based on a stock price of USD 33.24. Implicit adjustments reflect the difference in value of deferred awards between 1st January 2024 and 31st December 2024. All deferred remuneration is subject to performance adjustment and detrimental conduct provisions.