



Pillar 3 Regulatory Capital Disclosures

Standardized Approach

For the quarter ended March 31, 2015

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Important Presentation Information

These disclosures are required by regulatory capital rules promulgated by the Office of the Comptroller of the Currency, the Board of Governors of the Federal Reserve System (Federal Reserve), and the Federal Deposit Insurance Corporation (FDIC) (collectively, U.S. Regulatory Agencies) in alignment with the Basel 3 regulatory capital framework. These disclosures provide qualitative and quantitative information about regulatory capital and risk-weighted assets on a transition basis for the Standardized approach, and should be read in conjunction with our Form 10-Q for the period ended March 31, 2015 and Form 10-K for the year ended December 31, 2014.

The Corporation’s Pillar 3 disclosures may include some financial information that has not been prepared under accounting principles generally accepted in the United States of America (GAAP). Certain information contained in the Pillar 3 disclosures is prepared pursuant to instructions in the U.S. Basel 3 Final Rule (Basel 3).

Bank of America – Pillar 3 Regulatory Capital Disclosures

U.S. Regulatory Agencies permit certain Pillar 3 disclosure requirements to be addressed by their inclusion in the Consolidated Financial Statements of the Corporation. In such instances, incorporation into this report is made to the relevant section(s) of the most recent Forms 10-K and 10-Q filed with the Securities and Exchange Commission (SEC) of the United States. This Pillar 3 report should be read in conjunction with the aforementioned reports as information regarding regulatory capital risk management is largely contained in those filings. The table below indicates the location of such disclosures.

DISCLOSURE MAP

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SCOPE OF APPLICATION

Corporate Overview

Bank of America Corporation (together, with its consolidated subsidiaries, Bank of America, we or us) is a Delaware corporation, a bank holding company (BHC) and a financial holding company. When used in this report, “the Corporation” may refer to Bank of America Corporation individually, Bank of America Corporation and its subsidiaries, or certain of Bank of America Corporation’s subsidiaries or affiliates. As part of our efforts to streamline the Corporation’s organizational structure and reduce complexity and costs, the Corporation has reduced and intends to continue to reduce the number of its corporate subsidiaries, including through intercompany mergers. Bank of America is one of the world’s largest financial institutions, serving individual consumers, small- and middle-market businesses, institutional investors, large corporations and governments with a full range of banking, investing, asset management and other financial and risk management products and services. Our principal executive offices are located in the Bank of America Corporate Center, 100 North Tryon Street, Charlotte, North Carolina 28255.

Principles of Consolidation and Basis of Presentation

The Consolidated Financial Statements include the accounts of the Corporation and its majority-owned subsidiaries, and those variable interest entities (VIEs) where the Corporation is the primary beneficiary. Intercompany accounts and transactions have been eliminated. Results of operations of acquired companies are included from the dates of acquisition and for VIEs, from the dates that the Corporation became the primary beneficiary. Assets held in an agency or fiduciary capacity are not included in the Consolidated Financial Statements. The Corporation accounts for investments in companies for which it owns a voting interest and for which it has the ability to exercise significant influence over operating and financing decisions using the equity method of accounting. These investments are included in other assets. Equity method investments are subject to impairment testing and the Corporation’s proportionate share of income or loss is included in equity investment income.

The preparation of the Consolidated Financial Statements in conformity with accounting principles generally accepted in the United States of America (GAAP) requires management to make estimates and assumptions that affect reported amounts and disclosures. Realized results could differ from those estimates and assumptions. The basis for consolidation for both financial and regulatory reporting is in accordance with GAAP. Basel rules are applied to those financial statements and both on- and off-balance sheet exposures. For additional information refer to *Note 1 – Summary of Significant Accounting Principles* in the March 31, 2015 Form 10-Q and December 31, 2014 Form 10-K.

Basel 3 Regulatory Capital Standards and Disclosures

Basel 3 is a global regulatory capital framework developed by the Basel Committee on Banking Supervision. Basel 3 is composed of three parts, or pillars. Pillar 1 addresses capital adequacy and provides minimum capital requirements. Pillar 2 requires supervisory review of capital adequacy assessments and strategies. Pillar 3 promotes market discipline through prescribed regulatory public disclosures around capital structure, capital adequacy, and risk-weighted assets (RWA).

On January 1, 2014, the Corporation became subject to Basel 3 (Basel 3 Standardized – Transition). Basel 3 provides Tier 1 and Total capital calculations and establishes a Common equity tier 1 capital ratio. Basel 3 also includes minimum capital ratios and buffer requirements and a supplementary leverage ratio (SLR), and addresses the composition of regulatory capital and the adequately capitalized minimum requirements under the Prompt Corrective Action (PCA) framework. The composition of regulatory capital under Basel 3 is subject to a transition period as described below. The new minimum capital ratio requirements and related buffers are being phased in from January 1, 2014 through January 1, 2019. Basel 3 also expands and modifies the risk-sensitive calculation of risk-weighted assets (applicable to banks that meet the definition of an advanced approaches institution) and introduces a Standardized approach for the calculation of risk-weighted assets, which serves as a minimum. Basel 3 generally continues to be subject to interpretation and clarification by U.S. banking regulators.

As an advanced approaches institution, under Basel 3, the Corporation is required to complete a qualification period (parallel run) to demonstrate compliance with the Basel 3 rules to the satisfaction of U.S. banking regulators. Upon notification of approval by U.S. Regulatory Agencies to exit our parallel run, we will be required to report regulatory capital ratios and risk-weighted assets under both the Standardized and Advanced approaches. The approach that yields the lower ratio is to be used to assess capital adequacy including under the PCA framework. Prior to receipt of notification of approval, we are required to assess our capital adequacy under the Standardized approach only.

Information contained in this report is presented in accordance with the Basel 3 rules for risk-weighted assets and capital measurement under the Standardized approach, and follows the Pillar 3 disclosure requirements for the quantitative and qualitative presentation of data. Information presented herein may differ from similar information presented in the Consolidated Financial Statements and other publicly available disclosures. Unless specified otherwise, all amounts and information are presented in conformity with the definitions,

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rules, and requirements of Basel 3. For additional information on Basel 3 and management of the Corporation's regulatory capital refer to *Capital Management* within the MD&A section in the March 31, 2015 Form 10-Q and the December 31, 2014 Form 10-K, and *Note 16 – Regulatory Requirements and Restrictions* in the December 31, 2014 Form 10-K.

CAPITAL STRUCTURE

Under Basel 3, Total regulatory capital consists of two tiers of capital, Tier 1 and Tier 2. Tier 1 capital is further composed of Common equity tier 1 capital and additional tier 1 capital. Common equity tier 1 capital primarily includes qualifying common shareholders' equity, retained earnings, accumulated other comprehensive income and certain minority interests. Goodwill, disallowed intangible assets and certain disallowed deferred tax assets are excluded from Common equity tier 1 capital. Additional tier 1 capital primarily includes qualifying non-cumulative preferred stock, trust preferred securities (Trust Securities) subject to phase-out and certain minority interests. Certain deferred tax assets are also excluded. Tier 2 capital primarily consists of qualifying subordinated debt, a limited portion of the allowance for loan and lease losses, Trust Securities subject to phase-out and reserves for unfunded lending commitments. The Corporation's Total capital is the sum of Tier 1 capital plus Tier 2 capital. For additional information on the composition of regulatory capital, including regulatory adjustments and deductions made to Common equity tier 1 capital refer to *Capital Management* within the MD&A section in the March 31, 2015 Form 10-Q and *Note 16 – Regulatory Requirements and Restrictions* in the December 31, 2014 Form 10-K.

The following table presents regulatory capital composition as measured under Basel 3 Standardized – Transition at March 31, 2015.

Table 1 - Capital Composition	March 31, 2015
<i>(Dollars in millions)</i>	
Total common shareholder's equity	\$ 227,915
Goodwill	(69,231)
Intangibles, other than mortgage servicing rights and goodwill	(1,214)
Unamortized net periodic benefit costs recorded in accumulated OCI, net-of-tax	1,995
DVA related to structured liabilities and derivatives, net-of-tax	332
Deferred tax assets arising from net operating loss and tax credit carryforwards	(4,021)
Other	(338)
Common equity tier 1 capital	155,438
Qualifying preferred stock, net of issuance cost	22,273
Deferred tax assets arising from net operating loss and tax credit carryforwards under transition	(6,031)
DVA related to liabilities and derivatives under transition	498
Defined benefit pension fund assets	(459)
Trust preferred securities	1,447
Other	(11)
Total Tier 1 capital	173,155
Long-term debt qualifying as Tier 2 capital	19,538
Nonqualifying trust preferred securities subject to phase out from Tier 2 capital	4,843
Qualifying allowance for credit losses	14,213
Other	2,732
Total capital	\$ 214,481

For terms and conditions of common stock and preferred stock, refer to *Note 11 – Shareholders' Equity* in the March 31, 2015 Form 10-Q. For related breakdown of our accumulated OCI refer to *Note 12 – Accumulated Other Comprehensive Income (Loss)* in the March 31, 2015 Form 10-Q. For additional information on goodwill and intangibles, refer to *Note 8 – Goodwill and Intangible Assets* in the March 31, 2015 Form 10-Q. For additional information on trust preferred securities, refer to *Note 11 – Long-term Debt* in the December 31, 2014 Form 10-K.

CAPITAL ADEQUACY

Capital Adequacy is maintained as part of the capital management framework. This framework ensures sufficient capital is in place to meet our business needs and comply with current and future regulatory standards. Capital management is integrated into our risk and governance processes, as capital is a key consideration in the development of our strategic plan, risk appetite, and risk limits. We conduct an Internal Capital Adequacy Assessment Process (ICAAP) on a quarterly basis. The ICAAP is a forward-looking assessment of our projected capital needs and resources, incorporating earnings, balance sheet and risk forecasts under baseline and adverse economic and market conditions. We utilize quarterly stress tests to assess the potential impacts to our balance sheet, earnings, regulatory capital and liquidity under a variety of stress scenarios. We perform qualitative risk assessments to identify and assess material risks not fully captured in our forecasts or stress tests. For additional information regarding our capital management and capital planning, refer to *Capital Management* within the MD&A section in the March 31, 2015 Form 10-Q.

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The Federal Reserve requires BHCs to submit a capital plan and requests for capital actions on an annual basis, consistent with their Comprehensive Capital Analysis and Review (CCAR) requirements. The capital plan is the central element of the Federal Reserve's CCAR approach to ensure that large BHCs have adequate capital and robust processes for managing their capital.

Regulatory Capital Ratios

The following table presents Basel 3 Standardized approach Regulatory risk based capital ratios for the Corporation and BANA at March 31, 2015.

<i>(Dollars in millions)</i>	Bank of America Corporation	Bank of America, N.A.	Bank of America California, N.A.
Regulatory Capital			
Common equity tier 1 capital	\$ 155,438	\$ 145,042	\$ 2,720
Tier 1 capital	173,155	145,042	2,720
Total capital	214,481	161,662	2,832
Assets			
Risk-weighted assets	\$ 1,405,267	\$ 1,151,155	\$ 8,927
Adjusted average assets	2,059,647	1,525,242	26,166
Capital Ratios			
Common equity tier 1 capital	11.1%	12.6%	30.5%
Tier 1 capital	12.3	12.6	30.5
Total capital	15.3	14.0	31.7
Tier 1 leverage	8.4	9.5	10.4

	Bank Holding Company		Insured Depository Institutions	
	Regulatory Minimum	Well- Capitalized ¹	Regulatory Minimum	Well- Capitalized ²
Capital Ratios				
Common equity tier 1 capital	4.5%	n/a	4.5%	6.5%
Tier 1 capital	6.0	6.0%	6.0	8.0
Total capital	8.0	10.0	8.0	10.0
Tier 1 leverage	4.0	n/a	4.0	5.0

¹ To be "well capitalized" under current U.S. banking regulatory agency definitions, a bank holding company must maintain these ratios or greater and not be subject to a Federal Reserve Board order or directive to maintain higher capital levels.

² Percent required to meet guidelines to be considered "well capitalized" under the Prompt Corrective Action framework.

As of March 31, 2015, Bank of America, all of its U.S. banking subsidiaries, and other regulated subsidiaries were well-capitalized and met all capital requirements to which each was subject. The aggregate amount of surplus capital of subsidiaries engaged in insurance business was \$305 million. For additional information regarding regulatory capital and capital ratios for the Corporation refer to *Table 15 – Bank of America Corporation Regulatory Capital* and for BANA refer to *Table 19 – Bank of America, N.A. Regulatory Capital* in the March 31, 2015 Form 10-Q.

Risk-Weighted Assets

Under the Basel 3 Standardized approach, RWAs are calculated based on product type (e.g., mortgages, high volatility commercial real estate) and obligor type (e.g., sovereign, bank). The following table presents risk-weighted assets by risk and exposure type under the Basel 3 Standardized approach at March 31, 2015.

Wholesale		
Sovereign		\$ 3,265
Government Sector Entities		36,579
Depository Institutions/Foreign Banks/Credit Unions		25,141
Public Sector Entities		13,443
Corporate		528,097
High Volatility Commercial Real Estate		1,604
Retail		
Residential Mortgage		178,673
Qualifying Revolving Exposures		97,042
Other Retail		78,319
Other		
Past Due Loans		3,638
Cleared Transactions		14,577
Default Fund Contributions		2,848
Unsettled Transactions		920
All Other		78,287
Securitization Exposures		53,602
Counterparty Exposures		154,830
Equity Exposures		27,756
Market Risk		106,646
Total RWA		\$ 1,405,267

CREDIT RISK

Credit risk is the risk of loss arising from the inability or failure of a borrower or counterparty to meet its obligations. Economic or market disruptions, insufficient credit loss reserves or concentration of credit risk may result in an increase in the provision for credit losses, which could have an adverse effect on our financial condition and results of operations. A number of our products expose us to credit risk, including loans and leases, letters of credit, derivatives, and assets held-for-sale. The financial condition of our consumer and commercial borrowers and counterparties could adversely affect our earnings.

Global and U.S. economic conditions may impact our credit portfolios. To the extent economic or market disruptions occur, such disruptions would likely increase the risk that borrowers or counterparties would default or become delinquent on their obligations to us. Increases in delinquencies and default rates could adversely affect our consumer portfolios through increased charge-offs and provision for credit losses. Additionally, increased credit risk could adversely affect our commercial loan portfolios with weakened customer and collateral positions. For additional detail regarding the assessment of credit risk as it relates to loans and leases, refer to *Credit Risk Management* within the MD&A section in the March 31, 2015 Form 10-Q.

The Board of Directors (Board) is responsible for the oversight of the management of the Corporation. As part of its oversight, the Board oversees the management of the various types of risk faced by the Corporation. The Credit Committee is a board level committee and is responsible for oversight of senior management's identification and management of credit exposures on an enterprise wide basis, as well as the Corporation's responses to trends affecting those exposures. The Management Risk Committee (MRC) is responsible for management oversight of all key risks facing the Corporation. For additional information regarding the Corporation's credit risk management policy, refer to *Managing Risk* and *Credit Risk Management* within the MD&A section in the March 31, 2015 Form 10-Q and the December 31, 2014 Form 10-K.

Credit Risk Exposures

Credit risk exposures (calculated according to exposure type) as reported under GAAP can be found within the Corporation's most recent SEC filings. For additional information, the specific references related to credit risk are listed below.

Accounting Policies – For information on internal policies governing past due and delinquency status, nonaccrual, allowance for credit losses, and charge-off of uncollectible accounts refer to *Note 1 – Summary of Significant Accounting Principles* in the December 31, 2014 Form 10-K.

Average Balances – For average asset balances refer to *Table 11 – Quarterly Average Balances and Interest Rates – FTE Basis* in the March 31, 2015 Form 10-Q.

Outstanding Loans and Leases – The Corporation utilizes a Consumer and Commercial portfolio segmentation approach to present information related to loans and leases. For additional information regarding loans and leases including non-performing, past due and impaired loans, refer to *Note 4 – Outstanding Loans and Leases* and *Credit Risk Management* within the MD&A section in the March 31, 2015 Form 10-Q, and *Table IX – Selected Loan Maturity Data* in the December 31, 2014 Form 10-K.

Allowance for Credit Losses – For additional information regarding the change in allowance for credit losses, including charge-offs, recoveries, provision for credit losses, and a reconciliation of changes in allowance for loan and lease losses refer to *Allowance for Credit Losses* within the MD&A section and *Note 5 – Allowance for Credit Losses* in the March 31, 2015 Form 10-Q.

Investment Securities – For additional information related to securities, refer to *Note 3 – Securities* in the March 31, 2015 Form 10-Q.

Derivatives – For additional information related to the derivative positions of the Corporation, refer to *Note 2 – Derivatives* in the March 31, 2015 Form 10-Q. For additional information regarding purchased and sold credit derivatives, collateral held, and gross positive fair value refer to Schedule HC-L “Derivatives and Off-Balance Sheet Items” in Bank of America’s March 31, 2015 FR Y-9C “Consolidated Financial Statements for Holding Companies.”

Off-Balance Sheet Exposures – For additional information regarding the off-balance sheet exposures for the Corporation, refer to *Note 10 – Commitments and Contingencies* in the March 31, 2015 Form 10-Q.

Credit Exposures by Geographic / Industry Distribution – For additional information regarding the geographic and industry distribution of credit exposures categorized by exposure type, refer to *Credit Risk Management* within the MD&A section in the March 31, 2015 Form 10-Q.

COUNTERPARTY CREDIT RISK

Counterparty credit risk for over-the-counter (OTC) derivatives, eligible margin loans, and repo-style transactions is the risk that a counterparty to a transaction may default before completing the satisfactory settlement of the transaction. An economic loss occurs if the transaction or portfolio of transactions with the counterparty has a positive replacement cost or outstanding loan amount that exceeds any collateral posted by the counterparty before the transaction(s) could be unwound, in the case of counterparty default. The Corporation estimates the potential future replacement costs and collateral values of each portfolio over appropriate unwind periods.

Several methods are used to calculate exposure amounts for counterparty credit risk of OTC derivatives. Regulatory capital for counterparty credit risk related to OTC derivatives is primarily determined using the current exposure method (CEM). Under the current exposure methodology, exposure at default (EAD) is determined by adding the sum of the Corporation’s current exposure and potential future exposure (PFE), defined as the product of the transaction notional amount and a conversion factor based on remaining maturity and transaction type (e.g., interest rate, foreign exchange, etc.). Eligible margin loans and repo-style transactions use the supervisory haircut approach. In the supervisory haircut approach, the exposure amount is adjusted upwards through the application of supervisory haircuts on collateral.

In connection with certain OTC derivative contracts and other agreements, the Corporation could be required to provide additional collateral or to terminate transactions with certain counterparties in the event of a downgrade of the senior debt ratings of the Corporation and its subsidiaries. The amount of additional collateral required depends on the contract and is usually a fixed incremental amount and/or the market value of the exposure. For additional information about the impact of a credit rating downgrade, refer to *Table 26 – Additional Collateral Required to be Posted Upon Downgrade* in the March 31, 2015 Form 10-Q.

Valuation Adjustments

We record counterparty credit risk valuation adjustments on the Corporation’s derivative assets in order to properly reflect the credit risk of the counterparty. We calculate a credit valuation adjustment (CVA) based on a market credit spread and a modeled expected exposure that incorporates market risk factors that affect the value of a derivative. The exposure also takes into consideration credit risk mitigation such as legally enforceable master netting agreements and collateral. We also record a debit valuation adjustment to properly reflect our own credit risk exposure as part of the fair value of derivative instruments and/or structured liabilities, as well as a funding valuation adjustment to include funding costs on uncollateralized derivatives and derivatives where the Corporation is not permitted to rehypothecate the collateral it receives. For additional information, refer to *Note 2 – Derivatives* and *Note 14 – Fair Value Measurements* in the March 31, 2015 Form 10-Q.

Risk Mitigation

There are a number of techniques that the Corporation utilizes to manage counterparty credit risk. These include but are not limited to netting, collateral agreements and credit enhancements. Substantially all of the Corporation's derivative contracts contain credit risk related contingency features. OTC derivative transactions are generally executed under an industry standard approved form of a master netting agreement primarily in the form of International Swaps and Derivatives Association, Inc. (ISDA) master agreements that provide the Corporation the right to offset amounts owed to the counterparty against amounts owed by the same counterparty and provides other rights such as the ability for the Corporation to terminate a transaction upon default. Secured financing transactions are generally executed under standard Master Repurchase Agreements (MRA), Securities Lending Agreements (SLA) and other agreements that would serve similar purposes with respect to netting and termination provisions.

Credit enhancements include a variety of provisions that may be used to reduce the credit risk related to a transaction or counterparty. Events such as a credit rating downgrade (depending on the resulting rating level) or a breach of credit covenants would typically require an increase in the amount of collateral required of the counterparty and/or allow the Corporation to take additional protective measures such as early termination of all trades. These contingency features may be for the benefit of the Corporation as well as its counterparties with respect to changes in the Corporation's creditworthiness. For additional information on collateral, refer to the *Collateral* section in *Note 1 – Summary of Significant Accounting Principles* in the December 31, 2014 Form 10-K.

Credit Limits

As part of the overall credit risk assessment, our commercial credit exposures are assigned a risk rating and are subject to approval based on defined credit approval standards. In making credit decisions, we consider risk rating, collateral, country, industry and single name concentration limits while also balancing this with the total borrower or counterparty relationship. Our business and risk management personnel use a variety of tools to continuously monitor the ability of a borrower or counterparty to perform under its obligations. For additional information on credit limits, refer to *Managing Risk* and *Credit Risk Management* within the MD&A section in the March 31, 2015 Form 10-Q.

Collateral Valuation

Many of our derivative transactions are executed under collateral agreements. Collateral consists of assets that are pledged as security by a single counterparty to another as assurance of payment or performance against an obligation. Collateral agreements generally provide the Corporation the right to liquidate collateral held as payment in the event of a counterparty default. Collateral is managed by a centralized team and most contracts are subject to a daily mark-to-market process. Collateral movements are generally executed daily in accordance with the Corporation's standard bilateral agreement with the counterparty. Collateral permits the reduction of the overall exposure to the counterparty by netting the positive market value of a transaction against the market value of the collateral held after haircut adjustment. For additional information, refer to *Note 2 – Derivatives* and *Note 14 – Fair Value Measurements* in the March 31, 2015 Form 10-Q.

The Corporation's credit policy defines acceptable forms of collateral for OTC derivatives, repo-style transactions, and eligible margin loans, and is generally limited to cash, U.S. Treasury securities, U.S. agency securities and select Government Sponsored Agency mortgage-backed securities (MBS), and certain high quality sovereign securities. For additional information, refer to *Note 1 – Summary of Significant Accounting Principles* in the December 31, 2014 Form 10-K.

Counterparty Credit Risk Exposures

The following table presents the EAD of OTC derivatives, repo-style transactions and eligible margin loans for the Corporation at March 31, 2015.

	EAD		RWA	
OTC derivatives	\$	302,010	\$	119,463
Repo-style transactions & Eligible margin loans		85,938		64,668
Total	\$	387,948	\$	184,131

CREDIT RISK MITIGATION

The Corporation manages credit risk based on the risk profile of the borrower or counterparty, repayment sources, the nature of underlying collateral, hedging options available and other support given current events, conditions and expectations. The Corporation proactively refines its underwriting and credit management practices, as well as credit standards, to meet the changing economic environment. As part of its credit risk and portfolio management activities, the Corporation purchases credit protection in the form of

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guarantees, private credit risk insurance and credit derivatives to hedge exposures that it purchases, originates or participates in such as loans and investment securities. Under Basel 3, the Corporation recognizes the risk mitigating effect of qualifying credit risk hedges on banking book wholesale exposures in its regulatory capital calculations. Eligible credit hedges which the Corporation typically uses to avail the regulatory capital relief include guarantees and credit protection purchased from third parties. Eligible credit default swap counterparties serving as guarantors of credit risks in the banking book include commercial banks, investment banks and insurance companies.

Apart from using the eligible credit hedges to mitigate credit risk of the wholesale exposures as described above, the Corporation also uses other risk mitigation techniques to manage the size and risk profile of the loan portfolio such as syndication of exposures to third parties, loan sales and portfolio risk diversification through loan size and geography. The Corporation also reviews, measures and manages commercial real estate loans by geographic location and property type.

The Corporation assesses credit risk using comprehensive tools and measures to allow us to identify and mitigate emerging risks before they become material. One process utilizes an analysis of commercial utilized credit exposure by industry based on Standard & Poor's (S&P) industry classifications. This analysis includes commercial loans and leases, standby letters of credit (SBLCs) and financial guarantees, derivative assets, assets held-for-sale and commercial letters of credit. Additional analysis focuses on outstanding commercial real estate loans by the geographic region where the property is located as well as the type of property to assess any concentrations. For additional information on credit risk mitigation, refer to *Credit Risk Management* within the MD&A section in the March 31, 2015 Form 10-Q.

The table below quantifies the wholesale portfolios covered by credit derivatives and guarantees at March 31, 2015.

	EAD	RWA
Corporate	\$ 11,781	\$ 2,349
Depository Institutions/Foreign Banks/Credit Unions	884	117
Sovereign	400	-
All Other	67	13
Total	\$ 13,133	\$ 2,479

SECURITIZATION

Securitization exposures under Basel 3 are defined as an on- or off-balance sheet credit exposure that arises from a traditional or synthetic securitization (including credit-enhancing representations and warranties). Traditional securitization exposures are those where all or a portion of the credit risk of one or more underlying exposures is transferred to one or more third parties other than through the use of credit derivatives or guarantees, whereas synthetic securitizations utilize derivatives or guarantees to transfer the risk to a third-party. Re-securitization is the process of repackaging existing securitization securities into new securities with credit enhanced tranches for investors. Additionally, in all instances, securitizations reflect exposures where the credit risk has been separated into at least two tranches reflecting differing levels of seniority, performance of the securitization depends on the performance of the underlying exposures; and all or substantially all of the underlying exposures are financial exposures. U.S. agency mortgage-backed securitizations (i.e., Fannie Mae, Freddie Mac and Ginnie Mae) that issue pass-through securities that are not broken into two or more tranche levels of seniority are not considered securitizations under the Basel 3 definition and are not included in the discussion that follows.

The Corporation routinely securitizes loans and debt securities. These securitizations are a source of funding for the Corporation and a means of transferring the economic risk of the loans or debt securities to third parties. In a securitization, various classes of debt securities may be issued and are generally collateralized by a single class of transferred assets which most often consists of residential mortgages, but may also include commercial mortgages, credit card receivables, home equity loans, automobile loans, student loans, mortgage-backed securities, municipal bonds or other securities. Loans that have been securitized may be serviced by the Corporation or by third parties. With each securitization, the Corporation may retain a portion of the securities, subordinated tranches, interest-only strips, subordinated interests in accrued interest and fees on the securitized receivables or, in some cases, overcollateralization and cash reserve accounts, all of which are referred to as retained interests.

The Corporation follows the Basel 3 prescribed hierarchy of approaches for computation of capital related to securitization exposures and applies Simplified Supervisory Formula Approach (SSFA) provided the Corporation is able to meet the operational requirements related to data and modeling as required by these methodologies. The Corporation applies a 1250 percent risk weight to those securitization exposures where SSFA cannot be applied.

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Securitization Positions

For each activity where we have credit and market risk to securitization and re-securitization positions, including liquidity risk, portfolio risk and seller's risk, the Corporation has a method to monitor these risks. Methods to monitor credit and market risk may vary based on the type of securitization portfolio. For additional information regarding risk mitigation for securitizations, refer to *Note 6 – Securitizations and Other Variable Interest Entities* in the March 31, 2015 Form 10-Q.

Roles within Securitization Processes

Through its broker-dealer subsidiaries, the Corporation may structure and underwrite traditional or synthetic securitization vehicles for use by other subsidiaries of the Corporation or third parties.

The Corporation may serve as originator, investor and servicer/collateral manager of assets transferred into traditional securitization vehicles. The Corporation may also provide credit enhancement or serve as liquidity provider to securitization vehicles. As an investor, the Corporation and its subsidiaries hold securitization positions from third-party originated deals and in some instances from internally originated deals.

Accounting Policies

The Corporation's accounting policies as they relate to securitization and securitization vehicles are in accordance with GAAP. For additional information, refer to *Note 1 – Summary of Significant Accounting Principles* in the December 31, 2014 Form 10-K and *Note 6 – Securitizations and Other Variable Interest Entities* in the March 31, 2015 Form 10-Q.

Securitization Exposures

The following table presents the Corporation's total outstanding principal amount of assets securitized by the Corporation (excluding assets in consolidated securitization variable interest entities) for which the Corporation retains an exposure that is not subject to the market risk capital rules. Third-party assets held in Bank of America-sponsored vehicles are shown separately from securitized assets that were originated or purchased by the Corporation. Assets that are 90 days or more past due or in nonaccrual status are shown below in the last column.

Table 6 - Principal Amount Outstanding and Exposures Past Due by Underlying Collateral Type March 31, 2015
(Dollars in millions)

	Principal Amount Outstanding			Assets impaired or past due
	BAC assets held in traditional securitizations	Third-party assets held in traditional securitizations	BAC assets held in synthetic securitizations	
Collateral Type:				
Residential Mortgage	\$ 99,100	\$ 2,295	\$ -	\$ 26,696
Commercial Mortgage	-	-	-	-
Commercial and Industrial	-	-	-	-
Consumer Auto	-	-	-	-
Student Loans	-	-	-	-
Municipal Bonds	3,460	-	-	-
Other	-	-	-	-
Total	\$ 102,559	\$ 2,295	\$ -	\$ 26,696

The following table presents the amount of on- and off-balance sheet securitization exposures by underlying exposure type as of March 31, 2015.

Table 7 - Total Securitization EAD and RWA March 31, 2015
(Dollars in millions)

	EAD			RWA
	On-Balance Sheet	Off-Balance Sheet	Total	
Residential Mortgage	\$ 17,421	\$ 1,173	\$ 18,595	\$ 27,197
Commercial Mortgage	1,033	11	1,044	631
Commercial and Industrial	10,227	4,115	14,342	18,790
Consumer Auto	7,055	3,287	10,342	2,546
Student Loans	2,031	361	2,393	889
Municipal Bonds	-	2,045	2,045	515
Other	3,637	5,111	8,748	3,034
Total	\$ 41,405	\$ 16,104	\$ 57,509	\$ 53,602

As of March 31, 2015 no securitization exposures were deducted from the Corporation's regulatory capital.

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The following table presents securitization exposures by risk-weight bands as of March 31, 2015.

Table 8 - Securitization EAD and RWA by Risk Weights (Dollars in millions)	SSFA		1250%		Total	
	EAD	RWA	EAD	RWA	EAD	RWA
	Securitization					
= 0% ≤ 20%	\$ 37,808	\$ 7,562	\$ -	\$ -	\$ 37,808	\$ 7,562
> 20% and ≤ 50%	3,959	1,223	-	-	3,959	1,223
> 50% and ≤ 100%	3,870	3,184	-	-	3,870	3,184
> 100% and ≤ 1250%	6,475	24,414	-	-	6,475	24,414
= 1250%	174	2,178	441	5,514	615	7,692
Re-securitization						
= 0% ≤ 20%	1,521	304	-	-	1,521	304
> 20% ≤ 50%	886	328	-	-	886	328
> 50% ≤ 100%	973	594	-	-	973	594
> 100% < 1250%	1,211	5,929	-	-	1,211	5,929
= 1250%	190	2,373	-	-	190	2,373
Total Securitization	\$ 57,068	\$ 48,088	\$ 441	\$ 5,514	\$ 57,509	\$ 53,602

As of March 31, 2015 the credit risk mitigation benefit for re-securitization exposures total was \$225 million in aggregate.

The total amount of exposures intended to be securitized as of March 31, 2015 was \$3.5 billion, made up of \$693 million in residential mortgages, \$2.8 billion in other consumer loans and other exposures types of \$87 million.

For additional information regarding securitization exposures, including exposures securitized by the Corporation, gains (losses) recognized during the period, and securitization activity, refer to *Note 6 – Securitizations and Other Variable Interest Entities* in the March 31, 2015 Form 10-Q.

MARKET RISK OVERVIEW

Market risk is the risk that values of assets and liabilities or revenues will be adversely affected by changes in market conditions. This risk is inherent in the financial instruments associated with our operations, primarily within our Global Markets segment. We are also exposed to these risks in other areas of the Corporation (e.g., our ALM activities). In the event of market stress, these risks could have a material impact on the results of the Corporation. For additional information, refer to *Market Risk Management* within the MD&A section in the March 31, 2015 Form 10-Q and the December 31, 2014 Form 10-K.

Our traditional banking loan and deposit products are non-trading positions and are generally reported at amortized cost for assets or the amount owed for liabilities (historical cost). However, these positions are still subject to changes in economic value based on varying market conditions, with one of the primary risks being changes in the levels of interest rates. The risk of adverse changes in the economic value of our non-trading positions arising from changes in interest rates is managed through our Asset Liability Management (ALM) activities. We have elected to account for certain assets and liabilities under the fair value option. For additional information on the fair value of certain financial assets and liabilities, refer to *Note 14 – Fair Value Measurements* in the March 31, 2015 Form 10-Q.

Trading Book

Our trading positions are reported at fair value with changes reflected in income. Trading positions are subject to various changes in market-based risk factors. The majority of this risk is generated by our activities in the interest rate, foreign exchange, credit, equity and commodities markets. In addition, the values of assets and liabilities could change due to market liquidity, correlations across markets and expectations of market volatility. We seek to manage these risk exposures by using a variety of techniques that encompass a broad range of financial instruments. The key risk management techniques are discussed in more detail in the Trading Risk Management section.

A subcommittee has been designated by the Management Risk Committee (MRC) as the primary risk governance authority for Global Markets (Global Markets, or GM, subcommittee). The GM subcommittee's focus is to take a forward-looking view of the primary credit, market and operational risks impacting Global Markets and prioritize those that need a proactive risk mitigation strategy.

Global Markets Risk Management is responsible for providing senior management with a clear and comprehensive understanding of the trading risks to which the Corporation is exposed. These responsibilities include ownership of market risk policy, developing and maintaining quantitative risk models, calculating aggregated risk measures, establishing and monitoring position limits consistent with risk appetite, conducting daily reviews and analysis of trading inventory, approving material risk exposures and fulfilling regulatory

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requirements. Market risks that impact businesses outside of Global Markets are monitored and governed by their respective governance functions.

The bank regulatory agencies in the U.S. issued revised market risk capital guidelines (Market Risk Final Rule), which became effective on January 1, 2013. These rules were incorporated by the Basel 3 final rule with minimal changes. The Market Risk Final Rule introduced new measures of market risk including a charge related to stressed VaR, an incremental risk charge (IRC) and the comprehensive risk measure (CRM), as well as other technical modifications including the requirements for covered positions. The calculation of regulatory capital under the Market Risk Final Rule, which was adopted in the Basel 3 final rule, is determined through the use of multiple risk measures and is applicable to covered positions. These measures are then aggregated to arrive at the total market risk regulatory capital.

Covered positions are defined by regulatory standards as trading assets and liabilities, both on- and off-balance sheet, that meet a defined set of specifications. These specifications identify the most liquid trading positions which are intended to be held for a short-term horizon and where the Corporation is able to hedge the material risk elements in a two-way market. Positions in less liquid markets, or where there are restrictions on the ability to trade the positions, typically do not qualify as covered positions. Foreign exchange and commodity positions are always considered covered positions, except for structural foreign currency positions that we choose to exclude with prior regulatory approval. The characterization of an exposure as a trading asset or liability under GAAP does not necessarily determine its treatment under Basel 3. Trading assets or liabilities that do not meet the regulatory definition of a covered position are excluded from market risk capital treatment and subjected to the credit risk capital rules as non-covered exposures. The Corporation maintains policies and procedures for determination of exposures meeting the covered position definition.

The table below presents the components of total Basel 3 Market Risk RWA.

Table 9 - Market Risk - RWA
(Dollars in millions)

	March 31, 2015		December 31, 2014		March 31, 2014	
	Capital	RWA	Capital	RWA	Capital	RWA
Regulatory VaR 10-day holding period ¹	\$ 609	\$ 7,607	\$ 401	\$ 5,009	\$ 601	\$ 7,518
Stressed VaR 10-day holding period ¹	2,201	27,515	1,667	20,838	2,325	29,059
Incremental risk charge	837	10,458	934	11,676	580	7,246
Comprehensive risk measure	1,076	13,447	1,180	14,745	1,444	18,047
a. Standard specific risk charges	2,011	25,135	1,811	22,633	2,507	31,336
b. Securitization framework	1,509	18,869	1,684	21,053	1,675	20,935
Standard specific risk	3,520	44,004	3,495	43,686	4,182	52,271
Other charges ²	261	3,258	331	4,140	295	3,693
De minimis covered positions	29	357	29	358	27	338
Total	\$ 106,646		\$ 100,451		\$ 118,172	

¹ A multiplier of three is used to determine VaR and Stressed VaR Capital numbers based on a 60-day average.

² Other charges are comprised of modeled specific risk and other modeled charges, as approved by the Regulators.

The increase in Market Risk RWA for the three months ended March 31, 2015 compared to the three months ended December 31, 2014 is mainly attributable to a \$9.2 billion increase in VaR and SVaR primarily due to increased risk in Global Markets, and a \$2.5 billion RWA increase in standard charges primarily driven by the inclusion of the structured notes population in the trading book. This is partially offset by a \$2.5 billion RWA decrease in IRC and CRM and a \$2.2 billion RWA decrease in Securitization.

The decrease in market risk RWA for the three months ended March 31, 2015 compared to the three months ended March 31, 2014 is mainly attributable to an \$8.2 billion decrease in standard specific risk primarily, driven by inventory reductions, a \$4.6 billion decrease in comprehensive risk measure charges, and a \$1.5 billion reduction in SVaR. This was offset by a \$3.2 billion increase in IRC.

Model Risk Management

Quantitative risk models, such as VaR, are an essential component in evaluating the market risks within a portfolio. A subcommittee of the MRC is responsible for providing management oversight and approval of model risk management and governance (Risk Management, or RM, subcommittee). The RM subcommittee defines model risk standards, consistent with the Corporation's risk framework and risk appetite, prevailing regulatory guidance and industry best practice. Models must meet certain validation criteria, including effective challenge of the model development process and a sufficient demonstration of developmental evidence incorporating a comparison of alternative theories and approaches. The RM subcommittee ensures model standards are consistent with model risk requirements and monitors the effective challenge in the model validation process across the Corporation. In addition, the relevant stakeholders must agree on any required actions or restrictions to the models and maintain a stringent monitoring process to ensure continued compliance.

Trading Risk Management

To evaluate risk in our trading activities, we focus on the actual and potential volatility of revenues generated by individual positions as well as portfolios of positions. Various techniques and procedures are utilized to enable the most complete understanding of these risks.

Quantitative measures of market risk are evaluated on a daily basis from a single position to the portfolio of the Corporation. These measures include sensitivities of positions to various market risk factors, such as the potential impact on revenue from a one basis point change in interest rates, and statistical measures utilizing both actual and hypothetical market moves, such as VaR and stress testing. Periods of extreme market stress influence the reliability of these techniques to varying degrees. Qualitative evaluations of market risk utilize the suite of quantitative risk measures while understanding each of their respective limitations. Additionally, risk managers independently evaluate the risk of the portfolios under the current market environment and potential future environments. For more information, please refer to *Trading Risk Management* within the MD&A section in the March 31, 2015 Form 10-Q.

Value-at-Risk (VaR)

VaR is a common statistic used to measure market risk as it allows the aggregation of market risk factors, including the effects of portfolio diversification. A VaR model simulates the value of a portfolio under a range of scenarios in order to generate a distribution of potential gains and losses. VaR represents the loss a portfolio is not expected to exceed more than a certain number of times per period, based on a specified holding period, confidence level and window of historical data. We use one VaR model consistently across the trading portfolios and it uses a historical simulation approach based on a three-year window of historical data. Our primary VaR statistic is equivalent to a 99 percent confidence level. This means that for a VaR with a one-day holding period, there should not be losses in excess of VaR, on average, 99 out of 100 trading days.

Within any VaR model, there are significant and numerous assumptions that will differ from company to company. The accuracy of a VaR model depends on the availability and quality of historical data for each of the risk factors in the portfolio. A VaR model may require additional modeling assumptions for new products that do not have the necessary historical market data or for less liquid positions for which accurate daily prices are not consistently available. For positions with insufficient historical data for the VaR calculation, the process for establishing an appropriate proxy is based on fundamental and statistical analysis of the new product or less liquid position. This analysis identifies reasonable alternatives that replicate both the expected volatility and correlation to other market risk factors that the missing data would be expected to experience.

VaR may not be indicative of realized revenue volatility as changes in market conditions or in the composition of the portfolio can have a material impact on the results. In particular, the historical data used for the VaR calculation might indicate higher or lower levels of portfolio diversification than will be experienced. In order for the VaR model to reflect current market conditions, we update the historical data underlying our VaR model on a weekly basis, or more frequently during periods of market stress, and regularly review the assumptions underlying the model. A relatively minor portion of risks related to our trading positions are not included in VaR. These risks are reviewed as part of our ICAAP.

Global Markets Risk Management continually reviews, evaluates and enhances our VaR model so that it reflects the material risks in our trading portfolio. Changes to the VaR model are reviewed and approved prior to implementation and any material changes are reported to management through the appropriate management committees.

The VaR statistic used for the regulatory capital calculation shown in Table 10 is defined by regulatory standards (Regulatory VaR) and it differs from the VaR statistic disclosed in the Corporations' SEC disclosures (Disclosure VaR) due to differences in the population and holding period. Regulatory standards require that Regulatory VaR only include the Covered Position portfolio, while the Disclosure VaR includes other positions that are not considered Covered Positions. The holding period for Regulatory VaR is ten days while for Disclosure VaR it is one day. Both Regulatory VaR and Disclosure VaR utilize the same process and methodology.

Within the tables below, the VaR for each of the risk factors captures the expected loss with a 99 percent confidence level, similar to a stress scenario for each discrete risk factor. For example, the VaR for the interest rate risk factor identifies the potential loss the Corporation is not expected to exceed more than one out of every 100 days based on the previous three years of historical data for just the interest rate risk in the Corporation's portfolio. The historical days that generate these hypothetical losses might be different than the historical days that generate the hypothetical losses for the credit spread risk factor or for the Corporation's total portfolio. The combination of the potentially different historical days that generate the hypothetical losses for each risk factor is what produces the diversification benefit across the portfolio. As a result, the sum of the VaRs by risk factor is greater than the total regulatory VaR.

Regulatory VaR does not incorporate the value that Covered Positions would gain or lose, in the absence of market moves, as they move toward expiration, which is known as time decay. Therefore, for certain portfolios the distribution of potential gains and losses estimated by the VaR model can produce a Regulatory VaR result that is not a loss.

Regulatory VaR

The market risk related to all covered positions to which the Corporation is exposed is included in the total regulatory VaR results. The majority of this portfolio is within the *Global Markets* segment. The table below presents the Regulatory VaR results by risk factors for the period end, average, high and low results. The values shown in the table below include all trading days for the three months ended March

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31, 2015 whereas the average Regulatory VaR used for the capital calculation is based on the 60 trading days ending March 31, 2015. Therefore the values used for the capital calculation in the preceding table can be different than the values presented in the table below.

Table 10 - Market Risk - Total Regulatory VaR

March 31, 2015

(Dollars in millions)

	Regulatory VaR					
	10-day Holding Period					
	Period End	Average	High ¹	Low ¹		
Foreign exchange	\$ 57	\$ 44	\$ 126	\$ 13		
Interest rate	139	152	211	102		
Credit	179	166	186	150		
Equities	4	10	29	(4)		
Commodities	16	19	28	13		
Portfolio diversification	(200)	(189)	-	-		
Total Regulatory VaR	\$ 195	\$ 202	\$ 263	\$ 109		

¹The high and low for the total portfolio may have occurred during different trading days than the high and low for the individual components. Therefore the amount of portfolio diversification, which is the difference between the total portfolio and the sum of the individual components, is not relevant for the High and Low results.

Trading limits on quantitative risk measures, including VaR, are monitored on a daily basis. These trading limits are independently set by Global Markets Risk Management and reviewed on a regular basis to ensure they remain relevant and within our overall risk appetite for market risks. Trading limits are reviewed in the context of market liquidity, volatility and strategic business priorities. Trading limits are set at both a granular level to ensure extensive coverage of risks as well as at aggregated portfolios to account for correlations among risk factors. All trading limits are approved at least annually and the MRC has given authority to the GM subcommittee to approve changes to trading limits throughout the year. Approved trading limits are stored and tracked in a centralized limits management system. Trading limit excesses are communicated to management for review. Certain quantitative market risk measures and corresponding limits have been identified as critical in the Corporation's Risk Appetite Statement. These risk appetite limits are monitored on a daily basis and are approved at least annually by the Enterprise Risk Committee (ERC) and the Board of Directors. The Corporation's risk appetite limits for market risk were not exceeded during the three months ended March 31, 2015.

In periods of market stress, the GM subcommittee members communicate daily to discuss losses, key risk positions and any limit excesses. As a result of this process, the businesses may selectively reduce risk.

Backtesting

The accuracy of the VaR methodology is evaluated by backtesting, which compares the daily VaR results, utilizing a one-day holding period, against a comparable subset of trading revenue. A backtesting excess occurs when a trading loss exceeds the VaR for the corresponding day. These excesses are evaluated to understand the positions and market moves that produced the trading loss and to ensure that the VaR methodology accurately represents those losses. As our primary VaR statistic used for backtesting is based on a 99 percent confidence level and a one-day holding period, we expect one trading loss in excess of VaR every 100 days, or between two to three trading losses in excess of VaR over the course of a year. The number of backtesting excesses observed can differ from the statistically expected number of excesses if the current level of market volatility is materially different than the level of market volatility that existed during the three years of historical data used in the VaR calculation.

We conduct daily backtesting on our portfolios, ranging from the Total Regulatory VaR to individual trading areas. Additionally, we conduct daily backtesting on the VaR results for key legal entities, regions and risk factors. These results are reported to senior market risk management. Senior management regularly reviews and evaluates the results of these tests.

The trading revenue used for backtesting is defined by regulatory agencies in order to most closely align with the VaR component of the regulatory capital calculation. This revenue differs from total trading-related revenue in that it excludes revenue from trading activities that either do not generate market risk or the market risk cannot be included in VaR. Some examples of the types of revenue excluded for backtesting are fees, commissions, reserves, net interest income and intraday trading revenues.

During the three and twelve months ended March 31, 2015, there was one day in which there was a backtesting excess for our Total Regulatory VaR results, utilizing a one-day holding period. This backtesting excess was due to elevated market volatility experienced during the three months ending December 31, 2014.

Stressed Value-at-Risk (VaR)

Stressed VaR is a variation of VaR in which the historical window is not the previous three years but is calibrated to a continuous 12 month window that reflects a period of significant financial stress appropriate to the Corporation's current portfolio. Stressed VaR is

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calculated daily based on a 99 percent confidence level, a ten-day holding period and the same population of exposures as the Regulatory VaR. The Corporation utilizes a single model and process to calculate all Regulatory VaR, Stressed VaR, and Disclosure VaR statistics.

The following table presents the Stressed VaR results for the period end, average, high and low calculated over a ten-day holding period. The values shown in the following table include all trading days for the three months ended March 31, 2015 whereas the average Regulatory Stressed VaR used for the capital calculation is based on the 60 trading days ending March 31, 2015. Therefore the values used for the capital calculation in the market risk-weighted assets table (found at the beginning of the market risk section of this document) can be different than the values presented in the table below.

Table 11 - Market Risk - Total Regulatory Stressed VaR March 31, 2015
(Dollars in millions)

	Period End	10-day Holding Period		
		Average	High	Low
Total Regulatory Stressed VaR	\$ 830	\$ 735	\$ 1,039	\$ 483

Incremental Risk Charge

The IRC model is one component of the regulatory capital calculation for market risk. The model is intended to capture the potential losses that non-securitized covered position credit products in the trading portfolio might experience over a one-year period of financial stress from defaults, ratings migration and significant basis risk factors. To calculate potential losses at the required 99.9 percent confidence level, the Corporation utilizes a Monte-Carlo simulation calibrated using relevant, available historical data for each risk factor in order to sample potential market scenarios. The model reflects the impact of concentrated risks, including issuer, sector, region and product basis risks, and assigns a higher potential loss to a concentrated portfolio than a more diversified portfolio with a similar credit profile. The model framework also captures the broad relationships between the different risk factors and is flexible enough to allow additional dependencies or risk factors to be incorporated in the future. The IRC model assumes a constant position and a liquidity horizon of one year.

The following table presents the period end, average, high and low IRC over the period as of March 31, 2015. The IRC value used for the regulatory capital calculation is based on the higher of the period end value or the average value of the preceding 12 weeks.

Table 12 - Market Risk - Incremental Risk Charge March 31, 2015
(Dollars in millions)

	Period End	Average	High	Low
Total incremental risk charge	\$ 594	\$ 837	\$ 998	\$ 594

Comprehensive Risk Measure

The Corporation's comprehensive risk measure is another component of the regulatory capital calculation for market risk. The CRM is comprised of a modeled component and a surcharge for the eligible positions in the correlation trading portfolio, primarily tranches on index and bespoke portfolios, and their corresponding hedges.

The modeled component of the CRM takes into account all of the risk factors that materially impact the value of the positions within the correlation trading portfolio. The model captures the complexity of these positions including the non-linear nature of the trade valuations, particularly during periods of market stress, and the impact of the joint evolution of the risk factors. The modeled component of the CRM utilizes the same Monte-Carlo simulation framework as our IRC model with the additional risk factors required for the correlation products in order to calculate the potential losses at the required 99.9 percent confidence level. The modeled component of the CRM, like the IRC model, assumes a constant position and a liquidity horizon of one year.

The CRM surcharge is calculated using two components. The first is the assessment made using the SSFA. SSFA calculates capital on securitization exposures based on the amount and the level of subordination available as credit support to each exposure. The second component of the surcharge is the capital for hedges of the correlation portfolio which are calculated under the specific risk standard charge framework. The surcharge is equal to eight percent of the larger of the net longs or shorts of these aggregated components.

The following table presents the period end, average, high and low values for the CRM over the period as of March 31, 2015. The CRM value used for the regulatory capital calculation is based on the higher of the period end value or the average value of the preceding 12 weeks.

Table 13 - Market Risk - Comprehensive Risk Measure March 31, 2015
(Dollars in millions)

	Period End	Average	High	Low
Total comprehensive risk measure	\$ 1,076	\$ 1,037	\$ 1,141	\$ 974

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The following table presents the aggregate amount of correlation trading positions split between those that are included in the modeled component of the CRM and those that are subject to the securitization framework for the regulatory capital calculation as of March 31, 2015. Hedges to the correlation trading positions that are included in the modeled component of CRM are considered part of the aggregate correlation trading positions and are included in the table below. The values shown in the table are fair values.

	Correlation Positions	Hedges
Positions subject to comprehensive risk measure	\$ 637	\$ 375
Positions subject to securitization framework	2	-
Total correlation trading positions	\$ 639	\$ 375

The Corporation conducted an analysis to assess the validity of the IRC and CRM models and respective methodologies prior to being granted approval by the U.S. Agencies to utilize the models. This analysis consisted of a comparison of alternative theories and approaches along with an understanding of the necessary assumptions and limitations of the models, as well as assessing the impact of stressing the calibrated parameters. This analysis was shared and discussed with the relevant regulatory agencies to ensure compliance with regulatory guidelines. The models are continually monitored to ensure that the implementation and applicability remain valid. We perform stress tests of these models on a regular basis. The calibration of these models is regularly reviewed. We incorporate relevant market data and changing market conditions on a regular basis. As with our other quantitative risk models, Stressed VaR, IRC and CRM models fall under the oversight of the RM subcommittee and adhere to its independent analysis and ongoing governance and standards policies.

Securitization Activity within the Trading Book

Through the normal course of business we buy and sell securitization and re-securitization exposures across a number of asset classes such as residential real estate, commercial real estate, and consumer asset-backed securities. We are focused on making two way markets and intermediating transfers of risk between clients. We also continue to manage a legacy portfolio with the primary objective of managing the risk while reducing the exposures.

The risks we assume on securitization and re-securitization positions are driven by the structural features of the positions, performance of the underlying assets and other market risk factors. In order to gauge these risks and fulfill the securitization due diligence requirements set forth in Basel 3, these factors are assessed prior to the purchase of each securitization position. This assessment is documented within three days of purchase and a reassessment is made on a quarterly basis.

Risk management closely monitors the securitization inventory and analyzes changes in positions, the composition of portfolios, trading activity and market risk factors to assess the overall level of market risk of securitizations and re-securitizations to which the Corporation is exposed. For the purpose of managing the Corporation's risk appetite in relation to securitization and re-securitizations, limits are established and tracked daily in the centralized limits management system. These limits range from granular measures such as fair value and the sensitivities to changes in market risk factors to aggregated portfolio measures such as VaR and stress testing results.

The modeling framework for securitization and re-securitization risk is based on a look-through approach to the underlying collateral level data. Models are used to project prepayment speeds, default rates and loss severity, which are key inputs in the valuation for both government guaranteed and private label securities. These models incorporate market variables such as the level and volatility of interest rates and credit spreads, as well as macro-economic variables such as gross domestic product, unemployment and housing prices. Models are back-tested periodically to measure the accuracy of the model forecasts against actual underlying collateral performance.

The Corporation manages and mitigates the risks inherent in securitization and re-securitization positions, including the use of offsetting positions and portfolio diversification. The use of offsetting positions includes the use of both macro and position level hedges to either reduce exposure to certain risk factors or potential market stress events. In addition, the Corporation maintains a diversified portfolio across securitized product types to reduce its sensitivity to individual product types, issuers and servicers.

The standard specific risk portion of the regulatory capital calculation for securitized and re-securitized products is primarily based on the SSFA. The SSFA is used to assign a specific risk-weighting factor to each securitization or re-securitization position by taking into account factors such as the level of seniority of the position as well as the type and delinquency levels of its underlying exposures. Positions for which we are unable to collect recent data with respect to these inputs are assigned a 1250 percent risk-weight.

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The following table presents the aggregate amount of the trading book securitization positions by exposure type. The values shown reflect the Corporation's view of the most meaningful representation of each corresponding exposure type presented at fair value, except for derivatives referencing securitized products where bond-equivalent fair value is used. This table excludes the correlation trading positions that are defined as securitization positions, which are presented in the preceding table (correlation trading positions).

Residential Real Estate	\$ 1,821
Commercial Real Estate	412
Consumer ABS	704
Loans to Corporations	27
CDO	133
Correlation Trading Positions	639
Total Trading Book Securitization Positions	\$ 3,736

Trading Portfolio Stress Testing

Because the very nature of a VaR model suggests results can exceed our estimates and it is dependent on a limited historical window, we also stress test our portfolio using scenario analysis. This analysis estimates the change in value of our trading portfolio that may result from abnormal market movements.

A set of scenarios, categorized as either historical or hypothetical, are computed daily for the overall trading portfolio and individual businesses. These scenarios include shocks to underlying market risk factors that may be well beyond the shocks found in the historical period used to calculate VaR. Historical scenarios simulate the impact of the market moves that occurred during a period of extended historical market stress. Generally, a ten-business day window or longer representing the most severe point during a crisis is selected for each historical scenario. Hypothetical scenarios provide simulations of the estimated portfolio impact from potential future market stress events. Scenarios are reviewed and updated in response to changing positions and new economic or political information. In addition, new or ad hoc scenarios are developed to address specific potential market events or particular vulnerabilities in the portfolio. The stress tests are reviewed on a regular basis and the results are presented to senior management.

Stress testing for the trading portfolio is integrated with enterprise-wide stress testing and incorporated into the limits framework. The macroeconomic scenarios used for enterprise-wide stress testing purposes differ from the typical trading portfolio scenarios in that they have a longer time horizon and the results are forecasted over multiple periods for use in consolidated capital and liquidity planning. For more information on enterprise-wide stress testing, refer to *Managing Risk* within the MD&A section in the March 31, 2015 Form 10-Q.

EQUITY EXPOSURES – NOT SUBJECT TO MARKET RISK

Equity exposures not subject to market risk are excluded from trading assets on the balance sheet. Equity exposures not subject to market risk are comprised of a diversified portfolio of investments in private equity, real estate, Bank-Owned Life Insurance (BOLI) and other alternative investments and are generally recorded in other assets. These positions are held either in direct investments or through a fund, with related income recorded in equity investment income.

Accounting and Valuation

Certain equity investments in the portfolio are subject to investment-company accounting under GAAP, and accordingly, are carried at fair value with changes in fair value reported in equity investment income. At inception, the transaction price of an investment is generally considered to be the best indicator of fair value. Thereafter, valuation is based on an assessment of each individual investment using methodologies that include publicly traded comparable companies derived by multiplying a key performance metric (e.g., earnings before interest, taxes, depreciation and amortization) of the portfolio company by the relevant valuation multiple observed for comparable companies, acquisition companies, entry-level multiples and discounted cash flows, and are subject to appropriate discounts for lack of liquidity or marketability. Certain factors that may influence changes in fair value include, but are not limited to, recapitalizations, subsequent rounds of financing and offerings in the equity or debt capital markets. For fund investments, we generally record the fair value of our proportionate interest in the fund's capital as reported by the fund's respective manager(s). Other equity investments are accounted for under either the equity method or at cost, depending on the Corporation's ownership interest. For more additional information related to fair value accounting and valuation techniques, refer to *Note 14 – Fair Value Measurements* in the March 31, 2015 Form 10-Q and *Note 1 - Summary of Significant Accounting Principles* in the December 31, 2014 Form 10-K.

Under Basel 3, approaches to measuring equity exposures for equity investments that are not subject to market risk vary based on the intent of holding the exposure. If the equity exposure is held for investment purposes, it is subject to the simple modified risk weight approach or the full look-through approach. These assets are treated as though they are held by the Corporation and weighted according

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to the proportional ownership of the exposure. All other equity investments are held at carrying value through the simple risk weight approach and apply the multiplier according to the prescribed regulatory percentages.

Equity Exposures

The following table presents the fair values and carrying values of the Corporation's equity investments at March 31, 2015.

<i>(Dollars in millions)</i>	Balance Sheet		Fair Value	
Publicly traded ¹	\$	10,023	\$	10,023
Non-publicly traded		4,709		4,709
Bank-owned life insurance		19,214		19,214
Money market mutual fund		734		734
Community development corporation		6,492		6,492
Federal Reserve Bank stock		5,236		5,236
Federal Home Loan Bank stock		1,452		1,452
Hedge funds		2		2
Others		138		138
Total	\$	48,000	\$	48,000

¹No shares that are publicly traded contain a material difference between the carrying value and the fair value of shares.

The following table presents the capital requirements (charge) for equity investments allocated by the applicable risk-weight category at March 31, 2015.

<i>(Dollars in millions)</i>	EAD		RWA	
0%	\$	5,316	\$	-
20%		1,452		290
100%		21,924		21,924
600%		15		90
Full look-through approach		20,222		5,492
Total	\$	48,928	\$	27,797

Total cumulative net realized losses arising from the sale and liquidation of equity investments were \$2 million for the quarter ended March 31, 2015.

Total net unrealized gains on available-for-sale (AFS) equity investments recognized in accumulated other comprehensive income were \$36 million of which \$22 million and \$16 million were included in Tier 1 capital and Tier 2 capital, respectively for the quarter ended March 31, 2015.

INTEREST RATE RISK FOR NON-TRADING ACTIVITIES

Interest rate risk represents the most significant market risk exposure to our non-trading balance sheet. Interest rate risk is measured as the potential change in net interest income caused by movements in market interest rates. Client-facing activities, primarily lending and deposit-taking, create interest rate sensitive positions on our balance sheet. Interest rate risk from these activities, as well as the impact of changing market conditions, is managed through our ALM program.

Risk Measurement

The interest rate scenarios that we analyze incorporate balance sheet assumptions such as loan and deposit growth and pricing, changes in funding mix, product re-pricing and maturity characteristics. Our overall goal is to manage interest rate risk so that movements in interest rates do not significantly adversely affect earnings and capital.

We prepare forward-looking forecasts of net interest income. The baseline forecast takes into consideration expected future business growth, ALM positioning and the direction of interest rate movements as implied by the market-based forward curve. We then measure and evaluate the impact that alternate interest rate scenarios have on the baseline forecast in order to assess interest rate sensitivity under varied conditions. The net interest income forecast is frequently updated for changing assumptions and differing outlooks based on economic trends, market conditions and business strategies. Thus, we continually monitor our balance sheet position in an effort to maintain a level of exposure to interest rate changes commensurate with our risk appetite.

Risk Management

The securities portfolio is an integral part of our ALM positioning and is primarily composed of debt securities, including MBS and U.S. Treasury securities. As part of our ALM positioning, we use derivatives to hedge interest rate and duration risk. Our interest rate contracts are generally non-leveraged, interest rate and foreign exchange basis swaps, options, futures and forwards. In addition, we use foreign exchange contracts, including cross-currency interest rate swaps, foreign currency forward contracts and options to mitigate foreign exchange risk associated with foreign currency-denominated assets and liabilities.

For additional information on interest rate risk for non-trading activities, including the impact to earnings from upward and downward rate shocks, refer to *Interest Rate Risk Management for Nontrading Activities* within the MD&A section in the March 31, 2015 Form 10-Q.

SUPPLEMENTARY LEVERAGE RATIO

Basel 3 also requires the calculation of a supplementary leverage ratio (SLR). The numerator of the SLR is quarter-end Basel 3 Tier 1 capital under transition provisions. The denominator is supplementary leverage exposure based on the daily average of the sum of on-balance sheet exposures less permitted Tier 1 deductions (under transition provisions), as well as the simple average of certain off-balance sheet exposures, as of the end of each month in a quarter. Off-balance sheet exposures include lending commitments, letters of credit, OTC derivatives, repo-style transactions and margin loan commitments. Total leverage exposure includes the effective notional principal amount of credit derivatives and similar instruments through which credit protection is sold. The credit conversion factors (CCFs) applied to certain off-balance sheet exposures, conform to the graduated CCF utilized under the Basel 3 Standardized approach, but are subject to a minimum 10 percent CCF. Effective January 1, 2018, the Corporation will be required to maintain a SLR of at least 5.0 percent (3.0 percent minimum, plus a supplementary leverage buffer of more than 2.0 percent) to avoid certain restrictions on capital distributions and discretionary bonus payments. Insured depository institution subsidiaries, including BANA, will be required to maintain a SLR of at least 6.0 percent to be considered "well capitalized" under the agencies' PCA framework.

Table 18 - Summary Comparison of Accounting Assets and Total Leverage Exposure	March 31, 2015
<i>(Dollars in millions)</i>	
Total consolidated average assets ¹	\$ 2,143,120
Adjustment for investments in banking, financial, insurance or commercial entities that are consolidated for accounting purposes but outside the scope of regulatory consolidation	-
Adjustment for fiduciary assets recognized on balance sheet but excluded from total leverage and exposure	-
Adjustment for derivative exposures	379,483
Adjustment for repo-style transactions	20,235
Adjustment for off-balance sheet exposures (that is, conversion to credit equivalent amounts of off-balance sheet exposures)	246,450
Other adjustments	(81,304)
Total leverage exposure	\$ 2,707,984

¹ Represents the daily average of on-balance sheet assets for the quarter.

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Table 19 - U.S. Supplementary Leverage Ratio	March 31, 2015
<i>(Dollars in millions)</i>	
On-balance sheet exposures	
On-balance sheet assets (excluding on-balance sheet assets for repo-style transactions and derivative exposures, but including cash collateral received in derivative transactions)	\$ 1,870,088
LESS: Amounts deducted from tier 1 capital	81,304
Total on-balance sheet exposures	1,788,784
Derivative exposures	
On-balance sheet derivative exposures (net of cash variation margin)	59,102
Add-on amounts for potential future exposure (PFE) for derivative exposures	230,064
Effective notional principal amount of sold credit protection	1,113,627
LESS: Effective notional principal amount offsets and PFE adjustments for sold credit protection	964,208
Total derivative exposures	438,585
Repo-style transactions	
On-balance sheet assets for repo-style transactions (excluding gross value of receivables for reverse repurchase transactions)	213,930
Counterparty credit risk for all repo-style transactions	20,235
Exposure for repo-style transactions where a banking organization acts as an agent	-
Total exposures for repo-style transactions	234,165
Other off-balance sheet exposures	
Off-balance sheet exposures at gross notional amounts	823,746
LESS: Adjustments for conversion to credit equivalent amounts	577,296
Other off-balance sheet exposures	246,450
Capital and Total Leverage Exposure	
Tier 1 Capital	173,155
Total Leverage Exposure	\$ 2,707,984
Supplementary Leverage Ratio	6.39%

APPENDIX

Bank of America’s Form 10-K and Form 10-Q contain pertinent information related to the Basel 3 disclosure requirements. A summary of the references made in the preceding disclosure can be found in the table below.

References to Form 10-Q

Section	Location
<i>Business Overview</i>	<i>Executive Summary</i>
<i>Capital Management</i>	<i>MD&A</i>
<i>Credit Risk Management</i>	<i>MD&A</i>
<i>Interest Rate Risk Management for Nontrading Activities</i>	<i>MD&A</i>
<i>Liquidity Risk</i>	<i>MD&A</i>
<i>Managing Risk</i>	<i>MD&A</i>
<i>Quarterly Average Balances and Interest Rates – FTE Basis</i>	<i>Table 11</i>
<i>Bank of America Corporation Regulatory Capital</i>	<i>Table 15</i>
<i>Capital Composition</i>	<i>Table 17</i>
<i>Bank of America, N.A. Regulatory Capital</i>	<i>Table 19</i>
<i>Additional Collateral Required to be Posted upon Downgrade</i>	<i>Table 26</i>
<i>Consumer Credit Quality</i>	<i>Table 29</i>
<i>Residential Mortgage State Concentrations</i>	<i>Table 33</i>
<i>Home Equity State Concentrations</i>	<i>Table 35</i>
<i>U.S. Credit Card State Concentrations</i>	<i>Table 40</i>
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<i>Derivatives</i>	<i>Note 2</i>
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<i>Outstanding Loans and Leases</i>	<i>Note 4</i>
<i>Impaired Loans – Consumer Real Estate</i>	<i>Within Note 4</i>
<i>Impaired Loans – Credit Card and Other Consumer – Renegotiated TDRs</i>	<i>Within Note 4</i>
<i>Impaired Loans – Commercial</i>	<i>Within Note 4</i>
<i>Allowance for Credit Losses</i>	<i>Note 5</i>
<i>Securitizations and Other Variable Interest Entities</i>	<i>Note 6</i>
<i>Goodwill and Intangible Assets</i>	<i>Note 8</i>
<i>Commitments and Contingencies</i>	<i>Note 10</i>
<i>Shareholders’ Equity</i>	<i>Note 11</i>
<i>Accumulated Other Comprehensive Income (Loss)</i>	<i>Note 12</i>
<i>Fair Value Measurements</i>	<i>Note 14</i>
<i>Fair Value of Financial Instruments</i>	<i>Note 16</i>

References to Form 10-K

Section	Location
<i>Business</i>	<i>Part I, Item 1</i>
<i>Credit Risk Management</i>	<i>MD&A</i>
<i>Market Risk Management</i>	<i>MD&A</i>
<i>Statistical Tables</i>	<i>MD&A</i>
<i>Selected Loan Maturity Data</i>	<i>Table IX</i>
<i>Summary of Significant Accounting Principles</i>	<i>Note 1</i>
<i>Securitizations and Other Variable Interest Entities</i>	<i>Note 6</i>
<i>Long-term Debt</i>	<i>Note 11</i>
<i>Regulatory Requirements and Restrictions</i>	<i>Note 16</i>