

Paper Procurement Policy

Background

Bank of America has had an early and long-standing commitment to the procurement of environmentally and socially sustainable paper products. That commitment became an essential element of our operations and the way we do business since before it was fully articulated in our 2005 paper procurement policy.

Our current policy reflects an even greater understanding of the role of paper in the environment. It is rooted in years of direct supply chain experience; a larger body of knowledge from the growing application of analytical tools like life-cycle assessment to paper production and use; and a deeper appreciation for the complexity of what makes paper sustainable.

We have developed this policy transparently and in extensive discussions with non-governmental organizations, customers, paper suppliers and trade associations, all of whom invested generous time in suggesting improvements.

Overview

Our goal is to build on our success in meeting previous sustainable paper commitments and expand those commitments by reducing the environmental burdens of the paper we procure even further through:

- Source Reduction, Recycled Content and Recycling – Bank of America will build on its long-standing commitment to minimize paper consumption, incorporate more recycled content and recycle more of the paper we use;
- Sustainable Forest Practices and Certification – the bank will require its paper suppliers to document the sustainability of fiber sources through certification; and
- Greenhouse Gas Reduction and Mill Environmental Performance – the bank will prefer suppliers whose products, manufacturing practices, and policies reduce the emissions of greenhouse gases and demonstrate overall continual improvement in mill environmental performance.

This policy covers paper for internal use, such as copy paper and notebooks, as well as paper for external use, including customer correspondence and marketing materials.

Policy

Source Reduction, Recycled Content and Recycling

- A. The bank will continue to set aggressive public operational goals related to paper including targets for reduced consumption, average recycled content, and percent of paper sourced from certified forests.
- B. As a component of its secure document disposal program, the bank will recycle paper it uses in internal operations and receives from external sources.
- C. Bank of America will encourage any supplier with which it enters into a contractual agreement for the provision of goods or services to use, consistent with the efficient performance of such agreements, recycled paper products and to implement and adhere to other applicable environmentally beneficial policies and practices.

Sustainable Forest Practices and Certification

- A. The bank purchases only those paper products that its suppliers can document come from fiber sources that meet our high standards of sustainability. Our suppliers must demonstrate their commitment to sustainability by meeting all of the criteria of one or more of the forest certification standards recognized under the bank's [position on forest certification](#), particularly those standards that protect and promote high conservation value forests. In addition, suppliers must continue to document that they have eliminated fiber from unsustainable sources, including from illegally harvested wood, from land that is systematically being converted from natural forest ecosystems to tree farms or plantations, as well as fiber from trees that have been non-traditionally genetically engineered.
- B. Suppliers of paper products will be required to document independent third party certification of sustainable forestry practices for all forests they own or manage. At this time, 99 percent of Bank of America's printing and writing papers are certified to one of the standards recognized under the bank's forest certification position. The bank has expanded its paper procurement policy to prefer products and suppliers whose fiber is chain-of-custody certified to sustainably managed sources under one of the recognized standards.
- C. Bank of America will meet annually with paper mills that together represent 90 percent of the bank's paper sources and require that they document and show progress in supporting our forest policy. All paper sources are and will continue to be annually required to demonstrate and document compliance with the Lacey Act. False declarations of compliance or failure to adhere to conditions will be considered breaches of purchasing terms and conditions and appropriate actions will be taken. Bank of America will require supplier company representations and warranties to demonstrate compliance with the above conditions.

Greenhouse Gas Reduction and Mill Environmental Performance

- A. Bank of America policy has been to promote the reduction of greenhouse gases and other emissions from the manufacture of its paper products by specifying a purchasing preference for those papers manufactured at mills using processes that demonstrate superior environmental performance.
- B. Using our own supplier reviews, questionnaires and tools like the Environmental Paper Assessment Tool (EPAT), we will continue to monitor the environmental performance of our suppliers' mills and encourage them to practice continuous environmental improvement, including the reduction of water use and air, water and solid waste emissions; the use of superior pulp and paper technologies and processes; the use of more biomass and less fossil fuels; and certification to ISO 14001 or other environmental management systems.
- C. Bank of America has long had a program to reduce greenhouse gas emissions through paper reduction and has, and will continue to publicly report the results as part of its overall, corporate-wide greenhouse gas reductions.

Working with Bank of America Stakeholders

True paper sustainability requires collaboration among key players in the supply chain, as well as the participation of other interested internal and external stakeholders.

In addition to engaging with its paper products suppliers to insure compliance with the above policies, Bank of America will encourage its suppliers to continually strive to meet environmental performance expectations. The bank will extend purchasing preference to products and suppliers that exhibit superior environmental performance, where cost, quality, and feature requirements allow.

We also recognize that successful implementation of these policies requires transparency to all stakeholders, appropriate training of all relevant associates, and regular public reporting. The bank has integrated sustainable forestry and paper manufacturing process elements within existing employee environmental programs and communications and will report on environmental data in accordance with the Global Reporting Initiative (GRI) framework.